

MIR Consultation Question Summaries

Issue: Aims & Objectives	MIR question: Question 1
Total number of responses on issue	201
Support aims and objectives	129
Do not support aims and objectives	64
<p>Scottish Government, key agencies, and adjoining authorities</p> <p><u>Scottish Government</u> believes the LDP should make explicit reference to enhancement of Green networks and reference to green networks could be added in to the Objective. “To ensure that the area’s significant international, national and local cultural and natural heritage assets including green networks are protected and conserved, and where appropriate enhanced, including biodiversity, flora and fauna as well as soil, water and air quality.” Welcome that one of the proposed Objectives/ Outcomes is to recognise the important role that town centres and other mixed use areas have in providing services locally.</p> <p><u>Scottish Water</u>: supports the aims and objectives of the LDP and is committed to ensuring that adequate infrastructure is available to enable development in line with its responsibilities.</p>	
<p>Internal Consultees:</p> <p><u>ELC Countryside</u>: Radical industrial developments are proposed which will affect quality of life dramatically. The two ideas for accommodating new house building will not serve the needs of the whole county well. Small housing developments throughout the county particularly providing affordable housing in areas such as Gullane and North Berwick need to go hand in hand with dramatic improvement on the whole counties' accessibility and in particular bus services. Ensure that the area’s significant international, national and local cultural and natural heritage assets are protected and conserved, and where appropriate enhanced, including biodiversity, flora and fauna as well as soil, water and air quality - importance of green networks as dictated by NPF3.</p>	
<p>National interest groups</p> <p><u>Royal Society of Protection of Birds (RSPB)</u> commend the aims of sustainable development, including sustainable travel and the aim to minimise greenhouse-gas emissions. Commend the aim and objective to protect and enhance the area’s high quality environment. The report’s recognition of East Lothian’s coastline importance for its wildlife, notably birds is welcomed. The aspiration to improve rail transport, particularly new stations at East Linton and Blindwells is also welcomed.</p> <p><u>Homes for Scotland</u>: supports the clear plan objective of increasing housing supply, and the recognition given to needing to ensure sites are allocated in marketable locations. This is vital if the plan is to be successfully implemented, shows a proper understanding of the needs of the house-building industry and provides a strong context for emerging policies on housing supply.</p> <p><u>Network Rail</u>: The rail network within the MIR boundary has clearly been a key consideration in preparing the document’s vision and spatial strategy. This reflects the aspirations of Scottish Planning Policy which places a strong emphasis on sustainable locations for new development, with good access to public transport a key constituent. Network Rail are supportive of this approach provided that due consideration is given to the impacts that new development may have on the existing rail network. Network Rail supports strategies which to promote integrated and sustainable</p>	

development. It is similarly keen to promote safeguarding and improving the existing and railway network in tandem with new development, and that appropriate contributions are required to effect improvements.

National Trust For Scotland: We strongly agree that the development of previously developed land must be the priority. We welcome the minimisation of flood risk and focus on climate change resilience, this must be reflected in only proposing housing sites which are not on floodplains.

Scottish Wildlife Trust: We consider that the Aims are about promoting development but do not reflect the need to protect the natural environment. The aim does mention 'in a sustainable way' but this needs to be further defined. Similarly the Objective to 'promote sustainable development' outlines measures to promote climate change and limit travel which are all part of sustainable development but there is no clear recognition of the need to protect our natural resources.

Landowners, developers and agents

APT Planning & Development on behalf of Cruden homes and Cala Management Ltd supports the general aims and objectives of the MIR.

APT planning and development on behalf of W.J. Simpson and Son are pleased to support the MIR document in identifying the field at Castlemains Place as a preferred site for future residential development.

Inch Cape Offshore Limited (ICOL) generally welcomes the vision, aims, objectives and outcomes of the MIR, set out in Section 4. In the Section under 'Promote Sustainable Development' (para.4.3), it is noted that the MIR identifies the need to 'provide for appropriate renewable energy generation opportunities'.

Walker Group (Scotland) Ltd supports the clear plan objective of increasing housing supply, and the recognition given to needing to ensure sites are allocated in marketable locations.

Bourne Leisure welcomes the objective of 'encouraging the diversification of the rural economy by supporting appropriate economic development and tourism'.

Viridor fully supports the Aims, Objectives of the MIR.

Whithall Lodges support the Vision Aims Objectives and Outcomes in the LDP.

Gladman Developments Ltd supports the aims and objectives for the LDP and believes they are clear and set out that East Lothian will provide for the city region and meet housing requirements in appropriate marketable locations. It is key marketable locations are chosen to ensure the housing supply is effective. Additional factors to be considered which would ensure an effective housing supply include: a generosity factor; range of sites by size and location; and small effective in the short term sites.

PPCA Ltd on behalf of Wallace Land Investments supports the statement that the Main Issues Report will "meet housing requirements in appropriate marketable locations". However, the strategy adopted will not deliver this as it does not properly and fully consider all marketable locations. By focusing development in an artificially small western sector of the Council area, and in the face of fundamental and strategic infrastructure constraints as confirmed within the document itself, the Council has not produced a deliverable Main Issues Report that is compliant with the Strategic

Development Plan.

George F White LLP on behalf of Mr M Steven & Mr D Lockie is in general agreement with the aims and objectives of the MIR. 1.2 In particular an agreement that greenfield land will have to be used in an efficient way to meet the scale of strategic development requirements. Clarification about what an 'effective use of greenfield land' is required, regarding the standards which will be applied to meet this criterion.

GL Hearn on behalf of the Co-operative Group support the stated aim that the strategy and policies of the East Lothian LDP will contribute to the Edinburgh City Region being a 'healthier, more prosperous and sustainable place'.

Scott Hobbs on behalf of In-site Property Solutions supports the overall preferred strategy of the MIR, with some reservation for which more information is provided in the detailed response to each relevant question. In-Site supports the overall Aims, Objectives and Outcomes proposed in the MIR including the intention to promote sustainable development and to help grow the economy and increase housing supply.

Scott Hobs on behalf of Ashfield Land believes SPP seeks to "support economically, environmentally and socially sustainable places". The protection and enhancement of natural heritage, including green infrastructure, landscape and the wider environment is a further key policy principle. In relation to development plans, the SPP states at paragraph 30 that the spatial strategy of an LDP should be "both sustainable and deliverable, providing confidence to stakeholders that the outcomes can be achieved". The objectives and outcomes of the MIR should be amended to ensure that they closely reflect the presumption in favour of sustainable development as outlined in SPP and the focus for new development being on sustainable, deliverable locations.

Scott Hobbs on behalf of SP Energy Networks believes there are significant plans for offshore wind to the east of the Firths of Forth and Tay. We want developers to work together to minimise the number and impacts of these developments by combining infrastructure where possible. Whilst we have safeguarded Cockenzie as a site for future thermal generation, it may present significant opportunities for renewable energy-related investment. We expect developers, East Lothian Council and the key agencies, including Scottish Enterprise to work together to ensure that best use is made of the existing land and infrastructure in this area.

Scott Hobbs on behalf of Queen Margaret University believes the constraints of the local road network, most notably centred on the Old Craighall junction on the A1, are recognised in the MIR. QMU considers this to be a critical issue constraining the future economic development prospects of East Lothian and in particular the delivery of the long-established employment land allocation adjacent to the University at Craighall.

Geddes Consulting on behalf of Hamilton & Kinneil Estates, Lothian Park Ltd, Wallace Land Gladys Dales Drylaw Trust and The Sir John Hope Executry and Sirius Sport & Leisure believes it is really important that the Council sets aims and objectives that are transparent and help pull together all investors in the future including the private sector, infrastructure providers, the Council and Government agencies. However, the aims and objectives set out in the Main Issues Report do not set out the key measurable targets that the LDP needs to achieve to help co-ordinate future investment.

Persimmon Homes welcomes that it is noted that any allocated sites need to be in marketable locations. The requirements of developers has to be understood if the Proposed Plan is to deliver

sufficient housing.

Clarendon Planning & Development Ltd on behalf of Sir John Hope Executry, Barratt David Wilson Home and The Traquair Family state that the plan's key aims are broadly supported, however, in terms of delivering spatial strategy, as noted within the MIR, aims are under severe threat with a delayed development plan preparation process. As such, if East Lothian's aims are to be achieved, the Council must support early approval of proposed development allocations and ensure that effective land supply requirements are met via early approval of suitable housing sites. The plan's objectives and outcomes are broadly supported and land at The Loan, Musselburgh, as a readily deliverable housing site, can clearly contribute to meeting the LDP objectives and outcomes by virtue of its proximity to existing public transport provision including rail connection.

Colliers on behalf of Taylor Wimpey and Mactaggart and Mickel supports the aims, objectives and outcomes of the MIR.

Chalmers & Co believes that the MIR purports to provide the big ideas. Clearly there are big ideas, but they appear to focus significantly on a housing 'problem' - how to accommodate an incoming population rather than how to serve the existing population better. It does not therefore read as East Lothian's own plan with big ideas for the well-being of the population and the county at large - and sectors in particular - urban, rural, business & residential whilst at the same time taking note of national issues lined with energy and the environment.

Rick Finc Associates on behalf of landowners of new site 4Fd, Hallam Land and MJ and V Rennie Trust clients are fully supportive of the Vision, Aims, Objectives and Outcomes for the LDP and promotes sites that are effective and deliverable at Haddington, Dolphingstone and West Barns.

GVA James Barr on behalf of Ediston Real Estate and J & W Jenkinson support of the aim to recognise the important role that town centres and other mixed use areas have in providing services locally and to protect them from inappropriate development. However a strategy that acknowledges that development outwith the town centre is required in Haddington should also be adopted.

Turley on behalf of Hargreaves UK Services Ltd and Mr R Kennedy concur that having an appropriate framework can not only facilitate appropriate development in sustainable locations but can also manage development from taking place in inappropriate locations.

Ryden on behalf of the Wemyss & March Estate are pleased to see the LDP recognise the role East Lothian has in accommodating and providing for the city region's population and household growth. Planning should support proactively development that will contribute to sustainable economic growth and to high quality sustainable places.

Savills on behalf of Drygrange Estate Company Ltd support the objective to 'Help grow the economy, increase housing supply and reduce inequalities' and the identified outcomes: 'To provide opportunities for economic growth and job creation and to meet housing requirements in appropriate marketable locations.

Community Councils and local interest groups

Dunpender Community Council believes public transport is more expensive in the east of the county. An integrated transport network should be prioritised to enable our young people to access education and employment opportunities at QMU and in Edinburgh, and that older people have easier access to Edinburgh Royal Infirmary and the Western General for medical treatment.

Humbie, East and West Saltoun and Bolton Community Council believes it is helpful to recognise the development pressures and the fact that East Lothian is part of the wider City of Edinburgh region. The LDP must seek to accommodate this pressure in the most sustainable and realistic way.

North Berwick Community Council have some concerns about possible conflicting priorities including the danger of North Berwick becoming a dormitory town, the lack of infrastructure, and poor transport links in the county.

Architectural Heritage Society of Scotland believes that the new Local Development Plan should describe a vision for a rural county with a varied landscape. It requires a sensitive and informed policy regime to secure their continued conservation as the epitome of those special qualities of this county prized by its inhabitants and visitors alike, and are essential to the economic future of the county.

East Lammermuir Community Council support sustainable development but are not sure that the implementation of policies - and thus the contents of the present MIR - always reflect these aspirations.

Common Weal Dunbar supports the general aims and objectives of the Main Issues Report. We believe however that there should be more explicit reference to, and policies for, the reduction of carbon emissions in the region in order to comply with Scottish carbon reduction obligations.

Prestonpans Community Council believes house builders seem to be defining where new housing is going, there is a need to address education infrastructure issues, and the specific needs of deprived population. Transport infrastructure in the west is operating at or beyond capacity.

Sustaining Dunbar and Scottish Green Party East Lothian support the overall aims and objectives of the MIR. However, it feels that there could usefully be more explicit recognition of the need to reduce carbon emissions by around 5% per year in order to comply with Scottish carbon reduction obligations and of the transformational changes implied by this –as recognised in RPP2.

Haddington and District Amenity Society (HADAS) believes the last local plan failed to deliver sufficient housing with inappropriate housing sites being granted consent through the back door. Simple planning policies and approaches to development should not just draw on the planning approach being promoted and considered for Edinburgh. Must be a clear strategy for and vision of the future of the urban and rural area that protects the qualities of the County.

Members of the public

- Support aim to integrate East Lothian with city of Edinburgh and link development with infrastructure to facilitate access to leisure educational and employment facilities;
- Also opposition to East Lothian being seen as a part of the Edinburgh City Region;
- Expansion in population of Edinburgh will have an overbearing affect;
- Conflict between protection and enhancement of the environment and proposed level of house building within East Lothian;
- Need to recognise the role of Town Centres and have policies to support their viability;
- Concern about building on prime agricultural land and loss of green belt;
- Open spaces surrounding Edinburgh should not be lost;
- Priorities seem to be distorted towards car drivers and volume house builders;
- Need to preserve character of villages like Gullane;

- Concern about impacts on the local infrastructure, roads and public transport and their ability to cope with level of predicted growth;
- Dispersed approach will increase need to travel and CO² emissions;
- The predicted growth is unsustainable;
- Expansion of Longniddry will bring benefits to local community – affordable homes;
- Need an articulated vision for East Lothian as somewhere distinctive both as a place to live and work and also a place to visit;
- East Lothian is already one of the most prosperous parts of Scotland and the council's objective should not be to make it more prosperous. Rather, the goal should be to ensure that the prosperity is more evenly shared across the whole population, tackling the pockets of poverty within the local authority area;
- There is insufficient affordable housing and special needs housing including housing for the elderly being built in the towns and villages;
- Measuring effectiveness of aims and objectives is complex and difficult to do;
- The plan's aim should also be to reduce inequalities;
- Development of brownfield land must be a priority;
- Development should respect character of surrounding area;
- More emphasis should be placed on enhancing the natural environment.

KEY MESSAGES

- **Overall support for the vision, aims and objectives from all groups;**
- **Concern that there are conflicting priorities between protection of the environment and the impacts of predicted growth on it;**
- **Concern that East Lothian is seen as an extension of Edinburgh;**
- **Concern about scale of growth and its impact on infrastructure;**
- **Scale of growth will result in loss of significant areas of prime agricultural land;**
- **Scale of growth will impact on character of settlements;**
- **Need to ensure support for town centres;**
- **Developers stress that new housing needs to be in marketable locations if the plan is to deliver sufficient housing;**
- **Tangible targets should be set against which to measure effectiveness of aims and objectives (jobs / homes etc).**

Issue: Sustainability & Climate Change	MIR question: Question 2
Total number of responses on issue	132
<p>Scottish Government and key agencies</p> <p><u>Scottish Government:</u> The preferred approach of embedding the principles of sustainable development in the LDP’s spatial strategy, policies and proposals is supported. The LDP should give due weight to net economic and social benefit and supporting delivery of accessible housing, business, retailing and leisure development.</p> <p><u>Scottish Environmental Protection Agency:</u> The Main Issues Report, Interim Environmental Report and Monitoring Statement all address the balance to be struck by maintaining air quality or ensuring no further deterioration in air quality from road traffic and preventing a significant increase in CO2 emissions. SEPA recognises this is a difficult balance to strike and will be happy to give assistance in the preparation of LDP.</p> <p><u>Scottish Water:</u> Scottish Water is supportive of this sustainable approach and encourages development to be sited in areas where there is sufficient capacity.</p> <p><u>Midlothian Council:</u> would encourage consideration of how the Plan can support waste heat being put to use in mitigating greenhouse gases, including sources of heat in Midlothian arising from Zero Waste Management facilities in particular. MC would also encourage consideration of how the Plan can facilitate the development of heat networks which straddle the East Lothian/Midlothian boundary.</p>	
<p>National Interest Organisations</p> <p><u>Royal Society for Protection of Birds (RSPB) :</u> We commend the proposals/aspirations in this section.</p> <p><u>Homes for Scotland</u> strongly supports the proposal to embed the Scottish Planning Policy presumption in favour of sustainable development within the LDF. In accordance with paragraph 30 of Scottish Planning Policy, it does appear that the Council are seeking to positively seek opportunities to meet the development needs of the plan area in a way which is flexible enough to adapt to changing circumstances over time. Given the acknowledged need to increase the rate of house-building in East Lothian, the presumption section of the forthcoming plan could usefully explain how the presumptions relates to housing proposals, and what contribution housing development will make to a sustainable East Lothian.</p> <p><u>Network Rail</u> states that there are a wide range of fronts upon which climate change needs to be tackled as we adapt to more severe weather events - including the need to protect existing infrastructure. In addition to addressing climate change through sustainable development this section notes that new development should be prevented from locating in areas susceptible to climate change. However, there is a need to recognise that some major infrastructure (i.e. communications, utilities, roads and railways) are currently located in these vulnerable areas and also represent considerable historic public investment. Policies which anticipate and support the need to protect the public’s significant investment in existing infrastructure should be provided and support enhancements where these are required. Policy support for these exceptions arises if a development in a vulnerable location is essential for operational reasons, or is part of an existing network. The criteria for ‘exceptions’ should be the functional and operational requirements of providers of</p>	

existing linear land-based infrastructure.

Internal consultees

ELC Countryside: Defining sustainability early within this section would help the reader and avoid later potential misinterpretation. The East Lothian coast, one of the county's most important assets, is directly threatened by sea level rise and climate change and indirectly affected by issues such as nitrogen deposition. Since it is not possible to create the coast elsewhere, it must be protected and enhanced in its current location. The issue of protection and enhancement of the coastal landscape needs to be introduced as a topic here, so as to justify and support actions that will be required to allow adaptation and minimise impacts.

Landowners, developers and agents

Scottish Power Generation LTD: The consent to repower Cockenzie power station from coal to gas will result in lower emissions of CO₂, negligible emissions of SO₂ and a substantial reduction on NO₂, thereby assisting in reducing greenhouse gas emissions. Reflecting the existing consent for the CCGT under S36 of the Electricity Act 1989 within the LDP is therefore supported.

Whitehall Lodges believes the allocation of its land for tourist development will support sustainable development objectives without any significant environmental impact. We support the preferred approach and intention to promote sustainability and climate change mitigation and adaptation. Our proposal at Wallyford does not prejudice this and will be designed to maximise amenity.

Scott Hobbs Planning on behalf of Ashfield Land note that the preferred approach, in relation to 'sustainability and climate change mitigation and adaptation' is to embed the principles of sustainable development in the LDP's spatial strategy, policies and proposals. According to the MIR, this includes directing development to appropriate locations, integrating land use and transport. The development strategy should also be deliverable. The western part of the Council area is the most sustainable from an economic, social and environmental perspective and Ashfield has promoted Goshen Farm since 2011 as one of the most sustainable locations for larger scale housing-led growth in East Lothian. On the specifics of Question 2 there is no reference to SPP and the presumption in favour of sustainable development in particular, under the policy context Chapter 3. This is an omission and should be rectified. The presumption in favour of development that contributes to sustainable development is addressed at paragraph 28 and the bullet points at paragraph 29. Paragraph 28 states that "the planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term. The aim is to achieve the right development in the right place; it is not to allow development at any cost". Paragraph 5.2 of the MIR does not accurately reflect this Principal Policy of Scottish Government. There is, for example, no reference whatsoever to economic and social sustainability in this paragraph. The LDP would, in the absence of such a reference, be inconsistent with the Sustainability policy principle in SPP.

Rick Fink Associates on behalf of landowners made comments in support of sustainable development for clients at suggested sites at Letham Mains Holdings, Haddington; Sheriff Fields, West Barns; and Dolphingstone Farm, Dolphingstone. The location and physical characteristics of these sites make them appropriate for allocation in the LDP.

Gladman Developments Ltd supports the proposal to embed the Scottish Planning Policy presumption in favour of sustainable development within the LDP. It could be useful to clarify, in which circumstances, the presumption carries greater weight in the determination of applications

i.e. when the plan is out of date or 5 year land supply is not maintained.

Geddes Consulting on behalf of Wallace Land and the Sir John Hope Executry/ Lothian Park Ltd / Hamilton & Kinniel Estates Wallace Land and Gladys Dale/Drylawhill Trust/Hallam Land/ Sirius Sport and Leisure believes that the planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term. The aim is to achieve the right development in the right place; it is not to allow development at any cost. SPP introduces a presumption in favour of development that contributes to sustainable development. Paragraph 28 states that: The planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term. The Main Issues Report does not explain how the Council intends to fully address these matters. As the Council is aware, its development strategy, as well as meeting its housing land requirement, needs to ensure that a 5 year effective housing land supply is being maintained at all times. The analysis carried out by Geddes suggests that it is highly unlikely that the emerging development strategy in the emerging LDP will deliver a 5 year effective housing land supply in the medium term.

Persimmon Homes states that the inclusion of the presumption in favour of sustainable development from Scottish Planning Policy within the LDP is supported. However further information relating to how East Lothian interprets this policy would be advantageous to include within the LDP to best allow implementation of policy and to allow for better understanding by developers as to what this statement will require from them.

Clarendon Land on behalf of Barratt David Wilson Homes & Traquair family states that the preferred approach of embedding the principles of sustainable development within the LDP is supported on the basis that development delivery is maximised in the right locations. Land at The Loan, Musselburgh, is considered a sustainable location given immediate proximity to Wallyford railway station.

Scott Hobbs Planning Consultant on behalf of Queen Margaret University states paragraph 29 of the SPP states that policies should be guided by a series of principles, the first two of which relate to economic benefit and responding to economic issues, challenges and opportunities. Again there is no reference to economic issues in paragraphs 5.2-5.4, nor in Table 4 and the preferred approach to sustainability. The LDP would, in the absence of such a reference, be inconsistent with the Sustainability policy principle in SPP. There is no justification for this position, as rather than seek to interpret the bullet points at paragraph 29 of SPP, as the MIR attempts to do at paragraph 5.4, it should simply restate the policy principles as contained in paragraph 29 of SPP to avoid any doubt in relation to this key issue.

Barton Wilmore the MIR states that the LDP should amongst other things 'prioritise the use of brownfield land over greenfield land; promote the efficient use of land, buildings and infrastructure; help secure regeneration and the creation of mixed communities; help manage the use of resources including soil. Allocation of the Scottish Fire and Rescue Service training college at Main Street, Gullane (Site PREF-N5) as a 'preferred new housing allocation' for redevelopment in the Local Development Plan will help to support redevelopment proposals for a prominent brownfield site within an established settlement boundary.

APT Planning on Behalf of Cruden Homes supports the principle of promoting sustainable development and sustainable methods of construction. We believe that the development at a suggested site at Amisfield (PM/HN/HSG032) to the east of Haddington, being able to benefit from the existing services of Haddington represents a sustainable option to deliver a significant number of

new homes to East Lothian.

APT Planning on behalf of CALA supports the principle of promoting sustainable development and sustainable methods of construction. We believe that the expansion of Drem (OTH-N11) represents a sustainable option in meeting East Lothian's future housing land supply targets.

Turley on behalf of Hargreaves UK Services Ltd and Mr R Kennedy concurs with the approach to sustainability as expressed within the MIR.

Ryden on Behalf of Wemyss & March Estate states that the MIR points out, the LDP is required by legislation, SPP and SDP policy to follow the preferred approach to this issue which is to promote sustainability and climate change mitigation and adaptation and proposals to see that these principles are in fact enacted.

George F White LLP on behalf of Mr M Steven & also Mr D Lockie agrees with the preferred approach. The proposed LDP acknowledges that greenfield sites, in efficient locations, will have to come forward to meet the strategic objectives of SESplan.

Colliers on behalf of Taylor Wimpey states that the MIR's approach to sustainability and climate change is supported. Any development proposed at Letham Mains Haddington PREF-H2 will accord with such an approach.

Chalmers & Co states that the preferred approach - promoting sustainability is welcomed. The LDP has a role to positively encourage sustainability - particularly in relation to renewable energy.

Inch Cape Offshore Ltd supports the preferred approach of the MIR on this matter, noting again the need for the LDP to acknowledge the role of and positively plan for new sustainable electricity transmission and distribution facilities as an integral component of the LDP strategy.

PPCA on behalf of Wallace Land makes representation to the non-allocation of land at Fenton Barns for mixed use, including residential development. There is no reason why the suggested site at Fenton Barns (IER ref: PM/NK/HAS114) could not be progressed as a new settlement proposal through the emerging Local Development Plan (site within the Drem/Fenton Barns Area of Search).

Community Councils and local interest groups

Prestonpans Community Council , Humble Community Council , Bolton Residents Association, Sustaining Dunbar, Common Weal Dunbar, Aberlady Conservation and History Society are all in favour of 'sustainability' as a concept, and the objectives as stated are generally good. However, it is a concept that can be used to argue just about anything, and we need the LDP to be much more realistic in its application of the principles set out regarding transportation, building design and emissions and to make development sustainable to tackle climate change.

Dunpender Community Council considers that ELC should take a lead in requesting legislative change to ensure that alternative heat and hot water sources should be installed in all new build properties by developers and that Government grants should be made available for businesses to do so.

North Berwick Community Council believes an insistence on bus companies providing more modern vehicles would help to contribute towards less climate change pollution. The North Berwick rail line is electrified allowing for low levels of pollution.

Haddington and District Amenity Society believes that the protection of prime agricultural land should be at the heart of East Lothian policy. New infrastructure should be set out as key part of the sustainable future of the County. Rail stations and their expansion and new links to stations, for example from Haddington.

Architectural Heritage Society of Scotland believes that the continued protection of any prime agricultural land should be the basis of East Lothian's future policies. The traditional buildings should be converted to other uses, as long as their authentic historic character is maintained. New and extended infrastructure are necessary and appropriate developments along road and rail routes are essential to long term development of the economy of East Lothian. A design guide for new development should be written to illustrate what is desirable, and this should be revised frequently.

Scottish Green Party East Lothian believes that the challenge will be to ensure that the good works and intentions regarding sustainability and climate change are translated into practice by future developments. Sustainability must include empowering communities to actively participate in shaping the future development of their own communities. The principles of 'resilience thinking' should inform the approach of the LDP.

Comments from members of the public

- Sustainability is not just about climate change and greenhouse gas emissions but relates more broadly to the protection and husbanding of assets that will come increasingly valuable in the long term;
- Growth of East Lothian would result in increased need to travel but compact option would minimise the number and distance travelled of commuter and leisure car journeys. The dispersed option would increase reliance on car and increase the need to travel for employment and is therefore less sustainable;
- The policy is sound but basing development around existing networks does nothing to improve the sustainability of areas away from the main A1/ECML corridor;
- Promotion of rail travel including opening of new stations should be supported regardless of which option implemented;
- There is a need for improved, cheaper and co-ordinated public transport links between settlements regardless of which option implemented;
- If compact preferred approach is implemented then there would be an inevitable increase in traffic on already congested roads e.g. Musselburgh High Street which would exacerbate air quality issues in Musselburgh;
- Build houses close to facilities such as train stations, arterial routes and schools;
- Need a variety of house types and styles;
- Housing design standards should be improved to improve energy efficiency;
- Need to encourage house builders to build passive houses;
- Need a balanced energy policy including the use of renewable technologies but these should be carefully sited to avoid damaging the attractive visual appearance of East Lothian's countryside and properties;
- Need to provide more open space within urban areas;
- Concerns regarding 'Fracking' and Unconventional Gas Extraction;
- Need to safeguard prime agricultural land to safeguard long term food supply;
- Sustainability should recognise the balance between the wish for people to enjoy the benefits of rural life vs the diminishment of this when conurbations grow too large - environmental and social sustainability can be difficult to achieve side by side;
- While the MIR identifies the issue of flood risk for Musselburgh, there appears to be no

proposals to improve coastal protection or take forward flood protection measures. The LDP should seek to address this and in particular seek to deliver some protection against future flooding for existing housing in Musselburgh;

- There should be a presumption against providing a gas supply to new developments. This should be replaced by a CHP or other renewable system built into the fabric of the development;
- Electric vehicles will be important, given the need to reduce CO₂ and the fact that there is no possibility of a high density public transport system, so there should be a strategy to ensure that all new developments, especially commercial developments, town centres, transport interchanges etc, provide adequate electric vehicle charging points;
- Continual growth is ultimately unsustainable;
- Development of existing settlements unsustainable as emissions from car use and transportation for increased numbers of residents commuting to Edinburgh would result in increased traffic flow through smaller communities, over subscription of local community services eg schools ,medical centres which will require to expand;
- MIR lacks vision;

Key Messages:

- **The Scottish Government suggest that the LDP should give due weight to net economic and social benefit and supporting delivery of accessible housing, business, retailing and leisure development. The Scottish Environment Protection Agency considers that the MIR addresses the balance that need be made between air quality and deterioration of air quality arising from road traffic emissions and CO₂. Scottish Water is supportive of locating development where there is available capacity. Midlothian Council suggest that the plan should support use of waste heat, including from facilities in MLC area (e.g. Millerhill);**
- **Network Rail suggests that the plan needs to acknowledge that in some circumstances it may be necessary to protect existing development and infrastructure from the effects of climate change, including flood risk. ELC Countryside: need to protect and where possible enhance the coast from the effects of climate change;**
- **Developers / Agents and Landowners suggest that the LDP should take ‘the presumption in favour of development that contributes to sustainable development’ (SPP 2014) into account by indicating that it will be a significant material consideration in certain circumstances. They are also of the view that the LDP should explain how the LDP will take into account the need to balance the costs and benefits of a proposal over the longer term and provide further information on how ELC intend to apply ‘the presumption’ so developers know what is expected of them. Some developers suggested that the LDP should support sustainable electricity generation and make provision for its transmission and distribution in line with associated National Development status in NPF3;**
- **Many Community Councils offer general support, but suggest concept of sustainable development can be used to argue just about anything, so the LDP needs to be realistic in its application of the principles set out in respect of building design, transportation and emissions;**
- **Members of the public who responded generally consider that:**
 - **The MIR lacks vision;**
 - **Continual growth is not sustainable;**
 - **Sustainability is also about the husbanding of assets for the longer term;**
 - **Compact growth is more sustainable than dispersed option, but although it would minimise carbon emissions from road traffic it could worsen air quality locally such as at**

Musselburgh High Street;

- **More should be done to improve the sustainability of locations away from the A1/ECML corridor;**
- **Additional rail halts should be provided and cheap public transport between settlements regardless of whichever option is implemented;**
- **Mixed use development with a variety of house types and styles and improved energy efficiency, including 'passive' design, and adequate provision of infrastructure and community facilities, including open space, will be important to securing sustainable development;**
- **There should be a presumption against provision of gas supply to new development, with CHP or other renewable systems built into the fabric of development;**
- **Need to encourage renewable energy technologies but these should be carefully sited to prevent negative impacts on the countryside and properties;**
- **Concerns over 'Fracking' and Unconventional Gas Extraction;**
- **LDP should take forward measures to mitigate flood risk, including for Musselburgh;**
- **Electric vehicle charging points should be included as a requirement of the LDP to accompany new development.**

Issue: Development Locations (Spatial Strategy)	MIR question: Question 3
Total number of responses on issue	229
Support for preferred approach	107
Support for alternative approach	56
Support for neither approach	45
<p>Scottish Government, key agencies, and adjoining authorities</p> <p><u>Scottish Government</u> – supports compact growth strategy. SPP requires spatial strategies to promote a sustainable pattern of development appropriate to the area. Compact growth appears to be the more likely to support the town centres first agenda. SPP supports a mix of uses on land within or adjacent to settlements and the reuse of any brownfield land before greenfield.</p> <p><u>Scottish Environmental Protection Agency</u> – Main Issues Report addresses the balance to be struck by maintaining air quality or ensuring no further deterioration in air quality from road traffic and preventing a significant increase in CO2 emissions. SEPA recognises this is a difficult balance to strike and prefer the compact growth strategy subject to ensuring that air quality does not deteriorate in west East Lothian e.g. Musselburgh.</p> <p><u>Scottish Natural Heritage</u> – suggests that an important part of the proposed plan will be to identify what safeguarding and enhancements of the natural environment are needed to support and enable delivery; the impact on nature and on landscape is a reason to prefer compact to dispersed growth. The proposed plan should identify opportunities for positive outcomes through green networks, active travel networks and open space provision. They are concerned that the preferred approach underplays the negative effects on landscape that are predicted in the interim Environmental Report including how those effects can be mitigated.</p> <p><u>East Lothian Council Landscape and Countryside</u> – supports compact growth. Developers must fund and help deliver infrastructure solutions. The importance of delivering the NPF3 green network is emphasised. Best quality connected open space for biodiversity, active travel and recreation will be required in an area (to the west) where there are limited existing opportunities and considerable pressure on land use.</p> <p><u>NHS Lothian</u> - LDP must ensure that concentrating so much development in the west of the area does not contribute to existing traffic congestion going into Edinburgh and that new communities are not dormitory suburbs isolated from the existing community in which they are located. The Strategic Development Area has some good transport links but this should not come at the expense of thriving local communities.</p> <p><u>Scottish Water</u> - does not have a preference over either spatial strategy and will support either one.</p> <p><u>Transport Scotland</u> – notes that trunk and local road capacity is already an acute problem in the west of East Lothian with identified capacity issues in particular at Old Craighall Junction which could present constraints to development unless solutions are identified. Potential solutions to constraints arising from cross boundary travel are being assessed following which funding and delivery mechanisms including from developer contributions will be required.</p>	

National interest groups

Network Rail – supports the compact growth strategy as the concentration of development at railway stations/transport hubs is a sustainable approach to demand. Dispersed growth would direct development to areas not served by rail infrastructure. Compact growth enables new development to fund enhancements to rail infrastructure. Developer contributions must be identified in transport assessment to mitigate against any identified transport risks.

Landowners, developers and agents

21 Landowners, developers and agents supported the preferred strategy:

Strutt & Parker for site at Drem - supports the compact spatial strategy in the short to medium term, with consideration being given to medium to longer term development at Drem.

Montagu Evans for Athelstaneford site – supports the compact growth strategy but this should not preclude small scale development in rural villages within the SDA.

Montagu Evans for Whitecraig South (pref M4) site – supports for the reasons given in the Main Issues Report.

Walker Group – important to the integrity of the chosen spatial strategy that sites in marketable locations such as Tranent are genuinely effective or capable of becoming effective and delivering homes within the LDP and SDP timescales.

Scottish Power Generation Ltd. (for site Pref-P1) – supports the compact growth strategy. There exists the opportunity to promote a mix of uses at Cockenzie identified given its relationship to the existing settlements and pattern of use.

GL Hearn for the Co-operative Group (for site at Kingslaw, Tranent) – supports the preferred strategy insofar as it seeks to focus the search for new housing and economic development land on the main settlements in the west of the SDA, including Tranent.

Gladman Developments Ltd. for the site at Lempockwells, Pencaitland – supports compact growth acknowledging the west is the most accessible part of East Lothian but the resulting spatial effect of this is a concentration of houses in the Musselburgh Cluster. There is sufficient focus on the west of SDA/ Musselburgh area which should not be pursued so rigorously to the extent the housing land supply begins to suffer. The dispersion of units over the rest of East Lothian at marketable settlements and effective sites with demonstrable housebuilder interest is also supported.

Scott Hobbs Planning for In-Site Property Solutions Ltd at Gateside East Haddington – supports the compact growth strategy as a means of supporting and promoting sustainable development but other towns in the east of East Lothian still need to grow to accommodate housing and employment.

Scott Hobbs Planning for Ashfield Land for site at Goshen Farm Musselburgh – strongly supports the compact growth strategy, the maintenance of previous land allocations and new allocations in areas which meet the sustainable economic growth aspirations of Scottish Planning Policy. These include locations closest to where demand originates and easy walking distance of established public transport provision. East Lothian Council may be tempted to consider a hybrid approach potentially increasing the proportion of new allocations elsewhere further east which would dilute the focus on the west which is the very purpose of the compact approach and would undermine the sustainability

and place-making objectives of Scottish Planning Policy. The reasonable alternative approach fails to recognise that there would be a substantial requirement for the release of greenfield land on the edge of existing settlements which, whilst not defined as Green Belt due to detached location away from the city, may have more significant landscape and visual impact than that associated with the loss of Green Belt in the preferred approach. The suggestion that a dispersed growth strategy would avoid coalescence of settlements implies the preferred approach does, for which there is no evidence.

Cardross Asset Management Ltd. – the preferred approach weights the proposed new development close to the existing main settlements.

Clarendon Planning and Development Ltd. for site at The Loan Musselburgh – supports the compact growth option which highlights the relatively small area of search as a development focus.

Clarendon Planning and Development Ltd. for Barratt David Wilson Homes – generally supports the preferred compact growth strategy and notes that SESplan permits other deliverable sites outwith the strategic development area to augment housing land supply.

Clarendon Planning and Development Ltd. for The Traquair Family for land at Old Craighall – notes the need to focus on land within the SESplan Strategic Development Area which is accessible, closest to existing employment in the city region and close to public transport. The preferred compact growth option is generally supported albeit sites further east within SDA and outwith SDA should be included if meeting SESplan criteria.

Derek Scott Planning for East Lothian Developments Ltd. land at Wallyford and Dolphinstone – broadly in favour of the compact growth option but notes the requirement in SESplan to retain and focus on the delivery of existing land allocations, including Wallyford, and that new housing land allocations must complement and not undermine the ability to develop existing allocations. The location and scale of some of the sites given ‘Preferred Land Release’ status in the Compact Growth Area will not complement our client’s site at Wallyford in any positive way. In fact they will seriously undermine our client’s ability to develop their site threatening the viability of the entire project including the delivery of key infrastructural requirements.

Turley on behalf of Hargreaves UK Services Ltd and Mr R Kennedy land at Blindwells – strongly support the preferred compact growth strategy in which Blindwells is a key component and which a greater Blindwells allocation further supports. Urge the Council to pursue this as a realistic and viable option for growth in the area. By directing development closest to Edinburgh this will derive economic and social benefits for East Lothian and strengthen the role of the city.

Ryden on behalf of the Wemyss & March Estate and Socially Conscious Capital – supports the preferred compact growth strategy and considers that it meets the requirements of Scottish Planning Policy and SESplan.

Wemyss and March Estates – supports the compact growth strategy subject to comments on rural development.

George F White LLP on behalf of Mr M Steven – supports the compact growth strategy which should be a focus for regeneration and location for housing growth and suggests that it includes Macmerry.

5 preferred the dispersed strategy:

Whitehill Lodges for land at Wallyford Toll - Green Belt is not of value in this area and land here should be devoted to other uses including tourism and other employment. Compact growth that introduces new housing at Goshen Farm threatens the tourist and recreational potential of the site therefore a more dispersed approach is probably preferred.

Rick Finc Associates for site west of Haddington – supports the dispersed growth strategy as the preferred strategy disadvantages the east of the Strategic Development Area. There is scope for more strategic development at Haddington and they do not support the heavy reliance of Blindwells, which they consider to be ineffective for the foreseeable future.

PPCA Ltd on behalf of Wallace Land Investments – support the dispersed growth strategy as a west emphasis

Landowner at Broxburn – The A1 and East Coast Mainline capacity is very good and can sustain growth towards the East of these corridors

Savills on behalf of Drygrange Estate Company Ltd. for land at Fenton Barns– supports dispersed growth as it would continue the present strategy and share development at the main settlements in the strategic development area.

18 expressed no preference:

Land owner at Dirleton - each development proposal should be considered on its own merits and the focus should be on improving, enhancing and providing infrastructure region-wide so that development is capable of being located where it has merit rather than being artificially directed into places which are already in danger of being overcrowded, where additional development will be in danger of seriously adversely impacting on the quality of life of those presently living there.

Bourne Leisure Ltd c/o Nathaniel Lichfield & Partners –Planning policy should not prevent the development of rural sites which are significant economic generators, simply due to their location beyond settlement boundaries. Should compact growth be focused to the west of East Lothian, this must not be to the detriment of the countryside, the character of the area and the tourism economy.

Geddes Consulting on behalf of Geddes Consulting on behalf of Wallace Land; Hamilton & Kinneil Estates; Wallace Land and The Sir John Hope Executry for land at Musselburgh and Wallace Land and Gladys Dale's Drylawhill Trust for land at East Linton; Hallam Land Management; Sirius Sport & Leisure – SESplan requires East Lothian to direct growth towards the whole of the Strategic Development Area. There are no environmental issues there that require a western focus for development. Road infrastructure does not require a western focus because all road traffic will reach the A1 at some point. School expansions should be achieved by determining preferred education solutions and matching growth to accommodate local solutions. The Council should merge the two development strategies to maximise the development opportunities needed to meet its housing land requirements over each plan period. Land releases should be located where there is available infrastructure or where infrastructure solutions can be financed through the development process and should apply equally to any of the East Lothian Cluster.

Geddes Consulting on behalf of Lothian Park Ltd. for a site south west of Old Craighall junction - Given the scale of the Council's economic growth targets and the scale of the economic land supply

to be maintained the Council should merge the two development strategies to maximise the development opportunities needed to meet its housing land requirements over each of its plan periods. The greatest opportunity to secure further economic growth is within the Musselburgh Cluster Area, close to the City of Edinburgh and easily accessible from the City Bypass. Lothian Park is welcomes the allocation of 5.2ha of land for employment at Old Craighall which is an effective site.

Geddes Consulting on behalf of T G Tait & Sons - no comment.

Persimmon Homes - Providing the largest choice of sites, and to ensure a sufficient allocation is made which includes the 20% generosity allowance as required by SPP (Paragraph 116) is vital. This will provide a sufficient choice of sites spread across the entire of East Lothian, helping to improve competitiveness and maximising supply within each cluster area. The Preferred approach should be considered alongside the alternative, but allowing for sites within the alternative strategy as ones which should be considered as a high priority at the next review of the plan, or even as strategic opportunities which cannot come forward until a defined date.

Barratt David Wilson Homes - the East Lothian Strategic Development Area extends along the whole of the A1 corridor and includes East Linton which is close to both A1 road and, potentially, rail. There is clearly a need for other SDA settlements within the eastern area to accommodate further growth if housing requirements are to be met. Consideration should be given to the dispersed growth option (including non-SDA sites).

Dr David Slight - SESplan allows for greenfield sites outwith SDA's to come forward subject to impact on settlement character, Green Belt objectives and infrastructure availability. Ormiston is well-located on edge of MIR preferred 'Compact Growth' area and can accommodate further growth.

George F White LLP on behalf of Mr D Lockie – unclear whether MacMerry is included in the compact growth strategy area. MacMerry is in the Strategic Development Area and is a suitable area for growth. The west of East Lothian is served well by frequent transport and should be a focus for regeneration and opportunities to release appropriate green field land to support the significant need and demand for housing.

Community Councils and local interest groups

Musselburgh Community Council - opposed to the preferred option of compact growth and support dispersed growth throughout the rest of East Lothian. Particularly concerned about the impact of a substantial development around Musselburgh.

Prestonpans Community Council – opposed to the compact growth strategy. Development should not be 'shoehorned' into the west with the resultant overturning of good planning practice this would require. Musselburgh will not be able to cope with the increased traffic. Development to the immediate east of Musselburgh, including around Bankton House and the west of Prestonpans (apart from the consented development at Wallyford) inevitably involves transport, pollution, coalescence, loss of prime arable land, loss of historic value and other intractable problems which makes them wholly unsupportable. Road and rail infrastructure is currently over capacity and until there is a solution sites east of Musselburgh should not be allocated. Goshen does not relate to East Musselburgh or Wallyford; it was not allocated for development in 2002 and many of the same reasons for not doing so remain today. It is not supported for development. Land that has a risk of flooding should not be allocated. Support for development to the west and south west of Musselburgh and some land suggested for employment here should be for housing instead.

Cockenzie and Port Seton Community Council – supports a dispersed strategy along the A1 corridor to reduce the impact on green belt land, likelihood of coalescence of settlements and reduce traffic congestion and air pollution

Haddington Community Council – supports compact growth strategy. This will retain Haddington’s rural market town feel.

Ormiston Community Council – supports compact growth as it focuses development in settlements with existing infrastructure; the alternative would result in an adverse impact on the landscape setting of settlements in rural East Lothian outwith the green belt.

Pencaitland Community Council – support the compact growth strategy for reasons given in Main Issues Report

Humbie, East and West Saltoun and Bolton Community Council – supports the compact growth strategy to locate people closer to employment in Edinburgh and minimise overall transport movements but concerned at the loss of prime quality agricultural land and that the compact strategy favours large national builders rather than supporting the local economy through small local builders.

Gullane Area Community Council – favours compact growth and are concerned that significant development in the North Berwick cluster area would adversely affect the amenity of this area.

Dunpender Community Council – supports compact growth across East Lothian, but opposed to large scale development at Eweford at Dunbar. Support some small growth in small communities but only minimal development at Spott, Stenton and Innerwick due to lack of basic facilities and the resultant increase in car use.

North Berwick Community Council - Development needs to be where main employment and existing transport links are to be found. i.e. along the A1 corridor in the west of the county where opportunities for transport and employment are stronger. Trains already operate at capacity.

Dunbar Community Council – favours compact growth to locate new housing close to actual and potential employment site to reduce travel. Infrastructure in west can cope with significant new development. New housing development should better reflect the population demographic and not just be family houses. Support small scale local development to rejuvenate communities even in outlying villages. Query the reason for leaving the northern coastal area out of the proposed development band.

Musselburgh Area Partnership – supports the alternative dispersed growth strategy. Compact growth would encourage the further ‘saturation’ of Musselburgh and bring unmanageable pressures on local infrastructure. The local development plan should give other communities the opportunity to thrive by directing development elsewhere.

Fa’side Area Partnership – split on whether to support compact or dispersed strategies. Accepts that Tranent must take some of the housing allocations but infrastructure investment must follow allocation. To reduce traffic in central Tranent a bypass link to re-route traffic to the A1 is supported. Need for more affordable housing and for housing for the elderly. Would support locations such as Haddington and Drem to alleviate some of the density of the compact strategy without dispersing sites all over East Lothian.

Preston Seton Gosford Area Partnership - Although no strong opposition to the preferred compact growth strategy, the Area Partnership prefers the dispersed strategy. Despite the availability of infrastructure quality of life in the west is a key consideration. Although the demand or market is not to the East at the moment, perhaps directed development would encourage this.

Dunbar and East Linton Area Partnership – support compact growth strategy as infrastructure is available in the west and less impact on prime quality agricultural land. Opposed to site Alt D-1 (Eweford, Dunbar) due to resultant coalescence between Dunbar and West Barns, lack of crossings over the railway loss of prime quality land and of a wildlife corridor at Lochend Woods.

Haddington and Lammermuir Area Partnership - supports compact growth to allocate development where there is most demand and to reduce the impact on landscape elsewhere in East Lothian. Must deliver affordable housing. Should not diminish the potential for economic growth in Haddington.

North Berwick Area Partnership – generally supports compact growth because it questions whether dispersed growth is a viable option if there is insufficient infrastructure. Is also concerned that a compact growth strategy would magnify a east-west split which might result in the neglect of resources in the east if all development is focussed west. Transport capacity is a key issue.

Musselburgh Parish Grouping of the Church of Scotland – support compact growth as the west is the location of choice for incomers but all development must ensure adequate road and education provision, preserve settlement identity and resist coalescence.

Association of East Lothian Day Centres – support compact growth as it minimises travel and resultant environmental impact. Blindwells, including eastwards growth, is crucial to medium and long term growth.

Dirleton Village Association - concerned that significant development in the eastern section of the SDA would put an unacceptable strain on the infrastructure of the coastal plain, from west of Dunbar to east of Longniddry, and thus adversely affect the amenity of that area. Do not support large scale development in the Drem/Fenton Barns area.

East Lothian Agricultural Discussion Society – Favours dispersed growth and supports Drem as a location for new development. Drem, Whitekirk, Athelstaneford and Garvald should be expanded to support a local shop and primary school. Sustainable growth should be supported in these villages because there is capacity in local primary schools.

Sustaining Dunbar, Common Weal and Scottish Greens – support compact growth as new development should be located as close to Edinburgh as possible where transport and drainage infrastructure exists.

Haddington & District Amenity Society – support neither option but support development east of Musselburgh and at Haddington and note that could be key to the future of East Lothian as a new regional centre.

Aberlady Conservation and History Society – Significant development in the eastern section of East Lothian would adversely impact on the countryside settings of communities like Aberlady, their amenity and tourism value, and the infrastructures available to support significant development. Development arising from housing demand from Edinburgh that has to be met in East Lothian should be met as close to the city as possible to avoid unnecessary traffic and journey time increases.

Bolton Steading Residents Association – suggest that long term housing forecasts are unreliable and lack credibility. Support a dual approach of limited compact growth and dispersed growth. Haddington requires selective new housing to support its declining town centre. Concern that locating more development in the west will benefit the economy of Edinburgh and could lead to boundary readjustment in favour of the city.

Dunbar Shore Harbour Neighbourhood Group – support compact growth but wish it to properly address the expressed anxieties of other Tenants and Residents Panels in respect increased levels of inequality, poverty, crime and urbanisation in the west of East Lothian.

Goose Green Tenants & Residents Association Musselburgh –support dispersed growth strategy. Compact growth would exacerbate inequality, poverty, crime and urbanisation in the west. Long term infrastructure upgrading to deliver the dispersed strategy would benefit East Lothian.

Musselburgh Grammar Parent Council – support dispersed growth. Would be very difficult for Musselburgh to cope with 4,700 new homes and the associated influx of people.

Stoneyhill Primary School Parent Council – support dispersed growth which would provide far more opportunity for economic development and regeneration for smaller towns and communities across the area. (The compact model would appear to do little more than encourage economic growth for Edinburgh.) The dispersal model would ensure developments are ‘future-proofed’ and will allow for the further growth that will inevitably be required post 2024.

Ravensheugh Tenants and Residents Association (includes a petition of 53 residents) – support a dispersed growth strategy. Compact growth would exacerbate inequality, poverty, crime and urbanisation in the west with associated environmental harm and lack of access to medical facilities. The compact growth strategy will have the undesirable effect of coalescing towns and villages in the west of East Lothian and adversely affect the historic interests of East Lothian.

The Coastal Regeneration Alliance (including 102 pro-forma letters) – compact growth strategy risks removing much of the public and amenity land for existing communities. Large scale housing development is incompatible with the creation of a large potentially industrial site and port between Cockenzie, Prestonpans and Tranent and into the Forth and with the dense residential strategy being proposed under the Plan or with the existing rural residential nature of the area.

Members of the public

Support Compact Growth:

- Concentrating development close to Edinburgh and to transport and water and drainage infrastructure is the best option
- West of East Lothian is location of choice for incomers
- Better and quicker transport connections to Edinburgh
- Reduces the impact of distant commuting to Edinburgh and helps to sustain the rural amenity in the rest of East Lothian
- It is the least bad option given the objectives and the many constraints
- East Lothian must remain distinct from Edinburgh
- Most employment is in Edinburgh and it is more environmentally friendly to have the housing close to the city
- Easier and cheaper to provide infrastructure and services in a compact area

- But must maintain green spaces and corridors in the west too.
- Housing and employment must go together in the west for it to be a success
- Other places such as North Berwick do not have the road or rail capacity to cope with significant development
- Minimises traffic pollution
- Development should be close to transport arteries and employment
- Coalescence needs to be avoided
- But villages should be protected
- The west is where most people want to live
- Areas with already large populations should be able to absorb new housing developments more easily
- Compact growth should take the pressure off 'East Lothian's high quality environment'
- But land for development should not be allocated outwith the Spatial Development Area
- West has more regeneration opportunities
- Large scale development could be extremely damaging to the landscape of much of the eastern part of East Lothian
- Support conditional on the infrastructure being put in before development begins and that transport and traffic management and alternatives to car use are addressed – this was not addressed in recent housing development in Musselburgh and Prestonpans and has led to air pollution. Less through traffic is needed in Musselburgh
- Dispersed strategy would put pressure on all the towns involved and infrastructure may not be deliverable
- Even moderate growth in the east will place an intense impact on travel routes heading west
- Strong support for a new settlement at Blindwells – strong positive move to avoid destroying existing towns
- But prime quality land should not be used
- Recognises that growth in Edinburgh's population is driven by the Edinburgh economy
- Capacity of Haddington to support further major expansion after Letham is questionable
- The need to preserve agricultural and tourist interests in the east should be given high priority
- The ideas of Compact growth, a transport corridor and the recognition of principles for the countryside around towns do a lot to reconcile the need for growth with the preservation of East Lothian's magnificent coast, countryside and village tourist and natural environment.

Support Dispersed Growth:

- Settlement identity requires preservation
- Settlement coalescence must be resisted
- Spread the housing along the A1 corridor instead of all in the Musselburgh area
- Spreading the development will also lead to increased spending power in more areas
- Roads will not cope with large amounts of housing in one place
- The western area of East Lothian could become one big conglomeration
- Green space in the east of East Lothian is no more precious than that in the west likewise
- Existing infrastructure is not a strong enough reason to shoehorn a disproportionate amount of housing in to the west of East Lothian. Compact growth could lead to disparity in the county.
- East Lothian has unique historical towns with their own character that should not be lost
- Already too many houses in the west of East Lothian
- Dispersal would minimise the impact on existing settlements
- There are plenty of smaller towns and villages which would benefit from a small amount of growth not just on the A1 corridor but also close to the A68

- Please do not destroy the west of the county. The citizens and communities do not deserve to have their environments ruined and their quality of life severely affected.
- Community infrastructure at Tranent is already stressed, areas further east could accommodate some development
- Development should be concentrated at locations with a rail station throughout East Lothian
- Musselburgh Tranent and Prestonpans could become suburbs of Edinburgh with such high increases in housing
- Lack of available housing in the east leads to higher house prices there
- A wider mix of social housing and affordable developments across the county should be encouraged, rather than being concentrated in the West
- A more focussed integration of mixed use developments across the county will be more sustainable in the long term.
- Would be wrong to let Old Craighall, Millerhill and Shawfair merge into one gigantic housing estate
- More housing in Musselburgh would have a disastrous effect on congestion and traffic pollution in Musselburgh and on other services within the town.
- A single secondary school must be maintained within Musselburgh to maintain a singular sense of community and avoid inter school rivalry and the disorder that may result.
- No cognisance of the quality of life
- Need a more robust transport infrastructure throughout the whole of the county to spread the population in such a manner that provides a quality of life for individuals and a community focus only available in smaller settlements
- Towns and villages in the West of the County will form one large sprawl and the heritage and individuality of each settlement will be lost
- no proposals mentioned to cater for the increase in numbers of elderly residents requiring full support
- Tranent does not have a rail station.

KEY MESSAGES

- **Key agencies generally support the preferred compact growth strategy, though SNH highlight its effect on landscape, subject to a number of caveats such as identifying solutions to transport capacity, air quality, and provision of good quality open space and green networks.**
- **Network Rail supports the compact growth strategy.**
- **More landowners, developers and agents prefer the compact growth strategy than the alternative dispersed growth strategy but a significant number believe that a combination of both will be required to deliver the housing targets including generosity allowances.**
- **Of the Community Councils who responded Musselburgh, Prestonpans and Cockenzie supported the dispersed growth strategy and Ormiston, Pencaitland, Humbie/Saltoun/Bolton, Gullane, Dunspey, North Berwick, and Dunbar supported the compact growth strategy.**
- **Dunbar/East Linton, North Berwick and Haddington/Lammermuir Area Partnerships support compact growth and Fa'side was undecided. Musselburgh and Preston Seton Gosford supported dispersed growth.**
- **Most, but not all, local interest groups in the east supported the preferred compact growth strategy and most, but not all, in the west supported the dispersed growth strategy.**
- **Of the individual responses by members of the public many more supported the compact growth option citing the proximity of the west to where demand arose for both housing and employment and infrastructure was generally available/could be made available. However**

there was general concern that settlements in the west should not lose their identity or coalesce and concerns over transport capacity and environmental issues. Development further east was generally seen as potentially harmful to the high quality environment of East Lothian and the character of smaller settlements including their landscape setting. Of those who supported dispersed growth it was seen as a fairer option amid concern that compact growth could lead to disparity. There was strong support for Blindwells as a location for growth.

- Of the submitted pro-forma letters and petitions, 53 people signed a petition organised by Ravensheugh Tenants and Residents Association supports a dispersed growth strategy. 102 other pro forma letters expressed concerns about a compact growth strategy and a letter from 52 Aberlady residents supports the compact growth strategy for transport, economic development, environmental and demand reasons.

Issue:	MIR question:
Town Centres	Question 4
Total number of responses on issue	139
Subject to the ability to expand Blindwells, do you support the introduction there of a new town centre (preferred approach)	
Total number of responses on issue	114
Support for preferred approach	98
Support for alternative approach	16
Are you supportive of Blindwells new town centre? If so, should it serve a new settlement or the new settlement and a wider area?	
Total number of responses on issue	99
Support for preferred approach (new settlement and a wider area)	54
Support for alternative approach (new settlement only)	45
Do you support the retention of the current network and hierarchy of existing centres (preferred approach and reasonable alternative)? Please explain your answers. If you support neither the preferred approach nor the reasonable alternative, what alternatives do you suggest?	
Total number of responses on issue	102
Support for preferred approach	71
Support for alternative approach	15
Support for neither approach	16
The intention is to prepare strategies for each town centre, what ideas do you have for improving your town centre (please specify the town centre you are referring to in your answer)?	
Total number of responses on issue	90
Scottish Government, key agencies, and adjoining authorities	
<p><u>Scottish Government</u> – the Proposed Plan should recognise the role of town centres in supporting a diverse economy, as hubs for a range of activities and reference and promote the town centre first principle. It should embody the Scottish Planning Policy Principles on Town Centres. The Council should consider whether it can complete town centre health checks and strategies in time for the spatial elements either be included in the Proposed Plan or include an express reference to supplementary guidance. It is appropriate for Blindwells to include a new town centre to support the new community and to help it become a sustainable mixed community; the creation of mixed use neighbourhoods with well connected street patterns that encourage walkable neighbourhoods with a higher density vibrant core is supported.</p> <p><u>Scottish Natural Heritage</u> – supports connectivity that supports walking and cycling to and through town centre(s) at Blindwells. Notes the implicit strong relationship between the approach to town centres and the preferred strategy of promoting sustainable development through appropriate location of development and integrated land use and transport. Notes there are also benefits in retrofitting green infrastructure elements in existing town centres to improve future resilience and quality of place.</p> <p><u>Scottish Enterprise, SEPA, Transport Scotland, NHS Lothian, Scottish Water</u> – no specific comment <u>ELC Landscape and Countryside</u> – Blindwells town centre should support the new settlement and the wider area. Supports the current network and hierarchy of town centres. If Blindwells town centre is</p>	

to support the area beyond the Blindwells boundary, there must be adequate non-vehicular access to Blindwells from surrounding settlements and countryside. Current access provision is not adequate and must be enhanced, ideally with a road/rail crossing to the north and a bridge over the A1 linking to Tranent.

National interest groups

Scottish Wildlife Trust – Blindwells town centre should serve Blindwells and the wider area. Supports present hierarchy of centres. Respondent has mobility issues; shopping in Haddington has become an ‘extreme sport’ – and by choice goes to Fort Kinnaird or Straiton.

Landowners, developers and agents

Landowner, Dirleton – does not support a new town centre at Blindwells. The county does not need additional retail units. Promoting additional (unnecessary) consumption is incompatible with aim of sustainable development. Existing town centres not fully utilised (vacant shops/excess of charity shops which do not contribute to the Council's financial resources via business rates). Better to promote existing centres than build a new one which would (for a while) suck the life further out of existing town centres.

Whitehill Lodges for site at Wallyford - We would like to see existing town centres within Prestonpans supported as this benefits local provision. Not convinced that a new town centre needed in East Lothian or that Blindwells is the best location. Prestonpans town centre needs to be supported and a new centre would simply increase competition.

Rick Finc Associates (for the site they term 4FD west of Haddington) - client does not believe there is an effective or deliverable solution to expand Blindwells with a sustainable town centre. Supports retention of the current network and hierarchy of town centres. Haddington could facilitate a ‘higher order’ town centre instead to claw back expenditure leakage. Haddington should be a key focus of any town centre strategy/hierarchy going forward and should include provision of local/ neighbourhood centres, particularly at Letham Mains expansion.

Geddes Consulting for Hamilton & Kinneil Estates; Wallace Land and The Sir John Hope Executry; Wallace Land and Gladys Dale’s Drylawhill Trust; Wallace Land; Hallam Land Management; Sirius Sport & Leisure - Blindwells should include a new town centre to serve its own needs and avoid adverse impacts on the viability and vitality of neighbouring towns.

Persimmon Homes – support existing hierarchy of town centres. New town centre unnecessary but if Blindwells is to be expanded a town centre is sustainable but could have negative effects on existing centres. It should not attract people from a wider area; this would add to traffic pressures. Proposed Plan should ensure existing town centres remain viable and accessible.

Cardross Asset Management – supports preferred approach. Blindwells has considerable issues with viability therefore premature to consider any town centre status there pending resolution of delivery. All major opportunity sites at Cockenzie should be considered for retail.

GVA James Barr for Ediston Real Estate; J&W Jenkinson – Retail expenditure leakage from East Lothian to retail parks at Edinburgh should have been addressed by providing appropriate alternative commercial and retail provision for the East Lothian catchment. A Retail Capacity Study and resultant town centre strategies will not address retail land requirements outwith town centres. Haddington is growing and has an identified need for more retail land outwith the town centre (2009

Retail Capacity Study/ identified a need for additional 5,600 sqm). Town centres, especially Haddington, have limitations due to their historic nature and few brownfield opportunities therefore additional retail development is needed outwith their centres. This can benefit the town centre as well as reduce overall expenditure leakage and the need to travel.

Turley on behalf of Hargreaves UK Services Ltd and Mr R Kennedy - supports the introduction of new facilities to serve any new community at a Greater Blindwells. The current Planning Permission in Principle (PPP) application proposes a new local centre for 1600 units. The level of centre proposed in any forthcoming LDP should be proportionate to that allocation and should serve as large an area as possible. Any new town centres should reflect the changing nature of the retail environment and retailer requirements.

George F White LLP on behalf of Mr M Steven - a new Blindwells town centre would mitigate against further traffic congestion in existing town centres, such as Tranent; therefore other planned housing developments in nearby settlements would be supported by the service provision provided by Blindwells

Chalmers and Co.- Haddington town centre would benefit from the re-opening the train line to Haddington to lower the need for car transport. Suggests a more visible political group associated with towns - akin to having town mayors? Haddington's Vision work in 2012 produced good ideas but has not worked. Some outside inspiration to progress ideas and local accountability to ensure follow-up with buy-in from the council would be welcome. Questions whether there are adequate incentives for businesses and local government to join together to inspire and follow-through with change.

Rick Finc Associates for MJ and V Rennie Trust - The community of Dunbar and its residents would benefit from improvement to the existing town centre. Supports retention of the current network and hierarchy of existing centres which would make all sites in Dunbar more marketable. Furthermore, the reasonable alternative is consistent with the Scottish Government's Town Centre First Principle.

Rick Finc associates for Hallam Land Management site west of Prestonpans – A new town centre at Blindwells will impact on Prestonpans town centre and it is suggested that the proposed Retail Capacity Study and Town Centre Strategies should be prepared as part of the LDP process, or as SPG. Supports the maintenance of the existing network and hierarchy of town centres as this will maintain the attractiveness of the area as well as improving the marketability of housing sites.

Jigsaw Planning – the ASDA store at Dunbar and neighbouring additional uses provide a community hub. Seeks to have this recognised in the Proposed Plan as either a District Centre or Commercial Centre in the retail hierarchy to allow it to have a clear position in the retail hierarchy and have a protected status within retail policy with recognition of its contribution to the catchment population.

Community Councils and local interest groups

Prestonpans Community Council – supports a new town centre at Blindwells which should only serve the new settlement but be planned for expansion beyond 1,600 houses. Supports the current network and hierarchy of town centres and wants more focus on reviving historic town centres. Suggests a Charrette for Prestonpans town centre.

Gullane Community Council – supports a new town centre at Blindwells which should serve the new settlement and a wider area. Supports the current network and hierarchy of town centres. North

Berwick town centre which also caters for tourists has limited parking capacity and traffic circulation problems that require resolution.

Cockenzie and Port Seton Community Council - supports a new town centre at Blindwells that should only serve the new settlement otherwise it could create traffic problems. Do not support major retail parks as they would be out of character with East Lothian and draw business away from local shops. Wish to see new buildings more in keeping with their surroundings and old buildings preserved rather than redeveloped.

Dunpender Community Council – supports a town centre at Blindwells for the new settlement. East Linton should have a town centre strategy to make it a place for people not just a through route. Heavy goods vehicle traffic is a problem in the town centre. Pavements and road markings that reflect the rural look of the village should be put in place, instead of one style fits all. Requests a conservation area character appraisal urgently. Suggests replacement window policy should permit uPVC instead of wood and parking on the southbound side of the proposed station to be allocated.

Dunbar Community Council - Dunbar's town centre, seafront and harbours are an asset to the community both in respect of amenity and economy. Development should impact positively on the High Street and the historic town, whilst respecting the value of the conservation area. The Proposed Plan should prioritise sensitive development of brownfield sites, placing pressure on owners who have long held vacant/derelict land/buildings, to build high quality housing and small high tech work units as well as public open spaces. Redesignate Lamer Street housing site for community open and recreational use; redesignate Friarscroft for housing use; housing use at Assembly Rooms gardens and mixed housing and workshop use at High Street backlands allowing for a less conservative approach to design solutions.

Ormiston Community Council – town centres are an important part of East Lothian and investment should be made to enable people access services and shop locally. Blindwells should have its own town centre but this should not be at the detriment of other town centres such as Tranent and Haddington which should be able to retain and enhance their offer through on-going investment.

Humbie, East and West Saltoun and Bolton Community Council - does not support wider development of retail activities at Blindwells given the proximity of Fort Kinnaird/Edinburgh and the increase in on-line shopping. Blindwells town centre should serve its own needs. For Haddington, no need for additional retail space other than for smaller retailers. Retail facilities in Dunbar are readily accessible. Growth of on-line shopping means a reduced need for such outlets. Haddington town centre requires parking and traffic issues addressed urgently. Rural communities are car-dependent; parking is therefore essential for accessing public transport, local amenities, doctors etc. Suggest cinema/other leisure activities particularly for younger people required to reduce trips to Edinburgh.

North Berwick Community Council – Blindwells town centre should serve its own area and in time the wider area also but feel strongly that a recognisable town centre is needed for a community to thrive and develop its own distinct character.

Dunbar and East Linton Area Partnership – considers that Dunbar town centre could be improved and the housing density requirements met by allowing high density development near the High Street and therefore close to public transport, including by refurbishment of derelict buildings.

Musselburgh Parish Grouping of the Church of Scotland – Blindwells town centre should serve the

new settlement and the wider area. The key issue in Musselburgh town centre is traffic volume on the High St and air quality along it.

Association of East Lothian Day Centres – Blindwells should serve not only the township but also the surrounding area. The possibility of an out of town retail/commercial centre should be explored due to the close proximity of the A1 and Edinburgh. Other town centres need regeneration and a study of all these should be undertaken. Control of the number of charity shops in a locality is essential to a vibrant centre. Incentives to attract new businesses to town centres should be explored in order to achieve high occupancy rates and also to generate income for the Council.

Dirleton Village Association - supports a new town centre at Blindwells which should serve the new settlement and a wider area. Supports the current network and hierarchy of town centres. North Berwick town centre which also caters for tourists has limited parking capacity and traffic circulation problems that require resolution. Most Dirleton residents now shop in North Berwick as Dirleton no longer has a shop. Other services, such as medical provision, are also known to be under strain.

Sustaining Dunbar – Blindwells town centre should serve the new settlement's own needs. Town centres must be recognised as residential areas, workplaces and social hubs as well as retail centres, primarily focussed on meeting local needs. Locally owned, independent retailers provide significantly more local economic benefit, through the local multiplier effect, and should be encouraged over large retail chains. Large scale retail outlets and car parks should be avoided.

Common Weal Dunbar - The LDP should encourage diversity and support local retailers within the existing town centres rather than encouraging travel to out of town shopping centres. Dunbar Town Centre currently has several empty retail units that should that should, in the absence of retail lessees be made available to local charity and community groups as space to meet and/or raise funds. Pop-up shop operators on the High Street should be encouraged.

Scottish Green Party - Town centres must be recognised as residential areas, workplaces and social hubs as well as retail centres, primarily focussed on meeting local needs. Locally owned, independent retailers provide significantly more local economic benefit, through the local multiplier effect, and should be encouraged over large retail chains. Large scale retail outlets and car parks should be avoided.

Haddington & District Amenity Society – supports a town centre at Blindwells for the new settlement. Blindwells would be too close to Edinburgh and the town centre offer at Fort Kinnaird and would lead to further unnecessary congestion and traffic movement to the west of the County. A strategic town centre alternative would be Dunbar as this could serve town centre and the wider County business requirements too. Support the retention of the current network of centres, but the hierarchy should be reviewed more fully. Haddington does not and perhaps should not provide the same offer and role as a town centre as North Berwick, for example. These centres are not all the same and should be supported with policies that are tailored to their particular needs.

Bolton Steading Residents Association - given the proximity of shopping at The Fort in Edinburgh, Musselburgh and the Jewel do not see the need for a large retail development at Blindwells.

Tranent and Elphinstone Community Action Plan Working Group – want to see a more vibrant Tranent Town Centre with better shopping, more parking, and improvements to reduce traffic volume/ improve through traffic flow before additional housing is built. Feel local services are already at capacity and an increase in capacity needs to happen in tandem with new housing being built – not afterwards. Concern that the compact growth option will exacerbate issues that are

already prevalent in the area; people using the town as a commuter belt for Edinburgh; lack of Community feel and separate identity of the town.

Members of the public

Promote a new town centre at Blindwells and maintain the current network and hierarchy of town centres: 57

Maintain the current network and hierarchy of town centres: 11

Neither: 5

Blindwells town centre should provide only for its own needs: 30

- This would safeguard local services in existing towns and villages
- Would avoid encouraging road use
- Not large enough to accommodate a new centre for East Lothian and potentially east Edinburgh and Midlothian or compete with Fort/Straiton

Blindwells town centre should provide for its own needs and those of a wider area: 48

- A retail park for East Lothian is supported in the longer term
- Makes sense to have one large development with up to date facilities which are fit for purpose
- Supported but needs a proper interchange on A1
- Opportunity should be taken to provide other facilities that will be used by the surrounding settlements; may reduce people travelling to Edinburgh and retain funding in East Lothian
- Should be a hub that contains all primary services and space for independent retailers; space should also be set aside for social/recreation (indoor and outdoor) within the town centre

Alternatives:

- A better strategic Town Centre would be to the East of the County - maybe at Dunbar
- Any new town centre would inevitably serve only the local community who would go to Musselburgh or Edinburgh for their main shopping needs. The growth of internet shopping makes the case for a significant new town centre shopping area a dubious one.
- Commercial centre at Blindwells is unnecessary due to proximity to Kinnaird Park

Town Centre Comments

General:

- Support the retention and improvement of existing town centres to sustain community life; maintain their individuality and vibrance; encourage local shopping and reduce travel
- All the town centres in East Lothian need pleasant to walk in, with better pavements, clean streets, and cutting/pruning of bushes & trees to let light in & provide safe walking
- Important to improve / maintain the quality of town centre shopping/ amenities as opposed to encouraging out of town developments
- Out of town developments are the death knell to high streets.
- A sense of community is encouraged by having nice town centres, it encourages more small local businesses and fewer miles driven
- Towns work best when they find their own character and purpose incrementally over time and when they are supported through thoughtful planning control and targeted finance
- Applaud the very positive improvements made to townscape fabric in Dunbar and Haddington through Townscape Heritage Initiative and should be extended to other towns
- Get people to shop locally is a reasonable proposition
- Some businesses are unviable and there is too much emphasis in supporting these and

others undermine High Streets as good places to live

- Resident associations for High Streets to ensure that traders don't wreak havoc
- Greater emphases on protection of the Conservation Areas; policies for vernacular and listed buildings must be properly enforced
- Proper stewardship of the built heritage should be vested in a community based body such as a Heritage Society.
- Greater emphasis on good old fashioned civic gardens, that appeal to mature audiences not five year olds, with quiet areas that are free of play park type infrastructure
- Trees should replace some of the traffic infrastructure; pocket parks and public amenity created instead of the alienation of ever more car parks.
- Expansion of towns will not regenerate town centres
- Should aim to keep vehicular access to the centre of the towns to a minimum; car parks to be away from the centres, but would result in a more vibrant and pleasant town centre
- Improved active travel routes
- Improved bus connections between towns
- Reduce traffic speed in all town centres and approaches
- Town centre strategies should include more imaginative solutions to transport infrastructure problems than are currently proposed
- More effort should be made to actively develop shopping experiences in local towns such as Haddington, providing a greater range of shops to complement existing specialised shopping, thus retaining more business within East Lothian and reducing commuting to commercial centres
- Curtail vehicle movements in town centres by charging for parking, narrowing streets to make double parking impossible, reduce speed limits to 20mph where people live and shop
- Reuse dormant property; reduce rates to encourage occupancy

Musselburgh town centre

- Restore and transform the Old Town Hall in Musselburgh in to a flagship museum, small business and community facility
- Move the secondary school out of the town centre
- Allow larger retail units to subdivide and change use, rather than stand empty
- Work to bring upper floors back in to use
- Create things to do and places to see around the town as well as places to shop
- Create a Civic Square with cafes etc.
- The Musselburgh Town Centre Strategy publicly focused on the creation of a pedestrianised town centre civic square that did not materialise and is now just a revamped car park; do what was agreed in the first place and provide a pedestrian square
- Build capacity in our local Councillors so that they work together for the good of the town
- Capture the energy provided by the River Esk and use as a catalyst for Musselburgh to become East Lothian's greenest town
- Prevent Musselburgh being a through route to vehicular traffic other than public transport; it is now as congested as it was prior to the bypass being built.
- Reduce through traffic for reasons of public health, environment and encouragement of use of local shops
- Measures to reduce commuter vehicles using Musselburgh town centre as an access to public transport to Edinburgh urgently required
- Time has come to re - introduce the plan for a congestion charge in the wider Edinburgh area; requires a strategic approach by the constituent local authorities
- Traffic congestion & air pollution in the centre of Musselburgh must be reduced; traffic must

be routed elsewhere to encourage footfall; siting major retailers such as Tesco in the centre of the town is misguided - it neither helps local trade nor traffic congestion & pollution

- Promote quality retail and town centre living
- Subsidise places for cultural and heritage use

Tranent town centre

- Tranent needs new roads to take through traffic away from the High Street
- More pedestrian areas in town centre
- Town's attractive old buildings need repaired; grants to improve the exteriors of many of the buildings would help
- Particular care should be taken to conserve the built heritage of Tranent
- Encourage more business into the town centre to fill empty shops
- Lacks a community centre which given the current rate of expansion of the town could surely be addressed by the next round of housebuilders
- Needs a family friendly cafe /community centre
- Needs parking improved so it is possible to stop and use the shops
- Improve the quality of public areas; more public paths connecting to other towns

Prestonpans town centre

- Would benefit from major investment in recreational and environmental strategies
- Relate the high street to the sea front, reduce traffic flow and speeds through the centre
- Poor quality and inadequate range of shops, including supermarkets; too many take-aways
- Range of shops is narrow with several empty sites
- Area around Ayres Wynd junction is untidy and containment of refuse is poorly managed
- Improve the shore to attract visitors

Haddington town centre

- Haddington retains a range of local shops selling good quality products
- The shops are uninspiring compared to other towns in the Borders and Lothians
- High street is desperately in need of regeneration, there are many opportunities to improve the facilities, shops and to make both more family friendly and inviting
- Investment in the town centre imperative, it is a ghost town with nothing to do on a Sunday
- The library is the only decent child based activity
- There is too much dog poo in the parks and on the streets
- Parking is a biggest constraint but needs managed while maintaining the traditional character of the town centre
- Town centre would benefit from more parking and less through traffic
- More rigorous implementation of conservation policies is required
- ELC should consider the possible benefits of a strategic relocation of its own staff currently based at Macmerry to Haddington, to reinforce the sustainability of Haddington as a town centre.

North Berwick town centre

- North Berwick town centre would be hugely improved if it were pedestrianised
- Consider repaving the High Street to be shared space for vehicles and pedestrians
- Limit vehicular access to North Berwick High Street

- Too much illegal parking and anti-social driving behaviour; also a potential for pollution in the summer months
- Don't concrete over grass for car parks for hot summer days; more freezing days with plenty parking
- Parking needs to be addressed. It therefore does not make sense to allow development of town centre sites for housing - they should be allocated for parking
- Town centre would benefit from more parking and less through traffic
- Consider allowing parking on the north side of Beach Road to allow beachgoers to park without taking up spaces better served for shoppers in the High Street
- Reinstate the link between the Lodge and Law Road
- Limit number of charity shops to a proportion of the total retail space to minimise unfair competition

Dunbar town centre

- Many buildings need cleaned up (should be compulsory for a conservation area)
- More street trees and seating
- Better signage and direction for parking
- Better cycle provision including cycle parking
- Improve walking and cycling access to town centre
- Formalise desire lines to/from railway station
- More cultural provision as The Brunton is pretty much inaccessible by public transport from Dunbar therefore cannot be said to serve the county and no 'theatre' style venue in Dunbar
- Provide integrated high quality housing and small workspaces
- High speed internet
- Maintenance regime for infrastructure
- Intelligent penetration into backlands and landlocked, unused gardens to allow for more development in the centre
- Sensitive creation of more 'porous' western and southern boundary to link old and new town areas
- Fewer private cars
- Pedestrianisation and reduction of speeds to 10mph
- Fewer convenience stores and better controls on the night time and takeaway economy
- Replace most short journeys by car with walking, or cycling
- Cycling to town centre is universally perceived as unsafe with too many cars and delivery vehicles usurping the public space
- Delivery vehicles perhaps should have higher priority
- Residents parking scheme required
- Continued investment in the public realm rather than wasting money on marking streets, excessive lighting schemes, pointless signage and excessive road schemes e.g. traffic calming
- High street is in need of regeneration, there are many opportunities to improve the facilities, shops and to make both more family friendly and inviting
- Utilise vacant buildings and sites for specialist housing and work needs

Port Seton town centre

- Use harbour for retail and restaurants
- Would benefit from major investment in recreational and environmental strategies

Longniddry town centre

- Village centre needs improved parking near shops

Gullane town centre

- Town centre would benefit from more parking and less through traffic

KEY MESSAGES

- **Of the key agencies Scottish Government requires the Proposed Plan to promote the town centre first principle and suggests that a town centre health checks and strategies be prepared. Supports a new town centre at Blindwells. SNH emphasises connectivity to and from Blindwells and the importance of green infrastructure East Lothian elements in existing town centres as does East Lothian Council Landscape and Countryside.**
- **Landowners, developers and agents mostly support a new town centre at Blindwells though Haddington is also suggested for retail investment and it is suggested that more land for retail outside Haddington town centre should be planned for. ASDA at Dunbar seeks protected status within retail policy.**
- **Prestonpans, Cockenzie/Port Seton, Gullane, Duns, North Berwick, Humbleton/Bolton/Saltoun and Ormiston Community Councils all support a new town centre at Blindwells to serve the new town. Of these North Berwick and Gullane think it should expand in time to serve a wider area. Views of other local interest groups vary, though most support Blindwells meeting its own town centre needs. Some think that Blindwells is too close to shopping centres on the edge of Edinburgh to prove viable. HADAS suggest an alternative sub regional centre at Dunbar.**
- **Most members of the public support a new town centre at Blindwells and the maintenance of the current network of town centres, but more members of the public think Blindwells should also cater for a wider area.**
- **Each existing town centre received strong support with a wide range of comments on what should be done to improve them. Common issues were traffic and parking, improving buildings and spaces, and lack of facilities.**

Issue: Planning for Employment	MIR Question: Question 5
Total number of responses on issue	134
Support for preferred approach	77
Support for alternative approach	16
Support for neither approach	22
<p>Scottish Government, key agencies, and adjoining authorities</p> <p><u>Scottish Government</u> – the preferred approach, promoting mixed use strategic and local employment sites where appropriate, seems consistent with SPP, which indicates that plans should reallocate business sites which are underused to enable a wider range of viable business or alternative uses, taking careful account of the potential impacts on existing businesses on such sites. Where sites have formed part of the supply of employment land and are not being taken up, it may well be appropriate in some cases to consider whether alternative mix of uses would be more suitable use of the land and achieve the aims of the development plan. In relation to office use the town centres first approach is expected to be included in the Proposed Plan. Scottish Planning Policy broadens out the town centres first approach to uses which attract significant numbers of people including offices.</p> <p><u>Scottish Environmental Protection Agency</u> - no preference in relation to the review of the employment land supply though the review should include an assessment of impacts on the environment and consideration of the options continued through strategic environmental assessment. Whichever option is followed it should include the commitment in the 'Preferred Approach' that: "in all circumstances the location for the proposed employment uses, and/or mix of employment uses and other use, must be appropriate and be able to co-exist satisfactorily and with those others uses proposed and/or that exist in the area".</p> <p><u>East Lothian Council Landscape and Countryside</u> – supports preferred approach.</p>	
<p>National interest groups</p> <p><u>Architectural Heritage Society of Scotland</u> – supports preferred approach. Notes that flexibility in use of employment land is important for optimum results.</p>	
<p>Landowners, developers and agents</p> <p><u>Scott Hobbs Planning for Queen Margaret University</u> – supports the preferred approach. Proposed Plan should make explicit reference to the East Lothian Council Economic Development Strategy and Action Plan 2012-20122. The business land allocation adjacent to the University continues to offer the potential for part of the land to accommodate an Incubation Park adjacent to the University campus, intended to accommodate the small and medium enterprise (SME) start-ups developed through University incubation. Supports the release of land from the Green Belt south of the A1 to accommodate mixed use development, where that development can contribute to the delivery of essential infrastructure and can contribute to the success of the Business and Education-led Hub, centred on the University. Is concerned that the release includes an extensive allocation of additional employment land focused solely on this use, and that this would replicate the allocation north-west of Queen Margaret Drive which the University considers to be pivotal to the success of the Business and Education-led Mixed Use Hub as set out in its Development Strategy. The Proposed Plan approach should focus on maximising the potential to secure the delivery of employment on</p>	

strategic employment sites. Recommends that, in the context of land at Craighall, the most realistic potential to see this strategic employment opportunity delivered is through the reconsideration of uses to the east of QMU for alternative uses and ensuring that any release of Green Belt land south of the A1 does not provide the potential to compete against the Business and Education-led Hub proposal as set out in the QMU Development Strategy.

Landowner at Dirleton - Employment, wherever located, should be a priority and the Council should not be shackled with prescriptive policies which delay and fetter its ability to act in promoting employment opportunities where they are identified or to react where development proposals are brought before it which promote employment.

Rick Finc Associates - supports the preferred approach. However the strategic employment site at Blindwells is considered undeliverable and ineffective for the foreseeable future. The Council should re-align housing and employment markets as far as is possible within the Haddington area. Suggests a phased release of site OTH-H8 (West Letham) for employment use.

Rick Finc Associates for MJ and V Rennie Trust for land at West Barns – supports reasonable alternative. Suggests that Dunbar is well located for strategic allocations including mixed residential, employment and ancillary uses/services at West Barns.

Rick Finc Associates for Hallam Land for land at Dolphinstone – supports preferred approach. Support retention of 76ha employment land. Agrees with the approach to review employment land to ensure land is marketable and supports employment uses. Alternative uses should be assessed on non strategic employment sites and may include housing and associated uses.

Scottish Power Regeneration – supports preferred approach. The site at Cockenzie identified as PREF-P1 is not identified as a strategic employment sites within the SDP, although is obviously a key site given its recognition within NPF3. Supports in principle the details contained at paragraph 6.32 where NPF3 and the existing S36 consent are recognised and supported. The site at Cockenzie comprises the former power station and the associated coal handling plant and coal store. The coal store area presents opportunities for mixed use development given its relationship to the existing pattern of use. This offers a flexible approach to the future redevelopment of the site, and this can be agreed through a master planning exercise.

Scott Hobbs Planning Ltd for In-Site Property Solutions Ltd. – supports the preferred approach in terms of the promotion of mixed use strategic and local employment sites but considers that the existing quantity of employment land need not necessarily be retained as part of the employment land supply. Considers it is the quality and location of employment land and the flexible interpretation of what constitutes employment land which is crucial to expanding the job density of East Lothian, rather than simply the amount of land. Supports the intention to review the total employment land supply and considers that the uses considered appropriate on existing allocated land should be expanded in circumstances, such as Gateside East, where this would generate a higher job density than if retained as employment land alone.

Geddes Consulting for Hamilton & Kinneil Estates; Wallace Land and The Sir John Hope Executry; Wallace Land and Gladys Dale's Drylawhill Trust; Wallace Land; Hallam Land Management; Sirius Sport & Leisure – supports the preferred approach which is likely to result in some sites that are currently allocated for business use in the Local Plan being allocated for alternative uses in the LDP. Notes that to be effective economic land requires to be serviced and the promotion of mixed use development is one way to secure serviced economic land.

Geddes Consulting for Lothian Park - supports preferred approach; their site at Old Craighall (OREF-M2) is effective and is supported.

Geddes Consulting for TG Tait & Sons land at Tantallon Road North Berwick - supports the preferred approach which is likely to result in some sites that are currently allocated for business use in the Local Plan being allocated for alternative uses in the LDP. Notes that to be effective economic land requires to be serviced and the promotion of mixed use development is one way to secure serviced economic land. Supports the allocation of land at Tantallon Road North Berwick for mixed housing and employment uses.

Turley on behalf of Hargreaves UK Services Ltd and Mr R Kennedy, land at Blindwells – supports the preferred approach. Suggests a flexible policy framework for sites allocated for employment uses in the event that there is no market for employment uses and other uses would be more appropriate.

Ryden for Wemyss & March Estate – supports preferred approach to introduce a more flexible and responsive approach to employment land but requests that support for the rural economy is stated within this policy as well.

Wemyss & March Estates – supports the preferred approach but wants employment opportunities to be considered in rural areas as well. Claims East Lothian says it is open for business but current planning policy carries a more negative message. MIR contains little policy detail to support or encourage the expansion of rural communities and businesses. Employment policies should contain a reasonable balance of opportunity between new larger scale mixed use development and small scale rural local business opportunity. Every effort should be made to provide opportunity for local residents to work in East Lothian and reduce our reliance of the Edinburgh employment market.

APT Planning & Development Ltd. for Cruden Homes (East) Ltd., land at Amisfield Haddington – supports the preferred approach; promoting mixed-use strategic and local employment sites and new sites to encourage residents to live and work in East Lothian. Large residential sites such as Amisfield can provide a limited amount of employment uses.

APT Planning & Development on behalf of Cala Management Ltd. for land at Drem – supports the preferred approach promoting mixed-use strategic and local employment sites and new sites to encourage residents to live and work in East Lothian.

Colliers on behalf of Taylor Wimpey and Mactaggart and Mickel – supports the preferred approach including its strategic and local employment focus. But suggests that it is necessary for the strategy for employment land to have a strong link to the wider strategy for growth and housing across the Plan area and suggests that the compact growth strategy which steers housing development away from settlements such as Haddington that is located in the wider economic corridor would detract and weaken the objective of economic growth across the strategic development area.

Persimmon Homes – supports neither approach. SESplan indicates that East Lothian should maintain 76 hectares of employment land throughout the region; unnecessary to allocate a total of 225 hectares for employment uses within East Lothian. Limited growth in employment across the region is due to a lack of demand rather than choice, given there are already a number of allocated sites within the 2008 local plan which have not delivered. Employment allocations should be significantly reduced rather than allocating additional, unnecessary land. Persimmon contends that the employment allocation at Craighall should be reduced from the 79 hectares to approximately 30 hectares.

GL Hearn for Cooperative Group – supports neither approach. Notes the SESplan requirements to maintain 76 ha of employment land and questions whether additional non-strategic employment land is required. Wishes to see its land to the east of Tranent considered for housing or mixed housing and employment uses.

Cardross Asset Management – supports neither option. There should be careful consideration of all potential uses of major opportunity sites; just because a site at present has an employment use / designation should not preclude consideration of alternative uses.

Ironside Farrar Ltd. for owner of Old Yester School Gifford – supports neither approach. Seeks to change the business use policy on the old Yester School at Gifford to allow for a residential use.

PPCA Ltd. for Wallace Land Investments for land at Fenton Barns - supports neither option. Wallace Land supports the wholesale review of the employment land supply in East Lothian. This should apply equally to both strategic and non-strategic land allocations with a realistic approach adopted that sieves out land with no demonstrable prospect of delivery being deleted from the supply. Proposes land at Fenton Barns for mixed use and considers it a suitable alternative to land at Blindwells.

Montagu-Evans for D Craik, land at Old Saleground East Linton – supports neither approach. The review should assess whether employment proposals should remain allocated for employment use either in whole or part, or in the case of non-strategic employment proposals (such as the Mart site in East Linton) not at all.

George F White LLP on behalf of Mr. M Steven for land at MacMerry; and D Locke – supports neither approach. Strongly agrees with the existing allocations under the Local Plan (2008) and suggests that Macmerry should be retained as a strategic area for employment provision. Supports 15 hectares of land for general industry/ business to be promoted east of Macmerry Industrial Estate (site PREF-T9). Seeks clarification on a clear strategy of how employment land could be promoted, including mixed-use development on some sites.

Francis Ogilvy, Chalmers and Council. – supports neither approach. Considers the preferred approach to be unclear. Notes that East Lothian has a low number of jobs. Claims that East Lothian Council does not encourage inward investment and expansion of existing businesses. Suggests piloting different approaches towards the expansion of employment provision by facilitating business start-ups and breaking down barriers to business development e.g. expansion of fast broadband which would encourage more working from rural locations.

Whitehill Lodges – supports reasonable alternative approach. Chalet and caravan parks are bring economic benefits and jobs to local areas but the local development plan gives no significance to this unless these are considered as mixed use sites. Should not simply focus on strategic sites.

Community Councils and local interest groups

Prestonpans Community Council – supports preferred approach but notes that East Lothian has unused or underused employment assets that should first be brought into use before allocating new land (especially greenfield/green belt land) for employment. The Proposed Plan should acknowledge the reality that the majority of employment opportunities come from Edinburgh and the M8 corridor, not East Lothian.

Humbie, East and West Saltoun and Bolton Community Council – supports the preferred approach.

In rural areas, there needs to be greater flexibility to change designations between housing and employment land to ensure that small businesses are encouraged. Small businesses in rural areas typically have low and variable incomes and require small and flexible business space. High speed broadband should be a pre-requisite of designating any employment site.

North Berwick Community Council - supports the preferred approach. Essential to maintain flexibility balancing the loss of any commercial land with the need to provide employment. There is also a need for small affordable business / employment units to be built.

Gullane Area Community Council – supports the reasonable alternative. Support land for employment and commercial uses at Tantallon Road, North Berwick provided site access can be resolved. The Fire Services College in Gullane should be used for education purposes, failing which mixed use including light industrial / office use for small businesses and tourism uses.

Cockenzie and Port Seton Community Council – supports the reasonable alternative. Strategic employment sites should be retained and non-strategic areas open to mixed use. A business niche needs to be identified for East Lothian to specialise in and should be promoted.

East Lammermuir Community Council – supports neither approach. More emphasis should be given to supporting infrastructure for employers and businesses in rural settings e.g. high speed broadband to encourage home working and provision of flexible office and workshop space in community facilities in villages and surrounding countryside. Shifting more employment nearer to the villages will reduce reliance on transport, energy consumption and increase sustainability of fragile communities.

Dunbar Community Council – supports neither approach. Local employment is very important to a growing town. Disappointed that the Spott Road strategic employment site has not been developed. The community view is that there is good demand for smaller scale workshops and high tech offices with sole practitioners/small business owners electing to set up workspaces close to where they live; that priority should be given by ELC to models that would support the release of at least part of the Spott Road site as serviced modules. The Spott Road site SHOULD NOT be re-allocated for housing particularly not on the grounds of ‘no demand’ for employment use. There should be a safe attractive link between Spott Road and the Newtonlees site Pref D5/D6. In Dunbar town centre small scale, contemporary office modules could be accommodated in the backlands.

Dunpender Community Council – supports neither approach. Support sites for employment in East Linton at Phantassie and the Auction Mart. The Industrial Site at Station Road could be better developed. Car parking would need to be allocated at all sites, as this is becoming more of a problem. Jobs should also not be seen as requiring lots of land space in specific areas. More and more people are working from home. Support in terms of enhanced broadband facilities would help this.

Garvald and Morham Community Council – supports neither approach. Better broadband connection and access to mobile networks would greatly benefit everyone in our area but particularly local businesses, people working from home and students.

North Berwick Coastal Area Partnership – supports mixed use including employment at the Fire Training School site in Gullane

Fa’side Area Partnership – existing allocation of employment land on the Cockenzie Power Station site should be retained as it is vital to provide more jobs in the area.

Preston Seton Gosford Area Partnership - not against the allocation of Cockenzie Power Station for employment use, but only the industrial land as it sits now should be allocated for employment; it should not extend beyond these current boundaries. The type of employment to be provided must be diverse, varied and sustainable with careful consideration of specific industry trends and needs. Is concerned over the environmental implications of the proposed extended pier.

Musselburgh Parish Grouping of the Church of Scotland – supports preferred option. Notes importance that what is developed at employment sites caters for the needs of employers. There are unused units already at Fisherrow and Newhailes Industrial Estates. Creating more unused units benefits nobody!

Association of East Lothian Day Centres – supports the preferred approach.

Dirleton Village Association – supports the preferred approach. Note there is little scope for increasing the amount of employment in Dirleton and no suggested sites in Main Issues Report.
Musselburgh Conservation Society – suggests small employment allocations be made within strategic housing developments.

East Lothian Agricultural Discussion Society – Need more promotion of local employment and business in order to stimulate community cohesion around smaller settlements.

Sustaining Dunbar; Scottish Green Party in East Lothian - The development of a resilient, post-carbon, local economy will open up numerous new opportunities for local livelihoods. There will be an increasing need for flexible and affordable workspace and office accommodation, such as is proposed for East Linton Auction Mart, which is already oversubscribed with prospective tenants. The LDP must encourage such small scale mixed developments and require commercial developers to provide serviced employment land as part of housing developments.

Fisherrow Waterfront Group; Eskmuthe Rowing – supports neither approach. Suggest a more creative approach recognising that coastal communities have a lot of potential for employment generation but need the support of the Council – both financial and in other ways – to make the most of their assets.

Haddington & District Amenity Society – HADAS does not support either approach but suggests a mix of both approaches be considered. Some employment land could be sacrificed, and may be suitable for mixed use and retail, while other areas should be retained or reviewed or relocated in the area or town. Haddington needs more effective employment land that allows businesses to grow. The setting and design of employment land should be considered early in the process (as part of a developer contributions policy requirement); different types of employment land are required so that the character and amenity of the towns is protected and Blindwells should be considered for employment use, in particular for agriculture.

Aberlady Conservation and History Society – supports reasonable alternative. Any housing plans that increase local populations should also consider provision of local employment opportunities.

Common Weal Dunbar – supports preferred approach. The LDP should encourage small scale mixed developments and require commercial developers to provide serviced employment land as part of housing developments. Flexible and affordable workspace and office accommodation is at a premium in the region already e.g. the proposed East Linton Auction Mart is already oversubscribed with prospective tenants.

Bolton Steading Residents Association - supports preferred approach and endorse the comments made by the Humber, East & West Saltoun and Bolton Community Council.

Coastal Regeneration Alliance (on behalf of 102 people) - It is unclear as to whether the proposed strategies for the County identify a need for the introduction of such a large (80Ha plus quayside) new site at Cockenzie. The MIR does however appear to suggest that East Lothian has adequate sites identified within the existing Local Plan and the suggested increase at Cockenzie therefore appears to be unnecessary.

Members of the public

Support the Preferred Approach (47):

- Seems a more realistic approach given what the demand appears to be
- If sites are reviewed please do not permit retail uses on employment sites
- Mixed use is more sustainable
- Dunbar needs more local employment to reduce commuting
- Employment land should be close to labour supply and accessible by road and public transport
- Need to maintain land already designated for employment
- Public investment may be required to service plots on employment land
- Local employment cuts down on travel and keeps spend local
- The council should focus on how to attract/retain good quality businesses or how to encourage new businesses to start up, only then can a decision be made as to whether mixed use or sole employment use is appropriate
- Flexible approach should be adopted to allow housing and small industrial units to be built close together
- Better broadband and cheap office space would encourage locally based employment
- Great approach to encouraging more business in East Lothian
- Many sites have been unused for too long (sometimes causing amenity issues to surrounding areas) to justify continued allocation for employment
- Encourage more employment locations for small businesses and start ups to share and expand e.g. the 'Why Not' model in North Berwick
- Should also review predicted future employment trends and decentralise some services that require transport to Edinburgh
- If there is enough employment land already no need for an increase around Cockenzie power station site
- Employment sites are required but should not be on green belt land
- Should also support small digital businesses that can be located in coastal or rural areas without detrimental development impact
- Craighall is a good location and offers easy traffic management

Support Reasonable Alternative (10):

- No support for additional employment land for heavy industrial development at Cockenzie; though the existing power station site should be reused and infrastructure required for offshore wind is acceptable
- The preferred approach would allow employment sites to go for housing use which is undesirable
- There is land to develop business opportunities in the east as well as the west

Support Neither Approach (9):

- Both approaches fail to recognise the benefits of tourism (including golf) and the need to encourage visitors; these approaches would negate the visitor experience to East Lothian and decrease numbers.
- Too much emphasis on industry and lack of foresight on tourism
- Employment/business parks should be entirely separate from residential areas unless they directly serve them; they should not be allocated to areas of green space that separate existing communities
- More consideration should be given to different types of employment land so that the character and amenity of the towns is protected.
- Focus on job density is mistaken; East Lothian is intentionally part of the Edinburgh housing market area therefore has a higher proportion of residents working in Edinburgh which is where their skills are most likely to be required.
- Developing an employment centre further to the east of East Lothian might help to ensure local required services are provided in East Lothian

KEY MESSAGES

- **Of the key agencies, Scottish Government has indicated that the preferred approach seems consistent with Scottish Planning Policy which indicates that plans should reallocate business sites which are underused or not taken up to enable a wider range of viable business or alternative proposals. SEPA has indicated that the review of employment land supply and consideration of its options should continue to be made through strategic environmental assessment and locations selected that co-exist satisfactorily with other existing or proposed uses in the area.**
- **East Lothian Council Landscape and Countryside support the preferred approach.**
- **Landowners, developers and agents mostly (16) support the preferred approach to propose mixed use strategic and local employment sites where appropriate, maintain the quantity of the current employment land supply and review the contribution that existing proposals make to this supply. Of those who supported neither approach (9) the main reason is that non strategic employment sites are not required due to lack of demand and that those sites where there is no prospect of delivery should be deleted from the supply;**
- **The Community Councils had a mixed view with Prestonpans, Humbie/Saltoun/Bolton and North Berwick supporting the preferred approach; Gullane and Cockenzie the reasonable alternative and East Lammermuir, Dunbar, Dunpender and Garvald/Morham supporting neither approach. Alternatives suggested included more emphasis on infrastructure such as broadband to encourage more employment particularly in rural areas. Community Councils generally favour local employment including for smaller settlements rather than concentrating solely on strategic employment sites. Some indicated that there was local demand particularly for small business units but that allocated land that was unserved could not meet this; different models of delivery might help. Other local interest groups suggested that mixed use might have a place on some sites; employment sites needed better promotion and that in future there will be an increasing need for flexible affordable work space; developers should be encouraged to provide small serviced employment land as part of housing developments;**
- **Of the members of the public, most support the preferred approach which was commonly recognised as a practical approach. There was considerable opposition to the preferred allocation of an additional large site new site between Cockenzie and Prestonpans for employment. Some were concerned that employment sites should not be allowed to change to housing and that retail use should not be permitted.**

Issue:	MIR question:
Planning for Housing: Should the LDP plan for a longer term settlement strategy?	Question 6
Total number of responses on issue	150
Support for preferred approach	82
Support for alternative approach	41
Support for neither approach	13
Scottish Government, key agencies, and adjoining authorities	
<p><u>Scottish Government</u>: welcome the focus on delivery and early discussion of education capacity, balance between large and smaller -scale sites, and setting out of infrastructure issues and mitigation measures. It is good to see early consideration of effectiveness of sites ahead of their inclusion in the Proposed Plan (para 5.44). It would be helpful to use the SPP terminology in relation housing with respects to HNDA and HONDA. It is good to see the initial supply figures (p124) and that individual settlements are clearly set out. The tables and graphics are clear and set out preferred, alternative and already committed sites well. SPP states that as part of the HNDA, local authorities are required to consider the need for specialist provision. It is not clear from the information presented in the MIR whether East Lothian has considered this and it should be addressed by the LDP. Para 133 of SPP notes that development plans and local housing strategies should address any need for sites for Gypsies/Travellers and travelling Showpeople. There is reference on p221 to the intention to include a policy on Gypsy/Travellers in the Proposed Plan and p124 of the Monitoring Statement indicates that this will be a criteria-based policy. While content that this issue is to be addressed in the LDP, there is no mention of the findings of the HNDA on the issue. There is no information presented to indicate whether there is any need for houses in multiple occupation, any particular housing requirement for service personnel or from people seeking self-build plots. For the avoidance of any doubt, it would be helpful if the LDP or supporting information set out briefly, any findings from the HNDA any subsequent research. Town centre living is one of the strands of the Town Centre Action Plan and we will expect the Proposed Plan to support this theme, both in policy terms and when looking at allocations / opportunities.</p> <p><u>Scottish Environment Protection Agency (SEPA)</u>: In general, we would prefer the 'Preferred Approach'. A longer term strategy could, for instance, help identify the longer term needs for water infrastructure and identify the phasing necessary to deliver it. A longer term strategy could also identify the longer term prospects for flood risk and identify where development should be avoided in the short to long term.</p> <p><u>Midlothian Council</u>: Midlothian Council consider that as well as meeting the SDP requirements up to 2024, it is reasonable to indicate longer term requirements as well – given take up rates at large sites (which may extend beyond SDP timescales) and the need to plan for appropriate infrastructure.</p>	
National interest groups	
<p><u>Homes for Scotland</u>: Homes for Scotland supports the preferred approach to planning for housing. There is much to be commended in the approach being taken, in particular the recognition of the two distinct housing requirements set out in the SDP; the willingness to exceed those requirement periods in the interest of clear longer-term planning; the clear focus on identifying land which will deliver homes during the plan period; and openness to identifying sites of a range of sizes and types (including greenfield land). This approach gives the Council and the home-building industry the best opportunity to maximise delivery during the LDP period and beyond. Planning for a longer term</p>	

settlement strategy would, as the MIR acknowledges, provide a stronger context for infrastructure planning. The only cautionary points Homes for Scotland would make at this stage are: (1) We consider there to be more scope for reviewing existing allocations than the MIR recognises. The Council seem to have interpreted the SDP as requiring all local plan allocations to be maintained. Consequently there is no reference in the Main Issues Report to the potential de-allocation of sites. This could undermine the Council's determined approach to ensuring housing is delivered across all sites. (2) Paragraph 5.39 alludes to the need to allocate sufficient land to make it possible for East Lothian's housing requirement to be met in full, even if the housing market is not able to sustain the necessary build rates. The Council is to be commended in not using any concerns with the market to under-allocate to take a do-minimum position. The Council will want, though, to ensure its concerns do not deter it from allocating a range of sites that the market can genuinely deliver (i.e. there should be no unrealistic – including unmarketable sites – included just to make up the numbers.

RSPB: The longer term option should be adopted. Housing developments can, with the necessary imagination and forethought, provide useful habitat for wildlife. This can be achieved through the planting of native species of trees, shrubs and wildflowers in common areas, the creation of water features, provision of swift nestboxes and a lighter touch when it comes to landscape management of developed areas. A level of public engagement may be required to ensure that the environmentally-friendly approach is not misconstrued as neglect or cost cutting. Reference should also be made to the best practice guidance on Sustainable Urban Drainage Systems and Wildlife: http://www.rspb.org.uk/Images/SuDS_report_final_tcm9-338064.pdf

Landowners, developers and agents

Developer / agent / landowner (no organisation given): The focus should be on making provision for the required housing now i.e. in the short term. The need is urgent and the provision should be addressed in an appropriate manner rather than officials being distracted by making grand plans for long-term development which may or may not be required and relying on plans for future housing which may or may not be capable of being made effective. The situation in 2024 may be very different from now.

Strutt & Parker obo landowner south and west of Drem rail halt: We support the preferred approach for planning for a longer term housing strategy. The SDP contains housing requirements to 2024 with a, as yet undistributed, requirement for 2024 – 2032 which will be clarified through a review of SESplan which is about to commence. Given the lead in times necessary to assess and resolve constraints, particularly with very large scale developments, we believe that it is appropriate to begin considering this now to enable the necessary investigations to be undertaken. Identifying and safeguarding these opportunities in the LDP provides the landowners involved the comfort and certainty to make this investment and progress investigations necessary to bring forward development. As part of this approach we acknowledge and support the identification of Drem as a potential location to meet this longer term requirement

Montagu Evans LLP (land to the east of Athelstaneford Ref: PM/NK/HSG033): Our client agrees with the preferred approach to allow for new alternative sites to be identified which can help meet the housing requirements to 2019 and in the period 2019-2024, that help maintain an effective five year housing land supply even if their development would extend beyond 2024. It is considered that there may be a number of sites that are identified for development that are not effective sites and may not come forward during the plan period. The site (H8) at Athelstaneford is an allocated site in the 2008 East Lothian Local Plan but there is no planning permission for development on this site and it has not come forward for development, however it is still recognised as part of the established housing land supply. The preference for housing land release should be within the SDA.

Montagu Evans Whitecraig South (pref M4): Our client agrees with the Main Issues Report's preferred approach to allow for new alternative sites to be identified which can help meet the housing requirements to 2019 and in the period 2019-2024, that help maintain an effective five year housing land supply even if their development would extend beyond 2024. The development of the site at Whitecraig South (pref M4) will help to deliver this objective and can be developed within the plan period.

Co-operative Group c/o GL Hearn: We support the principle of the LDP seeking to meet the SDP's housing requirements for 6250 homes to 2019 and a further 3800 homes 2019-2024. We then also support the implied preference to 'intensify existing allocations' and in line with this we urge the Council to re-allocate the Co-operative Group land at east Tranent (LP ref BUS11) to all or part Housing. Identifying additional housing land here will support the SDP requirement for a generous supply of housing land within the SDA, and all on a site that the Council has already accepted is appropriate for development and that can be accessed. All of these matters point to its suitability for development, and we are firmly of the opinion that for these reasons it must be preferred for housing development, either instead of or alongside other Council preferred sites, as identified in the MIR. The site is considered to meet the SPP tests of effectiveness and has been subject of recent housebuilder interest by way of offers being made.

Rick Finc Associates obo landowners of site 4FD (Letham Smallholdings): from the draft Housing Land Audit 2014 (HLA) the development programme expected by the Council is too optimistic. The HLA report suggests that East Lothian Council, realistically, needs to allocate a further 2,249 effective housing units for the period up to 2019 to comply with its housing land supply obligations. For the period 2019 to 2024 the draft HLA 2014 suggests an additional 2,544 units will be required to maintain an effective supply. Our client does not agree that the current strategy for housing should rely so heavily on the promotion of a new settlement at Blindwells (or its extension). The deliverability of this site is severely restricted. Blindwells (neither the committed or extension area) does not pass the 'effective' test. Indeed, the HLA indicates that it feels the Blindwells development will have no completions before 2024. Our client agrees with East Lothian Council that there is an urgent need to identify other greenfield and brownfield land for housing elsewhere in East Lothian in order to possess an effective five year housing land supply. Our client also agrees that due to the need to maintain a five year effective housing land supply East Lothian Council may need to extend its allocations to outwith the SDA. A main strategy for the LDP is to 'disperse' housing and economic development across the SDA. However, this representation seeks to offer an effective housing site, within the SDA, thus reducing the allocations needed outwith the SDA. Furthermore, as well as being located within the SDA, and being contiguous with an already identified housing site (H2), its allocation will assist in the contribution towards, and delivery of, key infrastructure for the entire Letham Mains expansion area. Overall, our client agrees with the Preferred Approach (and for many of the same reasons the Reasonable Alternative) which would see East Lothian Council committing many more sites for housing to ensure it has an effective five year land supply. To plan for a longer term housing strategy as suggested in the Preferred Approach is also sensible, but without the heavy reliance on the currently ineffective Blindwells site.

Rick Finc Associates obo The MJ and V Rennie Trust (the Trust) (Sherriff Fields, West Barns): The Trust is of the opinion that East Lothian Council is not complying with Scottish Planning Policy nor reflecting the outcomes of the SESplan Supplementary Planning Guidance in making provision for a generous amount of land for house building. We do not believe the Council is meeting the requirement of a five year supply of effective land at all times. Based on the HNDA, Policy 5 of the SDP requires land to be made available for a total of 10,050 units in the period 2024. A possible requirement of an additional 3,820 dwellings is identified for the period up to 2034. Allocation of

Sherriff Fields would not undermine the delivery of existing allocations. The figures presented in Paragraphs 5.37- 5.40 of the MIR are based on the 2013 HLA and suggest that a further 2,000 units will be required up to 2019, with a further 1,650 up to 2024 in addition to existing sites. In the light of new figures based on the Draft 2014 HLA these figures appear to be a significant underestimation for programming and infrastructure reasons. In terms of the spatial strategy the Trust wishes to see adequate provision made for housing and employment land to the east of the district. The allocation at Sherriff Fields would allow SDP Policies 1A/ 1B as well as Policies 5-7 to be implemented. It would contribute to the five year land supply without undermining or prejudicing other policies in the Plan. It would complement other allocations and enhance the delivery of associated infrastructure. It is anticipated that 3,820 houses may be required during 2024-32 in East Lothian. Whilst it may be possible to identify allocations that run into this period and logical expansions that are signposted for further feasibility or search, it is difficult to see how this issue can be addressed prior to resolving the deficits in the short and medium term. As suggested in paragraphs 5.50 and 5.51 of the MIR there are numerous uncertainties involved in such an approach and the Trust is of the opinion that this should be set aside for a LDP review. In our view the priorities identified within the Preferred Approach would equally be applicable to the Reasonable Alternative. On the basis of this we would support the Council's Reasonable Alternative.

Rick Finc Associates obo Hallam Land Management Ltd (Dolphingstone Farm): Hallam considers that there is a shortfall in provision and that East Lothian Council is not complying with Scottish Planning Policy, nor reflecting the outcomes of the SESplan Supplementary Planning Guidance. A total of 10,050 dwellings require to be delivered in the period up to 2024 with further land to accommodate 3,820 dwellings in the period 2024-32. Additional releases for 3,650 units need to be identified in addition to existing sites. Recent information from the 2014 draft HLA and Homes for Scotland suggest that this is likely to be accurate, subject to programming. It is now estimated that there is a shortfall of 2,250 up to 2019 alone with a further 520 units required up to 2024. Not all of the established housing land supply can be developed in the Plan period. The margin of flexibility assumed in the Council's figures (12%) is too low as over 10,050 houses will be needed as part of a generous land supply. Greenfield sites such as Dolphingstone Farm to the west of the district will be needed and it will not undermine existing sites. The approach taken to focus on the west of the Strategic Development Area is broadly supported and Prestonpans is optimally positioned. The MIR preferred supply is over reliant on large infrastructure heavy sites, such as Blindwells, which monopolise infrastructure capacity and funding. The supply to 2024 will be reliant on intensification, identifying new land and safeguarding existing commitments (not all of which will be deliverable). The role that Blindwells will be fairly pivotal. Up to 2024 no output is anticipated from the land during this period and the Council cannot rely on delivery in the medium term without allocating compensatory provision on other greenfield sites. It is anticipated that 3,820 houses may be required during 2024-32 but deficits in the short and medium term need to be addressed. In terms of long term land supply, this should be set aside for a LDP review. The priority within the LDP must be to plan to meet known housing requirements as described within the Reasonable Alternative and this is supported by Hallam.

McCarthy and Stone c/o Planning Bureau Ltd: Whilst the crucial role of appropriate housing and the widest range of options for older people is widely recognised problems in achieving an appropriate supply that reflects the current tenure preferences of older people remain. There is a strong focus on those in need of social rented housing and a recognition of the need to provide access to new intermediate models that mix renting and ownership and there is also an awareness of the very high levels of home ownership among older people. The profile in relation to the age of its population East Lothian sits above the national average, those sixty-five years of age and over will continue to increase both in absolute terms and as a proportion of the total population. Those in the oldest cohorts will increase significantly through the period with an impact on demand for both specialised

accommodation and care services. This may contribute to additional demand for specialised accommodation but will have a direct impact on demand for care home places. A heavy dependence on beds registered for nursing care and continued expansion of that provision to meet the requirements of an ageing population is likely to be financially unsustainable. The provision of retirement housing for owner occupiers is far short of requirements to achieve equity of options between tenures. There is scope to provide up to seven hundred and fifty additional dwellings in retirement housing for older home owners. The most pressing priority is to increase the availability of specialised accommodation for older homeowners. HNDAs provide a fundamental part of the evidence base to set housing supply targets and inform land allocation decisions being made within the development planning process. The development proposed for Tantallon Road/Heugh Road, North Berwick makes a modest but significant contribution to meeting that priority.

Gladman Developments Ltd (submitted in association with Lempockwells Road (PREF-T14 in Pencaitland) and as a general submission): Gladman support the preferred approach to allocate land post 2024 as a proactive long term plan for housing. Gladman support East Lothian Council's intention to recognise and allocate land to achieve the housing land requirement over the two distinct periods and identify a range of sites by size and type. However, the phasing of sites over any period should not be restrictive. Should a housing land shortfall exist then sites allocated beyond 2024, which can be demonstrated to be effective, could be brought forward. This adds further flexibility to the housing land supply and aids in ensuring housing completions. East Lothian should review the amount of land required to be allocated at the Proposed LDP stage by using the most up to date Housing Land Audit, i.e. the 2014 audit, to give the best reflection of expected completions and a true reflection of the land required to be allocated. This review may also mean considering the de-allocation of sites which are not likely to produce completions in the lifetime of the plan.

In-Site Property Solutions Ltd c/o Scott Hobbs Planning Ltd (Gateside East, Haddington): In-Site considers that the LDP should ensure that the full range of housing types is provided to meet the needs of the ELC population from 'cradle to grave'. Population and household projections expect that 'the pensionable age population is expected to increase by 43%, and the number of people aged over 75 is expected to increase by 95%..... by 2035 there will be a 70% increase in single person households in East Lothian, with 33% of households being single person'. The MIR recognises that this demographic change will increase demand for 'infrastructure, facilities and services in East Lothian, such as education, road, rail and transport links, including public transport, and health care, etc.' In-Site considers that different forms of residential accommodation to meet the needs of this changing population needs to be planned for in the LDP. It considers that this can be achieved through expanding the uses appropriate on housing and mixed use sites. Gateside East is one appropriate site for such use.

Ashfield Land c/o Scott Hobbs Planning Limited: Ashfield Land supports the preferred approach to the longer term settlement strategy to meet the SDP housing requirements by signposting need and demand for housing post 2024. The SESplan HoNDA signposts, in the period 2024-2032, that there may be a need and demand for a further 3,820 dwellings in East Lothian and the SDP suggests that the LDP may be able to identify opportunities for growth beyond 2024. This is all the more important given that SESplan2 is emerging, and is likely to have implications for East Lothian in terms of accommodating further housing numbers. The signposted need and demand for housing post 2024 has the benefit of providing greater certainty about where developers can and cannot expect development to be focused, providing a level of certainty for forward planning of projects in terms of arranging/ securing finance to assist in their ultimate delivery. The focus longer term should continue to be on the compact strategy approach including all the allocations included in the preferred option for housing in the MIR and adopting the longer term Blindwells expansion approach as included in the MIR. Taking a relatively short term view to 2024 would suggest that the

compact strategy is subject to review in subsequent LDPs and this would weaken the focus on this approach and weaken the effectiveness of the strategy overall. The 2008 Local Plan which focused on a dispersed strategy has not been successful. It is important that the compact strategy is adopted for the long term. Table 8 summarises the position as it relates to housing need, but does not do so successfully. In particular, the bullet points within the preferred approach purport to guide the selection of new sites to meet the SDP's housing requirement to 2019 and in the 2019-2024 period. The bullet points, however, ignore the commitment made in Table 5 to the compact approach being preferred to the dispersed approach and this should be clarified as the first bullet point in Table 8. In particular the second bullet, which refers to the identification of appropriate new land in, or as an expansion of, an existing settlement prioritises locations within the SDA, but does not state that the focus is on the west of East Lothian as opposed to dispersed randomly throughout the SDA as it is defined for East Lothian. This is entirely at odds with the focus on the compact strategy committed to in the previous section and in Table 5 of the MIR.

APT Planning & Development on behalf of Cala Management Ltd / Cruden Homes (East) Ltd: CALA / Cruden supports the preferred longer-term settlement strategy approach to meet East Lothian's housing requirements up to and beyond 2024. East Lothian Council should be identifying a generous supply of land to ensure a mix of type and tenure as well as a geographical spread of housing throughout the County. Concerned that the range of sites identified at this stage in the process does not have the capability (effectiveness) to deliver the required number of units and at the required build rate by 2024. It has been recognised that the annual rate of new homes completion must equal the total number of homes developed in the five years between 2009 and 2013. Even taking into account the intensity of the recession, this is still a challenging target to say the least, made all the more so by seeking to concentrate most of the development in a relatively small area of the County. The best way to secure the development of the required number of new homes will be to have a genuine geographical choice of sites catering for all aspects of the market. The MIR highlights the importance of a willing landowner and states that confirmed developer interest may also be an important factor. CALA / Cruden are credible, well-known and well-regarded having completed a number of varied and high quality developments in East Lothian (in Cala's case most recently at Gilsland in North Berwick). The strategy for selecting development locations in East Lothian should be determined assuming all other factors remain the same, not predicted sector growth that will (hopefully) make previously unviable projects viable in contributing to the housing land supply. Against this backdrop it is imperative that the Council engages with landowners and developers to allocate a significant surplus of housing land to better act as a catalyst in housing provision. In Cala's case, the site at Drem is within the Strategic Development Area and represents a credible answer to the future housing land requirement where the first house can be completed by 2019 delivering over 100 homes to the East Lothian market each year to completion (2039). In Cruden's case, the site at Amisfield is within the Strategic Development Area and represents a credible answer to the future housing land requirement.

Geddes Consulting on behalf of Hamilton & Kinneil Estates / Wallace Land and The Sir John Hope Executry / Wallace Land and Gladys Dales Drylawhill Trust / Wallace Land / Hallam Land Management / Sirius Sport & Leisure: The scale of growth required in East Lothian needs to consider infrastructure requirements over the longer term to avoid promoting medium term solutions which inhibit future growth. The Council's preferred approach is to: Conform to the approved SDP and identify land which is able to be developed to deliver 6,250 homes to 2019 and a further 3,800 homes in the period 2019 – 2024, but do not limit the scale of land release to that which is needed to meet only those requirements. The LDP is required to allocate a generous housing land supply that takes account of a generosity allowance of between 10% and 20% over and above the SDP housing supply target. The LDP therefore needs to identify land which is able to be developed to deliver between 6,875 and 7,500 homes in the period 2009-19 and 4,180 homes and 4,560 homes in

the period 2019-24. The critical issue in the Council's development strategy is making sure that all allocations promoted in the LDP are effective in accord with PAN2/2010. In addition, the Council should be confident that its proposed allocations will deliver the scale of completions expected over the respective plan periods. This programming needs to be considered in consultation with Homes for Scotland. As it stands, the Council expects all of its established land supply (with the exception of Blindwells) to be built by 2024. This is not a reasonable assumption unless approved in consultation with Homes for Scotland. In addition, the Council needs to liaise with Homes for Scotland over the programming of completions from the preferred sites promoted as allocations in the LDP.

Geddes Consulting on behalf of T G Tait & Sons: The scale of growth required in East Lothian needs to consider infrastructure requirements over the longer term to avoid promoting medium term solutions which inhibit future growth. The critical issue in the Council's development strategy is making sure that all allocations promoted in the LDP are effective in accord with PAN2/2010 and as required by SPP (paragraph 119). In addition, the Council should be confident that its proposed allocations will deliver the scale of completions expected over the respective plan periods.

Cala Land Management Ltd c/o Holder Planning: In terms of the MIR's strategy for 'Planning for Housing', CALA supports the general intentions that underpin the preferred approach which is termed 'Plan for a longer term housing strategy'. Whilst this submission offers no specific comment as to the adequacy of the MIR in terms of identifying sufficient preferred housing sites to achieve the house building requirements of SESplan Policy 5 and the SESplan Supplementary Guidance, CALA recognises that the preferred approach acknowledges the two distinct housing requirements set out in the SDP (2009-19 and 2019-2024) and seeks to identify land which is able to be developed to deliver each of the requirements. The MIR's stated willingness to exceed those requirements is also supported. Upon analysis of Table 8: Planning for Housing, CALA is supportive of the following priorities given to the selection of new sites to meet the SDPs housing requirements: Intensify existing allocations that are located in the SDPs SDA if their capacity can be increased and provided development of the additional homes can start during the LDP period; Identify other appropriate new land in, or as an expansion of an existing settlement / expansion of existing allocation, prioritising locations within the SDA, but also include consideration of land outwith the SDA if required to maintain an effective five year housing land supply. New allocations could be of varying sizes, provided they can start and be substantially completed in the LDP period and do not undermine existing allocations or any expansion of them.

Persimmon Homes c/o Holder Planning: In terms of the MIR's strategy for 'Planning for Housing', Persimmon is supportive of the general intentions that underpin the preferred approach which is termed 'Plan for a longer term housing strategy'. While this submission offers no specific comment as to the adequacy of the MIR in terms of identifying sufficient preferred housing sites to achieve the house building requirements of SESplan Policy 5 and the SESplan Supplementary Guidance, Persimmon recognises that the preferred approach acknowledges the two distinct housing requirements set out in the SDP (2009-2019 and 2019-2024) and seeks to identify land which is able to be developed to deliver each of the requirements. The MIR's stated willingness to exceed those requirements is also supported. Upon analysis of Table 8: Planning for Housing, Persimmon notes the priorities given to the selection of new sites to meet the SDPs housing requirements. Persimmon particularly supports the following priority: Identify other appropriate new land in, or as an expansion of an existing settlement / expansion of existing allocation, prioritising locations within the SDA, but also include consideration of land outwith the SDA if required to maintain an effective five year housing land supply. New allocations could be of varying sizes, provided they can start and be substantially completed in the LDP period and do not existing sites or any expansion of them.

PPCA Ltd on behalf of Wallace Land Investments: Wallace Land supports the preferred approach to

planning for housing requirements in the period to 2024 and beyond but wishes to make representation to the continued reliance on both Blindwells for 1,600 houses and a proposed expansion to 4,600 houses given the ongoing uncertainty and concerns raised over deliverability by the Main Issues Report itself. Wallace Land wishes to make representation to the non-identification of land at Fenton Barns as a preferred new settlement opportunity as part of that. From this submission and the accompanying reports including the masterplan, a new settlement allocation for mixed use development, including circa 1,000 houses is a sustainable and deliverable housing solution that will contribute to meeting housing requirements and maintaining a five year housing land supply for the period to 2026 / 27 compliant with Development Plan policy and SPP.

Persimmon Homes: Persimmon Homes agree with the representation prepared by Homes for Scotland. We have been involved with its preparation and site programming, and its view is shared by Persimmon. We specifically agree with the housing allocations and deemed ineffective supply. However, all Local Development Plans need to consider the delivery of houses following the time periods as set out within the relevant SDP (SESplan). Persimmon supports the preferred strategy for planning for housing. Nevertheless we must highlight that ELC needs to consider the views of developers when considering future development, and continue to ensure that any sites that may be delivered in the future and within marketable locations. The Council needs to seriously consider allocation of the alternative sites in the future, and possibly outwith the plan period. Future planning is useful, specifically for such issues as infrastructure planning, especially in relation to education which is proving and is likely to remain an issue within East Lothian. The size and range of sites should also be considered to allow deliveries in the short, medium and long term of the plan. Smaller sites allow faster site starts in general. It would be encouraged that East Lothian de-allocate any site which has not delivered or shown any progress of delivery on the basis that SPP requires all local authorities to maintain a deliverable Housing Land Supply. Those sites which have previously been allocated but have shown no movement since 2008 should be removed, with new sites allocated in their place to ensure deliverability can be met.

Cardross Asset Management Ltd: ELC has an acute shortage of housing land within the LDP area. So the draft LDP must focus on sites for housing that are capable of delivery without prohibitively expensive or unviable remediation that can deliver housing units by 2019 to accord with SESplan.

Derek Scott Planning obo East Lothian Developments Limited: We agree that the emerging LDP should plan for a longer term settlement strategy to meet both the SDPs housing requirements as well as helping to contribute to signposting need and demand for housing post 2024. Whilst it is acknowledged that there are uncertainties associated with locational requirements post 2024 within the wider SESplan context it is important that allocations made now do not prohibit allocations in the future through poor or inadequate planning, particularly in respect of infrastructural considerations.

Barton Willmore obo Scottish Fire Service College: In line with SPP, the East Lothian LDP should provide a generous supply of housing land and an effective housing land supply that can come forward within the first 5 years of the plan. Whilst we support long term planning of housing land supply beyond 2024, this must be done with an adequate and effective supply provided pre 2024 and with consideration for increasing the generosity margin closer to 20% to make the provision of an adequate supply more likely. Provision of new housing within East Lothian –Site PREF-N5 The provision of housing on Site PREF-N5 at Gullane would contribute to the need for 11,288 houses in East Lothian over the 2009-2024 period, as set out in both SESplan Supplementary Housing Land Guidance (2014) and in the East Lothian MIR (2014). Whilst the site has an initial classification of 'Preferred' as set out in the East Lothian MIR, we have reviewed the site against the Housing Land Supply: Interim Planning Guidance (2014), and this site at Gullane, complies with the criteria set out

in that document. Were the site to provide hotel development, there would be a significant loss of housing capacity – approximately 30 units – and the hotel portion of the site is unlikely to come forward within 5 years due to limited demand. The suite can come forward quickly, towards the beginning of the next plan period, making it an attractive site in terms of maintaining an effective 5 year housing land supply.

Clarendon Planning & Development Ltd obo The Executory of the Late Sir John Hope: This approach is generally supported whilst noting that the preferred approach of an expansion of the existing Blindwells allocation has to be countered against the risk of non-delivery of early phases which will leave the Council in a similar position to that which exists now, i.e. over-reliance on one key location and a shortfall in effective housing land. The preferred approach is based upon a number of criteria including intensification of existing allocations, identifying expansions of existing settlements with priority to the SDA, consideration of land outwith the SDA, identification of allocations of varying sizes to allow completion within the LDP period plus identification of an expanded Blindwells development area or safeguard other allocation expansions for future development. It is considered that release of a smaller scale, deliverable site at The Loan, Musselburgh, which could be delivered within the LDP period, would wholly accord with this strategy.

Clarendon Planning & Development Ltd obo Barratt David Wilson Homes (Limeylands Road, Ormiston): This approach is generally supported whilst noting that the preferred approach of an expansion of the existing Blindwells allocation has to be countered against the risk of non-delivery of early phases which will leave the Council in a similar position to that which exists now, i.e. over-reliance on one key location and a shortfall in effective housing land. The preferred approach is based upon a number of criteria including intensification of existing allocations, identifying expansions of existing settlements with priority to the SDA, consideration of land outwith the SDA, identification of allocations of varying sizes to allow completion within the LDP period plus identification of an expanded Blindwells development area or safeguard other allocation expansions for future development. However, given the scale of existing allocations in this area, new deliverable sites must be identified in settlements outwith the SDA which are well served by public transport, such as Ormiston. It is considered that the release of additional land at Limeylands Road, Ormiston, which could be delivered within the LDP period, would wholly accord with this strategy.

Clarendon Planning and Development Ltd obo Barratt David Wilson Homes (land to the east of East Linton): The MIR confirms that, “SPP notes that LDPs should provide a generous land supply and promote a range and choice of sites to meet housing requirements. The approach to planning for housing in East Lothian must align with the SDP and its associated Supplementary Guidance on Housing Land.” These requirements extend to land for 6,250 homes in the period 2009-19 and a further 3,800 homes between 2019-24. Over and above these base requirements, Scottish Planning Policy requires a ‘flexibility allowance’ of 10%-20%. There is currently a severe shortfall in housing land supply to meet these targets and to maintain a 5 year effective housing land supply. The MIR notes that, “smaller sites may be more deliverable to meet short term requirements to 2019” and this is demonstrated by the slow progress of large-scale development areas allocated in the previous Local Plan (of the 4,800 homes required between 2004-15 across 6 key locations, only c.300 homes will have been delivered). In particular, Blindwells has yet to come forward and whilst this may be a major long-term solution, a range of smaller sites in the short to medium term can assist with filling this significant gap. It is considered that release of a suitably scaled development area on the eastern side of East Linton could be delivered in the LDP period would wholly accord with the MIR strategy.

Clarendon Planning and Development Ltd (Hillview Road, Ormiston): East Lothian must meet SPP and SESplan requirements and whilst larger-scale sites capable of delivering units throughout the LDP period (and beyond) are required, this must be augmented by a range of smaller-scale,

deliverable site which can be developed in the short term. This is demonstrated by only 7% of the previous Structure Plan requirement between 2004-15 being achieved on 6 large-scale sites (313 out of 4,800 houses). Notwithstanding core SDA settlements, given the scale of existing allocations in this area, new deliverable sites must be identified in settlements outwith the SDA which are well served by public transport, such as Ormiston. The MIR approach is generally supported but must ensure a sufficient range of smaller sites are included. It is considered that Hillview Road, Ormiston presents a deliverable smaller scale opportunity in a well-located settlement.

Clarendon Planning and Development Ltd obo The Traquair Family: As set out in Paragraph 5.35, East Lothian Council confirms that “SPP notes that LDPs should provide a generous land supply and promote a range and choice of sites to meet housing requirements. The approach to planning for housing in East Lothian must align with the SDP and its associated Supplementary Guidance on Housing Land.” In particular, Paragraph 5.36 notes that “Policy 5 of the approved SDP together with its associated Supplementary Guidance on Housing Land requires the LDP to ensure land is available for the delivery of 6,250 dwellings in the period 2009 to 2019 as well as for a further 3,800 dwellings in the period 2019 - 2024.” The Council’s own assessment is clear there is a need for approximately 2,000 additional completions by 2019 and this places a severe doubt on the ability of the Council to meet its national and strategic housing delivery obligations. It is noted that the Council’s preferred approach is for the allocation of land to accommodate in excess of the 10,050 unit requirement to 2024 due to the acceptance that larger sites cannot be completed within the necessary plan periods. This need for a range of smaller, deliverable sites is demonstrated through a review of achieved completions as against previous Structure Plan requirements for East Lothian: 7% of the required housing has been provided. In terms of spatial strategy, the notion that, “the preferred ‘compact’ spatial strategy is generally supported. The Council’s preferred approach is to identify land to meet the 2009-19 and 2019-24 requirements but not limit the scale of land release to meet just these requirements, i.e. allow for a scale to contribute to post 2024 demand. This approach is generally supported whilst noting that the preferred approach of an expansion of the existing Blindwells allocation has to be countered against the risk of non-delivery of early phases which will leave the Council in a similar position to that which exists now, i.e. over-reliance on one key location and a shortfall in effective housing land. It is considered that further growth at Old Craighall within the LDP period would wholly accord with this strategy.

Turley on behalf of Hargreaves UK Services Ltd and Mr R Kennedy: It is imperative that the LDP plans for the longer term in order to meet the housing requirements established by SDP and to meet mobile requirements in East Lothian. By following the compact growth scenario and allocating a Greater Blindwells within the proposed LDP there is scope to meet housing requirements significantly beyond the LDP period. This will allow a fully coordinated approach with other key services within ELC such as Education and Transport to ensure that infrastructure is considered and development is located within those areas where the greatest demand exists and where this can be satisfied. Furthermore NPF states on page 13 “The SESplan area is projected to have the second largest rate of growth of the four SDPAs – a 20% increase in population and 32% increase in households between 2010 and 2035. A planned approach is required to ensure development needs are met, whilst taking into account existing and future infrastructure capacity. Led by SESplan, we wish to see greater and more concerted effort to deliver a generous supply of housing land in this area.” It is evident from this statement that the Scottish Government anticipate that a generous supply of housing land should be allocated within the LDP area, our clients consider that East Lothian Council should be making ambitious housing allocations to cater for the increase in population.

Ryden on behalf of the Wemyss & March Estate: The preferred strategy for Planning for Housing is to plan to meet housing requirements by a) firstly completing the existing strategy by intensifying or expanding existing allocations where possible and appropriate, b) identify appropriate new sites of

different types and sizes to help meet requirements, c) define an area of search within which Blindwells may expand and d) safeguard appropriate land for potential longer term development opportunities. WME/SCC supports this preferred strategy but is pleased the East Lothian Council recognises the need for substantial new housing allocations in order to meet the housing land requirement identified in SESplan. The new allocations can reflect more closely the implications of the Climate Change (Scotland) Act and the new policy principles identified in the Scottish Planning Policy, particularly the presumption in favour of sustainable development and an emphasis on placemaking. East Lothian Council must use the opportunity presented by the renewal of the Local Development Plan, to ensure the right development goes to the right place. It is the view of WME/SCC that Longniddry South represents the right development in the right place and that it should be identified as a new allocation for 450 homes with the potential for a wider area safeguarded for longer term opportunities.

George F White LLP on behalf of Mr M Steven / Mr D Lockie: Our Client is in general agreement with the preferred approach to plan for housing post 2024. The rate of which housing development will be delivered (following approval) is not within the control of the planning authority. Therefore a wide variety of allocated sites need to be brought forward, so that smaller sites may have the ability to be developed within a shorter timeframe, to meet the SESplan requirements for 2019 and 2024. The larger housing site allocations, such as Blindwells, have the ability to be brought forward over a longer timeframe so the service provision associated with them can be planned and provided for over an appropriate timeframe. Our Client's site is a logical extension to the village of Macmerry and is accessible for early delivery in the plan period.

Colliers on behalf of Taylor Wimpey and Mactaggart and Mickel: The Preferred Approach as set out in Table 8 of the MIR is to plan for a longer term housing strategy, responding to the requirements of the SDP but not limiting the scale of land release to that which is needed to meet only those requirements. This is supported. This approach includes forward-planning for an expanded Blindwells settlement which could accommodate a proportion of this future growth. This is also supported. The strategy going forward must spread growth throughout existing settlements across the SDA. In light of the above it is concluded that the extension to the existing allocation H3 on land to the west of Haddington at Letham Mains (PREF-H2) should continue to be supported in the emerging proposed Local Development Plan. Importantly, the Council's Interim Planning Guidance on Housing Land Supply noted that the shortfall in the 5 year effective housing land supply stands at 1,156 homes in the period to 2019. The Council should be prepared in the short term by supporting planning applications for housing that meet the criteria detailed in its Interim Planning Guidance.

Chalmers & Co: For developments of a scale that are proposed in this MIR, 10 years is short of the mark relative to the investment required but also to the time taken to get proposed developments through the planning process. A criteria-based method for evaluation is proposed for development generally in the rural areas, noted in the Charter for Appropriate Rural Development. The area-based method can lead to a very narrow assessment of suitability which encourages infrequent, yet usually significant impact on villages and towns rather than incremental growth that can be absorbed. If Blindwells does not come forward, the shortfall is likely to be severe. Reference is made at 5.35 to the SPP guidance to the council to promote a range and choice of sites to meet housing requirements. This is not evident in rural areas and would appear to be an issue urgently in need of address. The demand for housing over the next ten years would appear to be unrealistic and likely destroy prime quality farmland. Allocation of so much prime agricultural land for housing land has been described as being akin to vandalism. If the new communities are set to serve Edinburgh, East Lothian should be regarded differently to what exists to the west of the capital.

Community Councils and local interest groups

Prestonpans Community Council: The PCC prefers the reasonable alternative. However, in any event the PCC is strongly of the view that the LDP must first set its overall vision for the county. This will inform the county's ability (and desire) to accommodate housing. Separately, we believe that it is not in the interests of the people of the county to have housing policy dictated purely by numbers of housing units based on projected demand. Rather, ELC should monitor actual housing deliveries during the period from now until 2019, to see whether the projections which form the basis of the SES Plan prove to be correct, and then agree and defend allocations for the period after 2024 on the basis of that review. The community of Prestonpans opposes a policy of unlimited housing in its immediate environs, as this would undermine the unique and attractive characteristics of the area for its residents, as well as for visitors.

Gullane Area Community Council / Dirleton Village Association: In the light of government policy it seems inevitable that the Council should follow the preferred approach and consider making provision for housing need and demand beyond 2024. As the main driver for this need seems to be the economic expansion of the Edinburgh city area, we are strongly of the view, that provision should be primarily within the Strategic Development Area and in particular within the western part of it, being that closest to Edinburgh. Thus residential development should occur nearest to where there are employment opportunities and the need for lengthy commuting to work should be minimised. Particular concern has been expressed at all our village meetings that, as indicated in our answer to question 4 above, all the new housing development proposed, in particular that at Wallyford, Blindwells and south of Longniddry, will put considerable strain on the road network leading onto the A1 and into Edinburgh. This will particularly affect the Musselburgh, Tranent and Macmerry junctions, as well as the Old Craighall interchange further west, all of which we think would require significant upgrading. It also seems likely to have the effect of pushing traffic onto unsuitable minor roads in areas adjacent to and joining the A1.

Cockenzie and Port Seton Community Council: Support reasonable alternative and would prefer if green belt land was not used for new housing developments.

Ormiston Community Council: We agree that the Council should plan for a longer term housing strategy. It would be regrettable if greenfield sites were developed rather than progressing the brownfield development at Blindwells with scope for expansion there.

North Berwick Community Council: Generally we support the preferred option while acknowledging that the impact of increased housing will be considerable and plans may need to change to accommodate this.

Humbie, East and West Saltoun and Bolton Community Council: The preferred approach is supported. Growth of communities should occur in a planned manner. This allows consideration to be given to the wider needs of the whole community. It is important that the LDP ensures a gradual expansion of communities to ensure that new and existing communities can be integrated. Large and sudden expansions will threaten the vibrancy of existing communities.

Bolton Steading Residents Association: The preferred approach is supported with the caveats indicated in the relevant other sections of this response and otherwise we endorse the comments made by the Humbie, East & West Saltoun and Bolton Community Council.

Musselburgh Parish Grouping of the Church of Scotland: It makes sense to anticipate longer term trends, but not to be bound by them.

Association of East Lothian Day Centers: agree with the reasonable alternative as in the preferred option once identified as a potential site it is more difficult to refuse what might be unwelcome development. An overload and major infrastructure problems are more likely to occur in these locations and a high risk of take up in certain developer preferred areas (areas of maximum profit).

Sustaining Dunbar / Common Weal Dunbar: In principle agree with preferred approach and agree with enlarging existing developments. However, we would like to see a move away from low-density suburban sprawl towards active promotion of alternative models of development including high-density, low-rise development, provided it is of high quality in terms of design and construction and provides a balanced mix of property types to encourage a diversity of households. We would also like to see active support and promotion of community led developments such as co-housing and support for provision of self-build opportunities, including through use of community land trusts. All developments must require provision of open space for community gardens and allotments. Streets and open spaces should be designed to encourage informal social interaction and active travel.

Haddington & District Amenity Society: support planning for a longer – term settlement strategy. Housing allocations should be of a scale that allow for settlements to respond to increased population and for local requirements for each settlement of around 50-100 and not large allocations of 100-1000. Sites for self build housing should form part of the new allocations. First time buyers housing should also form part of any new allocations.

Aberlady Conservation and History Society: believe that development arising from housing demand from Edinburgh should be met as close to the city as possible to avoid unnecessary traffic and journey time increases.

Architectural Heritage Society of Scotland: Long term planning is preferable whenever possible and reliable. Any allocation should be governed by the capacity of the existing settlement to accept change, and of course the capacity of the infrastructure. New allocations should include sites for self-build, and also houses specifically for first time buyers.

Scottish Green Party East Lothian: In principle we agree with the preferred approach and agree with enlarging existing developments. However, we would like to see a move away from low-density suburban sprawl towards active promotion of alternative models of development including high-density, low rise development, provided it is of high quality in terms of design and construction and provides a balanced mix of property types to encourage a diversity of households. We would also like to see active support and promotion of community led developments such as co-housing and support for provision of self-build opportunities, including through use of community land trusts. All developments must require provision of open space for community gardens and allotments. Streets and open spaces should be designed to encourage informal social interaction and active travel. The existing rail service is at full capacity at peak times. Further demand for travel to Edinburgh will require extra rail and bus services to avoid people defaulting to car use to commute. Provision for bicycles on trains is woefully inadequate at present and will be even more so with a larger population. Cycle routes need to be developed which are safe and separated from cars.

Rail Action Group, East of Scotland: We consider that additional housing should not be planned unless transport links for employment and social activities are also planned, to avoid having large car-dependent housing sites.

Members of the public

Preferred Approach

- Integrated long term planning is superior to a piecemeal short term planning approach which can be distorted by developers commercial interests;
- Preferred approach supported but a lot of risk to be managed. If other councils are taking a short term view there may be a future risk that when the next round of allocation is spread East Lothian gets far more than its fair share because people say 'you already have plans for all this' so we can now add even more to your quota;
- While it seems logical to go with the preferred option, there is doubt over the council's ability to control it because developers' 'use' the planning appeal process to get their own way;
- East Lothian is semi-rural, and that is its attraction. The west of East Lothian will be transformed when Blindwells comes on-stream and will not really be able to claim that it provides a 'rural lifestyle' for residents;
- There has to be long term planning for expansion as it's the only way that Edinburgh is going to go. Limiting housing can only lead to the sorts of chaos that have been seen in England, where building started but stopped because another developer produced more housing and the quota was reached leaving people unemployed and half completed housing;
- A new larger development will be better than lots of little add-ons around the county. It should also attract better investment and would have to provide proper new schools rather than adding classrooms on to already existing schools;
- Long term vision preferred so that thinking can be 'joined up'. It can always be reviewed down if development does not evolve as envisaged;
- Historical evidence would suggest that there will be a continuing demand for new housing in East Lothian. It makes sense to look to the future and make the best decisions now in the context of where further housing could be provided;
- We have to plan ahead otherwise we will be left with disjointed housing schemes and poor infrastructure;
- Given the commitment to build 10,000 homes the preferred option would seem correct;
- Support preferred strategy for compact growth in the west of the County, but believe that the additional preferred sites should be limited, for example to one site per town;
- The long term always needs to be considered and planned for. However, each housing application needs to be considered on its own merits. There is a danger, because of the large numbers of housing needed that plans will be passed simply as a numbers exercise, rather than taking into account what is best for existing communities;
- A longer term perspective, as in the preferred approach, is the most sensible;
- The development of Blindwells is an obvious strategy that uses brownfield land, is a "blank canvas" so development can be planned and phased and the proximity to the east coast railway line & the A1 provided excellent transport links;
- A long term plan is needed because otherwise the Council can get away with adding new developments in increments of a few hundred houses or so indefinitely, each time arguing that it is not a huge increase, and that it therefore does not justify a huge addition to infrastructure (e.g. a new route over the A1 in Dunbar, or a new school as opposed to a few more portacabins);
- East Lothian Council must look beyond the period ending in 2024 and should be looking 20 years ahead and in doing so it must look at the impact of development on people as well as infrastructure requirements, including transport. Further housing beyond 2024 must look at a forward thinking dispersal option where we create communities, not high density areas which become merely a place to sleep with no community heart;
- Unforeseen changes in circumstances may render long term plans irrelevant, but

consideration of needs beyond the current plan will help avoid problems arising from a later round of add on developments which do not fit well with infrastructure;

Reasonable Alternative

- The LDP needs to explain the derivation of housing allocations with great clarity, including the fact that the Housing Land Supplementary Guidance to the SESplan SDP sets out the allocation to 2024 as follows: existing (Established Land Supply and Other Factors) 6,485; new allocation within the East Lothian SDA, 3,560; new allocation in East Lothian outwith the SDA, 0. I would like a clear annual publication of the five-year land supply and an approach to Policy 7 of the SESplan SDP that makes it clear this policy is not being used to sidestep the spatial strategy of concentrating development in the SDA;
- The Preferred Approach could lead to significant over development in the west of the County;
- There could be a risk of developers holding off from developing land in less desirable areas if they think they may be able to develop where they will make more money;
- Develop an adequate site at Blindwells and monitor the effects on local traffic, facilities and see if the extra houses are actually required. Further building can always be done at a later date - hopefully at a site with access to the A1 and railway that does not cause congestion;
- The alternative approach of complying only with the specific actual demands of the SDP is supported, as this is the only legal requirement. The safeguarding of the entire Blindwells site for future development, even at the same building density as the initial allocation, would permit the construction of at least 8,000 more houses. Otherwise, SESplan requirements can be met elsewhere than in East Lothian where land availability is increasingly scarce, even though major infrastructure investment will be required in advance to support such alternative sites. On the other hand, the right amount of major investment would provide a new baseline for future land development away from the already-overcrowded A1 corridor. Is there a need to plan now for SDP projected housing needs that may evaporate in future years? Land for further development in the long term should be sought but no action taken that would impact on its value or its current use;
- Given the uncertainties around the growth predictions, and economic forecasts a five year strategy might be more effective, to avoid having a rush into development without clear prioritisation of the most beneficial sites. If the need is to build houses at the rate dictated by the government, it could be the opportunity to develop Blindwells as a long-term and effective centre is undermined by the need to produce a ridiculous number of homes within the period to 2019;
- If there is an oversupply of housing land developers will 'cherry-pick' the sites for development and ignore ones that are more difficult but strategically more important;
- Housing and population growth in East Lothian should be minimised;
- The Reasonable Alternative provides sufficient safeguard for housing land and avoids potential issues associated with over allocation, e.g. land values, planning blight, underutilised land parcels and similar;
- There seems little point in releasing land for development without clear evidence that it is needed. This is pandering to the interests of developers at the cost, very often, of green amenity for existing residents and the loss of fertile agricultural land;
- In the long term, generations ahead will bitterly regret the loss of food-producing land;
- Some local areas, such as Old Craighall, cannot support growth due to the current overloading of infrastructure;
- We can see beyond 2024 and another plan would need to be considered by that time as the houses would not be built as they are to be build to demand;
- It seems on the face of it to be sensible to plan ahead for future development, but there are serious problems with that approach. There is uncertainty about what the future targets will

be and the population projections may change;

- The logic of the preferred option in comparison to the reasonable alternative is not clear and the latter looks a more sensible approach in balancing a number of unknown factors;
- Not limiting the scale of land release could allow developers to force through large developments that adversely affect existing settlements. Better to make Blindwells a significant town with suitable infrastructure and have it be a self-sustaining community;
- As much agricultural land as possible should be safeguarded in East Lothian and therefore a larger Blindwells site and sites closer to Edinburgh is favoured;
- Planning too far ahead can result in a miss - allocation / miss use of vital resources;
- The target of 10,000 completed houses between 2009 and 2024 (15 years) is unrealistic, when in the first 4 of these years only 1,300 houses have been completed. The current supply would seem to be adequate until 2024 at that rate. If efforts could be concentrated on speeding up the development of Blindwells which has the potential for 4,600 homes then the period immediately post 2024 would also be provided for;

Neither Approach

- Brownfield sites should be explored first before building on flood plains and green spaces;
- Plans to build on green belt, expand towns in the west of the county are not the answer - Prestonpans, Tranent and Port Seton have expanded enough - build houses in Gullane North Berwick instead;
- Some respondents did not understand the terminology used and felt this inhibited their ability to respond and found this frustrating;
- Each planning application should be consulted on an individual basis, not driven by generic numbers for the area as a whole;
- Housing should be sensitively built with local knowledge of the fields proposed. Most green field sites should be developed with extreme caution and the need for affordable, properly affordable, housing should be strongly considered. Most rural locations in East Lothian cannot support large developments. The roads, rail and buses do not support easy travel;
- Whilst population in the area is likely to increase, it is very uncertain who will be able to afford the new houses that are being proposed. Younger people will be more likely to stay at home for a much longer period than has been typical over the last 20 or 30 years. The SDP should look to other countries to see how they have address this housing need and perhaps consider increasing densities in the Edinburgh area and allocations to the west of the city. Community Self build projects could also be promoted as a means improving housing supply;
- No reference to identification and use of brownfield sites for housing development first. I appreciate that the volume of housing specified for East Lothian is unlikely to be met by this method alone but I would wish to see it included as a first option in both the preferred approach and the reasonable alternative;
- Expanding settlements within certain areas will lead to the loss of identity particularly in Musselburgh, Dunbar and Tranent. There could also be more housing built in the east of the county particularly the North Berwick region;
- Housing allocations should be of a scale that allows existing communities to respond to increased population. This should be local requirements of each settlement 50-100 is the preferred maximum not 100-1000. More consideration should be made to relaxing the very strict planning restrictions in the rural areas - maybe expanding farmsteadings and allowing discrete individual dwellings;
- Continuing expansion of existing settlements spreads the problems of infrastructure provision over many sites rather than at a few sites where they can be dealt with comprehensively.

KEY MESSAGES

- A majority of respondents overall support the preferred approach of planning for a longer term housing strategy, not limiting the scale of land release to that needed only to meet SESplan requirements up to 2024;
- Those in support include Scottish Environment Protection Agency, Midlothian Council, Homes for Scotland and the RSPB, and a clear majority of landowners/developers, and around half of the members of the public who expressed a view:
 - Reasons for supporting the preferred approach included the ability to have:
 - a vision for the future;
 - longer term plans for infrastructure provision and avoiding decisions that would inhibit future growth;
 - provision of a generous land supply;
 - ability to intensify existing allocations;
 - more certainty around investment decisions;
 - development better integrated with opportunities for habitat creation;
 - a long term strategy that reflects the current HNDA estimates of need and demand in the SESplan region beyond 2024;
 - In the context of the compact strategy (Table 5 of the MIR), some respondents suggest that it is logical to follow the sequence of considerations set out in the MIR for the preferred approach when planning for housing (intensify existing allocations, identify new land prioritising the SDA and then consider locations outwith it to maintain a five year effective land supply, identify a Blindwells Development Area and / or safeguard an area for it / expansion of it, and safeguard land for future consideration – See Table 8);
 - Homes for Scotland and some landowners / developers suggest that not all existing allocations should be retained and that the potential de-allocation of sites should be considered alongside new sites, ensuring all are marketable, deliverable and effective;
 - Some respondents have suggested that Blindwells will have an important role in contributing to Housing Land Requirements up to and beyond 2024;
 - Some respondents suggest that a wider range of housing tenure and delivery options are needed, including specialist provision and self build;
- A minority of respondents prefer the reasonable alternative of planning only for currently known housing land requirements. Those in favour of the reasonable alternative were mainly members of the public, and a small number of landowners/developers:
 - Reasons for supporting the reasonable alternative approach included:
 - Only the SDP level of growth should be planned for and not exceeded as current housing land requirements may change in future;
 - An over allocation of land may lead to less attractive sites being developed before strategically important ones, and these should not be undermined;
 - Potential for a misalignment of development with funding and infrastructure;
 - Growth should be minimised as should the impact on existing communities, including in the west of the county;
 - Every application should be assessed on its merits;
 - Blindwells should be the longer term option;

- Some submissions suggest that SDP Policy 1A/1B and Policies 5 – 7 allow consideration of a wider area than would be the case under the 'compact' approach;
 - Some respondents suggest that it is illogical to follow the sequence of considerations set out in the MIR for the preferred approach when planning for housing (intensify existing allocations, identify new land prioritising the SDA and then consider locations outwith it to maintain a five year effective land supply, identify a Blindwells Development Area and / or safeguard an area for it / expansion of it, and safeguard land for future consideration – See Table 8) because they feel this contradicts Table 5 of the MIR;
 - Some respondents have suggested that Blindwells cannot be depended on as contributing to housing land requirements up to or beyond 2024;
 - Some submissions suggest that promoting a longer term strategy in the emerging LDP would encourage more development in East Lothian when it may be better delivered elsewhere in the SESplan area;
- The Scottish Government made no comment on the options in respect of the potential approaches set out when planning for housing, but it did request that the LDP, or Monitoring Statement, set out any HNDA findings with regard to specialist housing provision, Gypsies/Travellers and travelling show people (although the intention of introducing a criteria based policy for this was noted), houses in multiple occupation, and homes for service personnel or for people seeking self build plots should be referred to;
 - Some respondents suggested that a further 10 – 20% generosity factor should be added to the Housing Land Requirements set by the SDP and its associated Supplementary Guidance on Housing Land (see also Question 18);
 - Some respondents suggested that the LDP will need to cover the period to 2026/27;
 - Some respondents felt that there was a need for more smaller sites which are deliverable in the short term to be brought forward, particularly up to 2019;
 - Some respondents felt the Council should support planning applications for housing that meet the criteria detailed in its Interim Planning Guidance to further help resolve short term supply issues before the LDP is adopted;
 - Some respondents suggest a range and choice of site sizes and locations in and outwith the SDA, including in the countryside, will be needed to maintain an adequate five year effective land supply;
 - There is concern that the rate of development may undermine community vibrancy and was unrealistic generally;
 - Some respondents highlighted that sustainable urban design, layout and construction with a mix of uses, house types and tenures as well as delivery approaches (including self build) will be essential to secure high quality outcomes.

Issue: Green Belt	MIR Question: Question 7
Total number of responses on issue	144
Support for preferred approach	71
Support for alternative approach	41
Support for neither approach	22
<p>Scottish Government, key agencies and adjoining authorities</p> <p><u>Scottish Government</u> - no specific comment</p> <p><u>East Lothian Council (Landscape & Countryside)</u> - support the preferred approach</p> <p><u>Scottish Environmental Protection Agency</u> – concerned about the general environmental impact of development rather than the impact on green belt, particularly the lack of water storage areas which could lead to increased flood risk.</p> <p><u>Scottish Natural Heritage</u> - note that the preferred approach will lead to substantial change to the green belt and its boundary. To protect the area’s high quality environment and special identity protection of natural assets including landscape is required to maintain the character and landscape setting of settlements. Goshen Farm has strong landscape assets in a strategic location that should be retained and incorporated into development to provide a wider setting and separation between nearby settlements. Robust development frameworks and briefs will be required.</p> <p><u>Scottish Environment Protection Agency</u> - SEPA has no interest in the Green Belt as such, but in respect of the preferred strategy requires consideration to be given to the potential loss of water storage areas which could lead to increased flood risk to new and existing communities and could affect new and existing communities. The reasonable alternative strategy could have impacts on air quality (and human health) and CO2 emissions (and climate change). These impacts are possibly more difficult to avoid than, for instance, increased flood risk if land for release from the green belt was carefully identified.</p> <p><u>Scottish Water</u> - no specific comment</p> <p><u>Midlothian Council</u> – acknowledges East Lothian Council will have to alter green belt boundaries to accommodate SESplan requirements Supports the preferred approach as long as there are landscape improvements associated with the loss of land for development. Would support such green network improvements being promoted across appropriate local authority boundaries.</p>	
<p>National interest groups</p> <p><u>Royal Society for the Protection of Birds</u> - support the preferred approach to in particular the emphasis on retaining/creating green space between and within settlements and a network of wildlife corridors</p> <p><u>National Trust for Scotland</u> - Landscape character and settlement identity are potentially under threat due to the Scottish Government’s housing targets. Clear and objective criteria must be published so that residents can see how any release of green belt has been assessed and agreed upon. East Lothian Council should also challenge neighbouring local authorities on their intention to</p>	

release green belt for housing where it impacts upon the character and setting of East Lothian settlements.

Homes for Scotland - support the preferred option as it provides the greatest flexibility in terms of ensuring the rights range of sites are identified

Architectural Heritage Society of Scotland – green belt modification should be done in coordination with City of Edinburgh Council whose strategic boundary it remains. Green belt should prevent coalescence of settlements

Landowners, developers and agents

Support Preferred Approach:

Strutt and Parker for landowner at Eskfield cottages - support the strategy where long term defensive boundaries can be redrawn and coalescence of settlement does not occur.

Whitehill Lodges - support the preferred strategy and do not support the green belt at Wallyford. They also believe that low impact holiday chalet development should be supported in the green belt.

Montagu Evans on behalf of Buccleuch Estates - support the preferred strategy.

Rick Finc Associates on behalf of the landowners of the site they term 4FD[to south of Letham House, Haddington] - support the preferred approach as it is inevitable that green belt land will be required for development to meet the housing requirement of the SDP.

Gladman - preferred approach accords with the objectives of greenbelts and is a proactive and positive planning practice to review greenbelts

Ashfield Land - supports the preferred strategy and believes the reasonable alternative to be incompatible with Scottish Planning Policy in relation to green belt and SESplan.

Geddes Consulting for Hamilton & Kinneil Estates; Wallace Land and the executory of Sir John Hope; Wallace land and Gladys Dale's Drylawhill Trust; Wallace Land; Sirius Sport and Leisure; Hallam Land Management – notes that the Council's approach accords with Scottish Planning Policy. Suggests that SESplan Policy 7(b) be taken into account in the local development plan policy framework – to allow planning permission to be granted on greenfield land within the green belt in circumstances where the Council is unable to maintain a 5 year housing land supply.

Geddes Consulting for Lothian Park Ltd. (employment site at Old Craighall) – welcomes the removal of land at Old Craighall from the green belt.

Rick Finc Associates for Hallam Land Management (site at Dolphinstone) – Green belt is of limited value at Dolphinstone and is a logical amendment to the boundary. The 2008 landscape review of the green belt is not relevant or credible in the current circumstances. Goshen Farm threatens the stability of the green belt in this area.

Rick Finc Associates for The MJ and V Rennie Trust – inevitable that green belt land will be needed for development to meet housing requirements. The reasonable alternative approach is not realistic or credible given the development pressures in East Lothian.

Persimmon Homes – the preferred option for the green belt allows best flexibility to ensure a wide range of sites are selected and to help prevent coalescence

Cardross Asset Mangement Ltd. – East Lothian Council should remove green belt sites selectively to achieve housing and employment objectives

Clarendon Planning on behalf of the executory of the Late Sir John Hope – preferred approach supported in terms of releasing land to meet housing requirements with specific applicability to sites where benefits outweigh current green belt designations. Goshen and Wallyford would result in planned coalescence. Site at The Loan Musselburgh next to the rail station has good public transport.

Clarendon Planning on behalf of The Traquair Family – Land at Old Craighall lies close to Shawfair and Musselburgh rail stations, would not create coalescence and new long term defensible green belt boundaries could be defined.

ScottHobbs Planning on behalf of Ashfield Land – supports the preferred approach to the green belt and considers the reasonable alternative to be incompatible with Scottish Planning Policy in relation to green belt and SESplan.

Scott Hobbs Planning for Queen Margaret University - supportive of the modified Green Belt boundaries as outlined for the Musselburgh Cluster, subject to an appropriate mix of uses being allocated.

Support Reasonable Alternative Approach:

Landowner at Dirleton – Green belt is an important and valuable amenity for Edinburgh and the towns which surround it and should be preserved as a priority.

Support Neither:

East Lothian Produce - raise concerns about the loss of prime agricultural land for development asking whether this is sustainable in the long term.

GL Hearn for Co-operative Group – Suggest that land for housing should be allocated on the Co-Operative Group land at Tranent in lieu of land in the green belt.

Community Councils and local interest groups

Humbie, East and West Saltoun and Bolton Community Council – support the preferred approach

North Berwick Community Council – support the preferred approach as it is important to maintain space between different communities and safeguard flora, fauna etc. whilst avoiding coalescence.

Gullane Area Community Council – no specific view on the green belt but generally favour the Council's preferred approach

Prestonpans Community Council – support the reasonable alternative strategy and does not wish to see the green belt eroded.

Cockenzie and Port Seton Community Council – support the reasonable alternative approach as

green belt policy should protect natural spaces; modifying its boundaries defeats this purpose.

Dunpender Community Council – support the reasonable alternative approach to protect unbuilt land around Edinburgh

Association of East Lothian Day Centres - would prefer to modify the green belt areas but still retain a buffer zone on the East side of Edinburgh.

Dirleton Village Association - no specific view on the green belt but generally favour the Council's preferred approach

Haddington & District Amenity Society – support neither approach. Green belt should be used to protect coalescence to the east and south. East Musselburgh would support development on a smaller scale that proposed.

Aberlady Conservation and History Society – development arising from housing demand from Edinburgh should be met as close to the city as possible to avoid unnecessary transport journeys

Common Weal – prefer development within existing boundaries or on brownfield sites

Bolton Steading Resident's Association – would advocate protection of as much green belt as possible at the eastern fringes of Edinburgh, Musselburgh, Tranent and Prestonpans.

Goose Green Tenants & Residents Association Musselburgh and Ravensheugh Tenants and Residents Association – unclear what the green belt changes would be.

Members of the public

Summary of responses

Members of the public were almost equally split on the approach to the green belt. Where comments were given these are summarised below:

Supporting preferred strategy:

- Given the scale of development required loss of green belt seems inevitable.
- Support some boundary alterations but concerned over coalescence of communities
- Green Belt should be protected except in areas close to railway stations
- Reluctant and sceptical support as developers given an inch will take a mile; Emphasis on green corridors is welcome
- Using green belt is preferable to using land in more remote rural areas
- Edinburgh needs to expand and there is land near the A1 and QMU that could be used

Supporting alternative strategy:

- Green belt in perpetuity is vital to retain the separation of communities like Prestonpans, Cockenzie, Tranent, Wallyford, Musselburgh
- Green belt should be managed as parkland or agricultural land
- No industrial development on land at Prestongrange Museum
- Do not keep moving the goalposts - endless growth should not be an ideal; places can reach capacity
- Prioritise brownfield sites first
- The region's agricultural base needs to be protected for our national food security.

- Maintaining natural landscapes has to be prioritised over development that lacks character, community natural habitats and open land
- Modifying boundaries will set a precedent of continual encroachment
- Concern that further green belt deletion would lead to Musselburgh and then Prestonpans becoming part of/a suburb of Edinburgh
- Green Belt provides a boundary to the city and main towns and should be retained
- Population and housing growth should be minimised instead
- No justification for using green belt as there is land elsewhere
- Quality of life and greenspace should come before industrial and housing development
- Green belt boundaries should be fixed, not be a moveable feast

Comments from supporting neither approach:

- The green belt needs to be preserved where there are objective qualities worth preserving (landscape, nature, history, place), not because of a line on the map.
- A green belt is restrictive especially for public transport; green wedges would be better

KEY MESSAGES

- **Overall more respondents support the preferred approach to the Green belt than the reasonable alternative. This included qualified support from the key agencies who responded with Scottish Natural Heritage noting that protection of natural assets is required including longer term landscape safeguards and strategic green network connections including within some areas proposed for development such as Goshen Farm.**
- **Humbie/Saltoun/Bolton, and North Berwick Community Councils support the preferred approach with Prestonpans, Cockenzie and Dunpendeer supporting the reasonable alternative approach.**
- **Most landowners, developers and agents support the preferred approach to the greenbelt.**
- **Members of the public and local interest groups were equally split on whether to support the preferred or reasonable alternative approaches to the green belt. Some loss of land in the green belt was seen as inevitable particularly in the area closest to Edinburgh but there was an expressed concern over the potential coalescence, including the west becoming a suburb of Edinburgh, and loss of identity of settlements. Some saw loss of green belt land as preferable to loss of land in more remote rural areas, others saw green belt land as all the more necessary to protect because of its potential scarcity in the face of large scale development.**

Issue: Countryside Around Towns	MIR question: Question 8
Total number of responses on issue	168
Support for preferred approach	104
Support for alternative approach	28
Support for neither approach	15
<p>Scottish Government, key agencies and adjoining authorities</p> <p><u>Scottish Government</u> – in designating Countryside Around Towns areas it will be useful to explain the relationship between them and Special Landscape Areas that are to replace AGLVs. They will both have a role in protecting local landscapes which could usefully be explained.</p> <p><u>Historic Scotland</u> - Countryside Around Town designations may contribute to the protection of the setting of historic environment features, in particular conservation areas.</p> <p><u>East Lothian Council Countryside</u> - supports the principle of and proposed areas for Countryside Around Towns which would provide a greater defence of this landscape than could be achieved through policy DC1.</p>	
<p>National interest groups</p> <p><u>Homes for Scotland</u> - objects to the introduction of an unnecessary new policy constraint; a generous supply of marketable and otherwise deliverable housing land will provide sufficient protection against inappropriate development elsewhere.</p> <p><u>Scottish Wildlife Trust</u> - supports the suggested policy and would like to see a commitment to landscape or habitat enhancement in these locations rather than just preservation of existing landscape.</p> <p><u>The National Trust for Scotland</u> – supports the preferred approach. Commends the efforts to recognise the value of the East Lothian countryside and coast for residents and visitors. Countryside Around Towns policy at East Linton should be extended to include land north and east of the Tyne.</p> <p><u>The Architectural Heritage Society for Scotland</u> – supports neither approach but states that settings of settlements are central to the character of East Lothian and that designed landscapes and woodland should be included in any proposed CAT area. As East Lothian has few towns, a different name should be given to the policy e.g. country belt.</p>	
<p>Landowners, developers and agents</p> <p>Support the Preferred Approach:</p> <p><u>G H Johnston Consultants Ltd. for land at Speedwell Gardens Dirleton</u> – supports the preferred approach.</p> <p><u>Nathaniel Lichfield & Partners for Bourne Leisure Ltd.</u>– supports the preferred approach to protect the setting and identity of settlements outwith Green Belt. East Lothian’s valued environment supports tourists. Policy should support tourist development in CAT specifically caravan park</p>	

development.

Scott Hobbs Planning for In-Site Property Solutions Ltd. – no objection to the preferred approach providing the development needs of Haddington are generously met to avoid constraining its growth.

Scott Hobbs Planning for Scottish Power Generation Ltd. – supports preferred approach. Redevelopment of former coal store at Cockenzie should not be harmed by tightly drawn boundaries.

Geddes Consulting for on behalf of Wallace Land and The Sir John Hope Executry – supports the preferred approach but argues against the need for a new policy that inhibits development on greenfield sites around existing towns.

Cockburns Consultants for Cappoquin Properties: - agrees with the preferred approach.

Support the Reasonable Alternative:

Landowner at Dirleton for Foreshot Terrace site – existing policies and designations have guided development to appropriate locations; new policies are not required. Countryside Around Towns is essentially arbitrary, subjective and therefore discriminatory to landowners and could result in legal challenges.

Walker Group - A generous supply of marketable and otherwise deliverable housing land should provide protection enough against inappropriate or harmful development elsewhere.

Rick Fink Associates for site they term 4FD at Haddington; MJ and V Rennie Trust for land at Sherriff fields West Barns; Hallam Land for land at Dolphinstone – no need for additional protection policy. Could restrict delivery of housing land. Need for further justification for Countryside Around Towns areas.

Gladman Developments Ltd.- inappropriate way to restrict SDP Policy 7; unduly restrict development and be a significant barrier to achieving and maintaining a 5 year land supply; justification is flawed; insufficient evidence to justify proposed areas; would bring in another green belt type policy; duplicate other policies.

Geddes Consulting for Hamilton & Kinneil Estates; Lothian Park Ltd.; Wallace Land and Gladys Dale's Drylawhill Trust; Wallace Land; Hallam Land Management; T G Tait & Sons; Sirius Sport & Leisure – no need for Countryside Around Towns policy; SDP does not allow for it; current policies are sufficient; such a policy would not prevent the potential for the granting of planning permission on greenfield sites in accord with SESplan Policy 7 and the requirements of SPP in circumstances where the Council is unable to maintain a 5 year effective housing land supply.

Persimmon Homes – Countryside Around Towns is an additional policy that is not needed and would overcomplicate an already policy heavy planning system.

Cardross Asset Management – achieving compliance with NPF3 and SESplan is more important; not based on objective assessment of land characteristics.

Clarendon Planning & Development Ltd. for Barratt David Wilson Homes, land at Preston Mains East Linton; Dr Slight, land at Ormiston – no available landscape or urban design analysis to justify

proposed areas; this is needed.

Colliers for Taylor Wimpey and Mactaggart and Mickel; inappropriate to include such a policy; queries long term implications of this policy; does not consider that Haddington has reached its environmental capacity for absorption of further well-designed residential development; policy is seen to be at odds with reasonable alternative dispersed growth option; suggests wiser to ensure strong and specific landscaping, planting and buffers are put in place as part of development schemes to appropriately protect areas; not all areas suggested merit or need protection ; policy duplication; designed landscape designation and proposed special landscape areas might also provide similar landscape protection.

Gladman advises that there is a good range of sites in this cluster. However, the Countryside Around Towns designation upon East Linton, in particular is overly restrictive.

Chalmers & Co.- Consider the suggested Countryside Around Towns policy to be another layer of bureaucracy as a restrictive tool rather than aspiring towards development that can be appropriate even for the most stunningly beautiful countryside.

Holder Planning for Mr A P Dale and MR R F Dale land at Port Seton links – disagrees with principle of Countryside Around Towns policy and with its suggested application to land at Port Seton; is contrary to the spirit of Scottish Planning Policy and other policies can provide an appropriate basis for directing development.

Support Neither Approach:

Whitehill Lodges - support neither approach suggesting it duplicates other policies and could constrain tourist proposals.

GKD Galbraith for Mr Lawson and Mr Wallace – supports the Countryside Around Towns policy but proposes that it does not include Seton Mains.

Montgomery Forgan Associates for Meadowhead Parks – does not dispute the principle of a Countryside Around Towns policy but queries the areas around North Berwick that have been suggested. Proposed policy should permit rural based businesses e.g. caravan parks to expand in a Countryside Around Towns area as long as they did not compromise the setting of the settlement.

Clarendon Planning for Barratt David Wilson Homes – policy requires further justification. Mitigation measures might be able to overcome landscape or settlement character impact. Needs clarification of the policy intention of DC1 and Countryside Around Towns.

Landowner at Dirleton for Foreshot Terrace site – existing policies and designations have guided development to appropriate locations; new policies are not required. Countryside Around Towns is essentially arbitrary, subjective and therefore discriminatory to landowners and could result in legal challenges.

APT Planning & Development for Cruden Homes; WJ Simpson & Son - supports the principle of identifying and protecting the best aspects of East Lothian's natural heritage though its relationship with DC1 needs better explained. It can create certainty around landscape designations and direct development to less sensitive locations.

Ryden on behalf of Wemyss and March Estates - support the suggested Countryside Around Towns

designations between Blindwells and Longniddry

Community Councils and local interest groups

Haddington Community Council – supports the proposed Countryside Around Towns policy but wish to see it extended to include the Clerkington site which would make a perfect green space area/future country park in the long term.

Ormiston Community Council - supports the preferred approach. Welcomes the proposed Countryside Around Towns area around the east end of Ormiston to preserve the historic planned form and rural setting of the village.

Cockenzie & Port Seton Community Council – supports the preferred approach. Countryside Around Towns policy will prevent coalescence of settlements and protect natural areas and productive agricultural land from development. Strong support for Seton West Mains land being included in a Countryside Around Towns area to prevent coalescence between Port Seton and Blindwells.

Dunbar Community Council - supports the preferred approach and the concept of protected landscapes around settlements. Suggests that these should permit sensitive/appropriate small scale development that does not unduly impact on the landscape, allow recreational routes and biodiversity corridors and be managed so they do not adversely impact the agricultural economy.

West Barns Community Council – supports the preferred approach; is concerned that West Barns does not lose its identity and wishes West Barns to be separate from Dunbar and Belhaven.

Humbie, East and West Saltoun and Bolton Community Council - supports the preferred approach; Countryside Around Towns policy will ensure distinct communities.

Dunpender Community Council - supports the preferred approach. This will protect settlements from over development.

North Berwick Community Council - strongly supports the preferred approach. The Countryside Around Towns policy would protect the environment around settlements and their individuality.

Pencaitland Community Council - supports the preferred approach and the Countryside Around Towns policy.

Gullane Area Community Council – strongly supports the preferred approach. Conservation of the rural setting is essential to protecting their character. Would prefer the proposed areas around Aberlady Gullane and Dirleton are extended with Drem also being included.

Prestonpans Community Council – supports the preferred approach but would also like to see protection for Morrison's Haven and the Greenhills areas.

Dunbar & East Linton Area Partnership – support the preferred approach. Important to maintain separation between West Barns and Dunbar. Need to protect/enhance green spaces, habitat and wildlife corridors and support active recreation. Suggest Countryside Around Towns should permit some development e.g. caravan parks.

Haddington and Lammermuir Area Partnership – supports the preferred approach.

Preston Seton Gosford Area Partnership – supports preferred approach. Countryside Around Towns policy should protect open spaces and prevent coalescence.

North Berwick Coastal Area Partnership – supports the preferred approach. Countryside Around Towns protection is needed. Would support further protection south and east of North Berwick and supports Countryside Around Towns as suggested in the Blindwells, Prestonpans, Cockenzie/Port Seton area.

Fa'side Area Partnership - supports the preferred approach and all the suggested sites for Countryside Around Towns designation. Suggests additional inclusion of land between Elphinstone and Tranent.

Sustaining Dunbar; Common Weal; Scottish Green Party - supports the preferred approach provided it allows community growing space, woodland and increased biodiversity.

Haddington and District Amenity Society – supports neither approach but consider that a Countryside Around Towns policy should provide a clear reference to the role landscape has in the setting of settlements and be more than just a buffer. Landscape is crucial to the setting of the area and is the key to protecting the character of East Lothian. Designated areas must include designed landscapes and policy woodland whether on the national inventory or not. Should consider detailed settlement strategies to allow these areas to form positive parts of towns.

Aberlady Conservation and History Society – supports preferred approach to protect Aberlady's rural special character and as a driver for continued tourism. Suggested Countryside Around Towns area at Aberlady is too limited.

Bolton Steading Resident's Association - supports the preferred approach and the areas it would cover.

The Coastal Regeneration Alliance - say that the preferred site for employment land between Prestonpans and Cockenzie would remove much of the countryside land between Prestonpans, Cockenzie and Tranent reducing amenity and leading to coalescence. They also say the same about land to the south of Cockenzie were that to be identified for development, though that land is not a preferred or reasonable alternative site and is suggested in the Main Issues Report to be designated as Countryside Around Towns.

Members of the public

A number of specific comments were in favour of additional areas to be included in a Countryside Around Towns policy including at Gullane, Dirleton, Drem, Aberlady, East Linton, Elphinstone, Stenton, Tranent, south of Longniddry, west of North Berwick and both east and west of Prestonpans – see table below.

Support the preferred approach to have a Countryside Around Towns policy (73) for the following reasons:

- East Lothian has high quality and character of landscape
- The historic environment including towns and villages needs protected
- Landscape character is very important to tourism and the local economy
- Places should not be spoiled by continuous development
- Towns and villages should retain their individual character and identity in the face of urban spread

- Need to prevent coalescence of settlements by maintaining green barriers between communities
- Villages are more likely to be adversely affected by new development on their edges
- Countryside around settlements is beneficial green space that helps a town to breathe, encourages access to the countryside with associated health benefits, is beneficial for flora, fauna and biodiversity generally
- Countryside Around Towns policy would give clear guidance to developers
- Include designed landscapes in Countryside Around Towns areas and potentially in appropriate conservation areas

Additionally, a letter from 52 residents from Aberlady also support the preferred strategy and suggest that the whole of the Bickerton field, a reasonable alternative housing site at Aberlady, be included in a Countryside Around Towns designation.

Support the reasonable alternative strategy (not to have a Countryside Around Towns policy) (7) for the following reasons:

- Policy DC1 protects this already
- Conservation Area designation sufficiently protects some proposed Countryside Around Towns areas
- Countryside Around Towns is an arbitrary, subjective policy discriminatory to landowners and which may result in legal challenges

Support neither approach (7) for the following reasons/comments:

- it is more important to protect such areas the closer you get to Edinburgh
- a Countryside Around Towns policy could put more pressure on land inside towns to their detriment
- Countryside Around Towns areas should be treated like conservation areas and include amenity space for paths and access to viewpoints and landscape features
- Countryside Around Towns policy would carry little weight when land is required for development in future
- Should be applied to green spaces and golf course but not arbitrarily to agricultural land

Additionally, 102 residents, in a pro-forma letter, stated that the preferred sites for employment land between Prestonpans and Cockenzie would remove much of the countryside land between Prestonpans, Cockenzie and Tranent reducing amenity and leading to coalescence. They also say the same about land to the south of Cockenzie were it to be allocated for development, though that land is neither a preferred or reasonable alternative site and is suggested in the Main Issues Report to be designated as Countryside Around Towns.

93 standard letters objecting to the Goshen Farm site expressed no specific comment in relation to question 8 but raised concerns that the development of that site would lead to urban sprawl and the coalescence of Musselburgh, Wallyford and Prestonpans depriving each of their separate identities.

KEY MESSAGES

- **Key agencies: Scottish Government and Historic Scotland recognise the role of a Countryside Around Towns policy that should work with Special Landscapes Area Designations, but also needs some further justification.**
- **National Interest Groups: The National Trust for Scotland and Scottish Wildlife Trust support a Countryside Around Towns policy and Homes for Scotland sees it as unnecessary. The Architectural Heritage Society for Scotland points out that landscape**

settings of settlements are central to the character of East Lothian.

- All the Community Councils and Area Partnerships who responded support a Countryside Around Towns policy to protect the character and identity of towns and villages and prevent coalescence. Of the other local interest groups, HADAS suggests that landscape is crucial to the setting of the area and is the key to protecting the character of East Lothian.
- The overwhelming majority of local residents and members of the public support a Countryside Around Towns policy which they see as protecting the countryside settings, character and identity of towns and villages and providing green space opportunities.
- The majority of developers, landowners and agents who expressed a view are opposed to the introduction of a Countryside Around Towns policy which is seen as unnecessary, does not plan for the longer term, is insufficiently justified, and seen as a barrier to maintaining an effective 5 year housing land supply.
- The tables below indicate views of members of the public in relation to particular locations.

Secondary school cluster area: Musselburgh

MIR reference if applicable	Location	Support	Object	No opinion

Secondary school cluster area: Preston Lodge

MIR reference if applicable	Location	Support	Object	No opinion
ALT-P2	Land south of Longniddry	1		
	Prestonpans, Greenhills Morrison's Haven	3		
PREF-P1	Land between Prestonpans and Cockenzie	2		
	Land between Longniddry and Port Seton	1		
	South of Seton House and around St Germain's	2		
	Seton Mains		1	
PM/PP/HSG097	Seton West Mains	1		
	Cockenzie coal store		1	

Secondary school cluster area: Ross High

MIR reference if applicable	Location	Support	Object	No opinion
	Ormiston	4		
	Tranent	3		

Secondary school cluster area: Haddington

MIR reference if applicable	Location	Support	Object	No opinion
	Land to south of Letham House		1	
	Land at Clerkington, Haddington	3		

Secondary school cluster area: Dunbar				
MIR reference if applicable	Location	Support	Object	No opinion
	Belhaven/West Barns	3	2	
	East Linton, land at Smeaton	1		
	East Linton	4		

Secondary school cluster area: North Berwick				
MIR reference if applicable	Location	Support	Object	No opinion
	Muirfield Golf Course	1	3	
PREF-N8	Gullane, Saltcoats	1		
	North Berwick, Law and land to the south and east	3		
	Dirleton, land to north	1		
	North Berwick, land to the west	1		
	Aberlady	3		
ALT-N10	Aberlady – include the Bickerton field in CAT area	52		
	Dirleton	3		
	Gullane	4		

Issue: Central Scotland Green Network	MIR question: Question 9
Total number of responses on issue	108
Support for preferred approach	85
Support for alternative approach	3
Support for neither approach	11
<p data-bbox="188 508 667 539">Scottish Government and key agencies</p> <p data-bbox="188 577 1401 786"><u>Scottish Ministers</u> support the preferred approach. The Council should consider adding a reference to the Green Network to the Objectives. Scottish Ministers point out examples of good practice, including Supplementary Guidance by Perth and Kinross and Fife Councils. They will expect the Local Development Plan Action Programme to provide detail on how the Central Scotland Green Network (CSGN) elements in East Lothian will be delivered. They note that Green Networks should ensure each of Scottish Planning Policy's requirements are met including:</p> <ul data-bbox="240 824 1378 1070" style="list-style-type: none"> • Identifying and protecting open space, enhancing and promoting green networks, • Identifying sites for new indoor or outdoor sports, recreation or play facilities • Safeguarding existing and potential allotment sites to ensure the local authority's statutory duty on allotments is met • Safeguarding access rights and core paths • Encouraging new and enhanced opportunities for access linked to wider networks • Encouraging temporary greening <p data-bbox="188 1115 1401 1391"><u>Scottish Environment Protection Agency</u> supports the preferred approach. Supplementary Guidance would identify opportunities to integrate with other policies and strategies including River Basin Management Planning, while its lack could limit the potential for the CSGN to provide enhancements to the environment or mitigation for negative impacts. For new developments, SEPA requests buffer strips between built development and waterbodies and morphological improvements to help achieve good ecological status of the water environment. Supplementary Guidance could expand good practice around the water environment policy including encouraging the multiple benefits provided by green networks.</p> <p data-bbox="188 1435 1401 1532"><u>Scottish Natural Heritage</u> supports the preferred approach though considers it would benefit from updating and refinement. It considers the Supplementary Guidance should cover the following main sections:</p> <ul data-bbox="240 1576 1394 1720" style="list-style-type: none"> • Identify the existing Green Network assets which should be safeguarded • Identify local green network priorities and opportunities at site level as part of clearly stated site requirements in site briefs • Set out design standards for green infrastructure in new developments. <p data-bbox="188 1765 1401 2033">In particular, SNH raise concerns that there is potential for poorly coordinated development to occur in the South East Edinburgh Strategic Development Area. Collaboration between adjacent planning authorities is needed. Settlement growth brings opportunities to deliver strategic active travel routes including a 'cycle superhighway' connecting the main existing and proposed settlements with Edinburgh. These should be identified in the development plan as new transport infrastructure. Developer contributions should be sought for strategic active travel routes as well as other components of East Lothian's built and natural capital. Strategic design frameworks for areas of large scale change, settlement profiles and vision statements for existing settlements, and site</p>	

development briefs for each of the allocations would help achieve this.

Forestry Commission Scotland do not state whether they support the preferred approach however they have checked each site against a range of woodland sensitivities. They identify areas and sites where development could have an adverse impact on existing valued trees in particular ancient woodland, both where mitigation might be needed and where this is unlikely to be possible. They have identified opportunities for woodland creation to provide Green Network benefits.

Sports Scotland supports the preferred approach, stating Supplementary Guidance could be of benefit in promoting and protecting opportunities for active travel and outdoor sport, in detail inappropriate for the LDP.

Scottish Water supports the preferred approach. The Supplementary Guidance should include a design-led approach to green infrastructure provision. This should consider the use of green space for surface water management in conjunction with other uses.

Midlothian Council supports the preferred approach. Midlothian Council wishes to work with East Lothian Council to help ensure there are good cross border green network connections between the two local authorities. In this context, as well as along the East Lothian and Midlothian border, it wants to work to enhance cross border green network connections between East Lothian, Midlothian and the City of Edinburgh Council in the south east Edinburgh and Shawfair areas.

ELC Landscape and Countryside supports the preferred approach. Developers need to know what is expected of them within and around individual development sites, which is not provided by a general strategy plan. The population expansion in some areas is also considerable and the LDP needs to show wider public gains through the planning process. A strategically important element of the Green Network is East Lothian's coast, the most accessible coastline for the whole of Central Scotland. There is a need to balance ensuring visitors have a high quality experience with protecting the nature conservation interest of the coast.

National interest groups

Homes for Scotland had no comment.

Architectural Heritage Society of Scotland supports the preferred approach. Priorities were extending the Green Network to local paths within settlements. The Green Network should be used to link green corridors, and non-vehicular routes adjacent settlements, and fitted into access to the coast provision. Green Networks should be seen as the pedestrian's natural mode of travel.

Royal Society for Protection of Birds supports the preferred approach. A Green Network priority should be biodiversity value and potential, with the network being for wildlife as well as people. It should link isolated habitats allowing connectivity and dispersal. Paths should include as much "natural" habitat as possible. Planting should be of native species only and grassy areas should not be heavily managed. Paths should avoid ecologically sensitive sites and waterbodies. Opportunities should be taken for riparian planting along waterbodies. Water bodies in poor ecological condition should be identified and treated. They mention the Peffer and Eil Burns in particular.

The Scottish Wildlife Trust supports the preferred approach, and encourages a timetable for its production. We would like to see some timetable commitments to producing the guidance. An updated Biodiversity Action Plan should complement and support the Supplementary Guidance.

National Trust for Scotland supported the preferred approach. They note they would be happy to provide guidance and promote opportunities for greater enjoyment of and access to good quality greenspace. Their priorities for the area were that any proposals approved for the NPF3 plan for Cockenzie Energy Park address the potential interruption of the John Muir Way. They would like to see habitat networks and corridors embraced within the local development plan.

Landowners, developers and agents

Mostly, landowners and developers supported the preferred approach, some noting that Supplementary Guidance was of a scale better suited to the task than a general strategy. Many voiced concern that the Green Network should not constrain development, and several made comments on how their site could contribute to Green Network objectives. Some raised the question of how this would be linked to Green Belt and Countryside Around Town policies. Some developers expressed concern that their site may form part of the Green Network and therefore they thought it would be precluded from development. None of the respondents referred to the CSGN's status as a National Development, though a few did reference Scottish Planning Policy.

Supporting the Preferred Approach were:

Wemyss and March Estate state the priority should be to expand the existing walking network and improve linkages and connectivity between routes and amongst user groups. Financial resources should be adequate to maintain access.

Cardross Asset Management Limited state that Supplementary guidance should provide for flexibility in delivery of the Green Network - for example local diversions of the John Muir Way may be required to ensure delivery of masterplans of major sites.

CALA Land Management Limited comment specifically on the area around Drem, that Drem has the ability to contribute to the principles and implementation of the CSGN with the creation of linkages from Drem to the coastal towns and villages as well providing a range of green spaces alongside a nature/green corridor along the route of the Peffer Burn valley as this creates the northern boundary of the expansion area to the north.

Rick Finc Associates on behalf of the landowners of the site they term 4FD [to south of Letham House, Haddington] note that the Green Network Strategy, as illustrated in the MIR, has not been proven as being justified or indeed deliverable. The creation and enhancement of a usable network can only be facilitated by development, and through Supplementary Guidance. On their site at Letham Mains and the surrounding area, they comment that the area is shown as an Indicative Green Network Opportunity, associated with the existing Core Path running east to west. Inclusion of their site will allow the extension, enhancement and promotion of a significant green network through the new expansion area at Letham Mains, Haddington, as well as enhancing the Core Path and green network to the west of Haddington.

Rick Finc on behalf of Hallam Land Management Ltd (Dolphingstone Farm site) support the preferred approach given that the implementation of the CSGN would be mainly through development of sites. A general strategy is acceptable as there is flexibility and implementation could work in tandem with built development, but it is difficult to see how it can be implemented without Supplementary Guidance where green network opportunities are identified. Supplementary Guidance is the most practical way of taking a balanced view and delivering social economic and environmental benefits for the area. On the site at Dolphingstone, they comment that the CSGN strategic opportunities for East Lothian do not include this site, and that any Green Network here

would act as a potentially unnecessary constraint to sustainable housing development. The MIR Green Network plan (page 68) is unclear but would not appear to offer any obvious green network opportunities given the nature of proposals in this area. It is not clear how Dolphingstone Farm can be connected to a network or how it can complement the Green Belt or any potential CAT designations. Nor is it clear how connections with countryside and coastal habitats and communities, character and appearance can benefit, particularly given the neighbouring large scale preferred allocation at Goshen Farm.

Rick Fink on behalf of MJ and V Rennie Trust (interest in Sherriff Fields, West Barns) supports neither approach. The choice between approaches is based on a strategy (MIR page 68) which is not proven as justified or deliverable. It is inconceivable that many of these locations would be progressed without Supplementary Guidance. For their site at Sherriff Fields, the MIR identifies a Green Network Opportunity to the west of West Barns encompassing this. Any greening of this area will need to be undertaken by co-operation and facilitated through development. This site could contribute to the Green Network. They do not oppose inclusion of this area as long as it does not constrain the development potential of the area.

Scott Hobbs Planning on behalf of Ashfield Land (Goshen site interest), and Queen Margaret University consider Green Network enhancement opportunities should be shown for each of the allocated sites in cluster areas. The general diagram approach (similar to the one in the MIR page 68) provides a useful overview, however the scale is inappropriate to show the benefits associated with some of the larger scale allocations in and around Musselburgh. Scott Hobbs Planning make further comments specific to the Goshen site later in their response, in particular that woodland planting along the B1361 would maintain the character of this route; that long views to Arthur's Seat would not be compromised; and that accessible open space would be created.

APT Planning & Development Ltd on behalf of Cruden Homes (East) Ltd comment on the Amisfield site that it has the ability to contribute to the principles and implementation of the CSGN with the creation of improved linkages along the River Tyne as well as creating green edges and corridors throughout the site encouraging east-west and north-south movement on foot/by bicycle.

Turley on behalf of Hargreaves supports the preferred approach where guidance seeks to protect environmentally sensitive designations and locations. Any supplementary guidance should identify circumstances where it is appropriate for development to take place, taking into account associated significant social or economic benefits.

Colliers on behalf of Taylor Wimpey and Mactaggart and Mickel note policy in SPP, and conclude that integration between design and CSGN policies is key for the emerging Plan. The areas shown in the MIR (page 68) largely reflect the Core Path network, which is supported, as therefore is the CSGN. They support the inclusion of biodiversity networks and areas however care should be taken that this does not constrain development. It must be acknowledged that there will be considerable overlap between the policies of Green Belt, Countryside Around Towns and this designation, if all come to fruition as proposed. Full explanation as to the role and mechanism for each must be clearly set out in the LDP. The 'multifunctional' nature of the network should be explored through the early design process and during the application process itself, where required. There are innovative and sensitive ways in which to integrate and such networks and exploration of such should take place at an early stage in site designation or application. In addition it is paramount that flexibility is in-built into such designations to ensure the 'one size fits all' approach is not implemented. The Council must remain flexible and seek early engagement at all times.

Persimmon Homes support the preferred approach but make no further comment.

Supporting neither approach, or making no answer were:

Whitehall Lodges (site at Wallyford) support neither approach, saying that it is not clear how the Green Network relates to Green Belt and Countryside Around Town Proposals, and see no difference between the approaches in this respect. For their site, they don't see the difference between the preferred strategy and the reasonable alternative. Their site appears to be identified as a Green Network Opportunity: however it is neither green nor part of a network. They will be bringing landscape and planting proposals forward.

Barton Wilmore on behalf of developer PREF-N5 at Gullane did not state a preference for approach, but noted that the preferred approach is to protect existing features that contribute to CSGN objectives and seek to make connections between them, including in development sites. They are not opposed to their site connecting to wider CSGN objectives. Draft proposals for their site include enhancing links between it and the surrounding area, to enhance recreational opportunities and aid movement of people and wildlife; the draft proposals also support enhancing green infrastructure.

George F White LLP on behalf of Mr D Lockie and on behalf of Mr M Steven they do not express a preference stating they would need further information on specific proposals before commenting.

Chalmers and Co did not state a preference on approach but commented that the ideas for connectivity are sound and ideally would be practiced by neighbouring farmers in any case. There should be room within EU agricultural policies to reward cooperation and penalise where this does not occur. It does however seem to be meddling in rural affairs and be a policy that will cost farmers. Respect for local landowners will be paramount.

Community Councils and local interest groups

There seems to be general support for a green network (though this was not the question asked) with different groups mentioning different aspects as important, including movement of people and wildlife, replanting of storm damaged trees, management and protection of existing habitat including waterways, avoiding coalescence of communities, green space and others. Some groups prioritised the need to protect specific areas such as the 'Green Hills', the John Muir Way or North Berwick Law. Supporting the preferred approach were:

Aberlady Conservation and History Society; they did not see a need for a Green Network within the eastern part of the county if it remained predominantly countryside.

Association of East Lothian Day Centres supported the preferred approach and saw considerable potential for expanding this network in the areas of East Fortune, Athelstaneford, Fenton Barns, Drem and towards Aberlady.

Cockenzie and Port Seton Community Council are in favour of greater guidance and a strategy which supports the safe, easy movement of people and wildlife between different areas in East Lothian. As a priority, they would like to see storm damaged or any spaces or gaps in existing woodland or tree and hedgerow lines replanted to aid safe passage for wildlife between natural areas. They would support a re-forestation policy in suitable locations.

Commonweal Dunbar, Sustaining Dunbar and Scottish Green Party – East Lothian would like to see new green corridors linking with existing networks, with management of existing habitat networks including waterways affected by agricultural run-off. Some wildlife areas need to be protected from

human activity and this should be recognised.

Dirleton Village Association and Gullane Area Community Council consider Supplementary Guidance would help promote understanding of the Green Network. This would also help strengthen the case for avoiding coalescence of communities such as Gullane and Dirleton with ones nearby.

Dunpender Community Council prioritise the preservation of the John Muir Way for all time to come, and would also like to see footpath maintenance taken on by the local authority.

Haddington and District Amenity Society considers that supplementary guidance is important, and that is critical in defining the balance between development areas/ recreation areas and the setting of the surrounding countryside. It should align with Countryside around Towns, coastal and countryside policy and be defined at local town and village level as well as detailed as a county-wide proposal. Defining the location of and access to the green network will help to define changes to towns, villages and urban areas.

Humbie, East and West Saltoun, Bolton Community Council and Bolton Steading Residents Association state that green spaces are important for communities, provide space for wildlife and enhance the appearance of a town or village.

Musselburgh Parish Grouping of the Church of Scotland support the preferred approach but did not comment further.

North Berwick Community Council noted that In the North Berwick area this could protect the Law, the coastline, John Muir way, cycle paths wooded areas in the glen contributing to a healthier safer lifestyle.

Prestonpans Community Council gives as the priority for Prestonpans, the protection of areas such as “the Greenhills” and Morrison’s Haven from unnecessary development.

No group stated they supported the reasonable alternative. Groups stating they supported neither approach, were:

Fisherrow Waterfront Group and Eskmuthe Rowing support the identification of Fisherrow and the coast at Musselburgh as a 'green network opportunity' which implies that the coast here should be landscaped better. It would be helpful, however, if this could point out that the coast will have to play a number of roles. Competing interests in the coast – habitat regeneration, flood protection, recreational opportunities, regeneration and economic development potential – should all have their place. The plan should make clear how a balance will be struck between these competing objectives in order to secure a sustainable future for Fisherrow, and Musselburgh as a whole. FWG add that the links through Fisherrow do not connect well with City of Edinburgh and the wider strategic Scotland-wide network. Strengthening these links should be a priority at this gateway.

Ormiston Community Council state they greatly value the green spaces, woodlands, rivers and pathways around Ormiston that connect to other settlements and rural areas. Through the Central Scotland Green Network we would like to see on-going or greater protection and enhancement of these important countryside assets.

Old Craighall Residents and Tenants Association and state that all Green belt areas must be preserved.

Members of the public

The majority of respondents supported the Preferred approach. Many of the reasons given were in support of the idea of the Green Network itself, for which there was support. For example:

“A network of open green spaces, woods and undeveloped land is ideal. A green lung for the country that provides recreation opportunities that may have economic benefit locally”. Other reasons along these lines were the desirability of amenity green space, biodiversity links and the preservation of the countryside.

Reasons given for supporting the production of Supplementary Guidance were that:

- detailed plans are needed to balance detailed plans for housing and economic development;
- it's important to have a long term vision;
- it gives the best chance of preserving the landscape and countryside including woodland;
- developers will be obliged to provide biodiversity areas and active travel routes;
- Integrating policy across different sectors and areas is sensible and alignment with the Local Biodiversity Plan mentioned in particular;
- a sensible way of promoting the sustainable use and enjoyment of the countryside and coast;
- It would explain the CSGN and allow East Lothian to develop a strategy distinct from other areas of the central belt;
- The Green Network should be defined at a community level as each settlement is likely to have specific requirements;
- The respondent supports a short, action orientated strategy and would like to see commitment to implementation;
- The green network requires a lot of work and investment. The value of this will be significantly increased if opportunities for cooperation and future development are actively pursued;

A small number of respondents preferred the reasonable alternative, with the only explanation being that it 'seems to go far enough'.

The minority of respondent preferred neither approach. The reasons given were that Green Network should not just be a tool to alleviate the problems that will come from the compact strategy; that green issues should be much further up the priority of the Local Development Plan than this.

Priorities for the Green Network are summarised as:

- **Active Travel** was the most common theme, with several respondents prioritising safe, active travel routes between communities and through all new development linking to schools, public transport, town centres, and coastal and woodland areas, and other public assets. Provision of safe places to lock bikes in town centres was suggested. Developer funding for paths within development was important, as was maintaining existing countryside pathways and bridleways. Upgrading of paths for those with mobility difficulties was one respondent's priority. Existing routes that were priorities for one or more respondent were the John Muir Way (noted in regard to Cockenzie Power Station area in particular) and the Tyne walkways while new routes/connections were requested between Haddington and Gifford, from Gullane to Drem and a safe crossing of the A1. Another asked for consideration of horse riding trails, resolving potential clashes with cyclists and pedestrians. One respondent stressed the multi-functional purpose of paths, as places to “go to and just hear birdsong and the wind in the trees”.

- Sufficient **recreational space** and family space was seen as a priority, for example between large areas of housing. A number of respondents stressed keeping the green fields between Cockenzie and Port Seton for community use, one adding the shore and the Battle of Prestonpans site.
- Protection of existing **biodiversity** was seen as important, with one respondent suggesting a buffer zone around the areas of countryside with the greatest biodiversity. Woodland protection and creation was seen as a priority. Improving conditions for pollinators was also mentioned. Management of sand dunes was also mentioned.
- **Landscape** issues were not mentioned by many respondents, however the identity of villages and the need to protect their envelopes was mentioned, as was the protection of river valleys and the views of woodland around Gosford House.
- **Tourism** was a priority for several respondents, with improvement of paths and cycle paths for tourists both mentioned, as was promotion of the coast in particular. This should be protected to maintain tourism.
- Loss of **agricultural land** to development was a concern. Loss of topsoil due to winds was mentioned and the encouragement of shelter belts which would also benefit wildlife was suggested.
- **Protection of green areas** generally was also mentioned. The need to provide a good green network to compensate for land lost to development was mentioned.

KEY MESSAGES

- **General acknowledgement that it is a national policy and so needs to be followed;**
- **There is general support and indeed from some members of the public and community groups, enthusiasm, for the Green Network concept;**
- **Support for a long terms vision for the Green Network in the area to improve amenity for residents and visitors, and that without this there is a danger of a piecemeal approach;**
- **The Green Network should protect key assets and seek new opportunities and there is a need to balance protection of biodiversity with access and recreation.**
- **The capacity of the Green Network to deliver multiple benefits is important - different priorities were mentioned including active travel, recreational space, biodiversity and landscape improvement;**
- **CSGN can integrate with other plans, policies and strategies, including providing multi-functional benefits, such as;**
 - **Biodiversity Action Plan;**
 - **River Basin Management Planning / water framework directive / flooding / surface water management;**
 - **Other policies of the LDP - GB / CAT etc;**
 - **Support for tourism, recreation and open space objectives;**
 - **Transport initiatives, including active travel for leisure and commuting;**
 - **By virtue of the above contribute to reducing traffic congestion and pollution;**

- There is a need to consider the EL wide strategy, but detailed policy should be set out in SG. This would specify the actions that are intended on the ground, and provide clarity to the public, investors and developers alike, including funding options;
- Developer contributions should be sought for delivery as planning obligations, although some developers stressed that beneficial development should not be unnecessarily restricted;
- It is recognised that the role of strategic / larger sites in helping to facilitate CSGN objectives could be significant;
- The LDP Action Programme should play a key role in setting out where CSGN objectives should be delivered and by whom;
- In particular, SNH raise concerns that there is potential for poorly coordinated development to occur in the South East Edinburgh Strategic Development Area;
- MLC want to work together jointly on considering opportunities to secure cross-boundary strategy and benefits;
- A design led approach should be followed, where CSGN objectives are considered as part of plan making, design briefs, master planning and applications etc;
- Some concern this will result in some dis-benefit to the rural economy and farmers particularly (see also comments on CAT);
- The role of the coast, and the demand for access to it, needs to feature as a key consideration for the CSGN in East Lothian going forward;
- Some expressed the view that it should be used as a policy tool to protect further harmful human intervention in the landscape;
- Noted that a significant amount of work, leadership and investment will be needed to deliver it, but that the benefits will outweigh the costs;
- Short timescale targeted actions should be identified with a commitment to implementation;
- Although a number of specific projects were suggested, and these are identified in the tables below, many respondents made reference to only one project.

Musselburgh
Issue/area
SNH: concerns that PREF-M1 Craighall could lead to fragmentation of existing green infrastructure assets and poorly planned access and active travel provision.
Keeping the John Muir Way open
Infrastructure improvements to promote alternative travel options
Build on network of walking/access routes.
Protection of river valleys especially the Esk
Providing safe walking and cycling routes through and around the town including safe places to lock bikes in public places.
Fisherrow Waterfront Group state that strengthening the links through Fisherrow to connect well with City of Edinburgh and the wider strategic Scotland-wide network should be a priority.

Tranent
Issue/area
Maintain, extend and improve the Tyne walkways.
Blindwells is still capable of being productive of food and that should remain its purpose.
Ormiston Community Council state they greatly value the green spaces, woodlands, rivers and pathways around Ormiston that connect to other settlements and rural areas

Prestonpans
Issue/area
Keeping the John Muir Way open
Keeping the green fields between Cockenzie and Port Seton and ensuring they connect with other green sites
The Battle of Prestonpans site, should be protected and utilised for the benefit of communities
Promotion of visitors & tourists to the coastal villages area
Prestonpans Community Council mention protecting the Green Hills and Morrison's Haven from unnecessary development.

Haddington
Issue/area
Maintain, extend and improve the Tyne walkways.
Establish a cross country walk between Haddington and Gifford.
Around Haddington the designed landscapes (and the features that are integral to them, the river corridors, walled gardens and policy woodlands, and the Garleton Hills) should all form the framework for the green network and Countryside Around Town policy.

Dunbar
Issue/area
Keeping the John Muir Way open
Maintain, extend and improve the Tyne walkways.

North Berwick
Issue/area
Keeping the John Muir Way open
Protect the views of the woodland around Gosford House from further development
Promotion of visitors & tourists to the coastal villages area
Dirleton Village Association and Gullane Community Council wish to avoid coalescence.
RSPB seek riparian planting along the Peffer Burn and restoration at the Eil Burn at Dirleton.

Issue: Development in the Countryside and Coast	MIR question: Question 10
Total number of responses on issue	169
Support for preferred approach	63
Support for alternative approach	37
Support for neither approach	42
<p>Scottish Government, key agencies, and adjoining authorities</p> <p><u>Scottish Government</u> – the preferred approach should also make reference to the need to protect prime quality agricultural land or land of lesser quality that is locally important. Seeks clarity on whether the whole of East Lothian can be described as accessible and pressurised. If not, a differing approach to rural development, including housing, depending on the degree of pressure apparent might be taken. Seeks clarification on the extent of areas of the countryside with easy accessibility to the city and clarification whether it is these areas of the countryside only that the preferred approach will apply to. Notes that where a Planning Authority is satisfied that an adequate case has been made for a house in the countryside it should not be necessary to use formal mechanisms to restrict occupancy; this should be reflected in Proposed Plan policy.</p> <p><u>Scottish Natural Heritage</u> – a strict approach to achieving siting and design which is in accordance with existing development patterns and local landscape character is needed. Appropriate development guidance, strategic design networks and site briefs would help address potential issues through development in the countryside and on the coast. Unspoiled coast must be identified and defined. Recommend that background papers supporting the Proposed Plan clearly establish the criteria for identifying unspoiled coast areas and that consideration of vulnerability to coastal erosion and flooding is included for the entire coast.</p> <p><u>SEPA</u> – consider that greater emphasis is needed on the avoidance of increased flood risk on the coast and in the countryside. Generally supports the preferred approach but with the addition (in capitals) to the following statement: "LDP proposals map should define significantly constrained coastal areas and those parts of the coast which are unspoiled OR AT RISK OF FLOODING."</p> <p><u>Network Rail</u> – supports the preferred approach. This section should make clear that in some cases, protection and enhancement of existing infrastructure may be contemplated within the coastal environment.</p> <p><u>Scottish Enterprise, submitted by Scott Hobbs Planning</u> - supports neither approach which are inconsistent with NPF3 which identifies the Forth Coast from Cockenzie to the Torness area as a potential energy hub and area of co-ordinated action, to which no reference is made within the Main Issues Report and which covers a substantial area currently designated as undeveloped countryside and open coast. Need to protect natural resources of coast and countryside must be balanced with role of the coast and countryside in delivering essential infrastructure developments.</p> <p><u>East Lothian Council Landscape & Countryside</u> – supports the preferred approach to maintain current policy approach to development in the countryside and coast. Suggests insufficient recognition of the importance of the East Lothian coast which is the busiest coast in Scotland attracting 3 million visits p.a. The coast is a key component of the East Lothian Tourism Strategy. Few parts of the coast are not covered by natural heritage designations. Although parts of the coast will be protected by individual policies much stronger protection of the coast is needed and in particular that which recognises and is applied to the coast as one entity. Residential developments</p>	

on the coast have had negative impacts on the quieter refuge areas for wildlife and the wilderness for people. Queries whether supplementary guidance is required for the coast. Notes that Levenhall Links and the NW Quarry at Dunbar will be important as visitor attractions in future.

National interest groups

National Trust for Scotland – supports the preferred approach. Strongly backs the objective to maintain and enhance the character and appearance of the countryside and the presumption against development in areas of unspoilt coast. Note their conservation agreements in place on the coastline around Longniddry and North Berwick as signaling their intention to help protect the East Lothian coastline.

Scottish Wildlife Trust – supports the preferred approach to development in the countryside. In particular we would like to see the definition of ‘significantly constrained coastal areas’ on the LDP map and a presumption against development in those areas and areas defined as ‘unspoiled’.

Sport Scotland - suggest that the recreational purpose of regional and country parks is recognised in development plans and appropriate policy developed to protect and promote them.

RSPB - support the presumption against development that would lead to the loss of “rare or carbon-rich soils”. Care should be taken to avoid increasing disturbance levels by improving access to important and sensitive coastal areas, notably Aberlady Bay. The car park here should be retained in its present size and not expanded. Paths should avoid the water’s edge where birds are feeding and roosting, and salt marsh and other sensitive vegetation types.

Homes for Scotland – support the reasonable alternative which makes important provision for replacement dwellings (though the circumstance in which these would be allowed are markedly limited) and for very small scale affordable housing projects. Considers there may be scope for greater allowances still – without undermining the ambition to maintain the character of the open countryside and unspoilt coast. The replacement of existing buildings and the construction of new ones can, with high standards of design and architecture, lift the character and appearance of an area and remove ‘blots’.

Architectural Heritage Society of Scotland – supports neither approach. Should be a separate more restrictive protection of the coast and a more subtle and detailed control policy in the Countryside. Specific rural objectives should be proposed, such as extension of broadband, the provision of affordable housing physically adjoining existing groups of rural buildings (with limits to numbers within time periods). These more flexible policies should not apply in the Coastal Area.

Landowners, developers and agents

Support for Preferred Approach: 4

Support for Reasonable Alternative Approach: 4 (of these 4 gave no preference; none supported either option a or option b only and 3 supported option a and b together)

Support for Neither approach: 25

Ironside Farrar in support of a site at Limekiln East Saltoun – supports reasonable alternative with an additional exception (c) to allow brownfield land in the countryside to be brought back to productive use as they make little contribution to productive agricultural use and are of low habitat value.

Landowner at Dirleton - Affordable housing in the countryside is needed and its provision should be

promoted. Like-for-like replacement of prior-existing housing should be permitted but should not create large-scale building or contentious development.

Montagu Evans LLP for site at Athelstaneford - supports neither approach. Should be more flexibility to permit small scale greenfield housing sites in the countryside, especially if in the strategic development area and positively contribute towards the rural settlement they are adjacent to.

Whitehill Lodges – supports neither approach. Existing policy DC1 is overly restrictive and should be extended to include tourist development.

Bourne Leisure – supports neither approach but acknowledges that the strength of the tourism industry is in part dependent on the protection of the countryside and unspoiled coast. Policy must take a well-balanced and careful approach, in terms of protecting and enhancing the countryside and coast, while at the same time ensuring that appropriate and attractive tourist accommodation can be provided or enhanced, to promote local and wider economic growth and well-being.

Rick Finc Associates for landowners of site they term 4FD - supports the preferred approach, the alternative approach adds very little value and is only likely to be of use in exceptional circumstances. Disagrees that “windfall proposals for development of housing on greenfield land ... should normally be resisted” (para 5.88) which is contrary to SDP Policy 7 which permits greenfield development both within and outwith SDAs, subject to criteria 7 a-c being satisfied.

Montgomery Forgan Associates for Meadowhead Parks – supports neither approach. Supports the ‘Charter for Appropriate Rural Development’.

Inch Cape Offshore Limited – supports the proposal to generally maintain the current policy approach to development in the countryside and undeveloped coast, subject to due consideration of future areas to be designated as ‘unspoiled coast’ where there would be a general presumption against development.

Scott Hobbs Planning for Neart na Gaoithe Offshore Wind Limited and Firth; Tay Offshore Wind Developers Group - supports neither approach which are inconsistent with NPF3 which identifies the Forth Coast from Cockenzie to the Torness area as a potential energy hub and area of co-ordinated action, to which no reference is made within the Main Issues Report and which covers a substantial area currently designated as undeveloped countryside and open coast. Need to protect natural resources of coast and countryside must be balanced with role of the coast and countryside in delivering essential infrastructure developments.

Scott Hobbs Planning for SP Energy Networks – supports neither approach. Policy for undeveloped coast and countryside must take account of the area’s significance as recognised by NPF3 (including in particular high voltage transmission network development required to ensure the ongoing security of supply) otherwise it is inconsistent with NPF3. Policy should include a specific exception for development referenced within a National Planning Framework. Given projected associated development activity in East Lothian and the extent of the open countryside policy designation, it is highly likely that there will at some point be conflict between the two policies.

Geddes Consulting for Hamilton & Kinneil Estates; Wallace Land and The Sir John Hope Executry; Wallace Land and Gladys Dale’s Drylawhill Trust; Wallace land; Hallam Land; Sirius Sport & Leisure – supports neither approach. Considers Policy DC1 should be reviewed and be more flexible to comply with the requirements of SPP paragraphs 74-83, reflecting the overarching aim of supporting diversification and the growth of the rural economy and encourage rural development that supports

prosperous and sustainable communities and businesses whilst protecting and enhancing environmental quality.

Geddes Consulting for T G Tait & Sons – supports the preferred approach but considers Policy DC1 should be reviewed and be more flexible to comply with the requirements of SPP paragraphs 74-83, reflecting the overarching aim of supporting diversification and the growth of the rural economy and encourage rural development that supports prosperous and sustainable communities and businesses whilst protecting and enhancing environmental quality.

Persimmon Homes - supports neither approach. Given the state of land supply in East Lothian and the requirement to deliver a significant number of houses over the Plan period, policies like this will significantly constrain development potential and units.

Cardross Asset Management Ltd. – supports neither approach. Because of the acute shortage of housing & employment sites proposed development on the coast or in the countryside, where spine roads and settlements are located, should not be ruled out.

PPCA Ltd. for The Leadhills Trust – supports neither approach. Considers that the preferred option that maintains the current policy approach is overly restrictive, out of date and contrary to National Planning Policy Framework 3, Scottish Planning Policy and Strategic Development Plan that collectively and consistently, expect a pro-active response to new development in the countryside. It does not allow the full potential of the Council rural area to be reached and it does not favour sustainable development. Considers the reasonable alternative does not go far enough. Suggests that where there are existing groupings of three to eight dwellings in the countryside these be allowed to expand by a further two dwellings within one Local Development Plan period up to a maximum of ten dwellings. The new dwellings should be well located in relation to the existing dwellings to help maintain local services and support local communities without risking over development in rural areas. Traditional rural structures (either existing or with photographic/historical evidence) no longer fit for human habitation should be permitted to be replaced with a new structure of equivalent scale, positioning and design. The test in DC1 that allows for a temporary planning permission for accommodation associated with an emerging business or agricultural use should be removed. New businesses should be acceptable without caveat. Small scale should be defined and subject to environmental controls on siting, design and material.

Clarendon Planning for Barratt David Wilson Homes for land at Limeylands Ormiston – supports neither option. Considers that amendment is required to make allowance for ‘medium’ scale housing (private and affordable) where this meets suitable criteria, i.e. in accordance with the content of SESplan Policy 7 which refers to impact on settlement/local character and infrastructure requirements.

Clarendon Planning for Barratt David Wilson Homes for land at East Linton – supports neither approach. Considers that neither the proposed Countryside nor Countryside Around Towns policies should create artificial barriers to the implementation of SESplan Policy 7 which refers to impact on settlement/local character and infrastructure requirements.

Clarendon Planning for landowner at Hillview Road Ormiston – supports neither option. The MIR is technically incorrect to state that “SDP Policy 7 allows the LDP to make small scale allocations for housing development on greenfield land within and outwith the SDA”. Notes the attempt to introduce a degree of flexibility and opportunities for small-scale housing which can offer community benefits should be capable of being assessed without recourse to strategic justification.

Landowner at Broxburn – supports the reasonable alternative options a and b.

Smiths Gore – supports neither option. Suggests the preferred option does not comply with National Planning Framework 3 or Scottish Planning Policy and that the whole East Lothian countryside should not be categorised in the same way. Suggests a range of ways in which the East Lothian countryside should be opened up to development through revised policy and supplementary guidance including permitting small building groups, low density housing, less restrictive conversion policies, replacement dwellings.

Nick Wright Planning for the Winton Estate – supports neither approach. Disappointed that the MIR does not propose any change to the countryside policies and does not respond to suggested amendments to the policy proposed rural businesses, landowners and community stakeholders in pre-MIR rural engagement. Suggests that the policy should be an integrated rural planning policy releases economic potential, enables sustainable communities and conserves natural resources.

Cockburn’s Consultants for Cappelton Properties for land at Liberty Hall – supports neither approach. Suggests that maintaining the present policy approach does not respond to contemporary issues, current Scottish Planning Policy or the increasing housing land shortage. Suggests that the policy allow for housing proposals if they would be a logical addition to an existing small scale and more remote rural settlement but that these should not be solely affordable as this would be an artificial barrier to development.

Wemyss & March Estates – supports the reasonable alternative approach though consider it does not go far enough. Policy DC1 should be reviewed to embrace local economic and local community agendas. Recognises that DC1 has contributed over the years to maintaining East Lothian as a highly desirable place to live, to do business, to work in, for recreation and to visit with high quality built and natural heritage assets creating a sense of place, distinctiveness and identity which should be protected and enhanced sensitively. Policy needs amendment to better reflect SESplan. It should permit rural housing and should not be limited to affordable housing only. A policy similar to Midlothian or Fife would allow rural communities to expand in a small scale manner, which will create growth and help to safeguard viability and economic stability for the future. Releasing small scale sites would allow small local builders access to land Notes that the Government’s Agricultural Holdings Review Group suggested planning policy should provide for new housing to facilitate retiring tenant farmers allowing them to remain in the community whilst freeing up the farm for a new entrant or for re-letting.

Whittingehame Estate - supports the ‘Charter for Appropriate Rural Development’. Disappointed that there is an ongoing presumption against development. Villages are in danger of dying without appropriate controlled development.

Tantallon & Belhaven Bay Parks (Meadowhead Ltd) – supports neither approach. Suggests adoption of the ‘Charter for Appropriate Rural Development’.

Scottish Land and Estates – supports the ‘Charter for Appropriate Rural Development’ and would welcome further discussion and debate on it.

Kelvin Pate, Aikeyside Farm - supports the ‘Charter for Appropriate Rural Development’; parts of rural East Lothian need to grow, not just from a housing sense but a business one so people that stay in East Lothian can also work here. Planning should consider housing along with commercial development especially ones that add value to existing businesses and improve East Lothian’s infrastructure for technology based businesses. Could reduce congestion.

Chalmers & Co. – supports neither approach. Disappointed that the MIR does not propose any change to the countryside policies and does not respond to suggested amendments to planning policy proposed by the ‘Rural Voice’. Scottish Planning Policy promotes development in the countryside rather than restraint but has not been followed. Suggests the knock-on effect of failing to allow development, particularly housing, in the countryside is an increase in rural house prices as demand outstrips supply. Suggests additional support for businesses in the countryside. Supports the ‘Charter for Appropriate Rural Development’.

Other Respondents – Several respondents sent emails supporting the ‘Charter for Appropriate Rural Development’ including Zwan Consulting; the Regional Manager for Scottish Land and Estates; Farm Manager for Eaglescairn Estate; Site Manager for East Lothian Produce and 6 members of the public. An additional 4 members of the public forwarded copies of it without expressly stating that they supported it.

The ‘Charter for Appropriate Rural Development’ aims to reflect the aspirations of the East Lothian rural community; recognise the economic importance of the countryside; the need for development and change to realise its potential economic contribution; need to strengthen communities need to conserve biodiversity, built heritage and landscape quality; give certainty on appropriate development in the countryside over the next 5 years and act as a basis for development in the next local development plan. It suggests that development proposals that satisfy the criteria below should be encouraged as appropriate rural development:

- Bring benefit to the local community either directly or indirectly through sustained investment in the area.
- Harness natural resources responsibly at an appropriate scale for shared benefit and to broaden environmental diversity.
- Offer opportunities for employment, recreation, affordable housing and education particularly in areas of greatest need.
- Promote use of renewable energy and reduce dependency on fossil fuels.
- Encourage constructive engagement with neighbours and affected groups for planning and development proposals.
- Enhance rather than detract from the overall landscape – recognising the requirement for rural communities to evolve and adapt to pressure, needs and opportunities both from within and placed upon them from neighbouring urban communities.
- Conserve the built heritage of the county with adaptations to meet changing demand.
- Retain above all a sense of respect for scale and proportion; respect for our history; respect for present communities and consideration for future generations.

It suggests that detailed information on these bullet points should be developed in the Proposed Plan and accompanying Supplementary Guidance and that the local development plan should be the spatial expression of the wider ambitions of the East Lothian Community Development Plan and the East Lothian Council Economic Development Strategy for rural communities.

Community Councils and local interest groups

9 support the Preferred Approach
6 support the Reasonable Alternative
5 support Neither Approach

Haddington Community Council – suggests that small housing developments in the countryside should be permitted provided they were in keeping with its character and preferably where it can give a priority to the local population to buy/rent them. Large housing development should not be permitted in the countryside.

Prestonpans Community Council - supports the preferred option. By way of example, for Prestonpans, the protection from unnecessary development of areas such as “the Greenhills” and Morrison’s Haven should become mandatory.

Gullane Area Community Council – supports the preferred option. Favours rigorous restrictions against development in unspoilt coastal areas, such as the whole coastal strip from east of North Berwick to west of Aberlady. Concerned that if the Council introduces Countryside Around Towns designations there may be a tendency towards a more lenient approach to the development of land in the countryside which lies outwith the designated areas and hope that the Council would vigorously resist such a tendency.

Cockenzie and Port Seton Community Council - supports the preferred option. Would like to see the countryside and rural areas protected from urbanisation. Would prefer old buildings in the countryside were refurbished and reused rather than demolished and replaced by a new building.

Dunpender Community Council – supports the preferred option. Agree with the current policy.

East Lammermuir Community Council – supports very small scale housing in rural areas and suggest a 2% per annum approach with a fair minimum number to encourage developers to ensure integration into local communities citing an example at Hoprig near Oldhamstocks where two houses are under construction. This would be more sensitive to local communities, and more likely to see future integration of new residents, than developments such as the 16 houses proposed for Stenton.

Garvald and Morham Community Council – supports the reuse of derelict buildings before any new build is considered.

North Berwick Community Council – supports reasonable alternative to enable a) like for like replacement building and b) where local need for affordable housing can be demonstrated and “very small scale” is defined. Gives opportunity to retain some of the existing features provided that reasonable safeguards are in place to prevent building in green areas.

Pencaitland Community Council – supports the reasonable alternative a) like for like building replacement and b) very small scale affordable housing.

Humbie, East and West Saltoun and Bolton Community Council – supports the reasonable alternative option to enable a) like for like replacement building and b) where local need for affordable housing can be demonstrated and “very small scale” is defined. All disused buildings should be allowed to be developed subject to tight conditions on the nature of the redevelopment. The policy should enable both housing and business development; enable architecturally distinct buildings to be created; restrict the size of the redevelopment to ensure that the existing community is not overwhelmed with new residents and the character of the existing village/hamlet is not altered in an unrecognisable fashion; recognise the lack of transport and provide adequate parking within any development; and recognise the nature of accommodation/tenures needed in the vicinity (e.g. a block of flats more commonly found in urban areas would not be appropriate).

Bolton Steading Resident’s Association – supports the preferred option and endorse the comments made by the Humbie, East & West Saltoun and Bolton Community Council.

Musselburgh Parish Grouping of the Church of Scotland – supports the preferred approach

Association of East Lothian Day Centres – supports the preferred option to protect East Lothian’s unique Countryside and Coastal vistas.

Dirleton Village Association – supports the preferred option. Supports rigorous restrictions against development in unspoilt coastal areas, such as the whole coastal strip from east of North Berwick to Aberlady. Notes that such restrictions seem to apply to both the preferred and reasonable alternative options.

Common Weal Dunbar – supports the preferred approach with the proviso that the Proposed Plan should encourage developments such as community growing space/ other community led activities.

Sustaining Dunbar - supports more flexibility regarding development in the countryside where it is in connection with land-based enterprises and with community led initiatives such as eco-villages, co-housing and alternative models for affordable housing such as community land trusts and self-build projects. Notes that eco-village development such as Cloughjordan in Ireland can support rural regeneration and employment.

East Lothian Agricultural Discussion Society – supports the reasonable alternative option. Perceives that developments in the countryside subject to Section 75 Agreements are time consuming and expensive to comply with. ELC planning policy has a long-term impact on countryside businesses. Small scale development should be promoted in Whitekirk, Drem, Garvald, Gullane, Stenton, Athelstaneford and Spott to enable local tradesmen to be employed in the building phase and promote sustainable local economic growth. Existing farm holdings should be considered for development/conversion to dwellings, and planning consent should not be too restrictive. Should also promote light industry in the vicinity of new small developments.

Fisherrow Waterfront Group; and Eskmuthe Rowing – supports neither option. The approach suggested is very protective of landscape and does not celebrate the potential for recreation on the Forth Estuary. More thought/guidance required as to the types of development which should be encouraged to benefit local people and the environment e.g. the LDP should make clear that the exploitation of mineral resources is not a sustainable form of development and therefore is unlikely to be acceptable whereas small local developments which will enhance Fisherrow as a visitor destination should be welcomed. East Lothian's waterfront is not a homogeneous area and a blanket protection of the coast could stifle forms of development which will support and enhance the economic well-being of the area.

Haddington & District Amenity Society – supports neither option. Suggests a different approach to parts of the rural area with special areas (including coastal and Hillfoot Trail villages and the relative wilderness of the Lammermuirs) deserving stronger protection against development proposals because they are so close to Edinburgh. In other parts of the countryside the replacement of uninhabitable dwellings and affordable housing as additions to rural settlements or groups of dwellings is supported, but the footprint must be defined. The proposed plan could designate countryside where change could take place and protect and enhance coastal habitat or special landscape area. Rural development must be supported with policies that outline the qualities and design of any new development. The extension to Bolton shows where new development fails to harmonise with the existing settlement. New development must be subservient to existing development and must adopt the local vernacular in design, colour and materials. The context for and significant constraints on enabling development should be explained in policy as its recent implementation has led to developments in areas unsuitable for housing. Support for development in the countryside must be backed up by super fast broadband.

Aberlady Conservation and History Society – supports neither option. Should be no significant housing development in the unspoilt coast and countryside of Aberlady as its character and the character of the coast communities would be irretrievably harmed by new housing disproportionate to existing development.

Scottish Green Party East Lothian – supports neither option. Supports more flexibility regarding development in the countryside where it is in connection with land-based enterprises and with community led initiatives such as eco-villages, co-housing and alternative models for affordable housing such as community land trusts and self-build projects. Notes that eco-village development such as Cloughjordan in Ireland can support rural regeneration and employment.

Members of the public

47 support the Preferred Approach. Reasons given include:

- coastline is economically very valuable and ought to be protected
- fear that the alternative will be open to significant abuse
- Only if strong enough definition to prevent developers controlling what happens through use of the appeal process
- Protect the countryside
- Significant constraints on the coast to keep it largely unspoiled
- Small scale development in the countryside, as proposed in the alternative option would be the thin end of a large wedge if allowed to proceed, as it would be used as precedent for expansion to meet future needs
- An area must not be allowed to deteriorate to obtain planning permission for it
- The character of the county is dependent on the preservation of the coastline
- Affordable housing should be built close to public transport routes and within easy reach of schools and town centres not in the countryside
- Allowing small scale "affordable" housing proposals would just provide a loophole for developers to exploit, without improving the availability of affordable housing
- Let's halt all this building, except in cases of genuine need for small rural businesses based in the country. Do not, please, ever allow the type of development seen at Archerfield, which is wholly inappropriate and often used merely as holiday homes for the very rich
- I'm so suspicious of developers that I can see small scale affordable development being exploited; best not have it at all
- Strongly support Scottish Planning Policy principle that countryside areas accessible from cities and main towns, such as East Lothian, should be protected against unsustainable growth in car based commuting and the suburbanisation of the countryside
- Vital that the character of the coastal villages is protected as far as reasonably possible
- Character of East Lothian's countryside could soon be eroded by diminution of planning regulations
- East Lothian is very much based on tourism with wonderful golf courses walks and scenery Must maintain this to ensure unspoiled countryside and coastline are preserved
- Back the presumption against development in areas of unspoilt coast
- support the preferred option of presuming against development of the countryside and coast while the area continues to be under threat from Edinburgh and the SDP
- Small scale development in the countryside, as proposed in the alternative option would be the thin end of a large wedge if allowed to proceed, as it would be used as precedent for expansion to meet future needs

- Concerns that affordable housing in the countryside is not the right place for it and it could disrupt the way of life
- What precedence does Policy DC1 have over other policy documents and especially over SESplan requirements and policies?

24 support the Reasonable Alternative Approach. Of these 6 supported option a (like for like replacement of a building) only; no one supported option b) (very small scale solely affordable housing) only and 16 supported options a and b. Reasons given include:

- reasonable alternative is fine as far as it goes, however it should be even more restrictive on development taking into account the needs and wishes of local communities
- Seems ridiculous to assume that rebuilding a burnt out house would count as spoiling the coastal region; or that building affordable housing in an area already settled would do so
- Yes to like for like housing but no to affordable housing loophole
- Bring back old derelict buildings into residential use in small communities
- No development along parts of the coast that are currently unspoilt
- Disagree that only affordable housing should be built in rural locations; if the architecture is innovative or beautiful and enhances a countryside location it should be permitted if local residents are content
- Small projects, self build, unobtrusive building and renovation of existing buildings could be allowed; these should be small scale affordable housing - no massive houses!
- Although rural the countryside should not be depopulated. Sensitive new development using traditional materials and quality building design (traditional and modern!) should be accommodated and redundant buildings should be brought back to life.
- Could address shortage of low cost housing; some small settlements would benefit from larger populations, making amenities such as schools and shops more viable
- Since the reasonable alternative appears to be a gentle modification of the preferred approach, I think I support both but all coastline that has not already been developed should be marked as unspoiled and protected from future development
- Affordable housing permitted if supported by local surveys
- Affordable housing supported provided it is genuinely affordable and subject to long term selling restrictions

10 support Neither Approach. Reasons given include:

- Build more tenements in towns; its effective housing
- Support reasonable alternative of options a and b plus an allowance for other exceptions to re-use property that has been vacant, redundant or derelict for longer periods
- Unfortunate that a rural county should be so restrictive of allowing re-use of buildings in the countryside which leads to loss of buildings; abandonment of existing property because it is rural is not a sustainable position and is contrary to the overall character of East Lothian
- East Lothian must continue to attract tourism
- Like for like replacement, restricted to "affordable housing," is a straight jacket
Redevelopment to a high standard should not be ruled out. It would be in keeping with East Lothian's character to encourage high class, modern architecture in the countryside (not pastiche)
- The expansion of small rural communities should be treated on a case by case basis, with the conservation of the existing settlement given priority; it could contribute to housing target in a way that respects East Lothian traditions
- Steading development should be encouraged but enabling development reined in

- Affordable housing should be provided in a mix of housing in any countryside proposal
- Allow the conversion of redundant buildings; some small scale development could be beneficial
- Relaxation of the planning regulations should favour new (small) developments in and around existing settlements and farms and other building clusters, including imaginative discrete developments

KEY MESSAGES

- **Of the key agencies, Scottish Government seek further clarification as to whether all of East Lothian's countryside should be categorised in the same way which might result in different policies for different parts of East Lothian's countryside and want agricultural land protected. SNH emphasise the importance of development fitting with local development patterns and landscape character, the identification of the unspoiled coast and coastal erosion and flood risk to be considered. SEPA supports the preferred approach but with the identification of significantly constrained coastal areas, unspoiled coast and that at risk from flooding. Scottish Enterprise and Network Rail note that the need to protect natural resources of coast and countryside must be balanced with role of the coast and countryside in delivering essential infrastructure.**
- **East Lothian Council Landscape and Countryside supports the preferred approach but wants stronger protection for the coast which is the busiest in Scotland.**
- **Prestonpans, Cockenzie, Dunspey and Gullane Community Councils support the present policy to restrict development in the countryside with North Berwick, Pencaitland and Humbie/Saltoun/Bolton supporting the reasonable alternative to permit like for like replacement and very small scale solely affordable housing in the countryside. East Lammermuir would support other very small scale housing in the countryside and Garvald and Morham support the reuse of buildings before any new build is considered. Local interest groups in the coastal villages wish to see development restricted in this area. Some local interest groups wish to see policy support for community led initiatives including eco-villages. Others consider that the coast offers recreation potential that should not be prevented by policy; that broadband infrastructure should be permitted and HADAS recommend different policy approaches in different parts of the countryside. Area Partnerships did not specifically respond to this question.**
- **The vast majority of members of the public support the present policy with a number willing to amend it to permit replacement buildings and very small scale affordable housing. Several mentioned the importance of the countryside to tourism and only a very few support opening up the countryside to private housing development.**
- **The vast majority of landowners, developers and agents want to see the countryside opened up to more development the most commonly mentioned being housing development. Many see East Lothian's current policy as overly restrictive and inconsistent and the National Planning Framework especially in regard to offshore infrastructure development and with Scottish Planning Policy.**
- **The National Trust, Wildlife Trust and RSPB support the present policy. Sport Scotland want it to recognise country parks and the Architectural Heritage Society want to separate coast policy from countryside policy. Homes for Scotland supported the reasonable alternatives though consider there may be scope to allow further developments.**

Issue:	MIR question:
Musselburgh Cluster	Question 11
Total number of responses on issue	226 (plus 52 additional petition signatories)
Support preferred approach	39
Do not support preferred approach	143 (plus 52 additional petition signatories)
Scottish Government, key agencies, and adjoining authorities	
<p><u>Historic Scotland</u> notes it would be unlikely to support OTH-M14 (Howe Mire) if included within the Proposed Plan due to impacts on the battlefield. Provides detailed comments on a number of other sites to ensure appropriate mitigation of any impacts. In relation to Goshen (PREF-M9) this has potential to raise issues of national significance in terms of the battlefield but there is potential to mitigate this through design.</p> <p><u>Transport Scotland</u>: There is currently no commitment by Transport Scotland to either fund or deliver the ‘parkway’ station in Musselburgh which is identified as safeguarded in the current LDP. Any safeguarding of land should not be included in the LDP unless the appropriate assessments have confirmed viability, unless their ‘proposed’ status is specifically identified.</p> <p><u>Scottish Natural Heritage</u> – has concerns over PREF-M11 at Dolphingstone due to landscape and visual impact. Believe ALT-M5 at Whitecraig North and OTH-M14 at Howe Mire would be preferable from a landscape and visual point of view. Whilst other sites do raise some landscape and visual issues they advise that these could be mitigated using site briefs or strategic design frameworks and provide detailed advice on these.</p> <p><u>Scottish Water</u> has no preference for particular sites and will support development in line with its responsibilities.</p> <p><u>Midlothian Council</u> believes there is merit in the ‘compact’ approach but has some concerns over education and transportation constraints and seeks continued joint working to address these. In relation to education, notes that one option in the Main Issues Report is for East Lothian to utilise the proposed Shawfair Secondary School. Confirms that this is unlikely to be available before 2032 and does not currently provide for accommodating pupils from outwith Midlothian; early discussions would be welcomed if the Council wishes to pursue this option. Midlothian would not be willing to utilise education capacity within East Lothian - e.g. a new school at Craighall. In relation to transport, advises that there is currently no certainty over provision of a link road through Newton Farm to A68/A720 junction and request further dialogue on this matter. Also concerned at proposed Tranent bypass and potential implications for Dalkeith. The Transport Appraisal needs to address this. Would welcome discussion on potential links to A1 from employment sites within Midlothian (Millerhill area). Unclear whether cross-boundary transport impact of sites at Whitecraig has been assessed. Whitecraig has few facilities and limited public transport; developer contributions should contribute to rectifying this. There are green network opportunities between sites in East Lothian and Shawfair railway station and town centre. May be potential to utilise waste heat from Millerhill Zero Waste facility. Relationship of employment within PREF-M1 to proposed housing within Midlothian at Newton needs to be considered.</p>	
National interest groups	
<p><u>Royal Society for the Protection of Birds (RSPB) Scotland</u> states that development on sites PREF-M8/9/10 must not impact on the biodiversity interests of Musselburgh lagoons. Environmental</p>	

impact must be assessed and mitigated, including recreational disturbance. Strongly supports designation of Levenhall Links as Local Nature Reserve. Where woodland is planted to mitigate impacts of development and deliver green network only native trees should be used.

Network Rail supports the preferred approach. The impact of new development on stations, including parking, should be addressed. Sites PREF-M1 (Craighall), PREF-M9 (Goshen) and others are likely to have impacts on Musselburgh and Wallyford stations.

Coal Authority supports the requirement to consider ground conditions and methods of mitigation.

Homes for Scotland believes there is a shortfall in the proposed supply of housing throughout all the clusters that has implications for the Proposed Plan. The Council should review the approach to decisions on windfall sites to maximise housing delivery in the short to medium term.

National Trust for Scotland supports regeneration of Edenhall hospital (PREF-M6) but is concerned at possibility of expansion towards Crookston Road due to impacts on Inveresk Conservation Area as well as agricultural land and archaeological potential.

Landowners, developers and agents

Scottish Power Generation Ltd supports restoration of Levenhall lagoons and promotion of site for Local Nature Reserve.

Scott Hobbs Planning on behalf of Queen Margaret University (QMU) believes a more focused approach to strategic employment land would maximise the opportunity for synergy between the University and adjacent economic land. Should be specific references in Local Development Plan to business and education-led hub opportunity centred on QMU. Does not support employment site PREF-M2 as this would compete with a business and education-led hub centred on the University; similarly 55ha release of land within rail freight line for employment (part of PREF-M1). Supports release of employment land east of QMU for mixed use development, subject to phased delivery of essential infrastructure.

Scott Hobbs Planning Limited on behalf of Ashfield Land believes the Goshen site (PREF-M9) meets the tests of effectiveness, and there is evidence of demand from the housebuilding industry to build houses at the site in the short term. Detailed work has been carried out on green belt impacts, assessing the site in terms of character, identity, and coalescence. The mix of large and small sites proposed in the Musselburgh cluster provides the best opportunity for delivery of housing in the short term. Other strategic housing allocations in Midlothian and Edinburgh are complementary to the compact strategy approach included within the Main Issues Report and provide choice and flexibility. Consider that more completions can be achieved here than set out in MIR. Committed to delivery of a primary and secondary school on the site. Supports 'roof tax' approach to secondary education; this has been successfully used elsewhere. Catchment review should not be an impediment to progression of the Plan.

Derek Scott Planning on behalf of East Lothian Developments Ltd supports the principle of increasing the number of homes within the Wallyford allocation but requests this be 400, not 350 (PREF-M13). Has submitted market assessment that seeks to demonstrate that the allocation of the Goshen site (PREF-M9) would undermine the existing allocation at Wallyford. Welcomes recognition of Dolphingstone as suitable for development (PREF-M11) but argues this should be as 'preferred land release', not 'safeguard'. Wallyford should be the location of additional secondary education capacity and offers land for a new school; this would have a number of advantages (set out in detail).

Geddes Consulting on behalf of Sirius Sport & Leisure believes further sites will be required in the cluster to assist in meeting the SESplan housing land requirement. An assessment of housing land supply is submitted in support of this position. Proposed allocation of OTH-M14 (Howe Mire) for 170 homes and 27 small business units. It is a viable and effective site and can be developed over a 6-year period, including affordable housing. A Heritage Assessment concludes that the site is not part of the core area of the battlefield.

Geddes Consulting on behalf of Lothian Park Ltd believes further sites will be required in the cluster to assist in meeting the SESplan housing land requirement. An assessment of housing land supply is submitted in support of this position. Supports employment site PREF-M2 as this supports their ambitions to realise employment opportunities at Old Craighall junction, and could make a significant contribution to economic development targets.

Geddes Consulting on behalf of Wallace Land and The Sir John Hope Executry believes further sites will be required in the cluster to assist in meeting the SESplan housing land requirement. An assessment of housing land supply is submitted in support of this position. Proposed that Whitecraig North (ALT-M5) should be allocated for 150 homes. The site is a viable development proposal and is effective. It can be developed over a 5 year period including affordable housing in the initial plan period.

Montagu Evans on behalf of Buccleuch Property submits that 300 dwellings can be delivered at Whitecraig South (PREF-M4) by 2024. The site is within the Strategic Development Area, accords with Scottish Planning Policy, scores well in site assessment, would have regeneration benefits, and is an effective site. It is well placed to allow for an expansion of the primary school. Opposes the alternative Whitecraig North (ALT-M5) on grounds of landscape, green belt boundaries, illogical extension, lack of contribution to regeneration.

Persimmon Homes believes there is a significant over-allocation of employment land within the cluster, in particular at Craighall (PREF-M1). The majority of new preferred sites are unlikely to deliver completions within the first plan period due to constraints [to 2019]. There should be an increase in housing and a decrease in employment at this site. Believes the Council needs to provide more information on education aspirations and requirements. Offers site for a joint primary and secondary school facility. Upfront funding will be required to deliver a new secondary school.

Holder Planning on behalf of Persimmon Homes East Scotland is broadly supportive of the preferred approach and welcomes the mixed use proposal at Craighall (PREF-M1). Believes site has greater potential for housing, of up to 1550 homes with a reduced area of 20ha for a business park. This will assist in providing infrastructure. Concept Masterplan submitted in support of this position. The site may also be capable of accommodating a secondary school if required. Provides detailed comments on the site assessment.

Holder Planning on behalf of Taylor Wimpey plc believes it is inappropriate to consult on further development at Pinkie Mains (PREF-M7) as the principle of development has already been established here. The Proposed Plan should reflect this.

Holder Planning on behalf of Cala Management Ltd supports development at Newton Farm (PREF-M3(b)). Confirms willingness to work with owner of adjacent site (PREF-M3(a)) on joint masterplan.

Ryden on behalf of Cala Homes proposes an additional site for 45 homes south of Edenhall/Inveresk [site previously assessed but not included in Main Issues Report]. Further residential development

in Inveresk will contribute to a range and choice of housing sites. The site is capable of being effective.

APT Planning and Development on behalf of Cala Homes supports Levenhall (PREF-M4) as an attractive and sustainable site. As a small-scale development it is deliverable in the short term, with limited and manageable impacts on local infrastructure. It is the only site in the Musselburgh cluster with a named developer that can meet the higher-end sector of the market.

Gladman Developments Ltd believes that when considering the approach to secondary school education consideration must be given to the implications of developer contributions in terms of viability and effectiveness and the longevity and sustainability of any solution. Notes two large sites in cluster will have longer lead in times.

Clarendon Planning & Development Ltd on behalf of The Executry of the Late Sir John Hope believes early starts will be required at Craighall (PREF-M1) and Goshen (PREF-M9) to achieve the stated completions, involving approvals prior to Plan adoption. An additional site is proposed for around 200 homes, on land north of Wallyford station. The landowner is committed to equitable developer contributions for education. Public borrowing based on repayment as housing sites are consented is a sensible option.

Clarendon Planning & Development Ltd on behalf of the Traquair Family believes early starts will be required at Craighall (PREF-M1) and Goshen (PREF-M9) to achieve the stated completions, involving approvals prior to Plan adoption. Proposed phasing is questionable. Supports PREF-M3(a) at Old Craighall as a short-term deliverable site, also proposes a 'phase 2', extending this towards Monkton House [larger site assessed in Interim Environmental Report but whole site not included in Main Issues Report]. Concerned that SESplan obligations may not be met if there is a restriction on larger scale development until a funding solution is found for Musselburgh Grammar.

Strutt & Parker support PREF-M13 as an extension to the proposed Wallyford development but seek alterations to proposed settlement and green belt boundaries to include Eskfield Cottages within the settlement to allow for a single new dwelling.

Residents of 8 and 9 Carberry Close would like land to the rear of their houses removed from the green belt to allow change of use to garden ground.

Whitehall Lodges notes in the intention to allocate Goshen (PREF-M9) but believes this will preclude continued operation of Drummohr caravan park. The Plan must make adequate provision for tourism and related uses. They also suggest a site for such uses at Wallyford Toll.

Charles Phillips & Sons seeks consideration of premises at Wallyford Toll in the Proposed Plan to allow for redevelopment or change of use.

Cardross Asset Management Ltd believes certain of the preferred sites have severe remediation issues [sites not specified]. Education capacity should be funded and delivered by Scottish Government and the Council allocating sufficient capital expenditure to provide the required school places within proposed housing sites.

Community Councils and local interest groups

Musselburgh and Inveresk Community Council believes Goshen (PREF-M9) could undermine the Wallyford allocation. Also opposes OTH-M14 on the battlefield. Concerned at traffic and air quality

impact of scale of development. Rail improvements will be essential. There should be a single secondary school within the town. Concerned at the impact on health and social care services. Action needed on flood prevention scheme.

Prestonpans Community Council supports a 'hybrid' approach including some sites and not others. 4700 new homes will damage local communities and the environment. Specifically opposed to Levenhall (PREF-M8), Goshen (PREF-M9) and Drummohr (PREF-M10) due to loss of green belt, agricultural land, coalescence, traffic and access impacts (including on Salter's Road in Wallyford), air quality, flooding, impact on timescales for Wallyford development, wildlife, no prospect of mitigating impacts, setting of Drummohr House. Supportive of increased capacity at Wallyford (PREF-M13), Dolphingstone (PREF-M11), Craighall (PREF-M1), and expanding Blindwells. Craighall could potentially accommodate more than 700 homes. Any shortfall could be met through a modest expansion of villages with public transport and education capacity. East Linton may be appropriate location with a station due to re-open. Also opposed to development at Westpans (PM/MH/BUS009) or Prestongrange Mining Museum (PM/PP/BUS006) [both sites assessed in Interim Environmental Report but not included in Main Issues Report]. In terms of education, opposes use of Preston Lodge to accommodate Goshen; capacity should be reserved for Blindwells. Supports Wallyford as location of new secondary facility within the Musselburgh cluster.

Dunpender Community Council believes development should be spread across all wards (and Blindwells).

Musselburgh Area Partnership accepts there will be a level of development needed to accommodate the needs of the community but believes the preferred approach is too concentrated and will bring about significant pressures to infrastructure in the long term (in addition to existing problems). A second secondary school should be avoided as this may create a 'split-culture'.

Musselburgh Conservation Society raises concerns about infrastructure and environmental capacity and believes the level of development proposed is too much, particularly to east of Musselburgh due to traffic and coalescence impacts. The east side of Musselburgh needs an employment allocation. Craighall (PREF-M1) could accommodate more than 750 homes though coalescence should be avoided. Supports Whitecraig South (PREF-M4) but opposed to Whitecraig North (ALT-M5) and to Howe Mire (OTH-M14). Believes infrastructure should be funded by developers and government. Preference for a single school. The Grammar School site should be retained if possible but if a new site is needed land adjacent to QMU is the best option. Rail improvements will be required, and action on Old Craighall junction.

Inveresk Village Society is pleased there are no proposed developments in the vicinity of Inveresk but is concerned at traffic and pollution impacts on development elsewhere in cluster. There should be a significant reduction in housing numbers. Particularly concerned about development east of Musselburgh due to impacts on town centre and Inveresk. Opposed to Goshen (PREF-M9), also to Howe Mire (OTH-M14).

Musselburgh Grammar Parent Council believes a roll of 2600 is too high for a school; would make it difficult for teachers to get to know young people. Changes are needed to the existing building whatever option is chosen. Welcomes idea of new school but does not support a two-school option as this would split community and create rivalry. Does not support split campus with junior and senior phase as this would affect development and transition. The school should remain on one campus. Any new school could incorporate a vocational element. Open to idea of community school.

Stoneyhill Primary School Parent Council believes a second secondary school would harm the sense of community. Recognises benefits a new single secondary school would bring. Options include relocating sports centre and extended, building a new school in stages at Goshen, dispersing development further across East Lothian, e.g. Blindwells. Recognises need for review of catchments in any case.

Scottish Green Party East Lothian supports need for land for local skills training. Supports move away from low density suburban sprawl, mix of property types, promotion of community-led developments, provision of open space, and active travel.

Association of East Lothian Day Centres believes there is a need for more sheltered or supported housing in Musselburgh, with an ageing population and likely increase in demand. Education capacity increased should be funded and delivered by developer contribution and local occupancy tax.

Musselburgh Parish Grouping of the Church of Scotland believes traffic and education constraints will take longer to resolve than anticipated. Developers should fund and deliver increased education capacity. Musselburgh Grammar should be retained as it is close to the town centre, perhaps as an Upper School with a Lower School at Goshen. Wallyford and Pinkie primaries can be enlarged.

Ravensheugh Tenants and Residents Association supports comments of Musselburgh Conservation Society [see above] and encloses petition with 53 signatures of local residents which opposes the compact Preferred Approach. Also encloses several copies of standard letter regarding Goshen [detailed below].

Old Craighall Residents and Tenants Association believes developers should be forced to develop their landbanks. Musselburgh is already over-populated and lacks green space. More housing would generate more traffic congestion and pollution. Development should be spread along the A1 corridor; this would result in improved public transport in these areas. Education provision should be funded through a 'tax' on developers. Having one new secondary school and one old one would create a 'two tier' system and frictions between pupils.

Fisherrow Waterfront Group and Eskmuthe Rowing Group are disappointed at the focus on location of future development sites. The Plan should more fully address tourism and recreational development. The town centre should be a focus for regeneration and Fisherrow has potential as a recreational hub. Further work should be carried out to reduce the flood risk to Fisherrow.

Rail Action Group, East of Scotland (RAGES) believes there should be more frequent trains. Fare collection is an issue and gates at stations would help. Car parking is limited and a shuttle from the town centre should be run. New development should have transport links planned in advance.

Bolton Steading Residents Association supports the preferred approach but would like to see evidence of demand from industrial and commercial sectors.

Members of the public

Supportive of preferred approach

A minority of respondents were in support of the preferred approach to housing and employment opportunities in the cluster. The reasons were:

- Demand for homes in the area; all preferred sites are needed to meet housing requirements
- Musselburgh already virtually a suburb of Edinburgh, has quickest bus and train links to the city, transport infrastructure less polluting than alternative options
- Opportunities for local job creation, regeneration needed in some areas, potential to drive recovery of High Street and social sustainability
- Concerns over service infrastructure are inevitable wherever large numbers of houses are proposed; basic infrastructure requirements can be met

Opposed to preferred approach

A majority of respondents were opposed to the preferred approach. Some of these made comments on the cluster as a whole while others objected only to specific sites (see below). The main reasons for opposing the preferred approach in the cluster were:

- Transport impact – traffic volume, congestion, air quality, road safety, lack of public transport capacity, commonly including concerns about the town centre and/or Old Craighall junction, as well as train overcrowding
- Loss of green belt; impacts on coalescence and loss of settlement identity, character and setting; merging with Edinburgh
- Loss of agricultural land and green space, reduced accessibility of coastal and countryside walks
- Lack of infrastructure including education capacity and services (NHS, police, fire); impact on sports facilities
- May be better to build smaller with potential for expansion in future
- Impact on historic battlefield
- Impacts on quality of life for local residents
- Should not build in Musselburgh simply because there is need and demand; expanding towns is not the answer
- Lack of finance; not deliverable or realistic; too much development in one area
- No reference to care for elderly
- Opportunities to increase local employment not proven

Opposed to Goshen (PREF-M9)

A large number of responses were specifically opposed to site PREF-M9 at Goshen. These included around 100 copies of a standard letter raising issues of traffic, coalescence, impacts on Drummohr House, and flooding. Other issues raised by respondents were:

- Impacts on green space, congestion, air quality, settlement identity, historic battlefield
- Loss of agricultural land, wildlife habitat, walking and cycling, impact on woodland
- Resident will seek financial compensation from Council in event of surface water impacts from development
- Should place emphasis on Craighall instead, increase windfall allowance, relax countryside policy, expand Wallyford site
- Lack of accompanied by employment provision

Comments were also received in support of Goshen: it is part of Musselburgh but offers chance of spare capacity that could be used by surplus demand from Preston Lodge catchment.

Comments specific to other sites

A number of comments were received in relation to other specific sites:

- Craighall area (PREF-M1/2/3) – coalescence with Midlothian and Edinburgh, poor connections to Musselburgh due to rail line and A1, no bus service
- Craighall area (PREF-M1/2/3) – support for sites close to road and QMU – potential links with higher education and business
- Whitecraig South (PREF-M4): prone to flooding
- Levenhall (PREF-M8): important green space
- Drummohr (PREF-M10): loss of countryside and open space, historic environment
- Howe Mire (OTH-M14): support for retention of green space around Inveresk and on battlefield

Education matters

A number of comments were received on education matters. There was a common view that increased education capacity should be funded and delivered by developers; some thought government funding had a role.

There were a number of views on the options around how to provide increased secondary education:

- Larger school could secure benefits compared to two smaller ones.
- Single large school would struggle to raise attainment.
- Should be replacement school or annex; having two schools would split community.

In terms of location of any new educational facilities, there were a range of views:

- A facility should be provided in Blindwells serving parts of Tranent, coastal villages, and Pinkie/Wallyford
- Support for selling existing MG site for retirement housing, create new edge of town school with adjacent sports facilities
- New school could be located At Wallyford greyhound track
- New school could be located at Wallyford
- New school could be located At QMU
- New school could be located Old Tesco site/Bruntons
- New school should be close to or within developments
- May be opportunity to involve tertiary education establishments
- Moving school away from town centre would harm traders
- Join Musselburgh Grammar to the sports centre to make community school
- Lack of consideration of school buildings as community assets due to focus on capacity
- Need to consider community flow and cohesion
- New schools must be accessible by safe routes

Other comments relating to education provision:

- Contributions should reflect overall cost (roof tax approach)
- Catchment boundaries need reviewed as some sites span boundaries
- Should move Edinburgh's boundary to include Musselburgh and make it Edinburgh's problem

- Opposed to PFI – counter-productive
- Concerned at different approaches being taken in different areas – e.g. planning application in Ormiston refused due to lack of school capacity

Misc comments

- Infrastructure and transport measures should be put in place first (including vehicle reduction); more strategic approaches are required – e.g. congestion charging
- Likely to be delays in starting due to downturn and other factors reducing business confidence
- Development should be located between Edinburgh and Glasgow; this would be better for commuting
- Should redistribute development across SDA, increase windfall allowance, and be less restrictive in countryside
- Support for restoration of lagoon 6; benefits to local residents and biodiversity
- The plan should not overstate flood risk and blight properties.

KEY MESSAGES

- **Historic Scotland advise that the site at Goshen (PREF-M9) has potential to raise issues of national significance in terms of the battlefield but these impacts could be mitigated through design. Would not support development of OTH-M14 Howe Mire due to impacts on battlefield.**
- **Transport Scotland advise that there is currently no commitment by them to either fund or deliver the ‘parkway’ station in Musselburgh which is identified as safeguarded in the current local plan.**
- **SNH has concerns over PREF-M11 at Dolphingstone due to landscape and visual impact and believe ALT-M5 at Whitecraig North and OTH-M14 at Howe Mire would be preferable from a landscape and visual point of view.**
- **Midlothian Council believes there is merit in the ‘compact’ approach but has some concerns over education and transportation constraints and seeks continued joint working to address these. Would allow ELC to utilise education capacity within Midlothian but would not consider utilising education capacity within ELC.**
- **Network Rail supports the preferred approach. Sites PREF-M1 (Craighall), PREF-M9 (Goshen) and others are likely to have impacts on Musselburgh and Wallyford stations.**
- **Homes for Scotland believes there is a shortfall in the proposed supply of housing throughout all the clusters that has implications for the Proposed Plan.**
- **There was a mix of views on the overall approach to the cluster, with some in favour and some against;**
- **In general terms, many respondents felt development on the east of the cluster in particular would impact on traffic and air quality in the town centre and therefore the west of Musselburgh was preferable;**
- **Common concerns in all areas were loss of green belt, agricultural land, transport impacts, infrastructure and services;**
- **Other respondents noted that Musselburgh was in demand, had the best transport links to Edinburgh, and there were potential regeneration benefits;**
- **Site PREF-M9 at Goshen attracted the most significant volume of comment, a clear majority of these objecting – key issues included infrastructure (education/transport), traffic congestion and air quality, loss of green belt, settlement coalescence;**

- In relation to education, there were a range of views on the best approach but a common theme was opposition to having two secondary schools in the cluster. The main reasons related to impacts on community integration;
- Sites at Goshen, Craighall and Wallyford all presented themselves as locations within which new primary schools and / or secondary schools could be located;
- The table below indicates the views expressed in relation to particular sites.

Secondary school cluster area:		Musselburgh		
MIR reference	Site name	Support	Object	No opinion
PREF-M1	Craighall	18	15	17
PREF-M2	SW of Old Craighall Junction	16	14	15
PREF-M3(a)	Old Craighall East	18	12	19
PREF-M3(b)	Newton Farm (Old Craighall East)	19	11	20
PREF-M4	Whitecraig South	21	13	12
ALT-M5	Whitecraig North	16	13	15
PREF-M6	Edenhall	16	12	18
PREF-M7	Pinkie Mains	19	20	14
PREF-M8	Levenhall	16	19	15
PREF-M9	Goshen	13	129 (plus 52 petition signatories)	16
PREF-M10	Drummohr (safeguard)	18	17	15
PREF-M11	Dolphingstone (safeguard)	19	11	16
PREF-M12	Barbachlaw	14	11	20
PREF-M13	Wallyford	26	15	13
OTH-M14	Howe Mire	7	18	22

Issue:	MIR question:
Prestonpans/Port Seton/Cockenzie/ Longniddry Cluster	Question 12 (<i>See also Q22 (Energy) in relation to Cockenzie Power Station</i>)
Total number of responses on issue	213
Support for preferred approach	41
Opposed to preferred approach	31 (note 102 additionally opposed to Cockenzie power station PEF-P1)
Scottish Government, key agencies, and adjoining authorities	
<p><u>Scottish Environment Protection Agency</u> notes that a Flood Risk Assessment would be required for proposals at both Cockenzie and Longniddry sites. There is an opportunity to restore a minor watercourse at the Cockenzie site. Depending on whether the Cockenzie site became a 'regulated site', potential issues of co-location would need to be considered. The Longniddry site could have impacts on bathing water.</p> <p><u>Historic Scotland</u> raises concerns about the potential impact of the Cockenzie site on a Scheduled Monument in its southern part. Development may be possible in the majority of the area but impacts on the monument should be avoided and its future management addressed. The southern area of the site also makes a contribution to the battlefield landscape; impacts should be mitigated by design and avoiding development in this area. In relation to Longniddry South, potential impacts on listed buildings and the proximity of Gosford House inventory garden and designed landscape should be taken into account.</p> <p><u>Scottish Natural Heritage (SNH)</u> make some comments in relation to PEF-P1 Cockenzie Power Station regarding the relationship of that site to Blindwells, the loss of the identity of the nearby settlements of Prestonpans, Cockenzie and Port Seton, the loss of open space and the severance of active travel and recreation routes. However they advise a strategic design framework could address these and give guidance on them.</p> <p><u>Scott Hobbs Planning on behalf of Scottish Enterprise</u> supports the identification of the Cockenzie site for employment. Believes such designation is required by National Planning Framework 3, which identifies electricity generation at the site as a National Development, and identifies potential for employment, energy and potential port related development. Notes that National Development status is not specific to the extant consent but more generally to continued thermal generation. Keen to work with Council to maximise the site's economic development potential in the national economic interest. To comply with National Planning Framework 3 the Area of Coordinated Action must be addressed, which will require coordination between cluster areas. Seeks Council's interpretation of the National Planning Framework 3 requirement to prioritise proposals making 'best use of area's assets and securing greatest economic benefits'.</p> <p><u>Scottish Water</u> has no preference for particular sites and will support development in line with its responsibilities.</p> <p><u>Midlothian Council</u> considers development in all clusters will have 'downstream' implications for Midlothian in terms of road traffic. Using sites with rail access may be reduce cumulative impacts. Cumulative impacts should be modelled and used to define required upgrades and secure developer contributions.</p>	

National interest groups

Homes for Scotland believes there is a shortfall in the proposed supply of housing that has implications for the Proposed Plan. The Council should review the approach to decisions on windfall sites to maximise housing delivery in the short to medium term.

Network Rail would object to Longniddry South unless this was subject to further assessment on road bridge under railway (Lorne Road). Developer should be able to mitigate risk of bridge strike. Development should not include potential for vehicle access under bridges at Longniddry Farm and Kiln Garage. Additional parking should be provided at Longniddry station.

Coal Authority supports the requirement to consider ground conditions and methods of mitigation.

National Trust for Scotland has concerns over Cockenzie proposals in relation to the battlefield and John Muir Way but welcomes the Council's restriction of the site and its calls for a masterplan. Refers to its comments on National Planning Framework 3 Main Issues Report, and to comments made on Environmental Impact Assessment scoping stage by Scottish Natural Heritage, Royal Society for the Protection of Birds, and Historic Scotland.

Internal Council services

Countryside believes the Green Network in the cluster needs to be emphasised, in particular infrastructure for active travel on a cluster and more strategic basis. The potential Local Nature Reserve at Levenhall should be extended eastwards if possible.

Landowners, developers and agents

Scottish Power Generation Ltd supports the Local Development Plan recognising the provisions of National Planning Framework 3 and the Section 36 consent (for a gas-fired power station). Believes there are opportunities for mixed use development at Cockenzie, providing a flexible approach. Recognises proximity of residential areas to former coal store and believes there are opportunities on site margins for non-employment uses such as community facilities and environmental improvements. Supports a masterplan led approach to the future development of the Cockenzie Power Station site for mixed uses. The route of the proposed gas pipeline is part of the National Development and should be protected.

Forth Ports suggests development of a port linked to a renewables hub at Cockenzie is potentially unviable.

Scott Hobbs Planning on behalf of Scottish Power Energy Networks states that to comply with National Planning Framework 3 the Area of Coordinated Action must be addressed, which will require coordination between cluster areas.

Inch Cape Offshore Limited welcomes reference to planning permission for on-shore transmission works at Cockenzie. Does not object to proposed allocation but wishes to ensure its interests are not compromised and would wish to be involved in future discussions on a masterplan for the area. Believes the Local Development Plan should give greater weight to energy infrastructure issues.

Ryden on behalf of the Wemyss & March Estate advises that significant work has been done on Longniddry South in response to publication of the Main Issues Report and it is hoped that the site will be allocated in the Proposed Plan. The site is capable of delivering up to 1000 homes within 5

minutes' walk of the station in the medium to long term. Within this development plan period a smaller development of 450 homes is promoted. A Vision and Masterplan have been produced. The Main Issues Report does not direct any new housing to the cluster, contrary to the preferred strategy. The site has many advantages and the Interim Environmental Report indicates no significant issues other than loss of agricultural land. An Education Impact Assessment has been provided, which indicates that 450 homes could be accommodated with a small extension to Longniddry Primary School, which is believed to be achievable. Longniddry South would not prevent the Blindwells education strategy, even if this involves utilising Preston Lodge High School initially, which can be expanded with developer contributions from both sites. A Transport Impact Assessment concludes that Longniddry South and an expanded Blindwells can be accommodated on the local road network. A number of improvements can be made to the road network and to promote public transport. A Flood Risk Assessment has also been produced.

Nathaniel Lichfield and Partners on behalf of Bourne Leisure Ltd seeks a comprehensive strategy for the area that takes account of impacts on Seton Sands holiday park. Applicants should have to assess impacts on tourism and the visitor economy, and effects should be mitigated.

Holder Planning on behalf of Mr A P Dale and Mr R F Dale proposes an additional housing site between Port Seton and Seton Sands on the basis that additional sites will be needed to meet housing requirements. The site is believed to be a logical extension to Port Seton and could accommodate up to 150 homes over a 5 year period.

Geddes Consulting on behalf of Wallace Land believes further housing sites will be required in the area to meet housing requirements. Revised housing land calculations across East Lothian are supplied in support of this position.

Rick Finc Associates on behalf of Hallam Land Management Ltd does not support the preferred approach to the cluster and is disappointed that land to the west of Prestonpans at Dolphingstone has not been identified as a preferred site. The green belt here is of limited value and the site is preferable to others nearby such as Goshen and will result in community benefits. Longniddry South is not a realistic alternative. The Cockenzie site would result in coalescence between Cockenzie and Port Seton (sic) and it is a historic battlefield.

Persimmon Homes believes there is an over-supply of economic land within East Lothian and this cluster. Believes the Council needs to provide more information on education aspirations and requirements.

APT Planning and Development on behalf of Wemyss and March Estate proposes Redhouse as a location for approximately 6 new homes plus 3 more in a steading conversion. This would enable investment in upkeep of Redhouse Castle.

Sir Frank Mears Associates and CKD Galbraith on behalf of Mr G. Lawson and Mr G. Wallace both request an amended settlement boundary for Seton Mains to include an area of land some 0.65 of a hectare within the settlement boundary of Seton Mains.

Gladman Developments Ltd does not support the 'reserving of capacity' within the Prestonpans education cluster for Blindwells, which Homes for Scotland believes is a constrained site. This results in a constraint on development in a location within the Strategic Development Area.

Cardross Asset Management Ltd supports the Cockenzie proposal as it is the largest brownfield opportunity in East Lothian. Careful consideration should be given to all potential uses. In terms of

education provision, the Scottish Government should provide grant assistance. The Council should be able to proceed with education infrastructure prior to 2019 and should not be reliant on developer contributions. New facilities could be located at Longniddry South.

Community Councils and local interest groups

Preston, Seton Gosford Area Partnership does not oppose allocation of Cockenzie Power Station for employment but believes scale and nature of employment are important. Employment land should not extend beyond current industrial boundaries. Diverse range of employment should be provided. Significant concern at environmental impacts of proposed extended pier.

Fa'side Area Partnership supports the retention of employment land at Cockenzie Power Station as it is vital to provide more jobs in the area.

Cockenzie and Port Seton Community Council supports use of Cockenzie Power Station and coal yard being used to create employment. Does not support development on areas outwith current footprint of power station, substation, and coal yard due to impacts on battlefield, coalescence, and open space and access routes. Seeks clarification on meaning of 'port related activity'. Would not support development south of Cockenzie and this should be designated Countryside Around Towns [as per Main Issues Report proposals]. More parking should be provided at Prestonpans station. New education facilities could be located at Longniddry South, or at St Joseph's.

Prestonpans Community Council supports the strategy of delivering existing housing land allocations. Does not believe Prestonpans is 'highly accessible'; will not continue to be if expansion allowed. Prestonpans has absorbed a lot of housing and this has not contributed to improvement in existing communities. In terms of education capacity, this should be reserved for Blindwells until it develops a viable roll. Objects to development around Bankton House (PM/PP/HSG030) and at Dolphingstone Farm (PM/MH/HSG008) [both sites assessed but not included in Main Issues Report].

Longniddry Community Council supports Blindwells as the preferred site for new development and opposes Longniddry South. There is insufficient infrastructure including roads, sewerage and drainage, restricted crossing points, a need to extend the station car park, lack of education capacity, poor community integration. Any development at Longniddry should be to the east of the village; this would be more accessible, closer to services, and would integrate better. In terms of education provision, this should be funded through developer contributions at the Blindwells development.

Gullane Area Community Council and Dirleton Village Association believe that development at Longniddry South could lead to coalescence with Blindwells. Adequate infrastructure would be required. In combination with development at Wallyford this would put strain on the road network, particularly A1 junctions, and upgrades would be needed.

Dunpender Community Council supports any proposal to provide employment in the Prestonpans/Cockenzie area. Areas of Prestonpans fall within the Index of Multiple Deprivation and this should be a Council priority.

Coastal Regeneration Alliance objects to the Cockenzie site primarily on the basis of loss of public open space, impacts on the battlefield, and in terms of overall scale and impacts on adjacent communities. Believes the Main Issues Report to be incorrect in relation to National Development status and National Planning Framework 3; this does not require reallocation of any land outwith the existing power station site for employment. The proposal is not justified by the National Renewables Infrastructure Plan nor the Council's assessment of need for employment sites.

Disappointed previous work by Coastal Regeneration Forum was not referenced in Main Issues Report. Urges Council to carry out further work on masterplanning the area, including community consultation and dialogue with site owners. Makes detailed comments on the site assessment for the site contained within the Interim Environmental Report, believing a number of scores should be more negative (suitability for proposed use, fit with strategic policy objectives, population, human health, cultural heritage, landscape). Also opposes development south of Cockenzie due to impacts on battlefield and coalescence [site assessed but not included within Main Issues Report].

Scottish Green Party East Lothian agree in principle with the Preferred Approach. Supports the need for local skills training facilities. Supports move away from low density suburban sprawl, mix of property types. Would like to see promotion of community-led developments and more provision for open space and active travel.

Old Craighall Tenants and Residents Association opposes both Cockenzie and Longniddry South sites. The coast should be preserved for the most part and land elsewhere used to build small numbers of houses.

Bolton Steading Residents Association supports the preferred approach but would like to see evidence of demand from industrial and commercial sectors.

Musselburgh Conservation Society is concerned at the impact of industrial development on the wider area, the battlefield, and on access to the coast. Accepts there is a shortage of employment on this side of Edinburgh but benefits must be offset against impacts. New housing should be the priority, with a range of small employment sites within strategic developments. There may be a better location for the potential energy hub elsewhere on the coast.

Rail Action Group, East of Scotland (RAGES) notes that Prestonpans station is outwith the town centre and a shuttle bus service could be run from the High Street to encourage rail use and help with lack of parking.

Association of East Lothian Day Centres notes there is no mention of special housing for the elderly. Supports development south of Cockenzie (PM/PP/HSG097) [site assessed but not included in Main Issues Report] but wonders whether there is conflict with energy-related proposals.

Members of the public

Opposition to PREF-P1 Cockenzie Power Station

The majority of responses on this cluster area (approx 100) were in the form of standard letters with similar content to the Coastal Regeneration Alliance response. These respondents object to the preferred Cockenzie employment site primarily on the basis of loss of public open space and footpaths, impacts on the battlefield, and in terms of overall scale and impacts on adjacent communities. They believe the Main Issues Report to be incorrect in relation to National Development status and National Planning Framework 3; this does not require reallocation of any land outwith the existing power station site for employment. The proposal is not justified by the National Renewables Infrastructure Plan nor the Council's assessment of need for employment sites. They also make detailed comments on the site assessment for the site contained within the Interim Environmental Report, believing a number of scores should be more negative (suitability for proposed use, fit with strategic policy objectives, population, human health, cultural heritage, landscape).

A number of other individual responses were also received objecting to the site, generally raising similar issues in terms of scale, lack of need, and impacts on the battlefield, open space, and amenity of local residents. In addition to the common concerns outlined above, other comments were:

- development should be restricted to power station and coal store footprint; should avoid open space and agricultural land; these should be retained as buffer between communities.
- Scottish Enterprise proposals would be better suited to other NRIP sites; Cockenzie has none of the assets required.
- proposals do not make most of opportunities of coastal location; there are alternatives that would regenerate area more sustainably; area should be developed as per Coastal Regeneration Forum report.
- local roads not designed for heavy vehicles adjacent to housing and schools; safety implications; re-routing or closing of vital road connecting towns
- impact on environment, wildlife, local businesses including fishing industry and tourism, house prices, core paths, historic sites, John Muir Way.
- harm to human health from removal of open space and harm to physical and mental health of existing residents by the industrialisation of the site.
- no demonstration of need for additional employment land; no evidence local jobs will be created; no need for site as existing energy park at Methil only half full; Torness would be a better location
- no reference to quay that would be needed to serve port related activity, and what this would involve
- testing of wind turbines would be required if they are manufactured on the site; this would be contrary to national guidelines as it is within 2km of communities.
- coalescence along coast from Edinburgh
- Council should discuss with Scottish Power a masterplan for site, or produce Development Framework with community engagement; this should be done soon so there is policy or guidance in place when the Council responds to a planning application
- difficult to comment until planning proposed
- to allocate land for this in the LDP is premature as the plan is under review
- the [consented] substation should be rejected and located on the former coal store area
- MIR has wrong boundaries on the proposed energy park – the council does not own the bund round the Persimmon development.

Support for PREF-P1 Cockenzie Power Station

A minority of responses regarding the employment proposals at Cockenzie were in support. The main points raised were:

- the site contains brownfield land
- redevelopment is a good idea
- it is close to population and infrastructure
- it will bring employment to the area
- would be a waste of resources to turn the site into a community facility with gardens etc. when new houses and industry would be required on unspoiled sites elsewhere
- would enhance community cohesion
- only deep water site suitable for major industry

Opposition to ALT-P2 Longniddry South

A number of responses were received in opposition to the Longniddry South alternative housing site. The most frequently raised issues were:

- lack of road and rail capacity
- the railway line is a barrier to community integration due to lack of connections across it
- scale of the proposals and impacts on the village character of Longniddry
- coalescence along the coast and/or with Blindwells
- impacts on agricultural land

Other points raised included:

- setting a precedent for more development south of the railway
- inappropriate to introduce businesses to mainly residential village
- lack of benefit to existing village
- impact on 'golf coast'
- need for new community and retail facilities
- the level of opposition would create a relationship between old and new parts of Longniddry 'tantamount to civil war'

Two respondents believed a smaller development to the east of the village within the Gosford estate would be better in terms of community cohesion and less unpopular.

Support for ALT-P2 Longniddry South

A number of responses were received in support of development at Longniddry South. A number of these referred to a development of 450 homes (rather than up to 1000). The reasons for support were:

- current housing in the village is too expensive, they rarely come up for sale
- need for more affordable homes in Longniddry and 'downsizing' opportunities
- opportunity for new amenities (shops/cafes) and office space for new businesses
- desirable/sensible place to build – good transport links, train quick and efficient compared to buses from elsewhere
- transport capacity increases would be needed regardless of where new homes are built
- development south of railway would not affect most residents
- site does not have to be integrated with Longniddry and would be developed as satellite of Blindwells
- Would be a logical school site

Opposition to other sites

The standard responses relating to Cockenzie power station (approx 100) also oppose development south of Cockenzie & Port Seton (PM/PP/HSG097) [site assessed but not included within Main Issues Report] largely due to impacts on the battlefield and coalescence. A number of other respondents also objected to this site. The objections raised to this site were:

- site is not suitable
- impacts on battlefield, listed buildings, archaeology, traffic, agricultural land, flooding and

subsidence.

- lack of need for more housing
- coalescence and loss of identity for Cockenzie/Port Seton
- noise from railway
- lack of foul drainage capacity
- little local employment – consequent commuting and traffic

Misc comments

- no more houses in Prestonpans
- Prestonpans has become a commuter town with no facilities to support new housing
- train is at capacity; road junctions a problem
- Lack of green space in Prestonpans. All green spaces being filled with housing
- The east and south of East Lothian should do its bit
- area has been industrialised for over 150 years
- infrastructure cannot cope with more development; health, police and education are at breaking point
- areas should be used for 'creating space'

Blindwells see also Q17 Blindwells

- Too large for the roads. Will cause congestion.
- Coalescence with Cockenzie/Port Seton
- Impact on Seton Castle designed landscape – mapping error and area should be excluded from development?
- Seeks designation of area around St Germain's that will make it impossible to build.
- Careful attention should be given to preserving key elements of battlefield.
- Name should be changed to Charlestoun or Riggonhead.

Education capacity issues

A number of responses were received in relation to funding and delivery of increased education capacity, and location of any new facilities. A majority of respondents on this issue believed this should be funded through developer contributions, and Blindwells was the preferred location of the majority. A range of other views were expressed:

- increasing capacity of current schools not viable given their locations
- Preston Lodge has capacity
- existing schools should be expanded with addition of blocks for particular faculties. Better for community cohesion
- there is a need to review catchments
- new facilities should be at Longniddry/Cockenzie
- new facilities should be as close as possible to where they are needed
- support for Longniddry split school concept
- Edinburgh should make a contribution (as the origin of housing demand)
- East Lothian Council should contribute for the children of people living and working here
- developer contributions should reflect overall costs ('roof tax' approach)

Other comments – misc

- opposed to development at Bankton steading due to impacts on listed building and battlefield [sites assessed but not included within Main issues Report]
- need to have variety of house types, reflecting local architectural styles.
- need to resolve transportation issues and avoid increased traffic in Musselburgh and Wallyford
- concern at loss of prime agricultural land
- should be a visitor centre for the Battle of Prestonpans
- too much housing built in area already

KEY MESSAGES

- Historic Scotland advise that impact on the Scheduled Monument at Cockenzie needs to be considered but can be mitigated;
- SEPA advises that a Flood Risk Assessment is required for Cockenzie Power Station site (PREF-P1) and Longniddry South (ALT-P2);
- SNH make comments on landscape and visual impacts of development of site PREF-P1 Cockenzie Power Station but that advise that impacts can be mitigated;
- Midlothian Council advise that utilising a rail access could reduce cumulative impacts of developments on road network;
- Significant level of opposition to Cockenzie Power Station site (PREF-P1) due to wide range of issues including loss of open space, impact on battlefield, overall scale and impact on communities;
- Some respondents do not oppose development on the footprint of the power station and coal store, and therefore some of the opposition appears to be based on assumptions around the scale and nature of any proposals;
- There is concern at the interpretation of National Planning Framework 3 – nations development status may not extend beyond thermal generation;
- A smaller number of respondents expressed support for PREF-P1 on the basis that it contains brownfield land and re-development is logical and/or could bring benefits;
- There were similar numbers of responses supporting and objecting to Longniddry South (ALT-P2) though a majority objected:
 - The main reasons for objecting were lack of integration, overall scale, transport capacity, coalescence, and agricultural land;
 - Those in support cited the need for affordable housing, transport infrastructure, and opportunities for benefits to the village.
- The table below indicates the views expressed in relation to particular sites.

Secondary school cluster area:		Prestonpans		
MIR reference	Site name	Support	Object	No opinion
PREF-P1	Cockenzie Power Station	31	131	11
ALT-P2	Longniddry South	21	26	21

Issue:	MIR Question:
Tranent Cluster	Question 13
Total number of responses on issue	102
Support preferred approach	32
Do not support preferred approach	25
Scottish Government key agencies and adjoining authorities	
<p><u>Historic Scotland</u> :</p> <ul style="list-style-type: none"> • PREF-T1 Bankpark Grove: This is identified as a preferred housing area, for up to 80 homes. Historic Scotland considers that this area makes a contribution towards the understanding of the battlefield landscape of Prestonpans inventory battlefield, as it is identified as the initial Jacobite line. Any development coming forward in this area should be designed to avoid adverse impacts on topography and the potential for archaeological remains. The site is also adjacent to and partially within Tranent Conservation Area. Historic Scotland considers that development should be designed to preserve or enhance the character of the conservation area, and should consider the setting of B listed buildings in the vicinity, in particular preserving the dominance of the parish church. They advise that the proposed masterplan recognise its setting in order to mitigate, as far as possible, the most significant impacts of new development. • PREF-T10 Elphinstone West: This preferred residential allocation is identified for 80 houses. Historic Scotland notes that there are some nearby Category C listed buildings. Where possible they recommend that consideration is given to their reuse in any proposed development. • PREF-T13 Woodhall Road (Pencaitland): This area, proposed for 16 houses, would be adjacent to a conservation area. Historic Scotland has previously provided advice to the council regarding potential impacts on conservation areas, and would be happy to discuss this further as assessment of this allocation. <p><u>Scottish Natural Heritage</u> has concerns over site PREF-T10 Elphinstone West due to landscape and visual impact and makes general comments on other sites. However through the use of site briefs or strategic design frameworks concerns can be addressed.</p> <p><u>Transport Scotland</u> advises that the trunk and local road network capacity is a cause for concern, particularly in the west of East Lothian. However they are working with ELC to identify solutions and funding methods to address these concerns.</p> <p><u>Midlothian Council</u> considers development in all clusters will have ‘downstream’ implications for Midlothian in terms of road traffic. Using sites with rail access may reduce cumulative impacts. Cumulative impacts should be modelled and used to define required upgrades and secure developer contributions.</p> <p><u>Sportscotland</u> is a statutory consultee where certain outdoor sports facilities may be lost. Therefore any proposals that would result in the loss of outdoor sports facilities would be subject to mitigation/solutions being found for the loss of those sports pitches.</p> <p><u>Scottish Water</u> has no preference for particular sites and will support development in line with its responsibilities.</p>	

National Interest Groups

Homes for Scotland believes there is a shortfall in the proposed supply of housing that has implications for the Proposed Plan. The Council should review the approach to decisions on windfall sites to maximise housing delivery in the short to medium term.

Network Rail seven sites are proposed in the cluster yielding approx 1112 homes. These sites will have an impact on Prestonpans Station which is located to the north of Tranent. The existing station car park has limited parking and would benefit from appropriate enhancements.

The Coal Authority supports the requirement to consider ground conditions and mitigation methods.

Internal Consultees

ELC Countryside believes the Green Network in the cluster needs to be emphasised, in particular infrastructure for active travel on a cluster and more strategic basis.

Landowners, developers and agents

Scott Hobbs Planning on behalf of Scottish Power Energy Network believes that to comply with National Planning Framework 3 the Area of Coordinated Action must be addressed which will require coordination between cluster areas.

G Keir on behalf of Highland Properties support site Pref-T10 Elphinstone West: reaffirm commitment to the delivery of attractive and sustainable housing for Elphinstone and supply information to demonstrate that the site is effective and deliverable within the required timescales.

G L Hearn on behalf of Co-op Group support ALT –T5 Tranent East and ALT-T6 Kingslaw and seek the re-allocation of the Co-op Group land on the eastern edge of Tranent from Employment (ref BUS11 in the 2008 adopted Local Plan) to Housing or Housing/Employment uses. Support the allocation of Reasonable Alternative sites ALT-T5 Tranent East & ALT-T6 Kingslaw sites. Object in whole or in part, to the currently Preferred sites at Tranent.

Gladman Developments Ltd supports the preferred approach. In particular they promote site (PREF-T14) at Lempockwells Road, Pencaitland. Gladman as the promoter for this site give assurances that this site can be delivered in the anticipated timeframe, if not before.

Walker Group (Scotland) Ltd supports the preferred approach. Oppose sites M11 Dolphinstone, ALT-T5 Tranent East, ALT-T 6 Kingslaw & ALT-T 7 Tranent Main. Support of site PREF-T1 Windygoul South, PREF-T12 Tynemount East and PREF-T11 Tynemount West and consider that these allocations are both viable and deliverable within the strategic timescales of the Plan. In particular, PREF-T4 Windygoul South is in a unique location to ensure the delivery of any future expansion southwards of Windygoul Primary School.

Roy Mitchell Design Limited (RMDL) believes the relationship of the 2 sites PREF-T3 Southwest Windygoul and PREF-T4 Windygoul South requires further consideration. The most appropriate location for employment land would be directly adjacent to the existing industrial site located to the south of the proposed PREF-T4 Windygoul South site where residential development would be constrained to some extent by the existing industrial use and vice versa. The employment land allocation should be relocated to the southern part of the central section of the Site PREF-T4 Windygoul South site.

Persimmon Homes support sites PREF- T2 Lammermoor Terrace, PREF-T3 & T4 Windygoul South. Oppose sites PREF - T1 Bankpark Grove, Pref-T10 Elphinstone West, PREF-T11 Tynemount West PREF-T12 Tynemount East, PREF-T13 Woodhall Road, PREF-T14 Lempockwells Road, ALT-T5 Tranent East & ALT-T7 Tranent Mains. Do not consider it prudent to support sites within the Tranent cluster which are outwith the town of Tranent, on the basis there are education capacity issues within the area both at primary and secondary level, especially those which fall outwith the core development area. However we do support our own site at Lammermoor, and the Walker site at Windygoul as it provides the necessary education solution for Tranent. Believe there is an over-sufficient supply of economic land within East Lothian and within this Cluster area. Please refer to our answer to Question 5 for further details.

PPCA on behalf of Aithrie Estates does not agree with the preferred strategy for new economic development and housing opportunities in the Tranent cluster insofar as it relates to Glenkinchie and the non-allocation of land for residential development within the village. Objects to the Council's 'Not Preferred' status and the non-allocation of the sites promoted by Aithrie Estates for residential development in the emerging Local Development Plan.

PPCA on behalf of The Leadhills Trust does not agree with the preferred strategy for new economic development and housing opportunities in the Tranent cluster insofar as it relates to Ormiston and the non-allocation of land for residential development to the north at Puddle Wood (PM/TT/HSG023). Also promotes another site to the north west of Limeylands Road for residential development.

Geddes Consulting on behalf of Hamilton & Kinneil Estates believes further sites will be required in the cluster to assist in meeting the SESplan housing land requirement. Promoting site in ownership of client known as Dryden Field (Site Ref: PM/TT/HSG012 – extending to 4.0 ha). This was promoted for 50 homes. The Estate now wishes to promote this site for housing on 4.3 ha and to use part of the site for private housing as enabling development to secure private rented housing for the Estate as well as meeting local affordable housing needs. In addition, a substantial wood on 6.4 ha would be planted to the east of the housing proposal. The overall site area now extends to 10.7 ha.

John Handley on behalf of the landowner J&W Jenkinson do not agree with the preferred strategy for housing growth in the Tranent Cluster insofar as it relates to Gladsmuir and wish to object to the non-allocation of client's site at Lamington Road, Gladsmuir (MIR Site Refs: PM/TT/HSG045 & PM/TT/HSG0890 which were assessed but not included in MIR) for residential development.

Clarendon Planning & Developments on behalf of Barratt David Wilson Homes does not support the Preferred Approach as it will fail to deliver sufficient housing to meet requirements of SESplan. Oppose proposed phasing (pre-2019) of Windygoul South and Tynemount West, Ormiston as both sites should be moved to post 2019 period. ELC need to set out a planned programme of school extensions to facilitate growth. Promote site at Limeylands Road Ormiston for inclusion as a housing allocation within the LDP.

Clarendon Planning & Developments do not support the Preferred Approach within Tranent cluster as it will fail to deliver sufficient housing to meet requirements of SESplan . Promotes site at Hillview Road Ormiston for 50 units of housing. Information supplied in supporting documentation.

Mansell Homes on behalf of Balfour Beatty supports PREF – T8 Macmerry as an appropriate location for new residential development within the Tranent Cluster in order to meet relevant SESplan and emerging Local Development Plan housing requirements.

Messrs R and A Kennedy, supports site ALT–T5 Tranent East for residential and related development as it represents a logical and deliverable development option within Tranent. Not only are these sites closer to the town centre than the preferred site at Windygoul South (PREF-T4), development at East Tranent is the only option that provides direct transportation and air quality benefits to the town as a direct result of the sections of the eastern and southern By-pass of the High Street that could be delivered. The proposals can also address education issues arising from the development.

George White on behalf of MR M Steven agrees with the Preferred Approach for the Tranent cluster. To ensure that enough homes, which provide a wide range and choice of dwellings are provided within the plan period further sites should be allocated in the Strategic Development Areas (SDAs), such as Macmerry, in line with the SESplan. Our Client supports the preferred allocated economic development land in the Tranent cluster, especially that in Macmerry PREF-T8 but that an additional area of land be added to this allocation.

George F White on behalf of Mr D Lockie – promotes land to the southwest of Macmerry for residential development.

Ryden on behalf of the Archdiocese of St Andrews and Edinburgh –Request a review of Policy ENV13 and to amend that policy to support residential development at the former St Joseph’s school for housing.

Andrew McCafferty on behalf of Omnivale Ltd – Promotes sites on the east and west sides of Tranent Cemetery (SDP/TT/HSG005 site A, SDP/TT/HSG005 site B & SDP/TT/HSG005 site C) for housing and a care home [sites assessed but not included in MIR].

New Sites:

Housing

Blindwells Expansion South of A1 - TMS Planning on behalf of Roy Mitchell Design Ltd
MIR/TT/HSG0128

Land south of Greendykes Farm – George F White on behalf of M Steven –
MIR/TT/HSG0128

Land to south of Westbank Road – Macmerry – George F White –
MIR/TT/HSG119

Hillview Road Ormiston – Clarendon Planning on behalf of David Slight
MIR/TT/HSG132

Land to the northwest of Limeylands Road – PPCA on behalf of Leadhills Trust

Other Uses

Blindwells Expansion South of A1 – TMS Planning on behalf of Roy Mitchell Design Ltd
MIR/TT/OTH016

Blindwells Expansion South of A1 – TMS Planning on behalf of Roy Mitchell Design Ltd
MIR/TT/OTH017

Mineral Extraction:

Land at Wester Pencaitland (Winton Estate) MIR/TT/MIN0010

Land at Easter Pencaitland (Winton Estate) MIR/TT/MIN0010

Community Councils and local interest groups

Ormiston Community Council supports the preferred sites of Tynemount Farm West PREF-T11 and East PREF-T12 would represent the maximum appropriate expansion for the village. Beyond this, potential developments would have a number significant impacts: the established character and scale of this historic planned village and its setting would be adversely affected by encroachment of housing around the historic core and Conservation Area; the loss of prime agricultural land is a concern; the increase in vehicular traffic through Ormiston would have a negative impact on the area; Ormiston Primary School is at maximum capacity and while a small extension may be possible it would meet only a small increase in pupil numbers; Concerns about the reduction in the open green space between Ormiston and Tranent that contributes to the separate identities of the settlements; We would hope that, when developing the strategy for traffic reduction through Tranent such as an eastern bypass, a similar integrated approach could be taken for Ormiston where heavy peak traffic currently passes through this small village immediately outside the Primary School and though the residential Main Street.

Humbie, East and West Saltoun and Bolton Community Council understands sites IER Ref: PM/TT/HSG061 and PM/TT/HSG063 [sites assessed but not included in MIR] in Humbie have been withdrawn by the landowner: there is no support for developing these sites or redrawing the village boundary as may now be suggested. The Community Council also ran a consultation event and believes an education catchment review is required; There should be no major development in the village – i.e. no more than three or four new houses annually; Limited new housing in Humbie was supported because of its potential contribution to the viability of the school, to the Humbie Hub and in the hope that it might increase the likelihood of public transport. The almost unanimous desire was at most a doubling of the number of houses in the village over the next ten years; There was little opposition to one-off houses in the fringes of the village, provided they were sympathetic in style and on reasonable sized plots. Individual in-fill housing was also deemed acceptable – but not on plots as inappropriate as that adjacent to the Humbie Hub.

Pencaitland Community Council have issues with large housing developments which lack a holistic plan for how they would integrate with and enhance the overall amenity for all residents; the land designated for housing off Pencaitland's Lempockwells Road (site ref PREF- T14) would give cause for concern if it were to be one large development; Inclusion of a percentage of development land (for example 1 in every 10 houses) set aside for self build projects where the developer provides necessary inclusion of services and drainage as part of any planning permission was supported; A commitment from a future developer to set aside an area (or areas) to provide for both leisure/recreational space and equipment; want there to be consideration for the effects of development on existing residents with the objective of ensuring that there is a good separation between any new development and current housing; inclusion of footpaths which link in to existing routes and encourages walking and cycling to encourage green travel rather than using the car for short distances; support proposed site at Woodhall Road (site ref PREF T13) in Pencaitland; objects to site IER ref: PM/TT/HSG092 [site assessed but not included in MIR] New Winton as site lies outside village envelope and is objected to by majority of residents; the site is not logical in landscape terms due to lack of natural boundary; it would lead to pressure for further development.

Garvald & Morham Community Council notes site assessment for Garvald Glebe PM/HN/HSG020 is poor and concurs with analysis principally due to lack of access and site issues. [site assessed but not included in MIR].

The Fa'side Area Partnership is split on the issue of Compact vs. Dispersed Growth and recognises a number of arguments both for and against the preferred strategy: As a 'happy medium' the Fa'side

Area Partnership suggests a hybrid approach whereby sites such as Haddington and Drem alleviate some of the density of the Compact strategy without necessitating dispersal of housing across the whole county.

Tranent and Elphinstone Community Action Plan Working Group believes the dramatically increasing population has already impacted the town with comments including: - “Many incomers to Tranent don’t use the local facilities or shops”-“ Tranent is in danger of losing its character and community spirit” –“ People are not interested in the place, just use it as a “dormitory” for Edinburgh “- “Pressure on services – health, schools, roads, leisure facilities – for example, the Health Centre has had an additional 1,000 patients signed up since 2009.”

East Tranent Residents Society strongly support and commend the findings of the MIR report and decision to list the sites to the east of Tranent as Reasonable Alternative sites and not as Preferred Options. The Reasonable Alternative sites proposed would have a detrimental effect on Tranent as a whole and undermine the ability of ELC to deliver the new settlement at Blindwells.

Scottish Green Party East Lothian believes there is a need to allocate for land for local skills training facilities as the current need to travel to Edinburgh or beyond for this is a major barrier for many young people, particularly from rural areas. Would like to see a move away from low-density suburban sprawl towards active promotion of alternative models of development including high density low rise development, provided it is of high quality in terms of design and construction and provides a balanced mix of property types to encourage a diversity of households. Would also like to see active support and promotion of community led developments such as co-housing and support for provision of self build opportunities, including through use of community land trusts.

Coastal Regeneration Alliance believes concentrating development in the west of the County risks removing much of the public and amenity land for the existing communities. The concentration of large scale housing development is incompatible with the creation of large industrial sites between Cockenzie, Prestonpans and Tranent. Heavy industrial manufacturing, servicing and energy uses not compatible with the dense residential strategy proposed or with the rural residential nature of the area.

Recharge Youth and Community Facility believes there would be increased demand on Community Facilities which are currently oversubscribed and are currently very limited to what can be offered due to lack of community venues.

Rail Action Group, East of Scotland think it unlikely that residents in Tranent would want to use a rail service to Edinburgh as there is no direct link and there are reasonable bus services. Since Lothian Buses came back to East Lothian, they have provided a good, cheap service.

Comments from members of the public

Comments from public about sites in Tranent

PREF-T1 Bankpark Grove
PREF-T2 Lammermoor Terrace
PREF-T3 Southwest Windygoul
PREF-T4 Windygoul South

ALT- T5 Tranent East
ALT- T6 Kingslaw

Alt- T7 Tranent Mains

- Growth in population of Tranent has not been matched by a growth in services or facilities – education, health and transport;
- Incomers to Tranent do not use local facilities and it is becoming a satellite town;
- Tranent in danger of losing its identity and character;
- Insufficient education capacity and lack of nursery facilities;
- Constant building on school sites detrimental to children's education;
- Loss of outdoor space;
- Long periods of disruption caused by development;
- Impact on water quality;
- Displacement of wildlife;
- Building on prime agricultural land;
- Improvement to High Street needed;
- Lammermoor Terrace PREF-T2 & Bankpark Grove PREF-T1 proposals will add problems to the A199;
- Building at Bankpark Grove PREF-T1 would undermine the buffer between Tranent and Prestonpans;
- PREF-T 3 (Southwest Windygoul) Highly visible site and would be an eyesore;
- Poor public transport links;
- Increase in traffic in an already congested area;
- reduce access to the countryside;

Comments from public about sites in Macmerry

PREF-T8 Macmerry North

PREF-T9 East Macmerry Industrial Estate

- water capacity is not confirmed for Macmerry in the information provided;
- No mention of additional health care requirements ;
- Significant traffic modelling is required if the Macmerry North possibility is to be considered any further;
- Education capacity;

Comments from public about sites in Elphinstone

PREF-T10 Elphinstone West

- Not appropriate to add 80 homes to a small village because this is excessive and there should be only be 20 or 30 new homes;
- Coalescence of Tranent and Elphinstone;
- Poorly located;
- Poor public transport links;
- Physical infrastructure already unable to cope;
- Road safety and impact on road network;
- Noise and privacy issues created by new houses;
- Not sufficient education capacity;
- Building on prime agricultural greenfield land ;
- Unnecessary development;
- Topography not suitable;

- Poor drainage;
- Sheltered housing would be appropriate (last census 63% of population were elderly);

Comments from public about sites in Ormiston

PREF-T11 Tynemount West

PREF-T12 Tynemount East

No specific comments.

Comments from public about sites in Pencaitland

PREF-T13 Woodhall Road

PREF-T14 Lempockwells Road

- Impact of large development at Lempockwells PREF-T14 would undermine the character of Pencaitland and its conservation area ;
- Impact on archaeological remains if site PRERF-T13 Woodhall Road developed;
- Breaching robust southern boundary which could set precedent for future expansion ;
- Erosion of green belt;
- Building on prime agricultural land should build on brownfield sites;
- Increase traffic and road safety implications – existing road network poor;
- Vehicular access via Lempockwells Road is poor;
- Poor public transport links;
- Not most accessible or sustainable location;
- Insufficient education capacity;
- Strain on village infrastructure;
- Within coal mining development area;
- Loss of privacy for existing residents;
- Development of site PREF-T14 Lempockwells would ruin views of Lammer Law;

Comments from public about sites at Dolphingstone

M11 - Building on greenbelt land unacceptable;

Education:

- It will be a matter for the Council to ensure that the developers of all contributing sites, agree on their share of the required contribution to education infrastructure, having regard to the scale of their respective developments, to the value of any land contribution and to any other housing that may come forward within the school catchment areas, in accordance with Circular 3/2012: Planning Obligations;.
- Given East Lothian Council are the only people who can tell the developers what will be required, they should also be telling developers how they want to achieve it, rather than leaving it as an open ended question with no obvious answer;
- East Lothian Council must set out a planned programme of school extensions to facilitate growth with further detailed investigation of Council borrowing for up-front costs;
- Extensions to existing schools where appropriate and new schools built where there is not capacity/space to build extensions.

KEY MESSAGES

- Historic Scotland advises that PREF-T1 Bankpark Grove will need to be designed to safeguard the setting of the Prestonpans inventory battlefield site and Tranent Conservation Area;
- SportsScotland raise concerns regarding loss of sports pitches through school expansion;
- Scottish Natural Heritage – has concerns over PREF-T10 Elphinstone West due to landscape and visual impact and makes general comments on other sites. However concerns can be addressed through the use of site briefs or strategic design frameworks;
- Transport Scotland: concerned about the road network capacity, particularly in the west of East Lothian. However they are working with ELC to identify solutions and funding methods to address these concerns;
- Concern from developers that neither approach will deliver sufficient housing completions to meet SESplan requirements;
- Support from landowners/developers for their particular sites and opposition to other sites;
- Midlothian Council advise that the trunk and local road network capacity a concern, particularly in the west of East Lothian. However they are working with ELC to identify solutions and funding methods to address these concerns. Suggest the use of sites with rail or potential rail access may be beneficial in reducing cumulative impacts;
- Concern from local community about:
 - Loss of identity of towns/villages;
 - Impact on road network;
 - Insufficient education capacity;
 - Building on prime agricultural land;
 - Poor public transport links.
- The table below indicates the views expressed in relation to particular sites.

Secondary school cluster area:		Tranent		
MIR reference	Site name	Support	Object	No opinion
PREF-T1	Bankpark Grove	12	8	24
PREF-T2	Lammermoor Terrace	12	5	25
PREF-T3	Southwest Windygoul	14	10	21
PREF-T4	Windygoul South	14	16	18
ALT-T5	Tranent East	8	9	27
ALT-T6	Kingslaw	10	4	29
ALT-T7	Tranent Mains	9	7	27
PREF-T8	Macmerry North	16	4	24
PREF-T9	East Macmerry Industrial Estate	19	5	23
PREF-T10	Elphinstone West	11	11	21
PREF-T11	Tynemount West (Ormiston)	14	7	21
PREF-T12	Tynemount East (Ormiston)	16	4	22
PREF-T13	Woodhall Road (P'land)	11	3	25
PREF-T14	Lempockwells Road (P'land)	8	8	27

Issue: Haddington Cluster	MIR question: Question 14
Total number of responses on issue	73
Support preferred approach	31
Do not support preferred approach	13
Scottish Government key agencies and adjoining authorities	
<p><u>Historic Scotland</u> advise that there is potential for some development at OTH-H7 Dovecot however consideration needs to be given to heritage assets in the vicinity including nearby listed buildings, Lennoxlove Inventory Garden and Designed Landscape.</p> <p><u>Sportscotland</u> is a statutory consultee where certain outdoor sports facilities may be lost. The possible expansion of Knox Academy would result in the loss of sports pitches. Therefore these plans would be subject to mitigation/solutions being found for the loss of those sports pitches.</p> <p><u>Transport Scotland</u> advises that the trunk and local road network capacity is a concern, particularly in the west of East Lothian. However they are working with ELC to identify solutions and funding methods to address these concerns.</p> <p><u>Scottish Natural Heritage</u> has concerns over PREF-5 Harperdean particularly due to landscape and visual impacts. However advise these could be resolved if the elevated parts of that site remain unallocated or retained as open space. Whilst other sites do raise some landscape and visual issues they advise that these could be mitigated using site briefs or strategic design frameworks and provide detailed advice on these.</p> <p><u>Midlothian Council</u> considers development in all clusters will have 'downstream' implications for Midlothian in terms of road traffic. Using sites with rail access may reduce cumulative impacts. Cumulative impacts should be modelled and used to define required upgrades and secure developer contributions.</p> <p><u>Scottish Water</u> has no preference for particular sites and will support development in line with its responsibilities.</p>	
National Interest Organisations:	
<p><u>Coal Authority</u> supports the requirement to consider ground conditions and methods of mitigation.</p> <p><u>Homes For Scotland</u> believes there is a shortfall in the proposed supply of housing that has implications for the Proposed Plan. The Council should review the approach to decisions on windfall sites to maximise housing delivery in the short to medium term.</p>	
Internal Consultees	
<p><u>ELC Countryside</u> believes the Green Network in the cluster needs to be emphasised, in particular infrastructure for active travel on a cluster and more strategic basis. The potential to create a cycle path from the Letham/Dovecot developments to the Knox Academy to reduce road traffic should be explored.</p>	

Landowners, developers and agents

Persimmon Homes have some concerns over the large number of sites which may come on stream at once, which could end up with every major house builder delivering units within Haddington within same time frame. Sites need to be phased to address this. New primary school at Letham should be delivered in such a way it can be utilised by future developments and accommodate future growth. Have concerns about lack of suitable sites which has limited development potential in the cluster area. Believes that there is an over sufficient supply of economic land within East Lothian and within this Cluster area.

Geddes Consulting on behalf of Hallam Land believes further housing sites will be required in the area to meet housing requirements of SESplan. Promotes the principle of allocation of other smaller sites in sustainable locations in Haddington. Believes this would be a more realistic development strategy than depending on additional housing at Letham Mains PREF-H2 beyond its allocated capacity (810 homes). Support for OTH-H7 at Dovecot for 80 homes.

APT Planning & Development Ltd on behalf of Cruden Homes East believes further housing sites will be required in the area to meet housing requirements of SESplan. Promotes site OTH-H6 Amisfield to the east of Haddington to be included as an allocated site to deliver up to 500 new homes. They have significant concerns over the ability of the preferred approach to deliver a sufficient number of new homes for East Lothian within the stated timescales.

Farningham Planning Ltd on behalf of Lord Wemyss Trust: Promotes 27.2ha of land at OTH-H6 Amisfield Mains for housing.

Colliers on behalf of Taylor Wimpey and Mactaggart and Mickel believes further housing sites will be required in the area to meet housing requirements of SESplan. Support site PREF-H2 at Letham and also make representations in support of OTH-H8 West Letham which were all assessed but not put forward in MIR as preferred or Reasonable Alternative sites. Also support an amendment is made to PREF-H3 Gateside East to increase the amount of employment land allocated there. Also advised that if the proposed new primary school at Letham takes pupils from a wider catchment area than Letham then there would be a need for a catchment review.

Scott Hobbs Planning Ltd on behalf of In-Site Property Solutions supports site PREF-H5 Peppercraig Quarry but with reservations. The promotion of PREF-H3 (Gateside East) in the MIR for mixed use housing and economic development is inappropriate and should be amended to give clearer guidance on type of land use and development which would be allowed. Believes there is no demand for Class 4,5 or 6 uses. Considers that the approach in the MIR should be amended to allow a wider range of mixed uses including: Residential (Class 9), Hotels and Hostels (Class 7); Residential Institutions (Class 8); Non Residential Institutions (Class 10) and Business (Class 4).

GVA James Barr on behalf of Ediston Real Estate & also J&W Jenkinson supports PREF-H5 Peppercraig Quarry and, its inclusion within the boundary of Haddington and the promotion of the site for employment, leisure, hotel, tourism and retail.

TMS Planning and Development Services Ltd on behalf of R and A Kennedy promotes development of a retirement village at Monkrigg Road, Haddington IER ref: PM/HN/HSG065. [site assessed but not included in MIR].

Chalmers & Co believes the proposal for 1400 additional homes and only 8ha of employment ground seems out of balance with the stated need to reduce the outmigration of the county's workforce. If

Haddington is called to accommodate so many new homes, what does Haddington get in return other than a contribution towards education? Support reopening of the railway to Haddington?

New Site

Rick Finc Associates on behalf of landowners of site named 4FD at Letham Mains holdings believe it is doubtful that the required number of housing units will be completed within the required timeframe. To address this they promote a site at Letham Mains Holdings (4FD which is adjacent to west side of site PREF-H2) for housing. Provides information on site.

Internal Consultees

ELC Countryside believes developers may shy away from contributing towards a primary school and other infrastructure if they are not sure they will be able to sell all the housing allocation. Should provide infrastructure for active Green Travel.

Community Councils and local interest groups

Haddington and District Community Council support the Preferred Approach as this will retain Haddington's rural/Market town character. Also believe that the infrastructure in Haddington needs to be improved prior to the approval of any further large scale developments.

Garvald and Morham Community Council concur with the MIR analysis that the proposal at Garvald Glebe is very poor due to lack of road access and site issues. If consideration is given to any future development derelict buildings should be considered first before green field sites. Better broadband connection and access to mobile networks would greatly benefit local business and people working from home. Opposition to development of site PM/HN/HSG020 at Garvald Glebe for housing [site assessed but not included in MIR]; Agreement with findings of site assessment;

Humbie Community Council support the Preferred approach. Suggest that provision is made for a Park and Ride facility at the west of Haddington. Current links between Pencaitland Road and the A188 are unsuitable for high volumes of traffic.

Bolton Steading Residents Association believes the inherent infrastructure and planning constraints around Haddington would mitigate against delivery of the 1,400 homes target within the ten year timescale.

Haddington and District Amenity Society (HADAS) support the preferred approach to housing, but would not support in full the employment sites. Gateside East is suitable for development, but the design quality, appearance, scale and nature of that development should be considered more closely. Large scale units and development could have a detrimental impact on the setting of and the character of the town. Believes there is uncertainty around the delivery of the allocated Letham site. Until measures are put in place to unlock the site it is essential that no further sites should be considered suitable on the western side of the town. The delivery of the retail development at Gateside West should be clarified as alternative uses (possibly including housing) could also be considered. The whole settlement area rather than specific sites should be considered. The importance of recognising, protecting and locating specific facilities as well as taking into account the setting and landscape features so important to Haddington.

Haddington and Lammermuir Area Partnership believes new housing and employments should not draw people away from the town centre. The importance of recognising, protecting and locating

specific facilities as well as taking into account the setting and landscape features is so important to Haddington. The reasonable alternative housing sites are not supported. Further housing at Dovecot Farm would have a detrimental impact on the Clerkington Estate's designed landscape. Need connectivity between sites and to key attractions in town. Contributions from developers to make the town centre a more attractive pedestrian destination. Would like to propose that the High School cluster boundaries in the area are re-assessed with a view to aligning them along the ward boundaries.

Rail Action Group East Of Scotland (RAGES) believes Haddington residents have reasonably frequent bus services but a trial of a bus link to the station at Wallyford was not well supported. It is not known whether residents would support the reinstatement of the rail line. Haddington Town Centre has parking difficulties because of long stay commuters' cars and residents' parking on the main streets. An influx of new housing without planned transport links would only add to this.

Scottish Green Party East Lothian supports the need for land for local skills training facilities as the current need to travel to Edinburgh or beyond is a major barrier for many young people, particularly from rural areas. Support a move away from low-density suburban sprawl towards active promotion of alternative models of development including high density low rise development, provided it is of high quality in terms of design and construction and provides a balanced mix of property types to encourage a diversity of households. We would also like to see active support and promotion of community led developments such as co-housing and support for provision of self build opportunities, including through use of community land trusts. All developments must require provision of open space for community gardens and allotments as well as wildlife corridors. Street and open spaces should be designed to encourage informal social interaction and active travel.

Members of the public

- Support for Preferred Approach;
- New development should be directed to most sustainable locations;
- Need to insure schools and roads infrastructure is capable of coping with growth;
- Impact of new development on town centre;
- Need to provide good active travel routes form the development areas to the town centre and schools;
- Significant increase in housing would alter character of Haddington;
- Concern over development of OTH-H6 Amisfield as it is an ancient parkland and should be kept for future generations to enjoy;
- Sites OTH-H6 Amisfield and OTH-H7 Dovecot are both too far from transport network and schools. Infrastructure not in place to support movement of residents from these sites;
- Sites OTH-H6 Amisfield and OTH-H7 Dovecot both on floodplain and would significantly extend Haddington into areas of open countryside;
- Concern about building on prime agricultural land;
- Opposition to development of land to the east of Gifford for affordable housing IER ref: PM/HN/HSG103 [site assessed but not included in MIR];
- Demand for housing is closer to Edinburgh and should be located closer to there;
- New housing needs to be close to rail links;
- Priority should be given to developing Blindwells;
- Need improvements to transport infrastructure such as a rail link;
- Should be no further development until Letham Mains completes;
- Linked new settlements along the A1 corridor from Amisfield to Beanston and beyond would be more appropriate to develop than to extend Haddington;
- Opposition to development of site PM/HN/HSG020 at Garvald Glebe for housing [site

assessed but not included in MIR]; Agreement with findings of site assessment;

Education

- Costs shared between developer and local authority;
- New primary provision made available for whole town and not restricted to areas of new development;
- New school delivered in such a way it can be utilised by future developments.

Key Messages

- **Historic Scotland stress the need to safeguard historical assets around OTH-H7 Dovecot;**
- **Sportscotland raise concerns regarding loss of sports pitches through school expansion;**
- **Transport Scotland: concerned about the road network capacity, particularly in the west of East Lothian. However they are working with ELC to identify solutions and funding methods to address these concerns;**
- **Scottish Natural Heritage raises concerns about the development of PREF-5 Harperdean particularly with regards to visual impacts on the landscape . However these could be mitigated through a design framework;**
- **Midlothian Council advise that the trunk and local road network capacity a concern, particularly in the west of East Lothian. However they are working with ELC to identify solutions and funding methods to address these concerns;**
- **Developers are concerned that there would be difficulties with either approach to meet SESplan housing requirement;**
- **Support for Preferred Approach from both developers and public;**
- **Opposition from public of Reasonable Alternative Approach;**
- **Demand for housing closer to Edinburgh;**
- **Concern about ability of schools and infrastructure to cope with growth;**
- **Concern about scale of growth on character of Haddington;**
- **Opposition to development at Amisfield and Dovecot;**
- **Need improvements in public transport links;**
- **New primary school should serve Letham and wider area;**
- **The table below indicates the views expressed in relation to particular sites.**

Secondary school cluster area:		Haddington		
MIR reference	Site name	Support	Object	No opinion
PREF-H1	Dovecot	12	9	10
PREF-H2	Letham Mains	16	6	9
PREF-H3	Gateside East	18	4	10
PREF-H4	Alderston	14	8	9
PREF H5	Peppercraig Quarry	19	5	11
OTH-H6	Amisfield	7	14	12
OTH-H7	Dovecot	5	16	10
OTH-H8	West Letham	10	12	10

Issue:	MIR question:
Dunbar Cluster	Question 15
Total number of responses on issue	95
Support preferred approach	39
Do not support preferred approach	16
Scottish Government key agencies and adjoining authorities	
<p><u>Historic Scotland</u>: need to safeguard historical assets and in particular:</p> <ul style="list-style-type: none"> • East Linton Auction Mart and its setting and ensure its reused within any new development; • Impacts on Stenton and East Linton conservation areas; • With regards the ALT-D1 site at Eweford the impact on the sites and settings of two scheduled monuments (Eweford Cottages, enclosure and ring ditches ESE of (SM 5835), and Thistly Cross, enclosure 200m E of (SM 5832)). Development may be possible in the majority of the allocated area, but the Council should provide a robust design strategy to avoid impacts on the monuments and their settings in accordance with national and local policy; • There are a large number of designated heritage assets in the identified East Linton Expansion Area of Search area, and impacts on setting will need to be considered in earliest design phases. The scheduled monument known as Markle, settlement and laird's house (SM 6680) is within the search area, and impacts upon its setting should be considered in identifying potential areas for development. In particular, the monument has long views towards North Berwick Law, and intrusion into these should be avoided. Particular consideration should be given to the setting of the category A listed buildings within the search area, and any inter-relationships between these and other buildings, which could be impacted by intervening development. <p><u>Transport Scotland</u> advises that the trunk and local road network capacity is a concern, particularly in the west of East Lothian. However they are working with ELC to identify solutions and funding methods to address these concerns.</p> <p><u>Scottish Natural Heritage</u> has concerns over PREF-D5 Newtonlees North and PREF-D6 Newtonlees South due to landscape and visual impacts. Believe OTH-D8 East Linton Expansion Area of Search would be preferable from a landscape and visual point of view. Whilst other sites do raise some landscape and visual issues they advise that these could be mitigated using site briefs or strategic design frameworks and provide detailed advice on these.</p> <p><u>Sportscotland</u> is a statutory consultee where certain outdoor sports facilities may be lost. The possible expansion of Dunbar Grammar School to accommodate additional pupils generated by the proposed housing in the cluster would result in the loss of sports pitches. Therefore these plans would be subject to mitigation/solutions being found for the loss of those sports pitches.</p> <p><u>Midlothian Council</u> considers that development in all clusters will have 'downstream' implications for Midlothian in terms of road traffic. Using sites with rail access may reduce cumulative impacts. Cumulative impacts should be modelled and used to define required upgrades and secure developer contributions.</p>	

National Interest groups

Office for Nuclear Regulation(ONR) has no objection to the principle of residential development at, site reference– PREF-D12 Innerwick East and ALT-D11 Innerwick West – but would wish to be consulted regarding any future planning applications relating to them.

Homes for Scotland believes there is a shortfall in the proposed supply of housing that has implications for the Proposed Plan. The Council should review the approach to decisions on windfall sites to maximise housing delivery in the short to medium term.

Network Rail advises that to date Scottish Government has made no commitment to the provision / funding of a rail halt at East Linton.

The Coal Authority supports the requirement to consider ground conditions and methods of mitigation.

Royal Society for the Protection of Birds (RSPB) The proposal to reinstate the train halt/station at East Linton should be a priority. This will potentially lead to considerable reduction in private vehicle use and a drop in carbon emissions

Landowners Developers and agents

National Trust For Scotland feel it would be inappropriate to develop any land within the area of search at East Linton OTH-D8 to the north and east of Preston. We would encourage a Countryside Around Town designation which extends to the north and east of that drawn at present and would be happy to help draw an improved boundary. Without this the historic milling landscape around the Trust's Preston Mill will be lost and the character of the area diminished. Any development on the Tyne floodplain would be inappropriate for environmental reasons.

Viridor supports the intention of seeking to co-locate or link heat producers and users where ever practicable and possible; and, the encouragement of CHP facilities to serve both existing and new development sites in the Plan area particularly in relation to the strategically located Oxwellmains approved Energy from Waste facility.

Vincent-Gorbing on behalf of Trenport Investments Ltd promotes land to the east of the A1 at Pinkerton for roadside uses IER ref: PM/DR/OTH004 [site assessed but not included in MIR].

Jigsaw Planning advise that Asda would like to ensure that the forthcoming LDP takes cognisance of the Asda store and other developments which have now taken place or are about to take place in the area. The role of the new Asda store at Dunbar and the additional facilities point towards this area having a role as a focus for community activity. As such recognition of this within the forthcoming East Lothian LDP is appropriate and its allocation as a centre, either as a District Centre or a Commercial Centre is recommended. This would allow the centre to have a clear position in the retail hierarchy and have a protected status within retail policy with recognition of its important contribution to the catchment population.

D Craik Esq proposes residential development at site PREF-D7 Auction Mart site and not for employment as proposed in the MIR. Strategic Employment Sites should be preferred over this site which is not effective as an employment opportunity.

Landowner at Broxburn promotes area of land some 0.1043 hectares in size at Broxburn Cottages, Dunbar IER Ref. PM/DR/HSG035 for housing. [site assessed but not included in MIR]

Persimmon Homes supports the preferred strategy; with the exception of East Linton Auction Mart (PREF D7) on the basis that it is not deemed a logical location for employment and has very limited local employment given small local population. Believes there is an over-sufficient supply of economic land within East Lothian and within this Cluster area.

Landowner of site PREF-D9 opposes site PREF-D9 The Crofts Stenton as there is very limited public transport from Stenton. Furthermore existing residents of Crofts have little interaction with the village community.

Hendersons Surveyors advise that the Moffats as landowners of the land are supportive of the allocation of their land in the MIR for sites PREF-D12 and ALT-D11 for housing at Innerwick.

Taylor Wimpey Plc c/o Holder Planning promotes ALT-D1 site at Eweford for housing. It notes that the land has been identified as a reasonable alternative site for housing development and other mixed uses within the Dunbar Cluster through the MIR. This is supported by Taylor Wimpey who confirm their willingness and intention to work with ELC to mitigate any issues with the site and facilitate its delivery in the longer term.

Robertson Homes c/o Holder Planning promotes site PREF-D5 at Newtonlees North as an effective and deliverable housing site. Fully supports ELCs allocation of this as preferred site for housing in the MIR.

Hallhill Developments Ltd c/o Holder Planning promotes site PREF-D5 Newton Lees and Brodie Road PREF-D4 as effective and deliverable sites for housing. Fully supports ELCs allocation of these as preferred sites for housing in the MIR

Scott Hobbs Planning on behalf of Neart na Gaoithe Offshore Wind Limited advises that any allocations of land to the north of Innerwick should take full cognisance of extant planning permission reference 12/00922/PM," Formation of onshore electrical transmission infrastructure between Thorntonloch and Crystal Rigg II" a development classed as national development by virtue of national development number 4 defined by NPF3.

Gladman Developments Ltd advises that there is a good range of sites in this cluster. However, the Countryside Around Towns designation upon East Linton, in particular is overly restrictive.

Scottish Power Energy Networks recognises the benefits of ELC's proposed 'cluster' approach as it relates to a wider development context. However, the approach should take full account of NPF3, which identifies the Forth coast between Cockenzie and Torness as an 'area of coordinated action' (ACA), to which no reference is made within the MIR. Accordingly, SPEN encourages ELC to fully address the ACA within its LDP Proposed Plan including, where necessary, coordination between clusters.

Rick Finc Associates on behalf of the MJ and V Rennie Trust are concerned that preferred approach will place significant pressure on one area of the town to deliver infrastructure and service improvements. They promote land at Sherriff Fields West Barns as effective and deliverable sites.

Geddes Consulting on behalf of Wallace Land and Gladys Dales Drylawhill Trust are concerned that neither approach will deliver the number of houses required in the timescales in the Dunbar Cluster.

There are a number of constraints restricting further urban growth within both East Linton and the Dunbar Cluster as a whole. The main town of Dunbar along with the smaller villages are all partially constrained by a range of factors including protected coast, flood zones, historic battlefields, Conservation Areas and protected gardens and designed landscape. Support allocation of land on the eastern edge of East Linton at Drylawhill as a preferred housing allocation within the Proposed LDP to provide locational choice, with scope for up to 215 units. The site is within The Area of Search OTH-D8 and part of the SDA.

Stewart Milne Homes c/o Holder Planning promotes a 6.5 hectare site at Orchardfield East Linton & also a site some 16.56 hectares in size at Phantassie for housing. Both sites are within the OTH-D8 area of search.

Clarendon Planning and Development Ltd on behalf of Barratt David Wilson Homes are concerned that neither approach will deliver the number of housing completions in the required timescales in the Dunbar Cluster. Promotes a site for 250 houses at Preston Mains Farm within the OTH-D8 East Linton Expansion for housing. East Linton should accommodate housing growth given planned rail station.

Gordon Tweedie promotes a site at Brands Mill some 5.99 hectares in size for housing.

New Sites:

Dunbar

- Sheriff Fields 1.37ha of land – Rick Finc on behalf of MJ and V Rennie Trust
- Sheriff Fields 7.8ha of land – Rick Finc on behalf of MJ and V Rennie Trust
- Brands Mill: 5.99ha of land –Gordon Tweedie

East Linton:

- Phantassie Farm 16.56 ha of land – Holder Planner on behalf of Stewart Milne Homes
- Preston Mains for 250 units of housing - Clarendon Planning and Development Ltd on behalf of Barratt David Wilson Homes
- Drylawhill 12.8ha of land for 215 units of housing - Wallace Land Investment Management & Gladys Dales Drylawhill Trust

Internal Consultees

ELC Countryside does not support site at Beveridge Row as there should be space between West Barns and Dunbar. Does not support the development in Innerwick because the only option for travel there is to use the car. If an appropriate cycle link was developed towards the coast, employment areas and North Sea Cycle Route was built then it would be more appropriate to have more housing here. Support designation of North West Quarry/Whitesands Loch as a local nature reserve.

Community Councils and local interest groups

Dunpender Community Council would not want to see large scale development imposed upon the village of East Linton. They suggest a limit of 150 houses in total, of which 42 already have planning permission at Whitekirk. They also advise that smaller houses are needed, retirement houses and flats, not more large houses. Concerned about impact on road network. Location of development on the A199 side of the town would be preferred, towards the east of the village. Prime agricultural land should not be developed. Development at Eweford would not be connected with the Dunbar

town centre. Dunbar being the smallest of East Lothian's 6 towns would find great pressure on its services. Support the preferred sites in the MIR, although an additional 16 houses in Stenton as proposed through PREF-D9 may be too many and should be limited to 10 or less.

West Barns Community Council believes an increase of 1000 new homes at Eweford would more than treble the size of West Barns. The Community Council has always supported small scale development in the area that can be successfully integrated in to the village without any subsequent loss of character and sense of community. Concerns about impact on the existing infrastructure (roads, water treatment) on existing services (health and education) and the provision of affordable homes. Concern about building on prime agricultural land. West Barns could lose its identity, becoming absorbed into Dunbar and becoming a suburb rather than a distinctive village. Concern over the demolition of the school

Dunbar Community Council are concerned that The Hallhill sites (Pref -D3 Hallhill North and Pref -D4 Brodie Road) are so large that development would create a new village and development on this scale would blur the boundaries of West Barns and Dunbar. A vehicular link under or over the rail line is essential and all links should prove safe and attractive for cyclists and walkers. Lochend Woods should be protected .Support provision of land for additional allotments and/or small holdings for local food production. Sites at PREF- D5 and PREF-D6 at Newtonlees should not be developed unless or until the development at Dunbar Golf Club was progressed. Development of brownfield sites and/or underused commercial sites, including sites within the conservation area, before any more agricultural land is used. Concerns about healthcare provision for all ages – primary, secondary and long term including residential care, concerns about impact on existing infrastructure and road network. Consideration should be given to increasing housing density wherever possible to leave more green space/play space and capitalise on the limited resource of the land bank. Housing mix should reflect the demographic needs of the community. The quality of design should be improved both at a 'unit' level and at a site layout level. Should include requirements for ecological and energy efficient design. Green links should be maintained and, where necessary, created to allow for the maintenance and enhancement of biodiversity links. Educational infrastructure is has an important role in this. The rail halt at East Linton is supported. Demand for small scale workshops and high tech offices at Spott Road and Auction Mart sites

Dunbar & East Linton Area Partnership supports site PREF-D3 Hallhill North in principal on the condition that it can be developed without significant negative impact on the Lochend Woods in terms of landscape value and biodiversity. Would support a slightly larger housing allocation in the village of Spott, up to 9 or 10 houses than PREF- D10 St John Street Spott currently proposes. Would propose allocating two or more sites within Stenton with the sum equivalent to 16 homes instead of one large site as PREF- D9 The Crofts proposes. Strongly opposes alternative site ALT-D1 Eweford due to concern about coalescence of Dunbar and West Barns, lack of crossings over the railway in the area and loss of prime agricultural land. Would support some allocation of additional housing land in East Linton as long as this allocation is limited in scale and sympathetic to the local area. Would support the allocation of additional housing at Wester Broomhouse. Would like to stress the importance of providing additional crossing points over or under the railway line.

West Barns Parent Forum object to the proposed alternative development site at Eweford Farm (PM/DR/HSG015) which would involve the closure and demolition of the current school and a new school being constructed in the development. The school currently provides a "heart" to the village and provides a focal point for the community. To lose this will have a direct impact on the whole community, not just our pupils. The loss of the playing fields and school grounds, to provide access to the new development, will have a detrimental effect on the opportunities for outdoor play and physical activity. We understand that East Lothian Council deem the protection of rural schools as a

priority, therefore to close such a school and amalgamate it into a larger, heartless and manmade community school would be in direct contravention of this.

Sustaining Dunbar , Architectural Heritage Society of Scotland, Association of East Lothian Day Centres & Scottish Green Party East Lothian support retention of employment land at Spott Road and at the Auction Mart site in East Linton. Support for provision of small, affordable, flexible workspace as proposed for the Auction Mart. Support the need for land for local skills training facilities as the current need to travel to Edinburgh or beyond is a major barrier for many young people, particularly from rural areas. We would like to see a move away from low-density suburban sprawl towards active promotion of alternative models of development including high-density, low-rise development, provided it is of high quality in terms of design and construction and provides a balanced mix of property types to encourage a diversity of households. We would also like to see active support and promotion of community led developments such as eco-housing and support for provision of self-build opportunities, including through use of community land trusts. All developments must require provision of open space for community gardens and allotments as well as new wildlife corridors. Streets and open spaces should be designed to encourage informal social interaction and active travel. Site at Eweford would link existing settlements to the north, and produce a large housing area virtually divorced from the town centre. Generally, housing density should increase, the mix should mirror the demographic needs of the community, green links should be maintained or created to support bio-diversity, and the design of individual houses and of layouts should be greatly improved.

Rail Action Group East of Scotland (RAGES) believes better access from homes across the East Coast Main Line to Dunbar town centre by way of a new bridge or underpass would be required from development at Eweford. Need to improve rail services to and from Dunbar. Need to improve car parking facilities at Dunbar train station. The planned East Linton station will help to take cars off the A1 to Edinburgh and provide some additional parking which may help Drem Station users;

Members of the public

- Access over/under the railway line to the west of the town is a crucial issue which needs to be resolved before development takes place on the Eweford site;
- Cumulative impact of development throughout East Lothian causing road congestion and pollution of the environment;
- The proposal to add 16 affordable homes to Stenton is not sustainable development;
- The infrastructure of the Dunbar area, in particular, roads, public transport, schools and drainage cannot sustain the numbers of additional houses proposed;
- Greater priority should be given to renovating housing in the old part of the town, especially around the High Street;
- The distance from Edinburgh and poor train service mitigates against such a large expansion;
- Housing development should only progress if it can be matched by employment in the immediate area;
- Potential for some East Linton expansion if a rail halt is implemented. The best area for this would appear to be to the south/south west of the town, which has extensive potential;
- Dunbar is close to losing its sense of community;
- There needs to be a wider range of high quality housing at both ends of the price spectrum to engineer a good social mix. Concentrating social housing in the old town has disbenefits and ghettoises the poor;
- As far as possible, development should be in settlements within walking distance of a Primary School and good access to public transport links;
- East Linton must take more housing if it is to get a new rail link;

- There are strong transport links in place and an acceptable commute to Edinburgh, coupled with realistic local employment opportunities that could help drive sustainable expansion in this region. In addition, expansion opportunities for East Linton could help secure a much needed rail halt, which would provide opportunities to better link to Edinburgh and reduce traffic on the A1, whilst creating a larger and more sustainable village centre for East Linton;
- The provision of housing and especially affordable housing is one of the most pressing issues facing the Local Authority;
- Concern about building on prime agricultural land;
- There is not capacity or infrastructure to support the scale of development proposed in the preferred option let alone the alternative;
- The most sensible areas to build new houses would be in areas to the south /south west/ south east of the village of East Linton where there is easy access onto the old A1 and the planned rail halt. The main issue with expansion is transport. Indisputably there will be pressure to rely on the motor car as the principal means of transport;
- Development at Eweford needs to be done with careful consideration of how good walking and cycling links to Dunbar and the train station could be incorporated. A new link road across the railway line at the west of the town could open up potential to develop a commercially viable circular town bus service;
- Develop within old town first for example the Co-op & Factory Outlet at Friars Croft are both underused and could be better used as housing sites;
- In general Dunbar seems a good place to expand, with easy access on the train line, the A1, nice coastal community, good schools and a thriving town centre.

Education Matters:

- Funded by the developers;
- It is not helpful to assess within a Dunbar wider catchment area;
- Neither Scottish Government or private developers have the funds or the inclination to address this;
- An increase in council tax would be the fairest way to increase council revenue;
- PFI should be avoided since they constitute short term gain at much greater long term cost;
- Spaces in schools has already been identified;

Where should it/ they be located?

- If East Linton development was an option, there might be a need for looking at investment into a High School here that could also service any future potential expansion of the community at Drem;
- A new school at the Eweford site is preferable to making the existing school bigger and bigger. However the cost of a new access route over the railway line would have to be factored into the cost of the school;
- Potential expansion of West Barns Primary School on a new campus south of the East Coast Main Line;
- Potential expansion of Dunbar Grammar School on current site.

Key Messages:

- **Historic Scotland stress the need to safeguard historical assets;**
- **Sportscotland raise concerns regarding loss of sports pitches through school expansion;**
- **Transport Scotland is concerned about the road network capacity, particularly in the west of East Lothian. However they are working with ELC to identify solutions and funding methods**

to address these concerns;

- Midlothian Council advises that the trunk and local road network capacity a concern, particularly in the west of East Lothian. However they are working with ELC to identify solutions and funding methods to address these concerns;
- Developers are concerned that neither approach will meet SESplan housing requirement;
- National Trust say it would be inappropriate to develop land to the north and east of Preston within the area of search for East Linton;
- Viridor supports the intention to co-locate heat producers and users wherever practicable;
- ASDA would like to see recognition of site at Spott Road as either a Commercial Centre or District Centre to safeguard their position in retail hierarchy;
- Preference for preferred approach from the public;
- West Barns and Dunbar in danger of merging with consequential loss of identity of West Barns and Belhaven;
- Strong support for a link under/over the East Coast Rail line from Development at Eweford/Hallhill to Dunbar;
- Need to improve public transport links from and to Dunbar to reduce reliance on private travel;
- Support for rail halt at East Linton but recognition that this will attract further housing;
- Need to safeguard employment land at Spott Road and Auction Mart Site;
- Need strong design policies to ensure building for place;
- Impact on education provision;
- Impact on infrastructure;
- Loss of prime agricultural land;
- The table below indicates the views expressed in relation to particular sites.

Secondary school cluster area:		Dunbar		
MIR reference	Site name	Support	Object	No opinion
PREF-D2	Beveridge Row	10	7	17
PREF-D3	Hallhill North	16	6	15
PREF-D4	Brodie Road	17	4	15
PREF-D5	Newtonlees North	17	4	15
PREF-D6	Newtonlees	16	4	15
PREF-D7	East Linton Auction Mart	16	6	13
PREF-D9	The Crofts (Stenton)	12	10	15
PREF-D10	St John Street (Spott)	14	6	15
PREF-D12	Innerwick East	14	6	15
ALT-D1	Eweford	9	16	15
ALT-D11	Innerwick West	11	6	16
OTH-D8	East Linton Area of Search	19	3	13

Issue: North Berwick Cluster	MIR question: Question 16
Total number of responses on issue	187
Support preferred approach	31
Do not support preferred approach	64
<p>Scottish Government key agencies and adjoining authorities</p> <p><u>Historic Scotland:</u></p> <ul style="list-style-type: none"> • PREF-N4 Castlemains (Dirleton) This allocation for 30 homes will have the potential to fundamentally change the character of the Castlemains Place, within Dirleton Conservation Area. Historic Scotland therefore advises that a design strategy should be developed, used in conjunction with a conservation area appraisal. They have strong concerns about the potential impact on the setting of this scheduled monument, and advise that this should be a fundamental design consideration as proposals for this area are developed; • PREF-N9 Aberlady West This allocation for 100 homes would have the potential to fundamentally change the character of Aberlady Conservation Area; • Alternative Development Strategy ALT-N10 Aberlady East This allocation lies within Aberlady Conservation Area, and will have the potential to fundamentally change its character; • OTH-N11 Potential Drem Expansion Area of Search This area of search is identified as being either for approximately 1000 homes, or approximately 5000-6000 homes. Historic Scotland advises that, in light of the scale of the development, one of the major concerns in early design stages will be to avoiding completely surrounding the Drem conservation area and to avoid fundamentally altering its character. This includes the setting of a number of B and C listed buildings, and should be given consideration in design phases. The scheduled monument known as New Mains, enclosures and ring ditch 580m W of West Cottage (SM 111) is within the identified search area, and there is the potential for impacts on its setting. <p><u>Sportscotland</u> is a statutory consultee where certain outdoor sports facilities may be lost. The possible expansion of North Berwick High School to accommodate additional pupils generated by the proposed housing in the cluster would result in the loss of sports pitches. Therefore these plans would be subject to mitigation/solutions being found for the loss of those sports pitches.</p> <p><u>Scottish Natural Heritage</u> has concerns over PREF-N2 Tantallon Road due to landscape and visual impact on North Berwick Law. Believes sites at ALT-N3 Foreshot Terrace Dirleton, Alt-N6 Fentoun Gait East, N7, Fentoun Gait South Gullane and OTH-N11 Drem Expansion Area of Search would be preferable.</p> <p><u>Transport Scotland</u> advises that the trunk and local road network capacity a concern, particularly in the west of East Lothian. However they are working with ELC to identify solutions and funding methods to address these concerns.</p> <p><u>Midlothian Council</u> considers development in all clusters will have ‘downstream’ implications for Midlothian in terms of road traffic. Using sites with rail access may reduce cumulative impacts. Cumulative impacts should be modelled and used to define required upgrades and secure developer contributions.</p> <p><u>Scottish Water</u> has instigated a growth project for North Berwick which is progressing through the design stages at present. While this may lead to some delays to development sites in the short term, this project will be designed to take account of any development allocated in the Local Development</p>	

Plan. The capacity of the works should not be seen as a reason for not allocating development within North Berwick. If East Lothian Council has an identified need for housing within North Berwick which is being restricted by the capacity of the treatment works and not currently promoted within the emerging LDP, it is essential that this is highlighted to Scottish Water so that additional capacity consideration can be applied.

National Interest Groups

Homes for Scotland believes there is a shortfall in the proposed supply of housing that has implications for the Proposed Plan. The Council should review the approach to decisions on windfall sites to maximise housing delivery in the short to medium term.

The Coal Authority is pleased to see that as part of the mitigation identified for the cluster areas there is a requirement for consideration of ground conditions and methods of mitigation.

Internal Consultees

ELC Countryside believes the expansion of Drem is to be supported given that there is a rail halt there. However, it would have to be accompanied by appropriate active travel links and may be able to help with a link to Gullane. North Berwick lacks non vehicular active travel and public transport links between the villages and North Berwick. The station at Drem has very poor non vehicular linkages. Any development should incorporate green networks to enhance biodiversity and active travel.

Landowners, developers and agents

APT planning and development on behalf of W.J. Simpson and Son promotes site ref PREF-N4 at Castlemains Farm in Dirleton to provide 30 new homes. Information demonstrating why site is effective and deliverable supplied.

TMS Planning and Development Services on behalf of landowners of site ALT-N3 Foreshot Terrace promote their site ALT- N3 Foreshot Terrace Dirleton. Supply information on why site is effective and deliverable. Make comments on site assessment carried out in IET. Oppose development of preferred site Castlemains PREF-N4.

Barton Wilmore on behalf of The Scottish Fire and Rescue Service promotes the Fire Station site PREF-N5 in Gullane for housing. The preferred approach to new economic development is outlined in the MIR: 'The preferred strategy supports the retention of existing operational employment areas as well as the employment allocations of the current local plan.' (p. 79) This approach is not generally supported in that there is a focus on the maintenance of employment sites that have been notably ineffective over the lifetime of the previous plan.

Holder Planning on behalf of Miller Homes supports the allocation of ALT-N1 Ferrygate North Berwick for housing. Supplied information on site being effective and deliverable.

Holder Planning on behalf of AWG and Taylor Wimpey: consider that the proposal for major housing development centred around Drem and Fenton Barns does not represent a sustainable development strategy. The area is relatively remote, and it is notable that Fenton Barns is not within the East Coast Strategic Development Area. It is remote from areas of high housing demand, key services, and public transport options are limited. Greater Blindwells, on the other hand, is centrally located within East Lothian, with good access to existing communities and public transport. Also, the scale of

development being proposed at Greater Blindwells will be of sufficient critical mass to support new facilities and infrastructure of a scale to create a self-sustaining community, which is unlikely to be possible at Drem/Fenton Barns.

Geddes Consulting on behalf of T G Tait & Son promotes site PREF-N2 at Tantallon Road North Berwick and supplied information on site being effective and deliverable.

Wardell Armstrong on Behalf of Cala Homes promotes site PREF-N8 at Saltcoats Gullane for residential development for 150 houses. Supplied information on site being effective and deliverable.

Wardell Armstrong LLP on behalf of Cala Homes (East) Limited promotes site at Bickerton Fields Aberlady (ALT-N10) for delivery of between 60-80 houses, supplied information on site being effective and deliverable.

Wardell Armstrong on behalf of Cala Homes promotes site ALT-N6 at Fenton Gait Gullane and supplied information on site being effective and deliverable.

Ryden on behalf of Historic Lothian Protection & Development Ltd promotes a change in Policy ENV12 (East Fortune Hospital), of the adopted East Lothian Local Plan 2008 to support residential development on the site of the hospital which would in part fund the restoration and re-use of 7 Category B listed buildings. Supporting information supplied.

Ristol Consulting Ltd on behalf of the landowner promotes an area of land off St Margaret's Road at The Glebe (PM/NK/HSG022) for residential development and additional car parking for the town centre. [site assessed but not included in MIR]

G H Johnston Building Consultant Land promotes land at Speedwell Gardens Dirleton (PM/NK/HSG068) for housing development and disagrees with the findings of the Interim Environmental report . [site assessed but not included in MIR]

Gladman Developments Ltd believes the Countryside Around Towns designation for North Berwick and Dirleton would add another layer of policy to an area which has sufficient protection.

Persimmon Homes believes there is an over-sufficient supply of economic land within East Lothian and within this Cluster area.

Colliers on behalf of Taylor Wimpey and Mactaggart and Mickel opposes site OTH-N11 proposal at Drem which is considered to have no strategic justification in that the area lacks any key infrastructure and is a rural countryside location. It is suggested that there are more deliverable sites which, subject to the issue of transport constraints being addressed, can become effective and address the existing housing land requirements.

New Sites

Strutt & Parker Associate on behalf of landowner who owns land to the south and west of the Train Station at Drem supports the Preferred Approach and in particular the identification of an area of search around Drem. Promotes land in close proximity to train station. Will release land and work with other owners to secure delivery of site. Site is within site reference OTH-N11 The land is within the Council's area of search for housing development.

APT Planning & Development on behalf of Cala Management Ltd promotes the expansion of Drem to provide up to 2,000 new homes and associated education, community and commercial uses on 114 hectares of land that they are contracted to purchase on receipt of appropriate planning permission. Provide detailed information of the site to demonstrate why it is effective. Site is within site reference OTH-N11 The land is within the Council's area of search for housing development.

Savills on behalf of Drygrange Estate Company Ltd supports the Reasonable Alternative approach and promotes 77 ha of land at Fenton Barns for up to 1000 houses. The site consists of 2 parcels of land to the north and south of the existing employment uses at Fenton Barns. Site is within site reference OTH-N11 The land is within the Council's area of search for housing development.

PPCA Ltd on behalf of Wallace Land Investments supports the identification of a Drem Expansion Area of Search site reference OTH-N11 in the MIR but would wish to see that area of search focused instead on Fenton Barns less than one kilometre to the north of the conservation village.

Montagu Evans on behalf of J Haig Hamilton and Sons promotes 1.5ha of land at Athelstaneford for housing. Concerns about information in MIR on education capacity and in particular the information on Athelstaneford primary school. Proposal H8 of the adopted East Lothian Local Plan 2008 relates to land at Athelstaneford and is an existing allocation within the adopted East Lothian Local Plan (2008). There is no planning permission for development at the site, and it appears that the site is not coming forward for development. This should be recognised within the established housing land supply figures, with alternative effective sites to be considered for development. It is submitted that, if allocated for development, our client's land could be developed within the Plan period.

Smiths Gore promotes 1.56ha of land to the south of Bunkershill on Abbotsford Road North Berwick for housing.

Farningham Planning Ltd on behalf of Lord Wemyss Trust in support of future residential development on land extending to approximately 5.8ha at Kirk Road, Aberlady for 100 dwellings

Community Councils and local interest groups

North Berwick Community Council accepts growth is inevitable. Do not support development on west side of Heugh Road. Do not support development ALT-N1 at Ferrygate. Mains Farm should be considered as a site for more houses than are currently planned. Concern that development at Drem & Fenton Barns would add to road traffic problems and put even more strain on existing amenities in North Berwick. North Berwick needs small units where businesses can be operated close to areas where people live and it is noted that Tantallon development plans include this. Feel that it is essential to maintain the identity and character of North Berwick and indeed all the separate towns and villages in East Lothian. Suggest East Fortune as a viable alternative. Admittedly there is no rail link (but commuter trains are nearly full by the time they get to Drem anyway) and access to the A1 would be much easier.

North Berwick Environment Trust considers the Preferred Approach to be the better option. In respect of train traffic on the Edinburgh–North Berwick railway, we agree that there is a problem of limited capacity. Concerned about capacity of road network and water works to cope with expansion. Concerned about education capacity. Do not support Ferrygate as a potential housing site. The 9 hectares of land at Tantallon Road could be promoted, subject to infrastructure provision and mitigation, for a mixed-use development of housing and business but North Berwick Environment Trust find it hard to believe that development of this site will not affect the visual impact of the ridge of the classical 'crag and tail' feature of the Law. Note that land release at

Dirleton subject to education and access capacity.

Dirleton Village Association believes any development should be sympathetic to the conservation status of the village. Considers that there is no scope for expanding the primary school. Concerned about development at Ferrygate ALT-N1 and about significant development at Drem.

Gullane Community Council has provided detailed comments relating to housing sites in the community council area:

Gullane: Primary school has limited capacity. Do not support development of Saltcoats PREF-N8. Do not consider that the possibility of such development opening the way to expansion of the school would justify our departing from that view. Also concerned that it would impact on biodiversity of area and would breach the boundary of the village. Support development of Fire Station Site PREF-N5. Support Fenton Gait South for affordable housing ALT-N7. We are concerned that the development of Fenton Gait East would lead to a wider acceptance of the principle of further development of the land to the east of it.

Aberlady: The consensus view in the village is that, whilst some additional housing might be considered, the addition of another 100 homes would be too many. Our view is that the Bickerton Field site is unsuitable for housing because the essential rural character of the village would be severely eroded by damage to the integrity of the conservation area, including the countryside included within it. Of the sites to the west of the village, only the Elcho Terrace site might reasonably be considered for development. An absolute prerequisite of any such development must be further investment in the infrastructure of the village. This should be provided in advance of any new houses being built. Concerns about traffic levels arising from new development are raised throughout.

Dirleton: we understand that there is a considerable variation of views within the village. Any development should be sympathetic to its conservation status. The limitations of the primary school capacity, the lack of other facilities in the village and that issue of increased traffic should be carefully considered. Some development on either Castlemains Place or Foreshot Terrace would be reasonable.

Drem: While no sites in Drem were put forward in the call for sites in 2013 as suitable for housing, the Council has itself assessed two sites there in the interim environmental report. The first of these is described as having a proposed use as “small scale village expansion – housing”. The second site, adjacent to it, has a proposed use for affordable housing. Neither of these sites is included in the Report as either a preferred site or a reasonable alternative site. We agree with this. We are strongly opposed to the scale of development in the Drem/Fenton Barns area as postulated in the MIR due to the impact it would have on infrastructure, tourism and agriculture. Suggest the main focus of development should be in the western part of the Strategic Development Area.

North Berwick: We remain concerned about the development of the Ferrygate site for housing, for the reasons stated in the recently issued refusal notice, in the letter of objection which we submitted and in the representations which were made jointly by us and the Dirleton Village Association to the planning committee.

Aberlady Community Association: We are of the opinion that only one of the four suggested sites within the village sites would be acceptable (Elcho Terrace) if access and the appropriate type of housing were built.

Aberlady Conservation and History Society: We believe the potential for further housing development in the village is quite limited. Of the four Aberlady sites suggested we are of the view that the Kirk Road, West Aberlady and Bickerton Fields are unsuitable for development (Sites assessed but not put forward as part of MIR). The Elcho Terrace site could in principle be considered for development and provide affordable housing to meet local needs subject to appropriate access and landscape mitigation.

Association of East Lothian Day Centres agree with the preferred option but only if the infrastructure of transport networks, sewerage, education and medical services are in place to cope with the intended development and population increase. Do not consider development ALT-N1 on the West to be appropriate for North Berwick as it would detract from what is a beautiful and sympathetic approach to North Berwick. No objection to the preferred development on the east of North Berwick provided the infrastructure issues are addressed before development takes place. The proposal OTH-N11 around Drem and Fenton Barns to be wholly unacceptable as a development over any time frame.

North Berwick High School Parent Council about scale of growth and the capacity of the school to cope, need to preserve open space adjacent to the west of the High school. MIR does not pay any attention to the impact of new development on infrastructure in North Berwick and in particular health services and transport network.

North Berwick Coastal Area Partnership support the allocation of site PREF-N5 Fire Service College (Gullane) but that this must be mixed-use- private and affordable housing as well as employment land. Emphasis on supporting any increased housing in the area was placed on the type of housing with note given to a lack of 3 to 4 bedroom housing, i.e. family housing in the area. PREF-N8 Saltcoats (Gullane). Concern that development must not encroach upon on agricultural land and impact on protected species. Concerns over the impact of increased school capacities for Gullane Primary, and the ramifications this may have for general road and pedestrian safety with the potential increase in the number of vehicles. PREF-N4 Castlemains (Dirleton) a mixed response to this proposed site, with emphasis placed on the importance of avoiding traffic congestion and ensuring housing allocation did not impact on the setting of Dirleton castle. They are opposed to OTH-N11 Potential Drem Expansion Area of Search due to concerns of flooding and the impact the scale of development would have on the existing community.

Conservation North Berwick oppose any development of The Glebe ref: PM/NK/HSG022 (assessed but not included in MIR) in North Berwick and support the MIRs position that the entire site should remain undeveloped and protected in accordance with policies C3, ENV4 and ENV5 of the adopted East Lothian Local Plan 2008.

North Berwick Coastal Area Partnership believes car parking constraints within North Berwick are a cause of serious concern, impacting on the quality of life for the community and local economy, particularly during the summer linked to tourism.

Dirleton School Partnership we agree that while North Berwick High School can be expanded to accommodate existing population commitments, and some further commitments on a relatively small scale, Dirleton Primary School is acknowledged as having very limited capacity available and cannot be further expanded.

Rail Action Group East of Scotland (RAGES) believes that there is a need to improve integration and effectiveness of public transport network into and out of North Berwick. If there is to be development at Fenton Barns, the reinstatement of Dirleton Station could be considered, with the associated land adjacent for car parking

Scottish Green Party East Lothian believes a policy on second homes in the cluster should be considered.

Comments from members of the public

General concerns about:

- 480 new homes in this cluster is too many and a disproportionate amount for the area to cope with;
- education capacity and ability of all schools in the cluster to cope with expansion a real concern;
- Impact on road and rail network which are already under pressure;
- Impact on water and drainage;
- Formulae for calculating how many pupils from developments being fit for purpose;
- Need new employment opportunities as well as housing;
- Should direct development closer to the A1 with better transport links to Edinburgh;
- Felt that if had to accommodate some new development that this should be at Mains Farm;
- Should direct development to west of the region;
- Some support for development at Drem due to the rail link;

Comments on Aberlady:

- Support for preferred approach;
- Further housing in Aberlady should be strictly controlled and oppose the excessive scale of further housing;
- Strong opposition for the proposal ALT-N10 Aberlady East (Bickerton Field) and PREF-N9 Aberlady West;
- Too many houses proposed;
- Coastal approach to Aberlady should be maintained;
- Council could extend the Countryside Around Town Area to the east of Aberlady;
- Building on prime agricultural land should be avoided;
- If further development is deemed unavoidable, then development at the western end of the village (PREF-N9) would be acceptable;

Comments on North Berwick:

- Support for preferred approach concentrating development to the west;
- Opposition to development at Ferrygate ALT-N1;
- North Berwick should not be a focus for additional housing;
- Tantallon Road is an area of natural beauty and would be damaged by development;
- Need to protect Scotland's iconic views around North Berwick;
- Need to protect town centre;
- Separation between North Berwick Law and the southern urban edge should be retained;
- PREF-N 2 Tantallon Road site should be viewed as two separate proposals Tantallon road and Heugh Road;
- If any site had to be used for both business and residential it is better suited to the west of the town;
- Need to protect the character of North Berwick;
- Some support for site PM/NK/HSG022 at The Glebe in North Berwick.[site assessed but not included in MIR];

Comments on Gullane:

- Strong opposition to development site PREF-N8 Saltcoats Road (52 written comments);
- Strong support for development of the PREF-N5 Fire Service College
- Some opposition to site ALT-N6 Fenton Gait East and Alt-N7 Fentoun Gait South;
- Access roads would not support scale of development;
- Poor public transport links;

- North Berwick High School at capacity;
- Majority of new houses in Gullane are outwith the village envelope;
- No facilities to support so many new houses in Gullane;
- Loss of prime agricultural land;
- Impact on Geese and swans and other wildlife;
- Damage to tourism in area if increase in housing development;
- Breaching the robust boundary of the village;
- Visual impact of development;
- Integration of new communities into village;
- Other communities in the west of East Lothian require investment;
- Dispersed approach would result in need to travel and cause an increase in CO2 emissions;
- Strong opposition to sites PM/NK/HSG088 26A & 26B Muirfield Gullane; [sites assessed but not included in MIR];

Comments on Dirleton:

- Preferred approach opposed
- General preference for Reasonable Alternative site ALT-N3 Foreshot Terrace as opposed to the preferred one PREF-N4 Castlemains as its a smaller development and more appropriate for the village;
- ALT-N3 site at Foreshot Terrace site is a much more discrete site, which unlike the PREF-N4 Castlemains site is not visible from the main roads by mature trees and undergrowth;
- There would also be less disruption to residents during the development on the AT-N3 Foreshot Terrace site than PREF-N4 Castlemains;
- The PREF-N4 site at Castlemains would have a much greater impact on the feel of the village due to its proximity to the Castle than ALT-N3 Foreshot Terrace;
- Concern that Dirleton Primary school cannot cope with further expansion;
- Poor public transport links into and out of the village;
- Should direct development to Drem;

Comments on Drem:

- Some support for development at Drem but also some opposition;
- Poor infrastructure not capable of supporting significant development;
- Drem not the place for a major development in East Lothian;
- Scale of development would impact on existing local community;
- Need to address car parking issues around station;
- Building on prime agricultural land.

Key Messages:

- **Historic Scotland have concerns about the impact of proposal PREF-N5 Castlemains on character of the conservation area in Dirleton and strong concerns about the impact of it on the setting of the Scheduled Monument of Dirleton Castle;**
- **Historic Scotland have concerns about impact of proposals at Aberlady on its conservation area ;**
- **Historic Scotland have concerns about Drem being completely surrounded by development which would impact on its conservation area and fundamentally alter its character and also that this location is not a good one for significant urban expansion, including when considered relative Blindwells;**
- **Transport Scotland is concerned about the road network capacity, particularly in the west of East Lothian. However they are working with ELC to identify solutions and funding methods to address these concerns;**

- Scottish Natural Heritage has concerns over PREF-N2 Tantallon Road due to landscape and visual impact on North Berwick Law. Believes sites at ALT-N3 Foreshot Terrace Dirleton, Alt-N6 Fentoun Gait East, N7, Fentoun Gait South Gullane and OTH-N11 Drem Expansion Area of Search would be preferable;
- Midlothian Council considers development in all clusters will have ‘downstream’ implications for Midlothian in terms of road traffic;
- Scottish water advises that there is a capacity issue within the North Berwick cluster which may affect development in the short term. However a growth project has been initiated and any allocation of housing sites within the cluster through the LDP will be included in the growth project. It should not be a reason for the non allocation of sites;
- Developers/landowners promoting sites to ensure sufficient completions within the required timescales to meet SESplan targets;
- Support from public for development to be concentrated in west;
- Concern from public that villages will lose their character if Reasonable Alternative option followed;
- Opposition to development of ALT-N1 at Ferrygate;
- Strong opposition to development of PREF-N8 Saltcoats at Gullane;
- Strong opposition to development of ALT-N10 Aberlady East;
- Some opposition to PREF-N9 Aberlady West but also some support for that site;
- Support from for development of the PREF-N5 Fire Service College Gullane for mixed-use-private and affordable housing as well as employment land;
- Some preference for Reasonable Alternative ALT-N3 Foreshot Terrace instead of preferred site PREF-N4 Castlemains in Dirleton but similar levels of objection/support to sites;
- Concern from public regarding impact of development across the cluster on road network, education capacity and infrastructure;
- Concern development would impact on tourism;
- Concern regarding development resulting in loss of prime agricultural land;
- Mixed opinions from public on development at Drem – scale of proposals would impact on local community and local infrastructure but would help direct development away from other settlements.

Secondary school cluster area:		North Berwick		
MIR reference	Site name	Support	Object	No opinion
PREF-N2	Tantallon Road	25	19	38
PREF-N4	Castlemains (Dirleton)	20	27	37
PREF-N5	Gullane Fire Service College	73	15	14
ALT-N1	Ferrygate	11	30	42
ALT-T3	Foreshot Terrace (Dirleton)	21	24	37
ALT-N6	Fentoun Gait East (Gullane)	16	57	19
ALT-N7	Fentoun Gait South (Gullane)	14	58	18
PREF-N8	Saltcoats (Gullane)	14	76	18
PREF-N9	Aberlady West	19	21 plus letter from 52 residents	43
ALT-N10	Aberlady East	15	30 plus letter from 52 residents	33
OTH-N11	Potential Drem Expansion Area of Search	29	41	21

Issue:	MIR question:
Blindwells	Question 17
Total number of responses on issue	120
Support preferred approach	60
Do not support preferred approach	27
Scottish Government, key agencies, and adjoining authorities	
<p><u>Scottish Government on behalf of Historic Scotland</u> this area of search for the eastern expansion of Blindwells has the potential to adversely affect the setting of A listed Seton Castle and its curtilage buildings, as well as the associated inventory garden and designed landscape, particularly in the north-western section of the boundary. However, they consider that development over the majority of the allocated site is unlikely to raise concerns.</p> <p><u>Scottish Government on behalf of Transport Scotland</u> The identification of transport interventions, potentially including railway stations, should result from the assessment of evidence based transport problems and opportunities of a specific area. A range of transport alternatives should be considered rather than the exercise focusing on a rail based solution from the outset. The MIR also mentions a potential new trunk road interchange with the A1 within the preferred approach for Blindwells on page 169. Transport Scotland’s position continues to be that any potential junction would require to be subject to an appropriate STAG based appraisal and to subsequently be assessed in further detail in accordance with DMRB. Consideration should be given to junction spacing standards outlined within DMRB.</p> <p><u>Scottish Water</u> As per previous engagement with East Lothian Council, Scottish Water supports the preferred strategy for Blindwells as this maximises the use of our existing infrastructure. However, if there are other more substantive issues for other stakeholders which favour the alternative these would also be supported.</p>	
National interest groups	
<p><u>Homes for Scotland</u> believes that Blindwells is currently constrained, and that neither the existing area nor an expanded area can be counted as contributing to the effective land supply for the LDP period unless comprehensive solutions to addressing infrastructure constraints can be found prior to the Proposed Plan stage.</p> <p><u>Network Rail</u> considers the impact of traffic from this development area will have adverse impacts on the St Germain’s level crossing.</p> <p><u>Sportscotland</u> states that the provision of a new settlement provides a relatively rare opportunity to be pro-active. Issues to consider include – planning for walking and cycling to promote active travel, assessing potential demand for sporting facilities and planning for their provision in sustainable locations; utilising sportscotland design guidance in designing any new education facilities, and designing any such facilities to permit and encourage community use.</p> <p><u>The Coal Authority</u> In principle welcomes the redevelopment of surface mining sites for beneficial after-use where appropriate. This can bring about significant environmental enhancement.</p> <p><u>Royal Society for Protection of Birds</u> state that any development at Blindwells should provide acceptable mitigation for the loss or modification of the wetland habitat on its northern boundary.</p>	

Steps should be taken to retain and enhance the waterbody there as far as possible. A comparable undisturbed waterbody with managed access should be created elsewhere to make up for the impact on what is a scarce habitat type in East Lothian.

Internal Consultees

ELC Countryside believe that contributions should be obtained from all developers towards implementation of green network infrastructure both within and outwith the site, including active travel links, specifically connections to a potential Cycle Super Highway, active travel connections to existing core paths and facilities such as Prestonpans Station, and connections northwards across the railway for non-motorised access. The implementation of green network infrastructure must be appropriately phased with the development of the site.

Landowners, developers and agents

Turley on behalf of Hargreaves UK Services Ltd and Mr R Kennedy: support for the existing allocation and the allocation of a greater site at Blindwells as suggested in the preferred options. The key enabling aspect of the delivery of the site is ground remediation, the initial stages of which are about to start imminently. Taking both phase 1 and 2 of the greater Blindwells together, an indicative 3000 units could be delivered in this location. Both phases 1 and 2 could be developed independently of any other phases and do not rely on any additional land to the east to facilitate delivery. This is a brownfield site which is in a highly accessible area, in close proximity to Edinburgh. Our clients are willing to gift the land to East Lothian Council at an early stage in the development process so that the Council can commence the construction of education facilities at the appropriate time. This type of arrangement would require a reduction in other developer contributions to reflect this. Should the Council not wish to enter this type of arrangement, our clients would be willing to participate in an excambion (exchange) of land. Should the council wish the delivery of education facilities to be delivered in any other manner, we would welcome the chance to discuss the mechanisms with the Council. A full audit of those education facilities within East Lothian is required in order to understand what the short, medium and long term education solutions are once the Proposed LDP has allocated residential sites. Once this has been identified the delivery mechanisms for education facilities can be established. A key aspect of the delivery of the site will relate to phasing. The masterplan documentation submitted with this representation identifies that the phase 2 of Blindwells would link seamlessly with the current allocation and PPP. Furthermore this site could proceed alone and in the absence of any development to the east.

George F White LLP on behalf of Mr R M Steven, owner of Greendykes Farm is in general support of the proposals to extend the Blindwells New Settlement to its maximum extent as outlined in the MIR. This will be subject to specific consideration of development phasing and master planning and a collaborative approach to developing the site by all parties involved. This is no different to any other strategic site allocation with multiple land ownerships and can be considered as part of a Supplementary Planning Document, overriding masterplan/application or similar for the site. Mr Steven is willing to assist this process and we are instructed to facilitate the necessary discussions with the Council and other land owners.

Holder Planning on behalf of AWG and Taylor Wimpey support the allocation of the existing allocated site and the expansion land to the east. This submission relates to the Eastern Extension of the allocated Blindwells site: specifically, it relates to the land immediately east of the existing Blindwells allocation, where there is currently agreement amongst all of relevant landowners to work together to bring forward this land for a second phase of development. The area can be developed in co-ordination with land further east, controlled by Mr M Stevens and Taylor Wimpey.

There are two existing points of access onto the A1, at the Bankton junction via the A198 to the west and at the Gladsmuir junction via the B6363 to the east. The western access has a limited capacity and is unable to serve significantly more development than allocated in the adopted Local Plan. At least one additional main access will need to be provided if Greater Blindwells is to be developed to its full potential. Two main access points create the opportunity to build more rapidly, but also allows for greater flexibility in the types of development that can proceed and can accelerate the provision of community facilities that require a critical mass of population to be implemented (e.g. a secondary school). In terms of the land to which the submission relates, an indicative masterplan is provided showing an indicative distribution of development and a secondary school in the Phase 2 area, as an extension of a wider campus for primary and community facilities shown within the existing allocated site. An additional access to the A199 is also illustrated. The Eastern Extension of the current Blindwells allocation is in our view a sustainable proposition, but, in our view, there is no logical planning reason for insisting that development progresses from west to east. The key issue, we believe is to establish a coherent masterplan for the whole of the Greater Blindwells Area and determine an appropriate phasing of that masterplan that ensures the appropriate delivery of homes and community infrastructure. It seems likely that this would allow for development to progress simultaneously from multiple access points. The Indicative Masterplan prepared on behalf of Hargreaves presents a sustainable option for the future development of Blindwells, which should also be consistent with the development of Greater Blindwells as envisaged within the MIR. Taylor Wimpey controls a significant area of land at Hoprig to the east, within the Greater Blindwells area, and proposals for this land are described in Taylor Wimpey's submission in respect to Greater Blindwells.

Holder Planning on behalf of Taylor Wimpey Plc: Taylor Wimpey broadly supports the content of the MIR in respect to the land identified as 'Blindwells East (PM/PP/OTH003)'; however it considers some of the key principles identified in the MIR are too rigid to provide a sufficiently flexible context for delivery. Land at Hoprig Mains should be allowed to progress as an early phase of development, taking advantage of the existing road junction capacity that exists at Macmerry whilst unburdening the development of early costs associated with expensive road infrastructure. A new secondary school is supported by the representation and it provides options for delivering this and housing on this site. If necessary and appropriate, the existing allocated site can progress on the basis of shared infrastructure costs with the following options. Two possible development patterns are presented depending on the availability of Martin Stevens land. In both scenarios Blindwells West and the Hoprig Mains land would be developed as new communities, linked by common major infrastructure. In the first scenario, these two communities would coalesce in the longer term to form a large new town. In the second scenario, a larger community would be created by way of the Hoprig Mains community expanding to the east on to Hoprig Farm:

- Option 1: Hoprig Mains - The development a new settlement (2000+ homes) in the eastern area of Blindwells focussed around Hoprig Mains which would provide for its own infrastructure and would both contribute to and utilise a new secondary school in the western area of Greater Blindwells, with connections through Greendykes Farm, with the intention that over time there is opportunity for the two development areas to meet;
- Option 2: Hoprig Mains and Hoprig Farm - The development of a settlement in the eastern area of Blindwells at Hoprig Mains with expansion further east beyond the Coal Road to Hoprig Farm. This could be utilised in the longer term if M Stevens' land to the west of Hoprig Mains does not become available for development and it is considered that further development land is in fact required.

If the Greendykes land in the middle of the area identified by the MIR is not available to be part of Greater Blindwells they do not consider that the development pattern that would result would be

significantly less sustainable. The difference would be an undeveloped area between the two new communities. The opportunity exists now to begin development on the Taylor Wimpey land at Hoprig, and this can proceed alongside the currently allocated site and if necessary and appropriate, the two sites can progress on the basis of shared infrastructure costs. It is anticipated that the two communities would both be supported by a new secondary school, perhaps located on land to the east of the current Blindwells allocation. There do however remain some uncertainties regarding the distribution of different types of development within Greater Blindwells, the number of access points and the location of secondary education which require to be addressed in discussion with the Council. Representation requests that Blindwells West and Hoprig Mains are allocated for development in the Local Development Plan, with allowance for both sites to be developed simultaneously. An agreed masterplan should ensure that the Blindwells and Hoprig communities are developed in a fashion that allows coherent expansion in accordance with both Options 1 and 2 above. They currently have confirmation from Mr Stevens and his agent that the Greendykes land will be available for development, but if it becomes clear in advance of the publication of the Proposed LDP that this is not the case and there is a lack of clarity regarding this, then there is an opportunity for the LDP to consider Option 2 and in this regard we recommend that the two potential expansion areas (i.e. the Stevens land and the land to the east of Hoprig Mains) should be safeguarded in the LDP for potential future development. Taylor Wimpey has an informal indication from the landowner east of Hoprig Mains that the land would definitely be made available for development if required.

Gladman Developments Ltd Homes for Scotland confirmed, at the recent meeting to discuss the Draft 2014 Housing Land Audit, they consider Blindwells to be constrained, on this basis it should not be included in the effective land supply. Careful consideration must be given to: the required remediation; development viability of the site; housebuilder interest; and whether it will actually provide completions before 2024 before continuing this allocation or any expansion to it into the Proposed LDP.

Ashfield Land c/o Scott Hobbs Planning Limited has reviewed the options in relation to secondary school provision in the context of the Blindwells new settlement and is supportive of the options as outlined at paragraph 6.101 of the MIR. In the absence of a new secondary school being necessary at the Blindwells site, Preston Lodge High School, is the appropriate destination for pupil product arising from the Blindwells new settlement given its relative proximity to the Blindwells site.

Geddes Consulting on behalf of Hamilton & Kinneil Estates and Hallam Land, Sirius Sport & Leisure states that it is difficult to accept that Blindwells will deliver any significant housing completions in the period up to 2024. It is premature at this stage to consider the expansion of Blindwells beyond 1,600 homes in any great detail at this stage, particularly where other effective sites may be delivered. A decision to expand the scale of Blindwells is not necessary until post 2024.

Geddes Consulting on behalf of Wallace Land and Gladys Dales Drylawhill Trust states that the site has been allocated for some considerable time and is generally considered to be non-effective because of the need for significant and front loaded infrastructure costs together with substantial costs to deliver NHBC approved ground conditions on this former opencast site.

Persimmon Homes believe it to be more logical to give consideration to two smaller allocations across East Lothian, which would allow for a greater choice of new homes to be built and allow the deliveries required by East Lothian to be met more easily. Whilst it is seen that suggestions have been made by the Council as to how they envisage deliverability, this creates uncertainty for developers in terms of what will actually be required, in terms of any developer contributions and physical land requirements. In this respect, it is suggested that East Lothian Council need to provide

significantly more information, in an open and co-ordinated manner, as to their aspirations and requirements and what they wish to achieve and how they wish to achieve it. Nothing has happened in the past 7 years since the site was allocated. It is believed that East Lothian is placing too much emphasis on a site which the development industry believe to be severely constrained by flooding issues and land ownership issues.

Cardross Asset Management Ltd states that there are severe constraints on the economic viability of Blindwells that could result in the site being incapable of delivery within the life of the LDP. On that basis it would be highly dangerous for ELC to assume this site will be delivered. An alternative housing site could be Cockenzie Power Station and surrounding land.

Rick Finc Associates on behalf of Hallam Land and owners of site at Letham Mains Holding Haddington Given the uncertainties associated with this site Hallam land cannot support the Preferred Approach being taken to Blindwells as part of the MIR and LDP process. Blindwells (neither the committed or extension area) does not pass the 'effective' test, as prescribed in PAN 2/2010. It cannot be demonstrated that within the five year period from the 2013 Housing Land Audit that any of the land will be developed and that "residential units will be completed and available for occupation" (PAN 2/2012). In summary, our clients do not agree that the LDP should rely so heavily on the promotion of a new settlement at Blindwells. The current allocation of 1,600 homes is not currently deliverable or effective and the deliverability of any extension is severely restricted by, amongst other things, landowner willingness and should not be considered within this LDP period.

Ryden on behalf of the Wemyss & March Estate The work WME/SCC has undertaken in response to the MIR has demonstrated that the existing allocation of 1600 allocation and Longniddry South are both complementary allocations. The latter does not undermine the delivery of the former. Nor would the impact of Longniddry South prevent the expansion of Blindwells beyond 1600 homes. Furthermore, the expansion of Blindwells will be critical to its ability to deliver its own secondary school on site. It is also recognised that a larger development is more likely to deliver a settlement of quality and of substance, rather than a large service-free housing estate.

Colliers on behalf of Taylor Wimpey and Mactaggart and Mickel potential for significant eastern expansion of the existing proposed settlement would infringe on greenfield land to a very large extent. In this respect it is probable that such a development would lead to significant effects in both landscape and visual terms.

TMS Planning on behalf of Roy Mitchell Design Ltd The extent of the search area for the Blindwells expansion is unnecessarily constrained. The option to use adjacent (and fully integrated) land to the south of the A1(T) is not presently being considered albeit this was part of the former mine operation and has similar characteristics to the presently identified Local Plan allocation.

George F White LLP on behalf of Mr D Lockie are concerned with the ability to bring all of the required infrastructure and housing forward within the plan period. Our Client therefore strongly suggests the need for other smaller developments to be brought forward within the western area of the East Lothian SDA, such as Macmerry.

PPCA Ltd on behalf of Wallace Land Investments make representations to the continued reliance on Blindwells as a development location given that there has been little or no movement in delivery of the proposal since 2001. All that this does is prevent other, more deliverable, locations being identified that will help maintain a five year housing land supply.

Bourne Leisure Ltd c/o Nathaniel Lichfield & Partners For any development proposed, we would

encourage the Council to include under 'Mitigation', a requirement to assess and mitigate against development which could adversely affect the operation or future development of tourism in the area.

Community Councils and local interest groups

Prestonpans Community Council supports the preferred approach in general. We have some concern that the expanded site (shown in blue on the plan on page 158 of MIR) will swallow up a great deal of prime agricultural land, and wonder whether the site should be as extensive as this.

Haddington and District Community Council support the Preferred Approach of a new town at Blindwells. Believe that in order to achieve greater investment in infrastructure that a larger build programme for Blindwells is proposed.

Gullane Community Council We support the proposed new town at Blindwells, as being consistent with the strategy of concentrating development within the western part of the SDA. In particular we think it is clear that significant new housing provision at Blindwells would relieve the pressure to provide an unacceptable level of additional housing in the more rural parts of the local authority area, including our community council area. We also think that it would render it unnecessary for the Council to promote the large-scale development at Fenton Barns which is postulated in the Report, which for reasons indicated below we think would be disastrous for the amenity of the area.

Dirleton Village Association We support the proposed new town at Blindwells, as being consistent with the strategy of concentrating development within the western part of the SDA. In particular we think it is clear that significant new housing provision at Blindwells would relieve the pressure to provide an unacceptable level of additional housing in the more rural parts of the local authority area, including the North Berwick coastal strip. We also think that it would render it unnecessary for the Council to promote the large-scale development at Fenton Barns which is postulated in the Report, which for reasons indicated below we think would be disastrous for the amenity of the coastal strip. We are however concerned that if development takes place in Longniddry, to the south of the railway line, this could lead to the coalescence of Blindwells and Longniddry. The Council would need to ensure that adequate infrastructure was in place to support such coalescence. We are also concerned that, if significant development takes place at Blindwells and south of Longniddry, as well as in the Wallyford area, this would put considerable strain on the road network, including in particular access to the A1 at the Musselburgh, Tranent and Macmerry interchanges, and further west at the Old Craighall interchange, and that these would all require significant upgrading.

Association of East Lothian Day Centres believes that the site at Blindwells is the most appropriate location for larger scale development to satisfy longer term needs and be a positive asset to East Lothian and reduce the impact of a commuting population.

Bolton Steading Residents Association concerned about the social impact of such a large development and the proposed town centre. A similar approach has been adopted at many locations around Scotland with very mixed results. We would suggest that the council establish a working party including representation from house builders and retailers to look at this in more detail.

Members of the public

- Need for shops, a primary school and community centre. A GP practice would be needed; Government should provide the infrastructure; the existing road network will not cope;

- Should be returned to agriculture as promised;
- Don't concentrate pollution, traffic, demands on services etc into one area which will then be unestablished, faceless, lack connections with local people and communities;
- While I support the site the number of houses is too large. As indicated in my other answers there needs to be greater rail services to Edinburgh to support such a large development;
- Allocating land for up to 5000 house with so many unresolved issues will set a dangerous precedent;
- With the lack of a train station it is likely that most journeys will be made by car putting increased pressure not only on local roads but also the Edinburgh end of the A1.
- Three way phasing as suggested in the preferred approach could lead to piecemeal development. If circumstances change then East Lothian could be left with a severely compromised development.
- Fully detailed solutions and designs for the entire site cannot be finalised until ground conditions are known, and that is impossible at present in time for the LDP to be drawn up and adopted;
- A smaller area of Blindwells might be suitable for development. We would propose more, smaller clusters further east into East Lothian;
- A generally negative view that development is possible because of physical site constraints (hydrological and geological restraints);
- Planned road layout for the new development is ill thought out and will not cope with some 1600 houses.
- leading to almost total coalescence of settlements from Edinburgh's city centre to Longniddry
- The alternative would be a much smaller development to the south of Longniddry Railway Station;
- Encouraging developer interest in this area should take precedent over opening up other sites outside the SDA which the developers would cherry pick;
- Strain on primary schools, high schools and medical centres in the towns/villages of Tranent, Longniddry, Prestonpans and Cockenzie and Port Seton. The roads in these areas would also be unable to cope with the amount of traffic generated from such a large development;
- Too much scope for unnecessary development before 2032 on prime farmland and risks turning this area into a suburban sprawl along the A1, and further overload the roads into Edinburgh. The development would have no real identity and would destroy the landscape and setting, including views to and from listed buildings and scheduled monuments, including St. Germain's and Seton Collegiate Church;
- Develop the site as a green area, parkland, cycle routes, walkways to promote health
- if there is continued pressure from Edinburgh to provide housing for its commuters, it's probably better that they go to Blindwells rather than expand other existing settlements to their detriment;
- The beauty and appeal of East Lothian around Longniddry will be lost forever if such huge developments were given the go ahead;
- We would prefer that the new housing is spread out over East Lothian, along the A1 corridor as much as possible. We feel further expansion of Blindwells will result in traffic congestion, especially around the A1 slip road to Port Seton;
- The site lacks sustainability in terms of logistics, transport, and would depend on car based commuting. It is important to protect against unsustainable growth in car based commuting;
- Fit for purpose schools should be built and funded by developers;
- Educational facilities need to be located in the centre of any large development in order promote community cohesion and reduce car based travel;
- Additional Education requirements that arise because of Blindwells should be contained within the New Settlement as part of the development plan and funded by the developer and Edinburgh DC, since it's their SDP imposition that's creating this problem in the first place;

- Longniddry south would be the logical site for new education. The funding for this should be from Scottish Government and ELC in the main;
- We would like to see a primary school built at the new Blindwells settlement as this will reduce the burden on Cockenzie Primary School, and keep class sizes to a manageable level;
- There are a number of local options which could be consider with the addition of an Annex solution at the old Tesco or Bruntons site which have the potential to provide addition education resources within manageable distance constraints, whilst maintaining a single school. There would also potentially alleviate the current issue with the Private Investment in place at Musselburgh Grammar school. Therefore such funding could be used to fund a new secondary school supporting the new proposed Blindwells settlement and surrounding area;
- There should be a definite rather than provisional plan for a secondary school on the site rather than placing excessive pressure on nearby Ross High and Preston Lodge;
- There is no point in considering delivery mechanisms until viability can be demonstrated - can this site be delivered by 2024? If not it should not be in the LDP;
- The Longniddry South development should be considered as a possible satellite settlement for Blindwells without it being integrated into Longniddry. It is delimited by the rail line. Some thought should be given to the longer term inclusion of a retail park to act as the preferred East Lothian site for this;
- Blindwells should be renamed Charlestoun and a comprehensive conservation of the Riggonhead Defile included. It will have the great benefit of giving the new community an immediate sense of its history as well as the open cast mining;
- There is a chance for high quality town planning and to provide a new town with the best facilities to serve coming generations. This chance should be taken and the site not compromised on for maximum housing in the cheapest shorted time;
- Given the extra cost involved in developing brownfield sites, there is a danger that the easier part of the site (i.e. the eastern portion) will be developed before the more difficult, previously open cast mining area;
- I cannot see any significant employment opportunities at this site;
- If a rail halt cannot be provided, we think that Park and Ride provision in the new settlement would be essential to link with existing services on the North Berwick rail line.

Education Matters:

Developers/Landowners comments on education

Persimmon Homes: Education remains an issue within all regions of East Lothian. Given East Lothian Council are the only people who can tell the developers what will be required, they should also be telling developers how they want to achieve it, rather than leaving it as an open ended question with no obvious answer. Whilst it is seen that suggestions have been made by the Council as to how they envisage deliverability, this creates uncertainty for developers in terms of what will actually be required, in terms of any developer contributions and physical land requirements. In this respect, it is suggested that East Lothian Council need to provide significantly more information, in an open and co-ordinated manner, as to their aspirations and requirements and what they wish to achieve and how they wish to achieve it. Persimmon suggest that all education provision should be provided on and by the site and should have no impact on any existing education facilities outwith the site boundary.

Cardross Asset Management: Longniddry south would be the logical site for new education. The funding for this should be from Scottish Government and East Lothian Council.

Turley on behalf of Hargreaves UK Services Ltd and Mr R Kennedy Our clients are willing to discuss

the range of education requirements essential to this type of development and how these might be facilitated with East Lothian Council. There are several different methods in which the options could be funded. Our clients are willing to gift the land to East Lothian Council at an early stage in the development process so that the Council can commence the construction of education facilities at the appropriate time. This type of arrangement would require a reduction in other developer contributions to reflect this. Should the Council not wish to enter this type of arrangement, our clients would be willing to participate in an excambion (exchange) of land.

Public comments on education

One site primary and secondary school funded by developers;

New schools need to be built as part of the new settlement. - They would help form a new community at Blindwells rather than children having to travel to other areas.

Educational facilities need to be located in the centre of any large development in order promote community cohesion and reduce car based travel.

Given the amount of new housing in the area surrounding Blindwells to the west and south, there is a danger that nearby schools will be expected to take on too many pupils. There should be a definite rather than provisional plan for a secondary school on the site rather than placing excessive pressure on nearby Ross High and Preston Lodge.

KEY MESSAGES

- **Historic Scotland considers that whilst the allocated area and area of search is unlikely to raise any significant concerns, there is the potential that development near the north western boundary may adversely affect the setting of Seaton Castle (formally Seton House) and its associated buildings and designed landscape;**
- **Transport Scotland consider that the access solution should not focus on rail from the outset, and if a new A1(T) Interchange is to be promoted then it will need to be assessed against STAG and DRMB – i.e. justified and technically deliverable;**
- **Sportscotland recognises the potential to design from the outset high quality leisure and recreation facilities including consideration of how these might be integrated with other community facilities;**
- **Scottish Water: supportive of preferred approach since it makes good use of existing assets, but if alternative approaches need be followed then it would be supportive of those too;**
- **Homes for Scotland considers that Blindwells is constrained, and that the existing area and the expansion area cannot contribute to the effective land supply for the LDP period, unless comprehensive solutions are found for addressing infrastructure solutions prior to Proposed LDP;**
- **Coal authority supportive of site redevelopment and recognises scope for environmental improvement;**
- **Network Rail has concerns over the impacts development here would have on St Germain's level crossing;**
- **RSPB considers that any development at Blindwells should mitigate habitat loss, including the wetland habitat at the sites north-western boundary;**
- **The general view of Developers / Landowners within area identified by MIR is:**
 - **Hargreaves and Mr B Kennedy: support the preferred approach; both willing to consider transfer of land at an early stage for provision of education facilities, but in exchange**

would require reduction of developer contributions for other items – an alternative is also suggested where landowners could participate in an excambion (exchange of land) to provide surety that facilities can be delivered in future; feel they can progress together with or independent of the other landowners;

- **Mr Martin Steven:** offers general support for the proposal to extend Blindwells to its full extent as outlined in the MIR, subject to specific consideration of phasing and master planning and a collaborative approach to developing the site by all parties involved;
- **Taylor Wimpey and AWG:** support the continued allocation of existing site and the expansion land to the east, but wish to have flexibility to progress together with or independent of the other landowners;
- **Mr Roy Mitchell (B Kennedy):** considers that land south of the A1 and to the east of Tranent should also be considered as part of the Blindwells expansion area of search;
- The general view from other developers / landowners is that:
 - the site has been allocated for some time but little progress has been made;
 - the site is heavily constrained in terms of ground conditions and flood issues and is not an 'effective' site as defined by PAN 2/2010 and therefore should not be allocated or relied on (existing allocation as well as any expansion), particularly as far as maintaining a five year supply of effective housing land is concerned;
 - even with recent changes in landownership it is difficult to see how the site could be brought forward;
 - there is no need to promote the expansion of the settlement until post 2024, especially when smaller more deliverable sites could be brought forward;
 - there is concern about the use of greenfield land as well as landscape impacts;
 - there is concern over substantial upfront infrastructure costs, including for land remediation and infrastructure costs, that this site would incur when compared to smaller more deliverable sites;
 - there is concern about the council's 'vague' approach regarding developer contributions;
- Community Councils and local interest groups who responded in general support Blindwells and the expansion of it in to the longer term and consider that the site could reduce the impact of commuting, but that it could also introduce negative social aspects (not specified) and result in loss of large amounts of prime agricultural land. They also questioned if the allocation should be as large as suggested;
- Members of the public who responded generally consider that:
 - Blindwells is an opportunity to be proactive in design and produce high quality development for future generations;
 - Blindwells should be renamed 'Charlestoun' and conservation of the Riggonhead Defile included to provide an immediate sense of history in addition to the opencast mining;
 - Development at Blindwells should be encouraged over developing in other parts of East Lothian, particularly locations outwith the SDA;
 - There is a need for additional community facilities, shops and medical services to accommodate this level of growth, and the Government should provide this;
 - There is potential to consider a large new town centre to provide a location within East Lothian for a retail park which may also serve surrounding settlements such as Longniddry provided they do not coalesce;
 - Concern that a three way phasing strategy suggested as an option by the MIR could lead to

piecemeal development;

- **There is concern that the eastern greenfield part of the site will be developed before the western brownfield part;**
- **In terms of education, it is preferred that the new settlement includes developer funded education facilities located centrally, in order to alleviate pressure on nearby schools, but some suggested a location to the south of Longniddry for this;**
- **A definite plan for provision of education is essential, and this should not put pressure on Ross High or Preston Lodge High Schools;**
- **A smaller area at Blindwells may be suitable for development or as an alternative a smaller development to the south of Longniddry rail halt;**
- **If a rail halt cannot be delivered, then a park and ride facility should be provided instead, to link with existing services on the North Berwick line;**

- **Proposed expansion is too large;**
- **Some doubts raised over the potential to introduce employment opportunities;**
- **Development of the site will cause a large increase in congestion on local roads, deteriorate air quality, with rail services unable to support increased numbers of people travelling to Edinburgh;**
- **Site is generally undeliverable/unviable due to ground conditions, with detailed plans an unrealistic aspiration within the LDP period;**
- **Full position on ground conditions needs to be known before any commitment to site given;**
- **Site should be returned to agriculture;**
- **The new settlement would lack its own identity, reducing the beauty and appeal of the area;**
- **Would lead to almost full coalescence of settlements from Edinburgh city centre to Longniddry, and impact negatively on the setting of settlements such as Longniddry;**
- **Development should be spread further along the A1 corridor.**

Issue: Housing Land Requirements & Housing Land Supply (Table 26)	MIR question: Question 18
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Total number of responses on issue	74
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Scottish Government, key agencies, and adjoining authorities

No comments.

National interest groups

Homes for Scotland: consider that the approach taken broadly accords with its understanding of how the housing requirement for the LDP should be calculated. However, the calculations and programming suggests insufficient land being identified not in accordance with SPP or the SDP. East Lothian Council have used the SDP figures as a starting point and have sought to allocate sufficient additional land (over and above established source of supply) to more than meet the SDP requirement. By not combining the first two periods together, East Lothian Council is seeking to ensure the housing requirement in the first SDP period (when the average annual requirement is much higher) will be met in full. This is the right approach to take. The approach accords with Scottish Planning Policy (paragraph 117) which allows for windfall development to be included in housing supply calculations, and it is noted the SDP assumption on this may change in the Proposed Plan. Homes for Scotland would advocate retaining the lower SDP figures. This provides greater flexibility and contributes to the 12% generosity margin. However, Homes for Scotland go on to say that the approach taken does not fully accord with Scottish Planning Policy advice on providing for a generous supply of housing land. No up-front allowance is made for a generosity margin on the 10-20% scale set out in national policy, though the Council has retrospectively calculated (once new site allocations and existing sources are considered) that it has in-effect provided a generosity margin of 12% over and above the SDP requirement for the combined period 2009 to 2024. To be properly in line with SPP and the SDP, the Council should identify, from the outset of its calculations, a generosity margin on 10% to 20% for each of the two SESplan periods, not just the combined period, as illustrated in the table below (which is based on ELCs 12%).

Table 6

	2009-19	2019-24	2009-2024
SDP housing land supply target	6,250	3,800	10,050
12% generosity margin	750	456	1,206
LDP housing land requirement	7,000	4,526	11,256
Effective supply	3,133	1,793	4,926
Constrained sites coming forward	0	0	0
Windfall allowance	220	110	330
Demolitions	0	0	0
Total supply from existing sources	4,674	1,903	6,577
Housing required from new sites	2,326	2,353	4,679
ELC estimated contribution from new sites	2,129	2,779	4,905
	= -197	= + 426	= +226
HfS estimated contribution from new sites	1,031	2,759	3,790
	= 1,295	= +406	= -889

Homes for Scotland take issue that the MIR does not explain why 12% is considered as sufficient generosity margin, and why a more generous allowance has not been made. The effective generosity allowance for the first SESplan period (to 2019) is exceptionally low at just 6% which is well below

the minimum 10% allowed for under Scottish Planning Policy. It is noted this is compensated by a much higher generosity margin in the following plan period (23%). However, Homes for Scotland's view is that the Council should be seeking a generosity allowance in each distinct period, and that this should be at or close to 20% unless convincing justification is given. Based on the 2013 Housing Land Audit, Homes for Scotland suggest that the LDP needs to allocate sites capable of delivering at least 2,326 new homes in the period to 2019, and 2,353 more in the period 2019 to 2024. This amounts to 4,679 new homes across the two periods.

Homes for Scotland has a number of concerns with the programming assumptions for the preferred MIR sites, particularly for the period to 2019. The Council expects 2,126 units to be delivered by newly allocated sites by 2019. Homes for Scotland considers this a too challenging target to achieve just one year after LDP adoption. On the basis of Homes for Scotland's programming work, the emerging LDP will result in an undersupply of 1,295 up to 2019 and some 889 homes overall (due to oversupply in the second plan period) if it allocates only the preferred sites listed in the MIR. This is before any adjustments are made to reflect the emerging 2014 Housing Land Audit.

Homes for Scotland notes that meeting the SESplan housing land targets, and making provision on top of this for a generous land supply, cannot be achieved without a significant increase in annual build rate. It provides the table below which illustrates the combined programming output from established housing land and new allocations set out in the agreed 2013 Housing Land Audit and Main Issues Report (in respect of new sites): the combined total rate of annual completions is shown in the bottom line.

Table 7D: Required Build Rates to Deliver both MIR Preferred Site Programming and HLA 2013 Effective Supply

	14	15	16	17	18	19	20	21	22	23
	15	16	17	18	19	20	21	22	23	24
Effective Supply HLA 13 averaged post 19/20	317	571	531	548	776	574	656	656	656	656
ELC MIR Programming	0	0	708	708	708	483	483	483	483	483
Combined Total	317	571	1,239	1,239	1,484	1,057	1,139	1,139	1,139	1,139

Homes for Scotland also provides the table below which highlights the historic rates of completions achieved between 2004/05 and 2012/13 in the top row, and the forward programme of same for the period 2013/14 – 2018/19 as set out in the agreed 2013 Housing Land Audit (row 2). The bottom rows set out the updated programming assumptions of the Draft 2014 Housing Land Audit as anticipated by the Council (row 3) and by Homes for Scotland (row 4).

Table 7C: Previous Annual Completion Rates Achieved in East Lothian (also showing HLA 201 & 14 estimates for 13/14 to 18/19)

	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18
	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19
Actual Records	518	833	705	327	502	468	381	266	295						
Agreed HLA 13										390	317	571	531	548	776
Draft HLA 14 (ELC)											306	558	774	641	655
Draft HLA 14 (Hfs)											297	382	538	399	414

Homes for Scotland acknowledge that meeting the SESplan housing land targets, and making provision on top of this for a generous land supply, cannot be achieved without a significant increase in annual build rate. It recognises that the Council cannot control what the market is able to or seeks to deliver in any given year, but that the Council give the market the best possible opportunity to

maximise the contribution it can make to meeting East Lothian's housing requirements. In light of the significant increase in production needed to implement the SDP and LDP housing, Homes for Scotland suggest that East Lothian Council should:

- Plan for a generosity allowance at the upper end of the 10-20% scale recommended by Scottish Planning Policy
- Allocate a range of sites, including in terms of size, location and type (greenfield / brownfield) – being flexible in respect of any preferred spatial strategy if this will help deliver houses in the volumes needed
- The above will require the identification of a range of sites over and above those already identified as preferred sites in the MIR.

Homes for Scotland strongly urge East Lothian Council to review its current approach to planning for new housing in the area, in particular in respect of development management decisions on windfall housing sites. If this were an active and declared strategy to help address East Lothian's housing shortfall then there would be more justification for the Council's optimistic early programming of delivery on new sites.

Landowners, developers and agents

Walker Group: Walker Group are advised by Homes for Scotland that the approach taken accords with their understanding of how the housing requirement for the LDP should be calculated. HfS confirm that East Lothian Council is seeking to ensure the housing requirement in the first SDP will be met in full so housing will be delivered when it is needed. This is the right approach to take.

Montagu Evans (Land east of Aberlady / Pref M4): Our client submits that the effective housing land supply should be adequately reflected within the Main Issues Report and if there are sites that were allocated within the East Lothian Local Plan 2008 which are not coming forward for development, alternative sites should be found.

Rick Finc obo Owners of land at Letham Mains Holdings, Haddington (Site 4FD): The Cluster Analysis Summary of Housing Land Requirements and Housing Land Supply in Table 26 is a useful start to identifying a generous supply of land in the context of maintaining a five year supply, as required by Scottish Planning Policy. However, using information from the draft HLA for 2014 our client is less optimistic. The HLA report suggests that East Lothian Council, realistically, needs to allocate a further 2,249 homes (33% of LDP requirement) for the period up to 2019. For the period 2019 to 2024 the HLA suggests an additional 2,544 units (61% of LDP requirement) will be required to maintain an effective supply. Within the Haddington Cluster the draft HLA 2014 estimates that a total of 1,127 committed units remain to be built, with 488 identified for construction by 2019. Of the 537 units allocated as preferred sites within the Haddington Cluster only 245 are anticipated to be delivered up to 2019. In total this then suggests that from 1,664 units only 733 (less than half) are likely to be effective. Our client therefore concludes there is a substantial shortfall of effective sites throughout East Lothian.

Rick Finc Associates obo The MJ and V Rennie Trust (Sherriff Fields, West Barns): The Cluster Analysis Summary of Housing Land Requirements and Housing Land Supply in Table 26 is a useful start to identifying a generous supply of land in the context of maintaining a five year effective housing land supply, as required by Scottish Planning Policy. Using information from the Draft HLA for 2014 the Trust is less optimistic regarding the land supply coming forward in East Lothian over the period up

to 2024. We estimate that the target for the MIR is at least 3,300 houses up to 2019 and over 6,300 houses up to 2024. On this basis the MIR will need approximately 2,250 new houses to be identified for the period up to 2019 and approximately 2,770 houses overall up to 2024. Only 2,030 units are expected to be completed by 2019 and a further 1,006 in the period up to 2024. This indicates a substantial shortfall throughout East Lothian. It would be useful to see how the contribution from preferred MIR sites is allocated on a cluster basis in relation to population and housing need. The Dunbar Cluster is a fairly well defined functional area for delineating appropriate housing and educational catchments in a self sustaining manner. The Trust would however wish to see a breakdown of these figures in relation to Dunbar. Within Dunbar it is estimated that 836 units remain to be built with 543 identified for construction by 2019. Of the 770 units allocated as preferred sites as part of the Dunbar Cluster only 150 are anticipated to be delivered up to 2019. It is our view that the contribution from the established housing land supply is likely to have been overstated. The contribution from Blindwells is uncertain, as previously mentioned, and accounts for over 700 houses over the period to 2024.

Rick Finc Associates obo Hallam Land (Dolphingstone Farm, Prestonpans): Hallam questions the rationale and boundaries of the proposed clusters adopted by East Lothian Council in the MIR analysis. There is no real justification for these sub divisions and in the case of Prestonpans the cluster has no new housing allocated. This appears to be contrary to the Aims and Objectives and the approach being taken through the LDP. Hallam is not supportive of the fact that the requirement for houses in Prestonpans appears to have been removed from the cluster and transferred to the Musselburgh Cluster (in the case of PREF- M9) and Blindwells to a lesser extent. In addition these sites are earmarked for infrastructure provision that is derived from the Prestonpans Cluster. We see this as being contrary to sustainable development principles. Table 26 in the MIR presents a summary of Housing Land Requirements and Housing Land Supply. It also claims to set out the rate of housing development anticipated in order to maintain a continuous supply of effective housing land. However, information from the draft Housing Land Assessment already deems this information to be deficient and out of date. It would be useful to see how the contribution from preferred MIR sites is allocated on a cluster basis in relation to population and housing need. Information from the draft HLA 2014 indicates that there is a shortfall of 2770 units in East Lothian up to 2024 with the majority of this (2250) being identified in the period up to 2015. Using the draft HLA for 2014 Hallam is less optimistic. This is largely due to revised programming assumptions and the level of constrained sites within the 2013 Audit. The target for the MIR is at least 3,300 houses up to 2019 and over 6,300 houses up to 2024. Only 2,030 units are expected to be completed by 2019 and a further 1,006 in the period up to 2024. This indicates a substantial shortfall throughout East Lothian. On this basis the MIR will need approximately 2,250 new houses to be identified for the period up to 2019 and approximately 2,770 houses overall up to 2024.

The Co-Operative Group (Kingslaw, Tranent) c/o GL Hearn: We would suggest that in order for the housing land supply to be truly generous, and not open to challenge, we would urge the Council to apply 20% generosity. This has been supported through recent LDP Examinations. The Co-Operative Group site (ALT-T5 and ALT-T6) at Tranent could help contribute towards this generous land supply.

Gladman Developments Ltd (General Response / Lempockwells Road, Pencaitland): Table 26 of the MIR shows the separate periods and demonstrates how the requirement for each period could be met, it accords broadly with how the housing requirement should be met. However, two planning periods, namely 2009-2019 and 2019-2024, have different requirements both of which are to be met and this should be continued to the Proposed LDP. Additionally, SPP requires a robustly evidenced generosity margin to be included within the housing land requirement, which the Lothian LDPs should add. Table 26 also demonstrates a 12% generosity margin, this however appears arbitrarily chosen. SPP, in para 116 and Diagram 1, requires the margin to be robustly evidenced and to be

included in the housing land requirement before then checking it against supply. Table 26 also omits how the 5 year housing land supply is calculated. This should be included in the LDP to demonstrate the plan is compliant with SPP. The 5 year housing land requirement is calculated by adding 5 consecutive years of annual requirement together and comparing it against programmed completions for the same period. East Lothian is required to achieve 6,250 units in period 2009-2019 and 3,800 units between 2019-2024. Each planning period has a different annual target, which requires to be revised annually throughout the planning period to account for actual completions and any resulting shortfall or surpluses against the annual requirement. Clearly, the 2015/16 to 2020/21 five year period would run across the two planning periods. In that case the annual requirement for 4 years of the 2009-2019 period requires to be added one year's annual requirement of the 2019-2024 period. A demonstration of how the 5 year housing land supply meets and maintains the 2019 and 2024 requirements over the lifetime of the plan should be clearly set out in the LDP.

Geddes Consulting on behalf of Hamilton & Kinneil Estates /Wallace Land and The Sir John Hope Executory / Wallace Land and Gladys Dales Drylawhill Trust / Wallace Land / Hallam Land Management / Sirius Sport & Leisure: No. In accord with SPP (paragraph 116 and Diagram 1), the East Lothian LDP is required to identify a housing land requirement. The respondent suggests that the methodology for its calculation is as follows. The housing supply target is identified from the strategic development plan. A generosity allowance of between 10% and 20% is then added to the housing supply target to provide the housing land requirement. A robust explanation of the adopted generosity allowance is required. Table 26: Housing Land Requirements and Housing Land Supply identifies generosity as a factor of housing land supply rather than the application of a generosity allowance to the SESplan housing supply target. Table 26 therefore fails to determine a housing land requirement in accord with the provisions of SPP. Taking proper account of the generosity allowance of between 10% and 20%, the LDP needs to identify a housing land requirement of between 6,875 and 7,500 homes in the period 2009-19 and 4,180 homes and 4,560 homes in the period 2019-24 (See table below).

	Generosity Allowance (10%)		Generosity Allowance (20%)	
	2009-19	2019-24	2009-19	2019-24
Housing Supply Target	6,250	3,800	6,250	3,800
Generosity Allowance	625	380	1,250	760
Housing Land Requirement	6,875	4,180	7,500	4,560

A supporting document Assessment of the Housing Land Supply has been submitted to suggest issues arising from the Council's approach, including the need to take into account the programming for development of existing and new sites, the lack of contribution from constrained sites (2964 in total, including Wallyford and Blindwells) and to highlight the need to justify any anticipated contribution from windfall sources. In their view, their analysis suggests that the number of allocations required in the Proposed Plan is between 2,964 homes and 3,589 homes for the period 2009-19. The number of allocations required in the Proposed Plan for the period 2019-24 is between 3,067 homes and 3,447 homes. This is dependent on an appropriately justified generosity allowance. Taking account of the programming of the Preferred MIR Sites, which are yet to be determined as effective, the number new allocations required in the Proposed Plan in addition to the Preferred MIR Sites is in their view between 2,029 homes and 2,654 homes for the period 2009-19; the number of further new allocations required in the Proposed Plan for the period 2019-24 is between 392 homes and 772 homes (See table below).

		Generosity Allowance (10%)		Generosity Allowance (20%)	
		2009-19	2019-24	2009-19	2019-24
Setting the Housing Land Requirement					
	East Lothian Council Housing Supply Target	6,250	3,800	6,250	3,800
<i>plus</i>	Generosity Allowance	625	380	1,250	760
<i>equals</i>	LDP Housing Land Requirement	6,875	4,180	7,500	4,560
Meeting the LDP Housing Land Requirement					
	Housing Completions 2009 -13	1,321	0	1,321	0
<i>plus</i>	Effective Supply	2,370	1,003	2,370	1,003
<i>plus</i>	Constrained sites coming forward	0	0	0	0
<i>plus</i>	Windfall	220	110	220	110
<i>plus</i>	Demolitions	0	0	0	0
<i>equals</i>	Total Supply from Existing Sources	3,911	1,113	3,911	1,113
	LDP Housing Land Requirement	6,875	4,180	7,500	4,560
<i>minus</i>	Total Supply from Existing Sources	3,911	1,113	3,911	1,113
<i>equals</i>	Target to be met through Preferred MIR Sites	2,964	3,067	3,589	3,447
Preferred MIR Sites					
	Programming of Preferred MIR Sites	935	2,675	935	2,675
<i>minus</i>					
<i>equals</i>	Additional housing land to allocate in Proposed Plan	2,029	392	2,654	772

The respondent suggests that their assessment demonstrates a critical shortfall of effective housing land in the first plan period to 2019 and that the Proposed Plan needs to focus on complying with SESplan and SPP as well as identifying sufficient effective housing land that can contribute to the effective housing land supply in the short term period to 2019. In their view the consequence of failing to do so is that the Council will not maintain a 5 year effective housing land supply from the date of adoption of the new LDP. This will mean that the policies that influence the scale, location and supply of housing land in the new LDP will be considered out of date in accord with SPP paragraph 125. In these circumstances a presumption in favour of development that contributes to sustainable development will apply through the development management process as set out in SPP paragraphs 29 and 32-35.

Ashfield Land c/o Scott Hobbs Planning Limited: Table 26 appropriately sets out the calculation of the SESplan housing land requirement as it relates to East Lothian. Ashfield Land considers, however, that the Goshen Farm site can make a greater “contribution from preferred MIR sites” in the 2009 to 2019 period and considers a total of 300 units instead of the current figure of 125 units be included in Table 13. In the 2019-2024 period the figure for Goshen Farm should be 700 instead of 375.

Miller Homes / Stewart Milne Homes / Mr A P Dale & Mr R F Dale (Port Seton Links) c/o Holder Planning: The respondents suggest that the preferred approach identified within the Main Issues Report is not consistent with the SDP, its associated Supplementary Guidance on Housing Land or SPP, as there are not enough preferred housing sites identified. In addition, there are not enough housing sites to provide for the maintenance of a 5-year housing land supply at any point in the plan period. The Supplementary Guidance sets housing supply targets for East Lothian for the period 2009 – 2019 of 6,250 homes and for the period 2019 – 2024 of 3,800 homes. The East Lothian LDP is required to provide for sufficient housing land such that these numbers of houses can be built within the time periods identified. To ensure this happens, SPP requires an additional margin for generosity to be added to the Housing Supply Target. The response suggests that a further 10 – 20% generosity allowance should be added to the requirements set for the periods 2009 – 2019 and 2019 – 2024 by the SDP and Supplementary Guidance on Housing Land.

Table 1 –East Lothian – Housing Demand & Supply

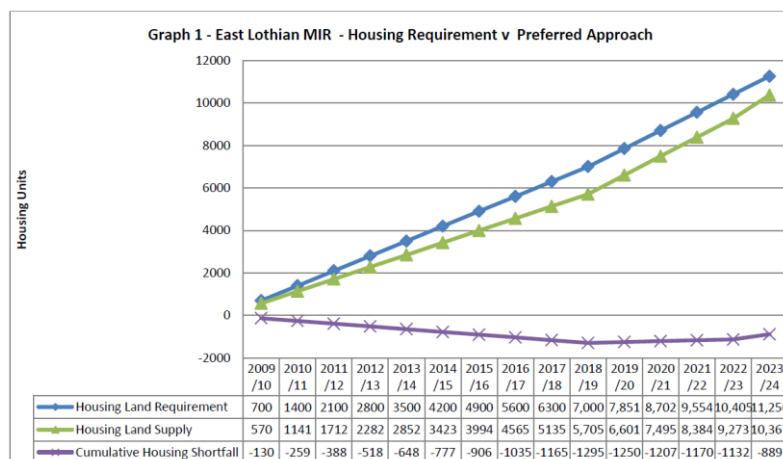
Setting the LDP Housing Land Requirement	2009 – 2019	2019 - 2024	2009 - 2024
(1) Housing Land Supply Target	6,250	3,800	10,050
(2) + 12% to ensure a generous supply	750	456	1,206
(3) LDP Housing Land Requirement	7,000	4,256	11,256
Meeting the LDP Housing Land Supply Target			
(4) Effective Supply	3,133	1,793	4,926
(5) Constrained Sites coming forward	0	0	0
(6) Housing Completions 2009-2013	1,321	0	1,321
(7) Windfall	220	110	330
(8) Demolitions	0	0	0
(9) Total Supply from Existing Sources	4,674	1,903	6,577
(10) LDP Housing Land Supply Target	7,000	4,256	11,256
(11) Total Supply from Existing Sources	4,674	1,903	6,577
(12) Housing Required from New Sites	2,326	2,353	4,679
New LDP Allocations			
(13) Total MIR Preferred Allocations	1,031	2,759	3,790
(14) Shortfall/ Surplus	- 1,295	406	- 889

The MIR undertakes a similar assessment in Table 26 ‘Housing Land Requirements and Housing Land Supply’ (p175) to the analysis contained in Table 1. However, Table 26 identifies a surplus in both periods. In the period 2009 – 2019, it shows a surplus of **356 homes** and in the period 2019 – 2024 a surplus of **882 homes**. Over the plan period it calculates a total surplus of **1,238 homes**.

The MIR states that this surplus includes a generosity in the land supply to 2024 of 12%. The assessment contained within Table 26 appears to be incorrect in two key respects:

- The MIR overestimates housing delivery from the preferred sites;
- The methodology is incorrect, as the generosity margin has not been applied separately to the two periods i.e. 2009 – 2019 and 2019 – 2024. The effect of the approach taken in Table 26 is that only 5.7% generosity is applied to the first period, when it should be a minimum of 10% specified in Scottish Planning Policy.

The delivery of housing that can be expected from the Proposed LDP, using the assumptions made in Table 1, is illustrated in Graph 1 below, which at no point in the lifetime of the LDP will there be supply of housing sufficient to meet the housing requirement:



A significant number of additional housing sites require to be identified in the LDP. As it stands the MIR preferred strategy is inconsistent with SESplan Policy 5, Supplementary Guidance and Scottish Planning Policy. Additional housing sites therefore need to be allocated in the LDP.

Persimmon Homes: Persimmon agrees with the response Prepared by Homes for Scotland, and can confirm we have had input into the production of these. We would however like to highlight that ELC have not met the 20% additional requirement as set out within Scottish Planning Policy, nor have they provided justification for not doing so. SPP also indicates the additional units should be made across any time period as set out within the relevant SDP, in this case SESplan. As it currently stands, ELC only have a 105% supply in the first period, and a 123% additional supply within the second period, giving a total generous supply of 112%.

Cardross Asset Management Ltd: No. This table is predicated on Blindwells happening within part of the LDP period. There is absolutely no guarantee of this.

The Executory of the Late Sir John Hope (The Loan, Musselburgh) / Barratt David Wilson Homes (Limeylands Road Ormiston) / Barratt David Wilson Homes (Preston Mains, East Linton)/ The Traquair Family (Old Craighall Road) c/o Clarendon Planning and Development Ltd: It is considered that this calculation requires amendments prior to confirming the number of units required to be accommodated on new LDP sites. SDP Housing Requirement Scottish Planning Policy requires that local authorities allow for a 10%-20% generosity allowance in addition to base housing land requirements, i.e. East Lothian requires to add a minimum 10% to SESplan targets Total requirement for 2009-19 is therefore 6,875 (2009-19), 4,180 (2019-24) and 4,202 (2024-32). This would provide for an LDP requirement for the period 2009-24 of 11,055 prior to SESplan review. Contribution from Established Land Supply MIR proposes contribution of 2,939 units (2009-19) and 1,793 units (2019-24). Homes for Scotland calculation, based upon draft 2014 Housing Land Audit (subject to final agreement) is 2,030 units (2009-19) and 1,006 units (2019-24) Contribution from Preferred MIR Sites MIR proposes contribution of 2,126 units (2009-19) and 2,416 units (2019-24). HfS calculation, based upon draft 2014 Housing Land Audit (subject to final agreement) is 1,055 (2009-19) and 2,544 (2019-24) Total Housing Land Supply Based upon the most up to date programming set out by HfS (including Blindwells and subject to East Lothian Council agreement), and utilising the Council's figures for completions and windfall, the total is therefore 8,286 units, split accordingly: 2009-19: 4,626 units (1,321 completions + 2,030 est.supply + 220 windfall +1,055 MIR) 2019-24: 3,660 units (1,006 est.supply + 110 windfall +2,544 MIR) Shortfall/Surplus of Housing Land Based on the above, there remains a significant shortfall of: 2009-19: -2,249 units (6875-4626) 2019-24: -520 units (4180-3660).

Dr David Slight (site at Hillview Road, Ormiston) c/o Clarendon Planning and Development Ltd: MIR Table 26 does not provide for minimum 10% flexibility allowance as per Scottish Planning Policy and proposed programming of LDP sites is overly optimistic in terms of pre-2019 delivery.

Wallace Land Investments c/o PPCA Ltd: There is no generosity allowance shown in Table 26. It is not clear where the Council has achieved the 12% allowance referred to in text above the Table. This generosity allowance should be set 20% or even higher. Objection to the assumption that the established housing land supply will be built out in full during the LDP period. Representation is lodged to the completions from preferred Main Issues Report sites for the period to 2019. The Local Development Plan will not be adopted until late 2016 / early 2017. This leaves two years of the first Strategic Development Plan period in which the Council expects delivery of 2,126 units i.e. 1,063 units per annum from this source alone. There were only 1,321 completions in the four year period to 2013. Housing Land Audit expects an average of only 471 dwellings per annum to 2018. The Local Development Plan Main Issues Report bears no resemblance to either the latest agreed Housing

Land Audit or the reality of housing delivery in the East Lothian Council area on that basis. The identification of land capable of accommodating development is one part of the delivery of land for housing in the East Lothian Council area and is dealt with through the Development Plan process. The need to maintain a minimum five year housing land supply at all times is another. The supporting Housing Technical Paper that accompanies this submission sets out a clear and straightforward methodology for calculation of the five year housing land supply and forward programming of housing land. East Lothian Council is currently failing to maintain a five year housing land supply as demonstrated by the accompanying Housing Technical Paper Table 1. This demonstrates a shortfall of 1,753 units based on information provided by the Strategic Development Plan Supplementary Guidance on Housing Land and the agreed East Lothian Council 2013 Housing Land Audit. There is no mechanism put forward in the Local Development Plan Main Issues Report to resolve this despite the fact that Scottish Planning Policy and the Strategic Development Plan requires the maintenance of a minimum five year housing land supply at all times and allows the Local Development Plan to bring forward land within and outwith Strategic Development Areas to do so. The Housing Supply Technical Paper (Tables 2(a) – (d)) further demonstrates that there is insufficient additional land identified moving forwards by the Local Development Plan Main Issues Report to meet housing requirements to 2019 and 2024. Applying a 10% generosity allowance results in an overall shortfall of units in the East Lothian Council area to 2024 of 1,322 dwellings. Applying a 20% generosity allowance the overall shortfall worsens to 2,327 dwellings over the period 2009 – 2024.

Table A: East Lothian Council housing land requirement (Housing Land Audit 2013 with Scottish Planning Policy 10% generosity allowance)

Local Development Plan housing land requirement	2009 - 2019	2019 - 2024	2009 - 2024
Strategic Development Plan land supply target (units)	6,250	3,800	10,050
+10% generosity allowance	6,875	4,180	11,055
Meeting the Requirement			
Effective supply	3,133	3,199	6,332
Constrained site coming forwards	0	0	0
Housing completions 2009-13	1,321	0	1,321
Windfall	220	110	330
Demolitions	0	0	0
Total supply from existing sources	4,674	3,309	7,983
New Supply			
Local Development Plan requirement	6,875	4,180	11,055
Total supply for existing sources	4,674	3,309	7,983
Housing required from new sites	2,201	871	3,072
Programming of preferred Main Issues Report sites (assumed 250 units per annum)	500	1,250	1,750
OVERALL SHORTFALL (-) OR SURPLUS (+)	-1,701	+379	-1,322

Table B: East Lothian Council housing land requirement (Housing Land Audit 2013 with Scottish Planning Policy 20% generosity allowance)

Local Development Plan housing land requirement	2009 - 2019	2019 - 2024	2009 - 2024
Strategic Development Plan land supply target (units)	6,250	3,800	10,050
+20% generosity allowance	7,500	4,560	12,060
Meeting the Requirement			
Effective supply	3,133	3,199	6,332
Constrained site coming forwards	0	0	0
Housing completions 2009-13	1,321	0	1,321
Windfall	220	110	330
Demolitions	0	0	0
Total supply from existing sources	4,674	3,309	7,983
New Supply			
Local Development Plan requirement	7,500	4,560	12,060
Total supply for existing sources	4,674	3,309	7,983
Housing required from new sites	2,826	1,251	4,077
Programming of preferred Main Issues Report sites (assumed 250 units per annum)	500	1,250	1,750
OVERALL SHORTFALL (-) OR SURPLUS (+)	-2,326	-1	-2,327

The emerging Local Development Plan must significantly over-allocate land for residential development to meet housing requirements in the period both to 2019 and 2024. The allocation of land for circa 1,000 units at Fenton Barns will make a significant contribution to supply requirements moving forwards. This situation will worsen given the slippage of land for residential development at Wallyford, Haddington and Blindwells. Supporting documents have been submitted on behalf of Wallace Land Investments.

Barton Willmore: Yes, the table adequately sets out the calculation of housing land supply.

Hargreaves UK Services Ltd and Mr R Kennedy c/o Turley: Our clients are content that the numbers in Table 26 correlate with those numbers identified within the SDP and the associated Supplementary Guidance. The detailed analysis of these numbers is a matter for the Proposed LDP

once the preferred strategy has been confirmed. Our clients would advise that it is likely that housing units at Blindwells could come forward in advance of 2019.

Wemyss & March Estate c/o Ryden: Homes for Scotland has made a submission to East Lothian Council in relation to this issue. SCC is a member of this organisation and adopts their submission as its own in this instance.

Taylor Wimpey and Mactaggart and Mickel (Sites: PREF-H2 and OTH-H8) c/o Colliers: Table 26 is considered to be broadly in accordance with our understanding on how the housing requirements for the Local Development Plan are to be met. There remains however significant concern that insufficient land has been identified through this process. Consequently, it is held that the MIR as presented does not accord with the SPP and the SDP. The approach in which the level of generosity which is to be built-in to the calculation (as prescribed in SPP) is found here to be flawed. It is held that a generosity margin of 10-20% should be built into the calculations for each of the two SESplan defined periods, rather than the approach taken by the Council at Table 26 of combining the two periods and retrospectively calculating the generosity margin. 12% has been included in the MIR as a generosity margin, however there is no justification given as to why this is considered an appropriate figure. Consequently, there is no reasoning as to why a higher figure could not be used. The effective generosity margin in the first SDP period to 2019 is calculated at 6%; significantly below the minimum 10% stipulated in SPP. The fact that the second SDP period has a margin of 23% does not in our view compensate for the shortfall in the earlier period. Ultimately, the Council should be ensuring the generosity allowance in each SDP period is SPP-compliant.

Community Councils and local interest groups

Prestonpans Community Council questions whether sufficient numbers are given for windfall opportunities over the period of the plan. It seems likely that over the 18 years period of the plan, more than 1,238 plots will become available as windfalls.

Gullane Area Community Council do not feel qualified to comment on the technicalities of this table or the statistics contained in it.

Cockenzie and Port Seton Community Council: Yes.

Ormiston Community Council: No Comment.

Dunpender Community Council: No comment.

Dirleton Village Association: do not feel qualified to comment on the technicalities of this table or the statistics contained in it.

Musselburgh Parish Grouping of the Church of Scotland: It would seem so.

Old Craighall Residents and Tenants Association: not sure it can be calculated.

Scottish Green Party East Lothian Susan Moffat: No comment.

Members of the public

- Yes very clear;
- It seems broadly reasonable. However there is a considerable risk of inappropriate and

speculative housing development that may be unnecessary to meet the overall housing requirement to 2024. Therefore the 12% 'generosity factor' should be set at a considerably lower level, otherwise it will become a self-fulfilling prophecy. There is no reasoning presented as to why any 'generosity factor' is required at all or, if it is, what level should be chosen;

- Broadly the approach looks plausible but the devil is in the detail of course;
- It appears to be a reasonable attempt at providing a balance view on how the SDP housing requirement might be met & does include a reasonable surplus;
- If the figures shown are completion requirements on available land for the different time periods in the table, then from historical trends, these completion figures will not be met, so SDP requirements will not be met. If the figures in the table are anticipated completion quantities rather than required ones, then the shortfall, with a fair wind and following tide, could be made up and SDP requirements met. The table, though, is probably a fair representation of how requirements can be met, although there's an element of luck built-in in the form of windfall sites;
- No, table 26 does not set out the proper way of calculating housing requirement. It is misleading and totally inadequate. It needs to be made clear that the Housing Land Supplementary Guidance and the accompanying Technical Note to the SESplan SDP sets out the allocation to 2024 as follows: Established Land Supply and Other Factors, 6,485; new allocation within the East Lothian SDA, 3,560; new allocation in East Lothian outwith the SDA, 0. The figures can then be adjusted to account for updated Established Land Supply and Other Factors but the original target set by the Housing Land Supplementary Guidance needs to be stated clearly and it needs to be quite clear that the extra allocation is supposed to come from within the SDA and not from other parts of East Lothian. In order to demonstrate that the use of Policy 7 of the SDA is solely to provide a five-year effective supply and not to sidestep the SDP's spatial strategy, there needs to be a clear statement of the size of the five-year supply in each future year based on the calculation described in the SDP; and there needs to be a clear annual statement of the current effective supply against the five-year target to show if there is a deficit and therefore a need for Policy 7 of the SDP to be applied. Considering that in any one year it is expected that there will be a five years' future supply, which implies a generosity factor in the region of 400% on the next year's needs, it is hard to see how a further generosity factor is needed;
- Whatever statistics are chosen will prove the point they were collected for;
- The potential contribution from windfall sites needs to be properly in line with a policy which makes best use of existing buildings;
- Planning to build housing estates 'adjoining' e.g. Wallyford, Musselburgh, Tranent and Prestonpans will diminish green belt land substantially and severely impact on travel e.g. Musselburgh Town Centre, approaching roads to Sheriffhall and Milton Road roundabouts are at bursting point. Increase population, assuming an average of 3 persons per new house will impact on existing rail travel - currently there is no capacity to increase;
- The table may well set out the current housing land requirement as far as preferred MIR sites but should go further and have a detailed breakdown of alternative options so as to give members of the public some further clarity. The compact option, whilst preferred by East Lothian Council maybe a further advanced than we are being led to believe;
- As discussed, this expansion of housing at the expense of existing facilities is just too much.
- Given the ageing population and stagnation in the overall population of Scotland as a whole, I am at a loss to understand how it can be necessary to provide such a number of new homes;
- Absolutely not. The National records of Scotland 2010 population projection (published 2012) anticipated that by 2035 East Lothian's population is projected to increase by 33% to around 129,229 the highest percentage rate of growth in Scotland during this period. Why

then does the SDP wish to exacerbate this problem requiring the majority of this increase in the next 10 years;

- the totals in terms of housing provisions requirements by 2019 seem unrealistic relative to current build rates and market interest, and there is a danger of oversupply based on unrealistic predications of growth;
- This table exposes how poorly thought through the plan is. In particular it demonstrates that the target for housing completions is not likely to be met. Also that the existing local plan plus a speeded up Blindwells plus the odd brownfield site will more than cope with a less ambitious target;
- Some respondents did not feel the table was well enough explained and did not understand the issue enough to form a view or to comment;
- Some respondents wanted quality of design and materials in keeping with traditional Scottish, and specifically East Lothian, architecture and more traditional patterns of housing and streets, terraces not focused on car use.

KEY MESSAGES

General Points

- Some respondents supported the approach set out in Table 26, but some did not support it and others did not sufficiently understand the issue to make any meaningful comment;
- Of those who supported the approach the majority felt that it was a reasonable reflection of how the SDPs / Supplementary Guidance on Housing Land Requirement could be met, with some acknowledging that the rate of development that would be needed was very optimistic in light of past trends;
- Those who opposed the approach can broadly be split in to two categories: 1) those who felt too much land was being made available (mostly members of the public) and 2) those who thought not enough land was being made available (mostly landowners/developers/agents):
 - Of those who felt too much land was being made available, one pointed to the 'additional allowances' set out the SDPs Supplementary Guidance on Housing Land as an indication of the amount of new land that should be allocated and where, while others felt that the scale of the Housing Land Requirement in general was unjustified in light of past and perceived future trends and / or would significantly undermine East Lothian's character / amenity / infrastructure;
 - Of those respondents who thought not enough land was being made available, Homes for Scotland acknowledged that a significant increase in annual build rate is required and that the Council cannot control what the market is able to or seeks to deliver in any given year: nonetheless, the main reasons for these respondents views relate to the policy and technical considerations set out below:

Housing Land Requirements & Supply

- Homes for Scotland and the majority of developers / landowners / agents who objected to the approach set out in Table 26 of the MIR are of the view that SDP Policy 5: Housing Land as well as its associated Supplementary Guidance on Housing Land set out Housing Supply Targets, and that they do not set Housing Land Requirements;
- The respondents wish to apply certain aspects of the new SPP (2014) – i.e. those parts of it in respect of 'generosity' where 10 – 20% is to be added to 'the number of new homes to be developed within the plan period' to seek higher Housing Land Requirements for the

emerging LDP;

- The implication of the respondents approach is that new and higher Housing Land Requirements should be set out in the emerging LDP in comparison to those already confirmed by SESplan's approved Supplementary Guidance on Housing Land for East Lothian for each of the SDP plan periods – e.g.:
 - SESplan SG HLR 6,250 homes 2009 – 2019 would = 7,500 homes (@ +20% generosity)
 - SESplan SG HLR 3,800 homes 2019 – 2024 would = 4,560 homes (@ +20% generosity)
 - SESplan SG HLR 10,050 homes to 2024 would = 12,060 homes (@ +20% generosity)

Effective Land Supply

- Many respondents are of the view that the adequacy of the five year effective housing land supply should be calculated taking into account the SDPs 'interim' Housing Land Requirement set up to 2019 separate from the one up to 2024;
- The respondents suggest that the addition of a further 10 – 20% generosity to the Housing Land Requirement is also needed to ensure that a minimum effective five year housing land supply can be maintained at all times;
- Achieving the rate of development needed to meet the Housing Land requirement would need annual completions rates well in excess of that achieved in the area in the past – in some years up to 2019 around treble the historic (04/05 – 12/13) average would be required;
- Some respondents felt that there is a need for more smaller sites which are deliverable in the short term to be brought forward, particularly up to 2019;
- Homes for Scotland acknowledge that a significant increase in annual build rate is required and that the Council cannot control what the market is able to or seeks to deliver in any year;
- If an effective five year housing land supply is not maintained then in line with the new SPP (2014) the LDP policies will be deemed out-of-date and the new SPPs '*presumption in favour of development that contributes to sustainable development*' will apply;
- Some respondents suggest that the allocation of land should reflect need / demand by cluster, while others felt significant land allocations across the whole of East Lothian is the only way Housing Land Requirements may be met;
- The respondents also raise detailed issues, including the programming anticipated from the development of existing sites as well as new potential sites set out in the Main Issues Report;
- They suggest that additional land will be needed over and above preferred MIR sites because of delays in developing the established supply, an increased number of constrained sites (e.g. Wallyford and Blindwells) and because the start date and rate of development anticipated from Preferred MIR sites is too optimistic particularly if planning permissions for them are not approved before the LDP is adopted;

Summary

- Overall, at this stage, the objectors suggest that the effect of adding 20% to the Housing Land Requirements combined with their view on reduced output from the established housing land supply would be a need to allocate more land in addition to the preferred MIR sites which is capable of delivering a further:
 - 2,654 homes in the period 2009 – 2019; and
 - 772 homes in the period 2019 – 2024.

- Annual completion rates well in excess of those achieved in the area in the past in some years up to 2019 around treble the historic (04/05 – 12/13) average would be required;
- Homes for Scotland acknowledge that a significant increase in annual build rate is required and that the Council cannot control what the market is able to or seeks to deliver in any year;
- To give the market the best possible opportunity to maximise the contribution it can make to meeting East Lothian’s housing requirements the respondents generally request that the Council:
 - Plan for a generosity allowance at the upper end of the 10-20% scale recommended by SPP(2014);
 - Allocate a range of sites, including in terms of size, location and type (greenfield / brownfield);
 - Be flexible in respect of any preferred spatial strategy if this will help deliver houses in the volumes needed;
 - Identify a range of sites over and above those already identified as preferred in the MIR.
- Respondents also strongly urge the Council to review its current approach in respect of Development Management decisions on windfall housing sites. If there were an active and declared strategy to help address East Lothian’s housing shortfall then there would be more justification for the Council’s optimistic early programming of delivery on new sites;
- Some respondents also wanted quality of design and materials in keeping with traditional Scottish, and specifically East Lothian, architecture and traditional development patterns.

Issue: Developer Contributions	MIR question: Question 19
Total number of responses on issue	116
Support for preferred approach	59
Support for alternative approach	21
Support for neither approach	19
<p>Scottish Government and key agencies</p> <p><u>Scottish Government:</u> note, as has been pointed out in paragraph 7.11 of the MIR, the ‘reasonable alternative’ may fail the tests of Circular 3/2012;</p> <p><u>Scottish Environment Protection Agency:</u> Neither approach is preferred as this is not an area of SEPA expertise. SEPA notes however that there is a need for site specific, flood risk assessments to accompany and inform planning applications for several sites identified in the Main Issues Report;</p> <p><u>Transport Scotland:</u> In terms of the preferred approach, Transport Scotland is unclear how a cumulative assessment of applications as and when they are submitted can be undertaken. Further detail on this is required to demonstrate its practicality, and to set out how this arrangement would relate to the regional mechanism which will emerge following the conclusion of the SESplan Cross Boundary Study. Other Local Authorities have either taken the approach of identifying infrastructure requirements to deliver the Plan and developed a contribution mechanism for delivery, or identify the mitigation required at the Transport Assessment stage submitted with planning applications, with developers funding necessary improvements on an ‘application by application’ basis. While Local Authorities may elect to develop bespoke approaches, Transport Scotland would require sufficient information to understand how the preferred approach will be implemented to fund and deliver infrastructure.</p> <p><u>Scottish Water:</u> Funding of Scottish Water’s infrastructure is managed out-with the planning system therefore it has no comments on the approach to this issue;</p> <p><u>Midlothian Council:</u> The Compact Growth option will have a more direct impact on the transport constraints but may have more potential to achieve the developer contributions towards resolving these than the dispersed option. Compact growth would introduce cumulative impacts on Old Craighall Junction and the local road network in Midlothian, including in the Shawfair / Newton area as well as from allocations at Whitecraig accessing Dalkeith from the A6094 Salters Road. Potential transport interventions in the Musselburgh and Tranent Clusters are a concern to Midlothian Council. Its proposal for a link road through the Newton Farm site to the A68 / A720 has not been confirmed including any delivery timescale, and the nature of the connection that may arise. At this stage Midlothian Council objects to the provision of any connection from any upgraded junction at QMU to the A68 / A720 through any allocation at Craighall and Newton, even if significant improvement to the operation of Old Craighall Junction would result. Any Tranent by-pass would likewise need to assess the implications of vehicle flows beyond the ELC boundary, including on Dalkeith. The cross boundary impacts of both of these potential transport interventions should be assessed and MLC requests dialog with ELC and Transport Scotland on these issues. The economic sites in Midlothian, in the locality of the Millerhill marshalling yard, would benefit from connections to the A1 via Whitehill Mains Road. MC supports the inclusion of such a link from an upgraded QMUC-A1 junction, subject to measures that restrict access to the Millerhill economic sites only – thereby avoiding unsuitable through traffic flows across the Shawfair development area (to achieve this might require traffic management measures in the MC area). MC would wish to work with ELC</p>	

to further define the outlines of this link. On Education, given the references to capacity issues at Musselburgh Grammar (para 2.36) the potential of shared education facilities at Shawfair should remain under consideration. MLC confirms that any Shawfair Secondary School is unlikely to be delivered before 2032 and that Dalkeith High School will be used short / medium term. MLC is making no provision for cross boundary education solutions at this stage but would welcome further early dialog, otherwise it may be difficult to give consideration to a shared arrangement at a later date. MLC expect to provide for the secondary school needs of Shawfair within its own Council area. MC advises that as with the secondary school provision, it is intended to provide for the primary school requirements of Shawfair within the Midlothian Council boundary;

ELC Countryside: The current approach has merit and as such sometimes it delivers but other times does not: it needs to be clearer and less ambiguous. Policies should be very clear on the need for contributions towards the extent and quality of open space, the green network, and enhancing biodiversity and access;

National interest groups

Royal Society for Protection of Birds: Developer contributions should be sought for biodiversity and habitat creation as well as social and community needs;

Homes for Scotland: Any approach must be consistent with Circular 3/2012 and the preferred approach is truer to the intentions of the Circular's tests. Potential developers should have access to up to date and clear information on what contributions they will likely be asked for. The Proposed Plan should be as clear as possible in terms of what developments in each cluster area, at Blindwells, and elsewhere are likely to be expected to contribute towards. This is essential to the development appraisal, viability and delivery process. If landowners / developers can work with the Council to identify comprehensive solutions for developments in all areas, prior to the suite of new allocations being finalised for include in the Proposed Plan, the plan should be well able to set out a clear stall on developer contributions. Detail should not be reserved for Supplementary Planning Guidance if it can be included in the LDP. Paragraph 7.6 of the Main Issues Report seems to say that the draft Action Programme (which will accompany the Proposed LDP) will set out the infrastructure requirements. This approach would be supported by Homes for Scotland, providing there is sufficient detail for investors.

Network Rail: Support preferred approach. Significant development must be fully assessed in Transport Assessments. The impact and level of improvements required will be specific to each station and development, meaning standard charges and formulae may not be appropriate – establishing this is the role of the Transport Assessment. Many stations and routes are already operating close to capacity and upgrades to the existing infrastructure, including improved signalling, passing loops, car parking, cycle facilities, access arrangements, ticketing facilities or platform extensions, are likely to be required if there is to be a significant increase in patronage. Network Rail is a public organisation and should not be required to fund rail improvements generated by commercial development and developer contributions should be sought for localised development related impacts if not already programmed to be provided by Network Rail. Any LDP policy should also indicate a requirement to consult Network Rail. Additionally, Network Rail should also be exempt from making developer contributions, on the basis that it is a public not-for-dividend organisation providing public infrastructure with profits put back into the railway;

Architectural Heritage Society of Scotland: A roof tax with a contribution for every house, whatever the number, would be equitable, but a high standard of design, both aesthetic and environmental should be required. Uses for contributions could include fuller landscaping, additions to the core

path plan and the Central Scotland network, provision of superfast broadband, and streetscape improvement;

Landowners, developers and agents

General Comments:

- General commitment to pay developer contributions provided the approach is consistent with Circular 3/2012: Planning Obligations and Good Neighbour Agreements, so in reality there is little scope to deviate from the preferred approach;
- Developers and / or landowners should not pay developer contributions if this is intended to resolve situations where there has been a lack of investment in the past;
- The preferred approach is supported as it allows a case by case assessment of a development impact, rather than applying a flat charge to all development;
- Whilst remaining consistent with current legislation, ELC should take the lead in providing (with Scottish Government) the infrastructure necessary for employment and housing sites -it should not insist on funding linked to consents, but should forward fund infrastructure;
- SPP (paragraph 275) requires that the LDP or supplementary guidance... should indicate how new infrastructure or services are to be delivered and phased, and how and by whom any developer contributions will be made – these should be prepared in consultation with all parties involved in approving and delivering the infrastructure;
- Developers need access to up to date and clear information on contributions early in the process – i.e. before planning committee – and pre-application discussion is also important;
- Sites that will be expected to contribute towards delivering infrastructure (and for what infrastructure) should be identified up front in the LDP / Action Programme;
- Cumulative impact and proportional contributions are important considerations, with contributions to be sought only for items that will be listed in the LDP / Action Plan(s);
- Standard changes and formula should be set out in Supplementary Guidance;
- Detail should not be reserved for supplementary guidance if it can be included in the LDP;
- If supplementary guidance is to be used then this should be promoted in line with the Chief Planners letter to Heads of Planning (15th January 2015);
- Flat rate might be indicated up front as an early indication of the scale of contribution so this can be taken into account in viability appraisals etc, but a case by case assessment should nevertheless still be done for each application;
- General support for spreading the payment of contributions over the programme of a particular development if the risks can be managed through the use of a planning obligation - the application of this approach is suggested by individual interests in terms of:
 - the delivery of the remainder of the A1 junction at Queen Margaret Drive to enable the marketing and delivery of the Business and education-led Hub at the University and land to the north-west of Queen Margaret Drive;
 - for secondary education facilities, on the basis that it has been successfully adopted elsewhere at Shawfair in Midlothian.
- It was noted that developers transfer the cost of contributions directly to the landowners and seek to retain the same level of profit as the bank will require in order to fund development – developer contributions may not be the appropriate terminology;
- Payment of developer contributions does not encourage small rural developments if the servicing costs are prohibitive relative to the likely return - this encourages larger developments and not local contractors and building firms;
- Suggested extension of developer contributions to provision of broadband, if appropriate;

- Further comments will be made once further information is available on contribution levels;

Preferred Approach

- Case by case approach preferred by some as this is the only clear and transparent way of linking development to its impacts;
- The preferred approach is supported in terms of applying developer contributions on a site by site basis, with thresholds and requirements set out in policy. It should be noted however, that whilst the MIR states that front-funding of infrastructure (and associated recouping of costs over time via contributions) may not be an option for the Council, it is clear from best practice examples in both the UK and Europe that this is indeed the optimum way of delivery. In this respect, further dialogue is required between local authorities, the Scottish Government and institutional funders to resolve this problem;
- Significant infrastructure may be required during the early phases of development and a more collaborative approach may be required in order to facilitate delivery;

Alternative Approach

- Ashfield Land is supportive the Reasonable Alternative as it relates to developer contributions, particularly in relation to the delivery of options a, b or c at para. 6.15;
- Preference for a flat rate developer contribution/roof tax if the contribution sought could be fully justified and meet the tests outlined in Scottish Government Circular 3/2012;
- The imposition of a flat roof tax would not facilitate development in circumstances where local market / site conditions dictate that a significant upfront investment is required by the land owner or developer to initiate development;
- Whilst a 'flat-rate' approach has merit in terms of certainty for local authority, developer, landowner and community, the application of this approach would be of major concern as it would hinder development in the short term. Given the housing land supply situation in East Lothian this approach is not suitable;

Community Councils and local interest groups

Prestonpans Community Council favours the preferred approach as it provides more flexibility in dealing with each proposal - ELC should seek to make deliverable all currently consented sites as a priority over allocating more, to avoid blighting areas of the county;

Dunbar Community Council suggest that developers have too strong a hand and the experience of Beveridge Row has left a very bad feeling both towards the developer in question and the planning process in its entirety. The community feels that:

- Developers should be made to contribute to the infrastructure needs brought about by new development;
- The Roof Tax (a contribution per unit) seems an interesting model whereby every developer makes a contribution to the infrastructure funding even if the development is for a small number of houses;
- developers should be pushed to work to high standards of design both aesthetically and environmentally;

Dunpender Community Council would like to see a developer contribution based on a percentage of the value of each house to be built;

Humbie, East and West Saltoun and Bolton Community Council supports the alternative approach. A flat rate (which may have different parts to recognise different development scenarios) is a simpler system and can be easily understood by all. Furthermore it removes the need for lengthy and protracted negotiations between developers and the Council. The current Section 75 process is not transparent and doesn't necessarily lead to improvements in the local area. We would recommend that Section 75 contributions are kept in the Ward area and that communities (through the Area Partnership) should have the final say in how this money is used;

North Berwick Community Council suggest the reasonable alternative could allow for a more accurate assessment and might be more transparent;

Dunbar Area Partnership is supportive of the Reasonable Alternative as the Preferred Approach results in bias for small sites so developers don't have to provide schools;

Ravensheugh Tenants and Residents Association, Ormiston Tenants and Residents Association, Windsor Park Tenants and Residents Association, Wingate Tenants and Residents Association, Tranent Tenants and Residents Association, Goose Green Tenants & Residents Association Musselburgh and Dunbar Shore Harbour Neighbourhood Group all agree that this process right is vital to the future infrastructure and decision making on many local services. They request far more transparency and community access to decision making on developer contributions and that they, on the basis of the Housing Scotland Act 2001, are included and involved in decisions about section 75 developer contributions so tenants and residents are informed and asked for their views on developer contributions;

Bolton Steading Residents Association agrees with the comments made by the Humbie, East & West Saltoun and Bolton Community Council. Additionally, there is a need for review so they can be assured financial contributions will be ring fenced and used for the purposes intended. They have concerns that, given the very high infrastructure costs associated with proposed housing developments there will be a requirement for very high contributions in the absence of adequate capital grants from the Scottish Government which will inevitably fall on purchasers, raising the cost of housing;

Dirleton Village Association did not feel properly qualified to answer the question;

Association of East Lothian Day Centres suggests the alternative approach would allow infrastructure to be provided without delay when required, rather than after development has taken place;

Haddington and District Amenity Society support the preferred approach where a range of contributions is considered on a cumulative basis. Clear priorities for different areas should be established;

Scottish Green Party East Lothian would like to see greater demands on developers and housing development which is not based on a speculative housing market;

Members of the public

General Comments

- The approach needs to be flexible enough to deal with specific requirements;
- Development proposal should be vetted for infrastructure impact, and assessment made of infrastructure changes required and the cost of implementation supplied by the developer;

- The cost of implementation of the improvements should be divided between the Authority that requires the development to proceed and the developer;
- Developers are not made to contribute properly to infrastructure and to address the impacts development has on a community;
- Setting a flat rate on an annual basis does not fit well with the nature of large developments, which may span many years of planning and build;
- School catchment areas should be reconsidered in the context of long term development areas as current boundaries may divide a site / community or result in unnecessary travel to more distant schools;
- Not clear how other agencies influence developer contributions;
- The influx of population will push existing leisure facilities beyond capacity and there may be unsustainable capital or revenue outlay for new build resulting in increased pressure for exiting sports and community centres;
- Contribution should reflect the investment required by public funds to meet the infrastructure and public services needed to support the development;
- Developers need to be held more responsible for making a reasonable contribution to the increased infrastructural consequences of their builds. Currently they are making a profit while others bear the costs and this needs to be addressed head on;
- ELC cannot and should not be expected to up-date infrastructure so this should be down to developers;
- The current approach does not ensure an adequate developer contribution - developers have too much power and the Council should tell them what they have to do;
- This policy area requires more clarity so that members of the public can look at alternative options with all the associated risks. Whilst major financial issues have been identified, no real solutions have been offered;
- Developer contributions ought to be sought for more than they currently are, including:
 - To cover the revenue implications of development, including maintenance of current road network (not just within a development site) and teacher salaries;
 - for design to make places more desirable as places to live, including for landscaping;
 - so the Council can employ independent planners to produce masterplans for public benefit;
 - Cycle routes for rural / coast roads (by pooling contributions from all sites);
 - For greatest public benefit, but which gives the planning authority latitude to vary the formula based on cumulative impact;
- The local community should not be required to accept large scale development for which there are known infrastructure problems without knowing how these might be solved;
- Infrastructure must be delivered before or with the development, and must not lag behind;
- Developer contributions should be maximised. If they create such a disincentive that developers are not interested in further house building then the Council should do it instead;
- There is too much wiggle room in current system, which is to the detriment of ELC and therefore, ultimately, the public;
- Current system is too open to human error and developer influence;
- Not clear how often a developer fails to honour their commitment;
- Developer contributions are merely a bribe;

Comments on the Preferred Approach

- Developer contributions must be assessed on a case by case basis as the developments are so diverse and each area has different needs;

- This approach would mean that contributions could be charged according to the need for contributions to infrastructure and facility requirements and ELC could then 'manage' development;
- Developers stand to make considerable gains as a result of the LDP so they should definitely be required to make considerable contributions towards infrastructure and other community amenities;
- Existing developer contributions are insufficient for adequate provision of new school and other facilities unless very large scale developments such as Blindwells are involved;
- If it's done on a case by case basis you can incentivise more environmentally friendly developments and penalise firms who build beige boxes;
- Consideration should also be made of the limit of four houses should be removed to ensure all developments contribute;

Comments on the Alternative Approach

- Roof tax might result in the:
 - Insufficient funding being gathered from some sites, and political shufflings could leave some sites under provided;
 - allow infrastructure to be provided without delay when required, rather than after development has taken place;
 - save time and more forward planning by the Council;
- If developers know the costs up front they are more likely to do / pay for the work;
- Probably a better alternative;

KEY MESSAGES

- **Overall, there is support for the continuation of the current approach to assessing the need for developer contributions on a case-by-case basis;**
- **It has been suggested, including by the Scottish Government, that the alternative 'roof tax / standard charge' approach may not be consistent with Circular 3/2012;**
- **A key theme is the need for early up front information and clarity to be provided through the LDP / Action Programme / Supplementary Guidance / in pre-application discussions;**
- **There may be some merit in identifying likely costs up front as if in a roof tax model, albeit that this be followed by a case by case assessment at the time each application is made;**
- **The development industry would like to understand the obligations being placed on a site before it is allocated to help inform considerations on the viability of sites;**
- **Many members of the public feel the Council should be more firm in its approach to seeking developer contributions;**
- **Local bodies wish to be consulted on and have a say in (potentially through Area Partnerships) how and for what developer contributions should be gathered and spent.**

Issue: Affordable Housing Quota	MIR question: Question 20
Total number of responses on issue	111
Support for preferred approach	57
Support for alternative approach	24
Support for neither approach	15
<p>Scottish Government, key agencies, and adjoining authorities</p> <p>No comments</p>	
<p>National interest groups</p> <p><u>Homes for Scotland</u> supports neither approach. Whilst the 25% quota of the preferred approach would have a lighter impact on the development viability than the reasonable alternative it will put a significant strain on some sites. It is therefore vital that the rate is reviewed on a case by case basis wherever an applicant presents good evidence that the overall development would be unviable if the full quota were applied. Developers should be encouraged to present this evidence during the Proposed Plan preparation period in order that lower rates can be establish in policy for any sites where it is known the 25% would threaten deliverability,</p>	
<p>Internal Council services</p> <p>No comments</p>	
<p>Landowners, developers and agents</p> <p><u>Landowner of Foreshot Terrace Dirleton</u> believe that the Reasonable Alternative requirement may make proposed development uneconomic and financially unattractive which could stifle development.</p> <p><u>Walker Group (Scotland) Ltd</u> acknowledges the 25% quota as a benchmark maximum as set out in Scottish Planning Policy (SPP).</p> <p><u>Rick Finc Associates on behalf of owner of land at Letham Mains Holdings</u> recognises the need to provide affordable housing in accordance with Scottish Planning Policy. However we would prefer a more flexible approach to its provision taken on a site by site basis recognising the viability and other costs associated with achieving development. The Reasonable Alternative approach will not operate successfully in relation to small to medium sized sites and could lead to viability issues. Whilst the Preferred Approach is acceptable justification is required in relation to such a low trigger of 5 dwellings. Further information should be subject to Scottish Planning Guidance in respect of the split between affordable housing and other tenures as well as the mechanisms for delivering and implementing the policy.</p> <p><u>Rick Finc on behalf of MJ and V Rennie Trust</u> supports neither approach as Dunbar is a highly pressurised area in terms of housing need as reflected within the Local Housing Needs Assessment 2012. Affordable housing will only be delivered on the back of mainstream private stock as Council priorities are skewed towards the areas to the west of the District. Reference is made to the HoNDA and the SESplan Technical Note (Table 4) both of which require to be updated and justified in relation to each individual cluster. Is the Dunbar Cluster to be treated in a similar fashion to the</p>	

Musselburgh or Tranent Cluster? We wish to see a more flexible approach to the provision of affordable housing taken on a site by site basis recognising the viability and other costs associated with achieving development. The current preferred spatial approach being taken by East Lothian Council in Dunbar would militate against the delivery of affordable housing. The Reasonable Alternative approach will not operate successfully in relation to small to medium sized sites and could lead to viability issues. Whilst the Preferred Approach is acceptable justification is required in relation to such a low trigger of 5 dwellings. Further information should be subject to Scottish Planning Guidance in respect of the split between affordable housing and other tenures as well as the mechanisms for delivering and implementing the policy.

Rick Finc on behalf of Hallam Land supports the Preferred Approach. The Reasonable Alternative is not justified in locations such as Prestonpans where the price of houses is already reasonable. Furthermore, this elevated level of quota is not supported by the Local Housing Strategies. It is recognised that East Lothian is an area of housing need as reflected in the Local Housing Strategy 2012. Hallam fully recognises the need to make affordable housing provision in accordance with Scottish Planning Policy, SDP and the 25% requirement. We would however request that the Council reviews its trigger for affordable housing of 5 units, as this is considered to be too low. Reference is made to the HoNDA and the SESplan Technical Note (Table 4) both of which requires to be updated and justified in relation to each individual cluster through the LDP. The current preferred spatial approach being taken by East Lothian Council would tend to encourage development at Prestonpans and the delivery of affordable housing at Dolphingstone Farm. In the case of Dolphingstone Farm it will be necessary to assess all obligations in relation to the potential community benefits that would accrue from the provision of a new cemetery/ burial ground which would be provided as part of the development. Further information on affordable housing quotas should be subject to SPG in respect of the split between affordable housing and other tenures as well as the mechanisms for delivering and implementing the policy.

Derek Scott Planning on behalf of East Lothian Developments Ltd believe the affordable housing quota should be set at no higher than 25% for new housing proposals with smaller percentages being considered acceptable where the viability of the site delivery is jeopardised and proven to be so.

Gladman Developments Ltd supports Preferred Approach as this will ensure the Local Development Plan is in accordance with Scottish Planning Policy (SPP) . This will improve the effectiveness of sites which could be jeopardised in some locations/circumstances by a higher quota. The Council could consider increasing the quota for some sites, where appropriate to overcome the shortfall. There should be an opportunity to negotiate on site where there are development viability issues.

Ashfield Land c/o Scott Hobbs Planning Ltd supports the Preferred Approach retaining the current 25% requirement with some flexibility in terms of tenure and delivery. This complies with the requirements of SESplan and Scottish Planning Policy (SPP).

Geddes Consulting on behalf of Hamilton & Kinneil Estates, The Sir John Hope Executry , Wallace Land and Gladys Dales Drylawhill Trust , Hallam Land Management T G Tait & Sons & Sirius Sport & Leisure supports the preferred approach of 25%. Delivery mechanisms for the affordable homes must be agreed with the Council. May be some instances where requirement may impact on viability of housing developments. Therefore the Council in recognition of the requirements of SPP should adopt a more flexible approach to allow a case by case review of the affordable housing quota and tenure requirements.

Persimmon Homes do not support either approach. The flat rate of 25% meets with Scottish

Planning Policy Requirements but there needs to be consideration that in some situations this will have an impact on the viability of a development. There also needs to be consideration on the type of affordable housing to be delivered and it would be useful if East Lothian Council could provide an indication of what percentages of different housing types would be required.

Cardross Asset Management Ltd support neither of the Preferred or Reasonable Alternative approach as the percentage of affordable housing may render development of particular sites uneconomic. There should be an opportunity for developers to negotiate with East Lothian Council where the 25% target would render the development unviable.

Clarendon Planning & Developments Ltd on behalf of The Executory of the Late Sir John Hope and Barratt David Wilson Homes The Council's preferred approach is supported in relation to affordable housing policy and continuation of a 25% provision of serviced land. It is considered that there is greater scope for the 'reasonable alternative' approach of 30% (or even significantly higher) affordable housing on public land as noted, subject to the Council ensuring that setting a different rate for public land does not contravene European rules on achieving best value for sale of assets. It is considered that the delivery of housing on private land would be made more difficult if a higher proportion of affordable provision is required where private landowners can, and will, not take forward sale agreements with housebuilders if their deemed return is not of a sufficient level. This is in the context of a significant housing land supply shortfall which may be worsened in this case. Conversely, public land offers the opportunity for public sector landowners to assist in the delivery of the wider housing strategy and the ever-increasing need for higher levels of affordable housing (not just social rent) as noted in the MIR in relation to the approved Housing Need and Demand Assessment.

Barton Wilmore support the preferred approach as it maintains the provision at 25%. However SPP 2014 iterates that affordable housing requirements should not be so onerous that they impact on the viability of a site and this should be reflected in the policy. SPP states: 'Consideration should also be given to the nature of the affordable housing required and the extent to which this can be met by proposals capable of development with little or no public subsidy.

APT Planning & Development Ltd on behalf of Cruden Homes (East) Ltd and Cala Management Ltd supports the preferred approach to the Affordable Housing Quota, also supporting a mechanism to deliver a range of types of affordable housing, to be agreed on a case-by-case basis with the Council.

Turley on behalf of Hargreaves UK Services Ltd and Mr R Kennedy prefer the preferred approach in relation to affordable housing quotas; a 30% affordable housing quota may have implications for viability of sites in a recovering housing market. The quota should remain at 25%.

Ryden on behalf of the Wemyss & March Estate supports the preferred approach, which is to retain the existing affordable housing quota at 25%. 25% of homes built at Longniddry South will be affordable homes. We would support an extension of developer contribution to broadband provision if appropriate.

George F White LLP on behalf of Mr M Steven and MR D Lockie reserves the right to comment further once further information on viability testing and justification of the suggested level is provided.

Colliers on behalf of Taylor Wimpey and Mactaggart and Mickel Do not support either approach. SPP calls on local development plans to "clearly set out the scale and distribution of the affordable housing requirement for their area" (Paragraph 128) "Plans should identify any expected developer

contributions towards delivery of affordable housing... the level of affordable housing required as a contribution within a market site should generally be no more than 25% of the total number of houses. In that respect the Reasonable Alternative as set out in Table 28 of the MIR is not supported. In addition, the Preferred Approach as set out cannot be supported at this stage. Scottish Government advice calls for flexibility in the delivery of affordable housing, and it should be stressed that the stated 25% is a target only and should not be viewed as a minimum. Planning Advice Note 2/2010: Affordable Housing and Housing Land Audits clearly states that the advice contained within the PAN "has to be applied constructively and with flexibility in response to financial and market conditions." (Paragraph 2) Furthermore, it is considered good practice for development plan Policies to (inter alia) "have regard to financial obligations linked to particular developments, including any expectation that developers will contribute to infrastructure and supporting development such as schools or roads. Land values vary across Scotland, and the capacity of developments to bear a range of costs will also vary." (Paragraph 17) Accordingly, our Clients will respond in full to the issue of Affordable Housing at proposed Plan stage.

Chalmers & Co This has always seemed a very odd term to reflect what in practice usually means rented accommodation, frequently provided by a Housing Association. If this is what is meant, why not say so? If it is simply a variation in housing types and tenure - why not say so? If there is a need for a change in culture so that developments are not structured solely towards maximum profit to be shared amongst the few - why not say so? It would seem that we have moved to a bursting point where the cost of housing in the county has reached critical levels but little account seems to be taken for the fact that supply has been held back for so long such that demand has outstripped it. Now we seem likely to move to a pendulum swing if there is to be a sudden influx of 10,000 new homes in ten years.

Community Councils and local interest groups

Musselburgh Parish Grouping of the Church of Scotland state that 25% seems to be in line with elsewhere and so unlikely to deter potential developers;

Association of East Lothian Day Centres would support the preferred approach but would insist on development of affordable housing being progressed at the same time as the main development and not as an afterthought. With an ageing population special housing for the elderly should also be considered as part of a development in addition to affordable housing in larger sites with access to local amenities;

Dirleton Village Association and Gullane Community Council we note that the preferred approach is to continue the existing requirement that should be a 25% affordable housing quota and the Reasonable Alternative is that there should be a 30% quota. We do not think that the difference between the two approaches would be significant in the context of possible development in the villages of Dirleton and Gullane. There is a lack of affordable housing and particular such housing for larger families in Gullane.

Cockenzie and Port Seton Community Council believes the ratio concerning the construction of affordable housing is acceptable. They would like to see affordable housing mixed with any new builds to create a positive, socially inclusive, environment and prevent creation of deprived areas.

Sustaining Dunbar, Common Weal Dunbar and Scottish Green Party East Lothian That most housing is now unaffordable is a sorry indictment of our current system. As measures to reduce land prices are outside the scope of the LDP we would at least like to see a minimum of 25% affordable housing plus support for alternative model of developments such as community land trusts, self build and co-

housing plus a range of tenure models as described in “affordable housing tenure mix”. Further explanation of what affordable housing means would be helpful.

Old Craighall Residents and Tenants Association supports the Reasonable Alternative;

Ravensheugh Tenants and Residents Association, Ormiston Tenants and Residents Association, Windsor Park Tenants and Residents Association, Wingate Tenants and Residents Association, Tranent Tenants and Residents Association, We welcome the inclusion of planning advice that aims to boost affordable housing in East Lothian as there is a housing crisis in Scotland and East Lothian. Our view is that ELC should show leadership and opt for the reasonable alternative where 30% of new housing developments are required to be affordable housing. In addition, we support the reasonable alternative where the tenure mix should be 80% social housing and 20% of other affordable housing types.

Humbie, East and West Saltoun and Bolton Community Council The preferred options is supported. However, the allocations should be flexible to meet local demand and local circumstance, and as advised by housing associations and local communities. A housing needs survey might be a useful tool to inform the needs for affordable housing.

Bolton Steading Residents Association We agree with the comments made by the Humbie, East & West Saltoun and Bolton Community Council and would add that there is a need for an urgent review of the system so that the Community which the Council serves and the Developers can be reassured that the financial contributions will be ring fenced and expanded for the purposes given. We have concerns that, given the very high infrastructure costs associated with the proposed housing developments there will be a requirement for very high contributions in the absence of adequate capital grants from the Scottish Government which will inevitably fall on purchasers, raising the cost of housing.

Dunpender Community Council support the Preferred Approach. We agree with the 25% quota but would like to see this reviewed regularly. Instead of the 25% being land handed over to Housing Associations or where houses are seen as “affordable” if they are under £100,000 – an unaffordable figure for many people – more low cost home ownership schemes should be developed, similar to those in existence at East Saltoun and Ormiston.

North Berwick Community Council support the Reasonable Alternative. The alternative approach is preferred as there is complete agreement that affordable housing is badly needed.

Dunbar Shore Harbour Neighbourhood Group We welcome the inclusion of planning advice that aims to boost affordable housing in East Lothian. That having been said, we strongly recommend that sites are carefully considered so as to ensure a positive blend of house and tenure types in any one area and accept that this might mean that a particular development has no affordable element where the development was seen to be improving the balance. The formation of ‘no work’ ghettos is to be strongly avoided.

Goose Green Tenants & Residents Association Musselburgh We welcome the inclusion of planning advice that aims to boost affordable housing in East Lothian as there is a housing crisis in Scotland and East Lothian. Our view is that ELC should show leadership and opt for the reasonable alternative where 30% of new housing developments are required to be affordable housing. In addition, we support the reasonable alternative where the tenure mix should be 80% social housing and 20% of other affordable housing types.

Members of the public

- The Preferred Approach seems to achieve a reasonable balance between the need for affordable housing and the needs of the developer to maximise profit through the sale of larger houses;
- Support the reasonable alternative ;
- The Reasonable Alternative 30% may make developments financially unviable;
- There is a great shortage of affordable housing and does not currently meet need or demand;
- Affordable seems to relate to size etc, why not build more accommodation in flatted design but bigger floor areas to suit people wanting to downsize from big gardens, high maintenance/heating and under occupancy situations;
- It should be made clear to potential buyers just where affordable housing is going to be located as this is not the case at present;
- The more affordable housing the better, setting small numbers outside the quota simply encourages the development of clusters of unaffordable elite homes;
- That higher target won't be met without a different approach to funding. The 5 or more dwelling threshold seems rather low;
- An increased quota of affordable/social housing is required;
- Would like to see more small scale developments. If the quota for affordable housing affected the viability of these small proposals maybe there should be an option to provide a contribute towards an affordable housing fund instead;
- East Lothian is a desirable location and developers unlikely to want to develop smaller or lower value affordable property therefore a requirement for higher levels of affordable homes may be more appropriate;
- Affordable housing should be a priority for East Lothian Council
- Don't know what affordable housing means. Should build smaller units of accommodation to reflect the demographic demand now and in the future. More National Housing Trust Projects that would allow renters the opportunity to buy their property within 10 years. Do not want to see any more clusters of social housing which creates undesirable enclaves;
- Affordable housing lowers the value of private housing;
- How does an affordable house differ to a mainstream house?
- Affordable housing is needed in East Lothian as local people are often out-priced and unable to afford to live in the area they were born. Need to have housing for local young families to live in the area;
- Does not want to see entire sites developed for affordable housing; The quota must be applied to all sites;
- Needs to be supplied by developers;
- The affordable housing quota should reflect the need in the area where housing is being proposed;
- The re-use of vacant buildings and sites within towns for affordable housing would be a benefit to all parties;
- At the moment the balance between expensive and affordable housing is inadequate;
- The exponential rise in private renting is evidence of the need for more affordable housing;
- The preferred approach is reasonable – any higher would mean having to fine more jobs
- Affordable housing is a key issue for many and I support the development of this. In relation to the option provided I actually support a percentage' whether it 25% or 30% which is commensurate with the needs of the community but which is balanced against the alternative dispersal option.
- Affordable housing should be spread more widely to include the rural areas;
- Support the preferred option with the proviso that the trigger of 5 or more dwellings should

more realistically be closer to 20.

- encourage as much affordable housing as possible to support communities with expensive housing like Gullane, but it must not be used to relocate people from other parts of the country;

Key Messages:

- **Homes for Scotland supports neither approach. Whilst the 25% quota of the preferred approach would have a lighter impact on the development viability than the reasonable alternative it will put a significant strain on some sites. It is therefore vital that the rate is reviewed on a case by case basis wherever an applicant presents good evidence that the overall development would be unviable if the full quota were applied;**
- **Developers overwhelmingly support the Preferred Approach but also express concern that some sites may not be viable if the full 25% affordable housing quota is applied. Many wish development viability issues to be taken into account when seeking to secure affordable housing through market housing sites, including the potential for a reduction of such provision below 25% to help ensure development can proceed if justification is provided for this on a case-by-case basis; Therefore there should be some flexibility to negotiate this with ELC in line with SPP guidance;**
- **Community Councils and Community Groups mostly support the Preferred Approach and recognise the financial implications this has on the development of sites. However some do support the Reasonable Alternative in a drive to increase affordable housing provision within East Lothian and should be flexible to meet local demand and local circumstance. Want sites to be carefully considered so as to ensure a positive blend of house and tenure types in any one area. Some support for specialist affordable housing to meet the needs of an ageing population;**
- **Members of public generally support the Preferred Approach who recognise the financial implications this has on developers. However also some support for the Reasonable Alternative. Some confusion over what exactly affordable housing means but it is widely recognised that affordable housing is required to meet the needs of communities. Need a variety of types of affordable housing and in a good variety of locations especially rural and in expensive, sought after areas. Do not want to see developments made up solely of affordable housing – need to integrate with existing communities;**
- **Some noted that a 25% quota would not fully address needs while others noted it may secure a balance between the need for affordable housing and to ensure development viability;**
- **Some felt that an increase in the land supply would help address the affordable housing issue – demand has in the past outstripped supply, resulting in higher market housing costs and an affordability issue;**
- **Although there was some support for the higher 30% quota (particularly for land in public control subject to this representing Best Value), many felt this would make sites unviable and was not supported by SPP - notably this was the case mostly among landowners and developers;**
- **Some felt the 5 dwelling ‘trigger’ for the provision of affordable housing seemed appropriate, but some felt it is was too low particularly for smaller sites and should be increased (one suggestion was to increase it to 20 units or more);**
- **Some felt that market providers should provide a wider range and choice of homes for sale to better reflect need and demand and that these and traditional affordable housing tenures should be mixed together as part of wider development sites to secure a better social mix;**
- **Some felt the role of smaller / cheaper homes for sale should be considered as contributing towards the affordable housing quota – e.g. homes of around 90m² may be considered as affordable housing;**

- **Some felt that the provision of affordable housing should in general reflect the needs of the area in which it is being delivered - a housing needs survey would be a useful tool to help inform consideration of this;**
- **Some felt the quota and tenure mix should vary and be justified on a cluster level (see comments above on Housing Market Area and Local Authority area HNDA reporting);**
- **Locational issues – some felt that affordable housing:**
 - **the compact option may concentrate its provision in the west of East Lothian**
 - **has caused undesirable enclaves in Dunbar but is also needed there;**
 - **is needed in North Berwick and Gullane (particularly for families)**
- **Some felt that there is a need to provide affordable housing at the same time as market housing;**
- **Some felt there was a need for more affordable housing in rural areas;**
- **Some felt affordable housing lowered the value of private housing and should not be provided;**
- **Some felt that people who live in affordable housing are typically socially undesirable and the affordable housing quota should be kept as low as possible.**

Issue: Affordable Housing Tenure Mix	MIR question: Question 21
Total number of responses on issue	96
Support for preferred approach	73
Support for alternative approach	4
Support for neither approach	6
<p>Scottish Government and key agencies</p> <p><u>NHS Lothian</u>: We support the commitment to ensuring adequate housing supply and the related commitments to mixed tenure and placemaking. We note the Preferred Proposal to maintain a 25% Affordable Housing requirement when need for Affordable Housing is 33%. We think the LDP should adopt the Reasonable Alternative of 30% Affordable Housing quota to help meet the articulated need. Homelessness and housing poverty (fuel poverty, spare room subsidy) remains a problem in East Lothian with clear and negative health consequences associated with housing strain. It is also imperative that housing developments are supplemented by suitable community infrastructure. It would be a concern if new developments do not include resources designed to foster a sense of local identity or community. It is important that developments such as Goshen or Blindwells do not become dormitory suburbs or residential islands with no services or infrastructure in which new residents and established residents have nothing in common. There should be meeting places and spaces to allow community capacity and networks, which are important determinants of health and wellbeing, to be developed. Any new development must take into account consequent new demands on services, notably health and social care – see comments about health and social care integration above.</p>	
<p>National Interest Organisations:</p> <p><u>Homes for Scotland</u>: Homes for Scotland supports the Preferred Option and the introduction of a more flexible policy stance on affordable housing tenures. Commends the recognition given to the need to factor-in viability, market and development finance issues when considering the affordable housing tenure mix for a site.</p>	
<p>Landowners, developers and agents</p> <p><u>Walker Group (Scotland) Ltd</u> supports Preferred Approach and supports the proposed introduction of a more flexible policy stance on affordable housing tenures. Commends the recognition given to the need to factor-in viability, market and development finance issues when considering the affordable housing tenure mix for a site.</p> <p><u>Rick Finc Associates on behalf of landowners of site 4FD and the MJ and V Rennie Trust</u> support the Preferred Approach as maintaining the 80:20 tenure mix would appear to be overly restrictive. Our client has a clear preference towards the Preferred Approach suggested by the Council. We will comment on the SPG at the appropriate stage, but generally agree that the guidance should cover matters relating to size, type, layout and form of development.</p> <p><u>Gladman Developments Ltd</u> support the Preferred Approach to affordable housing tenure mix, to support a wide range of tenure models. Considering a wide range of tenure models provides various opportunities to the developer and Council to ensure development viability and delivery of affordable and open market units. Additionally, it provides a wider range of affordable products to the market giving more choice to the local population.</p>	

Scott Hobbs on behalf of Ashfield Land supports the Preferred Approach to affordable housing tenure mix which supports some flexibility in terms of tenure and delivery.

Geddes Consulting on behalf of Wallace Land and The Sir John Hope Executry & Hamilton & Kinneil Estates & Gladys Dales Drylawhill Trust/ Hallam Land/ T G Tait & Sons/Sirius Sport & Leisure supports the Preferred Approach which should support a wider range of affordable housing tenures. Believe that small market homes (less than 90m2) are acceptable in terms of meeting affordable housing policy requirements. Believe that the affordable housing tenure requirement for a particular development should be agreed with the Council at pre-application stage in order to fully understand the economic viability and help secure an effective site.

Persimmon Homes supports the Preferred Approach and the introduction of a more flexible policy stance on affordable housing tenures.

Cardross Asset Management: It is for the Registered Social Landlord's (RSLs) to properly assess the mix of affordable housing and to be responsible for that delivery. A prescriptive mix should not be an LDP Policy.

Clarendon Planning & Development Ltd on behalf of Barratt David Wilson Homes/ Traquair Homes supports the Preferred Approach as opposed to the current strict 80/20 social rent/LCHO approach. In particular, mid-market rent models are supported which can offer opportunities for long-term investment in rented housing and commercial return whilst meeting the needs of this growing mainstream market.

Derek Scott Planning on behalf of East Lothian Developments supports the Preferred Approach which relates to the provision of a wide range of affordable housing tenure models, including social rent, shared ownership/shared equity, homes for mid market and intermediate rent, low cost housing for market sale, self build plots and any other tenures that would fall within the definition of affordable housing.

APT Planning & Development on behalf of Cruden Homes & also Cala Homes supports the Preferred Approach supporting a mechanism to deliver a range of types of affordable housing, to be agreed on a case-by-case basis with the Council.

Ryden on behalf of the Wemyss & March Estate supports the Preferred Approach to affordable housing tenure mix. There is a spectrum of need in relation to affordable homes. Recognising a wide range of affordable tenures, including mid-market rent, low cost housing and self-build plots, will ensure that as many people as possible are helped in a number of different ways to secure appropriate and affordable accommodation.

George F White LLP on behalf of Mr M Steven/D Lockie supports Preferred Approach for a wide range of affordable housing tenure models.. Our Client reserves the right to further comment once further guidance is given on how the provision will work in practice and what negotiation land owners and/ or developers will have with the Council.

Members of the public

- support for the Preferred Approach to give a wider variety of affordable units;
- Concerns the Preferred Approach would not supply a consistent type or tenure of affordable units if decided on a case by case basis;
- Affordable units should be integrated into developments to achieve a mix of housing tenure

and type and should not be compartmentalised into one areas;

- By having a mix of housing types and tenures within a new housing development a more balanced and healthier community spirit can be created;
- Affordable housing should be built in existing council estates not in a private/affordable mix;
- The reasonable alternative approach would give more certainty to the type and number of affordable units supplied
- more NHT funded projects should be promoted
- All forms of housing tenure are important and the mix is always dependent on the area they are being built in so a continual evaluation is important.
- It is for RSLs to assess the mix of affordable housing and to be responsible for the delivery of it;
- Within the housing tenure mix and indeed all housing development there should be a requirement for accessibility and barrier free construction.- e.g. wheelchair accessible, level thresholds, mid height electrical sockets, downstairs toilets etc help to maintain an ageing population at home and are advantageous for anyone with temporary or permanent mobility difficulties and for families with young children .
- It would be excellent if self build could be part of the affordable housing quota;
- 80/20 is too restrictive;
- More affordable units need to be built around Gullane and North Berwick;
- Preferred Approach appears to be more flexible would be able to adapt to changing political/economic circumstances;

Community Councils and local interest groups

Dunfermline Community Council support the preferred approach. Believes there is a need for smaller lower cost housing for single people and couples, rather than large family type houses, and we would welcome this type of housing being prioritised. There should also be land set aside for “self-build” housing.

Humbie, East and West Saltoun and Bolton Community Council support Preferred Approach as it allows the mix of housing to be tailored to the circumstances of each proposed location.

North Berwick Community Council believes there should be much greater transparency about the ways in which affordable housing can be provided by developers and rules in this area should also be made clearer as there is currently a great deal of scope for misunderstandings. North Berwick needs sheltered (‘Sunset’) housing where people could continue to live "at home" as opposed to remaining in hospital or being taken into long term care. The Abbey home could be considered for this. North Berwick desperately needs affordable housing and more transparency is needed in the different ways in which affordable housing can be provided by developers / ELC.

Dunbar Shore Harbour Neighbourhood Group welcomes the inclusion of planning advice that aims to boost affordable housing in East Lothian. That having been said, we strongly recommend that sites are carefully considered so as to ensure a positive blend of house and tenure types in any one area and accept that this might mean that a particular development has no affordable element where the development was seen to be improving the balance. The formation of ‘no work’ ghettos is to be strongly avoided.

Goose Green Tenants & Residents Association Musselburgh supports the Reasonable Alternative Approach where 30% of new housing developments are required to be affordable housing. In addition, we support the reasonable alternative where the tenure mix should be 80% social housing and 20% of other affordable housing types.

Musselburgh Parish Grouping of the Church of Scotland believes forms of affordable housing other than social rented do not retain affordable housing in the supply for the long term. There is a shortage of houses to rent in East Lothian as well

Association of East Lothian Day Centre supports the Preferred Approach which allows a wider range of tenure options and models. However houses should be retained for that purpose in the longer term.

Sustaining Dunbar would at least like to see a minimum of 25% affordable housing plus support for alternative models of development such as community land trusts, self-build and co-housing plus a range of tenure models as described in 'affordable housing tenure mix'.

Haddington and District Amenity Society (HADS) supports the affordable housing tenures mix with a greater emphasis on self build- as an alternative to private development.

Common Weal Dunbar supports the changes to the current approach outlined above to provide a wider range of tenure and type of affordable housing.

Key Messages:

- **NHS Lothian believe the LDP should adopt the Reasonable Alternative of 30% Affordable Housing quota to help meet housing need;**
- **Homes for Scotland supports the Preferred Approach and the introduction of a more flexible policy stance on affordable housing tenures;**
- **Overwhelming support for the Preferred Approach from developers/landowners**
- **Support from developers for small market homes (less than 90m2) to be acceptable in terms of meeting affordable housing policy requirements;**
- **Support from developers for mid-market rent models for provision of affordable housing which can offer long term investment opportunities ;**
- **Some developers believe that the affordable housing tenure requirement for a particular development should be agreed with the Council at pre-application stage in order to fully understand the economic viability and help secure an effective site;**
- **RSL's should be responsible for the mix and delivery of affordable housing;**
- **Some support for Preferred Approach from Community Councils as it would allow the mix of housing to be tailored to the circumstance of each location;**
- **Belief from Community Councils and community groups that more affordable sheltered housing is required to meet the needs of an ageing population;**
- **Some support for Preferred Approach from public but also support for the Reasonable Alternative ;**
- **Concern from public that some affordable types and tenures would not be maintained as affordable in the longer term;**
- **Support for a wide range of housing types & tenures to give choice;**
- **Support for some self build housing and community trusts for delivering affordable homes;**
- **Need some accessible housing for less able bodied residents;**
- **Specialist housing for the elderly should be considered;**
- **Some felt the role of smaller / cheaper homes for sale should be considered as contributing towards the affordable housing quota.**

Issue: Energy, Including Renewable Energy (responses relating National Planning Framework 3 / Cockenzie Power Station / Off-shore Renewables)	MIR question: Question 22 (See also Q12 in relation to Prestonpans cluster)
Total number of responses on issue	101
Support for preferred approach	50
Support for alternative approach	5
Support for neither approach	28 (also note 100+ objections to PREF-P1 at Cockenzie)
<p>Scottish Government, key agencies, and adjoining authorities</p> <p><u>Scottish Government</u> notes that the preferred approach closely follows National Planning Framework 3 in relation to supporting Cockenzie as a potential location to support off-shore renewables and/or port-related activity (and Torness in the longer term), and supporting grid connections for off-shore renewables. Provides background information on off-shore renewables consents in Forth and Tay region issued in October 2014 (Near Na Gaoithe, Inch Cape Offshore Ltd, Seagreen Alpha and Seagreen Bravo). Advises that Draft Sectoral Marine Plans have been produced and Final Plans are expected to be formally adopted by Scottish Ministers in early 2015.</p> <p><u>Scottish Enterprise c/o Scott Hobbs Planning</u> expresses concern at lack of reference to East Lothian’s role in energy and off-shore renewables and specifically to planning permission obtained for on-shore works in connection with off-shore renewables. These works have National Development status and failure to recognise them contravenes the Planning Act. The Local Development Plan should support such developments through appropriate policies and spatial safeguards. In Question 27, they further note that without significant investment, the electricity transmission infrastructure is not sufficient to ensure security of supply in the coming decades. The plan should contain a robust policy supporting National Development 4: High Voltage Electricity Transmission Network.</p>	
<p>National interest groups</p> <p><u>Royal Society for the Protection of Birds (RSPB) Scotland</u> seeks clarification of the status of Cockenzie Power Station and assumes the ‘Energy ‘Park’ proposals have superseded the consent for a gas-fired power station. Does not support gas-fired power station due to continued emissions. Highlights requirements of Habitats Regulations, particularly in relation to Firth of Forth and Forth Islands Special Protection Areas, and advises court rulings indicate small impacts can adversely affect site integrity. Suggests mitigation or compensation measures could include timing of operations, new roosting/nesting structures, habitat management elsewhere.</p> <p><u>National Trust for Scotland</u> has concerns over Cockenzie proposals in relation to the battlefield and John Muir Way but welcomes the Council’s restriction of the site and its calls for a masterplan. Refers to its comments on National Planning Framework 3 Main Issues Report, and to comments made on Environmental Impact Assessment scoping stage by Scottish Natural Heritage, Royal Society for the Protection of Birds, and Historic Scotland.</p>	
<p>Landowners, developers and agents</p> <p><u>Scottish Power Generation Ltd</u> notes that National Planning Framework 3 supports continued use of Cockenzie Power Station for energy generation and identifies this as a National Development. Notes</p>	

consent issued by Scottish Ministers for gas-fired generation, and for new pipeline. Requests that route of pipeline is safeguarded.

Inch Cape Offshore Limited generally supports the preferred approach but requests that the Local Development Plan includes reference to and support for off-shore renewables, and notes the requirement for electricity transmission infrastructure, reflecting the National Development status of 'High Voltage Electricity Transmission Network' within the National Planning Framework 3. The planning permission for onshore transmission works should also be referenced and safeguarded. A separate policy on on-shore infrastructure for off-shore development may be merited.

Scott Hobbs Planning on behalf of Scottish Power Energy Networks Ltd and on behalf of Neart na Gaoithe Offshore Wind Ltd expresses concern at lack of reference to East Lothian's role in energy and off-shore renewables and specifically to planning permission obtained for on-shore works in connection with off-shore renewables. These works have National Development status and failure to recognise them contravenes the Planning Act. The Local Development Plan should support such developments through appropriate policies and spatial safeguards.

Scott Hobbs Planning on behalf of Firth and Tay Offshore Wind Developers Group also considers the Local Development Plan should support on-shore works associated with off-shore wind farms through appropriate policies and spatial safeguards.

Nathaniel Lichfield & Partners on behalf of Bourne Leisure seeks acknowledgement of tourism as a sensitive receptor in terms of any proposals at Cockenzie Power Station.

Cardross Asset Management Ltd claims Cockenzie Power Station is being demolished, not retained for thermal energy; this should not be included in policy. Consideration should be given to a port but analysis of viability required. Supporting grid connections could impact on port delivery.

Community Councils and local interest groups

Cockenzie and Port Seton Community Council supports a new power station/development at Cockenzie within the power station footprint. It does not support any proposals on open spaces around the power station site.

North Berwick Community Council believes the future of Cockenzie needs to be settled.

Scottish Green Party East Lothian, Sustaining Dunbar and Common Weal Dunbar believe Cockenzie Power Station should not become gas-fired as this is inefficient and would be very polluting in terms of carbon emissions. It could become a location to support off-shore renewables but only subject to community involvement. The Council should commission research into decommissioning of Torness Power Station with a view to rehabilitating the area.

Association of East Lothian Day Centres believes the conversion to gas-fired power at Cockenzie is no longer an option and therefore the Main Issues Report is incorrect. Supports connecting off-shore renewable to existing grid but not convinced wind power is viable or reliable.

Members of the public

A number of comments were received in support of the preferred approach in relation to Cockenzie power station and National Planning Framework 3:

- Support for gas-fired power station and associated pipeline, subject to impact on infrastructure.
- Support for grid connection for off-shore renewable. This seems sensible.
- Gas power station is short-term fix; should focus on renewables.
- Support for Cockerzie Power Station being coal-fired with coal mined in Scotland.
- Support for port at Prestonpans.

A clear majority of responses expressed opposition to the preferred approach in relation to Cockerzie power station and National Planning Framework 3, for a range of reasons. These can be grouped under several broad headings, as follows:

Opposition to gas-fired power station (consented)

- Unsuitable location, too close to population, unsafe.
- If it does go ahead should be contained within existing area of power station.
- Redevelopment should focus entirely on clean forms of energy.
- How can it become gas fired when it is being demolished?
- Other areas could be developed with wind power, solar and biomass.
- The power station should be converted to biomass, tidal, wave or other feasible renewable energy generation.
- This proposal is no longer relevant.
- Relying on gas at Cockerzie would pave the way for the need for fracking.

Opposition to Cockerzie as site of industry to support off-shore renewables

- Overdevelopment, scale of proposal too large.
- Too close to residential areas – noise, pollution, road disruption, increased traffic, visual impact. Gap of only 400m between Prestonpans and Cockerzie.
- It would be working 24 hours a day, 365 days a year. There would be constant lighting and 150m high cranes.
- Total energy costs of manufacture, transport, and assembly of turbines, dredging, etc. should be compared to the energy produced.
- No evidence of job creation for locals.
- Impact on environment including Firth of Forth.
- Proposals not supported by National Planning Framework 3 (NPF3) or National Renewables Infrastructure Plan (NRIP).
- Lack of justification in Main Issues Report of need for additional employment land.
- Impact on battlefield (Battle of Prestonpans).
- Impact on open space.
- Impact on John Muir Way.
- Impact on local economy, including fishing.
- Flooding impacts due to construction of pier.
- Impact on tourism.
- Impact on agricultural land.
- Would cut communities off from each other.
- It is not a national development.
- Support cannot be expressed in the Local Development Plan as the Council has said it has no opinion on the proposal pending a planning application.
- It is not in keeping with the aims and objectives in the Main Issues Report.
- The grounds of objection are endless.

- Proposal unlikely to succeed; only a few sites across Scotland likely to succeed. Would compete with existing Fife Energy Park at Methil. Lack of country-wide coordination.

Opposition to Cockenzie as deep water port

- There is no deep water at Cockenzie. The proposal relies on incorrect assumptions about deep water access.
- Would require regular dredging. This would negate savings from renewable energy.
- Not clear how port-related activity relates to energy.
- Creation of a new quay would be damaging.

Coastal regeneration

- Should be developing tourism proposals for the coast.
- Proximity to Edinburgh, golf courses, sites of natural beauty.
- Opposition to development on the coast.

KEY MESSAGES

- **Scottish Government considers the preferred approach closely reflects National Planning Framework 3 in relation to supporting Cockenzie as a potential location to support off-shore renewables and/or port-related activity (and Torness in the longer term), and supporting grid connections for off-shore renewables. It provides further information off-shore consents - Neart Na Gaoithe, Inch Cape Offshore Ltd, Seagreen Alpha and Sea Green Bravo). Advises that sectoral marine plans expected to be adopted by Minister's in early 2015. Scottish Enterprise is concerned at lack of reference to East Lothian's role in energy and off-shore renewables and extant planning permission related on-shore works;**
- **National Trust Scotland: refers to previously expressed concerns regarding the 'Energy Park' and Battlefield. Royal Society Protection of Birds seeks clarification of status of Cockenzie Power Station gas-fired consent, and assumes 'Energy Park' supersedes this. Does not support gas-fired station, and advises that small impact can harm site integrity (SPA). Suggest mitigation and compensation measures.**
- **Cockenzie and Port Seton Community Council supports a new power station/development at Cockenzie within the power station footprint but not on open spaces around the site. North Berwick CC: future of site needs to be settled;**
- **Scottish Power Generation Ltd notes national status of gas-fired consent for Cockenzie and requests that the route of the pipeline be safeguarded too;**
- **Inch Cape Offshore Ltd requests LDP supports off-shore renewables and associated infrastructure, and national development status of 'High Voltage Electricity Transmission Network' in NPF3; Scottish Enterprise, Scottish Power Energy Networks, Neart na Gaoithe Offshore Wind Ltd, Firth of Forth and Tay Offshore Wind Developers Group request that the LDP should safeguard on-shore works associated with off-shore renewables, specifically developments which have recently secure planning permission which also have national development status;**
- **Cardross Asset Management suggests Cockenzie is not being retained for thermal energy and this should not be reflected in policy. Consideration should be given to a port here, subject to viability analysis and that grid connections could impact on port delivery;**
- **Scottish Green Party / Sustaining Dunbar / Common Weal Dunbar: Cockenzie should not become gas fired due to carbon emissions, but should support offshore renewables subject to community involvement. ELC should also commission research in to decommissioning of Torness with a view to rehabilitation;**

- **Bourne Leisure: LDP should acknowledge that tourism is a sensitive receptor in respect of any proposal at Cockenzie;**
- **Association of East Lothian Day Centres: Cockenzie's conversion to a gas-fired power station not an option and MIR is incorrect on this. Supports grid connections for offshore renewables but feels the technology may be unreliable and unviable;**
- **Some support from members of the public for preferred approach in relation to supporting Cockenzie as potential location to support off-shore renewables and/or for port related activity but significant level of concern over potential impacts of development at the Cockenzie power station site, adjacent land, or any associated port activities.**
- **Some comments go beyond scope of Local Development Plan (e.g. opposition to gas-fired power station, already consented by Government).**

Issue: Energy, Including Renewable Energy (responses other than those relating to Cockenzie Power Station or National Planning Framework 3)	MIR question: Question 22
Total number of responses on issue	See above
Support for preferred approach	See above
Support for alternative approach	See above
Support for neither approach	See above
<p>Scottish Government, key agencies, and adjoining authorities</p> <p><u>The Scottish Government</u> supports the preferred approach as it draws down the national approaches set out in NPF3 and SPP. They make the following specific comments:</p> <p>For onshore wind, they note further work could be done on the spatial framework to refine the 'community separation' zone from the current 2km, but using this buffer is acceptable in the first instance. They note that if the threshold for applying the spatial framework is set at 12m, turbines the Council would accept would be included in Group 2 areas, leading to additional processing, though they consider this acceptable. Setting the threshold at 42m would avoid this, and they consider adequate safeguards for areas where these turbines would not be desirable would be provided by development management criteria as set out in SPP.</p> <p>They state this would not leave smaller scale proposals without a locational steer as the Council can still refer to the Landscape Capacity Study separately to the Spatial Framework, as a development management consideration, and provide more clarity around the scales of proposal that the Council is likely to find easier or more difficult to accommodate, subject to individual merit considerations. They ask the Council to consider taking an approach that aligns with neighbouring authorities. A safeguard from smaller scale development may be needed for the two areas identified for where larger scale wind turbines might be acceptable (which may represent East Lothian's area of strategic capacity as set out in SPP para 162). Cumulative impacts may warrant extending this safeguard to adjacent areas.</p> <p>For heat networks, the approach is generally consistent with SPP however they note the need to comply in full with paragraphs 158 and 159 (heat mapping and support for heat networks). Consideration should be given to cross boundary links and the advantages of a consistent approach. Reference should be made to the Heat Generation Policy Statement, in particular its targets. Proposals for heat from waste should comply with the Government's Zero Waste Plan.</p> <p>Offshore Wind and Marine Renewables - they note that the approach appears to closely follow NPF 3, and give information on four relevant offshore windfarms consented in 2014. They bring the Draft Sectoral Marine Plans for Offshore Wind, Wave and Tidal Energy in Scottish Waters at http://www.scotland.gov.uk/Topics/marine/marine-consultation to the Council's attention.</p> <p><u>Scottish Environment Protection Agency</u> support the preferred approach. In particular they support the promotion of 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, as this addresses elements of the Zero Waste Plan. They note the objective from this plan advocating the waste hierarchy and harnessing opportunities to generate heat and power from waste. They encourage energy policies that encourage opportunities for the production of heat networks, district heating and sustainable</p>	

transfer of renewable energy from waste.

Office for Nuclear Regulation support neither approach. They comment that in the Spatial Framework shown, the area next to Torness Nuclear Power Station is a Group 3 area (where, subject to criteria, windfarms are likely to be acceptable), and the remainder of the Torness emergency planning zone is a Group 2 area (where there are significant constraints to windfarm development). They encourage the Council to exclude sites within the emergency planning zone from such development, if it is practical to do so. They wish to be consulted on planning applications for any windfarm within the emergency planning zone, and may advise against any such development, unless it can be shown that it is not a hazard to the Torness nuclear site.

Scottish Water does not have any preference for either approach. They require consultation on any renewable energy applications such as wind turbines or biomass facilities to ensure that there is no risk to Drinking Water Protected Areas or to the operation of their assets.

Midlothian Council wish to maintain dialogue on wind energy proposals with potential cross boundary effects. They highlight the potential of waste heat from the Millerhill Zero Waste development, to supply existing large institutional users in East Lothian (such as QMUC) or new developments, especially around Craighall. Midlothian Council supports the use of waste heat, and suggests that if the Craighall preferred sites are taken forward, a requirement to use waste heat at these locations is established.

National Interest Groups

National Trust for Scotland supports the preferred approach. They are in favour of developing renewable energy, however they support East Lothian Council's cautious approach to additional wind energy development in this area.

Royal Society for the Protection of Birds (RSPB) Scotland do not state a preference, but support the move towards a low-carbon economy and the promotion of renewable energy. They support the development of renewable energy in the right places where there are no significant effects for birds and other wildlife. The spatial framework for wind energy should include consideration of the 'full range of environmental, community, and cumulative impacts' referred to by Scottish Planning Policy. They seek an approach that maximises benefit, including natural environment enhancement and habitat creation, from wind-farm and other renewable energy developments.

Large installations should avoid areas of the coastal plain that are important for wintering geese. Domestic-scale installations may be acceptable in these areas but would require assessment. Cumulative issues may become of increasing concern in the goose-feeding areas.

Landowners, developers and agents

Viridor supports the preferred approach, welcoming the recognition to securing energy and heat from incinerating waste, and the contribution the approved Energy from Waste facility at Oxwellmains can make towards this.

Nathaniel Lichfield & Partners on behalf of Bourne Leisure support the preferred approach. Large scale renewable and low carbon energy developments have the potential to have an adverse impact upon tourism, which will in turn have a potential wider negative effect where tourism is a key driver within the local and wider economy. This should be borne in mind in any development proposals. Supplementary guidance and any future policy should include a requirement for applicants to

provide an assessment of the likely impacts of any proposals on tourism development.

Wemyss & March Estate support the preferred approach but did not elaborate.

Supporting Neither approach were:

Cardross Asset Management Ltd: District Heating, CHP have viability issues.

Winton Estate explain they have a number of renewable projects in development or under consideration, including a single turbine at Nisbet Farm, and keenly supports them. They believe that the existing Supplementary Guidance needs to be revised to reflect the updated national policy position contained in SPP, and other changed circumstances. The reasons area set out in an accompanying paper on wind energy, which also contains alternatives to the approach. They urge that the overall policy framework is generally supportive of wind power generation. It should allow flexibility, whilst protecting the amenity of residents, communities and sensitive landscapes. Flexibility is important to help ensure there is a contribution from small and medium sized wind turbines. They note SPP's highly positive emphasis on renewables as part of a sustainable development strategy. It encourages balanced assessment of development proposals against a number of criteria, with landscape and cumulative impacts always being a key consideration. They note the importance of efficiency in terms of renewable generation and wind capture. This is not reflected in existing East Lothian wind energy guidance; in its desire to secure the perfect 'landscape fit' it does not deliver a balanced approach to sustainable development nor the efficient generation of renewable energy with significant levels of wind resource left 'uncaptured'. This is counter to SPP's requirement to maximise an areas full potential for renewable power generation. They give some detailed commentary on current Council guidance with regard to wind turbine typologies.

Chalmers and Co supports the paper submitted by Winton Estate, and notes that this area has very limited coverage or ambition relative to national targets.

Community Councils and local interest groups

Supporting the preferred approach were:

Dunpender Community Council support the preferred approach and note that they would like to see legislation changed to include renewable energy sources to be fitted to all new housebuilding.

Humbie, East and West Saltoun and Bolton Community Council support the preferred approach and want a strategic approach to avoid "windfarm creep" whereby small numbers of wind turbines are added over a period to existing developments. There should be a presumption against wind development where the community payments are less than the minimum amount recommended by the Scottish Government. Land is a scarce resource and development which short-changes the local community precludes the recommended return to that community on that resource for the next 25 years.

North Berwick Community Council were the only local group supporting the Reasonable Alternative. They wish to see an approach restricting the use of large scale wind farms and protecting the coastline. Greater emphasis should be placed on investigating district heating schemes and sustainable forms of energy.

Dunbar Community Council state there are conflicting views in the community about renewable energy. The majority view is perceived to be that renewables are good in principle but not if they prove to be overly expensive to deliver or if they impact adversely on the landscape or townscape.

Solar panels/photovoltaics have caused some concern because of the visual impact on properties that are in or are immediately adjacent to the conservation area. The burning of waste at Lafarge has the backing of Dunbar's Community Council but is not supported by everybody. This remains a sensitive issue. Sections of the community remain very concerned over perceived pollution – chemical smells are driven towards the town in some winds. Viridor's plans caused great controversy and planning consent is widely unwelcome by the community. The community wishes and expects to be fully informed of Viridor's proposals for making use of generated heat/energy.

Dunbar and East Linton Area Partnership support the preferred approach and give support for the development of robust policy regarding windfarm development.

Association of East Lothian Day Centres support the preferred approach. They support offshore wind connections to the grid though express doubts about the viability and reliability of wind power. They support tighter controls for wind turbines in the rural/residential setting. They suggest the maximum height of a turbine in a rural/residential setting be restricted to a maximum of 30 metres whilst in the higher more remote areas, up to 42 metres.

KICC Project support the preferred approach favour policies to support community renewable generation schemes.

Musselburgh Parish Grouping of the Church of Scotland support the preferred approach but did not give a reason.

Old Craighall Tenants and Residents Association do not want to see the coastal area developed.

Sustaining Dunbar, the Scottish Green Party East Lothian, and Common Weal Dunbar comment that:

- District heating and small scale CHP facilities should be promoted as well as heat from genuinely renewable sources (i.e. not from landfill gas or from waste incineration).
- There must also be promotion of reduction of energy demand by treating existing buildings
- Specific policy and/ or guidance for small scale renewable proposals should be developed urgently and their development encouraged.
- Community ownership and control of renewable energy generation, storage and supply should be actively promoted and encouraged.
- Torness – The MIR recognises the significant implications of decommissioning the site. ELC should commission research into this, including redeploying employment.

Bolton Steading Residents Association find it difficult to support this approach. They support the aims but do not consider them deliverable at a cost that could be borne by typical housing developments. The technology to deliver these standards currently does not exist and could impose an unsupportable burden on developers and ultimately consumers, acting as a severe disincentive to development.

Rail Action Group, East of Scotland stated that solar panels could be installed on vacant buildings at existing station sites and at a high level in station car parks.

Sustain a Beautiful East Lothian (SABEL) state their aims are promoting and campaigning for the preservation of East Lothian's landscape; achieving balance between the development of renewable energy and rural landscape and providing a voice for planning proposals that may harm East Lothian's Landscape. They state they have 260 supporters. They would wish to see in the LDP itself:

- An updated landscape capacity assessment that takes account of cumulative impact and the impact of individual turbines that have been approved and built

- Spatial guidance, based on SPP but also taking account of cumulative impact and landscape capacity, that focuses on the precise definition and justification for areas to be afforded absolute protection from the significant effects of renewable energy proposals, recognising that there might well be very limited opportunities now for any further significant turbine development
- A criteria based renewable energy and wind energy policy, to be applied to projects outwith those protected areas, that is comprehensive (with no need to look elsewhere in the LDP), clear and sufficiently precise, with clear thresholds of acceptability and with clear guidance on how the policy will actually be operated in practice

They state that the benefits of renewable energy, which are to be balanced against adverse impact, is unclear, though they note Scottish Minister targets. They note SPP advice that net economic impact should be addressed in renewable energy proposals, and state the Council should support this and set out all economic aspects including adverse subsidy effects, costing of environmental externalities and lost equity value, that should be addressed in assessment of proposals. They note decisions in other Council areas based on criteria apparently at odds with a spatial framework, rendering it meaningless. There is a need for field work and integration of wind policy with the review of local landscapes. Precise policy wording with specific criteria with clearly defined thresholds of acceptability would help minimise inconsistent outcomes. The protocol for SNH's wording of policy responses should be made clear in particular the weight to be given to their advice when they do not object. The landscape capacity assessments and related policy guidance have led to a clear and consistent basis for dealing with smaller scale proposals. Cumulative effects are now becoming more important, with the situation becoming more complex. An independent assessment of landscape capacity directed at groups of applications would be useful. They note efforts to learn from experience how effectively visualisations show the impacts of development. Standards for supporting information should be clearly set out in policy. The Council should consider commissioning a 'before and after' study to compare actual and predicted effects of windfarms. They note the Scottish Government is carrying out such a study. Some of the consented development is considered visually intrusive and the Landscape Capacity Study height bands should be reviewed. They consider omitting areas protected on account of cumulative impact is a mistake. Energy efficiency should be included in the LDP's approach.

Members of the public

There were 31 responses in support of the preferred approach, 18 giving no further comment; four supported the reasonable alternative.

Several respondents welcomed the expansion of renewable energy generally, one noting that we have the technology but do not implement it.

District heating was mentioned supportively by 6 people, with no adverse comments.

Onshore wind had voices for and against: one respondent did not support wind (or solar) as not being viable without subsidy; another stated wind turbines are not reliable, maintenance costs are high, they are made in China, and not as green as made out; the preferred approach is the best chance of restricting them. One respondent called for rigorous enforcement of appropriate planning constraints on the use of wind turbines, especially in the lowland areas. One noted a World Wildlife Fund analysis of companies being paid not to produce wind power. Impact on tourism should be avoided. The turbine adjacent to Dirleton Castle is poorly sited. There were also supporters of wind energy, one stating they are happy to see wind turbines from their house. One respondent stated both options were too negative about wind energy, considering that apart from special sites there should be a far more relaxed approach.

Other renewable technologies specifically supported were: ground and air source heating, biomass, CHP, offshore wind and solar. The potential for solar – in arguably the sunniest part of Scotland – is also apparently ignored. There is potential for this at a range of scales; thought should be given to community schemes where appropriate. The quarry on the south side of North Berwick Law is an obvious site.

Energy from Waste: One respondent said that heat from burning waste should be explored [they did not make clear if this was where waste was already burnt or not]; another regretted that East Lothian might become a net importer of waste to feed an incinerator locals did not want and still has no heat plan. One questioned whether there was a robust plan to use waste heat from Lafarge.

Nuclear power using thorium isotopes was suggested by one respondent, who stated that management of nuclear risks has improved enormously. Nuclear was seen as more reliable, less environmentally damaging than windfarms, and requiring less maintenance and support.

On infrastructure, one respondent supported grid connection for onshore renewables.

One respondent commented that changing the rules for Historic and Listed buildings to let them become more energy efficient would help people be able to afford to live in them and use them. They stated that solar panels, wind turbines and double glazing are currently banned.

One respondent stated the report does not address the main issues, given the predicted failure to restrict global emissions and wanted a more detailed analysis of emission reduction options feasible within 10 years so an action plan could be prepared. Early action on the contribution of diesel as a fuel is an option. More facts are needed.

A move to more general energy reduction is desired.

KEY MESSAGES

Onshore Wind

- **The Scottish Government notes that further work could be done to refine (reduce) community separation distances in the Spatial Framework. A threshold of size of development to which the framework should apply of either 12 m or 42m is acceptable, with the latter avoiding Group 2 processing requirements. Safeguards would be provided by policy criteria, which could include the use of the Landscape Capacity Study;**
- **Several groups support a cautious approach to wind development, including some Community Councils and the National Trust. Other groups, including the Scottish Greens and groups in Dunbar, as well as a few landowners considered policy should be more supportive of wind development;**
- **The RSPB is supportive of renewable energy development but notes the potential for wind development to impact on birds, especially on the coastal plain;**
- **SABEL wish to see an updated landscape capacity study taking account of cumulative impact, feeding into spatial guidance, along with clear criteria based renewable energy and wind policy;**
- **There was a concern that wind energy could impact negatively on tourism;**
- **There were mixed views among the public, with points raised against wind energy being that it is not economic and not as green as made out to be;**
- **There were also supporters of wind energy;**

Heat Networks & Combines heat & Power

- There was support for the development of heat networks and CHP, including from the Scottish Government and SEPA, members of the public and several groups in Dunbar, though concerns were raised by some about its impact on viability of development;
- Midlothian Council and Viridor note the potential of the Millerhill waste plant and Oxwellmains sites respectively to supply existing and potential users of heat;
- The Scottish Government and SEPA support Energy From Waste where it complies with the Zero Waste Plan, as does Viridor;
- Dunbar Community Council state that they back this at Lafarge, but not everybody in the community supports it - Viridor's plans are widely unwelcome in the community;

Other Renewable Issues

- On micro-renewables, ground and air source heating, biomass, CHP, offshore wind were supported, with some groups calling for specific policy or guidance on small scale renewables.
- Dunder Community Council would like to see renewable energy sources fitted to all new houses;
- Solar power was supported generally, though concern was raised over solar panels where they have visual impact on properties in Conservation Areas;
- Energy efficiency was seen as important;
- There was some support for community renewable generation schemes, including from the Scottish Greens and groups in Dunbar, as well as some members of the public;

Other Energy Generation

- Nuclear power was supported by one respondent and research into its decommissioning was called for by the Scottish Greens and community groups in Dunbar.

Issue: Use of Low & Zero Carbon Generating Technologies (LZCGT) in New Buildings	MIR question: Question 23
Total number of responses on issue	74
Support for preferred approach	31
Support for alternative approach	20
Support for neither approach	9
Scottish Government, key agencies, and adjoining authorities	
<p><u>Scottish Government</u> notes that either approach is viable in a planning policy sense but advises that the specified and rising proportion of emissions to be saved must be contained within the Local Development Plan policy, not Supplementary Guidance.</p> <p><u>Scottish Environment Protection Agency</u> supports the alternative approach on the basis it would lead to greater emissions reductions but recognises the difficulty in requiring this.</p>	
National interest groups	
No Comments	
Landowners, developers and agents	
<p><u>Nathaniel Lichfield and Partners on behalf of Bourne Leisure Ltd</u> supports the preferred approach and requests the policy takes account of project feasibility and viability.</p> <p><u>Rick Finc Associates on behalf of the MJ and V Rennie Trust and on behalf of Hallam Land Management Ltd</u> claims Scottish Building Standards require mandatory reduction targets through the use of LZCGT. Believes Supplementary Guidance will be required to describe and consult on the practical implications between the two approaches.</p> <p><u>Wemyss and March Estates</u> supports the preferred approach but is concerned about the potential impact on deliverability.</p> <p><u>Cardross Asset Management Ltd</u> supports the preferred approach on the basis it is unreasonable to expect more than compliance with legal minimum standards.</p>	
Community Councils and local interest groups	
<p><u>Cockenzie and Port Seton Community Council</u> supports the alternative approach and would like to see East Lothian become a carbon neutral county, with employment opportunities created in this field.</p> <p><u>Humbie, East and West Saltoun and Bolton Community Council</u> supports the alternative approach. Energy solutions should be assessed on a whole-life cost basis. Retro-fitting is expensive so the most efficient systems should be installed.</p> <p><u>Sustaining Dunbar, Common Weal Dunbar and Scottish Green Party East Lothian</u> believe higher standards should be encouraged; this costs little and avoids 'locking in' future carbon emissions.</p>	

Haddington and District Amenity Society supports greater emphasis on energy reduction rather than offsetting. Light Emitting Diode technology and Combined Heat and Power should be promoted. In Haddington the improvements to the hospital will present a significant opportunity.

Association of East Lothian Day Centres supports preferred approach as the most realistic option.

Bolton Steading Residents Association considers the technology to deliver these standards does not exist and imposing requirements could act as a disincentive to development.

Members of the public

A majority of respondents supported the preferred approach, generally on the basis that this was a realistic and achievable option.

There was also a significant minority of respondents who expressed support for higher standards (either the alternative approach, or higher standards). Reasons given included:

- Mandatory requirements are minimal; we should aim higher.
- It is reasonable to go beyond minimum standards as technologies are improving.
- Energy efficiency in new buildings is the most important contribution the Council can make to reducing emissions, which are the greatest threat to human life in future.
- East Lothian can afford to be a leader in promoting LZCGT.
- Technologies exist today to massively reduce emissions. Should insist on maximum possible standards.

Other/misc comments received:

- A flexible approach may be desirable to allow higher standards if achievable.
- Policy does not address energy efficiency in building use. Should move towards energy reduction. 'Fabric first' should be promoted. Upgrading building fabric later is expensive.
- Developers should offer energy saving measures to prospective house owners.
- Planning application fees should be cheaper for more 'green' buildings.
- Support for solar panels.
- Should not seek to reverse climate change; it is inevitable.

KEY MESSAGES

- **Scottish Government notes either approach is viable but the specified and rising proportion of emissions to be saved must be within Local Development Plan policy, not Supplementary Guidance.**
- **A majority of respondents are in favour of preferred approach, generally believing this to be realistic and achievable, and that higher standards may be undeliverable/unviable.**
- **A significant minority of respondents support higher standards (alternative approach, or greater), generally arguing that we should aim higher and prevent future emissions.**
- **No suggestions were offered as to how the policy could be drafted and/or implemented.**

Issue: Minerals	MIR question: Question 24
Total number of responses on issue	114 (plus 2 anti-fracking petitions totalling 192 signatures)
Support for preferred approach	57
Support for alternative approach	6
Support for neither approach	24
<p>Scottish Government key agencies and adjoining authorities</p> <p><u>Scottish Government</u> : The proposed approach to onshore oil and gas is supported. Spatial policies should reflect the outcome of the Department of Energy and Climate Change’s 14th Onshore Licensing Round if any licenses for gas extraction are issued in East Lothian. Within licensed areas, the Scottish Government expect development plans to support its cautious, evidence-based approach to development, ensuring that communities have a strong voice in the process and environmental protection is paramount.</p> <p><u>Scottish Environmental Protection Agency (SEPA)</u> - supports the preferred approach - it identifies the need to develop policy to manage proposals for the extraction of shale gas or oil.</p> <p><u>Scottish Water</u> - does not have any preference for either approach. However, it is essential Scottish Water is consulted on any allocations or applications which could impact on our assets particularly Drinking Water Protected Areas.</p> <p><u>Midlothian Council</u> - would not favour the deletion of existing areas of search for sand and gravel where there are potential unworked reserves. If analysis of the potential opencast areas for coal has assessed that they would have unacceptable environmental effects, MC supports the preferred approach of not allocating an area of search for coal. Should the reasonable alternative area of search for coal (south of the A6093) be selected, Midlothian Council would seek careful attention to sensitive receptors on its side of the boundary and improvements at the junction between the A6093 and the A68 (were this to form part of the haul route).</p> <p><u>NHS Lothian</u> - Support the development of a specific shale oil policy in East Lothian.</p>	
<p>National Interest Organisations</p> <p><u>Royal Society for the Protection of Birds (RSPB)</u> – With regards opencast coal they support the preferred approach but believes that that a firmer stance on environmental issues with regard to mineral extraction and its impact on the environment should be taken. Areas of search must avoid designated wildlife sites and other sensitive habitats. Ensure high standard of restoration and aftercare with appropriate financial mechanisms and independent financial guarantees (ESCROW). Also advises taking a precautionary approach to Unconventional Gas Extraction</p> <p><u>The Coal Authority</u> – Objects to the Preferred Approach and supports the principle of the Reasonable Alternative Approach. The LDP has considered surface coal resource and potential impacts from coal extraction and has identified a possible single area of search, although in paragraph 7.51 the Council appear to conclude that an Area of Search is not viable because of all the constraints. Paragraph 7.53 is currently negatively worded and dismissive of all surface coal extraction; the Coal Authority recommends that this stance should not be adopted in the LDP but should identify areas of search where surface coal extraction is most likely to be acceptable as required by paragraph 239 of</p>	

Scottish Planning Policy. They are also keen to ensure that coal resources are not unnecessarily sterilised by new development. East Lothian area has been subjected to coal mining which will have left a legacy. Potential public safety and stability problems can be triggered and uncovered by development activities.

Landowners, developers and agents

Nick Wright and Francis Ogilvy on behalf of Winton Estate believes current local plan policy controlling sand and gravel extraction in East Lothian is too restrictive. To meet SESplan requirements there is a need for a range of sites (not just Longyester and Skateraw) to maintain a 10 year supply of aggregates and promote 2 sites on Winton Estate to the east and west of Pencaitland to allow new mineral resources to come forward.

Wemyss and March Estate do not agree with either the Preferred Approach or the Reasonable Alternative Approach. A more expansive policy which allows new mineral resources to come forward should be provided.

Rick Finc Associates on behalf of landowners, Persimmon Homes and Hallam Land are supportive of the positive approach to future minerals development contained within the Main Issues Report (MIR).

Heaton Planning Ltd on behalf of Lafarge Tarmac support Preferred Approach in relation to minerals including Aggregates and Coal. Oxwellmains Quarry and cement works has extensive remaining mineral reserves and will contribute towards the supply of limestone in the Plan Period and beyond. They note that an area of land adjacent to Oxwellmains Quarry on the east side of A1 is being promoted for use as Road Side Services (PM/DR/OTH004) . [Site was assessed but not included in the MIR] The company are exploring long-term development opportunities.

Reach Seams Gas Limited believes potential areas for Unconventional Gas Extraction include an area within East Lothian from Musselburgh to Prestonpans. This area has been the subject of historic oil, gas and mining activity and remains an area of search for potential coal and minerals extraction. Company are aware of the concerns from local communities. With the existing and proposed regulatory and industry-led reassurances in place, it is hoped that the Council, in terms of its forthcoming Proposed Plan, will be supportive of the onshore oil and gas industry.

Tantallon & Belhaven Bay Parks (Meadowhead Ltd) believes the search for minerals, aggregates and coal needs to be more proactive to develop new sources and supplies.

Community Councils and local interest groups

Dunbar and East Linton Area Partnership support the preferred approach. They raise concerns about Unconventional Gas Extraction. Support existing sites for mineral extraction around Dunbar and East Linton and that those sites are guaranteed and have a set life cycle

Fa'side Area Partnership support the preferred approach. Need for a clear policy for dealing with Unconventional Gas Extraction.

Ormiston Community Council support the preferred option where no new areas for extraction are to be identified.

Prestonpans Community Council favours the preferred approach.

Pencaitland Community Council oppose possible open cast mining in the potential area of search at the top end of Huntlaw Road

Haddington And District Amenity Society , Dunbar Shore Harbour Neighbourhood Group, Sustaining Dunbar Our Forth – Portobello, Ravensheugh Tenants and Residents Association, Ormiston Tenants and Residents Association, Windsor Park Tenants and Residents Association, Wingate Tenants and Residents Association, Tranent Tenants and Residents Association believes that East Lothian local development plan should not allow any Unconventional Gas Extraction for shale oil or gas or develop a policy to pursue these activities unless or until the community is fully and objectively informed of the implications and consulted on same.

Keith Marischal Residents Association have concerns about impact on environment of opencast mineral extraction.

Members of the public

- 37 Support preferred approach;
- 5 Support the reasonable alternative;
- 16 support neither;
- 2 petitions signed by a total of 192 names received against Fracking;

- Opencast mining: Concerns about the affect this has on local community, a blight on the landscape ;
- Areas south of A6903 is not the place for open cast coal mining;
- Not supportive of identifying new areas of search for opencast coal extraction
- any new sites that are approved need appropriate control mitigation and monitoring - need financial guarantees for the restoration of any future opencast sites (ESCROW);
- Need appropriate buffer zones between sites and local communities;
- Renewable energy must be a priority;
- Safeguards for existing quarries;
- Need to be aware of the affect mineral extraction has on tourism;
- Need clear policy on moratorium on Unconventional Gas Extraction in LDP;
- Support for a moratorium on Unconventional Gas Extraction;

Key Messages:

- **Scottish Government supports Preferred Approach to onshore oil and gas;**
- **Coal Authority supports the Reasonable Alternative which would identify areas of search where opencast most likely to be acceptable;**
- **Scottish Water does not have preference to either approach;**
- **Midlothian Council support Preferred Approach to opencast mineral extraction if such activities resulted in unacceptable environmental impacts ;**
- **RSPB believe firmer stance on environmental issues with regard to mineral extraction and its impact on the environment should be taken;**
- **Some support from Landowners/developers for a less restrictive policy on mineral extraction to allow new mineral resources to come forward;**
- **Lafarge exploring long-term development opportunities for land in their control;**
- **Public opposition to allocation of new areas of land for open cast coal and other mineral extraction due to the impact this would have on local communities;**

- **Public concern about the impact of open cast coal and mineral extraction on tourism;**
- **Public support for a robust policy on opencast coal and mineral extraction to ensure appropriate control, mitigation and monitoring which include financial guarantees for the restoration of any future opencast sites (ESCROW);**
- **Public support for the introduction of a robust policy on Unconventional Gas Extraction.**

Issue: Waste	MIR question: Question 25
Total number of responses on issue	61
Support for preferred approach	38
Support for alternative approach	5
Support for neither approach	6
<p>Scottish Government, key agencies, and adjoining authorities</p> <p><u>Scottish Environment Protection Agency</u> supports the preferred approach. Recommends a policy that seeks to minimise waste production, encourage a waste hierarchy and safeguard existing waste sites. Also recommends energy policies that encourage opportunities for the production of heat networks, district heating and the sustainable transfer of renewable energy from waste.</p> <p><u>Midlothian Council</u> promotes the inclusion of requirements for outfall points at Energy from Waste facilities to allow waste heat to be utilised by heat networks.</p>	
<p>National interest groups</p> <p>n/a</p>	
<p>Landowners, developers and agents</p> <p><u>Viridor</u> supports the preferred approach including safeguarding of Oxwellmains.</p> <p><u>Cardross Asset Management Ltd</u> considers new sites will be needed to meet Zero Waste Plan targets.</p>	
<p>Community Councils and local interest groups</p> <p><u>Cockenzie and Port Seton Community Council</u> supports the preferred approach.</p> <p><u>Dunpender Community Council</u> notes existing sites were initially unwelcome but now provide employment. More creative ideas for recycling are needed, and mixed recycling bins.</p> <p><u>Humbie, East and West Saltoun and Bolton Community Council</u> supports the preferred approach.</p> <p><u>North Berwick Community Council</u> supports the preferred approach.</p> <p><u>Haddington and District Amenity Society</u> supports the preferred approach but seeks requirements to ensure waste management has reduced impact on streets and public places.</p> <p><u>Sustaining Dunbar</u> considers the Oxwellmains Energy from Waste plant should include a heat plan displacing fossil fuel use. Waste management facilities should be localised and small-scale. Re-use, repair and ‘upcycling’ should be prioritised. Community composting should be enabled.</p> <p><u>Common Weal Dunbar</u> and <u>Scottish Green Party East Lothian</u> consider the proposed safeguards of existing and committed waste management facilities should be revised to allow permission at Oxwellmains to be reconsidered.</p>	

Bolton Steading Residents Association seeks revised waste collection arrangements

Association of East Lothian Day Centres supports the alternative approach (criteria-based policy).

Members of the public

A majority of individuals supported the preferred approach. Key points raised:

- Wish to avoid East Lothian being 'magnet' for Scotland's waste
- Support for improving/increasing recycling, developing new technologies
- Prioritising employment locations for new facilities may allow waste reduction measures in conjunction with employment opportunities
- Waste management should not impact on streets and public spaces.

KEY MESSAGES

- **General support for the preferred approach.**
- **A number of suggestions may go beyond the scope of the Local Development Plan (e.g. reviewing planning permission at Oxwellmains, recycling bins).**

Issue:	MIR question:
Minor Policy Review	Question 26
Total number of responses on issue	50
Scottish Government key agencies and adjoining authorities	
<p><u>Scottish Government</u> : In relation to local plan policy DP16 Flooding, the proposed review of the should also take into account the policy position outlined in SPP 2014 on managing flood risk and drainage .</p> <p><u>Scottish Government (Historic Scotland)</u> - welcomes the fact that the requirement for a new policy to protect battlefields is recognised.</p> <p><u>Scottish Environmental Protection Agency:</u> Policy INF5 Haddington Flood Plain requires amendment to require that in any redevelopment proposal the vulnerability of the use proposed to flood risk should be the same or lower. Policy DP16 Flooding – consider the issues of flooding and the deterioration of water environment should be dealt with in separate policies NH6 Watercourses and Wetlands – rename policy and apply to water environment as a whole to support the delivery of objectives and measures identified in the River Basin Management Plan 2; suggest reference to encouraging morphological improvements through developer requirements (e.g. removing fish barriers) to improve the water environment. Policy DP15 – Sustainable Urban Drainage Systems – support Supplementary Guidance to provide further detail on SUDS requirements Air Quality – new policy should recognise the cumulative effect of development and how it could impact on roads some several miles away from the development being considered. Waste – new policy should encourage waste minimisation/separation/reuse/recycling Energy including renewable Energy – strongly support and suggest consideration should be given to the council-location of heat facilities in creation of relevant local development plan policies Low and Zero Carbon Generating Technologies in New Buildings – supported</p>	
National Interest Organisations	
<p><u>National Trust For Scotland</u> - Would like to see enhancement of environmental and conservation policies. Development of policies for Protection of Battlefields, Countryside Around Towns, Designation of Local Geodiversity Sites; Special Landscape Areas (to replace Areas of Great Landscape Value).</p>	
Internal Consultees	
<p><u>Countryside</u> - Reviewing the policy regarding Development in the Countryside & Undeveloped Coast would be an opportunity to look at the coast as one entity. A new policy on the coast would surely be better than the complexity of developed and undeveloped, designated and undesignated, etc</p>	
Landowners, developers and agents	
<p><u>Mono consultants</u> - there should be a concise and flexible telecommunications policy;</p> <p><u>Whitehall lodges</u> - there should be a reasonable and proactive policy for tourism/ chalet developments which can work in Green Belt areas.</p>	

Bourne Leisure - the Council should introduce a policy which recognises and underpins the important role of tourism in relation to the local (and national) economy.

Whitekirk Developments Ltd - Tourism is a key driver of the East Lothian economy. It is therefore imperative that the local development plan provides all the support it can to assist existing businesses to grow and develop, and to encourage new investment in the region.

Wemyss & March Estates - Policies which enable an increase in public transport within the county should be encouraged. Policies which facilitate business and economic development including high speed broadband are essential.

Ryden on behalf of Historic Lothian Protection & Development Ltd – request a review of Policy ENV12: (East Fortune Hospital), of the adopted East Lothian Local Plan 2008 which supports the use of the site for an employment, leisure or tourism use. They are proposing a change in Policy ENV12 to support residential development on the site which would in part fund the restoration and re-use of 7 Category B listed buildings on the site.

Ryden on behalf of the Archdiocese of St Andrews and Edinburgh – requests a review of Policy ENV13 (St Joseph School) of adopted East Lothian Local Plan 2008 which supports the use of the site for an employment, leisure or tourism use. Propose a change in Policy ENV13 to support residential development on the site which would in part fund the restoration and re-use of St Josephs School which is a Category B listed building.

Community Councils and local interest groups

Prestonpans Community Council - would oppose creeping policy changes that favour destruction of Green Belt, prime arable land and historic assets.

Dunpender Community Council - Interested in future of East Fortune Hospital site, would also like review of protection of Local Shop Policy, Town and Village Centres and A1 Trunk Road facilities.

Haddington and District Amenity Society supports a review of conservation areas and Designed Landscapes and boundaries. Consideration should be given to including the boundaries of the designed landscapes within the Conservation Area.

Architectural heritage Society of Scotland -In general the existing Local Plan policies dealing with Listed Buildings and with Conservation Areas are out of date

Fisherrow Waterfont Group – need for Policy on Unconventional Gas Extraction

Scottish Green Party East Lothian – A policy on second homes in the North Berwick cluster should be considered.

Members of the public

- policy on ageing population on issues such as housing and transport for older people, people with disabilities ;
- ELC policy has completely ignored communities, for example Cockenzie energy park. Work with the communities instead of against them;
- DC1 - ELC's considering amending this important document to permit small scale development in the country, particularly of "affordable" housing;
- Resist any further development on the countryside that is not for the benefit of the countryside itself, or at least not to its detriment;

- Integration of Countryside around Towns Policy and Development in the Countryside and Undeveloped Coast Policy;
- Need policy to encourage higher density housing with communal amenity space/allotments/parks should be encouraged;
- Moratorium on Unconventional Gas Extraction;
- Need for policy on Unconventional Gas Extraction;
- Need to review Policy on flooding especially in Musselburgh;

Key Messages:

- **Scottish Government believes there should be a review of Flooding Policy which should take into account the policy position outlined in SPP 2014 on managing flood risk and drainage;**
- **SEPA wants to see amendments to policies on flooding, watercourses and wetlands and sustainable urban drainage systems and to input on new policies on air quality, waste and energy and low and zero carbon generating technologies in new buildings**
- **Historic Scotland welcomes provision for a policy to protect battlefields**
- **National Trust for Scotland would like to see enhancement of environmental and conservation policies;**
- **ELC Countryside would like a review of policies regarding development in the countryside and undeveloped coast (DC1 of the adopted East Lothian Local Plan 2008);**
- **Support from developers for a policy supporting Tourism;**
- **Support from public for specific policies supporting ageing population;**
- **Support for review of Conservation Areas and Designed Landscape Boundaries;**
- **Integrate Policy DC1 and Countryside Around Towns Policy ;**
- **Policy to encourage better energy efficiency in new buildings;**
- **Support for policy to increase density of house building;**

Issue: Other Comments	MIR question: Question 27
Total number of responses on issue	141
<p>Scottish Government and key agencies</p> <p>Scottish Government (Transport Scotland) – a multimodal transport appraisal in line with Scottish Transport Appraisal Guidance (STAG) would be required for Blindwells which might identify a need for a rail halt – but this should not be assumed from the outset. No current commitment to a ‘parkway’ station at Musselburgh and safeguarding of land for it should not be included. Any new interchange with the A1 in relation to Blindwells needs a STAG based appraisal and assessment in detail in accordance with the Design Manual for Roads and Bridges. Seek further clarity on options tested in the Transport Appraisal on Tranent bypass and its potential impact on the Slaters Road junction and on Millerhill and Queen Margaret University local road links and note the cross boundary issues with roads in Midlothian. Mitigation measures at old Craighall require to be fully examined before Proposed Plan stage.</p> <p><u>Sportscotland</u> - notes that East Lothian’s population is projected to increase by 33% to 2035; there is a need to plan for facilities including sports facilities to accommodate growth.</p>	
<p>National Interest Organisations:</p> <p>No Comments</p>	
<p>Internal Consultees</p> <p>Amenity Services advises that the Council has a diminishing stock of new burial space and has identified an immediate requirement to secure some 8.3 hectares of land to meet the need of the established population. Over and above this, the Strategy identifies that the allocation of 10,000 additional housing units in East Lothian will require a further 3 hectares of land to be secured for burial space to cover the need that volume of development will directly generate, within the minimum period that the strategy sets out to provide for. The final locations of that additional need will of course depend on the outcomes of the Main Issues Report consultation and development of the new Local Development Plan. Development of sites required to meet existing need is planned in such a way as to allow a flexible approach towards individual burial lair provision, according to the developing needs of each cluster and community</p>	
<p>Landowners, developers and agents</p> <p>No Comments</p>	
<p>Community Councils and local interest groups</p> <ul style="list-style-type: none"> • <u>East Lothian Agricultural Discussion Society</u>: there is a feeling of lack of connectivity between its different departments, and over all a lack of nurturing and support for local businesses in the region. • <u>North Berwick Community Council</u>: improving connectivity across the county involving relevant different agencies should be a high priority. Early consideration should be given to 	

tackling the problem of coastal erosion in the county. Updates on progress always welcomed both via webpage, council publications and to bodies such as area partnerships and community councils.

- Architectural Heritage Society of Scotland (AHSS): The terms Listed Building and Conservation Area are virtually absent from the MIR document

Members of the public:

- MIR difficult to understand and hard to grasp –members of the public find it inaccessible;
- Need to ensure development proposals are fully integrated into existing settlements;
- Questions around the validity of the sectors approach to the planning of East Lothian;
- Comprehensive report – seems to safeguard all that is good about the county;
- Consultation has been inadequate – there is confusion by members of the public regarding housing developments;
- The use of secondary school catchments to delineate areas within this report, rather than electoral wards, causes a number of problems;
- MIR offered no real solutions to Transportation problems outlined;
- An increase of 10 000 new homes in East Lothian would totally change its nature; this is unrealistic and undesirable;

Key Messages:

- **Sportscotland note the increase in population of East Lothian should lead to an increase in provision of sports facilities**
- **Transport Scotland requires further assessments before transport infrastructure improvements can be included in the local development plan**
- **East Lothian Council's Amenity Services advises to the need to ensure continued supply of burial space for existing and projected population**
- **Some community groups believes there should be more emphasis on joined up thinking within East Lothian Council**
- **MIR difficult for members of the public to understand – inaccessible**
- **Consultation has been inadequate.**