

## Members' Library Service Request Form

Date of Document	21/03/17
Originator	Iain Mcfarlane
Originator's Ref (if any)	
Document Title	Proposed East Lothian Local Development Plan - Representations to Proposed Local Development Plan

Please indicate if access to the document is to be "unrestricted" or "restricted", with regard to the terms of the Local Government (Access to Information) Act 1985.

Unrestricted	<input checked="" type="checkbox"/>	Restricted	<input type="checkbox"/>
--------------	-------------------------------------	------------	--------------------------

If the document is "restricted", please state on what grounds (click on grey area for drop-down menu):

For Publication
-----------------

Additional information:

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

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

For Office Use Only:	
Library Reference	31/17
Date Received	21/03/17
Bulletin	Mar17

## **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](http://www.eastlothian.gov.uk/meetings/meeting/5908/east_lothian_council)

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

For further information or advice, please contact:

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

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

From:

COLIN 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 (Spatial 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 1<sup>st</sup> 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: \_\_\_\_\_

COLIN ADDISON



Policy and Projects Development  
Partnership + Services for Communities  
East Lothian Council  
John Muir House  
Haddington  
EH41 3HA

29.10.2016



East Lothian Local Development Plan

I have already written to the Environment Dept about proposed new house building sites in Gullane.

- ① Saltcoats [ref 16/005514/PPM] my letter 29/08/2016. reply 01/09/2016.
- ② Fenton Gait East [ref 16/005587/PM] my letter 13/09/2016. reply 15/09/2016

In both these letters I stated that before building should be considered on any greenfield site the Brownfield site at the former Fire College be given priority before it becomes rundown and becomes an eyesore in the village.

It has now been drawn to my attention that a fourth site at Fenton Gait South is planned and if all these sites are given the go ahead Gullane will contribute 50% of all new sites from the North Berwick coastal area.

The cumulative impact on the village has not been properly assessed: -

- ① The school and medical facilities will not be able to cope with the large number of new residents.
- ② The access to public transport, especially the trains which are already overcrowded with inadequate parking at the stations will be a problem.
- ③ Rural roads were not built for the increase in volume of traffic particularly for daily commuters.

Please give consideration to local communities first, not to developers who are out to make as much profit as they can building expensive houses outwith the reach of many locals. Is this area to become Calabria?!

To protect Gullane from overdevelopment we need Saltcoats (NK7) and Fenton Gait East (NK8) and Fenton Gait South (NK9) to be removed from the proposed Local Development Plan and to keep the Brownfield site at the Fire College as the only one zoned for housing in Gullane. Projected figures for this site: - 125 houses, 216 extra vehicles, 140 extra school age children, 39 preschool kids and 125 extra commuters could be coped with without too much impact on the infrastructure and amenities of the area.

31<sup>st</sup> October, 2015

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

Dear Sirs,

**Re: Proposed new housing plan - East Saltoun**

I write in order to register my objection the above mentioned proposal, which alarms my wife and myself, and which I know is also of great concern to many East Saltoun residents.

The plan embodies a variety of ill-conceived elements and the potential for substantial changes in the East Saltoun conservation village environment. A plan which envisages increasing the number of houses in so small a place by almost 70% cannot avoid dramatically changing the character of the village, and the scale of this proposal clearly conflicts with the National Policy guidelines. This is a village which lacks a mains gas supply, shop, and adequate mobile telephone coverage (we rarely get a signal at all). We have sub-standard public transport available to us, and the nearest medical facilities are only reachable by car in the event of urgent need. In short, our local infrastructure is lamentably poor, and a 70% increase in housing stock would have an enormous negative impact on the limited facilities we have. Furthermore, the primary school could not cope with the implicit increase in demand for places.

We are also unimpressed by a plan which, according to the Main Issues Report clearly demonstrates that Dryden field is far from viable as a development site, scoring a paltry 5 viability scores out of a possible 19 scores. It also violates the concept of protection of prime agricultural land.

Yours faithfully,

Anthony J. Burnet



16064

19<sup>th</sup> of October 2016

Mr Iain McFarlane  
East Lothian Council  
John Muir House  
Haddington  
East Lothian  
EH41 3HA



Dear Mr McFarlane

**PROPOSED RESIDENTIAL DEVELOPMENT, ELPHINSTONE FOR HIGHLAND RESIDENTIAL DEVELOPMENTS**  
**DRAFT LOCAL DEVELOPMENT PLAN – REFERENCE TT11 ELPHINSTONE WEST**

With regards to the current consultation period on the emerging Local Development Plan 2016, this letter provides an update on the above project.

A design team has been appointed by Highland Residential Developments and a Proposal of Application Notice for the site was lodged on the 10<sup>th</sup> of August 2016. The Proposal of Application Notice was registered by East Lothian council on the 29<sup>th</sup> of August 2016 and a public event was held on the 28<sup>th</sup> of September 2016.

The public event was advertised in the local paper and a leaflet was provided to all properties in the village. The event was well attended by the local community with the comments / feedback received is being used to inform the design process.

The applicant and design team have met with Andy Stuart (East Lothian Council – Local Plan) to discuss the project and also attended meetings with the local ward councilors to inform them of the emerging design proposals. This has been combined with a presentation to the Tranent and Elphinstone Community Council and a village walk around with the local Elphinstone Community Association.

The intention is to lodge a detailed planning application for the site before the end of this year and the application will include a full suite of technical reports, detailed housing layout and Landscape Visual Impact Assessment. The planning submission will be for circa 80 to 90 units as per the local plan and hopefully this letter provides an overview of the current project status.

**ema** ARCHITECTURE+DESIGN Limited

CHARTERED ARCHITECTS


42 Charlotte Square, Edinburgh EH2 4HQ  
Tel : 44(0)131 247 1450  
[www.ema-architects.co.uk](http://www.ema-architects.co.uk)

Registered in Scotland No. SC256769  
Directors EC McIntyre, KG Ross, GK Kernohan, CJ Main

We would ask that the preferred site TT11 is retained in the emerging local plan during the current consultation process. Highland Residential Developments remain committed to delivering this site in the terms of the Local Plan allocation and look forward to engaging with East Lothian Council further once the planning application is lodged.

If you require any further update on the project, please do not hesitate to contact me on the details below.

Yours sincerely

  
**James Fraser**  
Associate Director  
**For ema Architecture + Design Limited**

**ema** ARCHITECTURE+DESIGN Limited

CHARTERED ARCHITECTS

42 Charlotte Square, Edinburgh EH2 4HQ

Tel : 44(0)131 247 1450

[www.ema-architects.co.uk](http://www.ema-architects.co.uk)

Registered in Scotland No. SC256769

Directors EC McIntyre, KG Ross, GK Kernohan, CJ Main



30<sup>th</sup> October 2016

Proposed Local Development Plan.

Dear Sirs,

There are some aspects of the Proposals, to which I wish to make objection and protest, as well as to make representation. There are 4 Main matters, namely

1) Housing Development.

What has happened in recent years and continues is the appalling sub-urban sprawl of 2/3 floor "boxes" along the lowland coastal belt from Musselburgh to North Berwick, with major reduction in green/open spaces apart from Golf Courses. Effectively, N. Berwick is almost a suburb of Edinburgh, yet it is 30 miles distant.

Housing developers appear to get opportunities on the easiest and most profitable sites, when much more direction from Scottish Council to Brown field sites, and inland is required. I suggest good planning should have allowed for major efforts along the length of the "ribbon" of the Tyne Valley from Pathead to Dunbar.

This would utilize much sloping ground giving the opportunity for multi-storey housing, and use of poorer ground to spread over wider areas, and give greater space for additional employment sites.



## 2) Employment.

New jobs are heavily required throughout the County to reduce "commuting" to Edinburgh, which from every angle seems to be more of a nightmare than anyone should have to face. The L.D.P. Summary Para 1.51 says "a further requirement of the S.D.P. is to maintain 76 Ha of Employment Land," and this is inadequate for the needs locally - again the Tyne Valley "ribbon" should be exploited more.

## 3) Tourism.

The existing proposals are likely increasingly to contribute to the withdrawal of the attraction of Lowland East Lothian to the large and important host of tourist visitors due to wrecking the very characteristics that attract visitors to the County.

## 4) Agriculture.

The prime land of Coastal East Lothian is scarce and is among the best in Scotland. Continuation of the sprawl on such high quality <sup>land</sup> may be easy to develop, but it is irreplaceable, and must not continue as an easy option. Having travelled abroad widely and observed housing and land development in many countries, I realize how unscrupulous E.L.C. is.

Finally, 300/400 years ago Edinburgh Old Town was created with many high rise buildings - why not E.L. Council now?

Yours faithfully,

J. M. STEVENSON  
D.L.

*Policies and Projects Development*

*East Lothian Council Local Development Plan (2016) Proposed*

*John Muir House*

*Haddington*

3 1 OCT 2016

*Dear Sir*

*East Lothian Council Local Development Plan (2016) Proposed*

*This is my objection to ELC LDP (Notes also included)*

*I am objecting to Housing Proposals PS1 and PS2, BW1, HN2(Letham Mains extension) NK7, NK8, NK9, Nk10, NK11*

*Unfortunately I cannot object to those for which construction is already completed or has already started or I would be objecting to those also.*

*(Mains Farm, Ferrygate, Tantallon, Gilsland, North Berwick; Letham Mains, Dovecot, Gateside, Alderston Haddington; Salters Road/Haddington Road Wallyford*

*East Lothian is now seriously overdeveloped – one massive commuter housing coalescence from Muselburgh to Dunbar and more proposed. Yet East Lothian Council's objective is " to protect the unique identity of towns and villages" How precisely can their identities be protected when they are all joined together in one coalescent lump ?*

*What tourists will want to visit East Lothian when it involves driving on roads with massive ugly housing estates on either side to spend a few hours in North Berwick, Dunbar or Haddington*

*East Lothian already has enough executive/luxury homes (4/5/6bedroom) to meet the needs of those it has to accommodate*

*What must be implemented is a total ban on the building of these types of houses for the next 10 years. They are wasteful of energy, encourage the use of cars (all with at least double garages ) for journey of any distance no matter how short and contribute to climate change. ELC's objective is for the reduction of care journeys.*

covered in wind farms) With a massive incinerator operating at Oxwellmains which incinerates all of Edinburgh's commercial and industrial waste East Lothian has been dubbed "the Dirty Man of South Scotland"

I object to WD1 to include land alongside B1377 as Wind Farm development (4 or more wind turbines all over 42m (137 feet) in height. This is a B class road, heavily used but still rural with views to Haddington and North Berwick. ELC's objective of encouraging tourism is totally in conflict with this proposal.

Much of the energy produced in East Lothian is for the benefit of Edinburgh City . East Lothian is expected to provide its energy, incinerate its waste (industrial/commercial at Oxwellmains) and house much of its working population.

In meetings with Edinburgh City Council East Lothian Director of Planning and Planning councillors must be more assertive and tell Edinburgh City (probably the most incompetent local authority in Scotland) to generate more of its own energy, incinerate its own waste and house the majority of its working population in family houses instead of concentrating planning permission on 1 and 2 flats for young executives. There is huge concern about the protection of Edinburgh's Green Belt but nobody cares about East Lothian's Green Belt with half of its quality agricultural land having been covered in concrete.

Residents in East Lothian are seriously concerned about its over development, lack of infrastructure, lack of jobs, overcrowding in schools (primary and secondary), lack of leisure facilities and poorer quality of life than 20 years ago. It is not exaggerating to say that East Lothian with its over development and lack of infrastructure it at point of collapse.

Councillors and East Lothian's MSP must put aside their political differences and ask for urgent meetings with Scottish Government Ministers for Housing/Planning to have this free for all in executive housebuilding stopped and priority is given to building affordable homes to rent/buy and social housing.

*Residents are more than willing to seek meetings with Scottish Government Ministers but councillors and MSPs are paid public servants who should be representing their constituents.*

*This Proposed Local Development Plan is simply a travesty. Its proposals for housing, energy generation, industrial development and transport in no way concur with its objectives.*

*Yours sincerely*

*(Ms) E Macdonald*

*East Lothian Council Local Development Plan 2016 Proposed*

*Prestonpans Cluster*

*2.50 If Prestonpans is deemed to be a focus for retail and business its facilities will have to be improved. Its only bank branch closed recently (2016) and the branch also served Port Seton and Cockenzie*

*2.51 With the demolition of Cockenzie Power Station the site will require to be developed. I am totally opposed to it being developed for heavy industry as was proposed by ELC/Scottish Enterprise last year. The area is not suitable for construction/repair of massive wind turbines with cranes 800 feet high operating 24/7 and massive industrial roads and roundabouts. The health and wellbeing of those living in the area must be considered. ELC's objective: By 2032 Edinburgh City Region is a healthier, more prosperous and sustainable place ... an outstanding area in which to live, work and do business (1.59)*

*Although Cockenzie Power Station provided employment it did so at a cost to those working there, too many incidences of work related diseases, including cancers. And we all remember the sight of polluting black smoke pouring from its chimneys every day of the week. Prestonpans councillors may argue that employment is required for those living in Prestonpans but the same councillors ensure that they live at least 3 miles away from Cockenzie. Residents of Prestonpans who want employment (easy access by bus/train to other areas of East Lothian or Edinburgh) without turning Cockenzie into an industrial wasteland and wrecking residents health/quality of life*

*2.52 I am opposed to the construction of 450 houses at Longniddry South. To create a village of c.1600 residents separate from the main village by East Coast Main Railway Line is nonsense. How can ELC's objective of creating equality in communities be met if a community is divided in half? The infrastructure of the village (school, leisure, lack of employment) cannot support what is, in effect, another village.*

*And to suggest the panacea of longer station platforms/larger car park is illogical. Another 800 dwellings currently under construction in North Berwick, 1500 at Haddington and possibly 520 in the coastal villages will put extra pressure on the railway line*

## *Local Development Plan 2016 Proposed*

### *Blindwells Cluster*

*2.66 I am opposed to the construction of a new town at Blindwells. It will become another of East Lothian's "disgraces" approved by Planning Committee and badly designed/built by developers. It is bound to look like Edinburgh's worst council estates (Niddrie/Craigmillar/Muirhouse), too many dwellings and few facilities. Although Niddrie/Craigmillar has been regenerated to some extent Niddrie Mains Road is the same dismal place it has always been. But at least that area has access to sporting facilities/green space and quality retail at Forth Kinnaird.*

*And I cannot comprehend why planners are obsessed with considering that areas alongside Main Railway Lines are the best places to build housing. Trains only stop at stations and residents have to get to those stations, always by car. Wallyford Park and Ride is a typical example, 300 spaces full by 10 AM and residents driving from all over East Lothian to get to it creating pollution and adversely affecting the environment.*

*Edinburgh should not be seen as the main employment area for East Lothian. With modern communications the whole world can be accessed from East Lothian there is no need for business to be concentrated in Edinburgh. But East Lothian Council's Business Strategy/Development Unit must be more proactive in attracting quality employment to East Lothian. If the Unit does not have the expertise/skill/professionalism to do so ELC should be spending money on recruiting staff of proven ability*

### Haddington Cluster

2.111 If Haddington Town Centre is to be the focus for retail, commercial and business the local centre at Letham Mains needs to be restricted. Likewise the building of a large retail supermarket at Gateside West is bound to detract from Haddington centre, as well as leading to unacceptable car use through the town centre, mainly for short journeys.

2.112 Providing only a primary school at Letham Mains does not address the need for secondary education (education does not stop at age 11) Currently 1500 dwellings are under construction/proposed for Haddington (2016) 95% of them are 4/5/6 bedroom properties generating at least 2 (more likely 3) children. Knox Academy is now at full capacity and to permit 2000 more houses to be built in Haddington without infrastructure, (employment/education/health/leisure/transport) is foolhardy. The area of Letham Mains should have been used for a new community hospital for East Lothian, a hospital providing, day surgery, in patient care and accident and emergency facilities. With an East Lothian population of 102,000 by 2024 it can more than justify it.

If planners are not trained or educated to consider the wider picture than simply housebuilding then East Lothian Council needs an educated Strategy Team to oversee the planning process and to be responsible for the Local Development Plan

2.113 Dovecot and Alderston are already under construction (2016) Herdmanflatt Hospital is totally essential to East Lothian which has a high proportion of residents with mental health conditions. Herdmanflatt provides day care facilities for under 60s and also in patient facilities for those over 60 and those with dementia. The only alternative to Herdmanflatt is Royal Edinburgh (Psychiatric) Hospital due to be located to Royal Infirmary site next year. Visiting at Royal Infirmary is very difficult due to lack of parking (and an ELC objective is to reduce travel by car) The only alternative is by bus (95 minute journey from Haddington) or travelling via Edinburgh (takes the whole day)

2.118/2.119 The proposal for Letham Mains is in total around 1100 dwellings. Add to this the area being developed at Gateside (Saxon Fields and Moncrieff Meadows) the total number of dwellings in that area will be around 1500 dwellings, generating at least 6000 residents (almost the same size as the current North Berwick) To permit such a large number of dwellings to be built without any supporting infrastructure is totally illogical. And to suggest that a new primary school and a five a side playing field plus an extension to Aubigny Sports Centre is adequate is lacking in professionalism and common sense.

2.120 Construction at Dovecot has already started and although 200 dwelling are to be constructed not one of them is affordable or social housing. One of East Lothian Council's objectives is "to create equalities within communities" If East Lothian Council is willing to honour its objectives every housing development should have at least 30% of dwellings dedicated to affordable and social housing. And if property developers want to build in East Lothian (making massive profits) they should be compelled to make a generous contribution to the area they are building in. It is not enough for them to fund the building of one small additional classroom for a primary school they should be made responsible for construction of good quality secondary schools, community centres, indoor and outdoor sports facilities as well as health centres (or large extensions to current health centres) At a meeting in Gullane a director of Cala Homes stated that Cala would be building at least 300 dwellings at Gullane and neither the pressure on Gullane Health Centre, Gullane Primary School, North Berwick High School, congestion on local roads and rail, lack of employment or leisure facilities was any of his concern. According to him those massive problems were for East Lothian Council, Scotrail and NHS Lothian to solve. This attitude is appalling and unacceptable and demonstrates the arrogance of property developers who ensure they do not live in East Lothian.

2.1212.122 Too little land has been allocated by East Lothian Council for employment use. Its Business Strategy Unit needs to be more proactive in bringing employment to East Lothian. There is little use in ELC creating objectives such as "restricting car use and car journeys



*and their effect on climate change” if it does not support these objectives. There have been many opportunities to bring businesses and quality employment to East Lothian but ELC has not taken advantage of the opportunities.*

*2.123 If retail development is provided at Gateside West this will take trade away from Haddington Town Centre. This is in direct conflict to ELC’s statement that “Haddington Town Centre will be the centre for retail, business and commercial use” (2.111) Any town centre benefits from having a supermarket in the centre of town (Tesco in Haddington for example). Though residents and those outwith the town who depend on it for shopping are likely to use a supermarket they will also use independent shops such as butcher, baker, confectioner, hairdresser, barber, florist and coffee shops. But providing a large supermarket 2 miles from the town centre will simply encourage short car journeys which is what the Climate Change Programme is attempting to discourage. No matter how many pathways and cycle tracks are created it has become human nature for residents to take their cars everywhere and ELC should be mindful that it is supposed to be signed up to the Climate Change Programme.*

## Local Development Plan 2016 Proposed

### North Berwick Cluster

2.152 If North Berwick town centre is to be the focus for retail and business any local centre built at Mains Farm should not take business away from the town centre. However, an estate of 340 houses has potential to generate 1360 residents which is equal to the size of many East Lothian villages. Adequate business and leisure provision also needs to be provided at the Mains Farm site. Although land has been made available for open space land for sporting facilities (outdoor and indoor) is also required. With 800 houses currently under construction and proposed for North Berwick there is no way that current leisure and sports facilities can cater for the extra residents. And if East Lothian Council is serious in its objective of creating equality in communities at least 30% of housing at Mains Farm needs to be social housing for rent as well as affordable properties to purchase.

2.153 It is not an expansion that North Berwick High School needs it is a brand new school. North Berwick High was built in 1937 and has had many ugly extensions added to it in the 80 years since it was built. It now resembles a bomb site and is a disgrace to East Lothian Council's education strategy. Land must be made available at Mains Farm for a brand new high school to replace the current building. The building has served all pupils who have been privileged to attend it well but it is now no longer fit for purpose.

There is no point safeguarding the views to and from Dirleton Castle as they have already been ruined by East Lothian Council giving planning permission for a massive wind turbine to be built adjacent to the Castle.

2.154 The local road network at Drem is already totally inadequate but only as a result of over development of housebuilding in the North Berwick area. Many commuters use the B1377 through Drem to the A1 via Ballencrieff and Longniddry. They treat the B class road like a racetrack and there are always vehicles lying in fields or on verges. Residents of Drem and Ballencrieff have regular problems of getting in and out of their own driveways and unacceptable driver behaviour. An

*alternative route to the A1 from North Berwick must be found (or a total ban on construction of executive houses whose residents will always commute to Edinburgh)*

2.154 *And a significant scale of mixed use development it totally inappropriate for Drem. It is an attractive hamlet and one of East Lothian's hidden gems. It has major historic value as Drem Airfield was heavily used in World Wars 1 and 2, Hurricanes and Spitfires being based there to protect Edinburgh and Rosyth Dockyard. Drem Airfield was one of the first areas in the UK to bring down a Heinkel bomber in 1940. It was also where the Aircraft Lighting System was developed to allow aircraft to land safely in poor weather conditions. A system which was installed in every RAF base in the UK. It is therefore a major part of East Lothian's cultural heritage (1.14) and to turn the area into a massive housing estate would be unacceptable and cultural vandalism.*

2.156 *Those of us who live in the coastal villages are well aware of North Berwick's popularity as a tourist destination. There is a constant flow of nonstop traffic on A198 all summer especially during weekends and even in winter if the weather remains reasonable. It may be that channelling some traffic to B1377 at weekends when the road is less busy would ease the situation. In any case A198 from Musselburgh to North Berwick is no longer the scenic route it once was due to over development of housebuilding. Driving past huge housing estates lining the entire route is not likely to appeal to tourists. If East Lothian Council wants to sell East Lothian as a tourist destination its Director of Planning, Planning Committee, local and national politicians will have to make the case to Scottish Government that East Lothian has already taken more than its fair share of executive/luxury housing in order to house Edinburgh City's working population and other areas in Edinburgh City Region (including Edinburgh City itself) must accept their responsibilities in having estates of family sized houses built in their area. If it means building on Edinburgh's Green Belt so be it, East Lothian's Green Belt and green spaces are equally important and should not be urbanised and covered in concrete.*

2.157 *While the coastal villages of Aberlady, Dirleton and Gullane have their own unique character and sensitive landscape settings it has not prevented bad planning decisions being made. 15 years ago*

planning was given to Cala Homes by East Lothian Council to build 100 houses on the south side of Aberlady. They have been described as "the carbuncle on the south face of Aberlady" and without exception are all large, ugly and of a style more suited to urban south east England than rural East Lothian. All of them are wasteful of energy and have double garages encouraging the use of cars for all journeys and contributing to climate change. And despite these extra houses being built (and another site of 110 houses at West Aberlady currently seeking planning permission) facilities in the village and residents quality of life have not improved (1.53) The residents of Dirleton are in exactly the same position since, despite extra housing in the village the only village shop has closed.

2.158 Linking Gullane with Drem Station by a Green Network may be acceptable but what is not acceptable is a shared concrete/tarmac path to be shared by pedestrians/horse riders and cyclists. A number of cyclists in Gullane are determined to get a commuter route to Drem Station. Too many of us who are pedestrians have experienced practical problems from cyclists who race along and are unwilling to stop or slow down on shared paths. They assume that every pedestrian will meekly jump on to the verge to allow them to race along. While cycling may be seen as important so also is walking (excellent feature in a recent East Lothian Courier from a dog walker who experiences all the above problems regularly) Green Networks may be seen as a good thing but keep pedestrians and cyclists well apart.

2.159 Although construction at Mains Farms has already started it is not too late to insist that at least 30% of the dwellings constructed are available as social rented and affordable homes. The shortage of affordable homes in East Lothian for working families/working people working in East Lothian in a national scandal. And this is compounded by East Lothian Council's housing allocation policy which gives priority for housing to the non working (pregnant teenagers, single parent families, the anti-social and those claiming to be disabled) Allocating at least 30% of houses would help to meet East Lothian Council's stated objective (1.53) "to reduce inequalities within and between communities"

2.162/2.163/2.164 Gilsland (Grange) I now completed with a small number of affordable homes being built. The main estate is named

*Gilsland Grange while the affordable homes are named Gilsland Gardens. Despite East Lothian Council's stated objective of "reducing inequalities" it is obvious that inequalities are stronger than ever. Planning permission has been given for Tantallon Road although only 1 ha has been allocated for employment use. If East Lothian Council is serious about its objective of reducing commuting by car it must ensure that all development land for large housing estates includes a large percentage for employment/business. There is no need for Edinburgh/Musselburgh to be seen as East Lothian's main employment area. Every town and village in East Lothian is able to support employment/business of some sort which would reduce car use and make a positive contribution to climate change. Promoting rail transport is all very well but 300 cars converging on Wallyford Park and Ride every day from all areas of East Lothian does no good to the environment.*

**Dowie, Anne**

---

**From:** Currie, Scott on behalf of Customer Services  
**Sent:** 31 October 2016 11:46  
**To:** Environment Reception  
**Subject:** FW: Development of Dryden Field East Saltoun

Can you please respond re attached.

Regards,  
Scott

---

**From:** ANDREW THOMSON |  
**Sent:** 30 October 2016 19:28  
**To:** Customer Services  
**Subject:** Development of Dryden Field East Saltoun



To Policy and Projects Development.

Regarding plans for an expansion of housing in East Saltoun.

Initially, my thoughts are that to almost double the amount of housing in a conservation village without any thought given to education, health and social life is not acceptable to current residents or those who are incoming.

Increasingly we see traffic using a small country road - local, agricultural and leisure (cyclists). All of which are necessary and beneficial to the community.

There seems to be an insensitivity to current home owners who will "back on" to this development given they bought in to a rural way of life.

Would it be possible to address the issues of education, health, leisure and planning before this issue moves on?

I look forward to your response,

Regards,

Drew Thomson.  
Resident.

Head of Planning  
East Lothian Council  
John Muir House  
Haddington  
East Lothian  
EH41 3HA

30 October 2016

Dear Sirs

**Local Development Plan  
East Saltoun**

We refer to the above proposed Local Development Plan and in particular its relation to East Saltoun and wish to lodge an objection on the following grounds:

1. **Transport and traffic:** there is minimal public transport in the village. Any development as proposed would therefore create a considerable increase in traffic.
2. **Amenities:** there are no amenities in East Saltoun other than a very small primary school. As such, generally a minimum of two cars are required per household.
3. **Environmental:** the proposed development would cause erosion of prime agricultural land which is contrary to the original strategic plan. It would also impact on various endangered wildlife species which are currently native to the village.
4. **Social:** an increase in size of ~40% would clearly change the dynamic and nature of the village.

To go into further detail on these points.

**Transport:** we have very poor public transport in the village and in order to be fully mobile it is necessary to have at least one and preferably two cars per household. It is noticeable that the demographic of village residents is geared towards older couples or young families; many families move away to a larger town when children become teenagers and require regular transport to activities out of school hours. It is also imperative to have a car to get to work as the public transport system most certainly does not lend itself to an easy commute to any outlying towns. A development as proposed would therefore result in up to a further 150 cars in the village.

**Amenities:** the only amenity which East Saltoun offers is a very small primary school, which can take up to 14 pupils. There is no shop, no post office, no bank, no prospective employment. We understand that some of the housing is to be earmarked for affordable housing with potentially the inclusion of some homeless occupants; without the resources to purchase and run a car how will they be able to access employment / services given the lack of adequate public transport in the village? Other infrastructural services within the village are also inadequate for current levels of population: water and sewerage for instance run slowly and frequently require attention to remove blockages.

Environmental: East Saltoun is a conservation village in a prime area of agricultural green belt land. Historically (and quite rightly) it has been extremely difficult to get planning permission for any new/replacement builds in the village in order to preserve its appearance and location. We do not understand how a disproportionately large new development can fit into this regime? Further, we have bats and hedgehogs living in the close vicinity of the proposed housing, both protected/endangered species; these will surely be at risk with firstly the construction process and secondly, the consequent significant increase in traffic which it will bring.

Social:

We do not understand why, other than being an easy target, a small conservation village is being selected for such a significant size of development. We believe that an area of Letham Mains which had previously been earmarked for development has now been given the green light, surely brown field sites and areas beside larger towns with proper transport links and access to amenities would be more appropriate?

We strongly feel that the Local Development Plan has given inadequate consideration to the effects on the environment and the communities within East Lothian. The proposed development in East Saltoun is clearly of an inappropriate size and will have a materially adverse effect on the community and the environment of the village. This is a prime and beautiful green belt area of East Lothian and serious consideration should be given to its protection.

Yours faithfully

Grant Middleton

Aileen Burnett



**From:** [Dixon, Rebecca](#)  
**To:** [Moloney, Sinead](#)  
**Subject:** FW: Objection to New proposed South Windygoul development Tranent  
**Date:** 01 November 2016 11:36:57

---

---

**From:** McCulloch, Kevin  
**Sent:** 28 October 2016 14:18  
**To:** Environment Reception  
**Subject:** Objection to New proposed South Windygoul development Tranent

Hi,

I refer to your application for a new housing development to be built at South Windygoul in Tranent and would like to make an objection/raise points with regards to the following points –

traffic generation and road safety – this development will cause a large increase in the amount of traffic coming in to Tranent and in to the windygoul area. Already there are delays upon leaving Tranent in morning and returning in evenings during peak hours due to the volume of traffic and given there is only really one main road coming in to the town. I note that the entrance to the ‘new estate’ is to come off the Ormiston road but I would doubt very much whether traffic will actually come out this road to enter the estate given that the high street is a bottle neck of traffic and it is more likely that this traffic will come up the elphinstone road and past windygoul school in to the new estate thus creating considerable through traffic past the school and also adding to the bottleneck of traffic on the Edinburgh road and potentially the high street should people choose to drive that way.

If more houses are to be built here then surely you need to build another road linking the town with the A1 which avoids the Edinburgh road and the high street, if not, this is going to lead to considerable traffic congestion coming in and out of the town at peak times and also generate far more traffic going past what will become the largest school in the town (windygoul) and putting children in danger.

The current road network is not adequate for the addition of so many more houses, and arguably it is not adequate for the number of people living here already, never mind adding any more.

The addition of so many more houses will lead to Tranent becoming gridlocked unless you provide another access road to the south of the town which does not go via the Edinburgh road or the high street.

development plan, visual appearance and loss of trees – I note there are two areas earmarked for ‘high density housing’ as well as an extension to the school. I will object to these plans if any of these developments are to be over 2 storeys high as you are already going to be digging up a ‘green barrier’ of trees between the existing estate and the new estate to accommodate an extension of the school therefore the removal of all of these trees gives a full view across to the proposed high density housing and school extension and if any of these developments are built beyond 2 stories high it then gives a ‘concrete jungle’ effect and becomes an urban sprawl which is not in keeping with a small town. People actually move out here to avoid higher rise buildings and high density housing therefore I would argue that this is not in keeping with the town or the local area to have buildings above 2 stories and for a whole line of trees to be removed with no others planted in their place to separate the old estate and the new one.

Regards,

Kevin McCulloch

# HolderPlanning

Town Planning and Development Consultants

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

1 November 2016

Our ref: FORT001

Your ref:

Dear Sirs

**REF: FORTH PORTS LTD, EAST LOTHIAN LOCAL DEVELOPMENT PLAN, REPRESENTATION TO PROPOSED PLAN.**

This representation has been prepared on behalf of Forth Ports Ltd in response to the East Lothian Proposed Local Development Plan. It provides a context for their response and brings together their submissions in respect of Section 1 and Section 4 of the Plan.

Forth Ports are both the Statutory Harbour Authority and the Competent Harbour Authority for the Firth of Forth and perform a number of functions as prescribed by legislation (Forth Ports Authority Order Confirmation Act 1969) including overseeing of safety of navigation and licencing of all works below MHWS between the tidal limits inland and the mouth of the Firth. They own and operate a number of ports within the Firth of Forth, including the largest of the facilities at the Ports of Leith, Rosyth and Grangemouth. Forth Ports also operate the Forth and Tay Navigation Service which controls vessel movements on the Firths of Forth and Tay.

Forth Ports Ltd recognises that the former Power Station is available for development and this representation seeks to ensure that future development is of an appropriate nature, taking into account the relevant provisions within the National Planning Framework, environmental and operational considerations. It specifically addresses matters related to port operations.

**Section 1 The National, Regional & Local Plan Policy Context**

The provisions of National Planning Framework 3 in relation to Cockenzie are recognised Paragraph 1.46 of the proposed Plan and broadly this is supported. In particular it notes,

*In relation to Cockenzie, the LDP is to ... (ii) recognise its potential for renewable energy related development as well as (iii) its potential for energy related port development."*

However, NPF3's support for energy related port development relates specifically to the marine renewable energy industry and not simply 'port related development.' The use of the phrase 'port related development' implies support a broader range of port operations. Paragraph 3.34 of NPF3 states,

*"Major infrastructure investment will provide the marine renewable energy industry with upgraded and new-build port and harbour facilities..."*

**Modification required:** Paragraph 1.46 should be amended to accurately reflect NPF3 as follows:

*"In relation to Cockenzie, the LDP is to ...(ii) recognise its potential for renewable energy related development as well as (iii) its potential for marine renewable energy related port development."*

#### **Section 4 Our Infrastructure and Resources - Energy Generation and Transmission**

Paragraph 4.88 of the proposed Plan notes the opportunities for renewable energy-related investment contained within NPF3. The paragraph states,

*"While it [NPF3] safeguards the former Cockenzie Power Station site for future thermal power generation it notes that there may be opportunities for renewable energy-related investment and also there may be potential for port related development."*

As stated above, NPF3's support for port facilities specifically relates to the marine renewable energy industry and not port related development which implies support a broader range of port operations. The requirements of NPF3 needs to be accurately reflected.

**Modification required:** Paragraph 4.88 should be amended to accurately reflect NPF3 as follows:

*"While it [NPF3] safeguards the former Cockenzie Power Station site for future thermal power generation it notes that there may be opportunities for renewable energy-related investment and also there may be potential for marine renewable energy related port ~~port related~~ development."*

Paragraph 4.96 of the proposed Plan makes reference to the provisions of NPF3 stating,

*"...it is noted in NPF3 as a location with potential for energy-related development and potentially for associated port-related development."*

As previously stated, the requirements of NPF3 need to be accurately reflected.

**Modification required:** Paragraph 4.96 should be amended to accurately reflect NPF3 as follows:

*"...it is noted in NPF3 as a location with potential for energy-related development and potentially for associated marine renewable energy related port ~~port related~~ development."*

## **Environmental and Operational Considerations**

Notwithstanding the modifications sought, Forth Ports are firmly of the view that the development of port infrastructure at Cockenzie presents a number of environmental and operational challenges, as follows:

**Dredging** – Deep water capabilities do not exist at Cockenzie, indeed Admiralty Chart ref: 0734 notes that water of a suitable depth lies between ¼ and 2 nautical miles from the former Power Station (5m depth contour located at ¼ nautical miles and 10m depth contour located at 2 nautical miles). To create the deep water required to support marine renewable energy requirements there will be a need to undertake a significant capital dredge which will require ongoing maintenance. Both the initial capital and ongoing maintenance dredge will be a costly exercise. Ecologically, the necessary dredging will have the potential to create a significant impact on the existing Firth of Forth SPA and the proposed marine SPA - Outer Firth of Forth and St Andrews Bay Complex.

**Exposure** – The site lies in a location which is exposed to poor weather conditions. Loading/unloading and other port related activities and especially those related to the movement of heavy items will be challenging and is likely to prove unattractive to potential operators.

**Existing port facilities** – Forth Ports are firmly of the view that national and local government should fully recognise the port facilities that have already been developed and operate throughout Scotland, and fully consider the options to further expand these facilities rather than consider the development of new. Existing major facilities across Scotland have developed based on their geographical location/advantage close to their customers. In the most part they have capability to expand at a cost substantially lower than the cost of a new development and often with reduced implications in relation to the environmental and planning matters.

I trust the foregoing clearly explains Forth Ports' justification for the changes sought to the proposed LDP and will enable East Lothian Council to support the proposed modifications.

Please do not hesitate to contact me should you require further information or clarification.

Yours sincerely,

Lesley McGrath  
Associate Director

**Holder**Planning

# Response ID ANON-ZMS3-3MJ4-B

Submitted to **East Lothian Proposed Local Development Plan**

Submitted on **2016-11-01 13:08:03**

## About You

### 1 What is your name?

**First name:**

Lesley

**Surname:**

McGrath

### 2 What is your email address?

**Email address:**

lesley.mcgrath@holderplanning.co.uk

### 3 Postal Address

**Address:**

5 South Charlotte Street

### 4 Please enter your postcode

**Postcode:**

EH2 4AN

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

Other

### 6 What is your organisation and role (if applicable)?

**Organisation:**

Forth Ports Ltd

**Your role:**

Agent

### 7 Are you supporting the plan?

No

**If Yes: Please include your reasons for support:**

## Section 1 - Introduction (pages 1-10)

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

**Modification(s) sought::**

Modification required: Paragraph 1.46 should be amended to accurately reflect NPF3 as follows:

"In relation to Cockenzie, the LDP is to ... (ii) recognise its potential for renewable energy related development as well as (iii) its potential for marine renewable energy related port development."

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

**Justification for Modification(s):**

Section 1 The National, Regional & Local Plan Policy Context

The provisions of National Planning Framework 3 in relation to Cockenzie are recognised Paragraph 1.46 of the proposed Plan and broadly this is supported. In particular it notes,

In relation to Cockenzie, the LDP is to ... (ii) recognise its potential for renewable energy related development as well as (iii) its potential for energy related port development."

However, NPF3's support for energy related port development relates specifically to the marine renewable energy industry and not simply 'port related development.' The use of the phrase 'port related development' implies support a broader range of port operations. Paragraph 3.34 of NPF3 states, "Major infrastructure investment will provide the marine renewable energy industry with upgraded and new-build port and harbour facilities..."

Modification required: Paragraph 1.46 should be amended to accurately reflect NPF3 as follows:

"In relation to Cockenzie, the LDP is to ... (ii) recognise its potential for renewable energy related development as well as (iii) its potential for marine renewable energy related port development."

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

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

**Modifications(s) Sought:**

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

**Justification for Modification(s) :**

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

**Modifications(s) Sought:**

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

**Justification for Modification(s):**

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

**Modifications(s) Sought:**

**3b Please give any information/reasons in support of each modification suggested to the Other Infrastructure: Major Hazard Sites & Pipelines section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.**

**Justification for Modification(s):**

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

**Modifications(s) Sought:**

Modification required: Paragraph 4.88 should be amended to accurately reflect NPF3 as follows:

"While it [NPF3] safeguards the former Cockenzie Power Station site for future thermal power generation it notes that there may be opportunities for renewable energy-related investment and also there may be potential for marine renewable energy related port development."

Modification required: Paragraph 4.96 should be amended to accurately reflect NPF3 as follows:

"...it is noted in NPF3 as a location with potential for energy-related development and potentially for associated marine renewable energy related port development."

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

**Justification for Modification(s):**

Section 4 Our Infrastructure and Resources - Energy Generation and Transmission

Paragraph 4.88 of the proposed Plan notes the opportunities for renewable energy-related investment contained within NPF3. The paragraph states, "While it [NPF3] safeguards the former Cockenzie Power Station site for future thermal power generation it notes that there may be opportunities for renewable energy-related investment and also there may be potential for port related development."

As stated above, NPF3's support for port facilities specifically relates to the marine renewable energy industry and not port related development which implies support a broader range of port operations. The requirements of NPF3 needs to be accurately reflected.

Modification required: Paragraph 4.88 should be amended to accurately reflect NPF3 as follows:

"While it [NPF3] safeguards the former Cockenzie Power Station site for future thermal power generation it notes that there may be opportunities for renewable energy-related investment and also there may be potential for marine renewable energy related port development."

Paragraph 4.96 of the proposed Plan makes reference to the provisions of NPF3 stating,

"...it is noted in NPF3 as a location with potential for energy-related development and potentially for associated port-related development."

As previously stated, the requirements of NPF3 need to be accurately reflected.

Modification required: Paragraph 4.96 should be amended to accurately reflect NPF3 as follows:

"...it is noted in NPF3 as a location with potential for energy-related development and potentially for associated marine renewable energy related port development."

#### Environmental and Operational Considerations

Notwithstanding the modifications sought, Forth Ports are firmly of the view that the development of port infrastructure at Cockenzie presents a number of environmental and operational challenges, as follows:

**Dredging** – Deep water capabilities do not exist at Cockenzie, indeed Admiralty Chart ref: 0734 notes that water of a suitable depth lies between ¼ and 2 nautical miles from the former Power Station (5m depth contour located at ¼ nautical miles and 10m depth contour located at 2 nautical miles). To create the deep water required to support marine renewable energy requirements there will be a need to undertake a significant capital dredge which will require ongoing maintenance. Both the initial capital and ongoing maintenance dredge will be a costly exercise. Ecologically, the necessary dredging will have the potential to create a significant impact on the existing Firth of Forth SPA and the proposed marine SPA - Outer Firth of Forth and St Andrews Bay Complex.

**Exposure** – The site lies in a location which is exposed to poor weather conditions. Loading/unloading and other port related activities and especially those related to the movement of heavy items will be challenging and is likely to prove unattractive to potential operators.

**Existing port facilities** – Forth Ports are firmly of the view that national and local government should fully recognise the port facilities that have already been developed and operate throughout Scotland, and fully consider the options to further expand these facilities rather than consider the development of new. Existing major facilities across Scotland have developed based on their geographical location/advantage close to their customers. In the most part they have capability to expand at a cost substantially lower than the cost of a new development and often with reduced implications in relation to the environmental and planning matters.

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

**Modifications(s) Sought:**

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

**Justification for Modification(s):**

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

**Modifications(s) Sought:**

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

**Justification for Modification(s):**





Head of Planning  
East Lothian Council  
John Muir House  
Brewery park  
Haddington  
East Lothian  
EH41 3HA

1<sup>st</sup> Floor, George House  
36 North Hanover Street  
Glasgow  
G1 2AD

Sent by email to: [ldp@eastlothian.gov.uk](mailto:ldp@eastlothian.gov.uk)

Neil Macdonald, Town Planner  
Mobile: 07850 405909

E-Mail: [neil.macdonald@networkrail.co.uk](mailto:neil.macdonald@networkrail.co.uk)

Our Ref: Policy/East Lothian Council  
/Proposed Development Plan  
Representation

1st November 2016

Dear Sir/Madam,

### **East Lothian Council Proposed Local Development Plan 2016 – Representation on Behalf of Network Rail**

Thank you for publishing the Proposed Local Development Plan 2016. This representation sets out a comprehensive response to the Plan and should be read in its entirety as a letter initially. It uses the Council's requisite headings below and sets out the views and comments.

To assist the Council the sections have also been uploaded through the Council website under each separate heading, so it allows the Council to collate the information in relation to each topic area.

#### **About You**

Network Rail is the statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts.

The rail network provides a key contribution to the aims and objectives of the East Lothian Council Proposed LDP's vision and spatial strategy. For objectives of sustainable development; sustainable modes of transport and improved rail connections to be realised, Network Rail will rely on Development

Plan guidance and policy to assist with increasing the safety of the railway and the protection and enhancement of the infrastructure.

To enable East Lothian Council achieve the vision of the LDP we strongly request that due consideration is given to the comments provided within this representation.

### **Section 1 Introduction**

We would like to note that Network Rail broadly supports the Proposed LDP on the need for investment in infrastructure to support the City Region. Our comments endeavour to reinforce the policy framework set out in the SESplan Proposed Strategic Development Plan, which is also currently out for consultation, and to ensure that it accommodates reasonable foreseeable future demands on both existing and future railway infrastructure in the City Region.

In summary, we are keen to seek continued support for safeguarding and improving the safety and capacity of the existing and future railway network in tandem with new development, and that where improvements are required, that they are considered at the right time as part of the planning for new development with appropriate strategic assessment and to feed in to and mitigate the infrastructure and capacity issues required.

The Proposed LDP does recognise that by directing growth towards public transport corridors, that the provision of additional capacity or where required, improved facilities, the network will become constrained and will not be able to provide increased service. Accordingly Network Rail considers that the Proposed LDP requirement that development must be accountable for resultant requirements to railway infrastructure and facilities is welcomed.

Given the proposed growth strategy and ambitions for East Lothian is closely related to the existing rail network with future development linked to existing railway demand and facilities around the station, there will be an increase in demand for rail service. This increased service provision may result in the requirement for upgraded rail infrastructure or to upgrade facilities at stations.

The Proposed LDP sets out a clear strategic context for seeking developer contributions for required infrastructure enhancements or station improvements as a direct consequence of new development growth. Further detail on this and how it would be implemented and the scale would be welcomed.

Network Rail should be clearly excluded from having to make developer contributions. As a Government organisation all our funding comes from the taxpayer.

### **Level Crossings**

Development proposals affecting the safety of level crossings in East Lothian are an extremely important consideration for Network Rail and Transport Scotland and emerging planning policy should seek to address this. The impact from

development can and will often result in increases in pedestrian and vehicular traffic utilising a crossing, which can in turn have impacts on safety, service provision and queues.

As a result of increased patronage over crossings, Network Rail could be forced to reduce train line speed in direct correlation to the increase in vehicular and pedestrian traffic using a crossing. This would have severe consequences for the timetabling of trains and would also effectively frustrate any future train service improvements. This would be in direct conflict with Government aims and objectives of the LDP for improving rail service within East Lothian.

We work with local councils to reduce level crossing risk and encourage planning authorities to co-operate in securing level crossing closures or improvements in connection with new developments. Only in exceptional circumstances will we permit new crossings to be introduced onto the network.

The Proposed LDP site allocations must take cognisance of the impact of development proposals affecting level crossings. Transport assessment and developer contributions policy and supplementary guidance must ensure infrastructure risks are identified and mitigation secured i.e. level crossing upgrades; alternative crossings etc.

#### Notification Zones

We would request that the Proposed LDP provides a designated notification zone around all operational railway infrastructure within which any development application proposals would be notified to Network Rail and that this would also safeguard the future rail line improvements proposed.

### **Section 2 A Spatial Strategy for East Lothian**

The Plan through paragraph 1.30 recognises that the rail network through East Lothian currently has limited capacity. Utilisation of the East Coast Main Line for intercity connections affects scheduling for local services on it as well as those from the North Berwick Branch Line. A study has confirmed the potential for another local service, but its introduction is dependent on the operation of the east coast rail franchise. In addition to the potential for improvements of the East Coast Main Line, including a four track section, any confirmed longer term vision for high speed rail on other lines may release additional capacity on the East Coast Main Line. Currently, six rail stations are located on the main line at Musselburgh, Wallyford, Prestonpans, Longniddry, Drem and Dunbar, with North Berwick Station on the branch. There is potential for new stations at East Linton and Blindwells. A bid is being progressed by the Council to seek part funding from the Scottish Government to deliver a new station at East Linton. Notwithstanding this, local trains are often full at peak times and while more carriages would help the situation this will require the lengthening of station platforms (particularly in the west of the area) for longer trains as well as the expansion of station car parks.

Paragraph 1.33 advises that East Lothian's transport network and services are experiencing capacity issues which are compounded in the west by commuting travel patterns from the east causing issues 'down line' in the morning and afternoon peak times. These existing capacity issues have been caused by the cumulative impact of

population growth in, and commuting through and from, the area. It is the west of East Lothian that is best served by public transport and where there may be greatest potential for a modal shift to more sustainable modes of transport. Nonetheless, further impacts are anticipated from development planned in East Lothian and in areas around it, requiring the delivery of suitable mitigating interventions.

### **Aims, Objectives & Outcomes**

Paragraph 1.61 sets out the aims and objectives of the LDP, taking into account those Council Plan objectives that are directly relevant to land use planning. In addition, the references in brackets indicate which of the EL CPP Single Outcome Agreement outcomes the aim or objective supports. In relation to network rail the following objective is of relevance and importance:

- To integrate land use and transport by selecting locations for new development that help to minimise the need to travel and that are well-served by a range of transport modes, particularly public transport and active travel opportunities, including the development of a multifunctional green network in the area, and to help reduce CO2 emissions;

2.3 The spatial strategy is a compact one, as it focuses the majority of new development in the west of East Lothian. This is where the best opportunities are to locate new housing and economic development in the most accessible part of the area. Appropriate development sites that are or can be integrated with sustainable transport options are allocated. This is so new development will have good access via sustainable transport modes to existing or new employment locations or community facilities that are or will become available locally and regionally.

The Plan through Paragraph 1.12 sets out the overarching principle of this Plan is that all development proposals should support sustainable development, including the reduction of carbon and other greenhouse gas emissions. The following broad principles have been followed when identifying sites for development.

Comment: Network Rail has highlighted above what it sees as the key text from the Spatial Strategy as it relates to it. We support the Spatial Strategy and growth options and how it focuses on sustainable public transport in its locational characteristics and strategy. Rather than reiterate comments in this section on the Spatial Strategy we have advanced detailed comments in relation to the following sections of the LDP.

Growing Our Communities

### **Section 2a – Musselburgh Cluster Main Development Proposals (pages 15-26)**

5,300 homes for Musselburgh proposed. Through paragraph 2.16 it advises land at Craighall is allocated for a significant mixed use development, including a new local centre. Land for employment will be focused around Queen Margaret University (QMU), a modified junction with the A1 and Musselburgh station: land is safeguarded to improve the station in recognition of the scale of development. The Craighall site is also nearby Newcraighall Station, Shawfair Station on the Borders Railway and the potential route of Tramline 3 as set out in the City of Edinburgh's Second Proposed LDP. Employment land to the west of QMU is located in the middle of these assets and will be developed for uses that support the key sectors of learning, life sciences and food and drink that are clustering in the area. Land to the east of Millerhill Marshalling Yards is allocated for mixed use development. Land around Old Craighall Village and to the east of QMU is also allocated for homes. Paragraph 2.18 advises improvements are proposed at Musselburgh and Wallyford stations, including car

park expansions and platform lengthening. Detailed policies in relation to individual sites is set out through Policies MH1 to MH16.

Comment: Network Rail welcomes the detailed analysis and information on the development within the Musselburgh cluster and how it seeks to ameliorate this through improvements, which accord with our own strategy and proposals. The cross reference to and the detailed policies set out through the Transport section of the LDP and in particular the detailed policies on improvement works and contributions required are welcomed. This forms a sound and detailed basis and one which we support.

### **Section 2b – Prestonpans/Cockenzie/Port Seton/Longniddry Cluster Main Development Proposals (pages 25-26)**

650 homes Prestonpans and the Infrastructure and Resources through paragraph 2.53 advises improvements are proposed at Prestonpans and Longniddry stations, including car park expansions and platform lengthening. Detailed policies in relation to individual sites is set out through Policies PS1 to PS2.

Comment: Network Rail welcomes the detailed analysis and information on the development within the cluster and how it seeks to ameliorate this through improvements, which accord with our own strategy and proposals. The cross reference to and the detailed policies set out through the Transport section of the LDP and in particular the detailed policies on improvement works and contributions required are welcomed. This forms a sound and detailed basis and one which we support.

### **Section 2c – Blindwells Cluster Main Development Proposals (pages 28-30)**

1,600 homes Blindwells. Paragraph 2.67 sets out that opportunities for potential rail access into the site must be safeguarded as part of the development (PROP T13). Detailed policies in relation to individual sites is set out through Policies BW1 along with BW2 for a potential future expanded Blindwells development.

Comment: Network Rail welcomes the detailed analysis and information on the development within the cluster. However, the extended Blindwells area will put pressure on use of the St Germain's level crossing and Network Rail wish that this is closed as part of the proposal is absolutely essential to shut this dangerous and unwelcome level crossing. We would welcome the text on this section and within the Transport section of the LDP being revised to make this clear.

The cross reference to and the detailed policies set out through the Transport section of the LDP and in particular the detailed policies on improvement works and contributions required are welcomed. This forms a sound and detailed basis and one which we support.

### **Section 2d – Tranent Cluster Main Development Proposals (pages 31-32)**

There is no direct rail impact and Network Rail wishes to raise no comment.

### **Section 2e – Haddington Cluster Main Development Proposals (pages 41-43)**

There is no direct rail impact and Network Rail wishes to raise no comment.

### **Section 2f – Dunbar Cluster Main Development Proposals (pages 47-50)**

1,500 homes Dunbar with the Infrastructure and Resources with paragraph 2.133 advising that at East Linton land is safeguarded for a new rail station and car park

expansions and platform improvements at Dunbar Station are supported. The provision of additional pedestrian and cycle access between the northern and southern parts of the town separated by the rail line will be required: the reopening of an existing underpass will be required to the west of the town in association with development at Hallhill North; a new foot and cycle path shall be provided through the Spott Road employment site in association with development at Newtonlees. Detailed policies in relation to individual sites is set out through Policies DR1 to DR11.

Within the Dunbar area it also includes East Linton where PROP DR8: Pencraig Hill, East Linton. Land at Pencraig Hill, East Linton is allocated for a residential development of circa 100 homes. Any development proposals for the site must include a comprehensive masterplan for the entire allocated site that integrates development with the surroundings. Any development here is subject to the mitigation of any development related impacts, including on a proportionate basis for any cumulative impacts with other proposals including on the transport network and on education and community facilities as appropriate. Within the policy it notes "*Note: Land capable of accommodating a new railway station, car park and access is safeguarded adjacent to the East Coast Main Line at East Linton in accordance with Proposal T12: Railway Station Safeguarding at East Linton of this Plan. Development that would prevent the use of this land for a station will not be permitted*".

Comment: Network Rail welcomes the detailed analysis and information on the development within the cluster and how it seeks to ameliorate this through improvements, which accord with our own strategy and proposals. The cross reference to and the detailed policies set out through the Transport section of the LDP and in particular the detailed policies on improvement works and contributions required are welcomed. However, the policy within transport reflects the intention to provide an new downside platform, but this should also reflect the need to access it from the station and the text within this and the Transport policy wording should reflect that an all access bridge is required to link the station platforms.

### **Section 2g – North Berwick Cluster Main Development Proposals (pages 53-56)**

1,300 homes North Berwick and it notes the increased platform length at the station has been provided. Through paragraph 2.154 Drem is within the SDA and benefits from a railway station on the East Coast Main Line, but this is served only by local train services. However, in the long term, a significant scale of mixed-use development here may present an opportunity for road realignment and the relocation of Drem station.

Comment: Network Rail welcomes the detailed analysis and information on the development within the cluster and how it seeks to ameliorate this through improvements, which accord with our own strategy and proposals. The cross reference to and the detailed policies set out through the Transport section of the LDP and in particular the detailed policies on improvement works and contributions required are welcomed. This forms a sound and detailed basis and one which we support.

### **Section 3 – Town Centres, Employment and Tourism (pages 57-63)**

No comment.

### **Section 4 – Our Infrastructure and Resources (pages 88-117)**

Paragraph 4.1 Effective and efficient transport and digital communications networks are fundamental to today's lifestyle and to supporting sustainable economic growth.

The transport network is needed to attract economic development and encourage job creation, to conveniently access work, education, services, leisure and recreation opportunities, and to allow for the delivery of goods and services.

Paragraph 4.2 recognises The LTS vision includes improvements to the road and rail networks, including the enlargement of station car parks and platforms (for larger trains), the potential provision of new rail stations, and improvements to the trunk and local road network, including to junctions and interchanges. Real time travel information systems and integrated timetabling and ticketing are also promoted.

Comment: Network Rail welcomes the thrust of the sustainable transport policies set out.

### **Strategy Diagram 2 the Potential ECML 4 track railway corridor.**

Comment: Network Rail welcomes the insertion of Diagram 2 to set the strategic context for the 4 track railway corridor. However, if this is to be delivered it will require detailed maps and assessment and a safeguarding corridor. It would greatly assist that this map be produced/revised or as part of supplementary guidance showing the route in more detail and making it clear this is a safeguarding zone where development will not be allowed.

### **Support Policy Policy T2 : General Transport Impact**

New development must have no significant adverse impact on:

- Public transport operations in the surrounding area, both existing and planned, including convenience of access to these and their travel times;

Where the impact of development on the transport network requires mitigation this will be provided by the developer and secured by the Council by planning condition and / or legal agreement where appropriate.

#### *Existing Rail Stations*

4.17 The Council recognises the importance of rail travel, particularly for accessing the centre of Edinburgh. There are currently two rail services to and from Edinburgh that stop at stations in East Lothian: a local service to North Berwick, and Dunbar is served by the operator of the East Coast franchise. Cross Country Trains and Scotrail now stop some trains at Dunbar, providing a two-hour frequency to Edinburgh and also offering services to a range of destinations in England.

4.18 Rail studies commissioned in 2004 and 2012 by East Lothian and Scottish Borders Councils concluded that a local service to Dunbar is feasible, which could make stops at other stations in the area. Both Councils are currently discussing with stakeholders how to progress matters. The Council will continue to seek capacity improvements on the east coast rail line for new stations, including at East Linton (which is subject to a STAG2 Appraisal), and for service improvements, particularly to Dunbar and North Berwick.

4.19 The East Lothian Transport Appraisal and model identifies that the additional trips to and from new development in the area will increase demand for capacity on the rail network. This could be met by longer trains being brought into use. Platform lengthening at North Berwick station is already complete and a new platform is committed at Dunbar station.

Other relevant station platforms will also require to be extended. The appraisal identifies the proportional impacts of development in specific zones that will generate

a need for interventions assessed as necessary to provide the required capacity increases. The cumulative impacts of development mainly converge in the west of East Lothian, particularly in the short term. Provision for the interventions set out below must be made by developments that generate a need for them as set out in the Developer Contributions Framework Supplementary Guidance in accord with Policy T32 and Policy DEL1.

4.20 Land is safeguard adjacent to existing stations at Musselburgh, Prestonpans, Longniddry and Drem (as shown on the Proposals Map) to construct additional car and cycle parking spaces or platform extensions for longer trains or platform improvements as appropriate.

Comment: Network Rail supports the detailed information set out in the explanatory text which sets both the context and the requirements.

#### **PROP T9: Safeguarding of Land for Larger Station Car Parks**

Land is safeguarded adjacent to Musselburgh (see also Proposal T11), Longniddry (circa 80 spaces) and Drem (circa 12 spaces) stations to allow additional car and cycle parking spaces / storage facilities to be provided, as shown on the Proposals Map. Other than for Proposal T11, relevant proposals will be required to contribute to these interventions as set out in the Developer Contributions Framework Supplementary Guidance in accord with Policy T32 and Policy DEL1. The location of all proposals will be subject to HRA.

Comment: Network Rail supports the detailed information set out in the explanatory text which sets both the context and the requirements. Network rail would like to contribute to the developer Contributions Supplementary Guidance.

#### **PROP T10: Safeguarding Land for Platform Lengthening**

Land is safeguarded adjacent to the existing stations at Musselburgh, Wallyford, Prestonpans, Longniddry, Drem and Dunbar to allow additional platform capacity to be provided for longer eight car trains as a minimum, as shown on the Proposals Map. Other than for platform capacity at Dunbar, relevant proposals will be required to contribute to these interventions as set out in the Developer Contributions Framework Supplementary Guidance in accord with Policy T32 and Policy DEL1. All proposals will be subject to HRA to ensure that effects on the qualifying interests of the Firth of Forth SPA are avoided during construction.

Comment: Network Rail supports the detailed information set out in the explanatory text which sets both the context and the requirements.

#### **PROP T11: Safeguard Land for Improvements to Musselburgh Station**

Approximately 1.5 hectares of land is safeguarded adjacent to Musselburgh station to reflect the Council's aspiration that a rail related transport hub with car parking, bus and active travel access be delivered to the south-west of the Mucklets Road, as shown on the Proposals Map. A HRA will be required of possible locations.

Comment: Network Rail supports the detailed information set out in the explanatory text which sets both the context and the requirements.

#### **PROP T12: Railway Station Safeguarding at East Linton**

Land capable of accommodating a new railway station, car park and access is safeguarded adjacent to the East Coast Main Line at East Linton as shown on the Proposals Map. Development of the new station is subject to further assessment,



including HRA. Provision for road access to this potential station site has been made through the adjoining housing area. Development that would prevent the use of this land for a station will not be permitted. The Council will maintain its efforts to source appropriate funding and the provision of a service.

Comment: Network Rail supports the detailed information set out in the explanatory text which sets both the context and the proposal.

*Longer Term East Coast Main Line Improvements: Four Track, New Rail Station and Overbridge*

4.23 The East Coast Main Line as it passes through East Lothian currently only has a single track for north and south bound trains. This limits the capacity of the main line to accommodate train pathways for local train services as well as higher speed intercity train services. To provide additional capacity on the main rail line, in the longer term a four track section could be provided in East Lothian to allow local services to wait off the main line so high speed trains can pass; associated improvements to the Portobello Junction may also be required. If these interventions or similar were delivered, a new station could be introduced within East Lothian in association with the new four track section.

4.24 Network Rail has been investigating where a four track section could best be provided in East Lothian. The section of the East Coast Main Line between Prestonpans and Drem Stations has been identified as the most desirable section of the line for this. This would include works to Prestonpans, Longniddry and Drem stations. Land adjacent to Blindwells new settlement could provide a location for a new station. This may avoid replacement of existing structures and minimise engineering operations as well as improve safety and make use of available land and existing assets. To the south of this section of the existing rail line former mineral sidings exist within the land allocation for Blindwells new settlement (PROP BW1); to the north the local road network includes a length of dual carriageway that is not needed to accommodate anticipated vehicle flows.

4.25 Importantly, a four track section of the main line and a new station with vehicular and pedestrian overbridge if provided adjacent to Blindwells could serve the new settlement and the wider area. The overbridge would provide a connection between the A198, Blindwells and the new station, as well as another route to the A1 and Tranent from the A198 through Blindwells and the opportunity to extend bus services. These connections could help overcome community severance issues caused by the existing road and rail lines and allow for the improvement of bus access in the area, connect communities and amenities as well as link public transport services and hubs. It would also allow the existing level crossing at St Germain's to be removed to improve safety on the East Coast Main Line.

4.26 The delivery of such a project would be dependent upon external funding and support as well as further assessment and appraisal. The section of the East Coast Main Line where a four track section as well as any new station and overbridge may be provided is shown indicatively on the Proposals Map.

**PROP T13: East Coast Main Line: Four Track Section, New Rail Station and Vehicular Overbridge**

Subject to further assessment and appraisal, land to the north and south of the East Coast Main Line that could be capable of accommodating the potential alignment of a new four track section of track and a potential location for a new railway station, car

park, access and overbridge of the rail line is shown indicatively on the Proposals Map. A proposed route will be identified if and when required and which will be subject to further assessment, including HRA.

Comment: Network Rail welcomes the insertion of Diagram 2 and the Policy set out in T13 to set the strategic context for the 4 track railway corridor. However, if this is to be delivered it will require detailed maps and assessment and a safeguarding corridor. It would greatly assist that this map be produced/revised or as part of supplementary guidance showing the route in more detail and making it clear this is a safeguarding zone where development will not be allowed.

**Section 5 – Diverse Countryside & Coastal Areas (pages 118-124)**

No comment.

**Section 6 – Our Natural Heritage (pages 125-136)**

No comment.

**Section 7 – Design (pages 137-141)**

No comment.

**Section 8 – Delivery (pages 142-144)**

No comment.

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

The developer contributions maps set out in Appendix 1 in relation to rail are welcomed. More detailed information on the contributions and how these would be assessed to provide the rail infrastructure required would assist, along with detail on the Developer Contributions Framework Supplementary Guidance.

**Appendix 2 to Appendix 4**

No comment

Yours faithfully

*Neil Macdonald*

**Neil Macdonald  
Town Planner**

**Encl**

**From:** .  
**To:** [Local Development Plan](#)  
**Subject:** OBJECTION - East Lothian Development Plan - East Saltoun  
**Date:** 01 November 2016 15:03:41

---

Dear Sir/Madam,

I note that within your recent proposed development plan for East Lothian you have allocated Dryden Field in East Saltoun for housing. Further investigation indicates 75 houses allocated within this field.

I would like to object to this proposal on a number of grounds:-

- the village does not have the infrastructure for these extra houses
- there is no public transport and therefore the narrow high street will become very busy and I feel overcrowded with traffic
- This is surely prime land - is this development therefore not against your policy for development embargo on prime agricultural land?
- We have no shop in the village and no other services
- The primary school will be unlikely to be able to cope with the capacity for these new pupils.

As this will almost double the size of the village I would also ask what other support will it get to cope with this new influx of people, transport etc. At present we have no mains gas in the village and very little other facilities.

Regards

***Dr Candy Hatherley***

28 October 2016

*By email to [ldp@eastlothian.gov.uk](mailto:ldp@eastlothian.gov.uk)*

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

Dear East Lothian Council

**Comments from the Aberlady Community Association on East Lothian Council's 1) proposed Local Development Plan and 2) proposed Draft Development Brief for site NK10**

I am writing on behalf of Aberlady Community Association to comment on the East Lothian Council's proposed Local Development Plan (LDP) and proposed Draft Development Brief for site NK10.

The Association's comments on the LDP reflect our earlier consultation within the Aberlady community regarding the proposed development of the site under planning application reference 16/00552/PM. This site is identified as proposed housing development NK10 in the draft LDP. Our consultation included two open public meetings in March and September 2016 attended by around 100 people and 70 people respectively.

Our comments concerning the draft LDP comprise:

- **General views on the proposed LDP** (pages 1-2 of this letter)
- **Application of area-based policies to Aberlady** (page 2)
- **Proposed housing development site NK10 Aberlady West** (pages 2-4)

We have provided our comments on the **Proposed LDP Draft Development Brief for Site NK10** separately in **Annex 1** at the end of this letter.

**General views on the proposed Local Development Plan**

We support the compact spatial strategy for development in East Lothian. For reasons set out in the LDP, it is wise and sensible to concentrate future development in the west of the county.

Consistent with this compact strategy, we believe housing development in the North Berwick cluster area should be strictly controlled. However, the draft LDP proposes a total of 690 additional houses in the North Berwick cluster area including 100 houses in Aberlady (site NK10).

In general, we consider this level of development will place considerable additional strain on infrastructure in the county, including additional pressure from:

- providing additional school places and capacity
- improving public transport provision

- providing sufficient community space for a growing community - public recreation spaces, sports fields, access to the countryside, safe spaces for young people to socialise and for children to play
- greater pressure on roads and public transport infrastructure.

In relation to transport issues, public transport is already short on capacity in that the train service between our nearest station Longniddry and Edinburgh is already over-crowded at peak travel times. The public road network around Aberlady does not suffer from congestion. However, the network of roads in the county were mostly designed and built 50 years ago and more, when the impact of current high volumes of motor traffic on local communities was not foreseen and could not be planned for effectively. Consequently, although traffic moves relatively freely in our area, slow but seemingly inexorable growth in road traffic in recent years has made our village noisier, more polluted and more dangerous for pedestrians and cyclists.

We are concerned that the additional development in the North Berwick cluster area proposed in the draft LDP will result in further growth in road traffic which will have a disproportionately damaging and intrusive impact on the community because of the road network's largely obsolete design.

*Because of these pressures, every significant housing development proposed in the draft LDP should include mitigation to reduce and modify the demands that each development will otherwise impose on our local community infrastructure. Each proposed development should be assessed in terms of its expected impact both on the immediate locality and on local infrastructure more widely.*

We have suggestions below on how the draft LDP should be amended to help ensure that traffic and other impacts arising specifically from proposal NK10 at Aberlady West are mitigated.

### **Application of area-based policies to Aberlady**

In general we support the application of the relevant area-based policies to Aberlady and its surroundings, as illustrated in *Inset Map 3: Landscape Designations and Infrastructure Designations* and *Inset Map 5: Aberlady*, which form part of the draft LDP. In particular we support the application of policies OS1, RCA1, DC1, DC8 and CH2 to the areas indicated.

We particularly welcome policy DC8, which will help prevent insensitive development around the village boundaries to the east, west and north of Aberlady.

There appears to be a mistake in *Inset Map 5* however, which should be corrected before the LDP is confirmed. The mistake is that *Inset Map 5* includes no reference to policy CH6, although *Inset Map 3* clearly indicates that this policy should apply to the countryside immediately south of the village.

*Inset Map 5 in the LDP should be amended to show that policy CH6 applies to the countryside immediately south of the village.*

### **Proposed housing development site NK10 Aberlady West**

The Association's views about the proposed development of site NK10 are as follows.

**Access to the new development from the A198.** The LDP needs to be amended to include a new road layout to ensure safety in the vicinity of The Pleasance/ A198 junction. The existing layout of the A198 road near the proposed site also allows dangerous speeding and irresponsible driving behaviour in the area. The section of road near to the 30mph sign just west of The Pleasance/ A198 junction is notorious for rapid acceleration and speeding by some irresponsible drivers heading west out of the village. At the same time, much eastbound traffic also approaches at irresponsibly high speed.

The two existing A198 junctions a short way further west of the access to the proposed development – at the intersections with the roads to Craigiellaw cottages/ Gosford Bothy and, further west, to Craigiellaw Park - are not clearly-signed and are significant accident hazards. Some drivers overtake dangerously on this section, failing to recognise these hazardous junctions or simply ignoring them.

*The LDP should therefore be amended to provide for a new roundabout to be formed either at The Pleasance/ A198 junction or at the Gosford Bothy/ Craigiellaw Cottages junction some 250m to the west.*

The existing layout of the A198 near the proposed site is also hazardous because of the bus stops there. Children from any development on the application site - travelling for example to North Berwick High School – would have to cross the A198 every day for their bus.

*The LDP should therefore provide for a new Pelican light pedestrian crossing at The Pleasance/ A198 junction to ensure pedestrian safety.*

**Impact of the proposed development on the Mair Road.** Given the existing constraints affecting traffic flow along the A198 Main Street in Aberlady, the development of site NK10 will inevitably result in additional traffic using the Mair Road east of the site. The Mair Road is single lane and has little or no capacity for additional traffic. It does not have any foot pavement west of Glenpeffer Avenue, which makes it dangerous for pedestrians, especially children and other vulnerable people.

This is a significant problem, which must be mitigated. However, the draft LDP says nothing about this aspect of development of the NK10 site.

*To improve the safety and amenity of the Mair Road and to help manage the additional traffic that will arise if site NK10 is developed, the LDP should be revised so that it provides for:*

- *A new, separate and permanent pedestrian and cycle pavement in the field immediately south of a hedge along the southern edge of the Mair Road. This would run the whole length of Mair Road between its junction with Glenpeffer Avenue to the east and its junction with Kirk Road to the west.*
- *Additional permanent and paved vehicle passing places along the Mair Road, whilst maintaining existing speed bumps.*
- *Appropriate warning signs - “Children crossing”, “Kill your speed” or similar - along the road, particularly adjacent to the two areas noted above. These signs should also include a specific warning that the road is not suitable for HGVs and is prohibited for commercial vehicles (as in Holyrood Park).*
- *Other options for enhancing the rural character of the road and ensuring that it is a route which gives priority to the safety and amenity of pedestrians and cyclists above the convenience of motorists.*

**Social area and facilities for young people.** Currently, Aberlady does not have any formal social area for young people to meet, socialise and otherwise enjoy our community. There are several clubs in the village that provide social opportunities for young people - the Brownies, Scouts, the Bowling and Football Clubs, for example. However with the expected 22 per cent increase in the size of the village the application should include provision for a formal social area for young people.

The draft LDP is inadequate because although it will result in an estimated increase of 22 per cent in the population of the village of Aberlady it makes no proposal to help maintain the social infrastructure in the village particularly for younger people.

*The LDP should be amended to require any developer of site NK10 to include proposals to help maintain the social infrastructure in the village particularly for younger people.*

**Wider pedestrian and cycle path network.** If site NK10 is developed many of the residents of the new homes are likely to commute to work in Edinburgh, which will increase the environmentally damaging and unsustainable “drip, drip” growth in short distance trips by car. Despite the significant scale of the development proposed at site NK10, the draft LDP includes little to improve local infrastructure – pedestrian and cycle paths - that are essential to encourage alternative, greener and healthier transport methods.

*The LDP should be revised to include provision for a new, safe pedestrian/cycle-only route between Aberlady and Longniddry railway station. This would be consistent with the long-term need to provide sustainable and green transport solutions throughout East Lothian.*

**Proposed LDP Draft Development Brief for Site NK10**

Please see also our comments at **Annex 1** (page 5 below) concerning the draft development brief for site NK10.

Yours sincerely

Donald Hay  
Chair, Aberlady Community Association

## **Annex 1 Draft Development Brief for Site NK10 - Comments from Aberlady Community Association**

All references are to the draft Development Brief for Site NK10 included in pages 30-32 of the Council's *Proposed LDP Draft Development Briefs SPG Part 2*.

### **Paragraph 1 of the draft development brief**

The Association agrees with the requirement that the development of site NK10 should not harm its setting within the Aberlady conservation area. We also support the architectural requirements in the same paragraph that any development should reflect the character of Elcho Terrace and The Pleasance.

### **Paragraph 2**

We refer to our covering letter pages 2 and 3 "Access to the new development from the A198".

*The draft development brief for site NK10 should be adjusted so that it provides for a new roundabout to be formed either at The Pleasance/ A198 junction or at the Gosford Bothy/ Craigielaw Cottages junction some 250m to the west.*

*The development brief should also provide for a new Pelican light pedestrian crossing at The Pleasance/ A198 junction to ensure pedestrian safety.*

### **Paragraph 3**

We agree with the requirements in the draft development brief concerning the need for landscaping to integrate any development of site NK10 as sympathetically as possible into the surrounding countryside.

### **Paragraph 4**

We agree with the requirements in of the draft development brief concerning the development of the south-east side of the site by Kirk Road.

*Additionally the draft development brief should be adjusted to include a requirement for any developer to propose measures to help improve the safety and amenity of the Mair Road to the east of the site.*

Please refer to our specific suggestions for such measures on page 3 of our letter above.

### **Paragraph 5**

We support the requirement for public open space to be incorporated on the western edge of the site.

### **Paragraph 6**

We support the requirement for an appropriately surfaced path to be provided to give access to Gosford Bothy Farm Shop.

*The draft development brief should be clarified to specify that this path should be usable by both pedestrians and cyclists.*

### **Paragraph 7**

We support the requirement for safe and easy walking and cycling routes from the development of site NK10 to the village centre should be provided.

As noted in pages 3 and 4 of our letter above, we consider the draft LDP should be revised to provide for a new safe pedestrian/ cycle-only route between Aberlady and Longniddry railway station.

*The draft development brief should be adjusted to require any developer of site NK10 to propose measures to support improvement in local pedestrian and cycle paths in accordance with the LDP.*



**From:**  
**To:** [Local Development Plan](#)  
**Subject:** GULLANE L P D  
**Date:** 01 November 2016 16:47:04

---

1. I Object to proposed development of Saltcoats Field & Fenton Gait East & South as this with the Fire College site would result in an unsustainable increase in the population of 30%.
2. The infrastructure will be inadequate with poor access to employment and services. The effect on tourism & recreation will be unsatisfactory having regard to the scale.
3. The general increase in traffic overall will result in noise & pollution spoiling the amenity & quality of life. The main road through is becoming a rat run. The C111 to West Fenton is unsuitable to service the Saltcoats Field housing.
4. Parking at the railway stations will not meet the demand. Most of the new working residents will have to commute by car to work in Edinburgh as no indications of significant economic advancement are indicated in the plan.
5. Development of the two large green field sites will be likely to jeopardise redevelopment of the Fire College brown field site as this is not so viable.
6. Extending the school by two class rooms only will be insufficient. Unlikely that adequate numbers of Nurses & Doctors will be provided.
7. The existing village centre was not designed to accommodate & serve the proposed increase in population and cannot readily do so without major redevelopment e.g. no car parks or cycle paths are intended & the community hall will be too small.

Mary.M.McCreath.

## East Lothian Proposed Local Development Plan

### RSPB Scotland comments

#### Introduction

Growing our communities (1.27 and 2.8). Although there are rather few “meaningful” brownfield sites suitable for redevelopment in East Lothian, such areas often support a greater richness and diversity of biodiversity, especially invertebrates and plants, than undeveloped agricultural land (which is generally poor for wildlife). Any development proposed for brownfield should, therefore, take into account existing biodiversity features and mitigate against their potential loss. Stirling Council have produced a biodiversity checklist which allows applicants and planning officers to identify those developments which may have an impact on the natural environment. It allows developers and applicants to identify and address any nature conservation issues before a planning application is submitted. It also enables planning officers to determine what information is required to adequately assess the effects of development upon biodiversity and ensure that the proposed development will meet the Council’s biodiversity objectives. This is a good practice example which East Lothian Council should consider adopting. See, for example:

<http://www.stirling.gov.uk/documents/temporary-uploads/economy,-planning- and -regulation/supp-guidance-sept-2012/sg26-biodiversity.pdf>

Infrastructure & Resources (1.30). We support the reinstatement of a railway station at East Linton. This would help reduce road traffic and, thereby, CO<sub>2</sub> emissions.

1.32 - We support the Council’s aspiration for active travel and the provision of infrastructure (cycle-ways, footpaths) to support that.

#### Spatial Strategy

Musselburgh Cluster (2.47). Musselburgh Lagoons/Levenhall Links. The reclamation of intertidal mudflat feeding grounds for wintering waders and other birds was a significant loss to the qualifying features of the Firth of Forth SPA and have not been compensated for. We would wish to see detailed proposals for the opportunities referred to for further habitat improvement at the lagoons. Furthermore, any development at the site of the former Cockenzie Power Station should not impact on the SPA, directly or indirectly (section 2.51 refers; the future of the site is as yet undecided).

Prop MH18. We commend the aim to improve the availability of suitable habitat for qualifying interests (bird species) of the Firth of Forth SPA.

Blindwells Cluster Prop BW1. Blindwells. No allowance has been made for environmental features and biodiversity enhancement/maintenance in the Blindwells’ proposal. This and other proposed developments should include detailed proposals for biodiversity enhancement of new building projects to benefit wildlife and to make

the sites more attractive for people. Our letter of 21 November 2014 to your council in response to development proposals for the site also refers.

### **Energy Generation, Distribution & Transmission**

4.62 *et seq.* We commend the inclusion of targets for energy generation by renewables to address climate change. We also welcome the section on heat and would like to see the Council's heat map published as soon as possible.

For further information on RSPB's approach to this issue, please refer to:

<https://www.rspb.org.uk/our-work/conservation/conservation-projects/details/350939-energy-futures-resource-constraints-and-sensitivity-mapping-for-renewable-energy-in-the-uk>

4.63, and 4.88-92 and Prop EGT1. Clarification of the future use of the site of the Cockenzie Power Station will be required. Future development here will require consideration of potential impacts on the adjacent Firth of Forth SPA and a Habitats Regulations Appraisal (HRA) should be undertaken at an early stage.

Any plan for the site of the former power station should also take cognisance of the former ash lagoons to the west, as the two (the power station and the lagoons) are directly related. The existing plans for the unrestored lagoons put forward by ScottishPower, and which are supported by RSPB Scotland, should be expedited as soon as possible. These involve the restoration of lagoon 8 to a wader roost, and the creation of mixed wildlife habitat on lagoon 6. The lagoons complex and adjacent woodland and grassland areas of Levenhall Links area should be designated as a Local Nature Reserve. This designation would afford the area a certain level of protection through Policy NH3.

4.67. A key way to reduce energy consumption is to improve the thermal efficiency of new build and to include micro-generation within them, notably solar panels. Such measures should be a requirement of all new build if the effects of climate change are going to be more effectively addressed. All new public build (notably schools) should include solar panels and other appropriate renewable forms of energy generation. A more affirmative statement by the Council in this section is required in this regard.

Reduced travel remains a separate issue in reducing energy demand, but one that we would support.

Policy WD1 – Wind farms . The reference to 'Habitats Directive' should be changed to 'Birds and Habitats Directives'. This applies throughout this section.

PROP EGT3: Forth Coast Area of Co-ordinated Action. We support the measures/restrictions detailed here, notably the need to take cognisance of the Firth of Forth SPA (which does not extend to Torness) and to combine infrastructure wherever possible.

4.99 Enhanced High Voltage Electricity Transmission Network. New overhead lines that traverse areas known to be on feeding grounds or regular flight paths for birds such as geese and swans should be marked with high visibility reflectors to minimise bird collision risk.

## **Minerals**

### **Policy MIN8 - Mineral Extraction Criteria**

Granting consent for new open-cast coal mining in East Lothian would be contrary to the requirements of Part 4 the Climate Change (Scotland) Act, 2009, which requires public bodies to exercise their functions in the way that they consider most sustainable. We do not believe that any proposal for open-cast coal mining in East Lothian can be considered acceptable or sustainable.

We note that the restoration of mineral extraction sites covers financial guarantees. We recommend that financial guarantees should be secured via planning condition/planning obligations for all developments with significant restoration, decommissioning, aftercare or mitigation liabilities. The type of guarantee should be chosen carefully to minimise the risk that restoration will not take place or costs fall to the taxpayer. The costs of ongoing monitoring should also be considered as part of the overall costs. East Ayrshire has produced specific guidance on the different types of financial guarantees and level of risk. See:

<https://www.east-ayrshire.gov.uk/Resources/PDF/L/LDP-Financial-Guarantees.pdf>

We would welcome further guidance on financial guarantees as part of East Lothian Council's proposed plan / supplementary guidance. Section 4.80 and policy WD6 (decommissioning of wind farms) is also pertinent in this context.

Notwithstanding our objection to any new open-cast coal mining in the Council area, we support the criteria listed in this policy.

### **Policy MIN9 - Supporting Information**

The requirement for mineral workings, when exhausted, to be restored to prime agricultural land where such existed before mining commenced, should be flexible in the case of the limestone extraction at Oxwell Mains (Barns Ness), Dunbar.

Ongoing, phased restoration of newly worked limestone deposits at Oxwell Mains should be undertaken for nature conservation interests. This would consolidate and extend the restoration for biodiversity that is being undertaken at North West Quarry, directly adjacent to the current active quarrying area.

The potential exists at Oxwell Mains to create a significant protected area for wildlife and a major asset for the residents of Dunbar and for visitors from within and outwith East Lothian. By the time that the area is exhausted of its minerals, a significant amount of valuable habitat could have been created between NW Quarry and Dry Burn. Infrastructure and other facilities can then be introduced to cater for visitors and for educational needs.

There is no other undeveloped or uncultivated land available in the Council area that could provide such a valuable resource. This is a unique opportunity for East Lothian which, together with the existing Musselburgh lagoons/Levenhall complex at the west end of the county, would make a major biodiversity and tourism asset for East Lothian.

## **Our Natural & Cultural Heritage**

Tree and woodlands. East Lothian is a sparsely wooded county. Efforts should be made to increase the cover/area of native deciduous woodland, particularly in the

Lammermuir cleughs and adjacent areas. Block planting of exotic conifers (notably Sitka spruce) would be undesirable from the biodiversity and landscape points of view. Planting of appropriate native tree, shrub and wildflower species in new housing and commercial developments and alongside roads and the core paths and other recreational routes would make an important contribution to biodiversity enhancement without taking away from productive agricultural land.

6.27 SUDS. Reference should be made to the best practice guidance on Sustainable Urban Drainage Systems and Wildlife:

[http://www.rspb.org.uk/Images/SuDS\\_report\\_final\\_tcm9-338064.pdf](http://www.rspb.org.uk/Images/SuDS_report_final_tcm9-338064.pdf)

Policy NH11 - Natural flood management measures should be adopted where possible to contribute towards flood prevention and mitigation and this requirement should be included somewhere in this policy (or a separate policy).

### **Strategic Environmental Assessment**

Flooding (page 33). Although the threat posed by fluvial flooding is at present relatively low and restricted to a small number of properties (mainly in Haddington), natural flood management measures should be adopted wherever possible, in conjunction as necessary with “hard” flood defences. The natural measures should include native-tree planting in the upper River Tyne catchment and along riparian areas of the main river and its tributaries where trees have been removed or the bank is closely encroached upon by agriculture and development. This has the potential to hold back water for slow release and militate against flooding down stream. Such steps would also contribute significantly to biodiversity enhancement of the county.

Natural Heritage (Biodiversity, Flora and fauna) (3.2.5 page 39) - The identification and designation of Local Biodiversity sites (LBS) in East Lothian should be expedited so that the remaining important natural habitats and features of the county can be effectively conserved and protected against inappropriate development.

### **Consultation question 12. Planning for housing**

We agree that housing could be accommodated in the west of the county without having a negative impact on the Firth of Forth SPA. Any development would, however, require rigorous assessment together including an HRA. The potential impact of a local population increase (recreational disturbance) on the SPA should also be taken into account. Increased usage of, for example, Levenhall Links, has the potential to cause disturbance to those birds that are qualifying features of the SPA. For this reason, the lagoons complex, including the planned restoration of lagoons 6 and 8, should incorporate infrastructure that allows people to view the wildlife without disturbing it.

Similarly, the proposed housing developments at Dunbar will likely result in increased usage of the coast to the east of Dunbar. For this reason, the creation of wildlife habitats, and the infrastructure to allow for managed recreational and education experience of the wildlife, at the Oxwell Mains limestone quarry should be a high priority. Such measures will provide the people of Dunbar and the wider region with a unique and valuable asset, and afford protection to wildlife such that the council's biodiversity aims and obligations can be more effectively addressed.

### Consultation question 18. Central Scotland Green Network

We commend the adoption of and involvement in the CSGN and the aim to have a positive effect on biodiversity. This may be achieved through, inter alia, appropriate planting of native plant tree, shrub and wildflower species wherever possible.

### Consultation question 24. Developer contributions

No mention is made of developer contributions to environmental mitigation or enhancement. Developers should, in our opinion, be obliged to make provision for the enhancement of natural features and biodiversity within developments or, if this is not feasible, on suitable sites elsewhere. These should include habitat creation. We are aware that other councils, including Dumfries and Galloway, Falkirk, and Stirling, have this requirement within their LDP. We would encourage East Lothian to do likewise.

### Consultation question 28. Energy, including renewable energy

We would not support the construction of a thermal energy generation facility on the site of the former Cockenzie Power Station. There would be both likely potential impacts on qualifying species of the Firth of Forth SPA and certain impacts on CO<sub>2</sub> emissions and climate targets and, consequently, on biodiversity.

The combined impact of the various technologies (thermal, wind etc) proposed for the site are predicted to have a “neutral” effect on climate. The aim should rather be to have a positive effect *ie*, the overall reduction of CO<sub>2</sub> emissions as a result of any development.

### Consultation Question 30. Minerals, Including Aggregates & Coal

We support the proposed policy approach of not identifying a search for open-cast coal mining. In general, RSPB Scotland believes that further expansion of the open-cast coal industry is incompatible with the Scottish Government’s climate change targets and legislation. We have significant concerns about the potential for any new or extended open-cast coal sites. Furthermore, the failure of both the industry and the regulatory system to deliver appropriate mitigation and restoration through conditions, legal agreements and bonds and to monitor and enforce the implementation of these measures is of serious concern.

We are also concerned about the potential climate-change impacts and cumulative impacts on wildlife of developing unconventional gas in Scotland. Other environmental risks include potential water contamination and methane release. We would encourage any policy developed by East Lothian Council to include wording to ensure that where uncertainty exists in relation to these issues, a precautionary approach will be taken. RSPB Scotland is strongly urging the Scottish Government to amend Scottish Planning Policy (SPP) to include a presumption against any unconventional gas development until climate and environmental risks have been properly dealt with. See, for example, our joint statement with other NGOs through Scottish Environment LINK:

<http://www.scotlink.org/files/policy/ParliamentaryBriefings/LINKBriefingFUGJune13.pdf>

We would not support the “reasonable alternative” of identifying a potential area of search for coal mining.

#### Appendix 5. Musselburgh area.

Monktonhall Terrace. This is a small area proposed for development but, from the aerial photograph supplied, contains scrub and grassland habitat that is likely to support a variety of birds and wildflowers. The loss of such valuable pockets of habitat ('vacant' ground or brownfield) can have considerable negative consequences for biodiversity, especially in a county where the majority of land is either intensively cultivated or under development. An ecological/biodiversity assessment should be carried out at this site, including a breeding birds survey. As much of the scrub habitat as possible should remain intact, and any loss should be mitigated for by compensatory habitat creation elsewhere. No development should take place on the flood plain.

#### Appendix 6. Prestonpans

##### Cockenzie Power Station and Coalyard

This site is bounded on its east and west seaward sides by the Firth of Forth SPA. Any development will require an HRA to determine any potential impacts on the SPA and its qualifying features. Furthermore, any development should conserve areas of meadow grassland and scrub wherever possible.

##### Dolphingstone Farm

The existing scrub and trees here should be protected from any development and planting undertaken to create and maintain connectivity.

##### Prestongrange Museum

The woodland here should be retained and managed to enhance biodiversity (e.g. by the removal of non-native species).

##### Wallyford

The area of scrub/woodland within this proposed development site should be left intact and enhanced for biodiversity as appropriate.

#### Appendix 8. Haddington

##### Liberty Hall

The native woodland here should be retained or, if any is removed, then compensatory [planting of native species should be undertaken at a suitable site. Any remaining woodland should be managed for biodiversity interests.

##### Land at Liberty Hall

This site contains woodland that should be retained and managed for biodiversity interest. Smallholding development is not necessarily compatible with wider biodiversity, and should not involve the removal of native trees and scrub.

## Appendix 9 Dunbar area

### North West Quarry

We strongly support the restoration and management of this site for nature conservation purposes, combined with ecotourism and environmental education. RSPB Scotland has been involved in the deliberations over the future of this site. We also strongly advocate the restoration of the new limestone working to the east for nature conservation purposes so that a larger, more ecologically functional and robust site can be created. This would have major significance for biodiversity and people and create a site not just unique in East Lothian but in Scotland.

## Appendix 10. North Berwick catchment

### Bickerton Fields, Aberlady

Although buffered by the main road, this site is adjacent to Aberlady Bay LNR, part of the Firth of Forth SPA. Any potential direct or indirect impact on the qualifying features of the SPA would, therefore, need to be assessed before any development could take place.

*Mike Fraser  
Conservation Officer  
RSPB Scotland*

01 November 2016



**From:**  
**To:** [Local Development Plan](#)  
**Subject:** Objection to Local Development Plan  
**Date:** 01 November 2016 19:44:18

---

Dear Sirs,

I am lodging my objections to the East Lothian Local Development Plan, namely to object to the inclusion of SALTCOATS (NK7), FENTON GAIT EAST (NK8) and FENTON GAIT SOUTH (NK9) within the LDP and request that these be removed.

I object on the following grounds

- The cumulative impact of these three sites is totally out of proportion to the sustainable development of Gullane as a community and cannot be supported by the local infrastructure in terms of the medical, educational, road safety, transport, ecological, and broader environmental impact.
- The fact that there is an extensive brownfield site at the former Fire School, which has to be developed or else will fall into disrepair, is a future necessary development which adds to the cumulative impact of these three proposed sites stated above. The community acknowledges the need for further development of the Fire School site, but that makes the three proposed greenfield sites unnecessary and impossible to sustain. They should not be in the plan.
- The inclusion of all four sites in the LDP is totally unacceptable, unfair and will impose impossible pressures on the local community.
- I am deeply concerned at the road safety implications, living as I do at the junction of the West Fenton Road and the Main Street. At present it is difficult and dangerous getting out of Muirfield Park on to the main road. The proposed sites above will increase the pressure to intolerable proportions and increase the danger to motorists and pedestrians alike.
- Current public transport facilities, particularly the station at Drem are inadequate at present and would be impossible if a development of this scale went ahead.
- Community facilities like the Day Centre, medical centre and village hall cannot sustain this scale of development.
- The distance of the proposed Fenton Gait East and Fenton Gait South from any of the current community facilities will necessitate car travel to reach necessary facilities. Parking and road safety are currently bad enough. The impact of further development would be unacceptable.
- Cala Homes statements about pedestrian safety and having a pavement and street lighting on the West Fenton road are total nonsense and call into question their integrity with regard to their assessment of the impact of the developments on Gullane.

The council and Cala have failed to assess adequately the cumulative impact of the proposed developments on the Gullane Community, the A198 and the rural road network, particularly the West Fenton Road.

I wish my objections to be acknowledged

Elizabeth MacCallum

Yvonne Barbara Haycock

2 November 2016

Dear Sir/Madam,  
Local Plan – 16/00018/LDP

I am writing to formally object to the inclusion of the field east of Fentoun Gait known as Fenton East under the above reference.

I know that 29 years ago and over the period since I purchased my home, I was assured that the boundary to Gullane and that the village boundary would not be extended eastward which is what is happening by the inclusion of this land.

I object to the inclusion of this Greenfield site in the local plan when there are brown field sites available for building on.

From the local plan I can see that all residents in Fentoun Gait and Muirfield Steading will be entombed by building works on three sides of their properties if the plan is to allow building on all three sites at once as well as the fire college making four sites in all. The peace and quiet will be interrupted for at least 10 years which is alarming and frightening to think you will allow four building sites in one area of the village and have no regard for the residents who will have to put up with the noise and pollution for a prolonged period not to mention an increase in East Lothian's carbon footprint.

The developments are not sustainable, having poor access to employment and services. They would damage future opportunities for leisure and recreation in one of the region's most attractive visitor locations and have negative impacts on the amenities for locals as well as visitors.

On looking at the local plan and the planning applications proposed for these sites I feel this to be an over-development on a scale beyond that which is reasonable. Having 3 to 4 major sites concentrated in the East of the village with an unprecedented 30% growth in the village.

I know the council is under pressure to release building land but the inclusion of ALL 4 sites in the LDP is grossly unbalanced and totally ignores the capacity of Gullane to absorb it. If all these 4 sites remain Gullane will contribute 50% of all the new sites from the North Berwick Coastal area.

I would question if anybody has looked at the cumulative impact on Gullane and what it would do to the rural road networks namely C111 towards West Fenton and the main A198. The increase in road traffic will be too much for the roads to accommodate.

Train capacity has now been exceeded and access to parking in and around the local stations has reached saturation and will only get worse in the future. Even with further parking capacity the trains are full to overcapacity now so further parking will not alleviate the lack of seating on the trains.

All shops are to the west end of the village and vehicle traffic would be increased in the village with such a large scale build at the east end of the village.

This large scale build would effectively have a negative effect on Gullane's Conservation Area and would affectively have a negative impact on its amenity and create road safety issues arising from awkward parking.

Why are two major Greenfield sites included in the plan which will ultimately make the brown field site namely the old fire college not as promising against virgin fields? This will ultimately see the site languish and become a ruin and an eyesore to the village.

I see a period of 10 years or more of heavy vehicular traffic which will have an impact on the environment and to the detriment of inhabitants both people and wildlife as well as impacting on tourism. The geese settle in the fields at Fenton East and the numbers have been reducing year on year and any building work will add further in the reduction in numbers.

According to the proposal from East Lothian Council only two additional classrooms are to be factored in were all the sites to proceed is totally inadequate.

Recent housing developments in Gullane have resulted in an average of 1 school pupil per new house. This makes nonsense of proposing only two new classrooms to be built.

Although we have an all singing all dancing new doctor's surgery we still do not have the capacity to increase their workload with the amount of increase in Gullane and surrounding areas. These fears have been raised by the GP's themselves.

On reading the recorder's dismissal of Crudens/Cala proposed appeal on Fenton East on 17<sup>th</sup> February 2000 he listed the following:

1. He quoted the Secretary of State July 1997 coastal villages plan where the policy presumes against development on agricultural or forestry land.
2. Although Crudens/Cala mentioned that the area would benefit from the building in Fenton East. The recorder stated that the regional council supported and encouraged urban areas, improvement of the housing stock conversion of existing buildings development and redevelopment of brownfield sites.
3. The strategical locations for major new housing developments LSP – state criteria must influence :-
  - Closer relationships between jobs and homes.
  - Infrastructure.
  - Protection of landscapes.
  - Enviromentally sensitive Towns & Villages
  - Marketability.
  - Green Belt taken into account.
  - Pointed out the building work at Dunbar and North Berwick absorbed the new builds without needing major infrastructure or detracting from their landscapes or settings.
  - He pointed out areas of restraint were small settlements and coastal villages are concerned.
  - LSP environment policies and proposals to maintain and enhance conservation areas and protected listed buildings.

- He quoted policy ENN18 which presumes against development on prime quality agricultural land – Fenton East is not farmed as owned by Crudens but prior to a builder owning the land it was farmed.
  - Policy ENV21B protection of historic gardens and designed landscapes. Namely Greywalls
  - LSP environment policies and proposals policy ENV5 maintain and enhance conservation area and protected buildings.
  - Policy ENV18B protection of historic gardens and designed landscapes.
4. The recorder stated that there should be no building work to the detriment of the character and landscape setting of the village.
  5. He stated that West Fenton Road was a narrow country lane that would have to be improved.
  6. Documents SDD circular 18/1987 stresses the need to ensure character and landscaping setting of small towns and villages are not affective unacceptably. Good design will not be sufficient to offset detrimental effects on landscape.
  7. Natural heritage NPP G15 rural development & PAN44 stress the importance of fit in the landscape.
  8. He acknowledged that the protection of the landscape setting of settlements in the eastern part of Gullane and the historic Greywalls setting should not be interfered with by any build.

He concluded that after considering the extent to which the appeal proposals could be made acceptable by conditions which would redeem the disadvantages of the site which he concluded would be unsuitable for development and he dismissed the appeal.

I cannot see that anything has changed to make Fenton East acceptable to be included in the LDP. It was made quite clear that nothing should be built in the East Field as the build was not in keeping with the village and would effectively extend the natural boundary and exceed the small build policy of building in coastal areas. Fentoun Gait was a brown field site and this build completed the edge of the village. Extending the boundary would impinge on Greywalls and that is what the recorder said should not happen.

Once you extend the boundaries of the village when do you call a halt? As once allowed you open up the flood gates for other incursions into farmland and once you have allowed this you cannot reclaim what has gone before that is why I do not see that this parcel of land should be included in the local plan.

When I looked I still was residing in a coastal village in spitting distance to Grey walls and the recorder's decision in 2000 not to allow the build should stand as I do not see that circumstances have changed to alter the original decision.

Your current LDP does include coastal villages it also makes it plain that Grey Walls' aspects should not be blighted and if building on the East field to Gullane be allowed then this would be the case and would go against an earlier refusal by a recorder for the Secretary of State to Scotland. The east boundary of Gullane should not be extended and therefore should not be included in the LDP as any building would detract from the historical outlook from Greywalls.

This field should be withdrawn from the LDP.

Yours faithfully

Yvonne B Haycock (Mrs)  
(E Mailed)

**From:**  
**To:** [Local Development Plan](#)  
**Cc:** [Policy & Projects](#); "["](#)"  
**Subject:** East Lothian Council Proposed LDP Representation: Monkrigg Road, Haddington - Representation on behalf of Messrs R and A Kennedy  
**Date:** 02 November 2016 11:53:14  
**Attachments:** [ELC Proposed LDP - Monkrigg Road Haddington Submission 11-16.pdf](#)  
[Document 1 - Monkrigg Road, Haddington - Location Plans.pdf](#)  
[Document 2 - Housing An Ageing Population.pdf](#)  
[Document 3 - Monkrigg Road - ELC Site Assessment.pdf](#)

---

Please find attached a representation on behalf of **Messrs R and A Kennedy**, Seggarsdean Farm, Haddington, EH41 4LD related to the inclusion of the identified site at **Monkrigg Road, Haddington** for retirement development and alterations to **Policy HOU3**. This representation comprises a statement outlining the changes sought to the Proposed LDP along with the reasoning for seeking changes, and 3 related documents as follows: -

*Document 1* – Site Location Plans

*Document 2* – Housing an Ageing Population (report)

*Document 3* – East Lothian Council's Site Assessment (MIR stage)

**Grateful if you could confirm receipt.**

Kind Regards

Malcolm Smith

Director

**TMS PLANNING AND DEVELOPMENT SERVICES LTD**

"Balclune", 32 Clune Road, Gowkhall, Fife, KY12 9NZ

Tel: (01383) 853066 Mob: 07723320517

E-mail: [tmsplanning@tiscali.co.uk](mailto:tmsplanning@tiscali.co.uk)

This email has been scanned by BullGuard antivirus protection.  
For more info visit [www.bullguard.com](http://www.bullguard.com)

## REPRESENTATION OF BEHALF OF R AND A KENNEDY RELATED TO LAND AT MONKRIGG ROAD, HADDINGTON - RETIREMENT DEVELOPMENT

### Changes sought to Local Development Plan

- The subject site at Monkrigg Road, Haddington (Document 1 refers) should be allocated for retirement development to include housing exclusively for the over 55 age group and related facilities to serve this specialist housing provision;
- Policy HOU3 “Affordable Housing Quota” and Policy DEL1 “Infrastructure and Facilities Provision” and all related policies and guidance including the Developer Contributions Framework (Table1) should be altered to remove the obligation for specialist or special needs housing development, including housing specifically designed to meet the needs of the over 55 age group, to provide for 25% affordable housing. Policy HOU3 should be altered to state (text to be added at the end of the first paragraph): -

*“Housing development specifically designed to meet specialist or special needs, including housing specifically designed to meet the needs of the over 55 age group, will be excluded from this requirement where the continued age related occupation of such development is controlled”.*

### 1.0 BACKGROUND/CONTEXT

1.1 It is established that there has been, and continues to be, notable changes in population levels and population age profiles throughout Scotland, including East Lothian, and that this continues to result in the Scottish housing market failing to meet identified needs including those arising from growing sectors of the population, particularly those approaching and past retirement age. Without positive action existing problems will be compounded. The demographic time bomb and the policy failures to address this, including within the planning system, are well known but are simply not being addressed.

1.2 The findings of the annual reports of the Registrar General of Births, Deaths and Marriages for Scotland continually show: -

- Scotland’s population reaching all-time highs;
- Scotland’s population continues to age;
- Life expectancy in Scotland has improved significantly in the past 25 years. People born today can expect to live to 80.6 for women and 76.1 for men;

- The number of households is also increasing as a result of the ageing population and because more people are living alone or in smaller households; and
- Latest projections suggest that Scotland's population will go on rising, to 5.76 million by 2035, and age significantly, with the number of people aged 65 or over rising by 63% from 0.88 million to 1.43 million in the same period.

1.3 The Registrar General of Births, Deaths and Marriages for Scotland advises that *"The information, trends and statistics ... include indications of the potential for some significant changes in the future structure of Scotland's population, particularly in terms of its age profile and living arrangements, which will be highly pertinent to policy makers and service providers"*. There are clear implications for social and health care policy arising from these changing demographics, and the positive provision of appropriate living arrangements for the increasingly elderly population is also a significant issue requiring to be addressed.

1.4 While age is not necessarily a barrier to mobility or leading an active life, an increasingly ageing population, in percentage terms and overall numbers, raises issues with respect to the ability of the established housing stock, largely family-sized homes, to meet the future needs of an ageing population. Typically living in smaller households and with less space requirements, "retirement" living arrangements are directly impacted by the (lack of) suitability of the existing housing stock. There is already a significant shortfall of suitable housing with few, if any, new developments making adequate provision for ageing sectors of the population. This restricts choice and often leads to people living in family sized houses (significant levels of under-occupation) no longer suitable for their needs presently or going forward, a position that is often not readily seen but occurring nonetheless and impacting significantly on the quality of life being enjoyed. The provision of suitable accommodation within an appropriate and secure living environment is fundamental to meeting the wide and often complex range of needs arising from the ageing population in Scotland and in the wider UK.

1.5 In addition to housing provision and health care, there are recognised social impacts of the ongoing demographic changes. Recent studies have suggested that lack of social interaction can promote loneliness and that the elderly population, due to reducing mobility and no longer being in work, are particularly effected. This can lead not just to a significantly poorer quality of life but also to a range of related health problems. The process of delivering housing and support to serve the needs of the increasing numbers of elderly in the UK is high on the policy agenda but not an issue being satisfactorily addressed. Document 2 *"Housing an Ageing Population"* outlines the range of issues presently involved.

1.6 While the Scottish Government, Local Authorities, the National Health Service et al, recognise the demographic changes set out by the Registrar General there is a lack of meaningfully and positive response. The crux, in many respects, is the inadequacy of



suitable housing provision and issues with on-going health and social care arrangements, in effect a lack of policy response/joined up thinking.

1.7 The mainstream private housing sector fails to make provision for the homes and related environments, including the range of bespoke housing, social and health care facilities, required to cater for the needs of many elderly residents. Local Authorities and Housing Associations are also not sufficiently funded in order to cater for the range of housing and related needs identified, or the increasing levels of demand. Each sector can assist the overall provision and many elderly residents will presently be well served in the housing market (individual circumstances will vary), however there is clearly a place for the type of bespoke retirement development (purpose built properties on one level affording ready accessibility and a level of support allowing people to “trade down” to smaller homes) being proposed at Monkkrigg Road, Haddington; one incorporating an range of housing and amenity/leisure provision designed to meet the daily needs of the resident population, including their social integration and health, and to provide a full-life residency option going forward. Access to health and wellbeing facilities can also be provided as part of the occupancy package.

1.8 While planning policy at all levels recognises the need for additional housing to cater for the needs of Scotland’s increasing elderly population, there is little concerted action aimed at meeting these needs and no detailed policy framework to assist such provision. In addition, there is little consideration to the holistic needs of this sector of the population in terms of housing, health, social integration/interaction, and related physical and emotional wellbeing. Retirement developments/villages operate successfully elsewhere in the UK and, while individual circumstances will differ in terms of scale and facilities offered, they offer an important and valued resource to resident and to local communities generally, and provide valuable employment opportunities.

1.9 The form of retirement development requires to be tailored for each situation. They are not viable on allocated residential sites due to the additional costs and non-mainstream funding often required (simply retirement development is not a well-established market and therefore any unnecessary constraints to its development can have significant deliverability implications) and the imposition of further costs such as those related to affordable housing simply ensures that such development is unlikely to occur, notwithstanding that it is badly needed. Typically, residents above the age of 55 (the average age in such development in England is around 80) are often fully capable to deal with their daily needs on entry to the “village”. Over time this may change and with the support of the managing company and the retirement community and access to services and assistance (as required) there is a far higher chance that people can remain independent in their own homes, rather than having to go into a nursing homes (as appears to be East Lothian Council’s current approach). The “village” is a location where bespoke housing exists for the smaller households, these comprising modern properties easy to heat and maintain. This also allows the freeing up of family homes elsewhere and the far more efficient use of the housing stock generally.

## 2.0 EAST LoTHIAN DEMOGRAPHICS

2.1 Proposed LDP paragraph 1.19 states that: -

*“The National Records of Scotland 2010 population projection (published 2012) anticipates that by 2035 East Lothian’s population will increase by 33% to around 129,229, the highest percentage rate of growth in Scotland during this period. ... The pensionable age population is expected to increase by 43%, and the number of people aged over 75 is expected to increase by 95%”.*

2.2 Additionally, LDP paragraph 3.28 confirms “...support for the principle of specialist housing provision and provision for specific housing needs”. Despite this, there is in fact little support anywhere in the LDP to assist the delivery of such, much needed, housing provision and certainly no specific support for housing to meet the needs of the increasing levels of elderly residents. This is a fundamental failure of the emerging LDP.

2.3 Being fully aware of the demographic time bomb, as indicated above, the LDP proposes **absolutely nothing** in order to seek to help address current and exponentially growing shortfalls in suitable residential provision for the growing numbers of elderly residents in East Lothian. The LDP (page 71) does identify “a number of closures of nursing and residential homes in East Lothian, resulting in a significant reduction in the number of places available”. The LDP further identifies that this is occurring “at the same time the number of very elderly people in East Lothian is rising and this is projected to grow over the plan period”. It is additionally recognised that “the fall in provision of such accommodation coupled with the rise in demand means that unless there is a positive policy context for provision of accommodation for older people, they may have to wait longer for placements”. The proposed response is to try to stem the closure of Care Homes by virtue of Policy HOU5 “Residential Care & Nursing Homes”. While the approach being adopted via Policy HOU5 may be laudable this is a drop in the ocean. Not all elderly people require care home provision to meet their residential and care needs, this is a relatively small percentage of the growing demands being placed on the housing stock.

2.3 The lack of any positive provision for retirement style development is a fundamental failing in the emerging LDP, one that can be readily addressed by a pragmatic allocation followed by a tailored solution in conjunction with the developer and the relevant stakeholders.

## 3.0 THE RETIREMENT DEVELOPMENT/VILLAGE CONCEPT

3.1 As set out above, there is an unmet need and a rising demand presently for housing to meet the needs of a growing elderly population within East Lothian, a need that will only be partially met by the public sector, and for which private sector provision is now required in the short, medium and longer terms. There is presently confirmed development/operator interest in the provision of retirement

development/village in Haddington and no availability of land within the present land allocations to accommodate this both for practical and financial reasons.

3.2 The Retirement Village is not a residential development in the conventional sense, neither is it simply a development catering for the residential needs of the more mature sectors of the population (such as the McCarthy and Stone model). The Retirement Village is far more than a place to live it is a place to secure a lifestyle where residents have access to a range of accommodation, healthcare, leisure, and other facilities, in a safe and secure environment specifically designed for an ageing population and their needs individually and collectively.

3.3 Accommodation within the village will be tailored to a range of needs related to the support requirements of the residents, with all properties having adaptability built in. Restrictions on the age range of residents (either from age 55 or age 60 upwards but mainly catering for age 65+) will be controlled legally by property sales with the operator retaining a direct interest in all transactions. A Section 75 agreement restricting occupancy would also be secured along with any planning permission

3.4 The ability to identify and meet the individual needs of residents within the physical form (layout, accessibility, facilities, etc) and operational arrangements in the Retirement Village renders it a truly unique facility to address the residential, social, leisure needs of residents, in effect a very positive response to the issues arising from the readily identifiable needs of this growing sector of the population.

#### **4.0 MONKRIGG ROAD, HADDINGTON- THE SITE/PROPOSAL**

4.1 The site proposed for a retirement development/village is located at the south-east of Haddington, south of Monkrigg Road. It is a relatively level site (falling to the south) adjacent to an established residential area and with ready access on foot, by bus, and by car to Haddington town centre and the range of commercial, social and health related facilities available. The site is within a 10 minute walk of the town centre, a pleasant, partially riverside, walk with few gradients. A bus service to the town centre is accessed from a bus stop on Monkmain Road, a short distance from the site.

4.2 The site assessment set out by East Lothian Council at the MIR stage (Document 3) confirms that the site/development is seen as: -

- Well related to Haddington;
- Within 400 metres of a bus stop;
- Within walking distance of a range of local facilities;
- Suitable for the proposed use and compatible with adjacent uses;
- Able to be satisfactorily accessed/integrated;
- Having no known delivery constraints;
- Having no negative habit impacts;
- A positive way of meeting the needs of a growing elderly population;

- Having good access/accessibility to Haddington Town Centre and community facilities;
- Not at risk of flooding;
- Not having any negative cultural heritage impacts; and
- Having potential to mitigate landscape impacts.

4.3 Based on the MIR assessment, it is clear that the location/integration/accessibility of the site along with the positive provision for a largely unmet demographic need within the local area (and elsewhere in East Lothian) would represent a positive planning response to the relevant issues. The assessment set out by the Council is positive for this established requirement and therefore the lack of an allocation for the site is surprising. Inevitably there will be design considerations to be addressed including the need for landscape mitigation but with respect to the scale/nature of the site, it is considered that an appropriate design solution, including landscape mitigation, can be delivered.

4.4 The development would contain a range of bespoke housing (largely bungalow style) with areas of open space for outdoor recreation. The development would be set around a village green (potentially with a bowling green and other outdoor facilities) and would expand over time in a phased manner (to be determined as more detailed proposals emerge).

4.5 It is difficult to make provision for this form of development within mainstream residential allocations or to provide a suitable long term environment for residents with available facilities/level of support due to relative land costs and additional costs associated with the form of properties and supporting infrastructure required. It is therefore essential that a bespoke allocation is made in a marketable area where required values can be achieved and maintained otherwise the potential investment from developers and individuals will not emerge and the need will go unmet for the foreseeable future.

4.6 Suitable controls on the operation of the village can be secured legally through the planning process and in the operation of the village by restrictions placed on residents (minimum age). Over the longer term, with the correct mix of properties and facilities, the Village will represent a sustainable facility providing both a valuable residential/social environment, and also providing for local employment opportunities in delivering care and other services to residents.

## **DOCUMENTS**

Document 1 – Site Location Plan

Document 2 – Housing an Ageing Population

Document 3 - East Lothian Council's Site Assessment (MIR Stage)

0

0



savills

# Spotlight Housing an Ageing Population

2015



# Overview

## THE CHALLENGES OF AN AGEING SOCIETY

Unlocking the equity built up by the over-65s and making more efficient use of housing stock are key opportunities

**T**he country is ageing and so the structure of the UK's population growth over the next 30 years looks set to be very different from that of the last 30. Recent population growth has been driven by the expansion of working-age people, contributing 72% of total growth.

Looking ahead, and although actual growth will be as a result of new births and younger migrants coming to the UK, the effects of the 20th-century baby boom mean that the biggest increase by age group will be among those aged 65 and over.

Our ageing society presents massive challenges for the wider economy. The dependency ratio (number of workers per children and retired people) will continue to decline unless retirement age is

pushed back further. This means a proportionately smaller number of tax contributors will be supporting more public-spending dependents. In a period when public services are already under pressure in the desire to reduce the deficit, they will come under further stress as they need to support and help more people.

### Under-occupiers

The UK is not alone in facing this challenge. Many developed countries are in a similar position, with Japan and Germany the most obvious examples. Other more recently developing countries are also rapidly facing the same challenge. For example, the World Bank estimates that China hit its peak workforce as a percentage of total population in 2010 and so faces its own issues in supporting an ageing society.

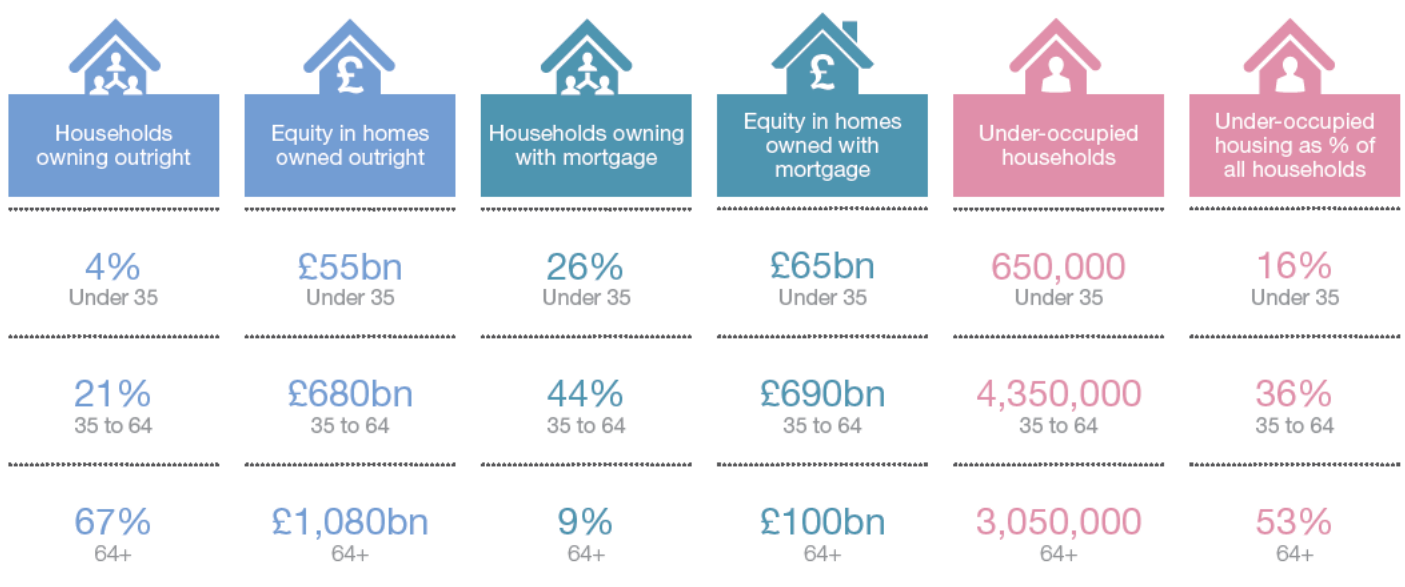
The effects from our ageing society are only just beginning to play out on the wider economy but the effects on the housing market are more apparent. Income-busting house price growth during the 1990s and 2000s followed by the lasting effects of the credit crunch since 2008 has left us with a market that is deeply unequal.

Many of those fortunate enough to have been born in earlier generations and own their own home have benefited from price growth and current low mortgage rates. Home ownership among the over-65s is 78% compared to 64% across all age groups. They will also typically own their home outright with no mortgage and are sitting on over £1 trillion worth of housing equity.

Older households also tend to have more housing space than they need on a day-to-day basis. The English Housing Survey indicates that around three million (53%) households aged 65 and over are under-occupying their home with more space than they normally need.

Meanwhile, current first-time buyers need deposits equal to 76% of their income (in London it is 126%) and so it is no surprise that many of the young people who do manage to buy do so with help from the bank of mum and dad, and increasingly grandma and grandpa.

FIGURE 1 Housing equity and under-occupation by age



Source: Savills Research

The challenge will be unlocking the equity and making more efficient use of the housing stock. Although older households are sitting on a large amount of wealth, without the ability to sell or borrow against it, housing equity becomes just a number on a piece of paper. With housing market transactions improving but still below pre credit-crunch levels and mortgage market lending still relatively tight for both older borrowers and first-timer buyers, opportunities to unlock this equity will remain constrained without further innovation.

### Changing attitudes

It would be politically, socially and ethically wrong to force people from their homes. However, the generation now approaching retirement will be more accustomed to moving up the housing ladder rather than living in just one family home. Attitudes are changing with surveys indicating there is a frustrated and growing desire to move in older age, albeit at lower rates than younger age groups.

Without homes that meet changing lifestyles needs or financial incentives, such as stamp duty holidays for downsizers, it appears likely that we will see the majority of people staying in the family home for as long as possible. Typically until faced with a pressing health or social reason (e.g. bereavement, safety or health scare).

The twin challenges of an ageing population and inequality present some significant headwinds for the country in the years ahead. The retirement housing sector should be well placed to turn these challenges into opportunities. We are now seeing increased activity in the sector with more participants and a wider range of products and locations.

However, we are yet to see a product that truly breaks down the British apathy towards retirement living and at a price that is accessible to the majority of the population. ■

“The retirement housing sector should be well placed to turn challenges into opportunities”

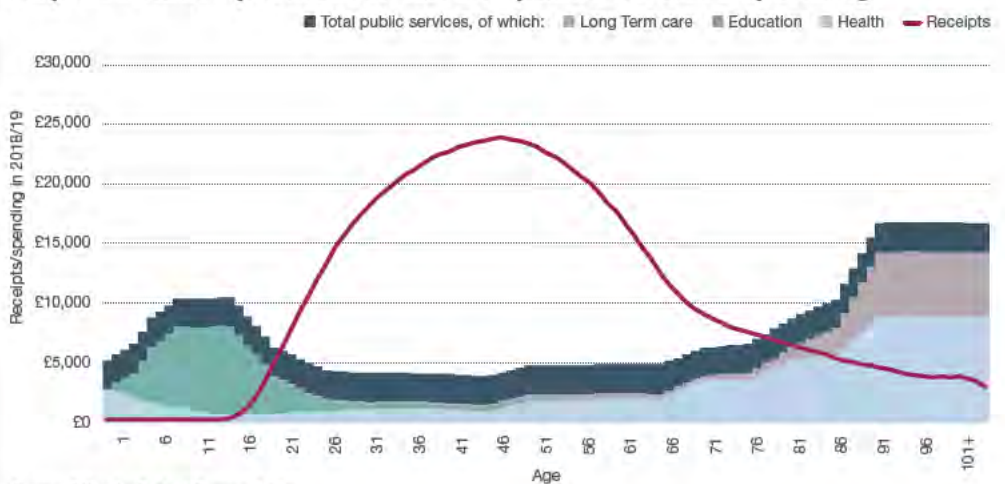
Savills Research

FIGURE 2  
Population growth by age



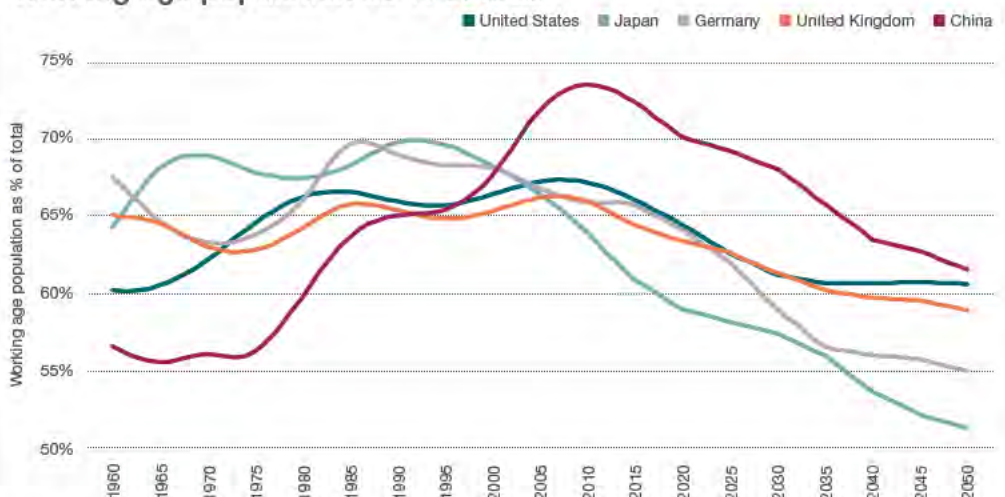
Source: ONS

FIGURE 3  
Representative profiles for tax and public services spending



Source: Office for Budget Responsibility

FIGURE 4  
Working age population as % of total



Source: World Bank



# Demographics

## THE DRIVERS OF DEMAND

A knowledge of demographic and market trends is key when identifying potential markets for development

**U**nderstanding where older people are currently living and may be living in the future is useful for assessing the potential demand for retirement housing. However, it can be misleading to simply rely on population projections. They are based on recent trends in births, deaths and migration.

Therefore, they can be heavily dependent on recent economic growth and new housing supply. Areas that are able to offer both jobs and new homes will likely see higher migration and hence population growth than those that fail on one or both counts.

It is important to discern the trends underlying projections when identifying potential markets for development. Are there increasing proportions of older people due to young people leaving in search of employment elsewhere? Are overall numbers increasing because there has been a large amount of housebuilding? Or is growth lower than it could be because the local market is failing to accommodate older people and so they are moving elsewhere?

Figure 5 below highlights some of these trends. Traditional retirement markets such as Eastbourne and Christchurch are towards the top-right of the chart with high proportions of and net inflows of older people.

Meanwhile, at the bottom-left of the chart are urban areas such as London and Manchester and some markets with low levels of housebuilding such as the Home Counties. These markets have a net outflow of older people along with lower overall proportions living there. However, it is worth noting that, despite having a much lower proportion of older people, Manchester (local authority) has double the number of people aged 65+ as Eastbourne.

Meanwhile, the markets with the highest projected growth in older people (dark red) are typically those that have seen lots of housebuilding such as Milton Keynes, Aylesbury Vale, and Swindon.

New housebuilding is below required levels across most of the country and particularly in the south of England. Therefore, any market with higher than average levels of housebuilding is likely to see increasing numbers of residents across all age groups over time. As the market for older persons' housing matures and becomes more competitive, it will be essential to understand the range of demographic and market trends driving demand in local markets. ■

FIGURE 5  
Over-65s existing housing demand model



Source: Savills Research

# THE DRIVERS OF NEED

## The key demographic trends in the retirement housing market

The charts opposite are based on 2011 Census data and show some of the key demographic trends that are driving demand in the retirement housing market.

The existing retirement market is heavily dependent on 'needs' based movers and the living arrangements of older age groups highlight this. The first chart shows the large proportion of older age groups that are widowed with a particular bias to women aged 75 and over given their longer life expectancy.

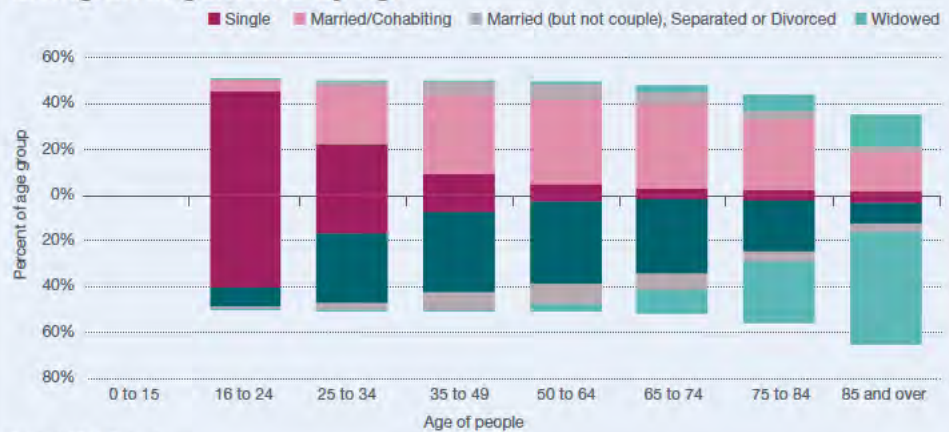
The health of people by age, along with their ability to do day-to-day activities, also highlights the difficulties faced by large proportions of people in older age. 19% of people aged 75 and over are in bad health and another 48% find their ability to perform daily activities limited.

As such it is not surprising to see the generation below those struggling with health are providing large amounts of unpaid care. Over two million (26%) people aged 50 to 64 provide unpaid care every week and large numbers are continuing to do so in retirement.

As life expectancy continues to rise (the average 65 year old can expect to live another 20 years), there will be growing pressure on those approaching or just entered retirement to meet the care needs of their parents.

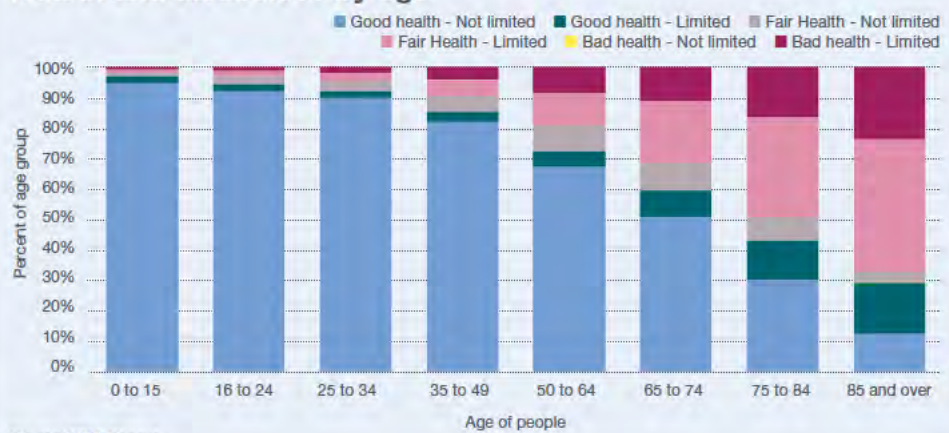
We expect to see growing numbers of this generation release the equity held in their homes as they are expected to meet the care needs of their parents and assist their children in getting on the property ladder alongside meeting their own pension requirements.

**FIGURE 6**  
**Living arrangements by age**



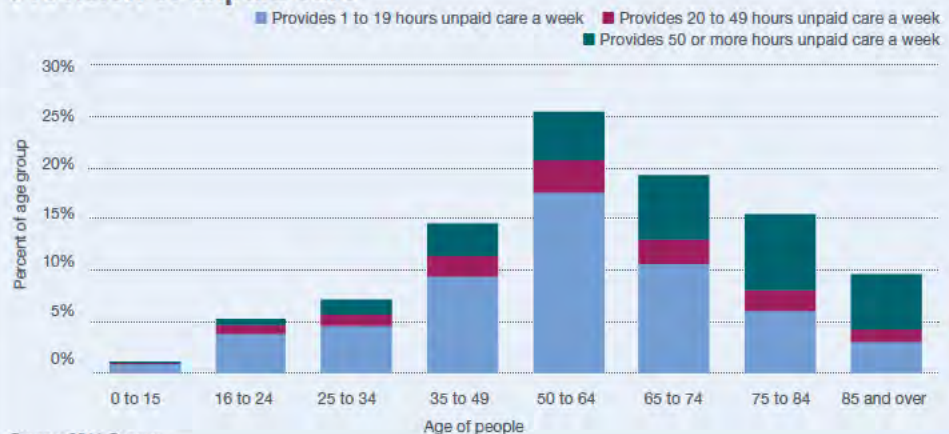
Source: 2011 Census

**FIGURE 7**  
**Health and disabilities by age**



Source: 2011 Census

**FIGURE 8**  
**Provision of unpaid care**



Source: 2011 Census

# Existing Market NEEDS VERSUS ASPIRATION

Analysis of existing provision of older persons' housing suggests there are opportunities in the retirement sector

**O**ne of the biggest issues with assessing the housing market for older people is the wide range of products and services on offer along with the number of different names for them.

Figure 11 sets out our model of the older persons' housing market based on the level of care required,

the affluence of the resident and the tenure of the housing. Overall, we estimate there are 480,000 nursing and care home beds, and 515,000 homes specifically for older people across England.

Around 80% of units in the nursing and care home sectors are owned and operated by the private sector, while only 25% of Extra Care and Retirement homes are privately owned.

In terms of overall provision, the nursing and care home sector equates to 5.0% of people aged 65 and over while the Extra Care sector houses 0.6% of older people and 4.8% of older people live in retirement housing. Retirement villages typically offer a combination of these products and are a subset of these numbers.

For comparison, a report by Housing LIN in 2011 indicated that 17% of over-60s in the United States and 13% in Australia and New Zealand live in dedicated retirement communities, although many of those homes will be simply age-restricted. Analysis by ARCO suggests the provision of Extra Care type housing in these countries is on average 5.3% of older people compared to only 0.6% in England.

Clearly there is a substantial opportunity for the sector to grow if it delivers products that meet lifestyle as well as needs. ■

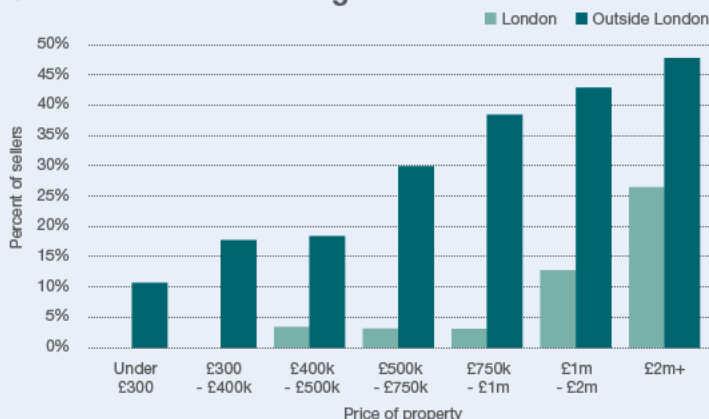
## ASPIRATIONAL DOWNSIZING

The emergence of premium developments

The retirement housing market has traditionally focused on 'needs' based demand. However, over the last few years we have begun to see the emergence of an aspirational downsizer market targeting wealthier purchasers. As the chart below shows, the economics and hence propensity to downsize increase along with housing wealth.

Some of the more traditional private sector retirement housing developers have recognised the potential of this market. In recent years we have seen the likes of Pegasus Life and McCarthy and Stone move away or at least expand from the mass-market sector and start to deliver premium developments targeting aspirational downsizers.

FIGURE 9  
% of sellers downsizing



Source: Savills Research

### ASPIRATIONAL DOWNSIZERS

#### LIMITED NUMBERS BUT GROWING

- Range of options for existing housing stock (bungalows), general market new build or premium retirement housing.
- Mid to late 60s, children left home, desire to unlock housing equity or move to smaller home. Need for larger than average rooms, plenty of storage space. No desire for safety features (alarm, etc) but future compatibility can be a plus.

### RETIREMENT HOUSING

#### 455,000 HOMES

- Self-contained units offering estate management, alarms
- Typically in their late 70s, likely to be recently widowed and so higher female-to-male ratio or onset of health issues
- Purchase driven by need rather than aspiration (e.g. bereavement, no longer able to manage/maintain large family home).

### EXTRA CARE HOUSING

#### 60,000 HOMES

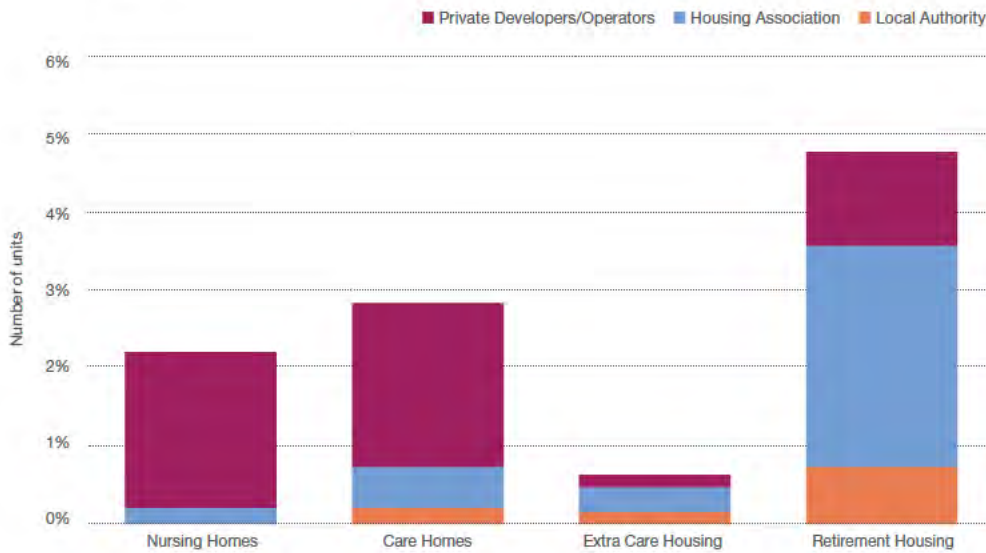
- As per retirement housing but with additional communal facilities (e.g. restaurant), 24-hour emergency staffing, additional care or domestic help available.
- Typically over 80 years old and in need of more care than offered in standard retirement housing.

### NURSING/CARE HOMES

#### 480,000 BEDS

- In need of full-time nursing or care.

FIGURE 10 Existing provision of older persons housing



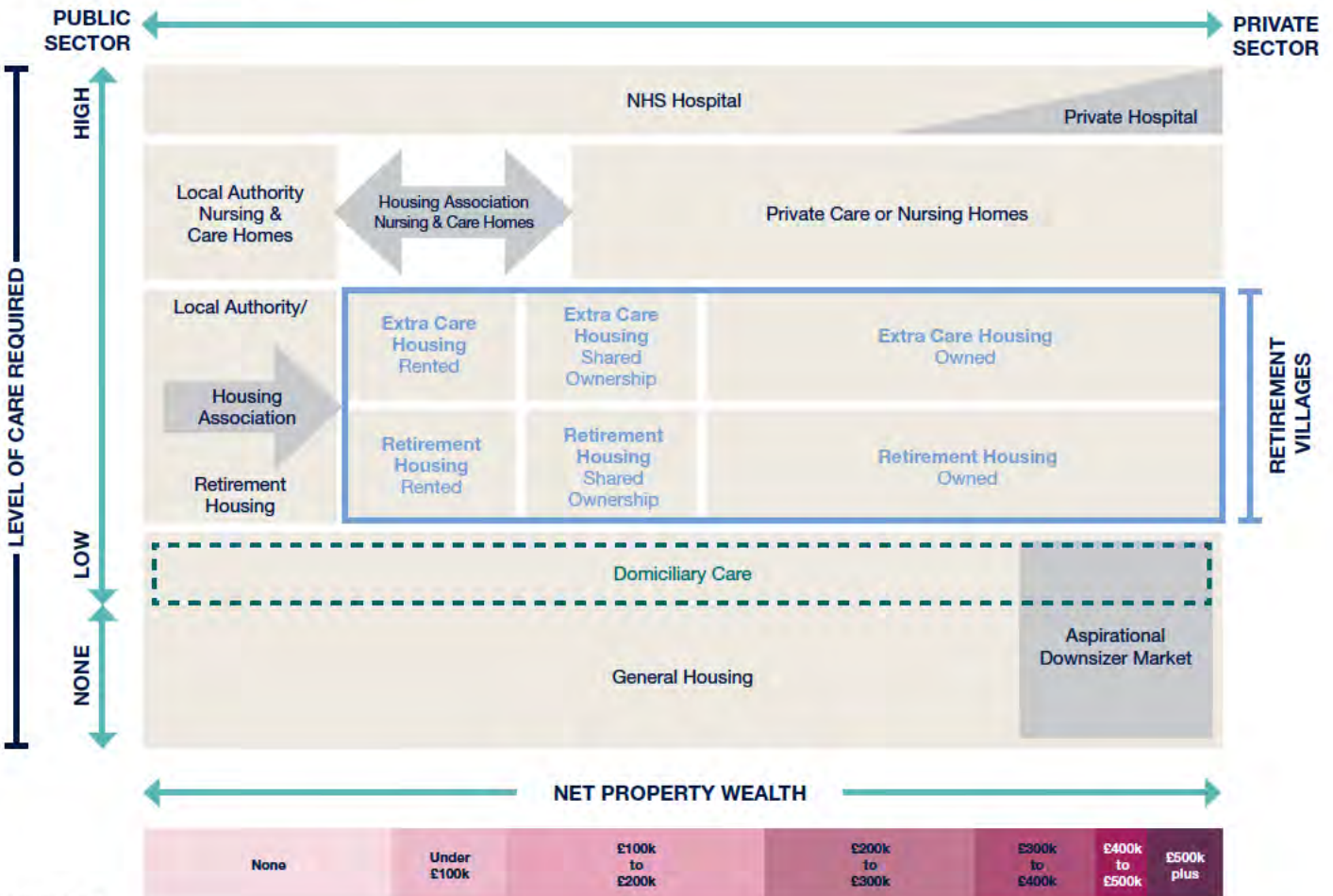
Source: Savills using EAC, LaingBuisson

**80%**  
of Nursing/Care privately owned

**25%**  
of Extra Care/Retirement privately owned

**17%**  
of over-60s in the US live in dedicated retirement communities

FIGURE 11 Housing for older people



Source: Savills

# Housebuilding

## SUPPLY & FUTURE NEED

What type of retirement housing is required for the nation's future housing needs?

**T**he supply of new homes for older people, specifically retirement and Extra Care, has averaged around 7,000 units per year over the last decade. This currently equates to a 1.4% increase in existing stock, around double the level being achieved by the general new build housing market. However, there is still room for improvement.

There are around 515,000 Retirement and ExtraCare units in England and a large proportion are local authority and registered provider stock. Around 385,000 units fall into this category and they play an important role in housing the most in need.

However, they also present a challenge given the large numbers that were built in the 1980s and early 1990s. Many were built with grant funding that encouraged volume rather than quality or space.

Although a large number are being refurbished every year, the constraints of the original stock,

in terms of size and capacity for upgrade, mean that many will deliver a less than optimal solution for the nation's future housing needs.

Private developers and operators form the other side of the market with around 130,000 units. These range from the converted country house market of the 1970s and 80s to the purpose-built market dominated by the likes of McCarthy and Stone (with around a 70% share of the for-sale market in 2014).

These homes offer a solution for people who don't qualify for social housing-based care with products that highlight the safety and security of retirement living to those in need.

### Growing in size

The typical new build development contains around 20-50 one or two-bed flats priced at a similar level to local area houses, although recent developments are growing in size. They tend to be located close to town centres and/or nearby bus stops and offer some communal space and visitor accommodation.

Their business model is based on maximising land use through minimal parking provision and high density combined with achieving premium prices on a per square foot basis. As well as high purchase costs there are also service charges that cover various outgoings, including building managers and emergency call monitoring.

Additional care options may be available but those in need of nursing care will typically have to move into a dedicated nursing home.

Given the costs and service offerings, this model caters well to those in need but does not provide an attractive proposition for aspirational downsizers. As such, sales rates can be slower than for traditional housebuilders and may require finished homes for their potential residents and families to assess and measure against their needs and furniture.

### Aspirational market

Many developers are now looking to expand into the aspirational market, with financial support from private equity. This means building attractive and appropriately sized homes that people with a lifetime of belongings can and want to move into.

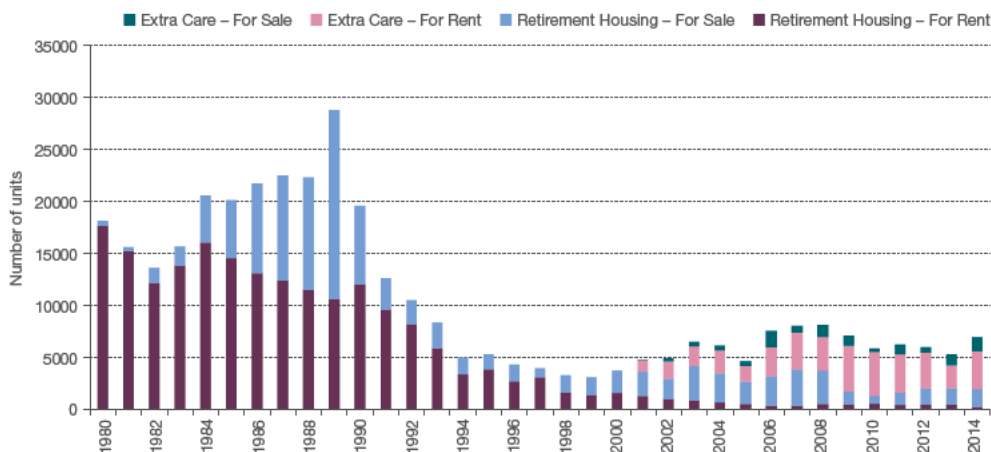
New build homes with kitchen-dining-living spaces that work for younger purchasers may not be attractive to older buyers downsizing from a house.

Many residents will be leading active social lives and so will need space for their car rather than just a bus route into town. The focus on safety and security in the current retirement housing sector can be off-putting to those at the younger end of the spectrum.

Instead it is important that housing is future-proofed; that is in terms of building homes that can adapt to future needs with wiring for alarm systems or space for stair lifts or downstairs showers, rather than trying to predict future technologies and whether we'll need space for 1960s-style robots.

Targeting the aspirational market offers rewards with some developers seeing increased buying off-plan, but it also comes with risks as competition for land increases with a reliance on achieving premium prices relative to the local market. This will help to increase the delivery of homes for older people. ■

FIGURE 12 Delivery of housing for older people



Source: EAC

# FORECAST OF FUTURE NEED

## What is the potential for future supply in the market?

With a large number of private developers looking to expand and housing associations looking at providing market rent or for-sale products, what is the potential for future supply in the market?

Our analysis of the future supply pipeline using data from Glenigan indicates there are schemes containing around 30,000 Extra Care and Retirement homes in the planning system or approved. One third of these homes are currently in the planning system, with the majority (90%) in the private sector. Among the 19,000 homes on schemes that have been approved, 12,000 homes have started on site with the majority (68%) being built by the private sector.

With recent delivery of housing for older people averaging around 7,000 homes per annum, this suggests the short-term

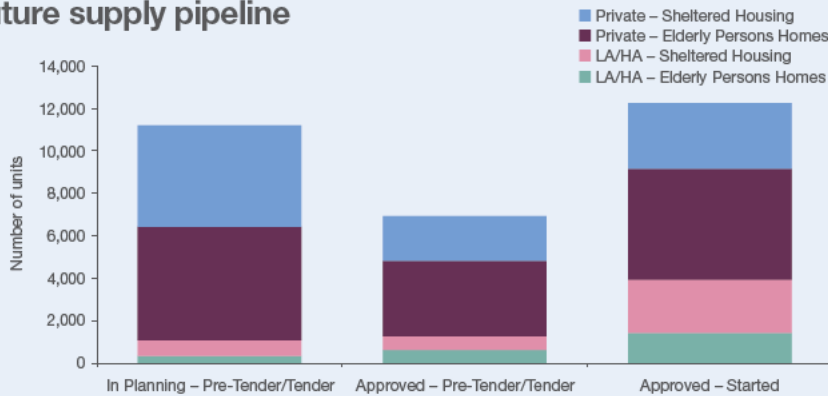
prospects for new supply are slightly above recent levels.

In terms of housing need, the projected 2% annual increase in the number of people aged 65 and over between 2015 and 2020 would require 11,000 homes per annum. This broadly matches our analysis of the current supply pipeline and suggests that supply may soon be at the lower levels needed to maintain existing provision per older person. However, the number of people aged 75 and over (which is probably a better benchmark for needs based housing) is projected to grow by 3.2% over the same period. Along with the need to replace ageing stock, this suggests a target of 18,000 homes per annum would be more appropriate to maintain existing provision.

Maintaining our existing provision of housing for older people is a minimum

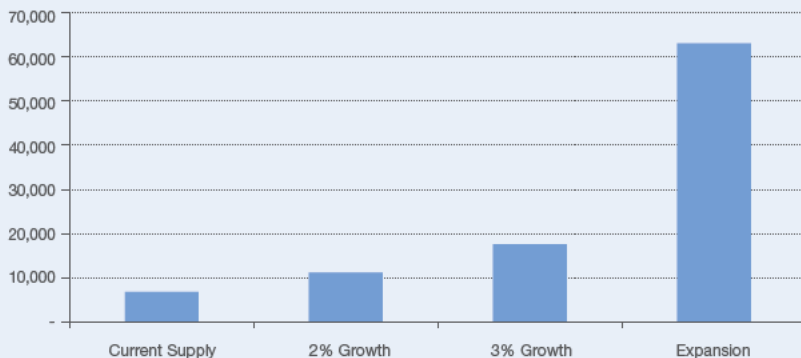
benchmark for how much new housing is required. As our analysis of international comparisons suggests, there is still substantial room for growth in the proportion of older people living in housing designed and built specifically for them. A relatively unambitious target of increasing the provision of Extra Care Housing from 0.6% of older people to 2% would require an additional 130,000 homes. This is still well below the 5.3% average across the US, Australia and New Zealand. Meanwhile, increasing the provision of Retirement Housing from 4.8% of older people to 10% would require an additional 500,000 new homes. Increasing the provision over a ten-year period would require an additional 60,000 new homes per year above the levels required to maintain existing provision. This could be a substantial opportunity, provided developers can solve the £250,000 challenge.

FIGURE 13  
Future supply pipeline



Source: Glenigan (excludes schemes under 10 units)

FIGURE 14  
Future housing requirement



Source: Savills Research

**27,000**  
Extra Care and Retirement units are in the planning system or approved

**18,000**  
homes needed per year to maintain provision

**32%**  
of approved units are being delivered by the public sector

# Downsizing THE £250,000 CHALLENGE

Incentives need to be offered to make the prospect of downsizing more attractive to existing home owners

**A**s discussed earlier, the current retirement housing market is generally split into two sub-sectors. There is the aspirational downsizer market offering a premium product for people pro-actively looking to move and there is the needs-based market where demand tends to be driven by people requiring greater levels of care, support and security. The biggest challenge and opportunity for the sector is therefore in filling the gap between these two sectors by delivering an aspirational product that encourages people to downsize, but at a price that works for someone living in an average priced home.

Unfortunately, the economics of downsizing from an average priced home are not attractive enough by the time stamp duty on the new property, moving costs and fees are accounted

for in all but the highest value markets. This is even before any allowance for the emotional strain of moving and the desire to release some additional cash from the process. Therefore, we need to look towards other tenures and financial models to unlock the market's potential.

A stamp duty exemption, for example, would be a very welcome move in making downsizing more attractive. Unfortunately, it appears unlikely to happen given the difficulties in ensuring the benefits are realised by the homebuyer and not by the developer through higher prices. It also causes some political difficulties in supporting a group of people widely seen as beneficiaries of the housing boom rather than those priced out, despite its potential to free up family homes for younger buyers.

Instead of simple solutions, it appears likely that we will be reliant on more complex arrangements and financial instruments. Equity release products such as home reversion

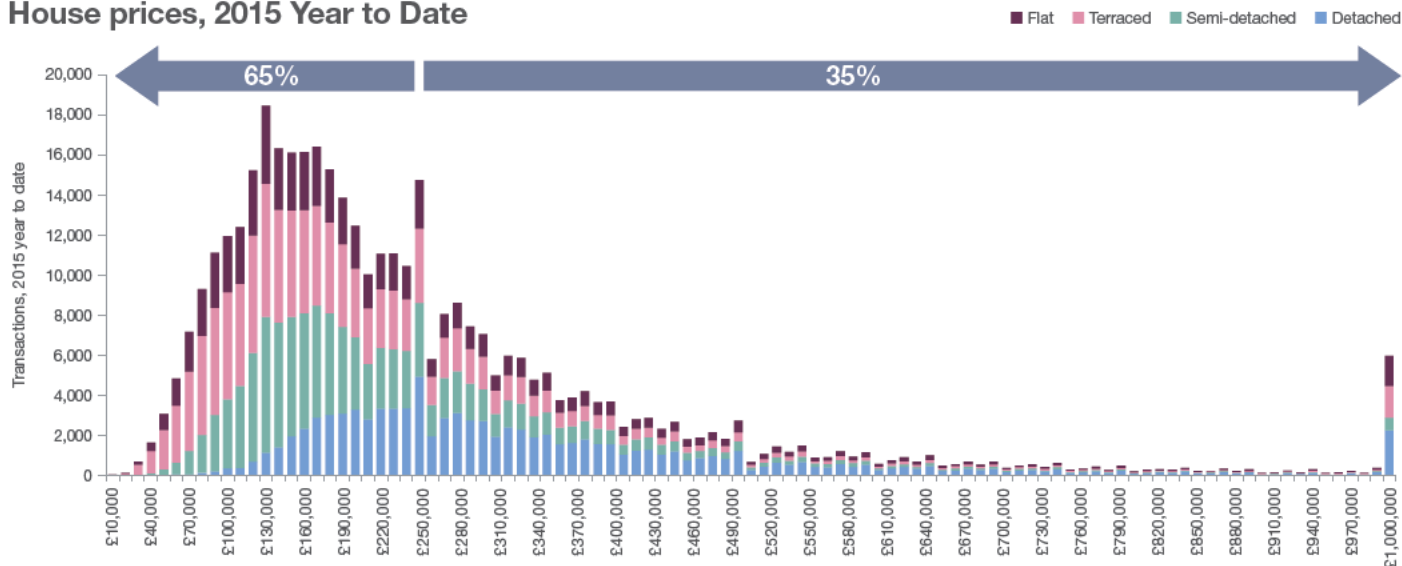
schemes and lifetime mortgages, shared ownership and long-term rentals are all likely to become more widely available in the sector. Much will depend on the result of the Law Commission's review into exit fees with a paper due this month. Many prospective buyers are asset rich but cash poor. In the event that it allows them, we will probably see more substantial investment into the sector and a big increase in housing/care products based on sharing the capital value uplift to offset ongoing service charges and care needs, as is common in New Zealand and Australia.

Creating financial incentives and the means for more people to move into older peoples' housing is important, but more essential is the need to create homes that people actually want to move into. Developers taking a general market approach to the sector may struggle. It will be essential to understand both the local market dynamics but also the housing needs and demands of the many sub-sectors of demand for older peoples' housing.

The challenges presented by our ageing population are many, but the opportunities they present for the elderly housing sector are just as widespread. There are already many active participants in this sector but to fully realise the potential there needs to be support from all levels of Government and continued innovation by developers, operators and lenders that results in products that are both attractive and affordable to older people. ■

FIGURE 15

## House prices, 2015 Year to Date



Source: HM Land Registry

## A CLASS OF ITS OWN

Is the planning system doing enough to help development of retirement housing?

Government policy is explicit in its requirement for Local Authorities to meet the housing and care needs of older people. Many have already published plans on how they will do so but many more need to. In light of the Government's policy ambition, it is worth considering whether the planning system is doing enough to promote and develop the number and range of homes needed for the growing elderly population.

The wide range of housing on offer means that new development in the sector can fall into several use classes within the English planning system. For example, Retirement Housing with minimal care is usually considered C3 along with most residential development, while Nursing Homes will be considered C2 along

with other institutions such as hospitals. Therefore, most older people's housing is not differentiated from standard residential developments.

This is a particular issue with regards to the Community Infrastructure Levy (CIL). Local Authorities' CIL charging schedules generally refer to "residential uses". This combines older people's housing with standard residential and sets a cost per square metre linked charge for all new development in that category. This rate should meet the viability test for standard residential sites but that can vary greatly from the viability of housing specifically for older people. This potentially undermines the delivery of older people's housing and the aims of the Government.

Retirement and older people's housing has very different densities, build costs, sales rates and requirements for communal and staff areas than typical residential development. As such, any CIL charging schedule should properly assess the viability of specialist housing independently from standard residential.

While some Local Authorities such as Central Bedfordshire, Waltham Forest and Dacorum, have excluded Extra Care or Retirement housing from their CIL charging schedules, many more should consider excluding elderly persons housing from CIL where viability dictates. Doing so is imperative to meeting the housing and care needs of an ageing population.



## BUNGALOWS IN THE SKY

A new approach to building retirement housing

Accounting for 9% of England's housing stock, bungalows are the go-to answer for today's politician when questioned on what to do for older home-movers. Their answer is typically accompanied by an anecdote involving an elderly relative.

It is true that bungalows offer single-floor living with plenty of storage space and access to outside space but arguments in

favour of them tend to miss some simple but important points. They are grossly inefficient in terms of land use and the values they achieve reflect the underlying development value of the land rather than the bungalow. Therefore it is unlikely that people would pay the same price for a new build bungalow where there is no prospect of development.

So rather than building traditional

bungalows, we can learn important lessons from them. The importance of space, storage, and access to outside space all emerge from their popularity.

One solution is to effectively build 'bungalows' stacked on top of each other. In other words, new build flats with all the attractions of a bungalow but without the stress of an overly large garden.



## OUTLOOK

### Turning challenges into opportunities

■ Our ageing society presents massive challenges for the country in years ahead but the retirement housing sector should be well placed to turn these into opportunities. Older people are sitting on over £1trn of housing equity and over half are living in homes larger than they necessarily require. However, unlocking this equity and these homes will depend on our ability to build homes that older people want and can afford to move into.

■ The existing market has been heavily focused on 'needs' based movers with bereavements, health or safety issues driving demand. In recent years we have seen increasing activity from private equity backed developers targeting the aspirational market. This has enabled some developers to achieve premiums above the local market and faster sales rates (including more off-plan). The

demand for these aspirational products looks set to continue growing.

■ We forecast the market needs to build around 11,000-18,000 retirement homes per year just to maintain existing provision rates amongst older people. Analysis of the current supply pipeline suggests that delivery looks set to be at the lower end of that range which is an improvement on recent levels (7,000 per year). However, evidence from the US, Australia and New Zealand suggest that there is substantial room for growth in the provision of older people's housing. Increasing the provision of housing to those levels would require an additional 60,000 homes per year.

■ The ability to increase delivery to these higher levels will require substantial innovation across the sector. Developers and operators need to offer products

and services that encourage older people to move. But they also need to deliver homes across a spectrum of prices and affordability. Creating a product that works for someone currently living in the average priced home (the £250,000 challenge) will be essential to its expansion. However, this will involve further financial innovation across a range of tenures and the result of the Law Commission's review into exit fees will play a large role in deciding the future shape of the sector.

■ Meanwhile, local authorities will come under renewed pressure to house those most in need at a time of further public sector spending cuts and increases to the minimum wage. Some are already looking to use their existing land holdings and partner with housing associations or private companies in order to meet their obligations.

## Please contact us for further information

### Savills Retirement Living



**Neal Hudson**  
Research  
020 7409 8865  
nhudson@savills.com



**Henry Lumby**  
Retirement Living  
020 7016 3808  
hlumby@savills.com



**Richard Rees**  
Development  
020 7016 3726  
rrees@savills.com



**George Cardale**  
Residential Development  
01179 100351  
gcardale@savills.com



**Craig Woollam**  
Healthcare  
020 7409 9966  
cwoollam@savills.com



**Ingrid Reynolds**  
Housing  
020 7016 3828  
ireynolds@savills.com



**Stuart Garnett**  
Planning  
023 8071 3923  
sgarnett@savills.com



**Louise Harder**  
Part Exchange  
01722 426835  
lharder@savills.com



**Ian Camplin**  
Residential  
01932 586200  
icamplin@savills.com



**Samantha Rowland**  
Valuation  
020 7409 9962  
srowland@savills.com

#### Savills plc

Savills is a leading global real estate service provider listed on the London Stock Exchange. The company established in 1855, has a rich heritage with unrivalled growth. It is a company that leads rather than follows, and now has over 600 offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

This report is for general informative purposes only. It may not be published, reproduced or quoted in part or in whole, nor may it be used as a basis for any contract, prospectus, agreement or other document without prior consent. Whilst every effort has been made to ensure its accuracy, Savills accepts no liability whatsoever for any direct or consequential loss arising from its use. The content is strictly copyright and reproduction of the whole or part of it in any form is prohibited without written permission from Savills Research.

**SITE INFORMATION**

Topic	Comments
Site Name	Site at Monkrigg Road
Site Ref	PM/HN/HSG065
Source of Site Suggestion	Agent (TMS Planning and Development Services Ltd) on behalf of Roy Mitchell Design Limited.
Site Size (ha)	10ha
Current Use	Agricultural
Proposed Use	Housing (retirement village)
Summary Description and Planning History	A greenfield site in agricultural use on the south eastern edge of Haddington.



0 50 100 150 200 metres

Reproduced by permission of Ordnance Survey on behalf of HMSO. (C) Crown Copyright and database right 2011. All rights reserved. Ordnance Survey license number 100023381



0 50 100 150 200 metres

Reproduced by permission of Ordnance Survey on behalf of HMSO. (C) Crown Copyright and database right 2011. All rights reserved. Ordnance Survey license number 100023381.

<b>SUITABILITY AND DELIVERABILITY OF SITE</b>		
<b>Topic</b>	<b>Assessment</b>	<b>Score</b>
Location	The site is outwith the current settlement boundary of Haddington but is well related to the town, being adjacent to existing residential development.	Yellow
Accessibility	The site is within 400m of a bus stop but the service is limited (Haddington-Tranent circular, 2 hour interval). The site is not within 800m of a railway station. It is within walking distance (1600m) of a range of local facilities including a school, shops and a sports centre in Haddington town centre.	Yellow
Exposure	The site has some shelter from northerly winds due to existing built development to the north.	Yellow
Aspect	The northern part of the site is north east facing whilst the southern half is generally south east facing.	Yellow
Suitability for Proposed Use	The site is generally suitable for the proposed use and would not give rise to conflict with adjoining land uses which include agricultural land and housing.	Green
Fit with strategic policy objectives and direction	The site is adjacent to a main settlement within the East Lothian SDA as identified within SESplan. Its development would therefore align well with strategic policy objectives of steering new development towards the most sustainable locations within the city region. For assessment against other more detailed policy objectives see 'Potential Impacts of Development: SEA'.	Green
Physical infrastructure capacity	The site is served by Castle Moffat Water Treatment Works which has available capacity and Haddington Waste Water Treatment Works which has very limited capacity. Vehicular access could be provided from Monkmain Road/Seggarsdean Crescent. A footway would be required along the northern boundary. Vehicle access	Yellow

	could potentially be taken from the C65 road and to facilitate this, local improvements would be required including extended street lighting, road widening, a footway on the eastern side and an extension to the 30mph speed limit.	
Service infrastructure capacity	If the site is progressed as a retirement village it will not have implications for education capacity. However should general needs housing should be proposed at a later date the implications for school capacity would need to be assessed. The site is within the catchment of Haddington Infant and King's Meadow Primary School which has very limited capacity but very limited expansion may be possible on site. At secondary level the site would be served by Knox Academy which has no capacity but may be able to expand.	
Deliverability/ Effectiveness	There are no known constraints at this stage that would prevent the delivery of the site in the LDP period. However it has not yet been established whether there is sufficient infrastructure capacity to serve the development and what the timescales would be for achieving this.	



POTENTIAL IMPACTS OF DEVELOPMENT: SEA		
Topic	Comments	Score
Biodiversity, Flora and Fauna	The site is not within any areas designated for their international, national or local nature conservation importance. There are no priority habitats within the site and no notable species have been recorded within 100m of the site. There are no protected trees or woodland within the site. The site submission suggests that the proposal would involve woodland planting around the perimeter and the provision of allotments.	o/+
Population	The site submission suggests there is an unmet need for housing for the growing elderly population and the proposal would help meet	+

	this specific housing need. The site has good access to the town centre and community facilities.	
Human Health	The site is not known to be contaminated. It has good access to the core path network and recreation facilities.	+
Soil	The development of the site would result in some loss of class 2 (majority) and class 3.1 (minority) prime agricultural land. There are no rare or carbon rich soils on this site.	-
Water	The site is not shown to be at risk of flooding on SEPA's flood map, with the exception of a very small area in the north eastern corner which is shown to be at risk of surface water flooding. The site does lie within Potentially Vulnerable Area 10/24. A small watercourse runs through the site and SEPA has advised that a Flood Risk Assessment would be required to assess the flood risk from this. A 6m buffer strip would be required to protect its ecological status.	?
Air	The site is unconstrained by existing sources of air pollution. The site has good active travel accessibility to Haddington town centre which would minimise the need for travel by private car to access local facilities and services. However at a regional scale Haddington's public transport accessibility is relatively poor and development in the town is likely to lead to an increase in private car travel to access regional level services therefore lead to an increase in emissions.	o
Climatic Factors	Haddington is in a reasonably accessible location in regional terms although is further from major centres of employment than many other East Lothian settlements, and therefore development of this site would be focusing development towards the more accessible and sustainable locations. The site is well positioned to access public transport, active travel routes, as well as local facilities and services. Realistically, development on the site would lead to some increase in car-based journeys and resultant greenhouse gas emissions. As part of the site is generally south-east facing it does partially lends itself to development that would be energy efficient i.e. solar gain.	-
Material Assets	The site is greenfield land therefore its development would not be making the most efficient use of land resources.	-
Cultural Heritage	The site is not within a Conservation Area. There are no listed buildings or scheduled ancient monuments within or adjacent to the site. There is moderate potential for unknown archaeological remains.	o/?
Landscape	The site is within the Haddington Plain landscape character area as identified in the Lothians Landscape Character Assessment (1998). The site is a gently sloping arable field with existing housing to the north. Mature hedges form the western, eastern, and southern boundaries. The northern boundary is the highest point of the site and from here there are extensive views to the south, west and east taking in views of Traprain Law, the Lammermuir Hills and Lennoxlove policy woodlands. The site sits within an area of open rural countryside which forms the landscape setting for Haddington on the approach from the South. Development on the site would result in the built up extent of Haddington expanding into this setting and encroaching into the countryside. These impacts may be able to be mitigated to an extent dependent upon an effective landscaping scheme.	-/?