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Document Title	Proposed East Lothian Local Development Plan - Representations to Proposed Local Development Plan

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Additional information:

To be read in conjunction with report to Council, 28 March 2017 - Proposed Local Development Plan: Schedule 4 Representation Responses for Submission to Scottish Ministers, Appendix 3. The numbered lists correspond to the individual representations.

Authorised By	Douglas Proudfoot
Designation	Head of Development
Date	21/03/17

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Proposed East Lothian Local Development Plan Schedule 4 Representation Responses

Please refer to Appendix 3 of the report to Council on 28 March 2017: Proposed Local Development Plan: Schedule 4 Representation Responses

http://www.eastlothian.gov.uk/meetings/meeting/5908/east_lothian_council

Each Schedule 4 document lists at the beginning who made representations on that subject. Each individual representation has a reference number which corresponds to the file numbers of the original representations.

For further information or advice, please contact:

Planning Policy and Strategy, via Environment Reception at East Lothian Council,
tel: 01620 827216

Policy & Projects Development
Partnerships & Services for Communities
East Lothian Council
John Muir House
Haddington
EH41 3HA



17th October 2016

Dear Sirs

Proposed Local Development Plan

I wish to object to aspects of the proposed Local Development Plan, in so far as they affect the village in which I live, Gullane.

Over recent months I have been very concerned to watch the behaviour of Cala in their calculated approach to seeking Planning Permission for sites in the village. No real thought seems to have been given to the impact of such huge Developments on the small village, a village which is already finding it difficult to cope with the influx of, not just people but perhaps more importantly, the motor cars that people drive and seek to park while they shop.

I should like to suggest that it would be healthier for the village and for East Lothian in general if Saltcoats (NK7), Fenton Gait East (NK8) and Fenton Gait South (NK9) be removed from the proposed Local Development Plan as sites for housing development, for not only the reason given above regarding the impact that such Developments would cause to the centre of the village in terms of motor cars but also the impact that would be felt on surrounding roads as a result of the increase in traffic.

I do wonder sometimes whether those who are looking at such matters include in their reviews serious consideration of current problem issues, one of the biggest of which is the lack of a proper infrastructure in East Lothian on the basis that, so many of those now wanting to live in this area are seeking work in Edinburgh. How do they get to Edinburgh? Road, rail and bus services are completely inadequate. The parking at Drem Railway Station has long since been a joke and the move by many to park at Longniddry now results in the main road being dangerously over-parked on almost a daily basis. You surely cannot argue for further development without considering the impact that such development will have on those who already live in your area.

I have objected separately about the particular Developments at Saltcoats and Fenton Gait East .

Yours faithfully

Michael J Walker



26.10.16

I would like to strongly object to the proposed planning developments in Sullane at the following:-

Saltcoats (NK7)

Fenton Gait East (NK8)

Fenton Gait South (NK9)

and would like them to be removed from the proposed LDP as sites for housing development.

The school, the medical facilities, and general parking, will not be able to cope with the increased level of demand.

I have no objection to the fire school in Sullane being developed for housing.

yours faithfully,

I enclose copies of previous objections I have made. ✓ receipts to

Our Ref: 16/00587/PM
Ask For: Daryth Irving Tel: 01620 827373
E-mail: environment@eastlothian.gov.uk
Your Ref:
Date: 13th September 2016

Mary Scovell

Dear Sir/Madam,

PROPOSAL **Erection of 41 houses, 8 flats and associated works**
LOCATION **Fenton Gait East Gullane East Lothian**
APPLICANT **CALA Management Ltd**

Your recent written representation regarding this application was received on 13th September 2016. All matters raised in your written representation will be addressed by the Planning Authority's report on the application. No individual response can be given to points raised in your written representation.

Yours faithfully

Iain McFarlane
Service Manager - Planning
OBJAC1

Our Ref: 16/00594/PPM
Ask For: Daryth Irving Tel: 01620 827373
E-mail: environment@eastlothian.gov.uk
Your Ref:
Date: 8th September 2016



Mary Scovell

Dear Sir/Madam,

PROPOSAL	Planning permission in principle for residential development, school campus land, open space and ancillary works
LOCATION	Land At Saltcoats Field Gullane East Lothian
APPLICANT	CALA Management Ltd

Your recent written representation regarding this application was received on 2nd September 2016. All matters raised in your written representation will be addressed by the Planning Authority's report on the application. No individual response can be given to points raised in your written representation.

Yours faithfully

Iain McFarlane
Service Manager - Planning
OBJAC1

From: [Alastair Creyke](#)
To: [Local Development Plan](#)
Cc:
Subject: Objection to the Councils Proposed Local Development Plan inclusion of Greenfield sites
Date: 27 October 2016 10:30:39

Dear Sirs

Please take this email as confirmation of my objection to Saltcoats (NK7), Fenton Gait East (NK8) and Fenton Gait South (NK9) being included in the LDP and that they should be removed as sites for housing. The inclusion of all 4 proposed sites in Gullane is grossly imbalanced in terms of percentage increase in population, impact on the environment and putting pressure on inadequate infrastructure that is structurally limited.

The premise of the increase in housing at a high level is flawed following a period of historically low interest rates and variable mortgage interest rates we are now entering a more natural cycle of inflation and associated interest rate increases which will see a more natural cycle of mortgage lending with borrowers saving a deposit and purchasing houses they can afford. This return to normal lending and interest rates which naturally see a lowering of house prices as availability increases. Making projections on housing requirements and affordability in a false economic environment is flawed, and reckless unsustainable house building fuelled by such premise will scar the landscape, distort the housing market further and make inadequate infrastructure dangerous. This is an agenda controlled by politics and house builders at the expense of the electorate and future generations. You cannot simply keep building with gay abandon anywhere because there is a "housing shortage" without analysing fully the impact and understanding that the electorate will want enquiries in the future about how such reckless building was agreed and who agreed what with whom and who really benefitted.

My objections are as follows

1. The proposed number of sites is over development in the extreme and well beyond what is reasonable. A 30% increase in local population is unsustainable for schooling with 382 school age children and 107 pre school for a school with 12 places currently available. This will push medical services to beyond breaking point and as such is potentially endangering lives. This is an agenda controlled by pollitiking and house builders with no regard to sustainability of a small village or indeed their health and safety. Housing and profit comes first and public service provision comes second? Is that really the message that is being sent to the electorate?
2. You are proposing over developing a village which is key for attracting tourists based on wildlife, golf, walking, beaches. You are threatening this vital attraction by making it unattractive and dangerous. This is a village off the main road links and rail stations and you are focussing building in a village isolated from main links. This is environmentally unsound, dangerous to residents and tourists and completely illogical when sites can be focused around the A1 corridor and main train stations to the west of the county. Again this highlights a political and developers agenda. A wealthy expanding city such as Edinburgh cries out for leisure and recreation opportunities not urbanising the villages that provide this outlet from the city.
3. The cumulative impact has not been properly assessed, including the impact on the rural road network which will be the focus of the heavily increased

commuter traffic. These are roads that are used by walkers, horse riders, children, cyclists and runners and are a main attraction for the area. The proposed developments direct potentially 600 cars down roads with numerous blind corners and road widths that can only accommodate 1 car. We have already seen reports of pets being killed around West Fenton and increased unsustainable traffic flow in these areas around West Fenton linking to Drem A198 or towards Luffness Mains will lead to fatalities, this is not a fair risk for residents or tourists to satisfy an ill conceived LDP which can be adequately satisfied by placing house planning in the right areas for sustainability rather than maximising profit for house builders. Only last Sunday I was nearly hit by a white van as I ran over the blind summit of the bridge over the railway running toward West Fenton. These are real issues, accusations of NIMBYism is lazy and arrogant.

4. The Main Street in Gullane can barely accommodate 2 cars, if anything wider is coming down the road such as a van then vehicles have to respond by pulling in and as such this is not a sustainable route to encourage more and more traffic down. This is a rural village not a potential town or city overspill. Vans pass so close to the pavement my daughter has been spooked of her scooter twice after Saturday tennis and I now no longer deem it safe to scoot on the pavements. This is a road that would see huge increased traffic flows and I would add would be accessed via a blind junction from the east of the village. This is unacceptable putting the lives of children at risk in such an irresponsible manner simply to satisfy a housing requirement that can be adequately met from sites with far better infrastructure links and far less environmental impact. Building at one end of the town with facilities at the other end means 100% the Main Street is the route that will be used. These are structural limitations.

5. Allowing Greenfield sites to be developed would compromise the delivery of the Brownfield site which has widespread support, so it begs the question what is trying to be achieved by encouraging the Greenfield sites and who benefits? The developers certainly benefit. Maybe this indirectly means the Council benefits? The Canadian Geese will not benefit for which the area is famous as they fly close to and graze on the greenfield sites. The environment visually and practically certainly does not benefit impacting residents and tourists. Where do the huge sums paid for these sites go? Is Capital Gains Tax paid on the sales and recycled into the UK and local economy? Surely the council know, if not why not?

When you consider the key areas:

Environment

Infrastructure

Safety of Residents / tourists

Pressure on public services / medical facilities

None of these key areas are satisfied by these developments, none. Are there more appropriate sites with fewer issues around these key areas? Of course there are but this is an agenda driven by politicking and developer profit. Elected officials are here to protect the electorate and to act responsibly and I would implore Planners locally and nationally to remove Saltcoats, Fenton Gait East and Fenton Gait South from the LDP as sites for housing development. Sanity needs a point from which to grow and this would illustrate a point where sanity started to return to planning. It is an opportunity to stand up and be counted.

Yours faithfully
Alastair Creyke

From: [Alistair Beaton](#)
To: [Local Development Plan](#)
Subject: Local Development Plan.
Date: 27 October 2016 12:05:05

I write to express my dismay at a planning process which proposes projects and a rate of development which will destroy the ambience of a community such as Gullane. To add four sizeable housing developments simultaneously to a community whose resources, such as roads, schools and medical facilities are already under strain is quite ridiculous. Therefore I ask that Saltcoats (NK7), Fenton Gait East (NK8) and Fenton Gait South (NK9) be removed from the proposed Local Development Plan.

Alistair C Beaton,

From:
To: [Local Development Plan](#)
Subject: Feedback on proposed Local Development Plan
Date: 27 October 2016 12:22:35

Dear ELC,

I would like to provide some feedback on the proposed Local Development Plan, mostly objecting to the new housing zones around Gullane (NK7, NK8 and NK9). Before getting into that I would like to state that this is an enormous document and it is not presented in a way that is easy for people without expertise in planning matters to read and digest. I fully expect that some of the points below will not use the proper technical terminology but I hope that ELC will take them in the spirit that they are intended and not dismiss them because they are written in plain English rather than planning-speak.

There is an element of circular argument going on with the need to provide more housing. If 70% of new housing requirement is expected to come from inward migration, sensibly that in-migration will only happen if there are houses provided to entice these people to East Lothian rather than elsewhere. It therefore seems that ELC has more control over the situation than is apparent in this document. If the whole amount of housing provided is less than in this plan then there will simply be less inward migration, and it will not necessarily create a large homeless population, especially if the focus of housing development is centred on the needs of the existing population.

It seems that Gullane has been singled out for development, not because it meets any of the requirements for transport links and so on, but simply because it offers a cash-cow for ELC and developers who know that they will get premium prices for housing in the village. PROP NK6, the former Fire Training School, is an obvious choice for development and a sensible mix of housing, leisure and potentially some business opportunities will prevent a derelict eyesore in the village. That is the best case for it, as really all of the arguments still apply in relation to: poor transport links; lack of local employment opportunities; pressure on health and education facilities etc. So, this is still a weak site to develop from the ELC perspective, but development is desirable to ensure it does not become a blot on the landscape. It is a definite compromise and should be viewed in those terms. The GOOD campaign have presented this development as desirable, but that is overstating the views of most people in Gullane.

The other three developments (PROP NK7, PROP NK8 and PROP NK9) have absolutely no redeeming features about them. The reasons why these proposed developments should be removed from the LDP are:

- Most of the people who would migrate in to Gullane if new housing were made available will work in Edinburgh. The train service is already beyond capacity for commuters, the bus service is simply not good enough to support regular commuting, and the road network around Gullane is not great for commuters – they are country roads and are not designed for regular high speed travel.
- There would appear to be no plans to improve public transport links that would improve these options as a means of commuting to Edinburgh, so it has to be assumed all of the extra travel will take place by road. All of this traffic would have a knock-on effect on Aberlady and Longniddry before it reaches the A1, as well as the impact on Gullane. The Newcraighall roundabout would also become an even bigger bottleneck than it already is.
- Specifically, the location of two of these developments (NK8 and NK9) would push a volume of traffic onto the West Fenton road which is entirely unsuitable, and would

make it too dangerous for many of the current users who are horse-riders, cyclists, joggers and dog walkers.

- The health centre in Gullane is at capacity and does not have the resources to accept a significant increase in the local population.
- The school in Gullane is at capacity and does not have the resources to accept a significant increase in the local population.
- Other local facilities, such as the village hall, are well used and cannot accommodate a significant increase in the local population.
- The fields that are proposed for development are agricultural land, which the LDP appears to wish to preserve as it is an important resource for the county. It makes no sense to build on these fields.
- On the subject of affordable housing, because of the poor transport links in Gullane, it is a relatively expensive place to live. You need to have a car, there is not enough retail in the village to support all of the requirements of daily living, and the available options are more expensive than e.g. discount supermarkets available in other areas. I understand the need for affordable housing, but Gullane seems a poor choice for location given its relative isolation and the inflated cost of living that we experience because of this.

There has already been a large volume of objections to the proposed housing developments around Gullane and hopefully the arguments presented will be taken note of and that for the next draft of the LDP proposals for development at NK7, NK8 and NK9 will be removed. They will destroy the attractive character of the village, they will have an impact on tourism, and they will not be great options to live in due to the poor transport links and lack of facilities in the village.

Regards

Lynne Simpson

From: [Mary McCreath](#)
To: [Local Development Plan](#)
Subject: ldp Gullane
Date: 27 October 2016 15:26:14

I object to the inclusion of Saltcoats (NK 7) NK 8 & NK 9 for residential development in this plan.

1. These sites are unsustainable with poor access to employment & services impacting adversely on tourism & recreation in this renowned golfing area.

2. There would be gross over development with 3 major sites at the East end of the village and a huge increase in the population of 30%.

3. Development of all 4 sites is too great & cannot be absorbed in the village. These sites would contribute 50% of all new sites in the North Berwick coastal area.

4. The LPD shows no improvements to infrastructure in Gullane and therefore there will be an adverse impact on the rural road network including the C111 to West Fenton. The traffic increase will result in noise and pollution which will grow further as a consequence of natural growth. Some of the pavements are too narrow and others do not exist.

5. Access to trains is inadequate at Saltcoats with very limited parking at the stations.

The combined effect of increased population on this scale will adversely impact on the Conservation status of Gullane spoiling the amenity and attraction of the village.

6. Development of the brownfield Fire College will be unlikely to be undertaken if the two large greenfield sites are utilised.

7. Building here on this scale in a 10 year period will adversely impact on tourism those living here to an unreasonable level.

The proposal to extend the school by two classrooms only is inadequate. Medical facilities will be stretched too far.

D. McCreath.

From:
To: [Local Development Plan](#)
Cc: [L](#)
Subject: Prop TT1
Date: 27 October 2016 16:21:58
Attachments: [Plan proposals PROP TT1.docx](#)

Dear Sir/Madam

I have attached my letter of comments to the proposed plan Windygoul South, Tranent, (PROP TT1)

Harriet Morrison
Frances Kelly

24th October 2016

Dear Sir/Madam

I am writing regarding the proposed plans for Windygoul South, Tranent, PROP TT1

I would like to put forward the following reasons for objecting to these proposals.

1. Traffic

At present the Tranent High Street and surrounding approach roads are grid locked at peak times and the potential of an extra 1000 plus cars is going to add to this problem!!!

2. Loch Health Centre

With another 2000 plus residents in these new homes how is the health centre going to cope. Already it is 3 to 4 weeks to arrange a G.P appointment!!!

3. Primary School

Is the current school with an extension going to be able to accommodate another 1000 plus extra children. That is almost an extra 150 children per class for each year!!!

4. Lastly and most important to us is the impact on our home and surrounding area. We bought our property in 2010 because of its semi-rural position for the peace and quiet and beautiful views of the countryside, now this will be taken away from us. Is this development going to decrease the value and saleability of our home?

If these plans go ahead I am hoping we can be included in mains gas, underground electricity cabling, mains drainage and an access road. The Ormiston Road is subject to frequent flooding causing disruption, despite being resurfaced and new drains last year. Furthermore will the houses have a substantial tree belt between the farm, farm houses and the research centre.

Yours faithfully

Harriet Morrison

Frances Kelly

From:
To: [Local Development Plan](#)
Subject: Objection to Proposed LDP
Date: 27 October 2016 19:57:41

Dear Sir/Madam

I would like to register my objection to the proposed LDP for land in Innerwick.

I cannot see how further housing can be approved when there are two major areas that need attention in the village.

1. The water supply currently produces periods of very low pressure without any warning or notice from the water company.
2. The electricity regularly switches off, again without any prior warning from the Energy company.

If further houses are built without these two major factors being rectified then the village would suffer even more.

Yours faithfully

Michael Smart

From: [Alastair McIntosh](#)
To: [Local Development Plan](#)
Cc: [Carol](#)
Subject: LOCAL DEVELOPMENT PLAN
Date: 28 October 2016 10:33:02

Dear Sirs,

My wife and I would like to object to the Local Development Plan with a particular emphasis on the proposed 4 sites in Gullane. We object for the following reasons:-

1. It is gross over development to propose an additional 344 houses in Gullane, an area which is already over developed.
2. We would support development of the brown field site at the former Fire Training School but to propose green field site development in a rural area with prime farmland being lost is totally unacceptable.
3. The developments are not sustainable as regards infrastructure. Local facilities such as the Primary School, the Medical Centre and Day Centre have only recently been completed and they would be totally inadequate to accommodate an increase in population which would result from the development of 344 additional houses.
4. Community facilities apart from the Medical Centre are totally inadequate to meet additional demand.
5. As far as we are aware there has been no impact assessment as regards road traffic issues. Public transport is totally inadequate to meet demand. There is no direct rail link and the nearest station, Drem, has insufficient parking facilities as have neighbouring stations..
6. Above all it would change the character of a village which is a serious tourist and golf attraction apart from being the chosen home of over 3,000 people.

We trust that you will take into account the above points and substantially revise the plan.

Yours Sincerely

Alastair and carol McIntosh

Policy and Projects
 East Lothian Council
 John Muir House
 HADDINGTON

EH41 3HA

19 October 2016

Dear Sirs

**Proposal for Development at Woodhall Road, Pencaitland (PROP TT12) –
 Representation from Owner, 1 Wester Pencaitland Farm Cottages**

Having received notification of the proposal to develop a green field site at Woodhall Road, Pencaitland (PROP TT12)

I wish to make representation to the Council.

Material Considerations

The material considerations that I wish to make representation about are as follows:

1. Noise. There will be an increase in noise due to the additional of 16 households and associated vehicles . The creation of hard vertical and horizontal surfaces will reflect road noise from the busy A6093 which currently disperses across the open field. Both these factors will create an unacceptable increase in noise which will be a nuisance to me.
2. Overlooking.
 any building over 1 storey will overlook
 . This will negatively impact on my privacy.
3. Light. The development is to the south and west of my property and will deprive my house and garden of light.
4. Conservation Area. My property is within the Pencaitland Conservation Area. Because of this I have been required to gain planning permission to fit identical replacement windows at the front of my house; and an extension built in 2012 was kept below the existing roofline. Both of these measure were necessary to preserve the front elevation of the property to meet conservation area requirements. This proposed development will entirely spoil the front elevation which has hitherto been protected, and thereby detract from the conservation area. Wester Pencaitland farm Cottages have been in this setting with open fields to front and rear for 106 years. This setting will be lost for ever should the development go ahead.
5. Affect on Nature Conservation. The field to be developed is inhabited by a covey of grey partridges which are on the RSPB 'Red List'. These rare birds will inevitable be displaced by this development.

6. Government policy. This development contravenes Scottish Government Planning Policy published in 2014 in that:
- a) It does not 'promote the care and protection of the designated and non-designated historic environment (including individual assets, related settings and the wider cultural landscape)' (para 137)
 - b) It does not 'consider the services provided by the natural environment, safeguarding land which is highly suitable for particular uses such as food production or flood management' (Para 79)
 - c) It does not 'considering the re-use or re-development of brownfield land before new development takes place on greenfield sites' (Para 40)
 - d) It does not 'protecting, enhancing and promoting access to cultural heritage, including the historic environment; (para 29)
 - e) It contravenes policy that 'Proposals for development within conservation areas and proposals outwith which will impact on its appearance, character or setting, should preserve or enhance the character and appearance of the conservation area.' (para 143)
 - f) It contravenes policy that 'Where it is necessary to use good quality land for development, the layout and design should minimise the amount of such land that is required. Development on prime agricultural land, or land of lesser quality that is locally important should not be permitted except where it is essential' (Para 80)

Conclusion

For the reasons above I request that this proposed development PROP TT12 is removed from the Proposed Local Development Plan.

Yours Faithfully

Susanna M Hamilton (Miss)

From: [Derek Carter](#)
To: [Local Development Plan](#);
Subject: DVA comments on the proposed LDP
Date: 28 October 2016 11:01:32
Attachments: [DVA Response on the LDP Final v 28 Oct 2016.docx](#)
[Site Brief Diagrammatic Layout.png](#)
[Site Brief diagrammatic section.png](#)

To
Policy and Projects
Planning and the Environment
East Lothian Council

28th October 2016

Dirleton Village Association Comments on the proposed Local Development Plan (Castlemains Farm, Dirleton housing site sections)

Please find attached the DVAs comments and proposals with respect to the Castlemains site sections of the proposed LDP. I would be grateful to receive a receipt.

As you will be aware, CALA homes have asked the DVA to consult with them over the next few weeks with a view to producing a new design which addresses the issues raised by yourselves, HES, the APRS and the DVA. Therefore it would be extremely helpful if you could send us a response to the points set out in this email as soon as possible. Alternatively, we would be very happy to attend a meeting at John Muir House to discuss the site development brief. Clearly, the ideal way forward would be for us to propose a similar if not the same site brief as ELC and HES, as we all seem to share the same objectives.

I would also draw your attention to the request for a section 75 Agreement for a playing field to be constructed next to the primary school using surplus excavations from the Castlemains Farm works.

I attach two diagrammatic sketches, one plan and one section. These illustrate our thinking concerning a site brief. Please feel free to use these illustrations in any way you choose.

Kind Regards

Derek Carter
DVA Chairman

To East Lothian Council

Planning and the Environment

Policy and Projects

28th October 2016

Consultation Response of the Dirleton Village Association to the proposed Local Development Plan (LDP)

The Dirleton Village Association (DVA) is a registered charity, whose objects are *inter alia* to encourage the preservation and where possible the improvement of the character, amenity and beauty of the village of Dirleton and its surroundings and to encourage high standards of architecture and planning in the area. We have considered the proposed LDP as approved by East Lothian Council (ELC) on 6 September both in committee and at a well-attended open meeting. A description of the relevant parts of the proposed LDP has been made accessible to all village residents via the DVA website.

We make the following comments on those aspects of the proposed LDP which will have a direct bearing on the character, amenity and beauty of the village. They refer entirely to the proposed Castlemains Farm site:

The Castlemains Farm site.

1.0 The Supplementary Planning Guidance Technical Note concerning the proposed Countryside Around Towns policy: Dirleton section

The proposed LDP states: *‘The A198 bypasses the village to the south with small fields between the bypass and the **built up urban edge** and southern aspect of the castle. This is an important feature of the open southern aspect of the village that allows views of the **built up edge** of the village and the landmark castle. Tree groups around the village help it to integrate into the countryside. Land for expansion of Dirleton is proposed at Castlemains Place, retaining a similarly sized width of field between the bypass and **the new urban edge** as there is to the south of Gylers Road.’*

This statement, together with the open space requirements in the development brief, could be misunderstood to mean that the planning authority’s design intention for a new southern edge to the Castlemains Farm site is to strengthen its ‘urbanisation’ to form a new modern housing edge closer to the bypass. This would be in direct conflict with those general aims and policies which seek to control the impact of suburbanisation on the countryside. It is also completely out of character with the historic woodland boundaries characteristic of the **heritage** parts of the village.

We are extremely concerned about this statement, and totally disagree with the planning authority’s suggestion that the built-up character of the southern village edge should be reinforced. In this guidance note too much importance is placed on the atypical, unattractive Gylers Road suburban housing edge as if this were, in some way, a desirable precedent for further urban edge treatment for this rural conservation village. The Gylers Road development not only conflicts with the historic form of the village, but it also

suburbanises the landscape setting of the settlement's southern edge, to detrimental effect. To use this post-war, pre-conservation designation control design as a justification for further inappropriate urban edge in the countryside is to simply compound and make worse the mistakes of the past and to miss the very real opportunity presented by this development to soften and improve the rural landscape setting of the southern edge to the village.

The above extract from the proposed LDP clearly identifies the positive benefits of the village's woodland edge, stating: *Tree groups around the village help it to integrate into the countryside.* Surely then, the southern boundary of the Castlemains Farm proposed housing should be integrated into the countryside with woodland in keeping with the character of the historic part of the village landscape setting, not exposed to view as more detrimental 'urban' edge?

The importance of enclosure woodland to the historic landscape structure and setting of the village is clearly set out in the Conservation Statement, and cannot be over-emphasised. This historic characteristic should be extended around the development proposals for the Castlemains Farm site.

We would ask for the Supplementary Planning Guidance Technical Note to be revised accordingly, deleting the reference to creating a new 'urban' edge, and pointing out instead that the development site offers an opportunity to improve the landscape setting of this part of the village with woodland boundary treatment in keeping with the historic enclosure pattern of the village.

2.0 Housing Sites section: Dirleton: the Castlemains Farm site proposal description

The entry for the Castlemains site in the housing proposals section does not mention, under constraints, that the views from the castle and the castle setting need to be protected. We are concerned that the need to protect the eastern setting of the castle and the views east from both the castle and its designed landscape are not explicitly referred to anywhere in the proposed LDP.

We strongly ask for these to be included.

3.0 The effect of traffic noise from the bypass on the amenity of the Castlemains Farm site is a constraint which is not recognised anywhere in the proposed LDP

We would ask that this is included under constraints in both the housing proposal section and the site development brief

4.0 The proposed number of circa 30 houses

Following CALA's proposals for the development of this site, and the DVA's related studies, set out in the document 'Dirleton Expects' which it has published, it has become apparent that the site is not capable of incorporating circa 30 houses without adverse environmental impact. The mitigations required to reduce the noise, landscape and visual impacts will all reduce the area available for housing.

Once studies of the environmental impacts are complete, then ELC will be in a sufficiently informed position to determine the maximum number of houses which the site is capable of absorbing without detrimental effect. We would anticipate that the ‘guessed estimate’ of circa 30 will need to be revised down significantly in order to ameliorate the multiple environmental impacts.

We also continue to argue, as we did in our objections to CALA’s planning application, that a 13.6% growth rate is far too high for a conservation village.

5.0 The site development brief

We would ask for the following items to be added to the site development brief:

5.1 We strongly advocate that a requirement for the developer to provide a 30 metre wide woodland belt along the southern boundary is included in the site development brief to: Integrate the development into its landscape setting; reduce the suburban edge which currently exists; enhance the landscape setting of the conservation village; protect the setting of the castle; maintain the rural character of the views from the road; improve the amenity of the front, southern-most row of houses; gain some ecological benefit; offset the carbon footprint of this Edinburgh overspill development and attenuate the noise pollution from the bypass. See the separate proposed modification for the impact of the road noise, at paragraph 5.3 below.

5.2 In order that this woodland is protected from future felling in perpetuity, we suggest that the developer should be required to transfer the ownership of the woodland to a Woodland Trust or similar entity with charitable status which could be run by the village community. The developer should also be required to appoint a woodland contractor to plant the woodland and to maintain it for 10 years under an agreed woodland plan, managed by the Trust.

5.3 It is now apparent from the CALA application’s noise assessment document that parts of the development will exceed the guidelines for noise control.

We would therefore ask for the site design brief to contain a clause protecting the quality of life and amenity of the future house-owners from the impact of noise from the bypass. It would require the houses to be a minimum distance from the road, and for amelioration measures to be included in the proposal.

5.4 Where the brief requires the development to follow the ‘grain’ of the built form of the village, we would ask for the word ‘historic’ to be added, as there are post-war parts of the existing village which do not reflect the pattern of the historic village. Building immediately after World War Two had its own extreme challenges, which no longer exist. It also pre-dates the designation of the village and surrounding land as a conservation area and the modern realisation of the need to protect the traditional character of such areas in the face of development pressures.

5.5 We welcome the requirement for the SUDS to be sensitively designed as a landscape feature. However, it is not possible to excavate a linear ditch or to lower ground levels along the northern boundary with Castlemains Place without losing the trees, as cutting the tree roots will kill them.

Instead, we ask that the development brief be revised to specify that the woodland belt proposed above is continued up the side of Station Road, and that the SUDs feature is incorporated into this area as a landscape feature such as a hollow planted and screened with wetland trees. See the attached diagram.

5.6 Removal and replacement of the existing hedge along Castlemains Place

Although we would always prefer to retain hedges, in this case we feel that a better shaped space could be achieved along Castlemains Place by removing the existing straight hedge and replacing it on a better line with garden hedges thus creating a slightly wider and better shaped open space. See the diagram attached.

6.0 Planning Gain

We would also ask for a planning requirement for the developer to provide an off-site playing field for the Primary School, as a section 75 agreement, close to the school.

At the moment, Dirleton Primary School has no safe dedicated school or community playing field. The current School Premises Regulations (*The School Premises (General Requirements and Standards) (Scotland) Regulations 1967 and amendment regulations 1973 and 1979*), require the local authority to satisfy itself that its provision complies. The current provision in Dirleton is clearly non-compliant. The children use a 'play zone' on the existing village green next to the castle, but this straddles the main road, with play equipment located on the south side and ball games played on the larger flatter area to the north. The school has to use this larger general amenity area for ball games and sports days. Visibility for drivers travelling west through this area is blocked by the tower at the north west corner of the castle garden, and this situation is therefore not ideal from the safety point of view, particularly for casual or non-supervised play and ball games.

7.0 The Site Development Brief Plan

We attach a diagrammatic plan and a section which illustrate the above points.





Cross Section Concept (not to scale and width compressed)

Bypass
verge or
arable
field

Tree belt planted on earth
mounds

Acoustic
fencing

1.5 storey housing zone

Hedging

Spine
road

Hedging

One storey housing zone

Hedging

New Green
Space by
Castle mains
Place

POLICY AND PROJECTS
 EAST LoTHIAN COUNCIL
 JOHN MuIR HOUSE
 HADDINGTON
 EH41 3 HA



27 OCTOBER 2016

Dear Sir / Madam,

Having received notification of the proposal to develop a greenfield site at Woodhall Road, Pencaitland (PROP TT12)

I wish to make representation to the Council.
 The material considerations I wish to make representation about are :-

1. There will be an increase in noise due to the additional 16 properties and associated vehicles.
 There will also be an increase in noise due to the additional pedestrian use of the public footpath.
 The unacceptable increase in noise will be a nuisance to me.

2. The development will
 will overlook any building over 1 storey

This will constitute a loss of my privacy.
 Also the properties will deprive my house and garden of light.

3. My property is within the Poncautland Conservation Area which has been in this setting of open fields for over a hundred years. This setting will be lost with the building of more properties.

For the above reasons I request that this proposed development (PROP TT 12) is removed from the Proposed Local Development Plan.

Yours faithfully,

(MRS. P. E. GRANT)

Executive Director of Environment
 East Lothian Council
 John Muir House
 Haddington
 EH41 3HA

19 October 2016



Dear Sir

Proposed East Lothian Local Development Plan 2016

We **OBJECT** to the above planning proposal for the following reasons:-

- The proposed East Lothian Development Plan recommends that Fentoun Gait East be developed with 15 houses. The development of this site would damage the landscape setting and the associated design landscape for Category A Listed Building designed by Sir Edwin Lutyens.
- Development at this location would compromise the existing strong settlement edge to Gullane.

Greywalls and its associated gardens are included in the inventory of Gardens and Designed Landscape in Scotland (1987) which accord it the value of an outstanding work of art and of outstanding architectural importance.

The Partners at Greywalls have exercised their stewardship of Greywalls very seriously over the past 40 years and have previously resisted developer led attempts to extend the village of Gullane eastwards in the early 1970's, late 1990's and again, in 2006. The outcome of these endeavours was the introduction of policy protection in the form of the adopted East Lothian Local Plan 2000 Policy GE2 at the time which stated "*Development that harms the landscape setting of Greywalls and its associated design landscape will not be permitted*".

The preamble to the policy Para 1.14 reads as follows "*The particular importance of the landscape setting of the Grade A listed Greywalls and its associated design landscape is recognised. Greywalls should remain the focus in its setting at all times and should never be distracted by the presence of new development.*"

Para 2.168/Prop NK8 in the North Berwick cluster states that the suggested development at Fentoun Gait is '*set back from the Greywalls key view corridor*' but it would clearly be in view from the Greywalls property that is supposed to be protected under the previous East Lothian Local Plan.

CC: 11

Furthermore, the proposed development at Fentoun Gait east, although south of the A198, would extend east beyond the end of Duncur Road and would therefore specifically extend the perimeter of the village of Gullane eastwards.

A further concern is that if Gullane starts to creep further east the developer of the field to the north of the A198 may feel emboldened to attempt to develop the field between the A198 and Greywalls and the Muirfield car park.

Therefore the Partners of Greywalls Hotel, who have striven to keep this important scheduled building in prime condition, and in its original setting, strongly object to the proposed East Lothian Local Development Plan 2016. It should be noted that Greywalls Hotel provides material up-market residential accommodation which assists the local economy and tourism and provides substantial employment in the immediate area partly because of the quality of the building and its setting, which the proposed Plan would diminish.

Please acknowledge this letter.

Yours faithfully

—
Johanna Hoar

Partner, Greywalls LLP

Executive Director of Environment
East Lothian Council
John Muir House
Haddington
EH41 3HA



19 October 2016

Dear Sir

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We **OBJECT** to the above planning proposal for the following reasons:-

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The preamble to the policy Para 1.14 reads as follows "*The particular importance of the landscape setting of the Grade A listed Greywalls and its associated design landscape is recognised. Greywalls should remain the focus in its setting at all times and should never be distracted by the presence of new development.*"

Para 2.168/Prop NK8 in the North Berwick cluster states that the suggested development at Fentoun Gait is '*set back from the Greywalls key view corridor*' but it would clearly be in view from the Greywalls property that is supposed to be protected under the previous East Lothian Local Plan.

Contd/

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Please acknowledge this letter.

Yours faithfully


Jack Weaver

Partner, Greywalls LLP

Executive Director of Environment
East Lothian Council
John Muir House
Haddington
EH41 3HA



19 October 2016

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- Development at this location would compromise the existing strong settlement edge to Gullane.

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The preamble to the policy Para 1.14 reads as follows "*The particular importance of the landscape setting of the Grade A listed Greywalls and its associated design landscape is recognised. Greywalls should remain the focus in its setting at all times and should never be distracted by the presence of new development.*"

Para 2.168/Prop NK8 in the North Berwick cluster states that the suggested development at Fentoun Gait is '*set back from the Greywalls key view corridor*' but it would clearly be in view from the Greywalls property that is supposed to be protected under the previous East Lothian Local Plan.

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Please acknowledge this letter.

Yours faithfully

Ros Weaver

Partner, Greywalls LLP

Executive Director of Environment
East Lothian Council
John Muir House
Haddington
EH41 3HA



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The preamble to the policy Para 1.14 reads as follows "*The particular importance of the landscape setting of the Grade A listed Greywalls and its associated design landscape is recognised. Greywalls should remain the focus in its setting at all times and should never be distracted by the presence of new development.*"

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Please acknowledge this letter.

Yours faithfully

Flora Maclay

Partner, Greywalls LLP

Executive Director of Environment
East Lothian Council
John Muir House
Haddington
EH41 3HA



19 October 2016

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The preamble to the policy Para 1.14 reads as follows "*The particular importance of the landscape setting of the Grade A listed Greywalls and its associated design landscape is recognised. Greywalls should remain the focus in its setting at all times and should never be distracted by the presence of new development.*"

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Please acknowledge this letter.

Yours faithfully

Freddy Weaver

Partner, Greywalls LLP

Response ID ANON-ZMS3-3MXX-WSubmitted to **East Lothian Proposed Local Development Plan**Submitted on **2016-10-28 14:47:24****About You****1 What is your name?****First name:**

Graeme

Surname:

Patrick

2 What is your email address?**Email address:****3 Postal Address****Address:**

Wa ker Group (Scotland) Ltd

Royston Road

Livingston

EH54 8AH

4 Please enter your postcode**Postcode:**

EH54 8AH

5 Are you responding as (or on behalf of) a.....?

Developer/ agent/ landowner

6 What is your organisation and role (if applicable)?**Organisation:**

Wa ker Group (Scotland) Ltd

Your role:

Strategic Land Director

7 Are you supporting the plan?

Yes

If Yes: Please include your reasons for support:

Wa ker Group are supportive of the allocation of Windy South, Tranent (PROP TT1)

Section 1 - Introduction (pages 1-10)**1a Introduction - what modifications do you wish to see made to the Introduction of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.****Modification(s) sought::**

None

1b Please give any information/reasons in support of each modification suggested to the Introduction of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.**Justification for Modification(s):****Section 2 - A Spatial Strategy for East Lothian (pages 11-14)****1a A Spatial Strategy for East Lothian - what modifications do you wish to see made to this section of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.**

Modifications(s) sought:

The term "mixed use" is used throughout the LDP and Main Strategy Diagram lists is separately from Housing and Employment. Clarification of what exactly is meant by "mixed use" is required in order to guide future development proposals?

1b Please give any information/reasons in support of each modification suggested to the Spatial Strategy of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

Define "mixed use".

Section 2c - Blindwells Cluster Strategy Map (pg 27)

1a Strategy Map for Blindwells Cluster - What modifications do you wish to see made to the strategy map for the Blindwells Cluster in the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:**File upload:**

No file was uploaded

1b Strategy map for Blindwells Cluster - Please give any information/reasons in support of each modification suggested to the Blindwells Strategy map in the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):**Section 2d - Tranent Cluster Strategy Map (pg 31)**

1a Strategy Map for Tranent Cluster - What modifications do you wish to see made to the strategy map for the Tranent Cluster in the Plan? Please state all relevant paragraph numbers of the proposed plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

Allocation TT1 – Windygoul South is identified as a "mixed use" site as opposed to a housing site. The term "mixed use" is used throughout the LDP and Main Strategy Diagram lists is separately from Housing and Employment. Clarification of what exactly is meant by "mixed use" is required in order to guide future development proposals? Given the zoning of Employment site TT3 to the west of TT1, it is not envisaged that TT1 will include employment use within the boundary of the allocation and the proposed school expansion site (TT2) is identified separately. The site was promoted solely for residential use and its identification as a Housing site would be appropriate.

1b Strategy Map for Tranent Cluster - Please give any information/reasons in support of each modification suggested to the strategy map for the Tranent Cluster in the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

Identify site TT1 (Windygoul South) as a Housing site rather than a mixed use site.

Section 2d - Introduction to Tranent Cluster (pg 32)

1a Introduction to Tranent Cluster - What modifications do you wish to see made to the Introduction of the Tranent Cluster? Please state all relevant paragraph numbers of the proposed plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

Para 2.82, typo line one?

Given that Tranent Town Centre will continue to be the focus for active land uses in the cluster including retail, commercial and business uses, why is site TT1 identified for "mixed use"?

The Walker Group is fully supportive of the allocation of the southern expansion of Tranent (TT1) for housing and to accommodate the expansion of Windygoul Primary School.

Para 2.84; whilst the Walker Group supports a future eastern Tranent by-pass and indeed the aspiration for a link road between the B6371 and the B6414 through sites TT1 and TT3, it should be acknowledged that provided the link is not prejudiced then site TT1 should be treated independently from TT3.

Para 2.85; The Walker Group supports the future potential for an eastern by-pass of Tranent. Whilst it is acknowledged that access arrangements should have regard to planned development such as Blindwells (BW1) it would be unreasonable to prevent consideration of an eastern by-pass arrangement on the grounds that it might prejudice the safeguarded scheme (BW2) given that there is no guarantee that it will come forward. Blindwells (BW1) is not anticipated to come forward before 2020/21. The timescale for the safeguarded area must be 10-15 yrs away.

1b Introduction to Tranent Cluster - Please give any information/reasons in support of each modification suggested to the introduction of the Tranent Cluster. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

Replace; "The opportunity for or provision of a link road between the B6371 and the B6414 must be secured through both of these sites" with;
"The opportunity for or provision of a link road between the B6371 and the B6414 must not be prejudiced through the development of either of these sites".

Delete; "Any eastern expansion of Tranent accessed via the Bankton A1(T) Interchange would undermine the Council's vision for a larger Blindwells and is not supported, and will only be considered by the Council after the prior implementation of an appropriate comprehensive solution for a larger new settlement at Blindwells. Without these pre-requisites being met, no further significant housing growth at Tranent will be considered by the Council" and replace with;
"Any eastern expansion of Tranent accessed via the Bankton A1(T) Interchange which would undermine the Council's vision for a larger Blindwells and is not supported."

Section 2d - Tranent Cluster Main Development Proposals

1a PROP TT1: Housing at Windygoul South, Tranent - What modifications do you wish to see made to Prop TT1 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

MOD: delete "higher", para 2.90, line 1.

MOD: Replace "The opportunity for, or provision of vehicular and active travel connections between the B6371 and the B6414 through this site and the adjacent site proposed for employment (PROP – TT3) must be secured. with;

"The opportunity for or provision of a link road between the B6371 and the B6414 must not be prejudiced through the development of either of these sites".

MOD: delete mixed use in PROP TT1 and replace with "housing".

MOD: before "transport network" add "road" and delete "and on air quality as appropriate"

1b Please give any information/reasons in support of each modification suggested to Prop TT1 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

COMMENT: Para 2.90; it is not clear what is meant by "an appropriate higher density". Windygoul South is a residential site located on the urban edge of the town and an appropriate density would have regard to its urban edge location.

Para 2.91; the Waker Group supports the aspiration for a link road between the B6371 and the B6414 through sites TT1 and TT3, it should be acknowledged that provided the link is not prejudiced then Windygoul South (TT1) should be treated independently from TT3.

Prop TT1: the Windygoul South site is only required to deliver housing, Prop TT2 site will include community uses including the full sized grass pitch with changing facilities as part of the expansion of Windygoul Primary School. Windygoul South should be identified as a housing site.

Whilst it is accepted that the additional trips to and from new development in the area will increase demand for capacity on the rail network, it is the case that current Govt policy supports this as being a sustainable model. It follows that additional demand on rail services will generate additional revenue for the privately run rail operator, Network Rail. Having encouraged rail use through many of the strategic planning policies which operate at a National and Local level, it is perverse that the Council would seek to secure developer contributions towards a range of as yet unspecified or committed "interventions" which are clearly the responsibility of the rail operator. The Office of Rail and Road confirms that the responsibilities of Network Rail are as follows:

Network Rail is the owner, operator and infrastructure manager of Britain's main railway network. It runs, maintains and develops the core physical infrastructure of the network and has to ensure efficient management of the assets over the short, medium and long-term. While managing the existing fabric of the network, and ensuring its safe use, its role is also to support and implement new initiatives and upgrades, overseeing investment committed to the development of the railways.

It is clearly state responsibility of Network Rail to "maintain, renew and develop the rail network. Requiring developer contributions from residential development does not meet the test set out in Circular 3/2012: Planning Obligations. This Circular details Scottish Government policy on the use of planning obligations and contains policy tests which are required to be met. Requiring contributions towards the Rail Network would fail the following tests:

- necessary to make the proposed development acceptable in planning terms
- relate to the proposed development either as a direct consequence of the development or arising from the cumulative impact of development in the area
- be reasonable in all other respects

Planning obligations should not be used to extract advantages, benefits or payments from landowners or developers which are not directly related to the proposed development.

It is suggested that developers will be required to make contributions towards improvements to the bus fleet in order to improve air quality within the district. The bus operators are a commercial entity and it is not reasonable that new housing development should contribute towards the assets of a private commercial organisation. Indeed it is clearly stated at para 1.31 that Whilst the Council subsidises bus services, in a deregulated transport system it is limited in what it can do to further assist service provision and also at para 4.15, where it states; Bus services are provided on a commercial basis by bus operators. For this reason the requirement to seek contributions towards improving the bus fleet of private commercial operators would not meet the tests of Circular 3/2012: Planning Obligations and would therefore be ultra-vires.

2a PROP TT2: Windygoul Primary School Expansion Land - What modifications do you wish to see made to Prop TT2 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

MOD: Para 2.92 after "land within the site"...add "measuring 1.124ha"
PROP TT2, after "Windygoul Primary School campus"...add "measuring 1.124ha"

2b Please give any information/reasons in support of each modification suggested to Prop TT2 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

COMMENT: The Wa ker Group are concerned that the area required for safeguarding is not specified in the proposal. The SG Developer Contributions Framework states that the additional campus at Windygoul total requirement is 1.124ha. This should be clarified in the text or PROP TT2.

3a PROP TT3: Employment at Windygoul South, Tranent - What modifications do you wish to see made to Prop TT3 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

3b Please give any information/reasons in support of each modification suggested to Prop TT3 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

4a PROP TT4: Lammermoor Terrace, Tranent - What modifications do you wish to see made to Prop TT4 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

4b Please give any information/reasons in support of each modification suggested to Prop TT4 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

5a PROP TT5: Bankpark Grove, Tranent - What modifications do you wish to see made to Prop TT5 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

5b Please give any information/reasons in support of each modification suggested to Prop TT5 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

6a PROP TT6: Kingslaw, Tranent - What modifications do you wish to see made to Prop TT6 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

6b Please give any information/reasons in support of each modification suggested to Prop TT6 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

7a PROP TT7: Macmerry North - What modifications do you wish to see made to Prop TT7 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

7b Please give any information/reasons in support of each modification suggested to Prop TT7 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

8a PROP TT8: Macmerry North - What modifications do you wish to see made to Prop TT8 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

8b Please give any information/reasons in support of each modification suggested to Prop TT8 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

9a PROP TT9: Gladsmuir East - What modifications do you wish to see made to Prop TT9 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

9b Please give any information/reasons in support of each modification suggested to Prop TT9 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

10a PROP TT10: Limeylands Road, Ormiston - What modifications do you wish to see made to Prop TT10 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

PROP TT10; delete Any new proposals for the site must include a comprehensive masterplan for the entire allocated site that that conforms to the Council's Development Brief and integrates development with the surroundings. Any development here is subject to the mitigation of any development related impacts, including on a proportionate basis for any cumulative impacts with other proposals including on the transport network, on education and community facilities, and on air quality as appropriate.

10b Please give any information/reasons in support of each modification suggested to Prop TT10 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

COMMENT: PROP TT10: Limeylands Road, Ormiston is now a committed site which has detailed planning consent, approved on appeal.

11a PROP TT11: Elphinstone West - What modifications do you wish to see made to Prop TT11 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

11b Please give any information/reasons in support of each modification suggested to Prop TT11 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

12a PROP TT12: Woodhall Road, Wester Pencaitland - What modifications do you wish to see made to Prop TT12 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

12b Please give any information/reasons in support of each modification suggested to Prop TT12 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

13a PROP TT13: Lempockwells Road, Wester Pencaitland - What modifications do you wish to see made to Prop TT13 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

13b Please give any information/reasons in support of each modification suggested to Prop TT13 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

14a PROP TT14 - What modifications do you wish to see made to Prop TT14 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

14b Please give any information/reasons in support of each modification suggested to Prop TT14 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

15a PROP TT15: Humble North - What modifications do you wish to see made to Prop TT15 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

15b Please give any information/reasons in support of each modification suggested to Prop TT15 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

16a PROP TT16: East Saltoun - What modifications do you wish to see made to Prop TT16 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

16b Please give any information/reasons in support of each modification suggested to Prop TT16 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

17a Policy TT17: Development Briefs - What modifications do you wish to see made to Policy TT17 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

17b Please give any information/reasons in support of each modification suggested to Policy TT17 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

Section 3b - Education, Community & Health and Social Care Facilities and Open Space and Play Provision (Pages 74 - 87)

1a Education - What modifications do you wish to see made to the Education section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

MOD: PROP ED4, Part B, i. add (1.24ha) after "Windygoul Primary School, Tranent"

MOD: PROP ED4, Part B replace; Developer contributions will be sought from the developers of relevant sites to fund the costs of providing this campus land, which will also be the subject of legal agreements including with the landowners of the relevant campus land. with;

Developer contributions will be required from the developers of relevant sites and East Lothian Council, where there is a current shortfall in existing facilities, to fund the costs of providing this campus land, which will also be the subject of legal agreements including with the landowners of the relevant campus land.

MOD: PROP ED4, Part C; replace The Council will provide additional phased permanent extension to pre-schools and primary schools as required to meet the need arising as a direct result of new housing development. Developer contributions will be sought from the developers of housing land to fund the costs of this permanent provision, which will be the subject of legal agreements. with;

The Council will provide additional phased permanent extension to pre-schools and primary schools as required to meet the need arising as a direct result of new housing development. Developer contributions will be required from the developers of housing land and East Lothian Council, where there is a current shortfall in existing facilities, to fund the costs of this permanent provision, which will be the subject of legal agreements.

1b Please give any information/reasons in support of each modification suggested to the Education section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

COMMENT: The policy does not reflect the requirement of the Council (ELC) to contribute towards the cost of additional pre-school and primary school campus land at Windygoul Primary School, Tranent.

COMMENT: Para 3.94 refers to the Supplementary Guidance: Developer Contributions Framework as the source for the costs for interventions, however, there remain issues of transparency related to the information in the Framework.

In respect of the use of a standard build cost of £3000persqm, this fails to take account of the differences between new build and extensions or indeed the nature of the proportion of classrooms and supplementary space (eg GP space, PE space etc). We also understand that SFT produce Low, Mean and Upper estimates of construction / project costs. The Supplementary Guidance: Developer Contributions Framework does not confirm which figure was adopted by ELC. Finally, there is no reason why ELC don't simply adopt the actual SFT figure which they quote i.e. (£2,963 at 2Q 2017). If the figure of £2,963 at 2Q 2017 is in fact the upper figure provided by SFT then there is no reason for ELC to adopt an even higher figure.

The LDP should acknowledge that use of a generic build cost cannot produce a contribution figure which will meet the test of scale and kind and that where contribution levels exceed actual build costs (based upon an open book approach), then contributions will be reimbursed.

2a Community Facilities - What modifications do you wish to see made to the Community Facilities section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

2b Please give any information/reasons in support of each modification suggested to the Community Facilities section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

3a Health and Social Care Facilities - What modifications do you wish to see made to the Health and Social Care Facilities section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

MOD: Para 3.72, line 1 delete; and new housing development. Furthermore at para 3.73 delete the final sentence Developer contributions will be sought in all relevant circumstances and commitment to fund and deliver solutions to increase capacity where necessary will be essential prior to approval of any planning permission.

MOD: Delete last sentence of 3.117 However, NHS Lothian will require new premises for GP services at Blindwells, and developer contributions will be required.

3b Please give any information/reasons in support of each modification suggested to the Health and Social Care Facilities section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

COMMENT: It is acknowledged that NHS Lothian provides primary, community-based and hospital services for the area. The NHS is fully funded, through taxation, from Central Government. Para 3.72 states, that new housing will generate demand for community and health services. This statement is disputed by the Walker Group. It is population growth which generates demand for health services. New housing only provides for the needs and demands of population growth.

Requiring developer contributions from residential development does not meet the test set out in Circular 3/2012: Planning Obligations. This Circular details Scottish Government policy on the use of planning obligations and contains policy tests which are required to be met. Requiring contributions towards Health Facilities and Services would fail the following tests:

- necessary to make the proposed development acceptable in planning terms
- relate to the proposed development either as a direct consequence of the development or arising from the cumulative impact of development in the area
- be reasonable in all other respects

Planning obligations should not be used to extract advantages, benefits or payments from landowners or developers which are not directly related to the proposed development.

The Council's Statement of Conformity with Circular 3/2012 (Tech Note 14) is simply a statement of issues which the NHS, as the Central funded provider of health services, are currently experiencing. The Statement fails to demonstrate that without the provision of these additional houses there would be no requirement for these additional services. Indeed, without the additional houses to meet the needs of the population, the pressure on the Health Service could well be significantly greater.

GP practices in the county are run by GPs as independent contractors and for this reason it would be illegal, having regard to the circular advice, to require developer contributions for the expansion of existing premises or new premises.

4a Open Space and Play Provision - What modifications do you wish to see made to the Open Space and Play Provision section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

MOD: clarification of the operation and management of allotments Policy OS6: Allotment Provision is required.

4b Please give any information/reasons in support of each modification suggested to the Open Space and Play Provision section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

COMMENT: Provided land for allotments is calculated as part of the open space requirement (60sqm/dwelling) the Walker Group will consider the accommodation of allotments within the Masterplan, subject to its location and treatment within the development not prejudicing the proper planning of the residential development. There is a lack of clear policy and approach to the integration of allotments within a residential development. Furthermore, there is little or no guidance with regards the factoring / ownership or ongoing maintenance of allotments.

Section 4 - Our Infrastructure & Resources (pages 88-117)

1a Transportation- What modifications do you wish to see made to the Transportation section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

MOD: Delete last sentence in para 4.19 which states; Provision for the interventions set out below must be made by developments that generate a need for them as set out in the Developer Contributions Framework Supplementary Guidance in accord with Policy T32 and Policy DEL1.

MOD: Delete PROP T9: Safeguarding of Land for Larger Station Car Parks + PROP T10: Safeguarding Land for Platform Lengthening

MOD: Policy T32: Transport Infrastructure Delivery Fund should be amended to clarify that rail infrastructure is excluded from the requirement to seek developer contributions.

MOD: Delete all reference to the Rail Network Improvements Contribution Zones in the LDP and Developer Contribution Framework

MOD: Delete PROP T9 and T10 from Table DEL1: Developer Contributions Framework Relevant Policies / Proposals

1b Please give any information/reasons in support of each modification suggested to the Transportation section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.**Justification for Modification(s) :**

COMMENT: Whilst it is accepted that the additional trips to and from new development in the area will increase demand for capacity on the rail network, it is the case that current Govt policy supports this as being a sustainable model. It follows that additional demand on rail services will generate additional revenue for the privately run rail operator, Network Rail. Having encouraged rail use through many of the strategic planning policies which operate at a National and Local level, it is perverse that the Council would seek to secure developer contributions towards a range of as yet unspecified or committed "interventions" which are clearly the responsibility of the rail operator. The Office of Rail and Road confirms that the responsibilities of Network Rail are as follows:

Network Rail is the owner, operator and infrastructure manager of Britain's main railway network. It runs, maintains and develops the core physical infrastructure of the network and has to ensure efficient management of the assets over the short, medium and long-term. While managing the existing fabric of the network, and ensuring its safe use, its role is also to support and implement new initiatives and upgrades, overseeing investment committed to the development of the railways.

It is clearly state responsibility of Network Rail to "maintain, renew and develop the rail network. Requiring developer contributions from residential development does not meet the test set out in Circular 3/2012: Planning Obligations. This Circular details Scottish Government policy on the use of planning obligations and contains policy tests which are required to be met. Requiring contributions towards the Rail Network would fail the following tests:

- necessary to make the proposed development acceptable in planning terms
- relate to the proposed development either as a direct consequence of the development or arising from the cumulative impact of development in the area
- be reasonable in all other respects

Planning obligations should not be used to extract advantages, benefits or payments from landowners or developers which are not directly related to the proposed development.

The Council's Statement of Conformity with Circular 3/2012 (Tech Note 14) is specifically stated to apply to Road Services Obligations, however, the Shortlisted Interventions From LDP Transport Appraisal lists PROP T9 + PROP T10: Rail Package at a cost of £4.75 million. The Statement of Conformity fails to justify the requirement for contributions towards either of these proposals in terms of the Circular policy tests.

2a Digital Communications Network - What modifications do you wish to see made to the Digital Communications Network section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.**Modifications(s) Sought:****2b Please give any information/reasons in support of each modification suggested to the Digital Communications Network of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.****Justification for Modification(s):****3a Other Infrastructure: Major Hazard Sites & Pipelines - What modifications do you wish to see made to the Other Infrastructure section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.****Modifications(s) Sought:****3b Please give any information/reasons in support of each modification suggested to the Other Infrastructure: Major Hazard Sites & Pipelines section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.****Justification for Modification(s):****4a Energy Generation, Distribution & Transmission - What modifications do you wish to see made to the Energy Generation, Distribution & Transmission section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.****Modifications(s) Sought:**

MOD: Delete policy Policy SEH2: Low and Zero Carbon Generating Technologies

4b Please give any information/reasons in support of each modification suggested to the Energy Generation, Distribution & Transmission section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

COMMENT: The use of planning policy to reduce carbon footprint is inappropriate in its application to new housebuilding. All new dwellings are required to meet standards imposed through the Building Standards. The mandatory requirement for Zero Carbon Generating Technologies does not guarantee continued maintenance of low carbon standards in the case of private housing since the ongoing performance of such technology cannot be enforced. It is therefore ineffective in the longer term.

Scottish Planning Policy recommends that such policies accord with the standards, guidance and methodologies of the building regulations however, this policy goes further than is supported by Scottish Planning policy and should be deleted.

5a Waste - What modifications do you wish to see made to The Waste section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

5b Please give any information/reasons in support of each modification suggested to the Waste section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

6a Minerals - What modifications do you wish to see made to the Minerals section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

6b Please give any information/reasons in support of each modification suggested to the Minerals section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

Section 6a - Our Natural Heritage (pages 125-132)

1a Biodiversity and Geodiversity - What modifications do you wish to see made to the Biodiversity and Geodiversity section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

1b Please give any information/reasons in support of each modification suggested to the Biodiversity and Geodiversity section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

2a Soil Quality - What modifications do you wish to see made to the Soil Quality section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

2b Please give any information/reasons in support of each modification suggested to the Soil Quality section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

3a Trees and Woodland - What modifications do you wish to see made to the Trees and Woodland section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

3b Please give any information/reasons in support of each modification suggested to the Trees and Woodland section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

4a Protecting and Enhancing the Water Environment - What modifications do you wish to see made to the Water Environment section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your

justification for this will be sought in the next question.

Modifications(s) Sought:

4b Please give any information/reasons in support of each modification suggested to the Water Environment section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

5a Sustainable Drainage Systems (SuDs) - What modifications do you wish to see made to the SuDs section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

5b Please give any information/reasons in support of each modification suggested to the Sustainable Drainage Systems (SuDS) of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

6a Flood Risk - What modifications do you wish to see made to the Flood Risk section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

5b Please give any information/reasons in support of each modification suggested to the Flood Risk section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

6a Air Quality - What modifications do you wish to see made to the Air Quality section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

MOD: Para 6.34 delete; Developers of major development sites in these areas will be expected to make appropriate and proportionate financial contributions towards these mitigation measures. This requirement will apply to allocated sites and also to any relevant windfall or other unplanned developments.

MOD: Policy NH12 – Air Quality delete “Financial contributions to strategic air quality mitigation measures will be necessary in these circumstances”.

6b Please give any information/reasons in support of each modification suggested to the Air Quality section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

COMMENT: It is suggested that developers will be required to make contributions towards improvements to the bus fleet in order to improve air quality within the district. The bus operators are a commercial entity and it is not reasonable that new housing development should contribute towards the assets of a private commercial organisation. Indeed it is clearly stated at para 1.31 that Whilst the Council subsidises bus services, in a deregulated transport system it is limited in what it can do to further assist service provision and also at para 4.15, where it states; Bus services are provided on a commercial basis by bus operators. For this reason the requirement to seek contributions towards improving the bus fleet of private commercial operators would not meet the tests of Circular 3/2012: Planning Obligations and would therefore be ultra-vires.

7a Noise - What modifications do you wish to see made to the Noise section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

7b Please give any information/reasons in support of each modification suggested to the Noise section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

Section 7 - Design (pages 137-141)

1a Design background - What modifications do you wish to see made to the Design background section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

1b Please give any information/reasons in support of each modification suggested to the Design background section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

2a Design of New Development - What modifications do you wish to see made to the Design of New Development section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

2b Please give any information/reasons in support of each modification suggested to the Design of New Development section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

3a Housing Density - What modifications do you wish to see made to the Housing Density section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

MOD: Revised the first sentence of Policy DP3 to read as follows; Policy DP3: Housing Density
All new housing sites will be expected to achieve a minimum average density of 25 dwellings per hectare (net) using a full range of housing types and sizes.

3b Please give any information/reasons in support of each modification suggested to the Housing Density section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

COMMENT: Para 7.12; It is disputed that low density equals less than 30 dwellings per hectare (dph). We consider low density to be less than 20 dph and that development which is equal to or higher than 30 dph is high density.

Para 7.13; an average density of circa 30dph is not appropriate to the character of the towns and settlements of East Lothian. It is inappropriate to require the use of flatted development in urban edge locations to meet an aspirational density standard of 30dph without regard to the surrounding areas. Development layouts should be a product of design and the market rather than minimum standards.

4a Major Development Sites - What modifications do you wish to see made to the Major Development Sites section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

4b Please give any information/reasons in support of each modification suggested to the Major Development Sites section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

5a Extension and Alterations to Existing Buildings - What modifications do you wish to see made to the Extension and Alterations to Existing Buildings of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

5b Please give any information/reasons in support of each modification suggested to the Extension and Alterations to Existing Buildings section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

6a Infill, Backland and Garden Ground Development - What modifications do you wish to see made to the Infill, Backland and Garden Ground Development section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

6b Please give any information/reasons in support of each modification suggested to the Infill, Backland and Garden Ground Development section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

7a Design Standards for New Housing Areas - What modifications do you wish to see made to the Design Standards for New Housing Areas section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

7b Please give any information/reasons in support of each modification suggested to the Design Standards for New Housing Areas section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

8a Development Briefs - What modifications do you wish to see made to the Development Briefs section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

8b Please give any information/reasons in support of each modification suggested to the Development Briefs section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

Section 8 - Delivery (pages 142 - 144)

1a Delivery - What modifications do you wish to see made to the Delivery section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

Delete PROP T9, PROP T10 and NH12 from Table DEL1: Developer Contributions Framework Relevant Policies / Proposals

1b Please give any information/reasons in support of each modification suggested to the Delivery section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

See justification provided in earlier sections.

Appendix 1 - Developer Contribution Zones (pages 145-201)

1a Appendix 1: Developer Contribution Zones; Education - What modifications do you wish to see made to Developer Contribution Zones of the proposed Plan? Please state all relevant zones to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

MOD: Revise / clarify the Developer Contributions Framework with regards the price per house applied to the land contributions for Windygoul Primary School.

1b Please give any information/reasons in support of each modification suggested to Appendix 1: Developer Contribution Zones of the proposed Plan. State all relevant zones to which the modification(s) refer.

Justification for Modification(s):

COMMENT: Technical note 14 fails to include provision for the land costs associated with the school expansion required to serve more than Windygoul South.

The Developer Contributions Framework includes a price for land at Windygoul PS of £920 per house. However Tech Note 14 does not clarify what this relates to. The Wa ker Group consider that the SG and Tech Note 14 should clarify that the £920 per house should be applied to all 670 houses as per the school works.

Proposals Map

1a Proposal Map - What modifications do you wish to see made to the LDP Proposal Map? Please state all relevant area and inset map numbers to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

MOD: amend the map to designate PROP TT1 as a housing site rather than a mixed use site.

1b Please give any information/reasons in support of each modification suggested to the LDP Proposal Map. State all relevant areas and inset map numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

Prop TT1: the Windygoul South site is only required to deliver housing, Prop TT2 site will include community uses including the full sized grass pitch with changing facilities as part of the expansion of Windygoul Primary School. Windygoul South should be identified as a housing site.

Visual Upload:

No file was uploaded

Visual Upload:

No file was uploaded

From: [Maureen Coutts](#)
To: [Local Development Plan](#)
Subject: Objections to draft Local Development Plan (LDP) - Gullane
Date: 28 October 2016 15:30:27

I object to the inclusion of the proposed housing development sites Saltcoats (NK7), Fenton Gait East (NK8) and Fenton Gait South (NK9) in the draft LDP.

My reasons for objecting are:

1. Major development at Gullane is contrary to the principle that the East Coast Strategic Development Area should follow the A1 and the East Coast main line from Musselburgh to Dunbar. Gullane is to the north of the corridor and, on the basis that the major population growth in East Lothian is driven by outflow from Edinburgh commuting back to jobs in Edinburgh, the already inadequate transport links into Edinburgh would be rendered unviable. Such development is also contrary to the stated principle that East Lothian should be developed where local service provision and sustainable transport options are good.

2. As regards local service provision, the impact on medical and school facilities which are already over-stretched would be seriously adverse. References in the draft LDP to ameliorating the primary and secondary schools provision appear inadequate both as to capacity and timing.

3. The inclusion of these sites primarily devoted to "executive" homes has all the hallmarks of the "rape" of East Lothian by Edinburgh City. There is no linkage to local jobs for local people or to in any way supporting and promoting the local economy. Gullane is a prime centre for leisure, recreation and tourism, not least because of its relatively unspoilt village centre and surroundings. Its attractiveness and consequential benefit to the local economy in the area would be seriously impaired by this proposed over development. In bigger picture terms, these sites are a significant part of further ribbon development along the coast road which is spoiling its character. Its future as an internationally recognised area in which to live, work and do business, as referred to in the Edinburgh City Region planning vision, is being increasingly jeopardised.

4. Taking into account the brownfield site at the old Fire College in Gullane, which should be a priority site for development, the addition of the 3 greenfield sites as well represents an unreasonable over development of Gullane. Its size would increase by a staggering 30% and it would be contributing 50% of the sites in the North Berwick coastal area.

5. The Edinburgh City Region planning vision refers to a healthier, more prosperous and sustainable place. The inclusion of these 3 sites runs directly counter to this vision. In particular, there will be significantly more polluting car journeys, particularly at commuter rush hours and also between the east and west ends of the village. The developers refer to "easy walking distance", but the reality is that most people use their cars to collect their shopping and fast food. Post Brexit, people are at last becoming more aware that a very heavy reliance on imported food is a dangerous policy. The Saltcoats site is prime agricultural land and should not be sacrificed to housing. This runs counter to sustainability.

6. There are already material problems with the roads infrastructure in Gullane because of increased traffic on them and unregulated parking. For example, it is generally impossible for large delivery lorries to make deliveries down the Templar Lane one way system because of poor parking. Crossing the A198 is becoming increasingly dangerous at all points, both for pedestrians and the

Muirfield Riding Therapy ponies.

7. Gullane's farming hinterland may not be a specially designated environmentally sensitive area, but it is important for a large number of wildlife. Constantly sacrificing the habitat of other animals to the unrestrained needs of human animals is particularly repugnant. Gullane's greenfield areas should not be used in this way.

8. While the draft LDP, particularly in the first major section, has considerable good material in it as to what is best for East Lothian and highlighting potential problems and adverse effects of pursuing certain policies, unfortunately what is actually proposed in relation to Gullane merely evidences the "kill by a thousand blows" principle. Small steps are taken which seem de minimis, but merely open up the way to take a next incremental step and so the original sound policy is wholly undermined.

I attach below for ease of reference a copy of my objection e-mail to the Saltcoats Field planning application which contains further material relevant to my above grounds of objection. I made similar objections to the Fenton Gait East planning application.

Maureen Coutts

Saltcoats Field planning application:

"I object to the proposed development:

1. It conflicts with East Lothian's published objective to be Scotland's leading coastal, leisure and food and drink destination.

1.1 Local and overseas tourists seek out attractive locations, which in the case of Gullane means a pretty village surrounded by open countryside. Over development will ruin this attractiveness and damage the East Lothian tourist industry. This development must also be considered in the context of the forthcoming development proposals at Fenton Gait and the Fire School in this respect.

1.2 The coastal area is marketed as Scotland's Golf Coast, but UK and foreign tourists will also cease coming because the traffic congestion will worsen. This will apply particularly to the 3 Gullane courses, as it becomes increasingly impossible to cross the A198 or to allow sufficient time to arrive at a tee on time because of ever increasing traffic volumes. The proposed development will inevitably exacerbate the problem.

1.3 Aberlady Bay is a major birdwatching attraction, but the numbers of pink-footed geese which roost there are already declining because of loss of local feeding habitats. It is noted that the developer's habitat report was done in April which avoids the geese migration season and that SNH recommended that a further report be done. Very large numbers of pink footed geese have fed after the harvest in the field on the far side of the track to West Fenton each year for many years. These will be displaced by the proposed development because of the proximity of human habitation noise and odours, dogs off leash, children playing and the like, as already happens in the proposed development site.

2. It conflicts with East Lothian's Transport Strategy objective to locate new developments to reduce the need to travel.

Apart from a small enclave of affordable housing, the proposed development is clearly aimed at the

young executive end of the market. The majority of these people are likely to work in Edinburgh, consistent with East Lothian's existing jobs profile for residents. Gullane has poor transport links, particularly given the parking difficulties at all 3 nearby stations. Environmentally undesirable road traffic will be increased by the proposed development which is in no sense located to reduce the need to travel. It would substantially be a dormitory development.

3. Consistent with the objective referred to at 1. above and the point made at 1.1 above, the existing brownfield disused Fire School site in Gullane should be developed as a matter of priority to maintain the character of the village.

3.1 The Health Centre and primary school in Gullane are already at or very near capacity, with well-publicised problems in recruiting doctors which will adversely affect the former in the next few years as doctors retire. Greenfield developments of the size of this proposed one will materially overload the existing infrastructure in many respects, including road safety and parking issues. Given the age profile of the expansion in East Lothian referred to in the East Lothian Plan, the North Berwick secondary school is also likely to be at capacity in the near future. To the extent that housing need should be alleviated, the Fire School site should be the one which squeezes resources.

3.2 East Lothian's objective is, effectively, to create local housing for local jobs. Appropriate development of the Fire School site is more likely to meet this objective than greenfield developments of the type proposed in this application.

4. East Lothian also has an objective which is, effectively, to create a safe society.

4.1 Gullane is currently a small enough village that there is a reasonably high level of familiarity among its inhabitants and a sense of community. This in turn helps to reduce crime and anti-social behaviour levels. Over-development is known to destroy these benefits.

4.2 At a wider level, a society is not safe where it is heavily dependant on imported foodstuffs as ours is and to give up productive agricultural land to housing evidences the worst sort of "short-termism".

5. Shopping traffic and parking is already a material issue in the east end of Gullane. The proposed development would materially increase the problem.

There is no clear economic benefit to be derived from the proposed development and there is clear economic, environmental and social detriment as outlined above."

From:
To: [Local Development Plan](#)
Subject: Re Mains Farm development, North Berwick (PROP NK1)
Date: 28 October 2016 19:59:29

Dear Sir/Madam,
I live at _____) North Berwick. It is not easy to ascertain exactly what is
planned West of my property _____ - however my main concern
would be that the significant hedging and mature trees are retained.
Since we moved in in May 2016 we have regularly heard an owl and I have seen bats in the area
which should also be taken into consideration.
Regards
Dr Andrew Dexter

From:
To: [Local Development Plan](#)
Subject: proposl of houses
Date: 29 October 2016 12:40:24

As residents of Innerwick we are dismayed to hear about the proposal of houses at Kirkbrae East .We feel there is no more room due to previous hoses built at temple mains stading .

We feel our village wont be able to cope as already we have difficulties with the sewage works and drains .

Has anything been done to check that our school will be able to manage any more families moving in to the area . already having trouble with cars turning in and out of Kirkbrae we foresee accidents happening wherever they try to put access for new houses .

This is why we protest about the proposal

Yours sincerely

Morag and Roy Ellis

From: [Chris Davidson](#)
To: [Local Development Plan](#)
Subject: Objection Ref 16/00062/LDP Windygoul Soth, Tranent (Prop TT1)
Date: 29 October 2016 18:05:23
Importance: High

Regarding the proposed development plan for Windygoul South, Tranent (Prop TT1). I object to this proposed development for the following reasons:

- 1) The development will spoil the view from our house (South and the East. There will also undoubtedly be disruption during construction and more noise in the surrounding area once the development is completed. One of the reasons we purchased this property was due to the uninterrupted views and quiet location. This will also negatively affect the value of our property. If this development goes ahead will we be compensated for this?
- 2) The simple extensions to Windygoul Primary school will likely be insufficient to accommodate the extra demand put on the school. The school has already had to be extended twice due to it being undersized for its intended purpose. Even if a new extension to the school did give enough capacity I feel the number of pupils would be too great and hamper the learning experience for the children. There are also difficulties at drop off and pickup times due to inadequate road infrastructure. How would this be addressed to accommodate the extra capacity? A new school would be required.
- 3) The infrastructure of Tranent cannot cope with the proposed extra number of dwellings. There seems to be no plans for extra provision in services such as healthcare and leisure. Also the road infrastructure is currently insufficient and this also does not seem to have been considered. The main street in Tranent has long queues at busy times and this extra burden will make things even worse.
- 4) In my opinion Tranent should be considered at capacity and no further development should take place. Extra dwellings should be allocated to the proposed new development and Blindwells and other new towns instead of continually expanding current towns.

Thank you

Chris Davidson

From:
To: [Local Development Plan](#)
Subject: local Development Plan ref: TT12, TT13, TT14
Date: 30 October 2016 10:59:48

Dear Sir / Madam,

I am writing to make objection to the following development plans, TT12 Woodhall Road, TT13 Lempockwells and TT14 boundary of Easter Pencaitland. Pencaitland is a lovely small village which I can see no benefit of increasing in size, the road network at Tynehome cottages is already a bottle neck where the road is basically a single lane due to on street parking this is a corner which is hard to see round and with the addition of the traffic for TT12 & TT13 this would increase dramatically, it is already an accident waiting to happen, not to mention the narrow road crossing the River Tyne. I don't feel the road layout in the village will cater for these developments.

TT12 Woodhall road, we have an issue with children playing on the road and not in the park at the end of the street and this has been helped with the council erecting a playground sign at the beginning of the street and not at the entrance to the play park its self. the additional houses would no doubt increase the number of children playing on the road and also in the number of cars on the road a good mix for safety?

Pencaitland is a quiet peaceful village, I have seen in other developments the council have made in the past in other villages housing people who have caused problems in other areas, just moving the problem elsewhere.

I understand the requirement and need for housing but shouldn't this be done elsewhere and not on the small villages allover East Lothian but on the larger towns where it would have less impact? for instance increase the size of Blindwells village.

regards
Mr Jacob Manning

From: [Fiona Maclean](#)
To: [Local Development Plan](#)
Subject: Re: Proposal for development at Humbie North, Humbie (PROP TT15)
Date: 30 October 2016 11:51:59

I would like to raise a few concerns about the proposed site and the impact it would have on the local community and myself particularly:

1. I would like to know why the land at Humbie was not consulted on through the MIR?
2. The notification of proposed LDP states that "Further engagement work with the Community Council with regard to the proposed site was undertaken in early 2016". However, none of the concerns raised by local residence in those consultation meetings seem to have made any difference to the plan, including the fact that the it still includes a paddock, and they said at one of the meetings they did not want to sell their land. Therefore that land should not be included in the proposed development plot.
3. Additionally, I would be interested to see the assessment that was undertaken for significant environmental impacts. There is no public transport to Humbie, although I believe there will be a bus service again. However, the majority of new residence are likely to have cars, which will double the amount of traffic and therefore pollution in the area.
4. Access to the site through Kippithill. A number of residence in Kippithill made it clear that this would not be a suitable access route either for a building site or indeed a house scheme which doubles the size of the village. The proposed access road is narrow and already has a number of commercial vehicles parked on it, making access to the rest of Kippithill hard enough for residence and emergency vehicles. In addition, Kippithill is a very quiet residential street where children and animals can play safely. This would no longer be the case if it became an access road. It would also make it less safe for the children from the local primary school to get to the football pitch which is on the other side of the proposed access road.
5. Humbie is a quiet, rural village with a thriving local community, and although some expansion would be beneficial, to have a large housing development in a small condensed area on one side of the village, would completely change the dynamics of the village.
6. I am a home owner and when I bought my property over 10 years ago, I was led to believe that no residential properties were allowed to be built at the back of Kippithill. I am therefore concerned about the significant impact this new development will have on both the value of my property and how easily it would sell.
7. I believe a number of other plots were put forward for proposed development and I would like to know why this particular site was deemed more viable than some of the other sites, given the impact it will have on the local residents.
8. At one of the consultation meetings it was said that the developers would be responsible for ensuring that the community resources could serve the new

development, such as the local primary school etc. Give that the proposal could double the size of the village, this is likely to have an impact on the local Primary School, which may need to increase in size. Has any thought been given to how that will be achieved and the disruption that would also cause to the village, or is that "someone else's problem" - the developers problem.

9. In addition we were advised it was the developers' problem to worry about things like the sewage etc. My understanding is that Humbie is already beyond it's capacity and therefore that is likely to cause further work.
10. I would be interested to know what, if any compensation would be available to local residence who's lives are going to be completely disrupted by this proposed development if it goes ahead?

. Any development work is likely to cause me significant stress and distress and could put my health at serious risk. Therefore I would like some reassurance that it is not going to impact on emergency services being able to reach me if necessary and my ability to get an appointment at the doctor's surgery in Pathhead. But of course, I believe things like that are the developers "problem" not for the council.

Basically, I would like to make it very clear that I am completely AGAINST ANY development on the proposed plot. I have no issues with SOME development in the local area around Humbie, but I do not believe an extra 20 houses would be beneficial for the community on any small plot.

Yours

Fiona Maclean

From:
To: [Local Development Plan](#)
Subject: Gullane Development plan
Date: 30 October 2016 17:15:54

2016

29 November

Dear Sir,

1. We request SALTCOATS (NK7) and FENTON GAIT EAST (NK8) and FENTON GAIT SOUTH (NK9) to be removed from the proposed LDP as sites for housing development.

2. It is a Scottish Government Policy to build on Brown field sites. Saltcoats and Fentoun GAIT South are still being used for farming in prime East Lothian countryside. The U.K. IS dependent on 40% of its food imports, and rising, and will depend on U.K. farming for secure supplies. The development would be on prime agricultural land in fertile country, which can produce good food at competitive prices. This application is untimely as its approval would delay the delivery of the brownfield site at the Scottish fire services college, reflecting the Scottish planning policy that Brownfield sites should occur before that of Greenfield sites.

3. Fenton Road is a c road (c111) and would be unsuitable for the number of cars that would use this road. The impact of 300 plus cars on this small road will make it vulnerable to users and pedestrians alike. This road is used by, Dog walkers, Elderly people and the Disabled School for Horse Riding.

4: The impact on school and medical facilities will be a major problem.

5: There is one drain on West Fenton Road which connects to Scottish Water combined sewer, which is unable to cope in excess rainfall. Covering a Greenfield site with concrete will only add to this problem. What plans will be taken to overcome this?

6: There is inefficient parking space at the local shopping area, the development at Saltcoats Site, will require car journeys, to the shops. What plans are there for additional parking?

7: The access to viable public transport (especially trains) is very poor.

8: If the Scottish Fire Site is not developed it will become derelict. In the meantime the weeds at the foot of the site are six feet tall, and the seed pods, drift across to the adjacent gardens covering Lawns, walls and windows what action will be taken to ensure that that proper maintenance will be carried out?

Yours Faithfully

William and Dorothy Miller

From:
To: [Local Development Plan](#)
Subject: Proposed development :Whitecraig
Date: 30 October 2016 18:12:00

Dear Sir

I would like to lodge my objection to the proposed housing development and expansion to the local primary school in Whitecraig village. I recently moved to Whitecraig July 2016 , unaware of any proposed development plans as was my lawyer.

, I was not aware or made aware of any developments. I purchased this house in good faith that the outlook would remain the same and that there was no expansion to the village proposed. I contacted my lawyer who was also unaware of the plans when I purchased the house in July this year. Please enlighten me as to why these were not available for viewing when searches were carried out by my lawyer and how long this has been proposed. I could have purchased a home anywhere but chose this for the whole nature and beauty and peace of the place, the countryside and close proximity to the city and bypass.

I may have to think about relocating in the future to somewhere where housing developments are not in the proposed future.

Louise Adam

The response to the Proposal for development at Bankpark Grove, Tranent (PROP TT5) of

Mr & Mrs T Hepburn

30 October 2016

General Comments

The Musselburgh Bypass, feeding the Edinburgh Bypass and Sir Harry Lauder road is currently beyond capacity and road users experience significant travel delays on a daily basis. Trains are currently struggling with current numbers of passengers, often with passengers being denied access to trains at peak times and with car parking regularly over spilling onto surrounding minor roads. What is being put in place now to mitigate the impact of 10,000 additional houses and the associated number of cars and is there a high level plan for travel infrastructure going forward? We understand that the vast majority of residents in the county have to travel to their employment, which is mainly in Edinburgh and further west. Surely any house building plan for the county needs to include a travel infrastructure plan with a focus on reducing the need for residents to travel west for their employment, where at all possible.

The local development plan is focusing the vast majority of proposed new housing to the west of the county. This will disproportionately impact on the quality of living for the residents in this area due to such things as, road congestion/safety, reduction of open spaces and poorer air quality due to increased traffic.

My wife and I attended the first consultation and were told that the driving force for the planned housing being situated in the west of the county was due to lack of sewage facilities in the east of the county. What is the plan for future development in the next 50 years, as the west of the county is going to be at full capacity and the issue of utilising the land between Longniddry and Dunbar will still remain. This is not an equitable solution for all the residents in East Lothian as residents in the east appear to be largely unaffected, while residents in the west are having their immediate environments changed beyond recognition.

Specifics to Local PlanProposed access to new housing at Bankpark

The roads of Bankpark Crescent and Bankpark Grove were not designed to accommodate the volume of traffic associated with an additional 80 houses (probably a minimum of 100 cars). There is a large number of cars currently parked on both these streets as the original houses and driveways were designed to for one car and the majority of households now have more. This poses an increased safety risk to car users and pedestrians due to the narrow road with numerous sharp turns. In the winter with snow and icy conditions, current road users experience great difficulty in driving up to the A199. This results in many of the residents parking their cars at the top of Bankpark Crescent, and on the A199. This also includes residents from Bankpark Brae and Bankpark Grange. The proposed new housing development will be accessed via a road which is steeper with more

turns than the current residence experience. How will the additional cars from the proposed new development exit the estate to the A199 in the winter?

We anticipate that traffic lights will be installed to accommodate the significant increase in cars joining the A199 via Bankpark Crescent. This will exacerbate further the traffic congestion for both east and west travel on the A199. The year on year increase of traffic using the High Street in Tranent moving west at peak times, will be reduced in speed or stopped more often as a result of these lights, thus reducing air quality for pedestrians (many of whom are school children). As well as the High Street, Edinburgh Road and Church Street air quality will also be reduced. Due to the current level of congestion at peak times the traffic returning to Tranent in the evening in particular moving east, Tranent could become even more gridlocked. Any plan which is likely to add to already worrying levels of congestion, increase safety issues for pedestrians and the reduction in air quality should not be being put forward as a solution. This is obviously a short term fix which is compounding existing problems and will more than likely require extensive additional public finance to deal with the aftermath of the proposed plan.

In the development plan there are referrals to the land west of the new development being 'public land' when in fact it is Private Land owned by the Bankpark Residents. For people who are not familiar with the area, this is very misleading and could influence their opinion.

Land suitability.

We understand that there have not been any site investigations in relation to old mine workings, which are prevalent in the area. If significant concrete has to be pumped into old bottle mines, shafts or tunnels this will impact on the water table.

There is reference in the plan to utilising the views to the north of the site, over the Firth of Forth and the Fife hills for the proposed development. Are there proposals to retain these views for the current residents whose properties border the proposed development?

We appreciate that East Lothian has been set a target by the Scottish Government to build 10,000 houses and the above are our concerns regarding the General Plan and Specific Plans for the proposed Bankpark Development.

From:
To: [Local Development Plan](#)
Subject: Local development plan: proposal for development at land at Glebe Field to the south of Whitekirk (PROP OS5)
Date: 31 October 2016 08:13:26

Dear Sir/Madam

Local development plan: proposal for development at land at Glebe Field to the south of Whitekirk (PROP OS5)

I write on behalf of **Whitekirk Community Company** – of which I am Chairman – to register an interest in the recent proposals to develop additional cemetery space in the village.

The Directors of the Company are concerned that:

- No consultation with the community has taken place regarding the proposals
- The location of the site is too remote from the existing Kirk churchyard
- The size of the proposed site is inappropriately large for the likely need
- The proposed site is currently greenfield, the development of which will require related amenities – car parking etc – that would be an inappropriate visual intrusion to a conservation village

I would be grateful if you could keep the Company informed of any further developments regarding the proposal by mail to the address given below.

Yours faithfully

George Neill

From: [Clare Jones](#)
To: [Local Development Plan](#)
Subject: Objection to inclusion of Saltcoats (NK7), Fenton Gait East (NK8) and Fenton Gait South (NK9) in the proposed LDP as sites for housing development
Date: 31 October 2016 10:42:07

Dear Sir,

I have already submitted my objections to the planning applications for housing developments at Saltcoats and Fenton Gait East in Gullane. Please accept this email as my formal objection to the inclusion of these two sites (NK7 and NK8) and Fenton Gait South (NK9) in the proposed LDP as sites for housing development.

There are very many reasons why I believe the inclusion of these three sites in the LDP would be bad planning. The cumulative total of the proposed housing on these sites (plus the Fire College site, the redevelopment of which I support and do not object to) would be well over 300 new houses in an area that does not have the infrastructure to cope.

I do not believe that it is appropriate to allow development, especially on the proposed scale, on greenfield sites when there is a large brownfield site, within the village boundaries, that remains undeveloped (the Fire College site). Even development of the Fire College site alone would result in a large increase in housing available in Gullane and put pressure on existing services (school, doctors' surgery, roads, sewerage etc) but I accept that Gullane must take its share of necessary new housing in the County. With proper planning, I believe the development of the Fire College site could be managed and could add to the village in a positive way. To add well over a further 200 houses to the village on top of that (by allowing development of Saltcoats, Fenton Gait East and Fenton Gait South) would be unsustainable over-development and would destroy the nature of the village.

In particular, I believe that the inclusion of these three sites in the LDP would be inappropriate because:

- The services in the village could not cope. The local primary and secondary schools are already too full and have insufficient space. The 4 sites could easily produce over 300 new children to be accommodated and this would not be possible. The proposal for 2 new classrooms at the primary school is clearly an inadequate response. The doctors' surgery already struggles to cope with the patients it has to see, meaning very long waits at surgeries. The village hall is already booked to capacity for community groups.

- The proposed developments are not sustainable - in Gullane there is poor access to employment and transport and the roads are already busy and, in my opinion, unsafe, with the current level of traffic. Given the poor public transport links, and limited employment opportunities, the proposed new developments would surely lead to more than 500 new cars in the village. The roads simply couldn't cope and the Main Street, which is already very dangerous to cross at school times, would become unmanageable, especially for younger and older/less mobile residents.

- All of the proposed development sites are at the East end of the village - the opposite end of the village from the shops, Post Office etc so even small errands are likely to involve a car journey. There is insufficient parking for people using the shops already, which leads to illegal, unsafe parking. Any increase in this

would be unsustainable and unmanageable.

- If all 4 of the proposed sites in Gullane are included in the LDP, Gullane will be contributing 50% of all the new sites in the North Berwick Coastal area. This is disproportionate and ill-thought out.

- The scale of change to the village and the time that the developments would take to build would impact on the day-to-day life of people in the village and inevitably on tourism to the village to an unreasonable extent, potentially for over 10 years!

I hope that the Council will see that the browfield site available at the old Fire College is ripe for development and, to my knowledge, has considerable local support. The inclusion of the 3 greenfield sites (NK7, NK8 and NK9) would compromise the delivery of the brownfield site and would have an enormous detrimental impact on the life of the village. I hope that these 3 sites can be removed from the proposed LDP before it is finalised and that work can go ahead on the Fire College site as soon as possible - to avoid it becoming a derelict and dangerous eyesore.

Yours faithfully,

Clare Jones

From:
To: [Local Development Plan](#)
Subject: Proposal for development at Woodhall Road (PROPTT12)
Date: 31 October 2016 11:07:01

I am writing this with no hope of being heard or influencing any decision. As a retired professional I found it difficult enough to access the plan online and considered giving up. The digital age appears to have become a convenient way to ward off any criticism from the general public.

My first complaint is the application for "around" 16 houses - what does this mean? What size are these proposed houses and even more importantly to me what height?

- was granted planning permission for an extension which exceeds the height of my own house which means that I suffered a loss of light but it wasn't seen as enough to warrant rejection of the proposal or modification. I am now faced with a similar situation to the other side of my house but on a larger scale. I will be going from living in a house with open outlook to becoming part of a housing scheme of unknown size. If this proposal goes ahead will it mean a precedent has been set for further expansion?

I write to wholeheartedly object to the proposal on the grounds of loss of residential amenity. The scale is out of keeping with the proposed site and will detract from the area.

Yours sincerely,

Margaret Clarke

From:
To: [Local Development Plan](#)
Subject: Innerwick PROP DR10
Date: 31 October 2016 11:34:17

I write with regards the aforementioned proposal in the East field at Innerwick.

Contact details:
Mr Neil & Mrs Katrina Kenny

A group of village residents attended the Community Council meeting on 25.10.16 to discuss the development. It was clear that residents were not in favour of it. Michael Veitch was also present at the meeting and was going to put forward our representation to the appropriate department at ELC.

We would like the following points:

> the current infrastructure around the village is not adequate to deal with an additional 18 houses. The main Innerwick access road is too narrow and at peak times is a nightmare due to irresponsible drivers going too fast and ignoring the fact that it is an especially narrow road.

The kids who attend Dumbarton Grammar School are currently picked up directly opposite the Kirk Brae junction. In addition to this there is an unofficial bus stop, right on the junction. More traffic will only add to this utterly dangerous situation.

> The current water supply within the village is seriously inadequate. This has become worse since the Templemains Development. The water pressure is extremely low, allowing the flow to be little more than a trickle. To be blunt if you do empty your bowels when you use the toilet there is not enough pressure to flush it away. You have to wait for a basin to fill with water and flush it through with that. Drains are another problem, they are continually becoming blocked in Kirk Brae, nothing worse than a pile of raw sewerage in the back garden! How will the dated system deal with more housing?

> Innerwick is a conservation village. Why not leave it as a village?

> more opportunities for crime. How do we know as Villagers who will end up in any new houses?

> Power. It doesn't take much for the village to lose power. Usually, wind rain etc. Could our current sub station actually deal with more demand?

> We bought our home from ELC as many others have. Every time our home has been surveyed they have commented on the view and the wide open space and have told us that, that alone would sell our house and certainly added to the value. Why should people lose money on their properties so that the farmer can gain with no compensation. Why should we have people looking directly into our homes? Where is the privacy?

> There is nothing in Innerwick. no shop, post office pub, adult groups anything, There is only stuff to do if you have toddlers. What is there to attract new residents?

> Before I lived here I stayed in Dunbar. I witnessed the beautiful woodland being ripped down for developers greed and the change in lifestyle. Before those houses were put up you could leave your door unlocked, bikes or toys at the side of your house and have pots and decorations in your garden. afterwards several residents had stuff stolen from their gardens only for it to be found smashed to smithereens in the shortcut through the woods. In addition to this there was an overall increase in crime and even Peeping Tom. We do not want this for our village.

> The Templemains Development was never finished and they had serious difficulties selling the houses which were completed. There are at least 4 houses up for sale currently at Hunter Steading, Is there really a need for any more?

> There is another field on the other side of the current play Park and primary school which, if it was to be developed would not be looking directly over anyone else and access is already there. Why has this not been considered?

I do hope you will consider our points sympathetically.

Yours sincerely

Neil & Katrina Kenny

From: [kevin bowler](#)
To: [Local Development Plan](#)
Subject: Proposed development plan for Dunbar
Date: 31 October 2016 11:36:07

After a look at the proposed development plan and the future increase in the number of houses within Dunbar in the future, I would like to make the following comments,

1. The council needs to have a formal strategy in place on improving the infrastructure in support of this increase in population. Not only do we need more school and doctors places but the local road system needs upgrading to cope with the increased traffic. Local shops need to be upgraded. The addition of a McDonalds is not sufficient as all this has done is increased litter. A better supermarket must be brought to Dunbar to feed this increased population.

The increase has brought an increase in pets and in turn "mess" with no addition to the local number of serviced litter bins to deposit waste.

2. Better council oversight of the building contractors is required. Halhill woods are littered with debris blown off of the building site due to poor waste control. Regular visits are required to control the building process to ensure minimal disruption to those already living here.

3. As it is the council that approves planning you should also be inspecting the quality of the works. Works to tie in the drainage system for the Earls Gate development on Brodie Road has left an unsatisfactory finish on the road surface at the junction with Moray Ave, and this type of defect needs to be chased down and rectified early. This is just one example.

Not only the houses and areas to be adopted by yourselves but you should ensure that the common areas of developments are completed to the requirements of approved site drawings. It is not acceptable that the new home owners should be left to battle with builders to complete these areas to a satisfactory standard. You approved the plans, you ensure completion!

Thanks and regards,

Kevin Bowler.

From: [Brian Morland](#)
To: [Local Development Plan](#)
Subject: Proposed development at Whitecraig south
Date: 31 October 2016 12:03:15

Hello

I'm writing to comment on the notice I received relating to the East Lothian local development plan on the 16th September 2016 as it relates to the proposed plans for building developments at the Whitecraig south site.

After reading the main issues report online I would very much have liked to have had my say on many of the areas that the local development plan covered but this recent notice has been the first time I've been made aware that there was a plan available for comment and I see the time passed for this in February 2015. Maybe next time something like this is made available for comment it could be ensured that all local residents are made aware.

I can't find any detailed information or plans relating to the proposed development of Whitecraig south so all I can do is give my opinion using the little information I have found and hope it's correct.

1. As far as I'm aware the intention is to build around 300 new homes on this site and that the access to these would be from Whitecraig Avenue. I think this might need to be rethought. Whitecraig Avenue had to be altered just to cope with the new council houses built in 2011 and it is still a heavily used road that is only just servicing the existing community. I think that both for traffic flow and more seriously for safety due to the number of young families in the area it would be totally unsuitable to use it for the traffic associated with another 300 homes so another access point would definitely be needed.

2. The site at Whitecraig South is, again as far as I am aware, still designated green belt and although it may not be the most picturesque space around it is still open green space that is important to the current residents. Couple this with the fact that this particular green belt space borders onto Midlothian and helps define that border that is already disappearing on the Midlothian side due to the extensive development around Dalkieth.

3. Any housing development in this area would also require some extensive investment in the current infrastructure. As well as extending the primary school and creating a solution for a local secondary school I believe it would be advisable to make some investment in other local facilities. This area, as you know, is one of the more deprived areas in East Lothian and building more houses will not help that situation. The site of the old bowling club on Whitecraig Avenue is still sitting as vacant wasteland even though there has been new council houses built and road repairs in Whitecraig and many other improvements in other areas of the county such as the skatepark in Haddington.

I believe a bit more could be done to help improve the lives of the current residents before introducing another 300 families.

4. The extensive building works currently underway around Wallyford will already be putting more strain on local services and more housing in and around Whitecraig will also increase that. I also believe that by pushing so much of the required development to the west of East Lothian it is serving not to help regenerate East Lothian itself but just extend the urban sprawl of Edinburgh and service its need for more commuter belt. If this is needed then surely it would be better to concentrate on areas around easier access to the east coast rail line as this is a much quicker and more environmentally friendly way to commute.

5. If it is absolutely essential to build more housing in Whitecraig then I would say that the site at the north of the estate would be more suitable. It would provide much better and safer access from the existing cowpits road and would have better connections to all the amenities in Musselburgh as well as not helping reside the border with Midlothian.

Thank you for taking the time to read my concerns over this proposal. While I understand that you are under pressure from government to provide more housing I hope you recognise the needs of all the people currently residing within East Lothian and will take their views seriously when making these decisions that will seriously affect their communities both now and in the future.

Your sincerely,

Brian Morland

From:
To: [Local Development Plan](#)
Subject: Representation to Policy TC1 on behalf of Royal Mail Group.
Date: 31 October 2016 16:20:04
Attachments: [image002.png](#)
Importance: High

Dear LDP,

Please accept this email as the above representation on behalf of Royal Mail Group (RMG).

Background

Royal Mail is the UK's designated Universal Postal Service Provider, supporting customers, businesses and communities across the country. This means it is the only company to have a statutory duty to collect and deliver letters six days a week (and packets five days a week) at an affordable and geographically uniform price to every address in the UK. Royal Mail's services are regulated by Ofcom. It also operates Parcelforce Worldwide which is a parcels carrier.

The United Kingdom letter post business was fully liberalised in January 2006 and Royal Mail operates in a highly competitive market place. Royal Mail is continually seeking to find ways to improve the efficiency of its business, anticipate its customers' needs and respond flexibly to changes in communications technology.

Representation

The majority of Royal Mail Delivery Office (DO) property would fall within use class 6. Further, most DO property has a public desk for members of the public to pick up special mail. As such, many of the DOs of the scale of those in E Lothian are located in or close to Town Centres.

As RMG is a statutory service provider, it is imperative that the existing RMG property continues to function uninterrupted and it is therefore important that emerging policy protects these operational properties and the service they provide to the businesses and residents of E Lothian.

It is considered that Policy TC1 of the Development Plan fails to adequately protect existing Class 4, 5, and 6 operations. As such we would request that the wording below highlighted in red be included within the policy in order to provide the necessary protection.

Policy TC1: 'Town Centre First' Principle

A sequential 'town centre first' approach will be applied where appropriate to retail, commercial leisure, office and other development proposals that would attract significant footfall. Applicants should provide evidence that locations have been considered in the following order of preference:

- 1. Town centre or local centre as shown on the Proposals Map;*
- 2. Edge of town centre or local centre*
- 3. Other commercial centre;*
- 4. Out-of-centre locations that are, or can be made, easily accessible by a choice of transport modes.*

Out-of-centre locations will only be considered where an applicant can demonstrate that:

- all town or local centre, edge of centre and other commercial centre options have been assessed and discounted as unsuitable or unavailable;*
- the scale of development proposed is appropriate, it cannot reasonably be altered or reduced in scale to allow it to be accommodated at a sequentially preferable location;*
- the proposal will help to meet qualitative or quantitative deficiencies; and*
- there will be no significant adverse effect on the vitality and viability of existing centres.*

In all cases the scale of development proposed should be appropriate to the scale of settlement and the role and function of the centre where it is proposed. Large scale developments will not normally be appropriate in local centres.

In determining whether it is appropriate to apply the sequential approach to a particular proposal, the Council will have regard to the scale of development and its intended catchment area as well as to other planning objectives.

Some Class 4, 5 and 6 proposals may be better located on land allocated by the Plan for such use. Any proposals for such uses will be assessed on their merits and will be supported in town centres where their impacts will be acceptable, taking account of other relevant Plan policies.

Existing Class 4, 5 and 6 premises and operations will be protected from neighbouring proposals that may adversely impact the existing operation or may be inappropriate to be located adjacent to the existing operation.

A more flexible approach will be applied to community, education and healthcare facilities.

I would be grateful if someone would acknowledge this submission and trust that it will be fully taken into account in drafting the final proposed policies.

Thank you and kind regards,
Katherine

Katherine Brooker, MRTPI
Associate Director, Planning and Development – North East
UK Development

Download the new Perspectives Magazine [here](#)



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at Estates Gazette Awards 2016



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From: [Dominic Holding](#)
To: [Local Development Plan](#)
Subject: RE: Technical Difficulties (Representations to the East Lothian Development Plan) [NLP-DMS.FID57889]
Date: 31 October 2016 15:26:07
Attachments: [image001.png](#)
[image002.png](#)

Dear Sir / Madam

Further to my email below, I set out our representations below. I would be grateful if you could process these given the technical difficulties we are having with the website.

We are a planning consultancy representing Bourne Leisure Ltd. We have set out our suggested amendments to policies EGT1, EGT3 and MIN8 in bold text below.

The justification for our suggested alterations is the need to protect the amenity of existing residential/tourism development in East Lothian and the economic benefits associated.

I would be grateful if you could confirm receipt of these representations; should you require anything further from us, please let me know.

PROP EGT1: Land at Former Cockenzie Power Station

The site of the former Cockenzie Power Station is safeguarded as a site for future thermal power generation and Carbon Capture and Storage, consistent with 'National Development 3' in the Scottish Government's National Planning Framework 3. Other forms of development within the site will not be supported during the lifetime of NPF3 to avoid prejudicing its future use for this National Development, unless and until an appropriate thermal power generation proposal is implemented and the extent of any residual land that could be used for other purposes has been confirmed.

*If the NPF position is reviewed by Scottish Government during the lifetime of this Plan the Council will prepare Supplementary Guidance to guide the redevelopment of the site, if appropriate consistent with any revised NPF. If any thermal generation proposal is implemented and there is surplus land remaining, Supplementary Guidance will be prepared to guide redevelopment of this surplus land. Any redevelopment proposal will be expected to make best use of the location's assets and bring significant economic benefits. Proposals will be subject to a Habitats Regulations Appraisal and, if necessary, an Appropriate Assessment under the Habitats Regulations. **Proposals must not cause an unacceptable impact upon the amenity of existing residential and tourism/ leisure development in the local area.***

PROP EGT3: Forth Coast Area of Co-ordinated Action

The Council supports the principle of electricity grid connections on the Forth coast from Cockenzie to Torness in order to facilitate off-shore energy generation, provided the following criteria are met:

- infrastructure is combined wherever possible;*
- connection to existing infrastructure at Cockenzie and Torness is prioritised; and*
- proposals must not have an adverse effect on the integrity of the Firth of Forth SPA or any other European site designated under the Habitats Directive either alone or in combination with other projects and plans.*

Proposals must be accompanied by project specific information to inform an Appropriate Assessment under

*the Habitats Regulations development and the export of electricity. The Council supports this in principle in appropriate locations. The environmental impacts of any proposals for new or upgraded high voltage onshore transmission lines will need to be carefully assessed and appropriate mitigation provided, including potential undergrounding cables. Proposals should minimise the landscape and visual impact, as well as impacts on communities, **tourism** and the natural and built heritage. Where new lines replace existing lines that will become redundant the Council will seek removal of redundant lines as a requirement.*

Policy MIN8: Mineral Extraction Criteria

Proposals for surface mineral extraction or for the extraction of onshore oil or gas or coal bed methane will only be permitted where there will be no significant adverse impact on the environment or the local community. Proposals will be assessed against other relevant LDP policies and must meet all the following criteria:

1. There would be no unacceptable environmental impacts, including from disturbance, disruption, noise, dust, vibration, seismic activity, blasting, traffic, visual intrusion, landscape impact, or pollution, on any of the following:

- a. the character, setting, appearance and amenity of the area, including any settlements;*
- b. natural heritage interests, including biodiversity and geodiversity;*
- c. all land, but especially prime agricultural land, carbon rich and rare soils;*
- d. the water environment;*
- e. air quality;*
- f. cultural heritage;*

g. tourism

e. any other sensitive receptors.

2. There would be no significant loss of public access to or enjoyment of the countryside, including the use of rights of way, the core path network and the John Muir Way;

3. The development would not be conspicuous when viewed from any of the following major transportation corridors and tourist routes:

- a. any part of the A1 trunk road*
- b. the A199 between Macmerry and Dunbar*
- c. the Coastal, Hillfoot and Saltire tourist trails*
- d. the East Coast Main Line railway and North Berwick branch line;*

4. The development would not have a significantly adverse cumulative impact on the environment or on local communities when combined with the effects of other existing or consented mineral workings;

5. Where there is a material risk of disturbance or environmental damage, this is outweighed by demonstrable and significant local or community benefits related to the proposal.

6. In the case of proposals for surface minerals extraction, the proposal is for a specific type, quality and quantity of minerals required to meet an established need, and which are not available from:

- a. sites with existing permissions; or*
- b. through the use of suitable secondary or recycled materials.*

Dominic Holding Planner

Nathaniel Lichfield & Partners, Generator Studios, Trafalgar Street, Newcastle Upon Tyne NE1 2LA
T 0191 261 5685 / E dholding@nlplanning.com

nlplanning.com

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From: Dominic Holding
Sent: 31 October 2016 15:18
To: 'ldp@eastlothian.gov.uk'
Subject: Technical Difficulties [NLP-DMS.FID57889]

Dear Sir / Madam

I am having issues submitting representations to the East Lothian Proposed Local Development Plan. I've entered the necessary information but when I select 'finish' the web page repeatedly crashes. Is the website experiencing difficulties?

Please can you confirm that we have until 7 Nov 2016 to resolve this? We previously understood that consultation would be closing today.

Kind Regards

Dom

Dominic Holding
Planner

Nathaniel Lichfield & Partners, Generator Studios, Trafalgar Street, Newcastle Upon Tyne NE1 2LA
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nlplanning.com  



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 Think of the environment. Please avoid printing this email unnecessarily.

P. W. MILLARD,



27/10/16

Dear Sir

Juliane Development plan

We wish to object to

the development plans for Saltcoats, Penton Fair East and Penton Fair South for the following reasons.

1. The proposals will completely ruin the beautiful village of Juliane - It will become overpopulated and without the necessary infrastructure, schools, medical facilities and shops to service the proposed increase in population.

2. The High A1 through Juliane is already a nightmare with totally inadequate parking. There are already two

areas where people are performing 'U' turns which are extremely dangerous. There are also delivery lorries parked in the middle of the road, causing endless hold ups. Finally the high @ is an accident area waiting to happen and if you go ahead with dozens more incidents with cars, it will create total chaos.

3) There is no new employment opportunity in various schemes, and the train service to Edinburgh is already over-stretched because of a lack of new carriages.

4) The whole set of proposals are irrelevant to the local situation & should be scrapped.

Yours faithfully

(MILLARD)

Maggie MacSporran

RECEIVED

31 OCT 2016

PROPOSAL MH9.

I AM WRITING WITH REGARD TO THE PLANS FOR DEVELOPMENT MH9 WITH PARTICULAR REGARD TO LAND ADJACENT TO WALLYFORD FARM COTTAGES EH21 8PL

I HAVE READ THE SURVEY AND WAS SURPRISED TO SEE THAT THE PAIR OF SPARROWHAWKS AND THE BATS WHICH WERE APPARENTLY EVERY PLEASANT EVENING WERE NOT MENTIONED. I SAW AT THE LOWEST ESTIMATE 3-5 BATS MOST NIGHTS. THE REMOVAL OF GARG, MATURE TREES ON 1ST AUGUST COINCIDED WITH THE DISAPPEARANCE OF THESE CREATURES.

THE TREES WERE ON THE PERIMETER OF THE SITE AND COULD EASILY HAVE BEEN PRESERVED ACCORDING TO COUNCIL GUIDELINES.

I FIND IT VERY HARD TO BELIEVE THAT A SURVEY OF ANY KIND WAS CARRIED OUT IF BATS AND SPARROWHAWKS WERE UNNOTICED AND MATURE TREES WERE NOT PROTECTED.

I AM FINDING IT IMPOSSIBLE TO DISCOVER WHAT BARRIER WILL BE BETWEEN THE SITE AND TRACK, WHEN WORK FIRST BEGAN THE HEDGES FENCE WAS AROUND 10 FEET IN. THEN ON AUGUST 1ST ALL THE TREES, HEDGE ROW ETC WERE WIRED OUT AND THE FENCE WAS MOVED TO A FOOT OR SO FROM THE EDGE OF THE TRACK. THIS HAS THE EFFECT OF MAKING US FEEL UNCOMFORTABLY CAGED. IT WOULD BE APPRECIATED IF THE NATURE AND POSITION OF THE PERMANENT BARRIER COULD BE MADE CLEAR AND

IT COULD BE INSTALLED GIVING US A BIT OF A
SHELTERED ZONE AS SOON AS POSSIBLE TO GIVE
US THE CHANCE TO PLANT TO ENCOURAGE WILDLIFE.
IT WOULD ALSO BE REALLY NICE NOT TO BE LOOKING
THROUGH AN 8 FOOT MESH FOR THE NEXT UNPLEASANT
YEARS.

I AM ALSO CONCERNED ABOUT THE PROPOSED GATEWAY
AND OUR ACCESS FROM THE ROAD. ANY QUESTIONS TO
THE SITE MANAGER AND SURVEYORS HAVE ELICITED
A "PLANS NOT FINALISED RESPONSE. WE WOULD
REALLY LIKE TO KNOW WHAT EXACTLY IS PLANNED
AND WHAT IMPACT IT IS EXPECTED TO HAVE ON ACCESS,
TRAFFIC VOLUME AND INFRASTRUCTURE.

SINCE THE REMOVAL OF THE TREES + HEDGING
WE NOW ENJOY LIGHT AND NOISE POLLUTION
AND A LOT MORE WIND.

WHAT USED TO BE A HIVE OF ACTIVITY IS NOW
A WASTELAND. NO BLACKBIRDS, ROBINS, WRENS,
TITS, FINCHES, SISKING, NO HEDGEOGS. 3 OF THE
5 SPECIES OF BEES I COULD IDENTIFY GONE.

I REALISE AND ACCEPT THAT DEVELOPMENT HAS TO
HAPPEN. I WOULD LIKE TO THINK THAT THE COUNCIL
CAN ENSURE THIS CAN HAPPEN WITH SOME SENSITIVITY
KNOWN TO THE EXISTING ENVIRONMENT AND RESIDENTS
OF ALL SPECIES.

YOURS.

Policy & Projects
Development
Partnerships & Services for Communities
East Lothian Council
John Muir House
Haddington
EH41 3HA

31/10/2016

Dear Sir,

Response to Consultation on Proposed Local Development Plan

I have included as an attachment, my earlier letter of objection to the premature application 16/00594/PPM – Saltcoats, to which I refer in this letter.

The main thrust of the objection was the unacceptable impact on vulnerable users and on residents and visitors to West Fenton attempting to use the road between West Fenton and Gullane. I will not repeat the detail here, but refer you to the content of the objection.

More generally the proposal made in the plan for development is for 4 sites in Gullane, all within close proximity to each other, all at the opposite end of Gullane to where its facilities are located in a Conservation area.

These proposals show no appreciation of the value of what would inevitably be destroyed for the future both in Gullane and in the historic Ferm Toun of West Fenton (with its significant set of historic listed buildings). This is irreplaceable. The proposals appear to have been considered on a site by site basis rather than by looking at the overall effect of four sites. No Environmental Impact Assessment has been made at that level either of the impacts within Gullane or West Fenton. No cumulative assessment has been done. The total scale of development at 30% increase is totally at odds with the SESPlan, with 3 major sites, when there should really be none, or certainly no more than the brownfield Fire Station site, given the nature of the overall location.

ACTION ASKED FOR

1. Continue to include the Firestation Site (NK6).
2. Remove Saltcoats Field (NK7) and Fenton Gait East (NK9) – in that order given their relative impacts – from the list of sites to be allocated.

Yours faithfully,

Martin White

Environment
John Muir House
Brewery Park
Haddington
EH41 3HA

31/08/2016

Dear Sir,

Objection to Planning Application 16/00594/PPM - Saltcoats

I object to this application on six grounds; 1. impact on use and amenity of the West Fenton Road 2. safety impact relating to leaving and entering my property and others at my end of West Fenton 3. inappropriate location for houses from which the vast majority of people will be commuting daily to Edinburgh 4. impacts from houses outside convenient distance to local facilities 5. prejudice of important decisions yet to be made in the Local Development Plan 6. prejudice in delivery of the brownfield Firestation site.

1. It is obvious that this development would generate a significant increase in traffic along the West Fenton Road. How significant is unclear, given that the Applicant seems to severely underestimate the future traffic using a route south of the site rather than to its north. It is unclear whether the traffic would include construction traffic, but if it does the concern would be further magnified. The nature of the road will make it unsafe for the use of pedestrians, cyclists and any other vulnerable users. All journeys from West Fenton to Gullane will have to be made by car, and many options for exercise and recreation will be removed. It will be impossible for children to safely walk to the primary school. Even if the landowners involved were able to agree to footpaths, it is impossible to see any viable intervention that could address this without otherwise destroying the amenity of West Fenton, the remnants of the old Ferm Toun along with the context of its B listed buildings and high hedges. In the places where you could put any pavement behind a hedge that would be a security concern due to the lack of visibility.

A number of statements in the Application seem to imply the urbanisation of West Fenton and the road into Gullane. This seems to me to be entirely the wrong approach to take to the Countryside. Large numbers of walkers and cyclists enjoy this area, and so do we, because it is the countryside rather than some sort of suburb of Gullane. Our amenity would be seriously damaged.

2. We do not see how we and our visitors could safely enter and leave our property, and this applies to an even greater extent for others at our end of West Fenton. We are in a hidden dip. On the occasions when the road at Archerfield has been blocked due to an accident, and traffic has been diverted via West Fenton we have been trapped in our house for lengthy periods. Expecting visitors to be able to manoeuvre in and out of very awkward entrances to these roads with significantly increased levels of

traffic is just not safe or viable, and would greatly damage the amenity of our and others property here.

3. The vast majority of the occupants of these houses will commute daily to Edinburgh. The vast majority of these will use cars. Given the distances and issues with road networks this is entirely the wrong location for more houses both from a practical and green emissions viewpoint. They need to be located nearer to Edinburgh or in locations more accessible to and from Edinburgh.
4. The location of these houses is such that virtually all local errands will be done by car, further compromising the future of the 'centre' of the village, which is at completely the opposite end of the village, and is already becoming a problem for parking and the context of the conservation area there.
5. There seem to us to be reasons of wider context that would make this site inappropriate, and for example, its inclusion seems at odds with the SESplan and a strategy of concentrating development in the West. We believe it would be entirely premature to approve this application without the broader points being settled within the Local Development Plan upon which we will be making representations.
6. If for no other reasons than commercial ones, the brownfield site will not be effectively delivered were this and other greenfield sites be given planning permission. They should in any case not be given approval in advance of the full delivery of the Firestation site.

Yours faithfully,

Martin White



24/10/2016

Dear Sir/Madam,

I am writing to register my objection to East Lothian Council's proposed Local Development Plan (LDP). I have already registered my objections to two current planning applications in Gullane from CALA Homes (Planning Applications 16/00594/PPM and 16/00587/PM) and I include copies of those objections at the end of this letter.

My principle reason for now strongly objecting to the proposed LDP is the massive scale of development shown in the plan for Gullane and its' cumulative and damaging effect on the village.

It is quite shocking to find that the LDP contains proposals to outline not 1, not 2, not even 3 but FOUR zones for housing development within a single small coastal village in East Lothian, namely Gullane.

If this were to go ahead unchecked, Gullane village would simply be overwhelmed and would cease to exist as we know it. The cumulative impact of the 4 proposed housing developments is quite staggering on many levels. The key causes of the adverse impact are as follows :

- A total of **344** new houses would be built
- An estimated **593** extra vehicles would be driving on local roads
- The potential of an extra **382** school age children & **107** additional pre school children who would require school or nursery places
- An estimated further **344** commuters would drive in and out of the village daily or require access to public transport links

Put simply, these numbers show the massive scale of over development that one village community would be asked to absorb and that by proposing all 4 sites to be allocated for housing development, it ultimately displays extremely poor planning.

Why? Because it is clear that there has been no, or very limited, thought on what this scale of development would do to a single, small village community. Yes, it is Gullane where I currently live but the objection rationale would be just as relevant and true for any other village community in the East Lothian Coastal area.

There should have been many considerations given to what the resultant impact on local village life would be but it appears that this thought process has not been followed through. Some of the key impacts on Gullane would be :

1. The inclusion of all 4 sites in Gullane would result in the village contributing 50% of **ALL** new housing zones within the North Berwick coastal area. I cannot see how this is balanced or could be seen to be asking Gullane to "take its fair share" of local development in the county.
2. The cumulative adverse impact has not been properly assessed, especially the impact on the local rural road network. Gullane main street currently suffers from a serious lack of parking, heavy through traffic congestion and constant speeding. These issues will increase markedly with around 600 extra vehicles requiring access to shops, community facilities, schools and doctors, surgeries as well as the envisaged extra 344 commuters driving out and in to the village daily or trying to access the nearby railway station at Drem where current parking issues are a serious problem. The Drem link will be particularly tough on users of the C111 towards West Fenton. This road is classed locally as a lane with dangerous narrow bends, no footpath and is regularly used by walkers, cyclists and horses. These vulnerable users will be in real danger given the huge increase in traffic, particularly from the largest site at Saltcoats Field.
3. The massive overstretching of scant local amenities. The village school and medical facilities would be seriously compromised given the projected increase in population. An extra two school classrooms as proposed by East Lothian Council is utterly inadequate. The village medical practice already covers Gullane itself and the nearby communities of Dirleton and Aberlady. I fail to see how one practice could be scaled up to meet the expected level of new demand. There is a similar outlook for community facilities such as the Village Hall. I cannot understand how the projected level of increased demand from all 4 sites being developed can possibly be met.
4. The actual scale of change and its' duration of development of at least 10 years cannot be mitigated against thus adversely affecting local tourism and most fundamentally, the very day to day life in the village itself.
5. The delivery of such a scale of development sites will not be sustainable as they have poor access to employment and a range of expected services. They will clearly damage future opportunities for leisure and recreation in one of the region's most attractive locations.

In summary, I just cannot comprehend how the proposed LDP has included 4 zones for housing development in one East Lothian coastal village. I urge East Lothian Council to look again at this and request that they remove three of the sites proposed for housing development (NK7 Saltcoats, NK8 Fenton Gait East and NK9 Fenton Gait South) and retain the proposed brownfield development of 125 houses on the old Fire Training College site.

That surely would be Gullane taking on its' fair and appropriate share of housing development in East Lothian given its' size.

Yours faithfully,

Mr W Watson

12/08/2016

Planning Application No. **16/00594/PPM**

Dear Sir/Madam,

I am writing to register my objection to the above Planning Application by CALA Homes.

I strongly object to the CALA development proposal at Saltcoats Field in Gullane for the following three main reasons ;

1. Environmental Impact

Scottish Planning Policy states that brownfield development should take precedence over greenfield development. In Gullane, there is already a proposed brownfield development on the site of the old Fire College which will deliver a range of housing and some small industrial units and which would have minimal impact on the current village footprint.

However, the CALA proposal would be to build 150 houses on prime agricultural land in the countryside and would massively change the current village footprint and ruin the amenity of the Gullane Conservation Area.

Contrary to CALA's planning application (Appendix A Scoping ; Page 32) which stated that the year of completion is "assumed" to be 2020, I believe that the actual scale of the proposed change would result in a more realistic development timescale of up to 10 years which would be very difficult to mitigate against, thus impacting tourism and most importantly, the basic day to day quality of life for the village inhabitants for a very long period of time.

Gullane currently suffers from a large volume of through and local traffic coupled with very limited parking facilities. The CALA proposal would clearly result in a high increase of road users given its proposed location as people would have to drive to access local shops and facilities. This in turn would result in increased traffic noise, more pollution and certainly a rise in pedestrian safety concerns.

2. Local Infrastructure

Gullane is a village, not a large town. It has a very limited range of local facilities which already struggle to match an increased level of population. The CALA proposal for a further 150 houses at Saltcoats Field would greatly exacerbate this situation and would have a major and adverse impact on the local school, medical practice and community facilities.

The Medical Practice runs at near full capacity now. Based on the scale of the CALA proposal, the quality of service provided to residents would certainly deteriorate.

05/09/2016

Planning Application No. **16/00587/PM**

Dear Sir/Madam,

I am writing to you to register my strong objection to the above Planning Application by CALA Homes.

I object to the proposed Fenton Gait East development by CALA Homes for the following reasons.

If allowed to proceed, it would have a substantial and very detrimental impact on the local environment. It appears to fly in the face of current Scottish Planning Policy which advocates that brownfield development should take precedence over greenfield development. We have the situation in Gullane where there is already a proposed (brownfield) development on the old Fire Service Training College site which would deliver around 125 house plus some small industrial units and which would have little impact on the village footprint.

This application by CALA however, aims to build around 50 houses on prime agricultural land in beautiful countryside and would significantly alter the current village footprint and destroy the amenity of the Gullane Conservation Area.

I believe that this proposal would result in a long delivery timeline as it will inevitably be done in series with the other CALA development proposed at Saltcoats Field. I estimate that we could be looking at a timescale of between 5 and 10 years to complete all building works. This would be impossible to mitigate against and so would clearly hit local tourism and most importantly, reduce the quality of the day to day life of the village and surrounding population for a very long period of time.

Gullane is a small village community. As such it has a very limited number & range of local facilities which already struggle to meet demand from an increasing population. The CALA proposal would simply overwhelm the facilities available and would have a major and adverse impact on the local school, medical practice and community facilities in particular.

The proposed development would mean a substantial increase in local road usage with the entrance to the Fenton Gait East site planned to come off Gullane Main Street at a point where the 30 mph limit (just) commences. As a large % of traffic entering and exiting the village now do NOT reduce their speed by this point, there could only be a massive increase in road safety fears for motorists and also for local pedestrian and bicycle traffic from this proposal.

The increase in traffic volumes will also impact wider road & rail links used by tourists visiting the immediate area and local people travelling to elsewhere in East Lothian and beyond for work and leisure. There is already a serious traffic issue with rail passengers' cars trying to access the limited public parking facilities at both Drem & Longniddry railway stations.

The CALA proposal would only increase demand and thus cause considerable traffic & pedestrian safety issues around both railway stations.

In summary, I sincerely believe that this proposal would be an extremely harmful one for Gullane in Environmental and Local Infrastructure terms. The greenfield developments proposed by CALA would be a massive overdevelopment, increasing the village size by nearly 30%. The result would be to completely overwhelm the very limited local infrastructure and would ultimately lead to the demise of the amenity and community life of the village.

The proposed development is not consistent with current Scottish Planning Policy and has been submitted before the publication of the Local Development Plan.

I strongly urge East Lothian Council to reject this CALA proposal and I hope to hear from them in due course on their deliberations and decision on this ill-advised planning application.

Yours faithfully,

Mr W Watson

From:
To: [Local Development Plan](#)
Subject: Objections to Local Development Plan
Date: 31 October 2016 17:53:45

I am writing to lodge my objections to the draft LDP. Specifically, I object to the inclusion of four separate sites, three of them greenfield, in Gullane. My objections are based on two substantive issues:

- the combined scale of the potential developments and the inability of the infrastructure to absorb them
- the unique geography of Gullane which would make these developments too concentrated.

The combined scale

If all four sites listed in the LDP were to be developed, there would be an estimated 344 additional homes built in Gullane. This would represent an expansion of the village of over 30%, yet it is clear that the infrastructure could not grow to absorb such an increase. The school is at capacity, as are the GPs' lists, the roads are already inadequate, parking is a significant problem, there is little public transport and it is irrefutable that the over-reliance on cars will become even worse. The character of the village would be transformed, and the risk of driving away tourist income would be significant. Whilst one can have sympathy with the position that ELC has been placed in by the Scottish Government, these proposals lack understanding and imagination. It is not a game of Monopoly.

The unique geography

Even if expansion of a village on the scale proposed is considered desirable, even the most junior planners would attempt to balance the expansion and spread it out across the village. Gullane presents unique problems in achieving this. To the north, there lies Gullane Bents, the beach and the sea. To the west, there are the Gullane golf courses, a magnet for tourism. To the east, there is Muirfield, a jewel in East Lothian's crown. The centre of the village is a conservation area already over-developed with in-fill. It is only to the south, and beyond the village boundary, where there is arguably expansion potential. To load the three proposed greenfield sites into that area, requiring a car journey to the village shops for even simple errands (not that it would be possible to park, except on Goose Green) makes no sense. By contrast, the proposed brownfield redevelopment of the Fire Service training College at the heart of the village makes perfect sense, and should be welcomed. It would be unforgivable, and a dereliction of duty by the Council, if they created a situation where greenfield development went ahead at the expense of this prime brownfield site.

For these reasons, I am requesting that SALTCOATS (NK7), FENTON GAIT EAST (NK8), and FENTON GAIT SOUTH (NK9) be deleted from the draft LDP.

Colin Hawksworth

Longniddry Community Council



31 October 2016

Policy & Projects
Development
Partnerships & Services for Communities
East Lothian Council
John Muir House
Haddington
EH41 3HA

Dear Sirs

Local Development Plan

With reference to the above Longniddry Community Council would like to make the following comments and observations, which includes our views on the proposal to build 450 houses at Longniddry Farm to the south of the railway line.

There are a number of points that we would like to raise as follows:

Road & Rail

It is clear from the scale of the development in the proposed Local Development Plan (LDP) for East Lothian that improvements to the transport infrastructure will be required to cope with the demand from this development. The list of proposed improvements are welcomed and it is essential that they are implemented at the appropriate time in order to avoid the build-up of congestion.

There is already a capacity issue on peak hour trains which needs to be addressed as a matter of urgency. We understand that capacity will be increased next year with the introduction of 6 coach trains as part of the new ScotRail fleet but during busy periods with the year, such as the Edinburgh Festival for example, short term measures to increase train capacity would be welcomed.

There is also a problem with car park capacity which needs to be addressed to cope with current demand before any new developments, both in Longniddry and elsewhere, come on stream. Land is available and additional spaces could be put in place quickly. At the moment, numerous overflow cars are parking in Lyars Road, Longniddry, which is not an ideal solution.

In respect of the existing railway station, access to the station platforms from the south side of the railway is very poor, in particular for disabled persons or young families with buggies, prams etc. The public roadway that currently serves the drop-off point only, as there is no parking on the south side, is almost a single track road which passes under the railway from the main road and vehicles require to negotiate a sharp blind bend as they pass underneath the bridge. If passengers were to be travelling south on this line, they would have to walk over the footbridge which has no ramps, therefore buggies, prams etc. would have to be carried. If proposals for this development were to go ahead, work to drastically improve this area would require to be carried out prior to any building works taking place. Existing parking problems and overcrowding on the trains are already outlined above.

With regard to the North Berwick rail line improvements, these are required NOW in order to deal with current demand as well as the future demand as the LDP developments come on stream. The Community Council has pointed this out on several previous occasions in other correspondence.

It is questionable whether a new railway station at Blindwells can be justified as it would only be just over one mile from the existing station at Prestonpans. It would lead to extended overall journey times and could potentially cause pathing problems for other East Coast Main Line (ECML) Services. An alternative to a new station would be a dedicated bus feeder service from Blindwells direct to Prestonpans station timed to meet, at the minimum, all the morning and evening arriving and departing peak hour services. A combined bus/train ticket should be introduced to make the service as attractive as possible and reduce delays in buying multiple tickets for travel.

The Rail Delivery Group has recently published a document outlining potential improvements to the Scottish network from 2019 onwards (Investing in the Future – Choices for Scotland's Railways 2019 and beyond, September 2016:

<http://www.raildeliverygroup.com/about-us/publications.html?task=file.download&id=469762881>).

It suggests four options for improvements to the ECML through East Lothian and into Edinburgh Waverley:

- Prestonpans to Drem four tracking;
- Edinburgh Waverley platform enhancements;
- Edinburgh Waverley eastern approach enhancements; and
- Dynamic loops south of Drem.

Once a decision is made on these proposals, it may then be possible to revisit the proposal for a station at Blindwells.

The Community Council will respond in more detail at the appropriate time to transport proposals linked to developments within its area.

The main line of the A1 appears to cope with the increase in traffic due to the LDP. However, the Community Council is concerned about the consequences of an incident occurring that requires closure of the A1. Traffic would have to be diverted onto the local road network and this has the potential to cause major congestion albeit for only a relatively short time. This should be factored into any decisions made on improvements to the A1.

In connection with roadworks taking place on the A1 at present to further improve safety on the A1 at Bankton, it has been reported that there are already 24,000 vehicles per day using the stretch of the A1 road between the Gladsmuir and Dolphingstone junctions, therefore further building works in Longniddry and the surrounding areas are going to put further pressure on our already overcrowded road network.

As a Community Council, we are also concerned that the construction of dwellings at various locations to the east of Longniddry could generate a larger volume of traffic, particularly at peak hours, which will converge at the roundabout adjacent to the railway station where the A198 and B1377 meet, creating a 'rat run' by drivers wishing to bypass the already congested A1. There is also the potential for traffic travelling on the B1348 (coast road) to migrate to the A198 via the B1377 (Lyars Road) in an attempt to travel on the smaller 'B' roads, creating congestion within Longniddry itself. This would also result in a greater danger to pedestrians both in the main part of the village and at the railway station as they attempt to cross these main roads to reach bus stops, etc. This is of particular worry as there are a greater number of heavy vehicles now using the route through Longniddry and there have already been accidents where parked cars have been damaged.

School Bus Service

Pupils from Longniddry who attend Preston Lodge High School in Prestonpans are obliged to catch the school bus on the eastbound side of the A198 in the morning following a serious incident a number of years ago. This is to ensure that pupils do not have to cross the A198 to reach a bus stop. The buses then travel eastwards to the roundabout at the station to turn and head to Prestonpans. In the evening they are dropped off on the eastbound side and so do not have to cross the A198 at all.

Pupils living in the central and eastern parts of the new development can access the bus stop at the Inn by using the Argyll underpass and relocated pelican crossing or the station by using the station footbridge. However, pupils (and other bus users) living at the western edge of the development are likely to walk along the B6363 to access the A198 at Lorne Bridge and will then have to decide which of the bus stops at the Inn or Cunningham Court to use.

Unless an exception is made for the pupils from the new development, they will have to cross the A198 to board the school bus in the morning and again in the evening to return home as the development is on the opposite of the A198 to rest of Longniddry. Consideration should be given to allowing them to access buses on the westbound side of the A198 in the morning and turning buses at the roundabout to drop them on the westbound side in the evening.

Concerns re the Proposed Longniddry Development

It is of deep concern that this proposed development would take place on agricultural land, which is presently being used for crops, and not in any way lying fallow. General opinion appears to be that there would be reluctant approval for the Longniddry Farm Steading itself being upgraded and developed as a small expansion which would be more conducive to the existing village. It is generally felt that the proposal for at least 450 houses on the south side of the railway line is just too large and will split the village into two parts.

There is also apprehension that the proposed housing development would proceed first without any community features such as shops, drop-in centre, play areas etc., leading to concerns that after the housing is built, these facilities would then fail to be constructed. In respect of the proposed new football pitch and cycle pathways etc. there is no indication as to who will be responsible for providing these various elements or who would be providing the upkeep after their construction.

The proposed development seems to be very tight in design with the developers having planned to maximise the housing potential on a smaller site. To be in-keeping with the existing village of Longniddry, if this development is allowed to proceed, would it not be better to have less housing on the site in order to create a more spacious and pleasing development as stipulated by Wemyss & March when Longniddry was originally extended? ? After the last expansion of Longniddry, the

Glassel Park Association was formed to have responsibility for looking after the green spaces, trees, etc. and all residents pay an annual fee towards this. It is not clear if there is a similar system proposed for the new development.

Sports Facilities

In the local development plan for Longniddry the plan indicates that a full size football pitch will be included in the proposed development as the open space requirement that is stated in Council regulations. The village already has a football pitch with changing and storage facilities that serves the local football team – Longniddry Villa – very well so would it not be more beneficial to the community to provide an all-weather multipurpose pitch, preferably 3G or 4G that could be used by a variety of groups and not just exclusively for football. This would involve less maintenance and can also be used for other sports. If however, grass was the only option, then consideration should be given as to the upkeep of this as it is thought that East Lothian Council would not be able to undertake such a task.

The developer, from what we believe is keen to encourage integration of the new development with the existing village, so surely it would be better to encourage the new influx of residents to use the existing facility and conversely to encourage the existing residents of Longniddry to use a new facility that at present is not available in the village. The plan importantly does not include any provision for changing facilities so does the developer expect anyone using this new pitch to use the existing changing pavilion in the village, then walk to the new pitch, which would require all the players/participants to cross the main road through Longniddry to access the new pitch.

From examining proposed plans for other areas in East Lothian it does not specify in those that open space should include a specific facility but only states that open space should be provided according to Council's open space standards. We therefore think that the developer should look at this again and take on board the comments that we have made and perhaps reconsider their existing plans.

Affordable Housing Quota & Tenure Mix

Scottish Planning Policy (SPP), 2014, SPP defines affordable housing as:

“Housing of reasonable quality that is affordable to people on modest incomes. In some places the market may be able to meet most affordable housing needs but this will not be the case everywhere. Affordable housing may be provided in the form of social rented accommodation; mid-market rented accommodation; shared ownership housing; shared equity housing; housing sold at a discount (including plots for self-build) and low-cost housing without subsidy” (SPP 2014).

SPP states that where the Housing Need and Demand Assessment (HNDA) and Local Housing Strategy (LHS) identify a shortage of affordable housing, it should be addressed in the LDP as part of the housing land allocation. Now the HNDA shows that 33% of total housing supply in East Lothian should be for affordable housing and in the short term it could be as high as 41%.

Since Right to Buy legislation was brought in by the Westminster Government in the 1980's East Lothian has lost a massive proportion of its Council Housing stock. With 4,000 families on the waiting list and an annual turnover of circa 400 units it is obvious that we have a major problem in East Lothian. A major concern in the definition of affordable housing for new developments (market housing sites) is that a developer may use selling price as the criterion, i.e. they may build some small units with a lower than average market value.

We feel there is an undeniable need for affordable rented housing in the area; there are very few council houses left in the Longniddry area – most have been bought at discount. In the Longniddry area there is a shortage in the sales market of single level homes – bungalow type, for older residents. There is also a shortage of single occupancy homes for older residents and also for youngsters.

We would certainly be in opposition to the concept of the ELC securing a financial contribution in the form of a commuted sum for delivery of affordable housing elsewhere.

We would be strongly in favour of affordable housing being integrated into the development i.e. not being restricted to one area.

Education

There isn't really any significant comment that can be offered with regards to the proposals around educational provision as the numbers within the table in Technical Note 14 (p43) in relation to Longniddry Primary are wrongly aligned and therefore any calculations aren't able to be undertaken. There may be implications around increases to average class sizes etc., but it is unclear as to what this may amount to. Similarly, the notes also indicate that the school building currently has 10 classrooms (8 are used for classes, 2 are other learning spaces) and that the planned development of the building will add 2 classrooms. However, the noted number of classes is then 14, a figure which appears to be wrong.

The allocation of around 450 houses at Longniddry South within the SESPlan also brings additional concerns. Taking the figures of projected school rolls into account, the document would seem to indicate that it is the expectation that a figure of circa 150 extra children will be commuting to the existing school building each day, either on foot (which is the preferred choice) or by car. This has significant implications for the streets immediately surrounding the school in terms of children being transported and in terms of ensuring appropriate provision is made for safer road crossing.

Following on from the above, it should be noted that the primary school is situated in the main village of Longniddry and there are fears for the safety of pupils who choose to walk or cycle to school as they will require to cross over what will be a busy main road that runs through the village. As a result, there are also fears that many parents will not allow their children to walk or cycle to school and will therefore use their vehicles to drive them to school which will cause parking and congestion problems around the school area, thus causing a major safety issue.

There are also fears that the capacity of Preston Lodge High School will be inadequate if planning permission goes ahead, particularly in view of the fact that houses are still in the process of being constructed in the Prestonpans area, which is certain to have an impact on the number of pupils attending the school.

Health Facilities

At present, the provision of local healthcare within Longniddry is through the Harbours Medical Practice in Cockenzie and its local satellite surgery within the village. There is a planned extension to the site in Cockenzie, which will add an additional 3 clinical treatment rooms. However, there are no plans in place to enhance the provision within the village of Longniddry, despite an additional 450 homes being developed within the area. The current provision within the village is minimal, and anecdotal evidence from residents will highlight the challenges that it faces in terms of space and privacy. Within the SESPlan, there is no mention made of any compulsion on the part of any developers to support the development of the Longniddry surgery. This facility is being stretched to

breaking point at the present time with the existing population, bearing in mind that new housing presently under construction in Cockenzie will also impact on this service.

Utilities

Concerns have been raised as to the suitability of existing water and sewage services within Longniddry and as to how they will cope with the extra burden of hundreds of houses being built. There is also the question as to how the water table will be affected and as to how this will perhaps affect the streams that already run through Longniddry down to the shore.

There is a very small telephone exchange within the village providing telephone and broadband services however some residents are still not experiencing the superfast broadband speeds that have been advertised. We are unsure as to how the existing exchange would cope with the number of dwellings proposed in the Longniddry development.

With regards to electricity provision, there are many more 'outages' that occur to the east side of the village (where the new development would be situated) compared to the western side. We are unsure as to whether or not this would affect any new housing, or if the installation of new electric cables to any new development would impact on the existing houses and cause even more 'outages' than they experience at present.

I would appreciate these above points all being taken into consideration during the finalisation of the Local Development Plan.

Please acknowledge receipt of this letter.

Yours sincerely

David Rose
Chairman

From:
To: [Local Development Plan](#)
Subject: Development of land at Glebe Field, Whitekirk (PROP OS5)
Date: 31 October 2016 20:08:00

Dear Sirs,

I write with reference to the above proposal.

I have the following comments regarding the proposal -

1. The area of land proposed for the development of the graveyard is completely disproportionate to present requirements. Given present rates of burial at Whitekirk, the area of the development represents approximately 500 years of future burial requirements.
2. The location of the proposed graveyard development is dislocated from the Church and present graveyard. It would seem more appropriate to site a new graveyard in a position more adjacent to the Church. I appreciate there may be issues with the rocky nature of the ground behind the present graveyard but an extension of the present graveyard along the A198 would appear more appropriate.
3. There appears to be little demand within Whitekirk for an extension of the current graveyard. The more favoured option is the continued use and expansion of the burial facility in the Binning Wood.

Kind regards

Nick Swan

From:
To: [Local Development Plan](#)
Subject: Objection to Local Development Plan
Date: 31 October 2016 21:48:05

Dear Sir/Madam,

We would like to object to the Local Development Plan (LDP) which has allocated four potential development sites to Gullane village. We firmly believe that if all of these developments were to go ahead it would be an unsustainable expansion of the village and potentially be a serious concern for the safety of the roads around Gullane and the surrounding villages.

We acknowledge the need for further housing across Scotland, the latest statistic of 150,000 people waiting for housing is truly shocking for a prosperous country such as Scotland. In this regard we believe that Gullane should play its part in providing extra housing. We view the potential development of the Old Fire College site, which could provide 125 homes, as sensible and beneficial to both Gullane and increasing the availability of housing in the area.

However we must strongly object to the potential development of the three greenfield sites around Gullane's south-eastern edge (Saltcoats NK7, Fenton Gait East NK8 and Fenton Gait South NK9) as these would prove to be unsustainable, the key factor in any development plan. There are a number of reasons why these are unsustainable, ranging from the local primary school (the extra two classrooms suggested for 344 new homes is concerningly inadequate) to the medical centre and other local amenities. You will no doubt receive several objections on these from other residents. We would like to focus our objection on the road network.

The A198 is a road which is unsuitable to heavy traffic. The stretches of road from Aberlady to Gullane and Longniddry to Aberlady are full of tight bends and blind spots. The road already suffers from a range of issues. To name but a few: motorcyclists viewing it as a racetrack, nervous drivers going dangerously slowly leading to frustration and dangerous overtaking from other drivers. On this note, we have seen several incidents of overconfident drivers going too quickly & overtaking at the blind spots on the road. Indeed the concern of cars overtaking dangerously is often made worse by large groups of cyclists taking over the whole of one side of the road. We have lost count of the number of times that the walls at Luffness & Gosford have needed to be repaired due to a car crashing into them.

If 344 new houses were to be built in Gullane this could equate to approximately 593 more cars on this road (using the most recent development in Muirfield Grove, Gullane as a guide). Indeed, in reality this figure will be materially higher once the other developments along the coastal villages are taken into account. To our minds this seems completely unsustainable for the road we have described above. We implore the council to reconsider the Local Development Plan (LDP) and remove the three greenfield sites (Saltcoats NK7, Fenton Gait East NK8, Fenton Gait South NK9) from the proposed LDP. Removing these sites from the plan would at least give the A198 (and the other smaller roads such as the C111 at West Fenton and Muirfield Riding Therapy) a chance of not becoming seriously dangerous and would hopefully keep the area as one that is sustainable.

Yours sincerely,

Duncan & Julia Sutherland

From:
To: [Local Development Plan](#)
Subject: LOCAL DEVELOPMENT PLAN
Date: 31 October 2016 23:25:09

I was notified of PROP NK3. I was surprised as the development is complete.

Other allocations in North Berwick have been commenced and therefore the emerging LDP seems to of limited merit as it does not identify land for future development but simply a series of existing consents. Its value is extremely limited.

The planning process is failing to identify land for future development. The system is flawed and backward looking. The process is becoming one determined by appeals and not by forward planning.

The major issue is the complete lack of infrastructure to support the levels of additional housing. The amount of employment land identified is minuscule and all that is being encouraged in the LDP is a commuter belt of even greater proportions. But the road and rail network cannot cope with existing levels of traffic and passengers. In addition, ELC has singularly failed to obtain funding to improve matters. The Council should have safeguarded a North Berwick bypass route and secured money from developers to meet the cost.

A new doctor's surgery is needed in North Berwick. The existing one cannot cope, it has insufficient staff, no parking and is poorly operated. Money has never been secured from developers towards health care. Why not? Everyone moving to East Lothian will require health care yet the emphasis has been on education. This short sighted and a flawed approach especially in areas where the population profile clearly indicates growing demand from the elderly.

The identification of large new housing sites in Gullane is peculiar. Gullane is not a sustainable location. There is no local employment per se. All new residents will have to travel by car. The roads are busy and unsuitable for more traffic, the train service is overworked and cannot cope at present. The two sites at the east end of the village do not work well together and they should be drawn more sensibly so that a brief can be prepared to get a good road layout. The opportunity - if this housing must be built - should be taken to provide a further set of light on the Main Street to the east of the existing set. This would slow traffic into the village.

Aberlady and Dirleton are other village where additional housing will simply serve to increase commuting and school-traffic flows and traffic problems.

The LDP seems to be playing catch-up. It does not represent a forward plan as it should. The planning process is not fit for purpose and needs to be reconsidered. This current document is neither ground breaking nor visionary. It seems to lack a strategic direction.

As a planner with nearly 40 years experience it is deeply depressing that so little progress has been made in providing good policy frameworks and robust development plans.

Kirsty Towler