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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.

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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

From:
To: [Local Development Plan](#)
Cc: [Environment Reception](#)
Subject: East Lothian Council Proposed LDP Representation: North Berwick Cluster - Site at Foreshot Terrace, Dirleton
Date: 31 October 2016 13:58:55
Attachments: [Proposed LDP Submission Text 10-16 Foreshot Terrace 10-16.pdf](#)
[Document 1 - Location Plan.pdf](#)
[Document 2 - Site Layout Plan.pdf](#)
[Document 3 - Dirleton Landscape Appraisal-RevB IWA.pdf](#)
[Document 4 - Landscape Design Statement - IWA.pdf](#)
[DOCUMENT 5 - Site Effectiveness Assessment.pdf](#)

Please find attached a representation on behalf of **Muir Homes Limited**, Muir House, Belleknowes Industrial Estate, Inverkeithing, Fife KY11 1HY related to the inclusion of the identified site at **Foreshot Terrace, Dirleton** for residential development. This comprises a statement outlining the changes sought to the Proposed LDP and 5 related documents as follows: -

Document 1 – Site Location Plan

Document 2 – Indicative Site Layout

Document 3 – Landscape and Visual Appraisal of Development Capacity

Document 4 - Landscape design statement

Document 5 – Site Effectiveness Assessment

Grateful if you could confirm receipt.

Kind Regards

Malcolm Smith

Director

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EAST LOTHIAN COUNCIL PROPOSED LOCAL DEVELOPMENT PLAN

REPRESENTATION ON BEHALF OF MUIR HOMES LIMITED

CHANGES TO PROPOSED LDP BEING SOUGHT

- **The subject site at Foreshot Terrace, Dirleton (refer Document 1) should be allocated in the Local Development Plan for residential development (24 units);**
- **The Dirleton Village boundary should be amended in order to include the subject site at Foreshot Terrace, Dirleton (refer Document 1); and**
- **The Foreshot Terrace site should be excluded from the area impacted by the proposed Countryside Around Towns Policy (Policy DC8).**

SUPPORTING CASE

1.0 Background

1.1 It is a key requirement of National Planning Policy (NPF3 and Scottish Planning Policy (SPP)) that, in addition to the delivery of development to meet the social and economic needs of communities, appropriate safeguards are put into place in order to protect the integrity/character of place and the overall value of the historic environment. Against a background of the need to provide for more homes in accordance with SESplan requirements, there is clearly an obligation to ensure that the location and form of new development is appropriate and that the site selection process and related impacts are fully assessed and understood otherwise the credibility and confidence in the LDP is undermined.

1.2 The Policy principles set out in SPP include protection of the historic environment, including preventing development which would have a negative impact on scheduled monuments and listed buildings and their settings. NPF3 recognises the contribution made by our cultural heritage to our economy, cultural identity and quality of life and confirms the positive role the planning system has to play in maintaining the distinctive and irreplaceable historic places which contribute to our sense of identity and are an important tourist resource. An underlying Policy Principle of SPP is the care of the historic environment including the settings of valued structures and ensuring (as per the primary legislation) that development in Conservation Areas preserves or enhances the character or appearance of such areas.

1.3 The LDP correctly identifies the need, in conjunction with the compact growth strategy, to provide for new development within the eastern parts of the LDP area, such development to be located/delivered in order to ensure related benefits to local

communities and to assist housing delivery targets. The LDP also recognises the need for infrastructure to be available (or be made available) in order to serve new development and the benefits of utilising existing capacity where possible.

1.4 The LDP's stated "*Vision, Aims, Objectives and Outcomes*" include: -

- To meet economic and housing land requirements in appropriate marketable locations so new housing, including affordable housing, and opportunities for economic growth and job creation can be delivered;
- To ensure that new development respects the character, appearance and amenity of the area, including its settlements and their settings; and
- To ensure that the design of new development reflects the sense of place and identity of the local area, and is properly integrated with its surroundings in terms of movement as well as form, appearance and use of materials, while contributing to wider sustainability and place making objectives.

2.0 The LDP Main Issues Report (MIR) Stage

2.1 The site selection process underpinning the Proposed LDP emerged at/following the MIR stage. To inform site selection, East Lothian Council produced a detailed "Interim Environmental Report" (IER), Appendix 9 of which related to the North Berwick area (including Dirleton). The IER indicated that it provides "*... an objective assessment of the planning merits...of potential development sites submitted for consideration as part of the LDP process*". The IER further states that "*To help inform the MIR a comprehensive assessment of all sites has been carried out. All sites were assessed in the same way ... to assess how suitable a site may be for development.*" In short, detailed site assessment was carried out in order to identify the most appropriate sites for development, this then being reflected (in theory) in the MIR.

2.2 The MIR identified a preferred development site at Castlemains, Dirleton (PREF-N4), this now being PROP NK11 which is the subject of a separate representation by Muir Homes to the Proposed LDP, and a reasonable alternative at Foreshot Terrace (ALT-N3) which is the subject of this representation. For the reasons outlined in Muir Home's PROP NK11 representation, the allocation of that site (Castlemains) has not been justified and it remains a constrained site with a range of potentially negative impacts on Dirleton and its setting, including the setting of the listed building and scheduled monument forming Dirleton Castle. This position is at odds with established planning policy at all levels including the emerging Plan's stated "*Vision, Aims, Objectives and Outcomes*" (refer paragraph 1.4 above) and Cultural Heritage policies (CH1, CH2 and CH4). The Foreshot Terrace site assessment raised no issues of concern to either Historic Environment Scotland or Scottish Natural Heritage with respect to the impact of development on the castle, the setting of the village or the Conservation Area. It remains unclear why the Castlemains site is the Council's preferred option?

3.0 Dirleton

3.1 The merits of further development in the village of Dirleton have been noted through the LDP process. Dirleton, a village of around 500 - 550 residents lying on the A198 between North Berwick and Gullane, contains a Primary School (with available capacity), a church with hall, 2 licensed eateries, a bowling green/club, and visitor attractions (Dirleton Castle, Yellowcraigs beach and Caravan Park). Within close proximity to the village is North Berwick (including a range of commercial facilities and the closest rail station) circa 2.5 miles, with the Archerfield Estate and the array of leisure facilities (including 2 golf courses) also very close to the village. In short, Dirleton retains a range of local facilities (which would benefit from additional patronage) and is readily accessible to a wide range of commercial, leisure, transport, employment and community facilities within the local area. The designated Conservation Area, dominated by the Castle (listed building and scheduled monument) and the Green, is a potential constraint to development but, as with development in most Conservation Areas, it will be the location, scale and form of development that will ultimately determine the appropriateness of new development.

3.2 The issue to be addressed in the village is the location, scale and form of new development that should be supported. It is considered that the basis for this is informed by a detailed "Landscape and Visual Appraisal of Development Capacity" carried out by Ian White Associated Landscape Architects (Document 3 refers). Of the 3 main sites assessed in this document it is clear that the site at Foreshot Terrace would result in most benefits to and least impacts on the village. These conclusions appear to reinforce the lack of concern related to the development of the Foreshot Terrace site from Historic Environment Scotland and Scottish Natural Heritage and is in sharp contrast to the impacts on the setting of the village and on Dirleton Castle arising from potential development at Castlemains (PROP NK11).

4.0 The Foreshot Terrace Site (Document 1 refers)

4.1 The site lies within the eastern part of Dirleton. It forms part of a larger area of agricultural land within the Dirleton Conservation Area and is physically contained on 3 boundaries by the existing village. The present boundaries comprise: -

- *North*: agricultural land;
- *South*: a linear tree belt circa 10 metres deep beyond which is Main Road/Dirleton Road (Foreshot Terrace);
- *East*: existing built development save a small section to the north at Ware Road; and
- *West*: existing built development and avenue trees

4.2 There are a range of property types (age and style) in the immediately adjacent area albeit the most notable physical/visual feature in the area is the 10 metre frontage tree belt along the southern site boundary which provides an attractive setting for the

site and partially screens it from the public realm. This feature would be retained/enhanced/managed as part of the development in order to ensure its longevity and contribution to the Conservation Area going forward.

4.3 Over time a range of proposals have been looked at for The Foreshot Terrace site. In light of the on-going housing delivery failures in the East Lothian Council area, a detailed planning application for the site has now been submitted. The application followed a period of detailed community consultation with significant alterations to the number of units, layout and house-types emerging from this extended process. The emerging development proposals comprise 24 new homes, 25% of which (6 units) would be for affordable housing. Bespoke house types have been designed for the site in order to deliver a high quality of development, to meet community needs, and to complement the site, the surroundings, the village, and the designed Conservation Area. The single, 1¾, and two storey bespoke houses being proposed are designed to provide a range of property sizes, from 2 to 5 bedrooomed in order to meet a wide range of needs, and are arranged in an attractive layout and set within the existing woodland environment provided by the Foreshot Terrace trees (which would be retained and managed) and adjacent trees, enhanced by new woodland planting.

4.4 The existing setting of the site/development would be further enhanced by new planting on the north, east and west boundaries of the site, this including the 30 metre woodland planting on the north site boundary (as requested as part of the community consultation). New planting within the development, including hedge planting on the property frontages, is designed to further soften and integrate the development, to reflect the local character, and to complement the proposed design solution. New planting to the east and west boundaries (as requested by attendees at the community event) is included to further separate and assist screening between properties. The proposal also includes a significant area of landscaped open space (Village Green) at the core of the development, this area being overlooked on all sides thereby maximising its amenity contribution and providing natural surveillance.

4.5 The main site access would be formed from Ware Road with a separate pedestrian/cycle link also being provided directly to Foreshot Terrace (close to the bus stops). The widening of the section of Ware Road to the site access, improvements to its junction with Main Road/Foreshot Terrace, and a new footpath on Ware Road is also proposed as part of the development (works agreed with East Lothian Council's Transportation Service). Access and integration issues are therefore fully addressed.

4.6 The site assessment/current proposals have been informed by a range of supporting documents including: -

- A site investigation report;
- An Ecological assessment;
- An Arboricultural assessment and report;
- A Transport Assessment;

- A Drainage assessment (including Sustainable Urban Drainage proposals);
- A Design and Access Statement; and
- Landscape design statement (Document 4)

Note: these documents, other than the Landscape design statement, have not been produced for brevity. If required these can be made available.

4.7 The conclusions from Landscape Design Statement (Document 4) confirm, with respect to the Foreshot Terrace site, that: -

“The proposed site is well-located off the principal street of Dirleton (Dirleton Road/Foreshot Terrace). Being relatively low lying, flat land, it is favourable for building. Development would be set behind the existing mature trees and over 1.50m lower than Foreshot Terrace, and thus of limited visibility and scale viewed from the main street. It is strongly contained along east, south and west boundaries by existing mature trees, houses and boundary walls/hedges. Visibility from open countryside to the north is limited by flanking buildings, boundaries and mature trees. The proposed landscape scheme will establish a strong new structure of planting and habitats that help integrate the development and provide for its residents and natural habitats. The proposed development would not adversely impact on the character of the conservation area”.

4.8 Pre-application consultation also occurred with East Lothian Council (ELC) service departments and the only issue of concern raised was related to the capacity at Dirleton Primary School. In responding, ELC’s Education Service confirmed that capacity would be a constraint when the demand from the development was considered in addition to the proposed allocation of 30 units at Castlemains (PROP NK11) and was not a reflection of the ability of the school to accommodate the 24 units at Foreshot Terrace. It should be noted that East Lothian Council’s Education Service has already accepted that a phased residential development of 34 units could be accommodated within the school. There is therefore primary school capacity for the proposed 24 unit development at Foreshot Terrace with a financial contribution (as with all development in the catchment) required towards the extension to North Berwick High School. **Education capacity is not a constraint to the development of this site.**

5.0 CONCLUSIONS

5.1 Dirleton is clearly a village that would benefit from and which has the capacity to accommodate new residential development in support of the SESplan housing requirements and in accordance with SESplan Policy 7. It is a highly marketable area. The Foreshot Terrace site is clearly that best suited to delivering a sympathetic and characteristic development within Dirleton with no material impact on the setting of the Castle or the village from the main arterial route (A198), and being sympathetic to the Conservation Area and integrated with its surroundings. The development would also deliver a robust and defensible long term boundary to this part of the village by enhancing its woodland edge.

5.2 While not presently the LDP's preferred location in Dirleton there appear an array of issues related to the presently preferred site at Castlemains (PROP NK11) that cannot be resolved in a manner supportive of the village and its character/appearance. In effect, the prominent nature of the Castlemains site and any development thereon would adversely affect the setting of Dirleton village, Dirleton Castle and Dirleton Conservation Area and therefore would be contrary to SPP, the Scottish Historic Environment Policy and to the underlying requirements of the emerging LDP.

5.3 The alternative site at Foreshot Terrace offers the opportunity to deliver a fully integrated development of quality complementary to the Conservation Area and with no adverse impact on Dirleton Castle or its setting, or the setting of the village. This site would represent an infill location within established development being well contained/defined on 3 sides with positive provision for a clearly defined landscape edge on the fourth side (North) to define the long term boundary of Dirleton.

5.4 For all of the reasons outlined above, it is considered that the Foreshot Terrace site would positively address the Plan's stated "*Vision, Aims, Objectives and Outcomes*" (paragraph 1.4 refers) by: -

- Delivering housing, including affordable housing, in a marketable location;
- Delivering a scale/form of development which respects the character, appearance and amenity of the area, including the setting of Dirleton; and
- Providing a design that reflects the sense of place and identity of the local area, and is properly integrated with its surroundings in terms of movement as well as form, appearance and use of materials, while contributing to wider sustainability and place making objectives.

5.5 In addition, no conflict with the terms of the emerging LDP's Cultural Heritage Policies (CH1, CH2, and CH4) would arise.

5.6 Development of the Foreshot Terrace site appears the most appropriate option for the village and its setting/character while also delivering beneficial development in support of the underlying strategic and local development plan strategies. The development is fully deliverable (Document 5 refers).

DOCUMENTS

Document 1 – Site Location Plan

Document 2 – Indicative Site Layout

Document 3 – Landscape and Visual Appraisal of Development Capacity

Document 4 - Landscape design statement

Document 5 – Site Effectiveness Assessment



Muir Homes

Dirleton

Landscape & Visual Appraisal of Development Capacity

This report has been prepared by Ian White Associates Landscape Architects.

Author : Nick Bowen CMLI
Date: February 2016

Revision A : April 2016
Revision B : June 2016
Revision C : October 2016

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Introduction

The aim of this report is to appraise the suitability of three sites at Dirleton to accommodate new housing development. The landscape character, qualities and capacity to absorb new development of each site have then been appraised through desk and field study.

Location

Dirleton is a village in East Lothian, approximately 32 km east of Edinburgh off the A198 on the B1345. It lies between North Berwick (4km east) and Gullane (3.5km west). The coast of the Firth of Forth is approximately 2km to the north.

Dirleton is set on and around the rocky outcrops of Dirleton Castle and Chapelhill, within open generally gently sloping arable land, abutting the wooded estate landscape of Archerfield.

Regional Landscape Character

The Lothians Landscape Character Assessment published by SNH (1998; Ash Consulting Group) describes this locality as lying within the Coastal Margins - North Berwick Plain, which has the following characteristics:

Due to the subdued topography of the area the character of this coastal plain extends well inland. From the coast the plain is virtually flat, consisting of raised beach deposits, gradually giving way to gentle undulations towards the south. Within most of the area views across the sea are common, emphasising the open, level nature of the coastal plain. The only significant interruption of this to the plain is the dominant North Berwick Law (187m) - a site of great archaeological importance, which is echoed in the distinctive profiles of the Bass Rock and Craigeith in the Forth. There is a diverse range of scenery and habitats along the coast. The crags and rocky outcrops which form much of the coastal edge enclose numerous small sandy coves backed by dunes, which become beaches of a greater extent at Aberlady and Gullane. Golf courses, footpaths, car-parks, and caravan and picnic sites lie along the coast.

The hummocky terrain, short grasses and sandy soil of the East Lothian linksland represent ideal conditions for golf. Courses across the coastal plain form distinctive elements in the landscape, and their historic significance in the development of the game is recognised throughout the world.

The links and dune systems are also of nature conservation value and carry scattered scrub of gorse and sea buckthorn.

The land use across the area is dominantly arable with expanses of agricultural land sweeping smoothly across the plain. These fields are divided into a distinctive large-scale network of fields and are broken by bordering hedgerows or occasional stone walls and fences. The few burns which flow across the plain have been straightened and often incorporated into the field pattern.

The area is also particularly rich in major policy woodlands. The proximity to the coast has resulted in areas of distinctive wind-shorn and sculpted woodland. Small tree clumps, shelterbelts and a scattering of hedgerow trees throughout the farmland assist further in the provision of a degree of shelter.

Settlement is concentrated mainly along the coastal fringe, where a number of highly attractive and distinctive small towns and villages are strung out along the A198 including; Longniddry, Aberlady, Dirleton, Gullane and North Berwick. Further inland, a network of often near-straight minor roads links numerous cottages and large farmsteads. Many of the older buildings are constructed of red sandstone rubble and pantiled roofs.

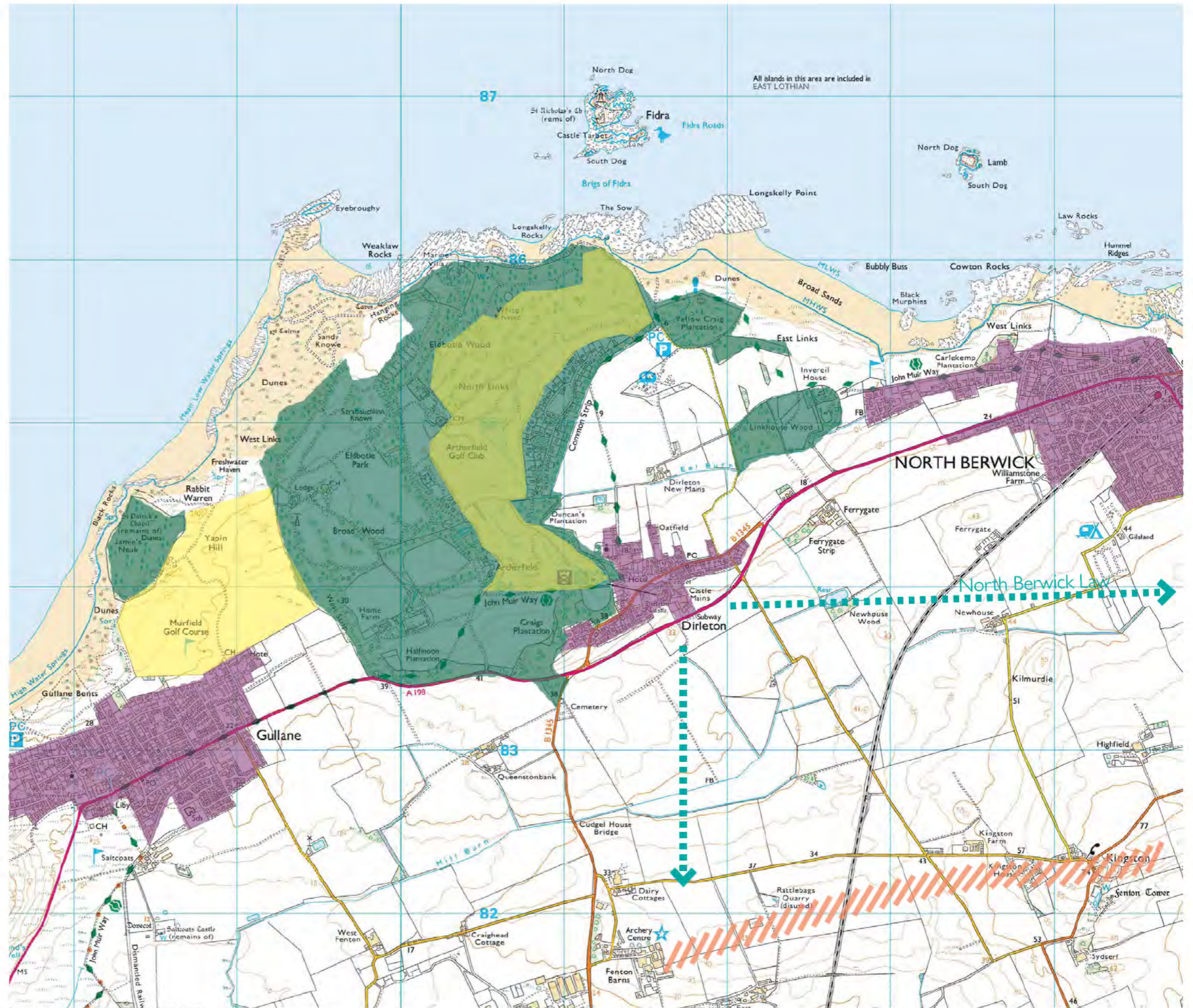
The fertile swathes of crops combine with extensive estate woodlands, locally distinctive villages, farmsteads and mansions, and a varied coastline to create a highly attractive landscape of great diversity.

The SNH report identifies the following pressures on the landscape in this character area:

- High visual sensitivity of immediate coastal zone;
- Potential visitor pressure from successful tourism and recreation industry;
- Pressure for residential expansion of coastal settlements.

It concludes with a number of guidelines for maintaining the integrity of this landscape character area:

- Require careful visual integration of new built developments
- Maintain and reinstate existing hedgerows and trees
- Seek to secure long-term management of key estate landscape features
- Promote integrated coastal zone management strategy including visitor management, tourism, recreation and other developments
- Encourage limited increase in farm woodlands to integrate recent expansion of buildings
- Preserve character of minor road network and its linkage to field pattern



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Local Landscape Character

The B1345/ Main Road forms the spine of Dirleton and was the main road between Gullane and North Berwick before the bypass A198 was built in 1975. The B1345 rejoins the A198 after passing through the village.

The south-western edge of Dirleton, where the B1345 leaves the A198, opens onto agricultural land to the south, affording extensive views which include North Berwick Law dominant over the relatively flat landscape. After rising to enter the village, the road descends the street past mature woodland lying on the north side, passing the school. The green character of the village is apparent, with lawns bordering the side of the road; cottages and houses along with the primary school are a mix of stone and harled buildings, the older buildings lining the street.

After passing Manse Road, a large triangular green is entered, bordered by houses and two inns on the north and west sides and by Dirleton Castle on the south. A line of mature trees define the north of the green whilst the impressive stone wall of the castle grounds mark the south of the green; beyond this wall many large trees form a strong backdrop to the green. The castle itself is largely hidden, with only the tops of the gables visible from here.

Within the village there is a rich composition of houses with gardens and open greens. Garden boundaries are varied and attractive. Stone walls rather than hedgerows are prominent features of the village. There is permeability of views through extensive mature trees and gardens that allow glimpses to the buildings beyond, whilst presenting a strong frontage onto the street and green. Most buildings are of small scale, although there are exceptions including the church, the castle, Oatfield House, Dirleton House and the Red House, built to house Estate workers. The two inns (The Open Arms and The Castle Inn) face onto the main green. Materials of buildings in the older part of the village are almost exclusively stone. Roofs tend to be either natural slate or clay pantile.

Passing eastwards beyond the green, Dirleton Road is lined on the south side by single storey 20th century housing of rather uniform character; white rendered walls with some stonework. Larger villas within generous gardens lie on the north side of the road. At Foreshot Terrace a belt of mature lime trees form an impressive feature defining the character of this part of the village.

The approach road to Dirleton from the east has a small woodland on the south side of the road and open agricultural fields on the north. Views northwards are relatively open across the fields, however continuous woodland in the distance prevent views to the coast.





General view from Kingston, south-east of Dirleton

Kingston offers an extensive panoramic view across the coastal plain and the Firth of Forth, extending to the Ochil and Lomond Hills beyond. A large-scale field pattern of mainly arable land, weakly defined by hedgerows and stone walls with few trees. Woodland forms a setting for Dirleton with the bulk of the village sitting below the areas of woodland.

The houses on Gylers Road are very prominent considering their modest size; they appear elevated above the height of Dirleton castle. They form a crude edge of the settlement against the open countryside, appearing to lie beyond the extents of the historic village gathered around the castle.

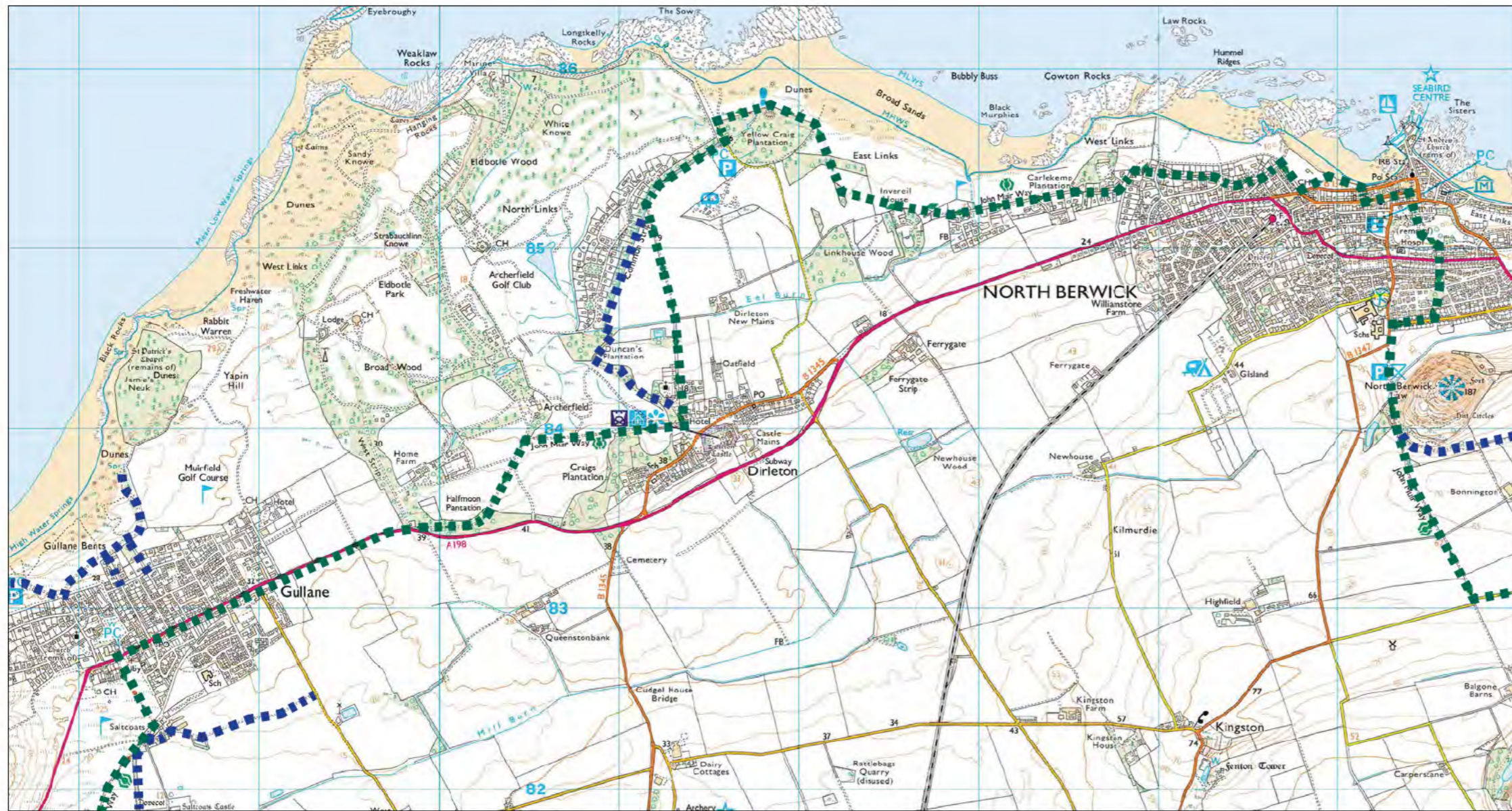
Scattered small scale wind turbines are present south of Dirleton; some larger turbines are visible in Fife.

The Castlemains Place site is visible but set down into the topography, at the lowest visible part of Dirleton. The modest scale of houses on Castlemains Place is apparent.

Core Paths

The local East Lothian core paths network is illustrated below. The green dashed line highlights the John Muir Way.

The John Muir Way stretches 215km between Dunbar and Helensburgh. The route is named after Dunbar-born John Muir, who emigrated to America and became a key figure in the conservation movement and father of the American National Parks.



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Core Path passes north of the village



View towards Dirleton from the John Muir Way

Potential Sites for Development

Three sites for which representations have been made to the Main Issues Report for 20-40 homes have been identified for consideration in this appraisal. All lie within the village of Dirleton and are of open land theoretically suitable for building upon.

1. Field north of Foreshot Terrace
2. Land to the south of Castlemains Place
3. Land to the south of Gylers Road



Field north of Foreshot Terrace

Description

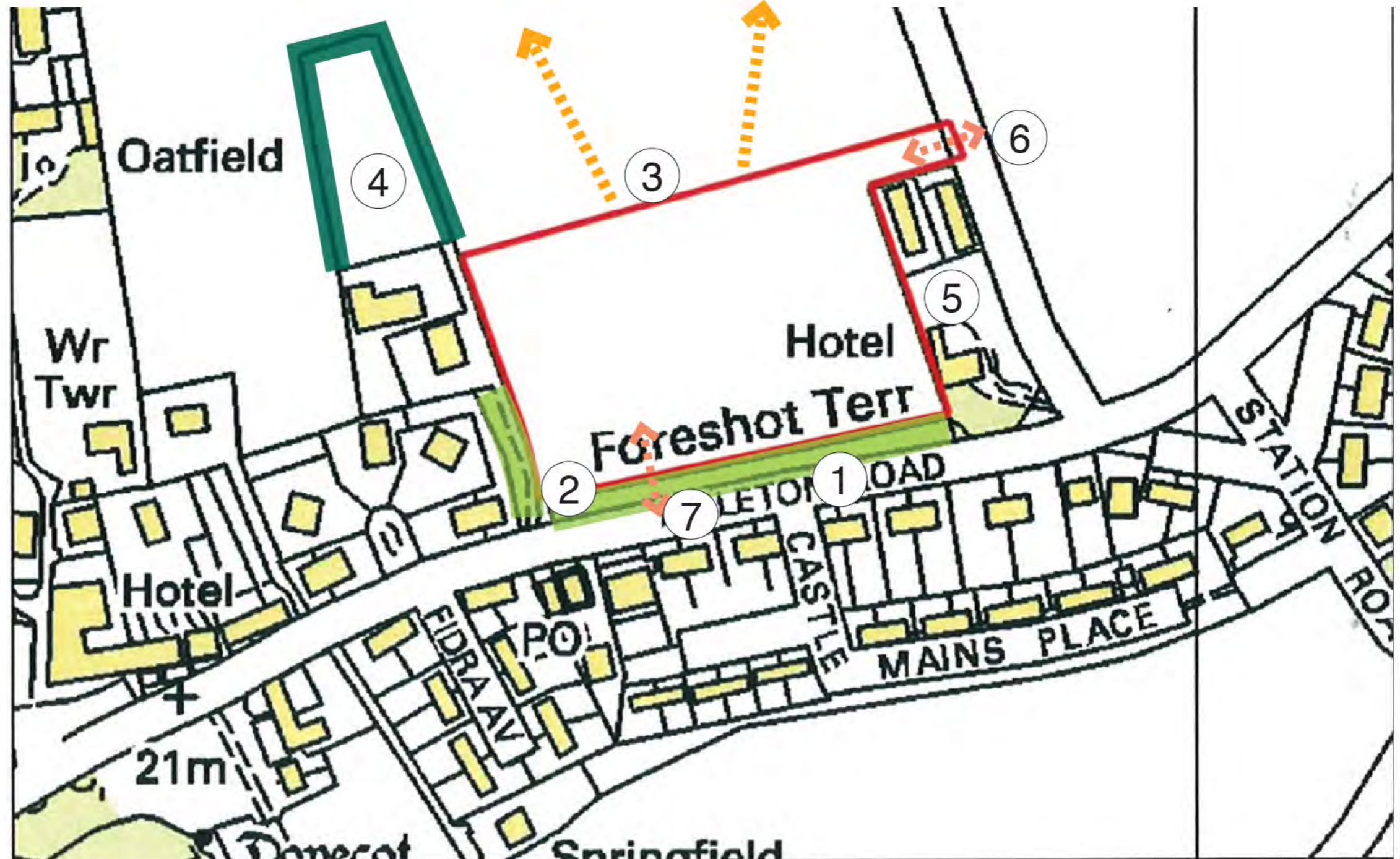
An agricultural, greenfield site, almost flat, with a gradual slope down towards the coast at the north of the site. 1.7 hectares.

Located on the principal route through the village, but lying behind a belt of mature trees and mixed young woodland that bounds the north of Foreshot Terrace. These mature trees give the southern boundary strong definition; predominantly lime with lesser trees of sycamore and ash. The trees are protected under a tree preservation order (TPO), and other mature trees on the western boundary of the field are protected through inclusion within the conservation area. To the north of the site the boundary is currently undefined offering open views to the wider landscape.

1. Dirleton Road/ Foreshot Terrace
2. Row of mature trees protected by a Tree Preservation Order
3. Open views to the north (Coast hidden behind woodland)
4. Speedwell Gardens surrounded by existing Cyprus hedging
5. Cedar Grove C listed building to the east of the site
6. Potential vehicular access off Ware road
7. Potential pedestrian / cycle access at gap in existing mature lime trees.

Appraisal

- +
 - Well located off the principal street of Dirleton (Dirleton Road / Foreshot Terrace)
 - Relatively low lying, flat land, favourable for buildings and roads
 - Development would be set behind the existing mature trees, and thus of limited visibility from the main street. The site lies lower than the street, which would reduce the relative scale of any development
 - Strongly contained along east, south and west boundaries, by existing mature trees, houses and boundary walls/hedges
 - Visibility from open countryside to the north is limited by flanking buildings, boundaries and mature trees
 - Limited impact on conservation area
 - Benefit of mature trees to setting (subject to protection zone)
- - Some visibility from the north (including from the John Muir Way) although this is amongst existing building groupings and pattern of mature vegetation
 - Mature trees on southern boundary prevent road access directly off Dirleton Road
 - Existing trees require a stand-off for root protection and to limit shading of any proposed houses



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Site 1



John Muir Way

Situated on the flat arable land north of Dirleton, the John Muir Way here leads inland from the coastal links, passing through Dirleton and then Archerfield. The visible northern edge of the village is a discontinuous, varied mix of houses, walls, hedgerows, woodland belts and lanes. Dirleton Castle is visible on the skyline, tipping above the mass of mature trees in the heart of the village. The overgrown cypress hedge surrounding Speedwell Gardens is apparent, partially obscuring the Foreshot Terrace site from view.



Lane off Dirleton Road

Looking into the Foreshot Road site. Behind the belt of mature trees at the roadside, this site lies flat and open to the north. The coast lies hidden beyond the woodland belts of Archerfield, which lends the fields north of Dirleton a somewhat isolated character. The logical extent of any development on this site would be drawn between the existing buildings to east and west of it.



Ware Road at the Eel Burn

The farmland north of Dirleton has an austere character, with degraded wall boundaries and weak pattern; there is little structure or habitat. The Foreshot Terrace site is visible with a backdrop of the mature lime trees; the top chimneys of the castle just project above the lime trees. The varied nature of the northern edge of Dirleton is apparent, consisting of pockets of woodland, houses of different aspect, garden walls and tongues of farmland.



Corner of Main Road and Ware Road

This view looking towards the village core highlights the importance of the line of mature lime trees to the streetscape, providing stature that contrasts with the modest and uniform housing of Foreshot Terrace. The low stone wall contributes character, continuing around the C-listed Cedar Grove on the corner. Archerfield woodlands prevent views to the Firth of Forth, but distant hills in Fife are seen above the trees. The Foreshot Terrace site is glimpsed between trees in the garden of Cedar Grove.

Land to the south of Castlemains Place


Description

An open, agricultural, greenfield site of 2.3 hectares in area, dipping northwards from the A198. The site is highly visible from the A198 as there is no existing natural boundary to the road. The northern edge has a beech hedge with regularly spaced trees, and the properties along Castlemains Place behind. Mature hedging runs along the boundary of Station Road. To the west of the site are a significant number of mature trees alongside the lane and in the grounds of Castlemains farm.

The site currently offers open views southwards across the agricultural landscape and south-eastwards towards Berwick Law.

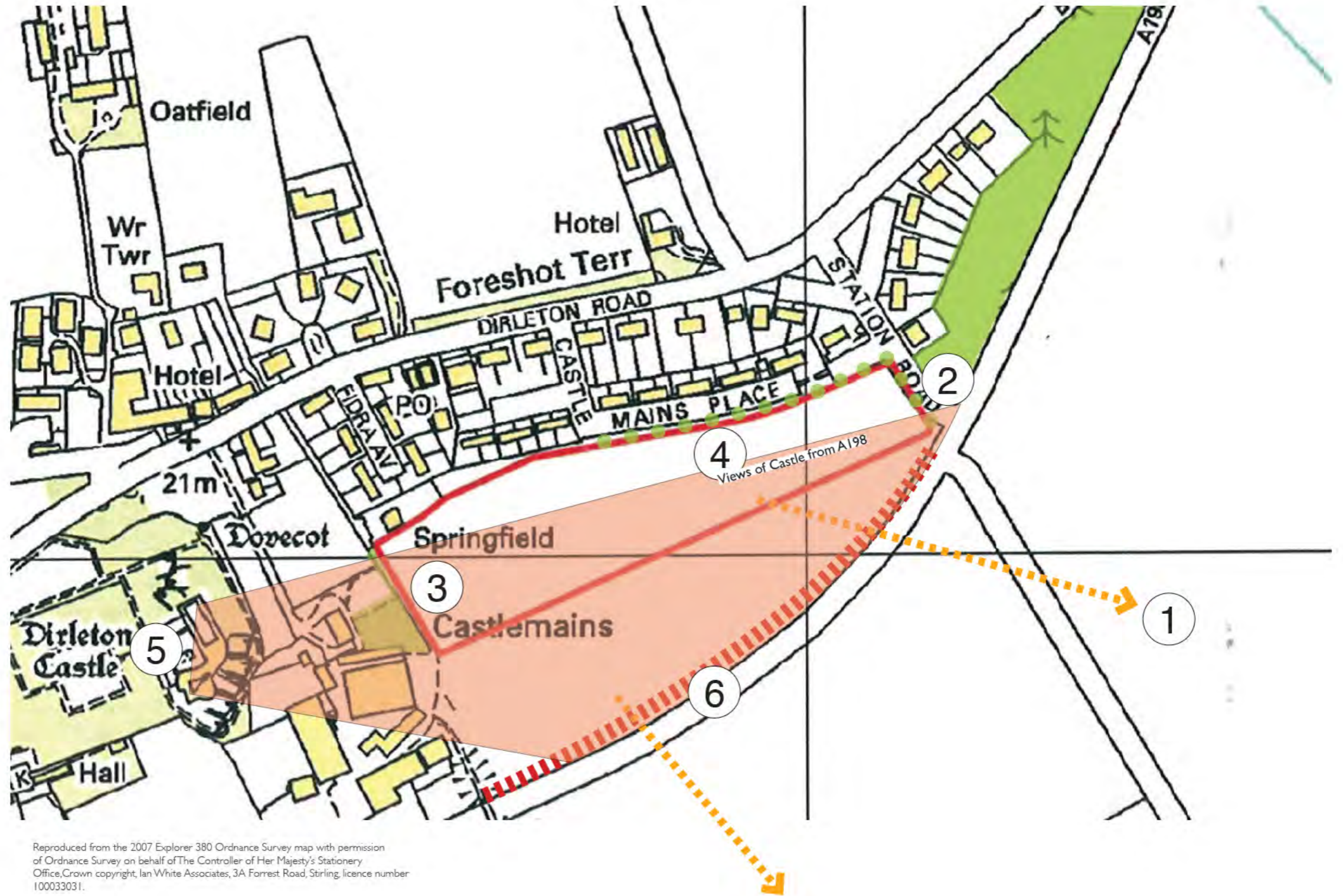
Dirleton Castle lies to the west, beyond Castlemains Farm; it sits on an elevated rocky outcrop and is thus visible from almost the whole of this site and from the adjacent A198.

1. Distant views from the east to Berwick Law.
2. Station Road hedge bounds the east of the site
3. Mature trees along the western boundary
4. Beech hedge and trees along part of northern boundary
5. Dirleton Castle stands on rock outcrop
6. No boundary to the south allows views to and from the A198.

 Views to the castle from the A198

Appraisal

- Topography favourable for buildings and roads
- Hedgerows bound parts of the eastern and northern boundaries
- Mature trees and farm buildings contain the western boundary
- Opportunity to improve boundary of the A198
- Development would change the setting of Dirleton Castle, affecting key views from the A198 as it skirts to the south of the village
- No existing natural boundary to define the southern edge of the site
- Site would be highly visible from the A198 unless significant boundary woodland were planted, which would take years to establish and would then reduce views to the castle.
- Visual and audible impact of the A198.
- Site access from Station Road would remove the existing field hedge.
- Development would impact adversely upon the character of the Conservation Area
- Development would be parallel to the existing grain of the village, rather than engaging with it, thereby making it appear external to the village





Corner of A198 and Station Road

Looking west across the Castlemains Place site, the castle is prominent rising above the village amongst mature trees. The A198 curves to the south of the village without screening or boundary features. Castlemains Place appears low in the landscape, the site sloping gently upwards towards the A198. A beech hedge with spaced trees provides a boundary; the low height of the houses and their pantile roofs helping them to recede and fit with the older buildings of the village, although the repeating design is clearly modern.



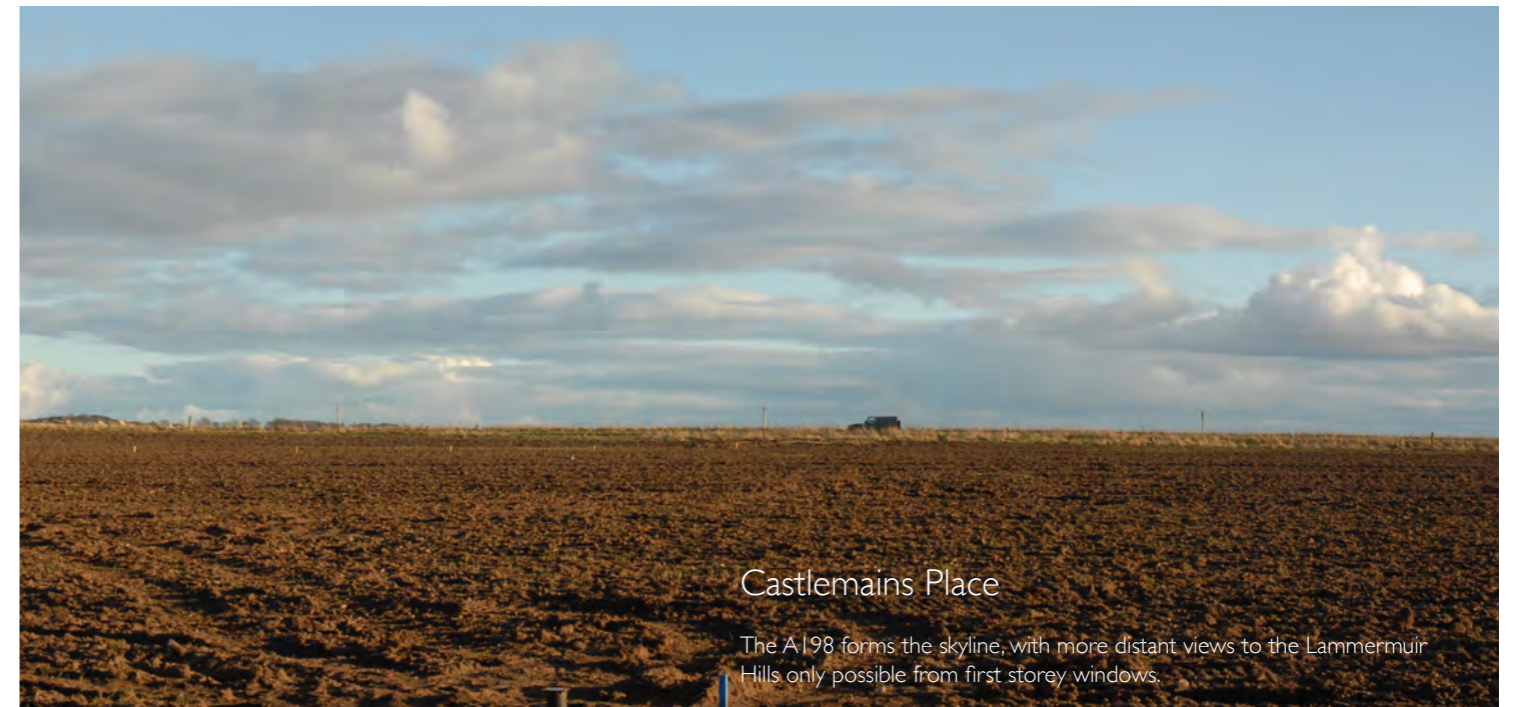
Corner of Castlemains Farm and A198

The open relationship of this site with the A198 is apparent. Development of this site would require a significant set-off from the A198 to achieve screening of the road and to establish a robust boundary to the settlement. This set-back would also be required if views to Dirlerton Castle from the A198 were to be retained without disruption.



Castle mains Place

An effective boundary is formed by the hedge and pairs of specimen trees. Development on the site here would impact upon views from existing houses across open farmland, albeit already cut by the A198.



Castle mains Place

The A198 forms the skyline, with more distant views to the Lammermuir Hills only possible from first storey windows.

Land to the south of Gylera Road

Description


An open, agricultural, field, on the southern edge of Dirleton adjacent to the A198. 1.95 hectares.

The site slopes southwards to meet the A198, from which it is highly visible. The existing houses of Gylera Road, with a scattering of mature trees along the road, mark the northern boundary. The east and west boundaries are defined by stone walls.

The site offers open views across the agricultural landscape and towards Berwick Law; the Bass Rock is visible in the distance from the east of the site. A community orchard has been established in the north western part, behind a newly planted hawthorn hedge.

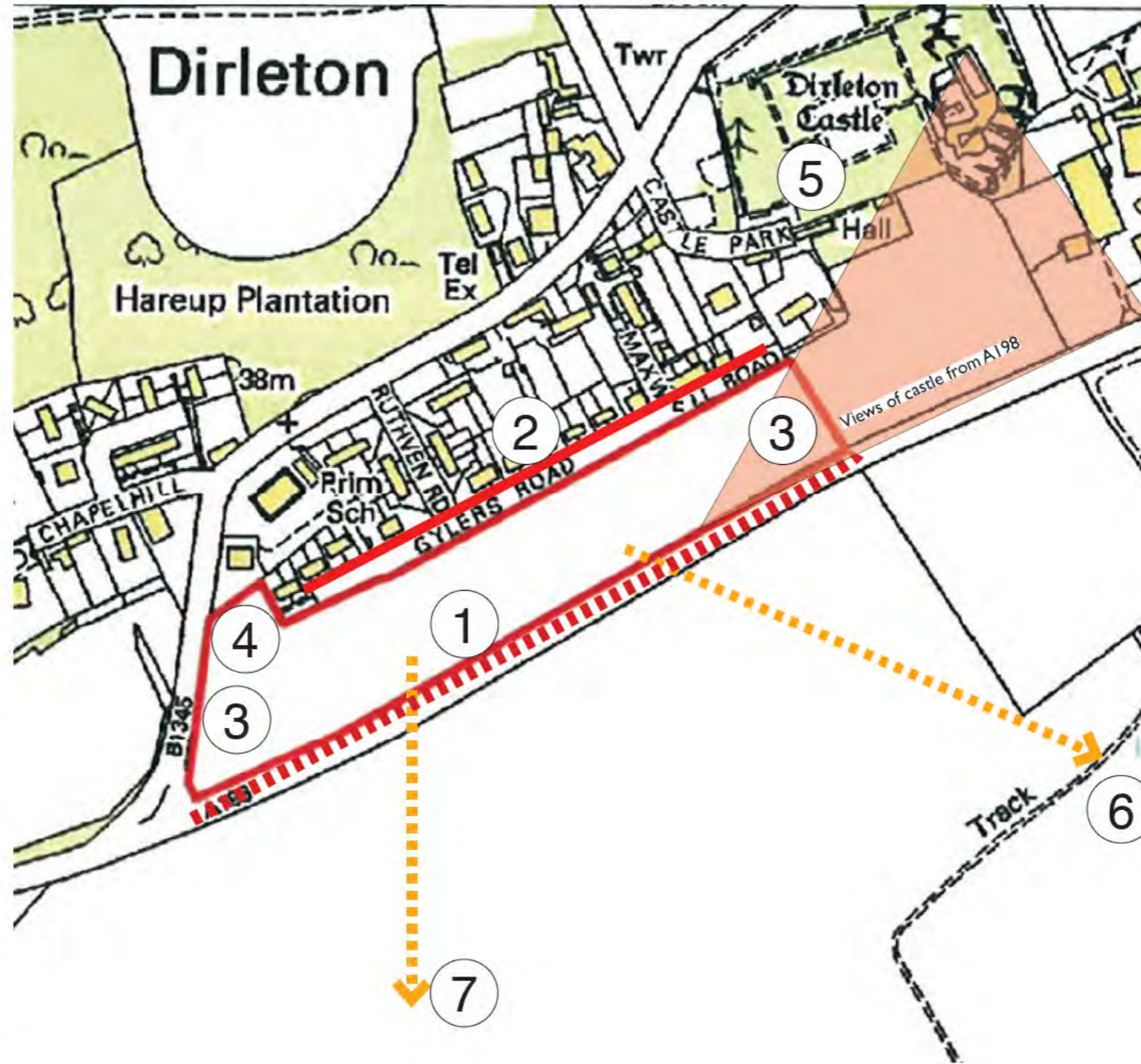
The castle lies north east of the site on an elevated rocky outcrop and it is likely that development on this site would be visible from parts of the castle. Expansion of housing on this site would have a disproportionate landscape and visual impact on the setting of Dirleton, due to the raised and prominent position visible from a wide stretch of countryside to the south.

1. No existing natural boundary to the south of the site allowing views to and from the A198.
2. Existing housing highly prominent.
3. Existing stone walls define the east and west of the site
4. Community orchard behind a newly planted hawthorn hedge
5. Dirleton Castle scheduled monument, listed buildings and garden and designed landscape.
6. Distant views from the east to Berwick Law
7. Views to Lammermuir hills across the East Lothian plain.

 Views to the castle from the A198

Appraisal

- +
 - A more robust boundary to the village could be formed against the A198 were substantial planting to be undertaken.
- - Development would change the setting of Dirleton Castle and would adversely affect the character of the Conservation Area.
 - Disproportionate visual prominence due to topography.
 - Achieving a robust boundary to the A198 on such a sloping site would be unlikely
 - Development would link Dirleton directly to the A198



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Entrance to the community orchard

Site 3



Fenton Barns (BI 345)

Located in the slight valley of the Mill Burn south of Dirleton, this viewpoint emphasises the prominence of Gylers Road houses relative to the castle, and reveals how well the main body of the village is nestled into the topography.



Gylers Road

The elevated position of Gylers Road affords extensive panoramic views to the south. Berwick Law dominates the relatively flat topography of large fields; the Lammermuir Hills are visible in the distance. Post and wire fences offer no boundary definition or screening of the A198; a row of widely spaced lime trees will in time develop into a boundary feature. The castle is not visible from this viewpoint, but comes into view towards the east end of the site.



Junction of Main Road and A198

As the A198 runs past Dirlerton the houses on Gylers Road stand prominent on the slope crest. The Gylers Road site is entirely open to view and provides no landscape boundary to either Gylers Road or to the A198. The castle is not visible. Development on this site would require a significant planted buffer to the A189; even with such planting, the terrain would leave new housing as exposed to view as the existing ones.

Conclusions

Ranking

The appraisal of each of the 3 potential sites has defined the landscape and visual character, constraints and capacity to accommodate development of each site.

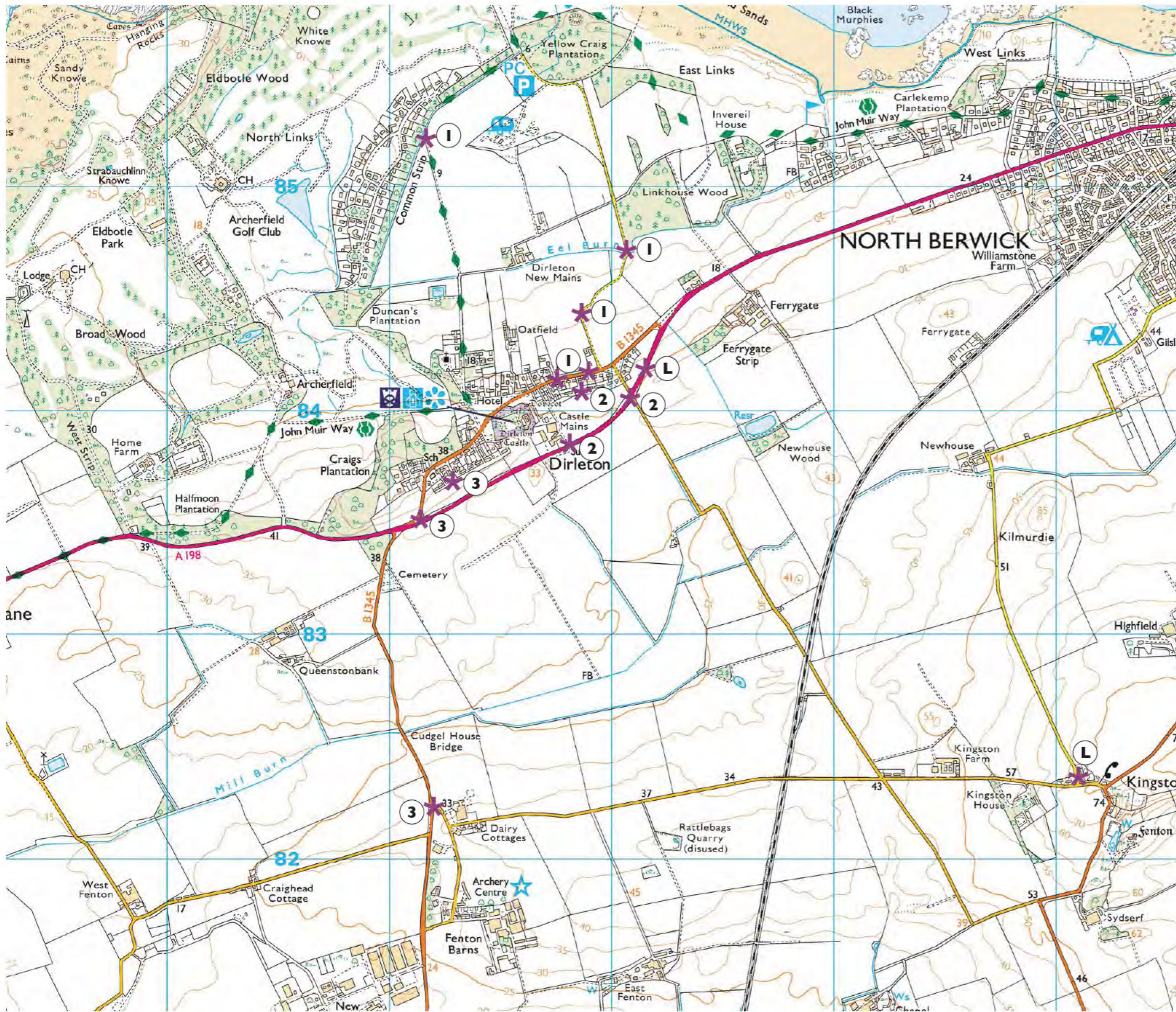
In order to attempt a comparative assessment, and arrive at a ranking of sites, a scoring system has been applied using the following criteria :

- Could a robust boundary to development, appropriate to the landscape character and effectively controlling visual impact to a satisfactory level, be created?
- Would development adversely affect the setting of the existing settlement?
- Would development be in character with the settlement pattern?
- Are there significant constraints to development or to creation of an appropriate landscape structure?
- Would development adversely affect significant natural features in the landscape, including their setting?
- Would there be an impact on historic/ cultural character of the castle and conservation area?

Each aspect has been scored on a ranking of 1 to 3 :

1. This positive criteria can be achieved readily / this negative criteria is readily avoidable
2. This positive criteria can be achieved only with sensitive design / this negative criteria is avoidable only with sensitive design
3. This positive criteria cannot be satisfactorily achieved / this negative criteria is unavoidable and significant

Site	Is a robust boundary possible?	Would development adversely affect the village setting?	Would development be in character with the settlement pattern?	Are there significant constraints?	Would development adversely affect natural features?	Would development adversely impact upon the historic character of the castle and Conservation Area?	Comments	Rank Score
1 Foreshot Terrace	1	1	1	2	1	1	This site has relatively low elevation. The existing boundaries provide a perimeter on three edges, greatly limiting overlooking; retention of the lime trees on Dirleton Road is vital and will require a minimum 12.0m set-back of buildings from the southern boundary. There is potential to form pedestrian routes into the site from Foreshot Terrace between the mature lime trees; this would help townscape integration. The preferred development pattern would be of north-south lanes from the access point on Wares Road, so that the irregular character of the northern edge of the village (no consistent built frontage, varying building aspects, greenspace and trees) is continued. This dispersed pattern of buildings would provide permeability. The use of traditional wall and hedge boundaries, rather than timber fencing, would best match the local character of garden boundaries.	7
2 Castlemains Place	2	2	2	2	1	2	This site has relatively low elevation and is overlooked from the A198 and rising land to south of the village. It would require a robust southern boundary set-back from the A198, to address noise and visual impacts of the road and to form an effective settlement boundary. This requirement appears to conflict with the desire to maintain views to the castle from the A198. Development would adversely impact upon the the setting of Dirleton Castle and the village Conservation area, appearing to surround it more in modern housing that separates it from the surrounding countryside. The sequence of views to the castle and mature trees surrounding it would be impeded. Residential garden boundaries would be exposed to the southern edge; traditional walls and hedges would be vital, rather than timber board fencing. Greater permeability to the village edge would be achieved with a north-south alignment of streets. Development should not extend southwards as far as the Station Road/ A198 corner because of its prominence in roadside views.	11
3 Gyler's Road	3	3	3	3	2	2	Would be highly visible from the south as site sits higher than the rest of village. Development would compromise the agricultural setting of Dirleton and a robust boundary to the development would be difficult to create. The visibility of existing houses on Gyler's Road indicates how prominent new development would be here, and how poorly fitted to the setting of Dirleton.	16



Appendix : Photo Locations

Numbers refer to site numbers, at which sections of the report the photos are included.

L = see Local Landscape Character section

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Foreshot Terrace, Dirleton

Housing Development Proposals
Landscape Design Statement

August 2016



For Muir Homes

Muir Homes

Foreshot Terrace, Dirleton

Landscape Design Statement

This report has been prepared for Muir Homes by Ian White Associates Landscape Architects.

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Introduction

This Landscape Appraisal and Design Statement has been prepared to inform proposals for new housing on a site immediately north of Foreshot Terrace in Dirleton. It includes a design response to the appraisal, which has been further detailed in the accompanying landscape drawings submitted for planning consent.

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Landscape Character

Dirleton is a village in East Lothian, approximately 32 km east of Edinburgh off the A198 on the B1345. It lies between North Berwick (4km east) and Gullane (3.5km west). The coast of the Firth of Forth is approximately 2km to the north. Dirleton is set on and around the rocky outcrops of Dirleton Castle and Chapelhill within open generally gently sloping arable land, but against the edge of the wooded sloping estate landscape of Archerfield.

Dirleton forms a rich composition of houses, gardens, woodland and open green clustered around the historic and scenic castle. The character of this village is strongly defined by its central green, surrounded by stone buildings and walls, framed by elegant mature trees. This village core lies to the north of a gentle ridge on which the castle lies; together with the estate woodlands of Archerfield, this ridge shelters and encloses the settlement. This intimate scale contrasts with the open agricultural terrain to the south and east. Later expansion of the village near the school has intruded beyond the enclosing landform and woodlands, becoming prominent in views from the open countryside.



The Green



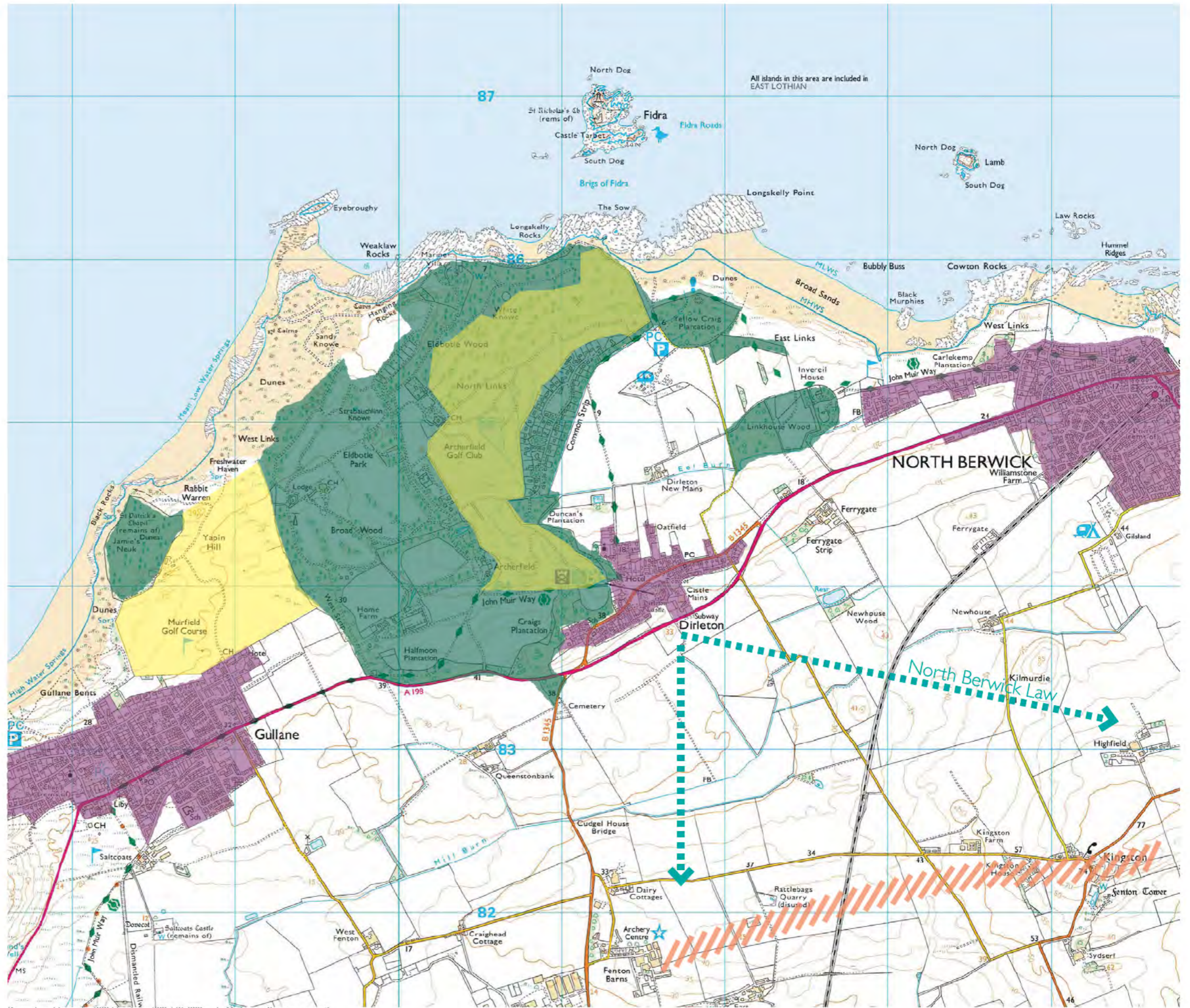
Older houses at the Green



Dirleton Castle viewed across the Green



Vine Cottage closes the eastern apex of the Green



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Local Landscape Character

The B1345/ Main Road forms the spine of Dirleton and was the main road between Gullane and North Berwick before the bypass A198 was built in 1975 to the south of Dirleton. The B1345 rejoins the A198 after passing through the village.

The south-western edge of Dirleton, where the B1345 leaves the A198, opens onto agricultural land to the south, affording extensive views which include North Berwick Law dominant over the relatively flat landscape. After rising to enter the village, the road descends the street past mature woodland lying on the north side. Soon after entering Dirleton, and passing the school, the green character of the village is apparent, with lawns bordering the side of the road. The cottages and houses along with the primary school are a mix of stone and harled buildings, the older buildings lining the street.

After passing Manse Road, a large triangular green is entered, bordered by houses and two inns on the north and west sides and by Dirleton Castle on the south. A line of mature trees define the north of the green whilst the impressive stone wall of the castle grounds mark the south of the green; beyond this wall many large trees form a strong backdrop to the green. The castle itself is largely hidden, with the tops of the gables only visible from the south of the green.

Within the village of Dirleton there is a rich composition of houses with gardens and open greens. Garden boundaries are varied and attractive. Stone walls rather than hedgerows are prominent features of the village. There is permeability of views through extensive mature trees and gardens that allow glimpses to the buildings beyond, whilst presenting a strong frontage onto the street and green.

Most buildings are of small scale, although there are exceptions including the church, the castle, Oatfield House, Dirleton House and the Red House, built to house Estate workers. The 2 inns in the village, The Open Arms and The Castle Inn, sit centrally to the village and face onto the main green.

Materials used to finish the walls of buildings in the older part of the village are almost exclusively stone. Roofs tend to be either natural slate or clay pantile.

Passing eastwards beyond the green, Dirleton Road has 20th century housing of rather uniform character and single storey scale; they are mainly of white rendered walls, with some stonework. At Foreshot Terrace a belt of mature trees, chiefly a line of limes, mark the north side of the road, forming an impressive feature that defines the character of this part of the village.

Wider Landscape Character

The Lothians Landscape Character Assessment published by SNH (1998; Ash Consulting Group) describes this locality as lying within the Coastal margins - North Berwick Plain, which has the following characteristics :

- Subdued topography of the area with the coastal plain character extending well inland - virtually flat at first then gradually giving way to gentle undulations towards the south.
- Within most of the area views across the sea are common, emphasising the open, level nature of the coastal plain.
- North Berwick Law dominates the plain and has echoes in the distinctive profiles of Bass Rock and Craigleith offshore.
- Diverse range of scenery and habitats along the coast – crags, small sandy coves, dunes, broad beaches, estate woodlands.
- Golf courses, footpaths, car-parks, caravan and picnic sites along the coast utilise its recreational potential.
- The hummocky terrain, short grasses and sandy soil of the links are ideal for golf; courses form distinctive elements in the landscape, with historic significance in the development of the game.
- The links and dune systems are of nature conservation value and carry scattered scrub of gorse and sea buckthorn.
- Agricultural land use is dominantly arable. A distinctive large-scale network of fields and are broken by fences, hedgerows or occasional stone walls. The few burns flowing across the plain have been straightened and often incorporated into the field pattern.
- The area is also particularly rich in policy woodlands.
- Settlement is concentrated mainly along the coastal fringe, where a number of highly attractive and distinctive small towns and villages are strung out along the A198 including; Longniddry,

Aberlady, Dirleton, Gullane and North Berwick. Further inland, a network of often near-straight minor roads links numerous cottages and large farmsteads. Many of the older buildings are constructed of red sandstone rubble and pantiled roofs.

- The fertile swathes of crops combine with extensive estate woodlands, locally distinctive villages, farmsteads and mansions, and a varied coastline to create a highly attractive landscape of great diversity.

The SNH report identifies several forces for change in this landscape; recognition of these factors should inform the design of new development so that it does not accelerate adverse change, and opportunities for enhancing landscape quality and durability are taken :

- High visual sensitivity of immediate coastal zone;
- Potential visitor pressure from successful tourism and recreation
- Pressure for residential expansion of coastal settlements.

and concludes with a number of guidelines for maintaining the integrity of this landscape character area :

- Require careful visual integration of new built developments
- Maintain and reinstate existing hedgerows and trees
- Seek to secure long-term management of key estate landscape features
- Promote integrated coastal zone management strategy including visitor management, tourism, recreation and other developments
- Encourage limited increase in farm woodlands to integrate recent expansion of buildings
- Preserve character of minor road network and its linkage to field pattern

Landscape Designations

The following landscape planning designations affect the environs of Dirleton :

Dirleton Conservation Area

Comprises the entire village and setting. The central green surrounded by attractive old buildings and gardens forms a place of strong character and high landscape and visual value that define Dirleton.

Dirleton Castle Scheduled Ancient Monument and Designed Landscape

Category A listing includes the castle and associated dovecot, ancillary structures, gardens and boundary walls. The castle is built on a rocky outcrop, elevated above the core part of the village.

Archerfield Estate Woodlands

The mature woodlands of the Archerfield estate Designed Landscape cloak the western part of Dirleton, contributing to its mature, green and sheltered character. A small plantation to the eastern edge is also an important landscape feature. Throughout the village, there are mature trees many of which are protected by a Tree Preservation Order. Within the Conservation Area all trees have protection.

Archerfield House

Category A listed building.

Core Paths

The local East Lothian core paths network is illustrated. The green dashed line highlights the John Muir Way, which stretches 215km between Dunbar and Helensburgh.



Berwick Law dominates the relatively flat topography of large fields; the Lammermuir Hills are visible in the distance.

The key landscape characteristics are :

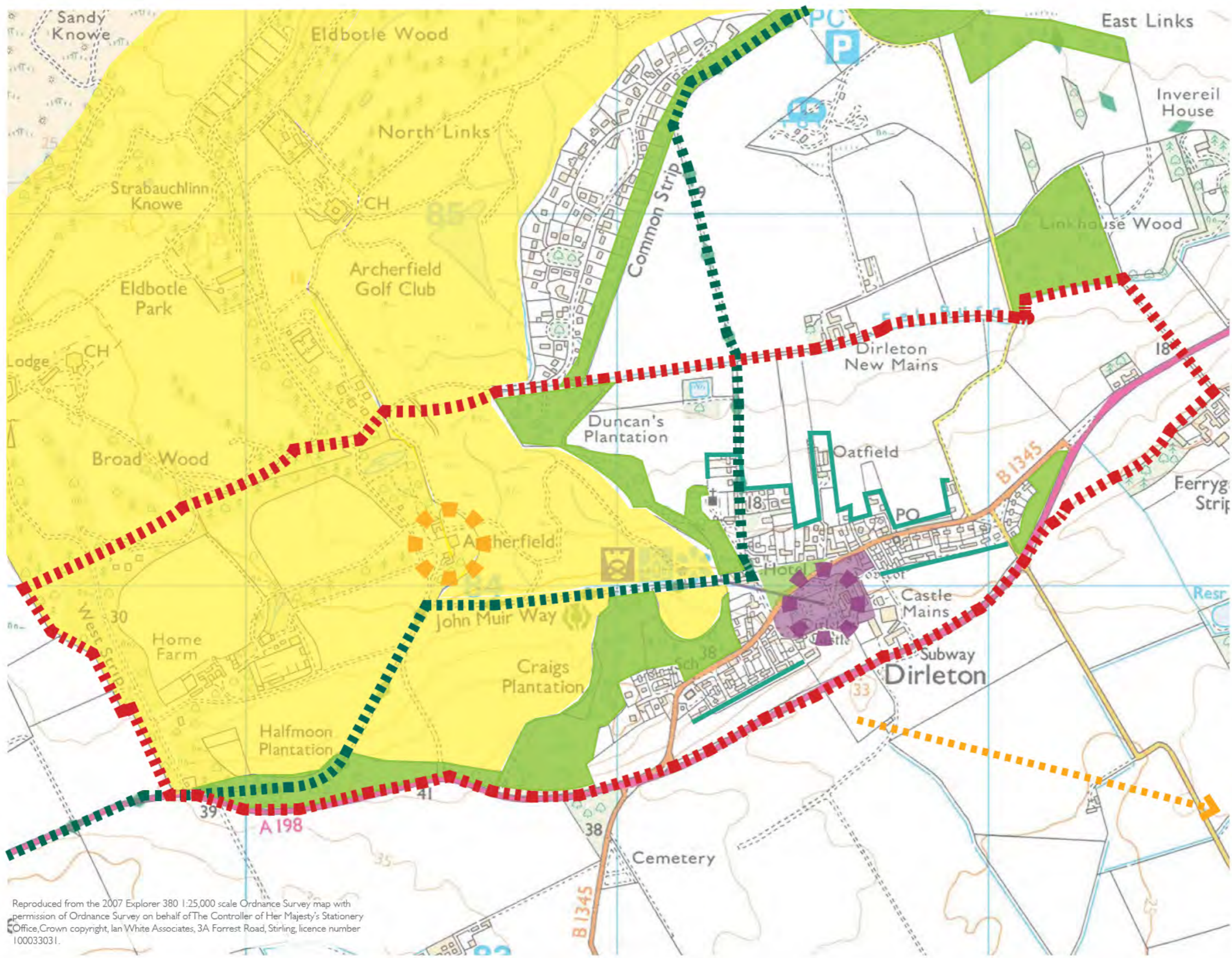
1. Village green with castle – historic core of the settlement
2. Exposed southern edge
3. Varied northern edge integrates with the farmland setting – mix of buildings, hedges, trees and fields
4. Woodland setting to the west



The smaller Green at the church and war memorial



Main Road leads east towards Foreshot Terrace



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Local Landscape Character

- 
Dirleton Conservation Area
 Comprises the entire village and setting

- 
Dirleton Castle Scheduled Ancient Monument
 Category A listing includes the castle and associated dovecot, ancillary structures, gardens and boundary walls. The castle is built on a rocky outcrop, elevated above the core part of the village.

- 
Dirleton Castle Garden and Designed Landscape

- 
Green
 The central green surrounded by attractive old buildings and gardens forms a place of strong character and high landscape and visual value that define Dirleton.

- 
Woodlands
 The mature woodlands of the Archerfield estate cloak the western part of Dirleton, contributing to it's mature, green and sheltered character. A small plantation to the eastern edge is also an important landscape feature. Throughout the village, there are mature trees many of which are protected by a Tree Preservation Order.

- 
Archerfield Estate
 An Inventory Designed Landscape with strong woodland structure, into which golf links and luxury housing have been inserted.

- 
Archerfield House
 Category A listed building.

- 
John Muir Way
 A 215km long walking route, locally following pre-existing tracks and paths.

- 
View to North Berwick Law
 The Law is visible from the south of the village.

- 
Open countryside edges
 The southern edge of the village is regular, linear and out of character with the village core. The northern edge is varied, irregular and integrates with the farmland.

Listed Buildings

1. Dirleton Village School
Category B listed
2. Easter Slap, Ivy Bank, Boonslie, Holly Bank
Category B listed
3. Castle Inn
Category C listed
4. The Red House, Swiss Cottage, The Old Manse
Category B listed
5. Archerfield East Lodge
Category B listed
6. Dirleton Parish Church
Category A listed
Church Session House, Church Hall, Walled garden and wall
Category B listed
7. War Memorial
Category C listed
8. Dirleton House
Category B listed
9. Rose Cottage
Category C listed
10. Dirleton Caste, Dovecot, Castle gate, tower and north and west gateways
Category A listed
11. 3, 4, 5 Main Road, 6 & 7 Castle Mains Cottages
Category B listed
12. Oatfield
Category B listed
13. Vine Cottage
Category B listed
14. 1-12 Fidra Avenue
Category B listed
15. Cedar Grove
Category C listed



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Ecology

A Preliminary Ecological Appraisal has been produced by GLM Ecology and is submitted separately. It includes a desktop study, Phase I habitat survey and a habitat assessment for protected species.

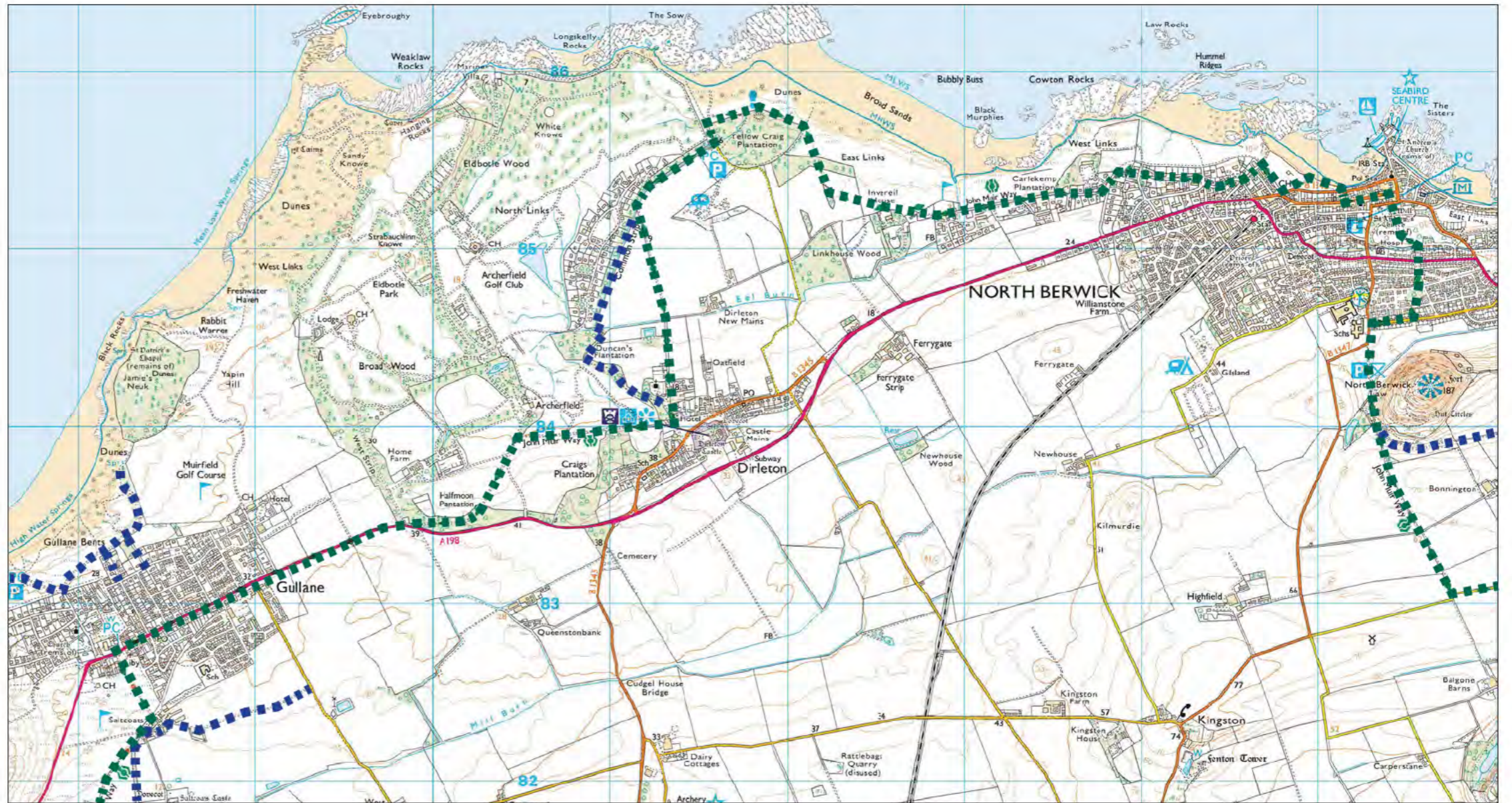
The survey identifies that the site proposed for development is predominantly arable farmland, with other small areas of grassland, ruderal, hedgerow and mixed plantation woodland that are considered to be of very limited ecological value. Modern farming practices (i.e. cropping regimes, management of weeds and pests by spraying) have resulted in a species-poor flora on the area of the site to be developed.

The only statutory designation in the locality is the Firth of Forth SPA and SSSI, which will remain unaffected by the development proposed.

Fauna is limited within the site area, due to the intensive farming activity. No adverse impact on protected species of bird, mammal, amphibian or invertebrate is expected.

Arboriculture

A tree survey of all the mature trees on or adjacent to the site has been undertaken, in accordance with BS 5837:2012, and issued as a Tree Survey and Arboricultural Report by Langton Tree Specialists. This has identified the likely spread of roots, from which a Root Protection Area has been defined. The proposed layout will avoid building works and changes to ground conditions within this zone, to safeguard the health of these fine trees and the contribution they make to the character of Dirleton.



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Local Views

John Muir Way

Situated on the flat arable land north of Dirleton, the John Muir Way here leads inland from the coastal links, passing through Dirleton and then Archerfield. The visible northern edge of the village is a discontinuous, varied mix of houses, walls, hedgerows, woodland belts and lanes. Dirleton Castle is visible on the skyline, tipping above the mass of mature trees in the heart of the village. The overgrown cypress hedge surrounding Speedwell Gardens is apparent, partially obscuring the Foreshot Terrace site from view.



General view from Kingston, south-east of Dirleton

Kingston offers an extensive panoramic view across the coastal plain and the Firth of Forth, extending to the Ochil and Lomond Hills beyond. A large-scale field pattern of mainly arable land, weakly defined by hedgerows and stone walls with few trees. Woodland forms a setting for Dirleton with the bulk of the village sitting below the areas of woodland.

The houses on Gylers Road are very prominent considering their modest size; they appear elevated above the height of Dirleton castle. They form a crude edge of the settlement against the open countryside, appearing to lie beyond the extents of the historic village gathered around the castle.

Scattered small scale wind turbines are present south of Dirleton; some larger turbines are visible in Fife.

Housing on Castlemains Place is visible set down into the topography, at the lowest visible part of Dirleton. The modest scale of houses on Castlemains Place is apparent.





Corner of A198 and Station Road

Looking west the castle is prominent rising above the village, the core of which lies amongst mature trees to its north. The A198 curves to the south of the village without screening or boundary features. Castlemains Place is rather prominent due to the linear frontage and absence of significant landscape elements to break up the uniformity; the hedgerow and trees assist in screening low level clutter and are more effective in the growing season.



Corner of Main Road and Ware Road

This view looking towards the village core highlights the importance of the line of mature lime trees to the streetscape, providing stature that contrasts with the modest and uniform housing of Foreshot Terrace. The low stone wall contributes character, continuing around the C-listed Cedar Grove on the corner. Archerfield woodlands prevent views to the Firth of Forth, but distant hills in Fife are seen above the trees. The proposal site is glimpsed between trees in the garden of Cedar Grove.

Landscape Characteristics of the Site

Foreshot Terrace forms a part of Dirleton Road, the principal road running through the village, en route between Gullane and North Berwick. The proposed site north of Foreshot Terrace lies at a low point of the village, towards its northern edge. An agricultural field, almost flat, with a gradual slope down towards the north, the site covers 1.7 hectares. It is located on the principal route through the village, but lies behind a belt of mature trees and mixed young woodland that bounds the north of Foreshot Terrace. These mature trees give the southern boundary strong definition; it consists of predominantly lime with lesser trees of sycamore and ash. The trees are protected under a tree preservation order (TPO), and other mature trees on the western boundary of the field are protected through inclusion within the conservation area. To the north of the site the boundary is currently undefined offering open views to the wider landscape.

These factors combine to give the site strong visual containment from the south and west and provide a mature setting. The character of this northern side of the village is one of variety and small scale; a mix of buildings, walls, hedgerows, trees and fields form an irregular edge to the settlement. Buildings are orientated in various directions and subtly vary in appearance; their pattern is dispersed.

Landscape Design Strategy

Consideration of this landscape setting has driven the concept for the layout of proposed development on the site.

Successful integration of the development into the local landscape will require a clear landscape strategy, that achieves the following key aims :

- to promote a coherent landscape structure and pattern
- to increase the diversity of landscape features
- to encourage a compact and traditional settlement pattern
- to improve and connect different habitats into a robust network
- to integrate public access and pedestrian permeability

The layout takes vehicular access from Ware Road but forms a strong pedestrian connection southwards to Foreshot Terrace, creating permeability of walking routes into the village. A generous set-back from the southern boundary allows for healthy growth of the mature trees.

The mature lime trees along Foreshot Terrace will be retained and protected; these trees have been surveyed by an arboriculturalist and root protection areas identified within which no development would

take place. The root protection zone for mature trees will lie within generous rear gardens, which provide a comfortable offset to limit the effect of shading on the new houses.

A Green at the heart of the site provides a focus for the layout, together with lime trees bringing the character of the old village core. This Green incorporates a path that runs diagonally across the site, providing a convenient desire line between Main Road and Ware Road.

The northern boundary against farmland will be strongly defined by a native hedgerow, a woodland belt of 30m width and the community orchard and water basin. This will create a robust and varied settlement edge through which some houses will be visible, in the character of the northern edge of Dirleton. Sustainable drainage is integrated as an attractive wetland meadow habitat.

The western and eastern boundaries with adjacent residences are strengthened with woodland and hedgerow, reinforced with taller evergreen shrubs within the deep rear gardens.

Front garden boundaries of hedging and stone walls respond to the character of older parts of Dirleton. Gardens with hedging and trees create intimate green streets, giving the development an attractive scale. Garden hedges will be of beech to provide traditional enclosure and privacy.

Specimen trees permeate the layout, oak and lime being planted for long-term scale and structure in keeping with the village core and the mature trees lining Foreshot Terrace. Smaller tree species are planted in gardens where closer to buildings and to avoid creating excessive shade.

The northern boundary contains an orchard within meadow and a wetland basin. The orchard, of traditional Scottish varieties, will include bulb planting and bespoke timber seating as part of the 'percent for art' strategy.

In keeping with the rural setting, a timber post and wire stock fence will be installed to the northern boundary. Rear garden boundaries will be of 1.20m height timber palisade type, often accompanied by a hedge to provide a long-term boundary feature. 1.80m closeboard fencing will be used where close to adjacent houses for privacy of patio areas.; In any instance where such fences face into the street, planting will be used to obscure it.

Appraisal of Landscape and Visual Impacts

The likely effects of the proposed development on landscape character and visual quality have been appraised, following the Guidance for Landscape & Visual Assessment (3rd Edition; 2013). A summary methodology is included as an appendix.

Area of Great Landscape Value

The AGLV covers the Firth of Forth coastline and Archerfield estate, north of the proposed site. It is a landscape of high sensitivity. The AGLV boundary lies 850m from the site boundary where it is defined by the coniferous shelterbelt surrounding Archerfield. This shelterbelt provides a strong landscape and visual boundary to the AGLV and will, together with the proposed robust woodland boundary to the site, prevent the development from harming the character and appearance of the coastal landscape protected by the AGLV designation.

Conservation Area

The site lies within Dirleton Conservation Area, which is of high sensitivity. It is away from the core part of the designation and lies behind a prominent line of mature trees that contain the southern edge of the site and are an important feature in defining the settlement character on entry from the east. The castle grounds, village greens, mature trees, building and garden groupings that define the historic core of Dirleton exist to the west of the site; Foreshot Terrace is more recent in age and has a more regular appearance whilst maintaining the small scale of buildings.

The proposed development is of dispersed, irregular character that is consistent with the detached villas north of Main Road in this part of the village. The reinforcement of existing boundary woodland and the use of strong traditional hedgerows to define front gardens and the site boundary set the new housing within a robust landscape structure that limits views. The magnitude of change on the Conservation Area will be slight, and the nature of effect minor.

Garden & Designed Landscape / setting of Dirleton Castle Scheduled Ancient Monument

Dirleton Castle Designed Landscape and Scheduled Ancient Monument lies 120m to south-west of the site. It is of high sensitivity. The intervening buildings lining Main Road provide part of the setting for this designated landscape, and many are themselves Listed. However, the site is sufficiently separate in distance, and has a strongly defined boundary of mature trees that provide distinctive separation, for the proposals to have only a slight magnitude on the

setting of these designated features. Views to the castle from the north of Dirleton are already very limited by intervening woodland and buildings; only the tops of roofs and chimneys are seen above the trees, and this would remain the case from the John Muir Way and from Ware Road. The woodland belt proposed would form an edge consistent with the northern edge of the village, at which houses are seen amongst trees, woodland plots, hedges, walls and strips of grazing land; the effect is informal and varied.

Views from the castle to the site are extremely limited in scope and glimpsed between existing mature trees. The development would be glimpsed and appear of a character with the villas visible in the middle-distance lying between the castle and the site; growth of the proposed western tree belt and trees within the site would serve to filter and subdivide the proposed housing in this glimpsed view.

The magnitude of change will be slight, and the nature of effect minor and not fundamental to the character of the view.

Local Residents

The site has residences on 3 sides, all set back from the boundary. To the west, the houses have large gardens with mature trees and shrubs intervening between them and the site boundary. The proposals provide for a boundary planting strip, hedgerow and rear gardens, which together will reduce the prominence of new houses. To the east the same approach is followed. The magnitude of change will be moderate. The anticipated change in character will be minor.

To the south of the site, properties on Foreshot Terrace look towards the proposals across the road and through the tree belt. Reinforcement of the understorey vegetation will increase the density of effective screening (at up to 4m height); views will remain, especially in winter. The houses will be well set-back from the boundary and this will reduce their apparent scale. Their dispersed arrangement allows views between them to the proposed woodland belt beyond. The magnitude of change will be moderate. The anticipated change in character will be minor.

Ecology

The potential adverse impacts of the proposals on the existing ecology of the site and surroundings are very limited; the development area lies on fields that are subjected to annual arable cropping and thus have very limited intrinsic ecological value.

The objective of the landscape design is to achieve an improvement in biodiversity across the site and neighbouring land. The landscape framework will create and connect different habitat types to form a robust habitat network, consisting of :

- Native deciduous woodland
- Native mixed hedgerows with intermittent hedgerow trees
- Meadow grassland
- Damp meadow and aquatic marginal habitat
- Orchard and avenue trees in meadow grassland
- Residential gardens with a mix of native and non-native ornamental species, and beech hedges

The species mixes proposed for new habitats are detailed in the Landscape drawings. The Landscape Maintenance and Management Plan details how the landscape framework will be managed to aid establishment, healthy growth, habitat diversity and public access.

Implementation

The proposed landscape scheme will utilise topsoil stripped from the site. This operation will be undertaken in accordance with BS 3882 : 2007; topsoil will be stripped and stockpiled separately from subsoil; stockpiles will not exceed 1.50m in height and will be located away from steep slopes or locations where runoff could enter the watercourses.

Establishment of new stock fencing to the site perimeter will be required at the outset of development to enable continued grazing of adjacent pastures and cultivation of arable land. Planting of boundary hedges and woodlands would be undertaken at this early stage (subject to season) to establish the landscape structure.

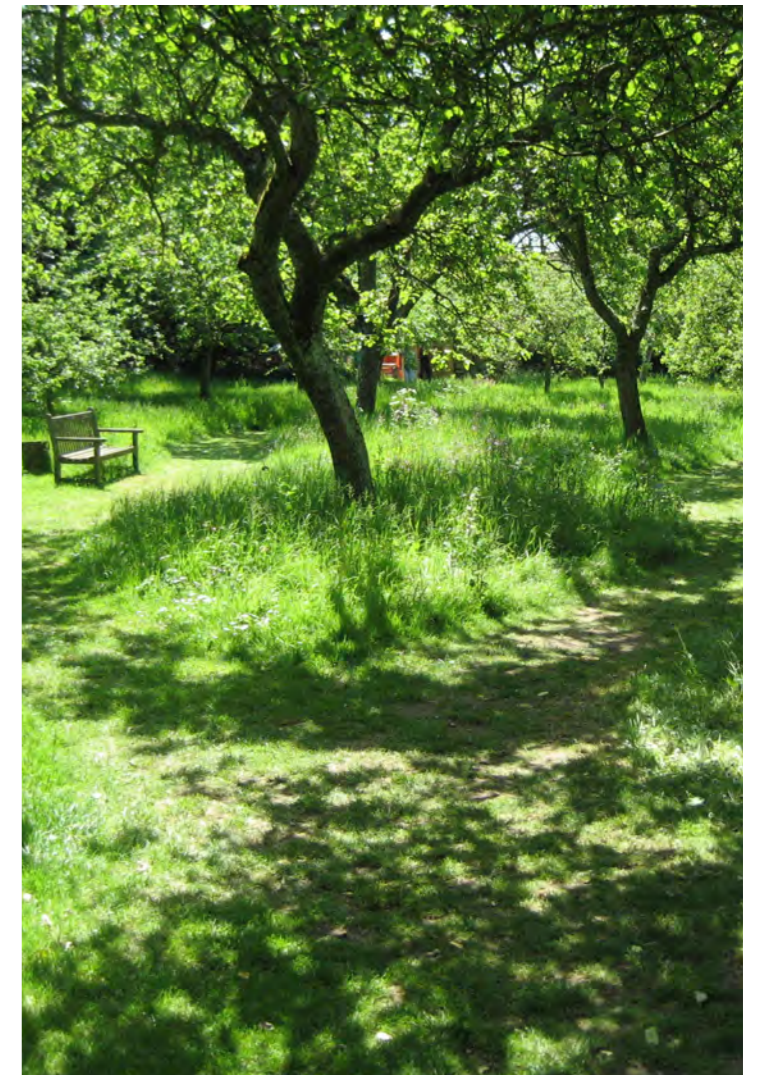
Management

The Landscape Maintenance and Management Plan details how the landscape framework will be managed to aid establishment, healthy growth, habitat diversity and public access.

Summary

The proposed site is well-located off the principal street of Dirleton (Dirleton Road / Foreshot Terrace). Being relatively low lying, flat land, it is favourable for building. Development would be set behind the existing mature trees and over 1.50m lower than Foreshot Terrace, and thus of limited visibility and scale viewed from the main street. It is strongly contained along east, south and west boundaries, by existing mature trees, houses and boundary walls/hedges. Visibility from open countryside to the north is limited by flanking buildings, boundaries and mature trees.

The proposed landscape scheme will establish a strong new structure of planting and habitats that help integrate the development and provide for its residents and natural habitats. The proposed development would not adversely impact on the character of the conservation area.



Methodology

Guidance on Methodology

The method of Landscape and Visual Impact Appraisal is guided by the recommendations of the 'Guidelines for Landscape and Visual Impact Assessment :Third Edition' (2013) published jointly by the Landscape Institute and the Institute of Environmental Management and Assessment.

Baseline Study

The existing landscape character and quality is assessed through desktop study and field visits to provide an understanding of the baseline into which the proposed development will be inserted. This assessment identifies characteristics of the landscape which can be considered as receptors for predicted change resulting from the development, and it also identifies the value of each receptor.

Local or national landscape designations provide a basis for recognising valued landscapes. Landscapes can also be valued by communities for many reasons even if not designated. Judgements on the condition of the landscape, intactness, diversity, consistency, representativeness, social and cultural associations are also important in the process of defining the baseline.

The existing visual baseline should identify the most important visual receptors (those human receptors with views of the site). These are illustrated by photographs taken at key viewpoints.

Defining the predicted effects of the Development

The development proposals are set out in the Design Statement. From this a description of effects likely to have implications on landscape and visual receptors is defined.

Assessment of Effects

Once the effects of the development are defined the sensitivity of each receptor to changes can be assessed; this combines an assessment of the value of the receptor and their vulnerability to the predicted effects. The magnitude of change predicted to occur to that receptor is predicted, considering the nature of effect, duration and reversibility.

The measure of effects resulting from the development is expressed in terms of Significance. Two criteria determine the significance of impacts:

1. the Sensitivity of the landscape or visual receptor upon which the effect is imposed (or 'Nature of Receptor' as promoted by IEMA)
2. the scale or Magnitude of the effect (or 'Nature of Effect' as promoted by IEMA)

Sensitivity is a measure of the degree to which a landscape type or visual receptor can accommodate change without detrimental effects to character (landscape) or visual amenity (of the receptor). Sensitivity of a landscape type is determined by evaluation of the baseline value and the degree to which key elements of the landscape type can be replaced or altered before adverse change to the landscape character occurs. Sensitivity of a visual receptor will depend upon the location and context of the viewpoint, the nature of activity undertaken by the receptor and cultural value of the view.

Magnitude is a measure of the scale or degree of change to the landscape resource or visual amenity, which includes consideration of the nature of the effect and whether it be temporary or permanent and the geographical extent of the area effected. Magnitude is expressed in this report as either Adverse or Beneficial. Due to the potential for effects to be either temporary or permanent, the magnitude may be expressed as either a single, permanent value, or as temporary and permanent values along with an explanation for the nature and duration of change in magnitude.

A balanced and well-reasoned judgement of magnitude and sensitivity enables a judgement to be formed as to the overall Nature of the Effect (the likely level of impact). This is expressed according to table 3, and described as adverse or beneficial. This judgement is not derived directly through the use of a matrix but rather by a reasoned judgement explained in the narrative text.

Table 1 Criteria for Assessment of Sensitivity

Sensitivity	Landscape	Visual Receptor
High	A landscape character type or element that has little ability to absorb change without fundamentally altering its present character; or is of designated importance, distinct and of high value.	Activity of the receptor is directly related to the visual quality of the setting and there is little ability to absorb change without fundamentally altering this experience. A view of recognised value.
Medium	A Landscape whose character and elements allow some change to be accommodated without significantly altering the character; provided the effect is of limited magnitude; or a landscape of high value.	Activity of the receptor is not directly related to the visual quality of the setting, or may be transitory or less exposed to the view. There is moderate ability to absorb change without fundamentally altering this experience. A view of high value.
Low	A landscape which is tolerant of change without detriment to its character; due either to the existing poor quality of the landscape (lacking characteristics and elements that give it value) or the robustness of the landscape character that makes it resilient to change. Landscape of low or local value.	The visual receptor is tolerant of change without detriment to the experience; it will not notice or be affected by change to the view. The view is of low value.

Table 2 Criteria for Assessment of Magnitude

Magnitude	Landscape Effects	Visual Impact
Substantial	Dominant. Major alteration to or loss of key elements of landscape character; or the introduction of elements considered to be uncharacteristic within the receiving landscape, such that the post-development character will be fundamentally changed.	Dominant. The proposals form a significant and immediately apparent part of the scene that fundamentally changes the overall visual experience
Moderate	Prominent. Partial loss/alteration to key elements of landscape character; or introduction of elements that may be prominent but not necessarily substantially uncharacteristic of the receiving landscape, such that the post-development character will be materially changed.	Prominent. The proposals form a visible and recognisable new element within the scene, readily noticeable by the observer; and causing material change to the visual experience.
Slight	Present. Minor loss / alternation to the landscape character; or introduction of discernible elements not uncharacteristic of the receiving landscape.	Present. The proposals are of limited scale or visibility and awareness of them does not have a marked impact on the overall visual experience
None	Negligible. Change to the landscape character that is so minimal, or the introduction of elements so characteristic of the existing condition, that the effect is barely distinguishable or there is no effect at all.	Negligible. The proposals are either not visible, such a small part of them is discernible, or the distance so great, that the change is nil or scarcely appreciated.

Table 3 Appraisal of the Nature of any Effect

Nature of Effect	Landscape Effects	Visual Impacts
Major	<p>Adverse : The proposals would result in effects that are at considerable scale or variance to the landscape character and will degrade the integrity of the landscape, or will cause substantial damage to a high quality landscape.</p> <p>Beneficial: The proposals would result in considerable change to the landscape character, creating new landscape character of high value or affecting profound improvement to the baseline.</p>	<p>Adverse : Proposals would cause a substantial deterioration in visual experience.</p> <p>Beneficial : Proposals would cause a substantial improvement in visual quality.</p>
Moderate	<p>Adverse : The proposals would be out of scale or at odds with the local pattern or landform and will leave an adverse impact on a landscape of recognised quality.</p> <p>Beneficial: The proposals would fit well with the landscape character and improve the quality through removal of damage caused by existing uses.</p>	<p>Adverse : Proposals would cause a noticeable deterioration in visual quality.</p> <p>Beneficial : Proposals would cause a noticeable improvement in visual quality.</p>
Minor	<p>Adverse : The proposals would not quite fit the scale and form of the existing landscape or would affect a landscape of recognised character.</p> <p>Beneficial: The proposed scheme would fit in with the scale and pattern, and restore some of the valued characteristics lost through current land uses.</p>	<p>Adverse : Would cause a barely perceptible deterioration in visual quality.</p> <p>Beneficial : Would cause a barely perceptible improvement in visual quality.</p>
None	<p>Scheme would compliment existing scale, landform, pattern, and maintain existing landscape quality and character.</p>	<p>No discernible change in the existing visual quality or character.</p>

The potential duration of effects are considered. Short-term effects resulting from construction works are temporary in nature. Long-term or permanent effects operate over the lifetime of the development (buildings, roads, trees etc), although their magnitude can diminish as planting grows and contributes to the creation of landscape structure and visual amenity.

DOCUMENT 5: - SITE AT FORESHOT TERRACE, DIRLETON – EFFECTIVENESS ASSESSMENT

With respect to the assessment of site effectiveness, as set out in paragraph 55 of PAN 2/2010, the following assessment related to the Foreshot Terrace, Dirleton site is considered appropriate: -

- *ownership*: the site is in the ownership of a party who is actively promoting the site for development and is under option to purchase by an established house builder (Muir Homes);
- *physical*: the site is free from constraints related to slope, aspect, flood risk, ground stability or vehicular access which would preclude its development;
- *contamination*: previous use has not resulted in contamination of the sites;
- *deficit funding*: public funding is not presently required to make residential development economically viable;
- *marketability*: the site can be fully developed within the LDP period. It is anticipated that development could commence within 12 months of the LDP being adopted subject to securing the required permissions. The site is presently the subject of a detailed planning application for 24 units;
- *infrastructure*: Education infrastructure is available/can be made available for the proposed scale of development (capacity presently available at Dirleton Primary School and an off-site contribution for the expansion of North Berwick High School would be required); water and drainage infrastructure is available. Access is not a constraint; and
- *land use*: housing is the sole preferred use of the land in planning terms.

From: [Environment Reception](#)
To: [Policy & Projects](#)
Subject: FW: LDP Response
Date: 01 November 2016 08:47:45
Attachments: [LDP response \(1\).docx](#)
[LDP response Gullane Technical.docx](#)

-----Original Message-----

From: JEREMY FINDLAY
Sent: 28 October 2016 10:52
To: Environment Reception
Cc: tomdrysdale@btinternet.com
Subject: LDP Response

Dear Sir/Madam,

I attach Gullane Area Community Council's response to the proposed Local Development Plan as approved by East Lothian Council on 6 September, together with a separate technical note relating to the sites in Gullane proposed for housing development.

You will note that in our response we have commented in Section 1 on the proposed LDP itself and in Sections 2 to 6 on certain of the subsidiary documents which you published at the same time. We have tried to discover without success whether we should have sent you a separate response to each of these subsidiary documents.

Could you please let us know if you would prefer us to do so?

Please confirm that this letter and attachments have been received by you in a timely fashion

With best wishes
Jeremy Findlay

GULLANE AREA COMMUNITY COUNCIL

(Representing Aberlady, Dirleton, Drem and Gullane)

www.gaddabout.org.uk

Chairman: J D Findlay

28 October 2016

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

ldp@eastlothian.gov.uk

Dear Sirs

East Lothian Proposed Local Development Plan

We make the following representations and consultation responses to:-

The Proposed Local Development Plan
The Proposed LDP Draft Environmental Report (EA)
The Proposed Local Development Plan Draft Action Programme
The Proposed LDP Draft Affordable Housing and Tenure Mix
The Proposed LDP Draft Development Briefs
The Proposed Local Development Plan Draft Developer Contributions Framework

Section 1 – Response to the Proposed LDP

Assessment of Overall Suitability of Sites in Proposed Local Development Plan (the proposed LDP)

We are deeply concerned by the clear disregard for the South East of Scotland Strategic Plan and the Scottish Planning Policies upon which it was based. All three of our main

villages are subject to one or more major developments. It is clear in the Strategic Development Plan that there should in principle be none.

Our assessment for Gullane, which with three major sites and one smaller one would be subject to the greatest scale of over-development (resulting in a projected population increase of approximately 30%) has been based on our responses to two Planning Applications recently lodged by developers in respect of Saltcoats (NK7) and Fenton Gait East (NK8). These are 16/00594/PPM and 16/000587/PM respectively. In our view these were premature and intended to prejudice what should be a plan led process.

Although we were concerned about its overall size, we have been supportive of the major re-development of the Fire Service college site (NK6), which was given outline planning approval earlier this year.

Our concerns about the proposed plan in respect of Gullane are in the attached supporting document, shown with the relevant references to Scottish Planning Policy and Strategic Development Plan (and the forthcoming revision of it, the Proposed Strategic Development Plan). In some cases the Plan also appears to be internally inconsistent, and we also highlight this.

We could see no evidence from the proposed LDP that a cumulative assessment of impacts on Gullane or beyond Gullane had been conducted across all four sites. It appears that individual sites had been considered (although in the case of Saltcoats with inadequate consideration of wider impacts) and that higher level assessment had been conducted on the Compact and Dispersed options, and on areas with the obvious major impact of a location such as Musselburgh. This has led to ignorance of the wider impacts and to a set of proposals for Gullane that would be bad planning. In our opinion this falls short on some 14 different areas, as set out in the attached supporting document.

Looking across the three main villages in our area (Gullane, Aberlady and Dirleton) it is clear that issues relating to vehicle traffic (and parking) are seen as being low priority. In part this is compounded by the total lack of progress on Conservation Area Appraisal and Management. Commitments were made to this in the 2008 local development plan, but no progress has been made and thus there is no benchmark against which to assess the impacts of the over-development now being proposed. A half-hearted commitment is made in the proposed LDP to addressing this lack of progress, but it does not appear in the draft Action Programme and should therefore be viewed with scepticism.

In addition, the zoning of NK7, NK8 or NK9 prior to the delivery of the major brownfield site at the Fire Service college site (NK6) would be contrary to the objectives of the proposed LDP on page 9. The zoning of any of these sites for development in this proposed plan should be removed until after NK6 has been delivered.

ACTION Sought No 1: *Retain NK6 and remove NK7 and NK8 in that order (which order corresponds to the volume of objections lodged for the premature applications)*

The wording for the Fire Service college site (NK6) regarding C111 should be removed. The connection to the C111 was strongly opposed during the application for outline planning permission 15/007600/PPM. It was excluded from that proposal, was not highlighted by the Council Officials in their report and was not included as a condition of the approved application.

ACTION sought No 2: *Remove the reference to the C111 from the description of site NK6 on page 54 or change the wording from 'must' to 'must not'.*

The entry for the Castlemains site in Dirleton (NK11) on page 55 does not mention, under constraints, that the views from Dirleton 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, and, consequently may be ignored by developers.

We also note that in practice the proposed number of houses at "circa 30" may be overstated given the need to mitigate noise, landscape and visual impacts.

Further, we note that since the proposed LDP was approved by the Council on 6 September applications for planning permission have been lodged for a development of 24 houses at Foreshot Terrace, Dirleton and for associated drainage provision (no 16/00710/PM and 16/00711/P respectively). We believe that these applications should be refused on the following grounds:-

(a) the sites have not been designated for housing in the proposed LDP;

(b) in terms of the Housing Land Supply: Interim Planning Guidance approved by the Council on 23 February 2016 preference should be given to the site at Castlemains Place, Dirleton designated in the proposed LDP as suitable for housing; the development of both the Castlemains Place and Foreshot Terrace sites for housing would be unsustainable in view of the limited infrastructure available in the village, including a lack of places at Dirleton Primary School;

(c) the sites at Foreshot Terrace form part of an area along the whole of the northern edge of Dirleton which is subject to the Countryside Around Towns policy as set out in Technical Note 8 which accompanies the proposed LDP; and

(d) the proposals conflict with the Dirleton Conservation Area Statement in that they will interrupt the views of Dirleton and Dirleton Castle on the approaches to the village from the east (on the A198) and the north east (Ware Road) and with the setting of Oatfield House;

Action sought No 3: *Include reference to protecting the eastern setting of Dirleton Castle and the views both from the castle and its designed landscape and do not redesignate land at Foreshot Terrace, Dirleton for housing.*

Regarding Gullane Primary School, the land to the south of the school should be earmarked for education and should be treated in a similar way to the Whitecraig Primary School land and have designation SECF1. This should be treated as related to, but separate from, the Saltcoats (NK7) site.

ACTION Sought No 4: *Treat the land south of Gullane primary school as a site earmarked for future expansion of the school and give it designation SECF1.*

The proposed LDP pays particular attention to football provision in Gullane, despite a significant current provision, and the existing need for rectification by the Council of the damage to drainage when it implemented a skateboard park. The inclusion of this appears to have been 'an easy option'. We believe the priority should rest with the provision of winter/adverse weather community facilities. This has not been assessed. It needs to be if NK7 and NK8 are retained.

ACTION Sought No 5: *The provision for community facilities usable in winter/adverse weather conditions should be assessed and an appropriate solution be proposed, with developer contributions earmarked for them. Specific references to football provision should be removed from NK6.*

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. This too has not been addressed.

ACTION Sought No 6 : *This should be addressed as part of the Castlemains development (NK11).*

The statements about North Berwick area Infrastructure (page 52) ignore the capability of the Gullane Waste Water Treatment Works (WWTW) and its associated pollution of Yellowcraig beach, near Dirleton. As well as being expanded, the WWTW needs to have secondary treatment added to it as a matter of priority, and certainly before any further development is undertaken in Aberlady or Gullane.

ACTION Sought No 7: *Any development in Aberlady or Dirleton will be conditional upon the expansion and introduction of secondary treatment at the Gullane WWTW.*

The proposal T9 as it relates to Drem is wholly inadequate, and especially so if the sites NK7 and NK8 are included. We would ask that this be rethought.

ACTION Sought No 8

Rethink the scope of proposal T9 as it relates to Drem.

The proposal T13 has no place in a credible plan. It is entirely aspirational, unfunded and speculative. Its inclusion reduces the credibility of the plan.

ACTION Sought No 9

Remove proposal T13.

We note the remarks in the Proposed Local Development Plan regarding the Transport Network, Infrastructure Fund and Modelling to support decision-making. We understand the need to manage traffic at the major bottlenecks on the overall road network. We see no evidence of an appreciation of the traffic through the rural road network, including locations such as Aberlady, Gullane, Ballencrieff, Drem or West Fenton and we are surprised that they merit no intervention, given the scale of the proposed developments. We would urge the Council to provide some robust and credible evidence that no action is needed or put forward appropriate interventions.

ACTION Sought No 10

Seek an independent expert assessment of the state of the rural road network with a baseline of its current state and adding proposed future developments, and identify further interventions if required.

Proposed LDP – Technical Note 1 – Planning for Housing

We note that at least three of the Gullane sites are controlled by CALA. They previously indicated that they would roll out housing on their sites at two houses per month. This statement (which could be marketing related) and the apparent extent of their commitments elsewhere in East Lothian is slower than the presumed build out shown in the Technical Note.

ACTION Sought No 11: *Reassess the build out numbers for Gullane*

Proposed LDP – Technical Note 8 - Countryside Around Towns

- a) Gullane – in the event of the Fenton Gait East site not being zoned for development we believe it should instead be given DC8 status given that this sits perfectly with its location relative to the other DC8 zoning
- b) Dirleton – 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, indicates that the planning authority’s design intention for the southern edge of the Castlemains site is to strengthen its ‘urbanisation’ to form a new modern housing edge closer to the bypass. This is 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.

ACTION Sought No 12: *If NK8 is removed as a site give it DC8 Status*

ACTION Sought No 13: *Reword the description for Dirleton on pages 15&16 by deleting the reference to creating a new urban edge, and point 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.*

Section 2 – Proposed LDP – Draft Environmental Report

We note that no cumulative impact assessment has been conducted across the four proposed development sites in Gullane, nor of their impact outside Gullane.

Section 3 – Proposed LDP – Action Programme

We have already highlighted the inadequacy of proposal T9 in respect of Drem. On the basis proposed it is misleading to include it under ‘Major Infrastructure Proposals’. The wording should be qualified to show that this Drem intervention is minor or trivial in its scope.

ACTION Sought No 14

Qualify wording about Drem parking.

The proposal T13 has no place in a credible plan. It is entirely aspirational, unfunded and speculative. Its inclusion reduces the credibility of the plan.

ACTION Sought No 15

Remove proposal T13.

The Action Programme should include Conservation Area Appraisals and Management Plan development, otherwise there can be no confidence that progress will be made (as has been the case for the last 8 years). [see 6.4.4 of Proposed LDP] The statements regarding action on these matters set out in paragraph 6.44 of the proposed LDP are too vague.

ACTION Sought No 16

Include development of Conservation Area Appraisal and Management plans for our Conservation areas.

Section 4 – Proposed LDP – Affordable Housing and Tenure Mix

In Aberlady in particular the community has welcomed the provision of affordable housing within the proposed Aberlady West development. We urge ELC to ensure that the 25% allocation on this site is computed by reference to the number of bedrooms that are made available, rather than the number of dwellings. We also suggest that 50% of the affordable housing should be made available as rental properties.

ACTION Sought No 17

Review basis of affordable housing in the Aberlady site (NK10).

Section 5 – Proposed LDP – Draft Development Briefs

A number of changes are sought to the Development Brief for Saltcoats (NK7)

ACTION Sought no 18

- a) NK7 should include the following rural design principles for C111 should that proceed
- There should be no detriment to walking, cycling and horse traffic
 - Priority should be given to these vulnerable users
 - The character of the route should be protected
 - Change should provide a net gain to the amenity provided by the route
 - Natural features should be used to calm traffic rather than invasive engineering

- b) NK7 should make no reference to the John Muir Way – the John Muir Way could have been routed in this way for any of the last 10 years, but has not been, because it is entirely right and proper that it is routed through Gullane, past its facilities including cafes.
- c) NK7 appears to have some information missing about it eg regarding item 6

A change is sought to the Development Brief for Fenton Gait East (NK8)

ACTION Sought no 19

- a) NK8 makes no mention of the issue regarding no 9 and direct access to the C111. Our understanding is that there is a legal dispute whose resolution would be needed before any development. Ref no 1, there is an issue because any path on the south side of the A198 would overlook the Muirfield Steading in an unacceptable way.

A number of changes are sought to the Development Brief for Aberlady West (NK10)

ACTION Sought no 20

- a) Access to the development from the A198. The long straight into the village from the west already encourages speeding and raises traffic safety issues, with a fatality only last year. The existing junction with the Pleasance is already a hazard. A significant increase in the number of children crossing the A198 at this point to catch the school bus to N Berwick High must be anticipated. The community has suggested a number of ways to mitigate the increased risks that this junction would pose, including: a roundabout; extending the 30mph speed limit to beyond the Gosford Bothy junction; improving signage; installing a pedestrian crossing. We ask the Council to take them into account in the brief.
- b) Traffic flows along the Mair. This is single lane, without footpaths. It is much used by pedestrian traffic, particularly children accessing the play area and the woods to the south of the village. Again, the community has suggested a number of ways to preserve the rural character of the Mair, to prevent any increase in traffic usage and to mitigate the risks arising therefrom. We ask the Council to adopt their recommendations in respect of signage, footpaths and traffic calming measures into the developer brief.
- c) Wider pedestrian and cycle path network. In order to mitigate the likely increase in motor traffic to Longniddry station, the community have asked that the developer and ELC explore the feasibility of such a path through the Gosford Estate. We ask the Council to take this into account in the developer brief.

A number of changes are sought to the Development Brief for Dirleton (NK11)

ACTION Sought no 21

- a) We welcome particularly the requirement for a village green in the North West corner of the site. This will fit in especially well with the pattern of greens in the historic part of the village.

We believe that it needs to be 110m long from the boundary of Castle mains farm to adequately protect the castle setting and the views from the castle, with a large clump of extra heavy trees or a woodland strip along the housing edge.

b) We also welcome the requirement for a linear open space along the northern boundary, connecting westwards to the new village green, through which we presume the proposed footpath will run.

However, we would also like to see it continued eastwards by the removal of the existing beech hedge (but not the trees) along the full length of Castle mains Place, so that the linear open space then reads as running East-West all the way from Station Road, giving an ideal 'safe route to school' for children.

Views along this E-W open space will also align with and be framed by the buildings onto the castle, as required in the brief. Replacement planting is covered in 5.3 below.

c) **We strongly advocate that a requirement for the developer to provide a 30 metre wide woodland belt with a footpath 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 5.5 below.

d) **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 could appoint a woodland contractor to plant the woodland and to maintain it for 10 years under an agreed woodland plan, managed by the Trust.**

e) It is now apparent from the CALA application's noise assessment document that parts of the development will exceed the guidelines for noise control. Ineffectual amelioration proposals are made with regard to glazing, soft surfaces and high solid boarded boundary fencing. The latter would, in any case, be wholly inappropriate for a conservation area.

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. We would recommend a line on the site design brief plan to indicate a noise impact zone within which houses should not be located.

f) **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.

g) 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 hollow planted and screened with wetland trees.

Section 6 – Proposed LDP – Supplementary Guidance – Draft Developer contributions Framework

We note that the basis for developer funding for school places is made even more opaque by the approach used for allocation. We believe that the level of funding proposed severely understates the need.

ACTION Sought no 22

Seek an independent expert assessment of the level of funding as it takes account of numbers of children for new housing from recent past experience.

Yours faithfully

J D Findlay
Chairman
Gullane Area Community Council
email jeremyfindlay@btinternet.com

GULLANE AREA COMMUNITY COUNCIL
(Representing Aberlady, Dirleton, Drem and Gullane)
www.gaddabout.org.uk

Chairman: J D Findlay
The Coach House
Goose Green Road
Gullane
East Lothian EH312BA

?? October 2016

Assessment of Overall Suitability of Sites in Proposed Local Development Plan - GULLANE

A. Sustainability

The SPP states that there is a presumption in favour of sustainable development.

28. The planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term. The aim is to achieve the right development in the right place; it is not to allow development at any cost.

29. This means that policies and decisions should be guided by the following principles:

- giving due weight to net economic benefit;
- supporting delivery of accessible housing, business, retailing and leisure development;
- supporting delivery of infrastructure, for example transport, education, energy, digital and water;
- protecting, enhancing and promoting access to cultural heritage, including the historic environment;
- protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment;
- avoiding over-development, protecting the amenity of new and existing development

The proposed plan for Gullane is not sustainable. It proposes a programme of building in an area that has poor access to employment and services as documented in the Transport Technical Note version 3.0 of 27/09/2011 produced for the SESPlan at <http://www.sesplan.gov.uk/assets/files/docs/proposed-plan/technical/Transport%20Technical%20Note.pdf>

Access will primarily be via lengthy commuting by car (see H below). It also compromises a plethora of future economic opportunities that should grow faster as Edinburgh City Region grows and it and its visitors demand more high quality tourist, leisure and recreation activities. Gullane is at the epicentre of the golfing universe (4 golf courses that start from it and 4 others a few minutes' drive away) and extensive beaches, cycling, walking and horse-riding opportunities all with an ancient conservation area at its centre. It contains part of the increasingly popular John Muir Way. It has the embryonic Pilgrim Way towards Lindisfarne and the Catriona Way, part of the European Cultural Way 'In the Footsteps of Robert Louis Stevenson'. It was the biggest tourist attractor in East Lothian in 2015. Future opportunities will be ruined by needlessly compromising the use of its outstanding conservation area other than as a parking lot for local shopping and services through the growth of numbers of 'local' people too far away to walk to it. It is also an over-development (see B below) and will have a major negative effect on the amenity of local people (see J, L & M below). ***The development is contrary to SPP 28 and 29. And there are other sites that meet these criteria better.***

B. Over-development

In SPP 29 This means that policies and decisions should be guided by the following principles:

- avoiding over-development, protecting the amenity of new and existing development

Figure 1 of the spatial strategy of the SDP states 'modest additional growth of existing settlements outside SDAs. Its para 50 states 'The East Coast experiences significant pressure for housing growth and, in the absence of a more diverse employment base, many residents commute out of the area to access the wider range and choice of jobs, as well as goods and services. This has resulted in less sustainable commuting and travel patterns and restricted access to affordable housing.' Local Development Plans will direct further strategic development to the following Strategic Development Areas.....' Its Policy 1A highlights the Spatial Strategy Locations for Development including the Strategic Development Areas within East Lothian

Gullane is amongst the least accessible settlements as documented in the Transport Technical Note version 3.0 of 27/09/2011 produced for the SESPlan. Gullane is outside any Strategic Development Area [SDA] or Long Term Growth Corridor [draft of Proposed SDP]. In the SDP, choices for SDAs were guided primarily by transportation related reasons. The developments proposed for Gullane would encourage less sustainable commuting and travel patterns (see H below). The SDP states that developments outside an SDA should be 'modest'. The Gullane development would not be 'modest' [modest should be less than 2ha which is classed as 'major' according to 2009 No.51 Town and Country Planning (Hierarchy of Development)(Scotland) Regulations 2009]. The Fire Station site (NK6), Saltcoats (NK7) and Fenton Gait East (NK8) are all major developments. The sheer scale of around 30% growth across all sites shown for Gullane is excessive. The ELC Spatial Strategy is stated to be concentrated in the more accessible west of the County. However based upon Census 2011 figures this is far from the case with the proposed level of concentration in Gullane being greater than the other locations in the west of the county. This also makes it conflict with the ELC stated spatial strategy and will put excessive pressure on local services and facilities (see C, D, L, M) below. ***The development is contrary to SPP 29, to the spatial strategy of the SDP and its Policy 1A, and to the Proposed SDP.***

C. Cumulative Impact on the Gullane Conservation Area

In the SPP 37. The Government's policy statement on architecture and place for Scotland, Creating Places, emphasises that quality places are successful places. It sets out the value that high-quality design can deliver for Scotland's communities and the important role that good buildings and places play in promoting healthy, sustainable lifestyles; supporting the prevention agenda and efficiency in public services; promoting Scotland's distinctive identity all over the world; attracting visitors, talent and investment; delivering our environmental ambitions; and providing a sense of belonging, a sense of identity and a sense of community. It is clear that places which have enduring appeal and functionality are more likely to be valued by people and therefore retained for generations to come.

In the SPP regarding Conservation Areas - 143. 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. Proposals that do not harm the character or appearance of the conservation area should be treated as preserving its character or appearance.

In the SPP Planning should support development that is designed to a high-quality, which demonstrates the six qualities of successful place.

- Easy to Move Around and Beyond

46. This is development that considers place and the needs of people before the movement of motor vehicles. It could include using higher densities and a mix of uses that enhance accessibility by reducing reliance on private cars and prioritising sustainable and active travel choices, such as walking, cycling and public transport.

And in the Proposed LDP - POLICY T2: GENERAL TRANSPORT IMPACT

New development must have no significant adverse consequences for:

- road safety;
- the convenience, safety and attractiveness of walking and cycling in the surrounding area;
- public transport operations in the surrounding area, both existing and planned, including convenience of access to these and their travel times;
- the capacity of the surrounding road network to deal with traffic unrelated to the proposed development; and
- residential amenity as a consequence of an increase in motorised traffic.

The cumulative effect of adding further areas with no reasonable access to local facilities other than by car and inevitably demanding space for parking in the small conservation area, will have an incremental and significant cumulative effect on the appeal and value of

the Conservation Area. It is not clear how such parking could reasonably be provided. In the 2008 LDP ELC stated that, in time, each Character Statement will be replaced by a more comprehensive Conservation Area Character Appraisals. None have been produced in the intervening 8 years. No appraisal has been produced for Gullane and therefore there is no effective management plan and this ignores best practice as set out in PAN71. The gradual conversion of the green areas to parking is obvious to anyone familiar with the evolution of them over the last decade. The additional parking demands will also have an impact on road safety particularly for children amongst manoeuvring vehicles for the increasingly awkward parking in the Conservation Area.

The development is contrary to SPP 37 and SPP 143 SPP 46 and proposed LDP T2.

D. Facilities not located to minimize travel

In SPP 46 Planning should support development that is designed to a high-quality, which demonstrates the six qualities of successful place.

- **Easy to Move Around and Beyond**

46. This is development that considers place and the needs of people before the movement of motor vehicles. It could include using higher densities and a mix of uses that enhance accessibility by reducing reliance on private cars and prioritising sustainable and active travel choices, such as walking, cycling and public transport

Existing facilities within Gullane are all at the opposite end of the village, within the Conservation Area, and more than 400m away from all these houses. Even the simplest errand, particularly from Saltcoats (NK7) will demand a car journey. ***This is contrary to SPP 46.***

E. Prejudice of Brownfield Site Delivery and of 5 Year Supply assumptions

In SPP 40 This requires spatial strategies within development plans to promote a sustainable pattern of development appropriate to the area. To do this decisions should be guided by the following policy principles:

- considering the re-use or re-development of brownfield land before new development takes place on greenfield sites;

In 17 of the SDP it states the aim of 'promote the development of urban brownfield land for appropriate uses'

In SPP 110. The planning system should:

- identify a generous supply of land for each housing market area within the plan area to support the achievement of the housing land requirement across all tenures, maintaining at least a 5-year supply of effective housing land at all times;

In the Proposed LDP Vision and Aims

To make efficient use of land, buildings and infrastructure, prioritising the development of previously developed land over greenfield land where appropriate, while recognising that the nature of East Lothian and the scale of strategic development requirements will likely require significant amounts of greenfield land, including prime quality agricultural land, to be used;

In the case of Gullane, CALA control the 3 largest sites [Fire Station (understood to be controlled by CALA), Saltcoats and Fenton Gate East], and have stated at the Community Council that there would be a roll-out of 2 houses per month across their sites, matching their delivery capability and market appetite. Given a 'monopoly' of the main sites they are likely to give priority to green-field development at a pace and of a type that maximises profit. Priority should instead be given to the brownfield site, and its delivery would take the next 5 years at least. No other sites should be allocated now and the position should be considered further once it has been delivered, otherwise a) Brownfield delivery will be compromised and b) 5 years' supply will be distorted and misstated (under the mistaken belief that more volume will be delivered sooner than it will be). Additionally, the benefit of feedback may allow better decisions to be made in respect of future development should

that be needed. ***To do otherwise will be contrary to SPP 40, SPP 110, SDP 17 and proposed LDP Vision and Aims.***

F. Saltcoats has no viable access to public transport, and for the other sites it is limited

In SPP 270 - The planning system should support patterns of development which:

- optimise the use of existing infrastructure;
- reduce the need to travel;
- provide safe and convenient opportunities for walking and cycling for both active travel and recreation, and facilitate travel by public transport;

In SPP 287 - Planning permission should not be granted for significant travel-generating uses at locations which would increase reliance on the car and where:

- direct links to local facilities via walking and cycling networks are not available or cannot be made available;
- access to local facilities via public transport networks would involve walking more than 400m;

In the SDP – Policy 8 - TRANSPORTATION

The Local Planning Authorities in collaboration with Transport Scotland and SEStran will support and promote the development of a sustainable transport network. Local Development Plans will:

- a. Ensure that development likely to generate significant travel demand is directed to locations that support travel by public transport, foot and cycle;
- b. Ensure that new development minimises the generation of additional car traffic, including through the application of mode share targets and car parking standards that relate to public transport accessibility;
- c. Relate density and type of development to public transport accessibility;
- g. Ensure that the design and layout of new development demonstrably promotes non-car modes of travel

And in the LDP - POLICY T2: GENERAL TRANSPORT IMPACT

New development must have no significant adverse consequences for:

- road safety;
- the convenience, safety and attractiveness of walking and cycling in the surrounding area;
- public transport operations in the surrounding area, both existing and planned, including convenience of access to these and their travel times;
- the capacity of the surrounding road network to deal with traffic unrelated to the proposed development; and
- residential amenity as a consequence of an increase in motorised traffic.

And in the LDP - POLICY T1: DEVELOPMENT LOCATION AND ACCESSIBILITY

New developments shall be located on sites that are capable of being conveniently and safely accessed by public transport, on foot and by cycle, as well as by private vehicle. Exceptions to this general policy will only be considered where there is a specific operational requirement for a location that does not meet the terms of this policy, or where there are overall planning benefits to be gained.

In the case of Gullane it is served by Drem station (nearest) and Longniddry. Both of these stations have parking that is full already. Any additional traffic to these will greatly inconvenience existing users by leaving them unable to park. The Saltcoats site (NK7) is greater than 400m away from any public transport making it non-viable. In the unlikely event of anyone trying to use the bus service for commuting it is problematic, taking at least an hour to just reach Edinburgh and not readily connected to more local train services. People living in Gullane of working age will typically commute to Edinburgh by car, and additional housing will simply generate a large number of extra car journeys on the increasingly congested roads. ***This is in contrary to SPP Policy 270, SPP Policy 287, SDP Policy 8 and Proposed LDP Policy T2 and Policy T1.***

G. Impact on views of Saltcoats Castle, a Scheduled Monument

In SPP 145 - Where there is potential for a proposed development to have an adverse effect on a scheduled monument or on the integrity of its setting, permission should only be granted where there are exceptional circumstances. Where a proposal would have a direct impact on a scheduled monument, the written consent of Scottish Ministers via a separate process is required in addition to any other consents required for the development.

The views of Saltcoats Castle from the East will be seriously impacted by the Saltcoats site (NK7). ***This is contrary to Policy SPP 145.***

H. Impact on Greywalls – Listed Building

In SPP 141 - Change to a listed building should be managed to protect its special interest while enabling it to remain in active use. Where planning permission and listed building consent are sought for development to, or affecting, a listed building, special regard must be given to the importance of preserving and enhancing the building, its setting and any features of special architectural or historic interest. The layout, design, materials, scale, siting and use of any development which will affect a listed building or its setting should be appropriate to the character and appearance of the building and setting. Listed buildings should be protected from demolition or other work that would adversely affect it or its setting.

In Proposed LDP POLICY CH7: GREYWALLS, GULLANE

Development that harms the landscape setting of Greywalls and its associated Designed Landscape will not be permitted.

We cannot tell from the information about the Fenton Gait East site (NK8) whether there is a material impact on the view from any part of the Greywalls site. This will need to be confirmed. ***This may be contrary to Policy SPP 141 and proposed LDP Policy CH7.***

I. Impact on B Listed Buildings Context at West Fenton

In SPP 141 - Change to a listed building should be managed to protect its special interest while enabling it to remain in active use. Where planning permission and listed building consent are sought for development to, or affecting, a listed building, special regard must be given to the importance of preserving and enhancing the building, its setting and any features of special architectural or historic interest. The layout, design, materials, scale, siting and use of any development which will affect a listed building or its setting should be appropriate to the character and appearance of the building and setting. Listed buildings should be protected from demolition or other work that would adversely affect it or its setting.

Given the major impact on the roads through West Fenton it appears that it would be vital to provide pavements through the entire area, to allow safe passage of pedestrians including children at primary school during and after the development works. If it were feasible at all, and we cannot see how it would be, this would turn West Fenton from the remnants of a historically important Ferm Toun with many B listed buildings, into an urban suburb of Gullane, ruining their setting. ***This is contrary to Policy SPP 141.***

J. Impact on Amenity and Safety of Users of the lane from Gullane to and through West Fenton

In SPP 270 The planning system should support patterns of development which:

- optimise the use of existing infrastructure;
- reduce the need to travel;
- provide safe and convenient opportunities for walking and cycling for both active travel and recreation, and facilitate travel by public transport;

In LDP T2 - POLICY T2: GENERAL TRANSPORT IMPACT

New development must have no significant adverse consequences for:

- road safety;
- the convenience, safety and attractiveness of walking and cycling in the surrounding area;
- public transport operations in the surrounding area, both existing and planned, including convenience of access to these and their travel times;
- the capacity of the surrounding road network to deal with traffic unrelated to the proposed development; and
- residential amenity as a consequence of an increase in motorised traffic.

The lane from Gullane to West Fenton is used by pedestrians (including to and from the Livery and Riding for the Disabled), horses, cyclists, runners. These vulnerable users value its peacefulness, views and countryside context. Much of it is little more than 4m wide, in some places narrower, some of it with high hedges with no escape onto a verge. The increase in traffic, in particular from Saltcoats (NK7) but not limited to it, both during and after the development works will have a serious detriment on the users of this lane and damage to road safety. It will have a significant impact on the attractiveness of the route for all these users. For all these vulnerable users the lane will become unusable. It will be a vehicle route. Anyone familiar with Tom-Tom, Garmin, Google Maps etc will know that

there is currently little difference between journey times going north or south if heading to Drem or to Edinburgh from a location such as Saltcoats (NK7). The addition of a barrage of traffic calming going north, the extra traffic generated from the Fire-station site (NK6), Fenton Gait East (NK8), other new downstream sites in North Berwick and along the A198 make it obvious that the vast majority of traffic will go south unless it needs to do an errand in Gullane first. In addition there may be major additional impact from construction traffic and issues related to routes and facilities for service vehicles. ***This is contrary to Policy SPP 270 and proposed LDP T2.***

K. Cumulative Impact on Sewerage

In proposed LDP - POLICY DEL1: INFRASTRUCTURE AND FACILITIES PROVISION

New development will only be permitted where the developer makes appropriate provision for infrastructure and community facilities required as a consequence of their development in accordance with Scottish Government Circular 3/2012 or any revision. Any necessary provision must be phased as required with the new development. Planning conditions and/or legal agreements will be used as appropriate and required to secure any necessary provision from developers, which could include land and/or a capital contribution.

The cumulative effect of sites at Aberlady and Gullane will exceed the capacity of the sewerage facility at Gullane WWTW. This will require a significant upgrade and additionally, given its increased scale and the fact that it currently only provides primary treatment (which is the likely reason that tidal effects give rise to failure of EU water standards at Yellowcraigs) it should have secondary treatment added to it. The requirement for this is not identified within the Proposed Local Development Plan. ***Failure to provide for this would be contrary to proposed LDP Policy DEL1.***

L. Cumulative Impact on Community Facilities

In proposed LDP - POLICY DEL1: INFRASTRUCTURE AND FACILITIES PROVISION

New development will only be permitted where the developer makes appropriate provision for infrastructure and community facilities required as a consequence of their development in accordance with Scottish Government Circular 3/2012 or any revision. Any necessary provision must be phased as required with the new development. Planning conditions and/or legal agreements will be used as appropriate and required to secure any necessary provision from developers, which could include land and/or a capital contribution.

The cumulative effect of the developments in Gullane will exceed the capacity of the Village Hall, and potentially other facilities such as the Gym and Tennis Courts. The proposed LDP includes developer contributions towards football related improvements, but our understanding is that these are largely in hand anyway or are dependent upon due maintenance by the Council. ***Failure to provide for this would be contrary to proposed LDP Policy DEL1.***

M. Cumulative Impact on School and Medical Facilities

In SPP 40 - Planning should direct the right development to the right place.

40. This requires spatial strategies within development plans to promote a sustainable pattern of development appropriate to the area.
• locating development where investment in growth or improvement would have most benefit for the amenity of local people and the vitality of the local economy.

The large scale growth of the village will severely impact the provision of high quality school facilities at the Primary School and facilities at the Medical Centre. Recent housing developments in Gullane have resulted in an average of 1 primary school pupil per new

build house. The ELC basis of 0.5 is half the level of recent past experience. During the first three years of the most recent local housing developments, Gullane Medical Practice had the highest birth rate per capita in East Lothian and the highest proportion of over 65 years old patients. Adding more houses will just add to the pressures. This will provide a negative benefit to local people. ***This is contrary to SPP policy 40.***

N. Mitigation of Development Impact

In SPP 291 Consideration should be given to appropriate planning restrictions on construction and operation related transport modes when granting planning permission

As part of the conditions for development on these sites, ELC will need to impose conditions that mitigate the effect of the development on Gullane and its inhabitants. This will need to include conditions to mitigate the impact of the village to operate in a functional manner over a prolonged period. This prolonged period will also have major impacts upon the phasing and deliverability of additional services required by the scale of development (such as school extensions, road improvement measures, additional parking etc). There will also be significant impact on tourist related activities. CALA have already shown an unwillingness to listen to the Community Council input during pre-application discussions and this does not inspire confidence in mitigation of the effects. No mention is made of it in their Transport Statement for their premature applications regarding the impact of site construction. Given the issues with the West Fenton Road we believe they needed to be. ***This may be contrary to SPP policy 291.***

From:
To: [Local Development Plan](#)
Subject: Objection - EL Local Development Plan
Date: 01 November 2016 09:30:37

Objection to the East Lothian LDP

I would like to object to ELC's proposed Local Development Plan for Gullane - in particular to the development at Fenton Gait East, Fenton Gait South and Saltcoats.

What the LDP for is proposing for Gullane seems very much over the top for the local services we have and allows multiple greenfield development before the readily available brownfield site at the redundant Fire School is developed.

Facilities/Infrastructure

The proposed developments are totally out of scale for the size, facilities and infrastructure of Gullane and the local area. The addition of around 350 houses brings circa 600 adults and 500 pre-school and school children. This increase in population would cause pressure on

- Gullane Nursery Schools
- Gullane Primary School
- Gullane Medical Centre
- Local, North Berwick, High School
- Recreational facilities

All which are above or at their maximum capacities, with no plan to deliver the required extra capacity is in place

Commuting/Transport/Roads

The majority of the incoming adults would have to commute to work, as local employment is restricted and does not offer the outlets for professionally qualified people. With around 600 adults will come getting on for 600 extra vehicles - vehicles needed to commute to the station, shops, schools, medical centre and work.

The local infrastructure for moving around the County is totally inadequate for the proposed increase - as it is somewhat above capacity today.

- The roads around Gullane and especially the proposed development area are inadequate for that increase in capacity.
- The narrow road to West Fenton (C111) is unsuitable for further traffic - it is heavily used by walkers, joggers and for horse riding - an increase in motorised traffic would not be in the best interest and would indeed add to accident levels. for all the proposed new housing - especially the greenfield sites - It would become the main thoroughfare to Drem Station for those commuting to Edinburgh as well as those wanting to access the main coastal road (A198).
- The public buses are restricted - though there is a regular route to North Berwick one way and to Edinburgh the other way, the Edinburgh journey is slow - transport to get around East Lothian to the County Town or other places is very restricted, meaning cars would be the preferential choice.
- The train is inadequate - Drem station car park is full now days, never mind when the increase from the LDP takes place. There is no public transport

and no suitable safe cycle route to Drem station. The only suitable way is by car.

- The commuter time trains cannot cope with volumes today - never mind with many extra commuters from the development.

Greenfield/Brownfield

The consequence of building on a greenfield site, out-with the current village building boundary, will not only lead to the loss of high-quality agricultural land but also an area that is an important wild life habitat. And once lost neither can be replaced.

It was only two weeks ago that prime agricultural land that the proposed Saltcoats development will be built on, was the home of the European Ploughing Championships - a competition promoted and supported by EventScotland and East Lothian Council and attended by competitors from all over Europe!

No greenfield development should be contemplated until the brownfield fire Schoo site is completed

Summary

The proposed developments for Gullane are beyond reasonableness - leading to a 30% increase to the size of Gullane; 350 properties, around 1000 people, around 600 cars, around 500 pre-school and school age youngsters and the consequential large increase in journeys for shopping, school and commuting.

When one adds developments at Dirlton and the on-going large increase in housing in North Berwick - the whole infrastructure of the east of East Lothian is under pressure to cope. And no joined up solutions have been proposed.

There should be no development of greenfield sites contemplated by ELC until the brownfield sites have been developed and completed and the needed increase in the infrastructure and public transport delivered.

Without due care the whole attraction of East Lothian, and particularly Gullane and its conservation area, for tourism and recreation will be damaged - and other than agriculture these are the main sources of employment for those who make their living locally - this would be eroded by the over development.

It's difficult enough in current times to - it will be impossible in future if this goes ahead.

Peter Wright

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

From:

YVONNE ADDISON

Date: as postmark

East Lothian: Proposed Local Development Plan

I am writing in response to proposed Local Development Plan and in particular the land that has been referenced as EGT1 (Former Cockenzie Power Station) in the plan.

The area shown on the map accompanying the Local Development Plan (inset Map 32) extends well beyond the site of the former Cockenzie Power Station. The majority of this land is currently designated in the East Lothian Local Plan 2008, as Countryside (DC1) or Public Open Space (C3). The land associated with power generation extends to the areas of land covered by the main power station building, transformer building, coal plant and the coal conveyor buildings. This is the site allocated in the adopted 2008 local plan and previous local plan as NRG1.

I consider this re-allocation of Countryside and Public Open Space to be incorrect and inappropriate,

The proposed changes are not a requirement of National Planning Framework 3 and appear to be seeking to extend the Power Station site beyond the current, clearly defined, boundaries. Policy EGT1 should be applied to the former Power Station site only and not to the surrounding land, which should retain its designation as Public Open Space and Countryside.

Development Locations (Spacial Strategy): The Preferred Approach of concentrating development in the west of the County risks removing much of the public and amenity land for the existing communities. The suggested concentration on large scale housing development is incompatible with the creation of a large potentially industrial site and port between Cockenzie and Prestonpans into the Forth. The likely form of any development at EGT1 that includes land that is currently countryside and open space around the footprint of Power Station would include energy related uses, manufacturing, servicing and potentially port related developments. These functions are not compatible with the dense residential strategy being proposed under the Plan or with the existing rural residential nature of the area.

Countryside and Open spaces: The proposed EGT1 would, if included in the Local Development Plan, remove much of the countryside and open space between these settlements, reducing amenity and dividing the existing settlements.

The site includes existing amenity land, a large portion of the Greenhills, public footpaths, cycle route 76, core paths, open countryside, part of the route of Scotland's 1st railway (Tranent to Cockenzie Waggonway) and a substantial part of the remaining undeveloped and core site of the Battle of Prestonpans.

I oppose the proposal to re-allocate existing Public Open Space and Countryside as part of the site of the former Cockenzie Power Station. I support appropriate mixed employment within the existing industrial footprint at the former power station site at Cockenzie, so long as it takes into consideration the residential areas adjacent to the site and the environment. This approach would be in accordance with the current National Plan.

My Comments:



Yours sincerely,

Signed: _____

Print: _____

YVONNE ADDISON

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

From:

Martine Robertson



Date: as postmark

East Lothian: Proposed Local Development Plan

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Countryside and Open spaces: The proposed EGT1 would, if included in the Local Development Plan, remove much of the countryside and open space between these settlements, reducing amenity and dividing the existing settlements.

The site includes existing amenity land, a large portion of the Greenhills, public footpaths, cycle route 76, core paths, open countryside, part of the route of Scotland's 1st railway (Tranent to Cockenzie Waggonway) and a substantial part of the remaining undeveloped and core site of the Battle of Prestonpans.

I oppose the proposal to re-allocate existing Public Open Space and Countryside as part of the site of the former Cockenzie Power Station. I support and propose appropriate mixed employment within the existing industrial footprint at the former power station site at Cockenzie, so long as it takes into consideration the residential areas adjacent to the site and the environment. This approach would be in accordance with the current National Plan.

My Comments: I do not want the re-allocation of countryside and public open space to go ahead. This is an attempt to simply put the plans already rejected before us again. The character and amenity aspect of the land would be seriously changed for the worse. Everything is being done to bully this community into a less good place to live.

Yours sincerely,

Signed: 

Print: MARTINE ROBERTSON

Chief Planning Officer
 Policy & Projects Development
 Partnership & Services for Communities
 East Lothian Council
 John Muir House
 Brewery Park
 Haddington
 East Lothian
 EH41 3HA

Date: - 30th October 2016
 Our Ref: - ()
 Your Ref: - LDP



Dear Sir,

Submission – Consultation regarding the Proposed Local Development Plan

I submit that the proposed Local Development Plan (LDP) for East Lothian should delete the following areas as sites for future housing development: -

- NK7 – Saltcoats
- NK8 - Fenton Gait East
- NK9 – Fenton Gait South.

I have considered carefully the LDP and make this submission. The clear and sensible option is the development of the Fire Training Station rather than extend beyond the current village boundaries by these three housing developments.

The development of the Fire Training Station will stress the Gullane village community. However, the accumulative effect of developing the three green field is of an even greater scale and, in my opinion, will have a permanent, highly damaging, effect on the existing Gullane community for the following reasons. They will: -

- permanently impair the character of Gullane village;
- present little employment prospects within the village after the construction phase. This will mean that the influx of people will require to commute outwith the Village;
- create intolerable pressures and safety issues on local transportation routes, particularly on the back roads around Gullane, parking at stations and in the Village centre;
- greatly exceed the available places at Gullane primary school;
- over-pressure the local medical and community facilities;
- overall the developments are not sustainable for the above reasons and will threaten the existing fabric and tourist

I have articulated the details of my reasons in individual letters of objection.

There should be a presumption to develop brown field sites first, such as the Fire Training Station. Even if there is the potential contamination of the site from its previous use, it should be

decontaminated (the cost be borne by the Scottish Government as the duty holder) and be developed as primarily affordable housing.

In my opinion, developers should be forced to develop brownfield sites that have already been given planning permission, such as Blindwells, before being given outline planning permission for more lucrative green field development sites outside the boundary of Gullane Village.

This is recognised quite correctly in the East Lothian Local Plan of 2008, at paragraphs 1.25 & 1.26: -

“Accordingly the local plan adopts a strategy that accommodates growth through managing change while retaining key assets.

This growth cannot continue to be wholly directed to existing communities, without changing their character or compromising their settings. The strategy of this local plan, one which is likely to be continued in subsequent plans, is to focus development in locations that do not compromise existing assets of value and where other benefits can be achieved. A proposed new settlement at Blindwells will play a major role in this respect ...”

In our opinion, Gullane is a key and highly valued asset to the coastal area of East Lothian and its character should not be destroyed. I trust that common sense prevails as recorded in the East Lothian Local Plan of 2008

Yours sincerely

Rod Sylvester-Evans