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

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Additional information:

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

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

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Proposed East Lothian Local Development Plan Schedule 4 Representation Responses

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

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

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

For further information or advice, please contact:

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



Dunbar Community Council

Chairman:

Policy and Projects

East Lothian Council

Brewery Park

Haddington

Dunbar Community Council Comments on the Local Development Plan and the SES Plan

The implications of the Local Development Plan and the SES plan have been fully considered by the Dunbar Community Council. This letter includes our response to the proposed changes.

Our main concerns centre around how the infrastructure of the town will cope with these changes, and how essential services can be upgraded effectively and in time. The plan calls for over 1200 additional homes in the Dunbar cluster. This will increase the population of the town by as much as 4,000. The implications for local infrastructure and services will be immense.

Communications across the railway line: For some time now, Dunbar has been a town of two halves, bisected by the railway line, and with few viable road and pedestrian links between the two. This situation will be made considerably worse as the new developments take shape, unless some radical solutions are found. Most of the new development takes place in the South West of the town. The only effective vehicular routes to the old town North of the railway line will be along Brodie Road, Spott Road, and Queens Road; a route that is already heavily congested. The options must therefore include;

1. The re-opening of an existing underpass at Elm Street. I know that this has been rejected in the past by Network Rail, however, we believe that this option must now be re-examined. Even if the underpass can not be fully cleared to allow vehicular traffic, it should be perfectly possible to create a smaller space for

the safe passage of pedestrians and cycles.

2. Widening of the single track road South of Beveridge Row, and extension of the road North of the railway bridge around the East end of Belhaven Hospital to connect with Pine Street.
3. Widening of Eweford Road through to School Brae and the A1087.
4. A new foot and cycle path will be required through the Spott Road employment site in association with development at Newtonlees.

Additional Education Capacity: Developers are asked to pay for school classrooms but they do not cover the ongoing costs of teachers. Extension of the Grammar School will lead to loss of playing field space at the Grammar School. Pupils, and will need to use Halhill or Winterfield for Sport. We understand that there are good plans for the extension of our primary and secondary schools and a line of sight as to where the money is coming from for such developments. We would however like to have greater clarity on how this is to be achieved.

Water and Waste: The Beltonford sewage treatment works is nearly at capacity and has a history of problems. There is winter flooding at Halhill during heavy rain when the drainage from the new housing has not coped. The implications of the allocated sites on this area could be accommodated by Scottish Water, which has initiated a growth project, but enhancements will be required to strategic waste water assets to bring forward any additional development in the area. Any ground conditions constraints will need to be addressed and mitigation provided.

Health Services: Health Services in Dunbar are already under pressure. The Health Centre has some consulting space upstairs, however, it is difficult to recruit new GPs. Places like Bonnyrigg and Musselburgh with housing expansion have seen GPs closing lists and people having to arrange appointments around 3-4 weeks in advance. As yet, developers do not contribute to health services.

An Ageing Population: Dunbar has an ageing population and is a favoured location for retirees. There needs to be some ongoing provision within the community for end of life care. In addition, there is an increasing need for sheltered housing, nursery home provision, and suitable accommodation on a single level for elderly people.

Affordable Housing: The current trend is to include affordable housing within an existing development to create a social mix. In practice, this does not always work, and can give rise to “ghettos” of social housing surrounded by more affluent properties. We believe a more imaginative approach is called for. Very often, the candidates for social housing are single parent families on low income who do not even own a car. For them to be isolated in the middle of a development on the edge of the town does not serve their needs well. Instead, the brown field sites within the old town, of which there are many, could be developed to meet such needs. Here, all local facilities are easily accessible on foot or by public transport, and in many cases, off road car parking is non-essential and need not be a constraint. Developers could, where appropriate be released from the requirement to include social housing within their development, on condition that they contribute to the development of more central brown field sites.

Newtonlees Development: We note that the Newtonlees development is as shown in the Local Plan and is not

extended further towards Broxburn. We also note that the proposed L shaped extension to the Deer Park Cemetery is retained.

Development of the Dunbar Golf Course Site: We note that the proposed development of the Dunbar Golf Course site no longer figures in the local plan, and we understand that the previous outline planning permission has now lapsed. Some consideration should be given to the possibility that this plan may be resurrected in the future.

Transport Links: We fully support the proposed “Rages” improvements to rail services, platform extensions, the re-opening of East Linton Station, and easier access to bus services. There is a need for a large increase in car parking provision at Dunbar Station. All such improvements will be essential to get more commuters into Edinburgh.

Stephen Bunyan
Chairman

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

Dear Mr McFarlane

I am objecting to the following parts of the Proposed East Lothian Local Development Plan.

- PROP MH12
- PROP MH13

Q12a PROP MH12: Barbachlaw, Wallyford - Modifications(s) Sought:

Include a reference to the site being de-allocated for housing should the stadium prove not to be financially viable, and that a stadium is the only acceptable use for the part of the site currently identified for it.

Q12b PROP MH12: Barbachlaw, Wallyford - Justification for Modification(s):

A clearer statement of the Council's position in terms of alternatives to the stadium is required. Given the difficulty there has been in securing the development of the stadium to date, it is entirely possible that the landowner will in time push for housing across the whole site. Future possible scenarios like this need to be dealt with.

Q13a PROP MH13: Land at Howe Mire, Wallyford - Modifications(s) Sought:

Removal of this site from the development plan.

Q13b: Land at Howe Mire, Wallyford - Justification for Modification(s):

The proposed use of a small parcel of land currently designated as green belt for the stadium car park does not justify the release of a much larger area for mixed use development. The decision on the car park was part of an appeal decision, and it is still questionable whether the stadium will ever be completed, even taking into account the legal agreement requirement linked to the associated housing.

The field now allocated as MH13 is an integral part of the settlement separation between Inveresk/Musselburgh and Wallyford. It is visually prominent from the A1 and surrounding area and forms an important part of the setting of Wallyford and Inveresk. This will become even more important as Wallyford expands (MH9).

Given the scale of development occurring in Wallyford through MH9 and MH10, there is no justification in terms of housing numbers for the need to release such a significant green belt site in terms of visual impact and settlement separation just for 170 homes. These additional units could easily be accommodated in MH9 & MH10 through careful planning and design.

Yours sincerely

Name: Mrs Nicola Dick

From: [Zochowski, Paul](#) on behalf of [Policy & Projects](#)
To: [Local Development Plan](#)
Subject: FW: Park view pencaitland development- prop tt14 (
Date: 03 November 2016 11:11:50

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

From: Antoniak, Jan On Behalf Of Building Standards
Sent: 27 October 2016 08:43
To: Policy & Projects
Subject: FW: Park view pencaitland development- prop tt14 (

Jan Antoniak
Senior Support Services Asst
Building Standards
John Muir House
Haddington
01620 827284

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

From: Ward, Karen On Behalf Of Customer Services
Sent: 27 October 2016 01:18
To: Building Standards
Subject: FW: Park view pencaitland development- prop tt14 (

Good morning

Can you please assist with this enquiry?

Thanks
Karen Customer Services

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

From: Paul Jaworski []
Sent: 26 October 2016 19:58
To: Customer Services
Subject: Park view pencaitland development- prop tt14 (

Dear sir/madam,

I have the following objections to make regarding the proposed development at park view pencaitland (prop tt14) I believe 55 homes would be overdevelopment of the site as it would be out of scale with existing housing in the conservation area.

It would damage and be incongruous with the surrounding historic designed landscape.

If the housing backs directly on to my property it would compromise my privacy and could also be increased noise from children, pets, vehicles and d.i.y.

I also have a number of concerns regarding access to the site via the lane between 6&7 park view pencaitland. This lane is also used for vehicle access by b.t telephone exchange and 6,7,8&9 park view. Vehicle access to the rear of my property is at the end of the lane next to the field (proposed site) entrance and to the left. Over the last 18 months there has been a problem with flooding from the field onto the lane resulting in water constantly running onto the lane. Also much mud at the field entrance which is carried onto the lane by any vehicle coming onto it from the field. This makes the lane very slippery and dangerous for vehicles and pedestrians. The mud also can be carried onto the main road (a6093) . Children and elderly regularly use this lane

There is also poor visibility at the lanes junction with the A6093 and it would be dangerous if large vehicles wore using this lane for other road users and pedestrians.

It should be remembered that a previous planning application to build two houses next to the lane was refused on the grounds that it would be unsafe for more vehicles to be using the lane because

of the poor visibility at the junction. It would be unsafe for any more vehicles to be using the lane during the preposition and building process and especially after the houses are built. East Lothian council would be guilty of double standards if they allow this to happen and should be held accountable if they do. I am also concerned that if the new housing development has pedestrian access on the lane it could result in loss of privacy to my property and would also be unsafe for pedestrians as there is insufficient space to construct a footpath.

Yours sincerely,
Mr. Paul jaworski.

P.s. I am resenting as it has been returned when sent to mdp@eastlothian.gov.uk please can you forward this to planning/environment. Many thanks.

Response ID ANON-ZMS3-3MZ3-T

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-03 08:40:59**

About You**1 What is your name?**

First name:

John

Surname:

Wright

2 What is your email address?

Email address:

3 Postal Address

Address:

Strutt & Parker,
5 St John Street,
Perth,

4 Please enter your postcode

Postcode:

PH1 5SP

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

Developer/ agent/ landowner

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

Organisation:

Strutt & Parker

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::

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

Justification for Modification(s):

Section 2 - A Spatial Strategy for East Lothian (pages 11-14)

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

Modifications(s) sought:

Introduce a new Para following Para 2.9, before Para 2.10, (on Page 12) with subsequent renumbering, as follows;

"Drem is also a sustainable location for medium to long term future growth to be facilitated in a plan led manner for a sensitive large scale landscaped mixed use development opportunity centred around the railway station and village core for approximately 2,000 homes, a site for a Primary School, local road improvements, drainage improvements, expanded railway station car parking, playing fields, open space, core path improvements and a new village centre on 150ha of land. There are a number of wider items identified in the LDP (east coast main line improvements to Edinburgh for example) which can be facilitated (in part) by development at Drem and other developments elsewhere in the locality. This plan safeguards a potential Drem Expansion Area to enable the necessary investigations to be undertaken and solutions explored with service and infrastructure providers to resolve known issues and allow advance planting to take place prior to development commencing. A solution will need to be found to the identified issues to convert the safeguarding to an allocation through a review of the LDP".

Identify Drem as a settlement in a similar manner to Athelstanford on the Main Strategy Diagram (on Page 14) and identify a safeguarding in a similar manner to Blindwells safeguard.

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

Justification for Modification(s):

Drem is a similar sized settlement to Athelstanford, with a railway station, and in a location where other improvements are identified elsewhere in the LDP which can be facilitated (in part) by development at Drem, and elsewhere. This should be shown on the Main Strategy Diagram because the safeguarding sought can contribute to delivering the strategy identified.

At Para 1.5 there are references to the Proposals Maps identifying areas "where land is safeguarded so as not to prejudice a certain type of development occurring" or to "ensure an area can be considered as a potential future development location".

However, from our review of the Plan we can only see one safeguard (at Blindwells), but there are references in the Plan to other potential locations which have not been safeguarded (such as at Drem at Para 2.154) and we believe they should (particularly given the comments, at Para 1.15 and at Para 2.7, that "settlements further east are also near the limit of what can be achieved in the way of expansion without significantly changing their character").

We believe that the future potential for development at Drem is acknowledged by the Council in not identifying a Countryside Around Towns designation at this location as they have done elsewhere at more developed settlements in this plan.

The identification of a safeguarded area (as shown on our "Vision for Drem" document submitted with these representations) would give the owners of the land, developers, and infrastructure providers the confidence to invest significant sums in the necessary investigations and surveys that would be required to fully demonstrate the effectiveness, deliverability, and delivery of necessary infrastructure, at the time that they are required, to avoid the sometimes significant lead in times associated with these types of large scale developments (as referenced at Para 2.11). The Plan should safeguard the potential for development at Drem in a similar manner to, and consistent with, the approach taken at Blindwells, for the same reasons.

At Para 1.29 the Plan refers to the west of East Lothian being the most accessible part, however it is not as though the east of East Lothian is completely inaccessible and Drem, for example, benefits from a frequent am and pm peak service (as referenced in our "Vision for Drem" document), and a bus service which could be enhanced as part of an expansion of Drem, which is something that should be capitalised on in the future planning of East Lothian focussing on existing sustainable transport options, particularly given the statements about the capacity of other settlements in the area to accommodate further development.

This potential, and future need, also seems to be acknowledged in the emerging SESplan (Proposed Plan Para 3.13) where it states "Any further development requirements for East Lothian will be dispersed to locations further east along the Long Term Growth Corridors. Subject to future growth requirements for East Lothian, there may be a need for a second new settlement in the east of East Lothian". Drem lies within the East Coast SDA which, as confirmed by the Council in the Proposed Plan (at Para 1.49), "follows the key transport corridor of the A1 and East Coast railway line from Musselburgh to Dunbar" and we believe is what is being reference as a potential location to meet future needs. Given the lead in times to delivering the Blindwells new settlement, we believe a safeguarding is required to preserve this potential and allow the necessary work to be undertaken to bring forward the development at the appropriate time.

Para 1.30 of the Plan identifies the existing deficiencies (many of which have been caused by the cumulative impact of population growth Para 1.33) in the rail network, station car parking, and introduces the possibility of a four track section of rail out to Drem and whilst we acknowledged these issues and the need to resolve them, we find it strange that of the six identified settlements with rail stations Drem is the only location (which also lies within the East Coast SDA) with no development identified in the short, medium or longer term.

At Para 1.49 the Plan states that "The SDP is clear that land allocations made by previous plans are to be carried forward and must be complemented and not undermined by land allocations made by LDPs". It should be borne in mind that this support for the continuation of existing sites is not replicated in the emerging version of SESplan (Proposed Plan Para 5.10) which clearly states that "SESplan member authorities will also consider deallocating sites carried over from multiple plan cycles where action taken has proved ineffective in making them deliverable...". Therefore, whilst the Council may believe at present that there is a sufficient supply of land identified, it is possible that through future reviews of the Plan and the land allocations, that this situation will change (including at Blindwells), reinforcing the rationale in safeguarding further medium to long term growth areas to supplement the supply and to provide for the future.

Development at Drem, within the East Coast Strategic Development Area, over the medium to long term meets many of the Aims, Objectives and Outcomes of the Plan (set out at Para 1.61), particularly those relating to sustainability, and helps achieve the Councils aspiration (at Para 1.41 that "future development of the area occurs in a sustainable way") as well as providing opportunities to meet future need and demand.

Whilst we acknowledge the spatial strategy of this Plan is a compact one, the spatial strategy of future plans is likely to be more dispersed given the significant development identified in the west of the area (as referenced in emerging SESplan Proposed Plan), and the limited capacity of most settlements in the east of the area to accommodate further development. The current strategy, and any alternative strategy in the future, will necessitate the loss of Grade 1 Agricultural Land. The land at Drem is identified as being Grade 1, 2 and 3.1 by the Scottish Governments Land Capability for Agriculture Mapping, with the lower quality land lying to the south of the railway.

Development at Drem is not considered to be any more complex than that being considered at Blindwells and should be identified in a similar manner as alluded

to in other parts of the plan for the same reasons.

Regard has been had in preparing the enclosed "Vision for Drem" document to the special qualities of the adjacent Special Landscape Area; the Conservation Area; the identified built heritage in the locality; the potential to contribute to the green network and has arrived at a proposal which we believe identifies a logical safeguarding area balanced around the train station with logical pockets of development which respect (and enhance through detailed design) the setting of Drem, and other important features. We believe this shows that it is possible to maintain and reinforce the special character of the area, deliver walkable neighbourhoods, whilst rectifying known constraints. Further detailed technical assessment will be required. We have also submitted with the "Vision for Drem" document an Ecological Walkover Survey, and a Drainage Strategy which have been taken in to account in preparing the vision, and have not identified any significant impediments to development as shown on the Vision document from proceeding.

Section 2d - Tranent Cluster Main Development Proposals

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

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

Justification for Modification(s):

Section 2g - North Berwick Cluster Strategy Map (pg 51)

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

Modifications(s) Sought:

Identify Drem as a development safeguard area (as shown on our "Vision for Drem" document submitted with our representations) on the Spatial Strategy for the North Berwick Cluster Map (on Page 51) in a similar manner to Blindwells.

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

Justification for Modification(s):

Drem is a similar sized settlement to Athelstaneford, with a railway station, and in a location where other improvements are identified elsewhere in the LDP which can be facilitated (in part) by development at Drem, and elsewhere. This should be shown on the Main Strategy Diagram because the safeguarding sought can contribute to delivering the strategy identified.

At Para 1.5 there are references to the Proposals Maps identifying areas "where land is safeguarded so as not to prejudice a certain type of development occurring" or to "ensure an area can be considered as a potential future development location".

However, from our review of the Plan we can only see one safeguard (at Blindwells), but there are references in the Plan to other potential locations which have not been safeguarded (such as at Drem at Para 2.154) and we believe they should (particularly given the comments, at Para 1.15 and at Para 2.7, that

"settlements further east are also near the limit of what can be achieved in the way of expansion without significantly changing their character").

We believe that the future potential for development at Drem is acknowledged by the Council in not identifying a Countryside Around Towns designation at this location as they have done elsewhere at more developed settlements in this plan.

The identification of a safeguarded area (as shown on our "Vision for Drem" document submitted with these representations) would give the owners of the land, developers, and infrastructure providers the confidence to invest significant sums in the necessary investigations and surveys that would be required to fully demonstrate the effectiveness, deliverability, and delivery of necessary infrastructure, at the time that they are required, to avoid the sometimes significant lead in times associated with these types of large scale developments (as referenced at Para 2.11). The Plan should safeguard the potential for development at Drem in a similar manner to, and consistent with, the approach taken at Blindwells, for the same reasons.

At Para 1.29 the Plan refers to the west of East Lothian being the most accessible part, however it is not as though the east of East Lothian is completely inaccessible and Drem, for example, benefits from a frequent am and pm peak service (as referenced in our "Vision for Drem" document), and a bus service which could be enhanced as part of an expansion of Drem, which is something that should be capitalised on in the future planning of East Lothian focussing on existing sustainable transport options, particularly given the statements about the capacity of other settlements in the area to accommodate further development.

This potential, and future need, also seems to be acknowledged in the emerging SESplan (Proposed Plan Para 3.13) where it states "Any further development requirements for East Lothian will be dispersed to locations further east along the Long Term Growth Corridors. Subject to future growth requirements for East Lothian, there may be a need for a second new settlement in the east of East Lothian". Drem lies within the East Coast SDA which, as confirmed by the Council in the Proposed Plan (at Para 1.49), "follows the key transport corridor of the A1 and East Coast railway line from Musselburgh to Dunbar" and we believe is what is being reference as a potential location to meet future needs. Given the lead in times to delivering the Blindwells new settlement, we believe a safeguarding is required to preserve this potential and allow the necessary work to be undertaken to bring forward the development at the appropriate time.

Para 1.30 of the Plan identifies the existing deficiencies (many of which have been caused by the cumulative impact of population growth Para 1.33) in the rail network, station car parking, and introduces the possibility of a four track section of rail out to Drem and whilst we acknowledged these issues and the need to resolve them, we find it strange that of the six identified settlements with rail stations Drem is the only location (which also lies within the East Coast SDA) with no development identified in the short, medium or longer term.

At Para 1.49 the Plan states that "The SDP is clear that land allocations made by previous plans are to be carried forward and must be complemented and not undermined by land allocations made by LDPs". It should be borne in mind that this support for the continuation of existing sites is not replicated in the emerging version of SESplan (Proposed Plan Para 5.10) which clearly states that "SESplan member authorities will also consider deallocating sites carried over from multiple plan cycles where action taken has proved ineffective in making them deliverable...". Therefore, whilst the Council may believe at present that there is a sufficient supply of land identified, it is possible that through future reviews of the Plan and the land allocations, that this situation will change (including at Blindwells), reinforcing the rationale in safeguarding further medium to long term growth areas to supplement the supply and to provide for the future.

Development at Drem, within the East Coast Strategic Development Area, over the medium to long term meets many of the Aims, Objectives and Outcomes of the Plan (set out at Para 1.61), particularly those relating to sustainability, and helps achieve the Councils aspiration (at Para 1.41 that "future development of the area occurs in a sustainable way") as well as providing opportunities to meet future need and demand.

Whilst we acknowledge the spatial strategy of this Plan is a compact one, the spatial strategy of future plans is likely to be more dispersed given the significant development identified in the west of the area (as referenced in emerging SESplan Proposed Plan), and the limited capacity of most settlements in the east of the area to accommodate further development. The current strategy, and any alternative strategy in the future, will necessitate the loss of Grade 1 Agricultural Land. The land at Drem is identified as being Grade 1, 2 and 3.1 by the Scottish Governments Land Capability for Agriculture Mapping, with the lower quality land lying to the south of the railway.

Development at Drem is not considered to be any more complex than that being considered at Blindwells and should be identified in a similar manner as alluded to in other parts of the plan for the same reasons.

Regard has been had in preparing the enclosed "Vision for Drem" document to the special qualities of the adjacent Special Landscape Area; the Conservation Area; the identified built heritage in the locality; the potential to contribute to the green network and has arrived at a proposal which we believe identifies a logical safeguarding area balanced around the train station with logical pockets of development which respect (and enhance through detailed design) the setting of Drem, and other important features. We believe this shows that it is possible to maintain and reinforce the special character of the area, deliver walkable neighbourhoods, whilst rectifying known constraints. Further detailed technical assessment will be required. We have also submitted with the "Vision for Drem" document an Ecological Walkover Survey, and a Drainage Strategy which have been taken in to account in preparing the vision, and have not identified any significant impediments to development as shown on the Vision document from proceeding.

Section 2g - Introduction to North Berwick Cluster (pg 52)

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

Modifications(s) Sought:

At Para 2.154 (Page 52) introduce a new final sentence to the Para to the effect "A safeguarding of land has been identified at Drem to enable these issues to be resolved and a deliverable and effective proposal formulated for consideration in the review of the LDP".

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

Justification for Modification(s):

At 2.151 there is reference to Drem being the only settlement in this cluster within the SDA, with the majority of others with identified Countryside Around Towns

designations to protect their setting, and this should be acknowledged by way of a safeguarded area in this plan for the reasons provided under Section 2 Question 1a & 1b which are repeated below for completeness.

Drem is a similar sized settlement to Athelstaneford, with a railway station, and in a location where other improvements are identified elsewhere in the LDP which can be facilitated (in part) by development at Drem, and elsewhere. This should be shown on the Main Strategy Diagram because the safeguarding sought can contribute to delivering the strategy identified.

At Para 1.5 there are references to the Proposals Maps identifying areas "where land is safeguarded so as not to prejudice a certain type of development occurring" or to "ensure an area can be considered as a potential future development location". However, from our review of the Plan we can only see one safeguard (at Blindwells), but there are references in the Plan to other potential locations which have not been safeguarded (such as at Drem at Para 2.154) and we believe they should (particularly given the comments, at Para 1.15 and at Para 2.7, that "settlements further east are also near the limit of what can be achieved in the way of expansion without significantly changing their character").

We believe that the future potential for development at Drem is acknowledged by the Council in not identifying a Countryside Around Towns designation at this location as they have done elsewhere at more developed settlements in this plan.

The identification of a safeguarded area (as shown on our "Vision for Drem" document submitted with these representations) would give the owners of the land, developers, and infrastructure providers the confidence to invest significant sums in the necessary investigations and surveys that would be required to fully demonstrate the effectiveness, deliverability, and delivery of necessary infrastructure, at the time that they are required, to avoid the sometimes significant lead in times associated with these types of large scale developments (as referenced at Para 2.11). The Plan should safeguard the potential for development at Drem in a similar manner to, and consistent with, the approach taken at Blindwells, for the same reasons.

At Para 1.29 the Plan refers to the west of East Lothian being the most accessible part, however it is not as though the east of East Lothian is completely inaccessible and Drem, for example, benefits from a frequent am and pm peak service (as referenced in our "Vision for Drem" document), and a bus service which could be enhanced as part of an expansion of Drem, which is something that should be capitalised on in the future planning of East Lothian focussing on existing sustainable transport options, particularly given the statements about the capacity of other settlements in the area to accommodate further development.

This potential, and future need, also seems to be acknowledged in the emerging SESplan (Proposed Plan Para 3.13) where it states "Any further development requirements for East Lothian will be dispersed to locations further east along the Long Term Growth Corridors. Subject to future growth requirements for East Lothian, there may be a need for a second new settlement in the east of East Lothian". Drem lies within the East Coast SDA which, as confirmed by the Council in the Proposed Plan (at Para 1.49), "follows the key transport corridor of the A1 and East Coast railway line from Musselburgh to Dunbar" and we believe is what is being reference as a potential location to meet future needs. Given the lead in times to delivering the Blindwells new settlement, we believe a safeguarding is required to preserve this potential and allow the necessary work to be undertaken to bring forward the development at the appropriate time.

Para 1.30 of the Plan identifies the existing deficiencies (many of which have been caused by the cumulative impact of population growth Para 1.33) in the rail network, station car parking, and introduces the possibility of a four track section of rail out to Drem and whilst we acknowledged these issues and the need to resolve them, we find it strange that of the six identified settlements with rail stations Drem is the only location (which also lies within the East Coast SDA) with no development identified in the short, medium or longer term.

At Para 1.49 the Plan states that "The SDP is clear that land allocations made by previous plans are to be carried forward and must be complemented and not undermined by land allocations made by LDPs". It should be borne in mind that this support for the continuation of existing sites is not replicated in the emerging version of SESplan (Proposed Plan Para 5.10) which clearly states that "SESplan member authorities will also consider deallocating sites carried over from multiple plan cycles where action taken has proved ineffective in making them deliverable...". Therefore, whilst the Council may believe at present that there is a sufficient supply of land identified, it is possible that through future reviews of the Plan and the land allocations, that this situation will change (including at Blindwells), reinforcing the rationale in safeguarding further medium to long term growth areas to supplement the supply and to provide for the future.

Development at Drem, within the East Coast Strategic Development Area, over the medium to long term meets many of the Aims, Objectives and Outcomes of the Plan (set out at Para 1.61), particularly those relating to sustainability, and helps achieve the Councils aspiration (at Para 1.41 that "future development of the area occurs in a sustainable way") as well as providing opportunities to meet future need and demand.

Whilst we acknowledge the spatial strategy of this Plan is a compact one, the spatial strategy of future plans is likely to be more dispersed given the significant development identified in the west of the area (as referenced in emerging SESplan Proposed Plan), and the limited capacity of most settlements in the east of the area to accommodate further development. The current strategy, and any alternative strategy in the future, will necessitate the loss of Grade 1 Agricultural Land. The land at Drem is identified as being Grade 1, 2 and 3.1 by the Scottish Governments Land Capability for Agriculture Mapping, with the lower quality land lying to the south of the railway.

Development at Drem is not considered to be any more complex than that being considered at Blindwells and should be identified in a similar manner as alluded to in other parts of the plan for the same reasons.

Regard has been had in preparing the enclosed "Vision for Drem" document to the special qualities of the adjacent Special Landscape Area; the Conservation Area; the identified built heritage in the locality; the potential to contribute to the green network and has arrived at a proposal which we believe identifies a logical safeguarding area balanced around the train station with logical pockets of development which respect (and enhance through detailed design) the setting of Drem, and other important features. We believe this shows that it is possible to maintain and reinforce the special character of the area, deliver viable neighbourhoods, whilst rectifying known constraints. Further detailed technical assessment will be required. We have also submitted with the "Vision for Drem" document an Ecological Walkover Survey, and a Drainage Strategy which have been taken in to account in preparing the vision, and have not identified any significant impediments to development as shown on the Vision document from proceeding.

Section 2g - North Berwick Main Development Proposals (pages 53-56)

1a PROP NK1: Mains Farm, North Berwick - What modifications do you wish to see made to Prop NK1 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

1b Please give any information/reasons in support of each modification suggested to Prop NK1 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

2a PROP NK2: North Berwick High School and Law Primary School Expansion Land - What modifications do you wish to see made to Prop NK2 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

2b Please give any information/reasons in support of each modification suggested to Prop NK2 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

3a PROP NK3: Gilsland, North Berwick - What modifications do you wish to see made to Prop NK3 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

3b Please give any information/reasons in support of each modification suggested to Prop NK3 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

4a PROP NK4: Land at Tantallon Road, North Berwick - What modifications do you wish to see made to Prop NK4 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

4b Please give any information/reasons in support of each modification suggested to Prop NK4 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

5a PROP NK5: Land at Ferrygate Farm, North Berwick - What modifications do you wish to see made to Prop NK5 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

5b Please give any information/reasons in support of each modification suggested to Prop NK5 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

6a PROP NK6: Former Fire Training School, Gullane - What modifications do you wish to see made to Prop NK6 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

6b Please give any information/reasons in support of each modification suggested to Prop NK6 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

7a PROP NK7: Saltcoats, Gullane - What modifications do you wish to see made to Prop NK7 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

7b Please give any information/reasons in support of each modification suggested to Prop NK7 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

8a PROP NK8: Fenton Gait East, Gullane - What modifications do you wish to see made to Prop NK8 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

8b Please give any information/reasons in support of each modification suggested to Prop NK8 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

9a PROP NK9: Fenton Gait South, Gullane - What modifications do you wish to see made to Prop NK9 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

9b Please give any information/reasons in support of each modification suggested to Prop NK9 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

10a PROP NK10: Aberlady West, Aberlady - What modifications do you wish to see made to Prop NK10 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

10b Please give any information/reasons in support of each modification suggested to Prop NK10 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

11a PROP NK11: Castlemains, Dirleton - What modifications do you wish to see made to Prop NK11 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

11b Please give any information/reasons in support of each modification suggested to Prop NK11 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

12a Policy NK12: Development Briefs - What modifications do you wish to see made to Policy NK12 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

Introduce a new "PROP NK12: Safeguarded Drem Expansion Area land north and south of Drem" (on Page 56) as identified on the Vision for Drem document, which would read:

"Land is safeguarded to the north and south of Drem for a potential expansion of Drem. The landowner/developer will prepare a Design Framework for the Drem Expansion Area spatially, including its associated infrastructure requirements. This Design Framework will be the basis against which the Council will seek to confirm if a comprehensive solution for the development of the area exists, as well as development agreements between the two landowners. The Design Framework should also provide information on delivery mechanisms for the provision and phasing of shared infrastructure as necessary to enable an appropriate phasing and timing of development. If a comprehensive solution to the known issues is found, the conversion from safeguarding to allocation shall be considered through the review of the LDP, or sooner in the event of a failure in the 5 year land supply emerging."

Renumber Policy NK12: Development Briefs to Policy NK13: Development Briefs.

12b Please give any information/reasons in support of each modification suggested to Policy NK12 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

The introduction of a new PROP NK12: Drem Expansion Area necessitates a renumbering of the subsequent Policy.

As set out elsewhere in our responses to Section 2 and Section 3 of the Plan we believe there will be a need in the medium to longer term for a development at Drem, which we believe has significant merit. We believe it is appropriate, and consistent with national policy (SPP and NPF3) to identify this opportunity now. We have repeated below our response to Section 2 for completeness.

Drem is a similar sized settlement to Athelstaneford, with a railway station, and in a location where other improvements are identified elsewhere in the LDP which can be facilitated (in part) by development at Drem, and elsewhere. This should be shown on the Main Strategy Diagram because the safeguarding sought can

contribute to delivering the strategy identified.

At Para 1.5 there are references to the Proposals Maps identifying areas “where land is safeguarded so as not to prejudice a certain type of development occurring” or to “ensure an area can be considered as a potential future development location”.

However, from our review of the Plan we can only see one safeguard (at Blindwells), but there are references in the Plan to other potential locations which have not been safeguarded (such as at Drem at Para 2.154) and we believe they should (particularly given the comments, at Para 1.15 and at Para 2.7, that “settlements further east are also near the limit of what can be achieved in the way of expansion without significantly changing their character”).

We believe that the future potential for development at Drem is acknowledged by the Council in not identifying a Countryside Around Towns designation at this location as they have done elsewhere at more developed settlements in this plan.

The identification of a safeguarded area (as shown on our “Vision for Drem” document submitted with these representations) would give the owners of the land, developers, and infrastructure providers the confidence to invest significant sums in the necessary investigations and surveys that would be required to fully demonstrate the effectiveness, deliverability, and delivery of necessary infrastructure, at the time that they are required, to avoid the sometimes significant lead in times associated with these types of large scale developments (as referenced at Para 2.11). The Plan should safeguard the potential for development at Drem in a similar manner to, and consistent with, the approach taken at Blindwells, for the same reasons.

At Para 1.29 the Plan refers to the west of East Lothian being the most accessible part, however it is not as though the east of East Lothian is completely inaccessible and Drem, for example, benefits from a frequent am and pm peak service (as referenced in our “Vision for Drem” document), and a bus service which could be enhanced as part of an expansion of Drem, which is something that should be capitalised on in the future planning of East Lothian focussing on existing sustainable transport options, particularly given the statements about the capacity of other settlements in the area to accommodate further development.

This potential, and future need, also seems to be acknowledged in the emerging SESplan (Proposed Plan Para 3.13) where it states “Any further development requirements for East Lothian will be dispersed to locations further east along the Long Term Growth Corridors. Subject to future growth requirements for East Lothian, there may be a need for a second new settlement in the east of East Lothian”. Drem lies within the East Coast SDA which, as confirmed by the Council in the Proposed Plan (at Para 1.49), “follows the key transport corridor of the A1 and East Coast railway line from Musselburgh to Dunbar” and we believe is what is being reference as a potential location to meet future needs. Given the lead in times to delivering the Blindwells new settlement, we believe a safeguarding is required to preserve this potential and allow the necessary work to be undertaken to bring forward the development at the appropriate time.

Para 1.30 of the Plan identifies the existing deficiencies (many of which have been caused by the cumulative impact of population growth Para 1.33) in the rail network, station car parking, and introduces the possibility of a four track section of rail out to Drem and whilst we acknowledged these issues and the need to resolve them, we find it strange that of the six identified settlements with rail stations Drem is the only location (which also lies within the East Coast SDA) with no development identified in the short, medium or longer term.

At Para 1.49 the Plan states that “The SDP is clear that land allocations made by previous plans are to be carried forward and must be complemented and not undermined by land allocations made by LDPs”. It should be borne in mind that this support for the continuation of existing sites is not replicated in the emerging version of SESplan (Proposed Plan Para 5.10) which clearly states that “SESplan member authorities will also consider deallocating sites carried over from multiple plan cycles where action taken has proved ineffective in making them deliverable...”. Therefore, whilst the Council may believe at present that there is a sufficient supply of land identified, it is possible that through future reviews of the Plan and the land allocations, that this situation will change (including at Blindwells), reinforcing the rationale in safeguarding further medium to long term growth areas to supplement the supply and to provide for the future.

Development at Drem, within the East Coast Strategic Development Area, over the medium to long term meets many of the Aims, Objectives and Outcomes of the Plan (set out at Para 1.61), particularly those relating to sustainability, and helps achieve the Councils aspiration (at Para 1.41 that “future development of the area occurs in a sustainable way”) as well as providing opportunities to meet future need and demand.

Whilst we acknowledge the spatial strategy of this Plan is a compact one, the spatial strategy of future plans is likely to be more dispersed given the significant development identified in the west of the area (as referenced in emerging SESplan Proposed Plan), and the limited capacity of most settlements in the east of the area to accommodate further development. The current strategy, and any alternative strategy in the future, will necessitate the loss of Grade 1 Agricultural Land. The land at Drem is identified as being Grade 1, 2 and 3.1 by the Scottish Governments Land Capability for Agriculture Mapping, with the lower quality land lying to the south of the railway.

Development at Drem is not considered to be any more complex than that being considered at Blindwells and should be identified in a similar manner as alluded to in other parts of the plan for the same reasons.

Regard has been had in preparing the enclosed “Vision for Drem” document to the special qualities of the adjacent Special Landscape Area; the Conservation Area; the identified built heritage in the locality; the potential to contribute to the green network and has arrived at a proposal which we believe identifies a logical safeguarding area balanced around the train station with logical pockets of development which respect (and enhance through detailed design) the setting of Drem, and other important features. We believe this shows that it is possible to maintain and reinforce the special character of the area, deliver walkable neighbourhoods, whilst rectifying known constraints. Further detailed technical assessment will be required. We have also submitted with the “Vision for Drem” document an Ecological Walkover Survey, and a Drainage Strategy which have been taken in to account in preparing the vision, and have not identified any significant impediments to development as shown on the Vision document from proceeding.

Section 3a - Planning for Housing (pages 64 - 73)

1a Housing & Housing Land Requirement - What modifications do you wish to see made to the Housing & Housing Land Requirement 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:

Introduce a new Para 3.37 (on Page 64) with the heading “Drem Expansion Areas Role in Meeting Housing Land Requirements” to the effect:

"The vision for the Drem Expansion Area is the creation and delivery of a sustainable mixed community, within an SDA, in a sustainable location, that contributes to the Housing Land Requirements post 2019 and beyond. The SDP allows for, in circumstances where there is a failure in the 5 year land supply, the early draw down of land identified in the plan before unallocated greenfield land can be brought forward. The identification of a safeguard provides landowners and developers with the confidence to invest significant resources to resolve issues to facilitate delivery post 2019 and for the Council to bring forward the early release of this identified development opportunity, in a plan led manner, the event of a failure in the 5 year land supply".

Amend the current (or re-numbered) Para 3.37 to read "Blindwells and Drem are intended..." and "...of a larger new settlement, or expansion area, is found."
Re-number subsequent Paras as a result.

1b Please give any information/reasons in support of each modification suggested to Housing and Housing land Requirement 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):

Para 3.32 (Page 64) highlights the Councils commitment to continuing to support the development of housing sites in the established housing land supply. This is noted, however, the emerging SESplan (Para 5.10) highlights that where sites have been carried forward from multiple plans without delivery being achieved, they should be removed from the plan in favour of more effective and deliverable sites, which could result in a reasonably significant change in the land supply during the review of the LDP and further sites may be required earlier than envisaged, and sites will definitely be required in the medium to long term as highlighted in emerging SESplan. With the identified capacity issues surrounding some settlements where "Countryside Around Towns" designations have been identified, we believe there could be limited opportunities to meet the subsequent shortfall, and certainty needs to be provided.

Para 3.37 (Page 64) states that in considering housing development post 2024, to meet the currently identified requirement, the "LDP does identify and safeguard potential opportunities". The LDP actually only contains one safeguard (at Blindwells) and we believe there is significant merit in taking a similar approach to a Drem Expansion Area (as shown on our "Vision for Drem" document submitted with these representations) to enable a plan led approach to be taken to meeting failures in the 5 year land supply that arise, and to provide an effective and deliverable proposal to be formulated to convert the safeguarding in to an allocation through the review of the LDP. SESplan 2 indicates that all Council areas will require further housing land in the 2030-2038 period, if not before, through a review of the SDP. The preference will likely continue to be for sites within SDAs, then others, and there are limited alternative options for significant development in the east of East Lothian.

Introducing an additional safeguard will allow for land to be drawn down early on identified sites, in a plan led manner, in the event of a failure in the 5 year land supply emerging which is in line with the approach advocated in SESplan (Policy 6).

2a Established Housing Land Supply - What modifications do you wish to see made to the Established Housing Land Supply 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:

Amend Para 3.38 (on Page 64) to read "...Housing Land Audit 2015, and safeguarded areas have been identified which will enable any changes to this to be met in a plan led manner".

Amend Table HOU1: Housing Proposals by Cluster Area (on Page 66) to include in a similar manner to Blindwells a LDP Safeguard in the North Berwick Cluster as follows (unfortunately the portal does not allow for the insertion of tables);

Under LDP Safeguards in the North Berwick Cluster add "NK12" under Site Ref; add "Drem Expansion Area" under LDP Safeguards and add "2,000" under Capacity with subsequent amendments to the Total columns to reflect this change.

2b Please give any information/reasons in support of each modification suggested to the Established Housing Land Supply 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):

We note the Councils commitment to continuing support for the principle of appropriate residential development on sites of the established housing land supply as set out in the 2015 Housing Land Audit. We have not been provided with the 2016 HLA to consider the programming for individual sites, but Appendix 2 of the Councils Technical Note 1 provides a summary of this. We are not clear however whether this has been agreed with Homes for Scotland, or whether there will be change to this. Therefore we are unclear of the accuracy of the assumptions made in that document to support the achievement and maintenance of a minimum effective 5 year land supply at all times.

The Councils Technical Note 1 analyses the difference between SPP 2010 and SPP 2014 and their approach to calculating the housing land requirement, and the housing land supply, as well as issues such as the margin for generosity. This was considered in detail in Issue 5 of the Edinburgh LDP Examination Report and it was concluded that the LDP must conform to the current SDP and that generosity was to be added as part of preparing the LDP as it had not been added in preparing the SDP. In that case the Examination Reporter nevertheless gave weight to the 10%-20% generosity margin contained in SPP 2014.

Table 16b of the Councils Technical Note 1 seems to indicate a shortfall of housing in the 2024 to 2032 period of some 1,107 homes, and it should be borne in mind that there may be other sites which fail to deliver in the in between time which would support the identification of a safeguarding at Drem to enable the proposal to be further investigated to ensure delivery at a time when it is required as part of a plan led approach to meeting housing need and demand in the locality.

3a Maintaining an Adequate Effective Five-Year Housing Land Supply - What modifications do you wish to see made to the Maintaining an adequate Effective Five-Year Housing Land Supply 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:

Identify Drem as a development safeguard as set out elsewhere in our representations.

3b Please give any information/reasons in support of each modification suggested to the Maintaining an Adequate Five-Year Housing Land Supply 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):**

We do not dispute that the Plan has numerically identified sufficient housing land to meet, and slightly exceed, the Housing Land Requirement, however, when the programming of these sites is examined in detail, we believe that there would be merit in safeguarding further land (at Drem Expansion Area) for future development.

The advantage of this approach to the Council is that, in the event of a failure in the 5 year land supply developing, or a significant delay to the review of the LDP resulting in a policy void, or a further housing requirement being identified through a review of the SDP, it would be possible to (in line with SESplan Policy 6) provide for identified land to be drawn down earlier (with a preference on land within SDAs) which could assist in resisting unallocated, greenfield and greenbelt sites being brought forward to meet the shortfall. This would result in a more plan led resolution to the issues rather than being forced to consider the first site that comes forward.

Para 3.37 states that the "LDP does identify and safeguard potential opportunities", however, from our reading of the Plan there is in fact only one opportunity identified (at Blindwells) and safeguarded.

Table HOU2 contains a number of relatively minor, but nevertheless notable, calculation errors. For example (based on the current figures in the table), Sub-Total Housing Land Supply for 2009-19 should total 6,922 rather than 6,892; for 2019-2024 this should read 5,162 rather than 5,146; Total to 2024 should read 12,084 rather than 12,038; for 2024-32 this should read 1,936 rather than 1,912; with subsequent updates to the subsequent entries below and in the Total column.

At 3.43 we take issue with the statement "the SDPs requirements assumes that annual completion rates of more than double the highest level delivered in East Lothian can be achieved" whilst at this stage, that is correct, it has taken 6 years to produce this plan which has inevitably compounded this issue.

Policy HOU2 should focus attention in the first instance on sites identified in the plan programmed for a future period, before considering land not identified in the plan. This approach would be in line with SESplan Policy 6 and be a preferable, plan led, way to rectify a shortfall in the first instance.

4a Affordable Housing - What modifications do you wish to see made to the Affordable Housing section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.**Modifications(s) Sought:****4b Please give any information/reasons in support of each modification suggested to the Affordable Housing section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.****Justification for Modification(s):****5a Specialist Housing Provision & Other Specific Needs - What modifications do you wish to see made to Specialist Housing Provision & Other Specific Needs 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 Specialist Housing Provision & Other Specific Needs 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 & 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:**

Clarify the area safeguarded for enhanced car parking provision at Drem Train Station (Ref: PROP T9) and identify an area north and south of the railway (see Vision for Drem - Preliminary Development Framework Plan (Page 15)) as part of a wider safeguarding for the potential Drem Expansion Area.

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) :**

Earlier versions of the plan had sought the provision of additional car parking at Drem railway station to rectify existing deficiencies resulting from previous distribution of development strategies and to facilitate further car based travel to and from it (from settlements outwith the Strategic Development Area), instead of

facilitating development around the train station all of which could be within walking distance.

Whilst this designation appears to be retained in the plan (Ref Para 4.20 and PROP T9) it is not clearly indicated on Inset Map 10 for Drem. We believe this should be delivered with associated development in the Drem Expansion Area over the medium and longer term. Given the lead in times associated with the new station at East Linton, and the steps still to be taken to deliver that, the potential for a new station at Blindwells is something which should probably be safeguarded but should be considered a very long way off indeed.

We believe there is also merit in providing railway station car parking at Drem both to the north and to the south of the station to accommodate any travellers arriving from the south to avoid those travellers navigating a narrow hump back bridge and then crossing the flow of traffic (twice) to arrive at the current/expanded car park.

Prop T10 allows for platform lengthening at Drem, however, it stands to reason that if the platforms are extended providing additional capacity, there will be a subsequent requirement for additional station car parking, unless development is facilitated around the station (which would provide for car free trips to the station and potentially contribute to the cost of extending the platforms.

Prop T13 allows for potential four track enhancement of the network to Drem which, as above, will provide additional capacity, which would make logical sense in the longer term to facilitate development around, rather than dispersing it to surrounding settlements and increasing the requirement for additional car parking.

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:

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):

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):

Proposals Map

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

Modifications(s) Sought:

Inset Map 10 – Identify a Safeguarding for Drem Expansion Area as identified in the Vision for Drem (Preliminary Development Framework Plan (Page 15)) document submitted with these representations.

More clearly identify the car parking safeguard, and introduce a new safeguard for car parking to the south of the railway at Drem.

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

Justification for Modification(s) :

Our reasoning here reflects that provided under Section 2 & 3. Also, this would be in line with Strategy Diagram 2: Transport in Section 4 and PROP T9 of the LDP which identifies "Park & Ride proposals" which we do not believe are clearly enough identified on the Inset Map.

Visual Upload:

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Visual Upload:

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A Vision for Drem

Land at Drem, East Lothian

A Revised Submission to the East Lothian Local Development Plan (Proposed Plan)

Prepared on behalf of James Millar (Kilduff) Ltd.

November 2016



**STRUTT
& PARKER**





Introduction

This revised Vision document has been prepared to illustrate our proposals for the sustainable growth of Drem, East Lothian and to support a safeguarding in the LDP for medium term development.

Our preliminary proposals have been designed to promote a balanced development strategy which responds to the local context and existing settlement form. The proposals are presented as a high level Preliminary Development Framework Plan and it is our intention to develop this further into a more detailed illustrative masterplan.

To inform this design development, we will work closely and in collaboration with East Lothian Council and all key stakeholders to ensure a masterplan is developed which complements the existing settlement and landscape context and creates a distinct sense of place.

If you do wish to provide any comments, please forward these to:

John Wright
Strutt & Parker LLP
5 St John Street
Perth
PH1 5SP

tel: 01738 567 892
email: john.wright@struttandparker.com

Our Vision for Drem

- ▶ A balanced development strategy offering the potential for sustainable growth which complements the existing settlement form, respects the principles of the Conservation Area, and responds to key views, built heritage designations, landscape features and designations, and ecological and drainage constraints;
- ▶ Creation of a distinct settlement form, which has a real sense of place and identity;
- ▶ Delivery of development across only two landholdings;
- ▶ All new development located within 800m walking distance of the railway station;
- ▶ Delivery of a western and southern bypass;
- ▶ Expanded railway station facilities, including new car parking located to the south of the railway as well as to the north;
- ▶ Provision of approximately 2000 new homes, including a range of house types and tenure;
- ▶ Provision of a site for a new Primary School;
- ▶ Provision of a new ramped, wheelchair friendly pedestrian crossing over the railway at an appropriate stage in the development;
- ▶ Development of a new village centre, including potential for a local shop, cafe, small business units, a pub, and community centre;
- ▶ A well connected village 'spine' offering direct access to the new village centre, the new primary school, areas of parkland / open space and the railway station;
- ▶ Extensive areas of open space, parkland and sports facilities connected via a comprehensive network of paths and cycleways;
- ▶ Expanding the Green Network by identification of potential connections to the existing Core Path network; and,
- ▶ Provision of a new foul drainage system

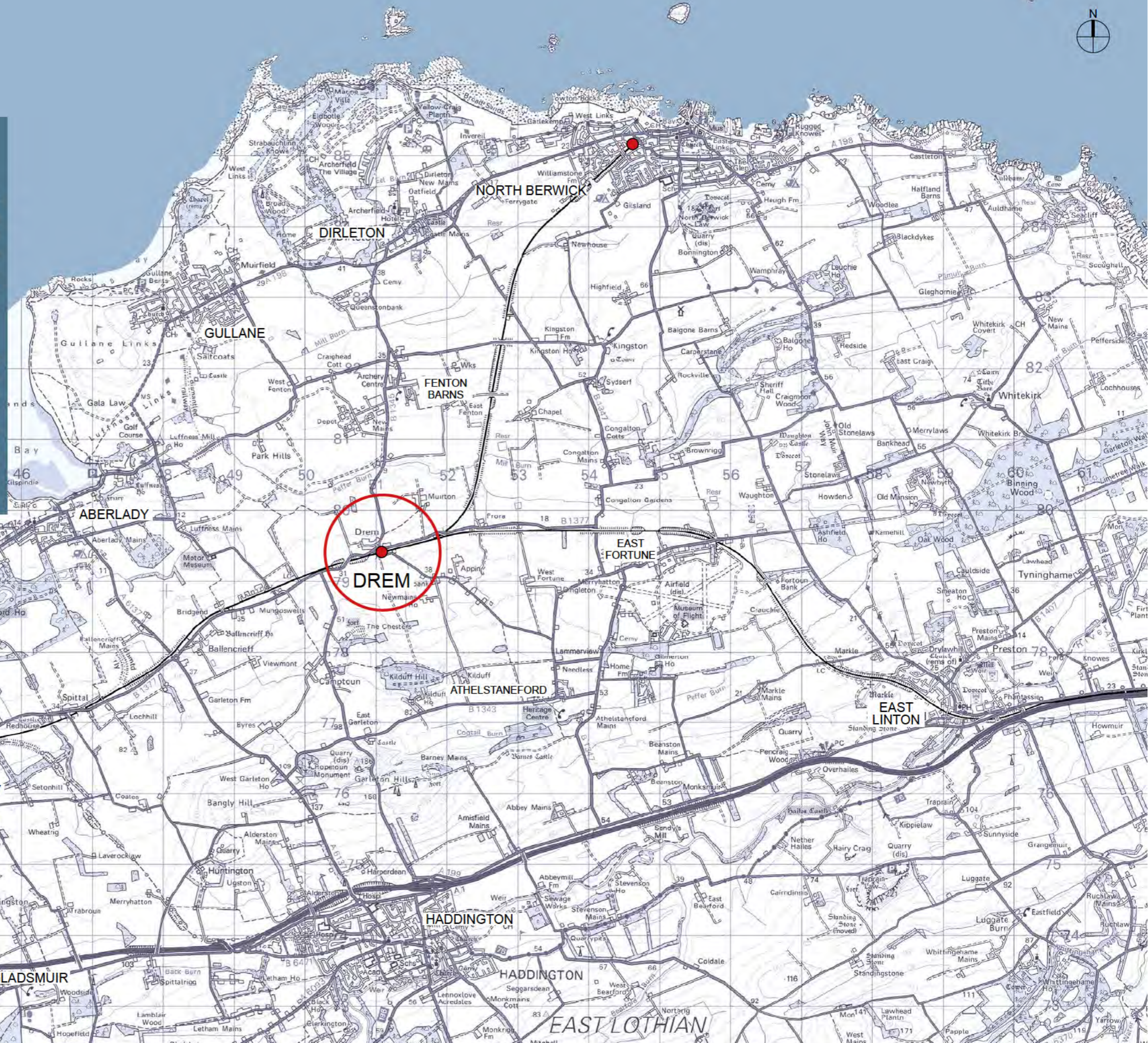


Section

2 Context

Drem is located approximately 20 miles to the east of Edinburgh within the extensive agricultural landscape which extends between the A1 road corridor and the Firth of Forth. The village is also located approximately midway between Haddington, to the south, and the string of larger settlements which extend along the coastal fringes (Longniddry, Aberlady, Gullane and North Berwick).

Drem is strategically located on the North Berwick to Edinburgh railway line, with regular hourly services available to these two destinations. The east coast main line also extends through the station however, no main line services currently stop at Drem. This facility is a key asset to the local community and its strategic location will form a key element in future sustainable growth proposals.



FIRTH OF FORTH

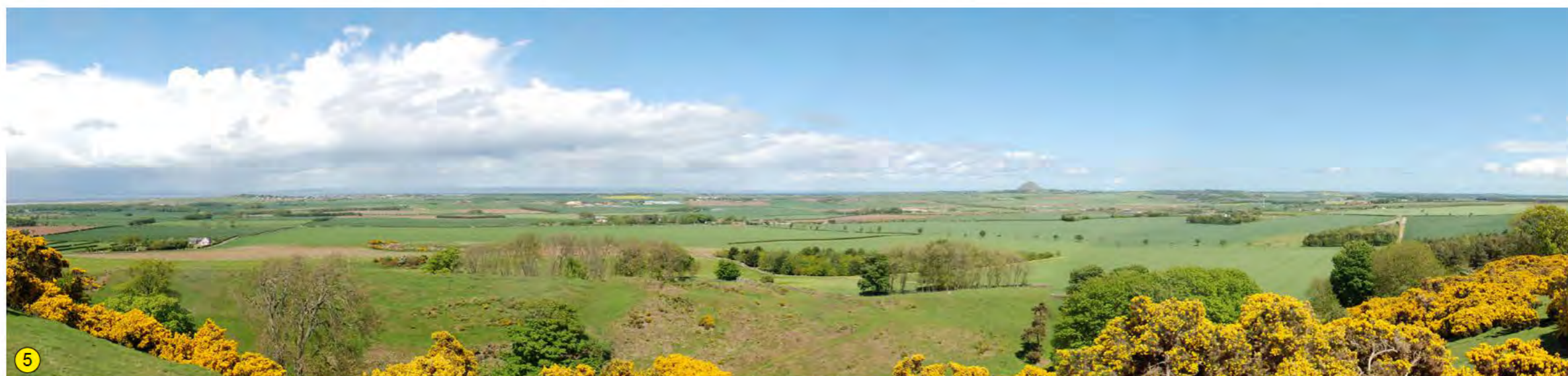
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GLADSMUIR

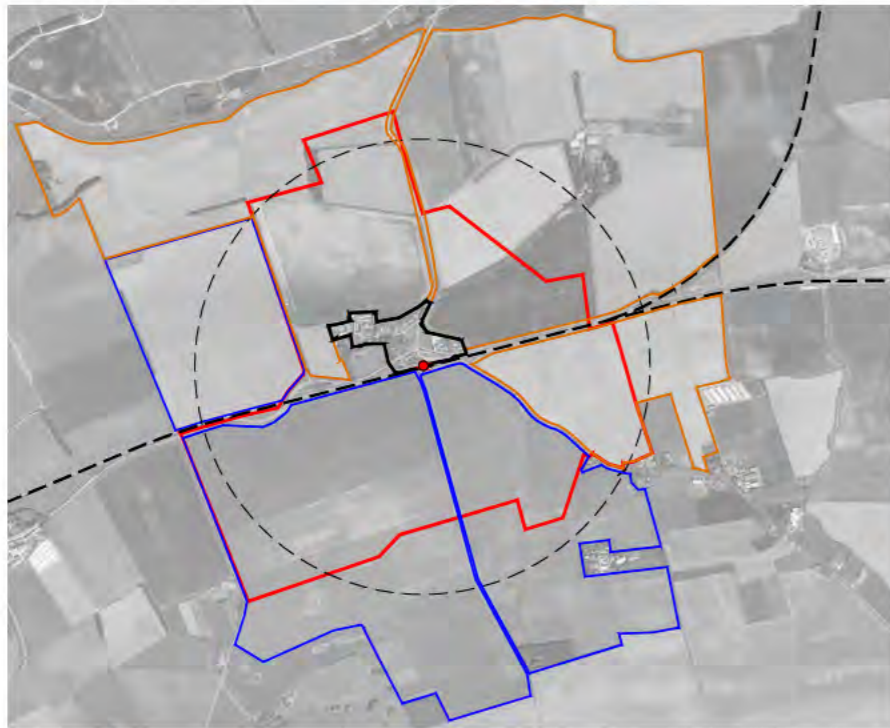
HADDINGTON

EAST LOTHIAN






- 1 Cottages fronting onto the green
- 2 A network of linked spaces and courtyards
- 3 The existing landscape structure
- 4 The northern edge of Drem
- 5 Elevated view from The Chesters hill fort overlooking the site



3 Site Analysis












Land Control

-  PROPOSED AREA TO BE SAFEGURADED WITHIN THE LDP
-  800m WALKING DISTANCE FROM STATION
-  RAILWAY LINE
-  LAND OWNERSHIP - JAMES MILLAR (KILDUFF) LTD.
-  LAND OWNERSHIP - CALA MANAGEMENT LTD










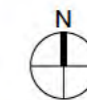
Access

-  PROPOSED AREA TO BE SAFEGURADED WITHIN THE LDP
-  800m WALKING DISTANCE FROM STATION
-  B ROADS
-  C ROADS
-  CORE PATHS
-  SUGGESTED CORE PATH LINKS ON QUIET ROADS
-  FUTURE CORE PATHS
-  OTHER PATHS / TRACKS
-  RAILWAY LINE

















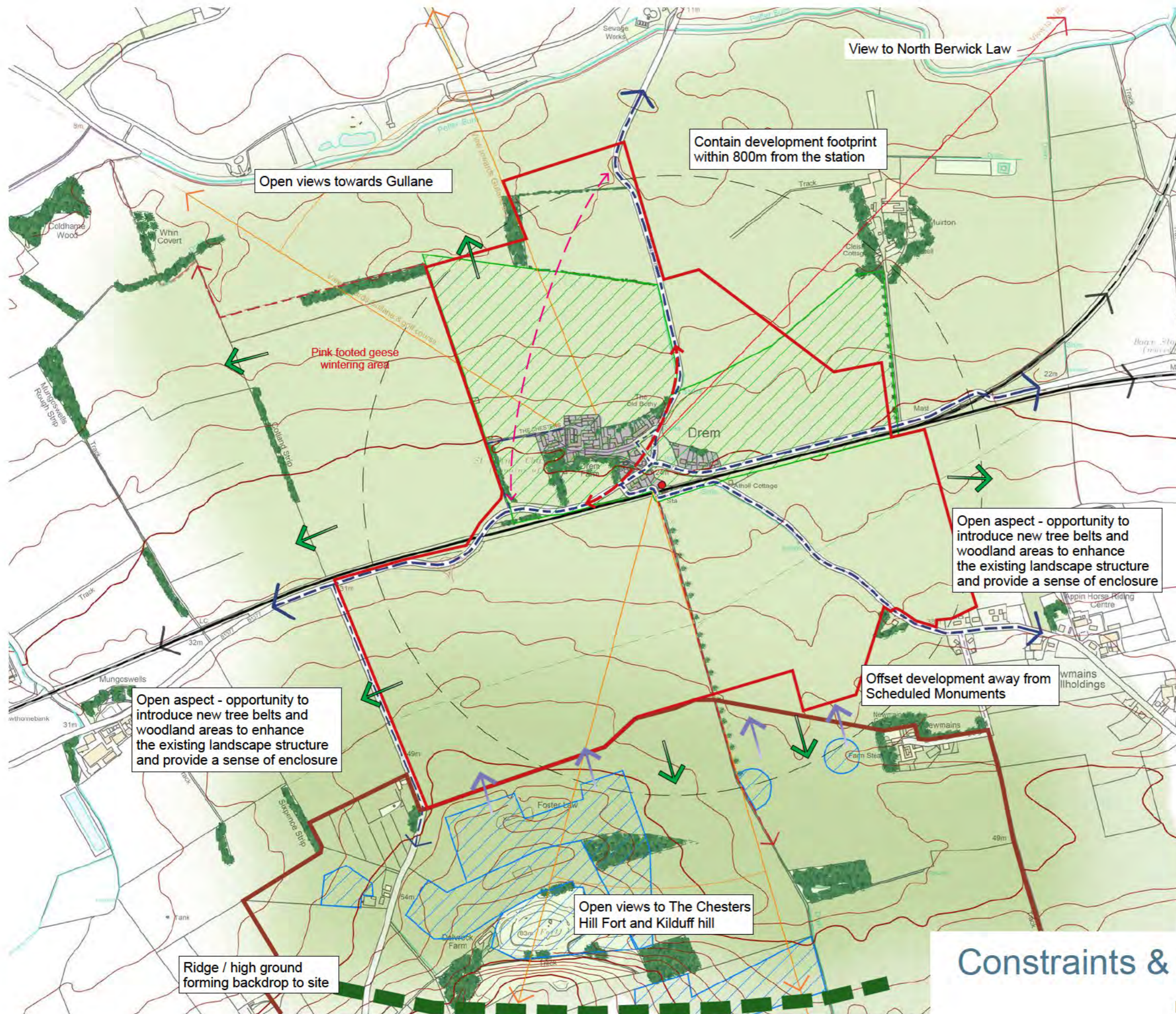
Planning

-  PROPOSED AREA TO BE SAFEGURADED WITHIN THE LDP
-  800m WALKING DISTANCE FROM STATION
-  RAILWAY LINE
-  SETTLEMENT BOUNDARY
-  CONSERVATION AREA
-  SCHEDULED MONUMENTS
-  PROPOSED GARLETON HILLS SPECIAL LANDSCAPE AREA (SLA)



Legend

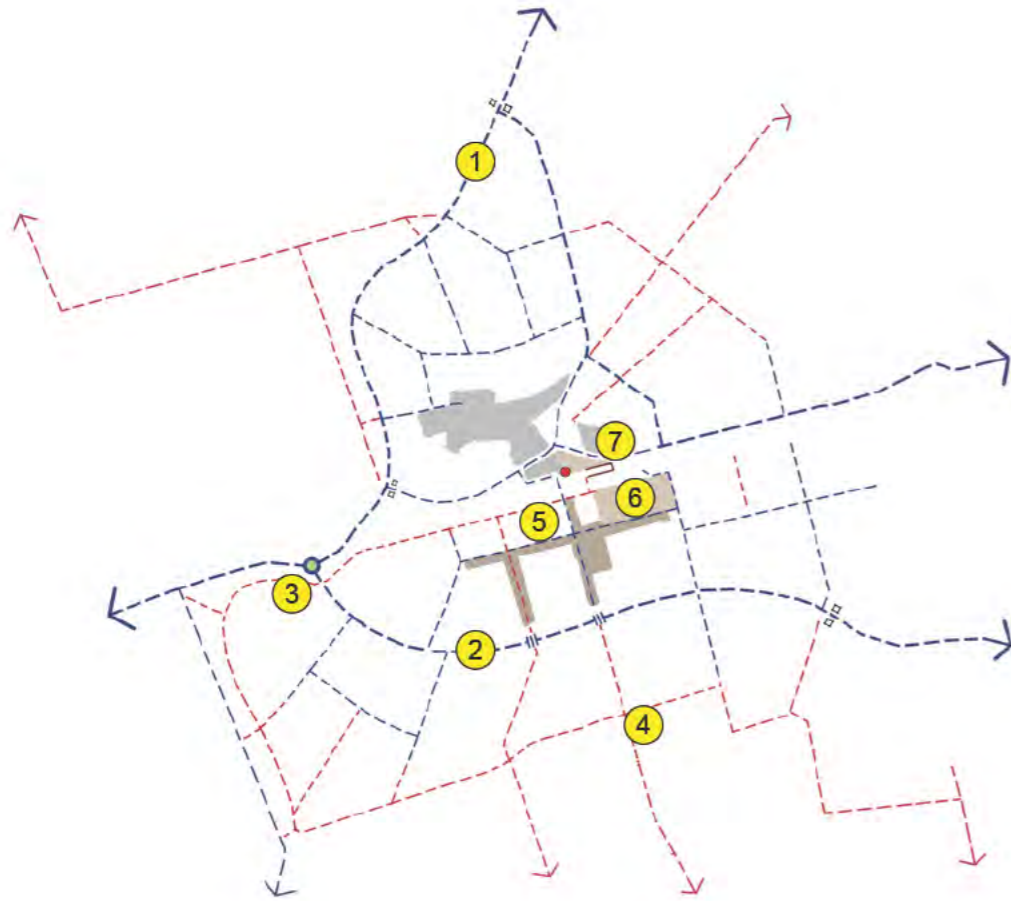
-  PROPOSED EXTENT OF LAND TO BE SAFEGUARDED WITHIN THE LDP
-  RAILWAY LINE
-  RAILWAY STATION
-  CONSERVATION AREA
-  PROPOSED GARLETON HILLS SPECIAL LANDSCAPE AREA (SLA)
-  EXISTING WOODLAND / TREE BELTS (INDICATIVE)
-  EXISTING ROADS
-  POTENTIAL FOR NEW ROAD LINK
-  TRAFFIC IMPACT ON EXISTING SETTLEMENT
-  SCHEDULED MONUMENTS
-  KEY VIEWS (PANORAMIC)
-  KEY VIEWS (POINT VIEW TOWARDS NORTH BERWICK LAW)
-  OPEN ASPECT TO EDGE OF SITE - OPPORTUNITY TO INTRODUCE TREE BELTS / WOODLAND AREAS
-  OFFSET DEVELOPMENT AWAY FROM SCHEDULED MONUMENTS



A Vision for Drem
Constraints & Opportunities Plan

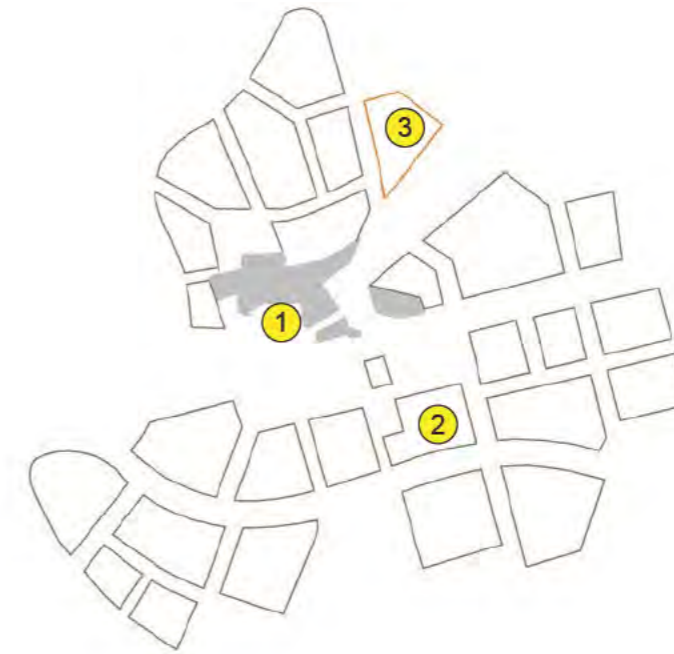
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The Vision



Access

- ① NORTH WESTERN BYPASS
- ② SOUTHERN BYPASS
- ③ NEW ROUNDABOUT JUNCTION
- ④ PATH NETWORK
- ⑤ VILLAGE CENTRE
- ⑥ NEW STATION CAR PARKING TO SOUTH OF RAILWAY
- ⑦ NEW PEDESTRIAN LINK OVER RAILWAY



Development compartments

- ① EXISTING BUILT FORM
- ② PROPOSED RESIDENTIAL DEVELOPMENT COMPARTMENTS
- ③ PROPOSED LOCATION FOR PRIMARY SCHOOL



Green infrastructure

- 1 GREEN CORRIDORS DESIGNED TO COMPLEMENT EXISTING VIEWS AND EXTEND GREEN SPACE INTO VILLAGE CENTRE
- 2 PARKLAND / AMENITY OPEN SPACE ON RISING LAND TO SOUTH
- 3 GREEN SPACE / BUFFER TO EXISTING NORTHERN EDGE OF DREM
- 4 NEW TREE BELTS / WOODLAND AREAS PROVIDING ENHANCED LANDSCAPE STRUCTURE AND SETTING TO THE EXPANDED SETTLEMENT FORM
- 5 SPORTS PITCHES LOCATED ADJACENT TO THE NEW PRIMARY SCHOOL



Combined development framework

- ▶ A BALANCED DEVELOPMENT STRATEGY OFFERING THE POTENTIAL FOR SUSTAINABLE GROWTH;
- ▶ CREATION OF A DISTINCT SETTLEMENT FORM, WHICH HAS A REAL SENSE OF PLACE AND IDENTITY;
- ▶ DELIVERY OF DEVELOPMENT ACROSS ONLY TWO LANDHOLDINGS;
- ▶ ALL NEW DEVELOPMENT LOCATED WITHIN 800M WALKING DISTANCE OF THE RAILWAY STATION;
- ▶ DELIVERY OF A WESTERN AND SOUTHERN BYPASS;
- ▶ EXPANDED RAILWAY STATION FACILITIES;
- ▶ PROVISION OF APPROXIMATELY 2000 NEW HOMES, INCLUDING A RANGE OF HOUSE TYPES AND TENURE;
- ▶ PROVISION OF A SITE FOR A NEW PRIMARY SCHOOL;
- ▶ PROVISION OF A NEW RAMPED, WHEELCHAIR FRIENDLY PEDESTRIAN CROSSING OVER THE RAILWAY;
- ▶ A NEW VILLAGE CENTRE, INC POTENTIAL FOR A LOCAL SHOP, CAFE, SMALL BUSINESS UNITS, A PUB, AND COMMUNITY CENTRE;
- ▶ A WELL CONNECTED VILLAGE 'SPINE' OFFERING DIRECT ACCESS TO ALL KEY FEATURES;
- ▶ EXTENSIVE AREAS OF OPEN SPACE, PARKLAND AND SPORTS FACILITIES;
- ▶ EXPAND GREEN NETWORK THROUGH POTENTIAL CONNECTIONS TO THE EXISTING CORE PATH NETWORK; AND,
- ▶ PROVISION OF A NEW FOUL DRAINAGE SYSTEM

Landscape Setting and Relationship to the Proposed Garleton Hills Special Landscape Area (SLA)

The development concept was originally designed to respect the landscape setting of Drem and other built heritage designations and retain development away from the northern slopes of Kilduff Hill, and the revised Preliminary Development Framework Plan presented here has been adjusted to reflect the specific boundary of the proposed Garleton Hills Special Landscape Area (SLA).

The Proposed Garleton Hills SLA

It is noted that development within Special Landscape Areas will only be permitted where:

- “1. it accords with the Statement of Importance and does not harm the special character of the area; or
2. the public benefits of the development clearly outweigh any adverse impact and the development is designed, sited and landscaped to minimise such adverse impacts”.

In addition, Technical Note 9 – Local Landscape Designations notes that “The purpose of designating Special Landscape Areas is to recognise the particular value of these landscapes in maintaining the distinctive sense of place in different areas of East Lothian. It is to make sure that these landscapes are not damaged by inappropriate development, and sometimes, to encourage positive landscape management. The purpose is not to prevent development, though some types of development may not be compatible with the aims of designation”.

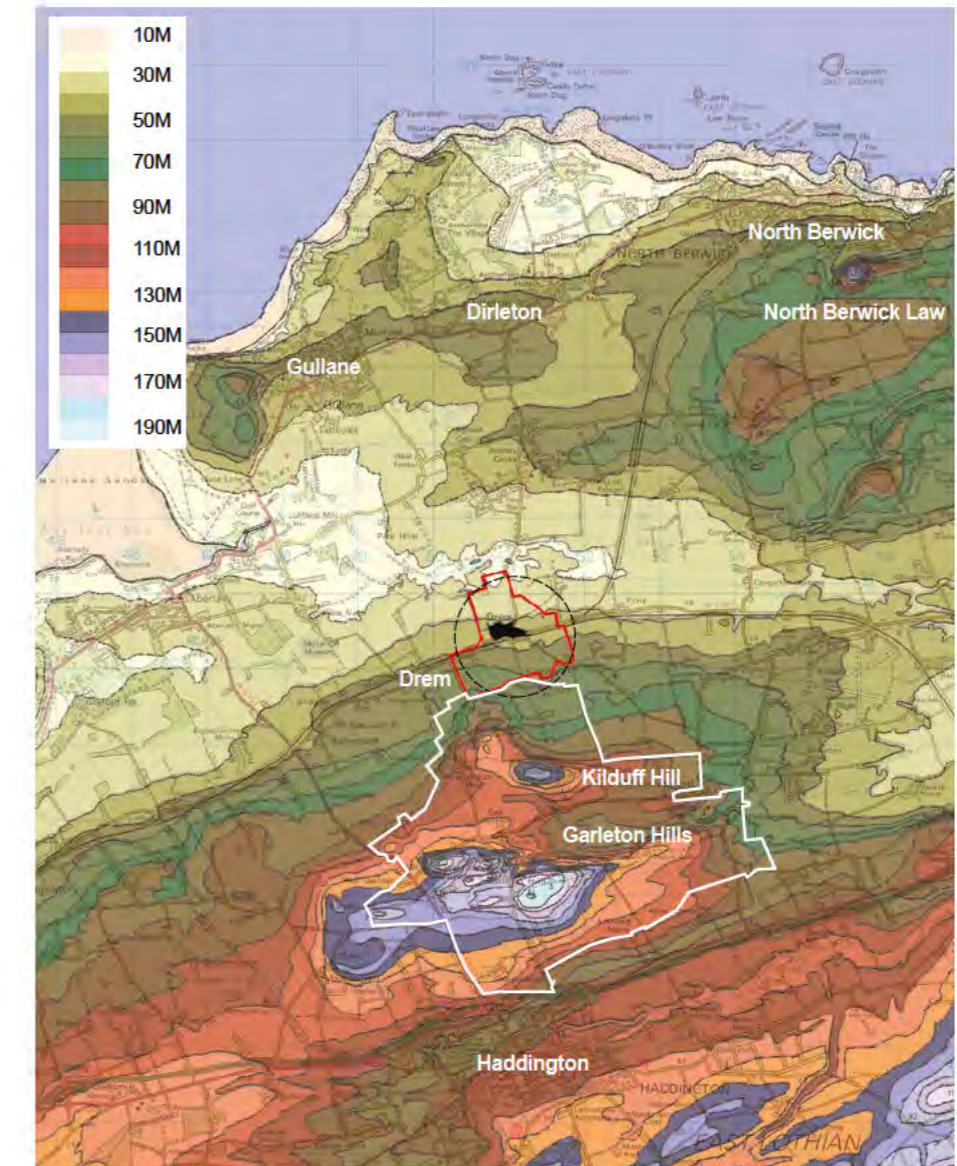
The Garleton Hills SLA Statement of Importance notes that “these hills are important in defining the character and appearance of East Lothian as a whole. Its contrasting landform and landcover to the surrounding arable land creates dramatic views and backdrops” and that “hills have high scenic value with an open, rugged outcrops and gorse covered crags, contrasting with the surrounding farmland”.

Design Response to the SLA

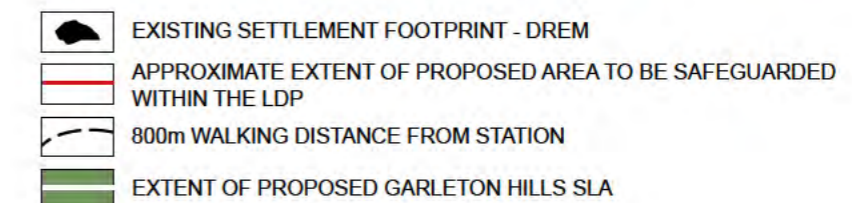
These key aspects of the landscape to the south of the proposed development area have been considered as part of the design process and a number of key design components have been introduced to ensure the relationship to the proposed SLA is complementary and that development will be set back from its northern edge.

These are:

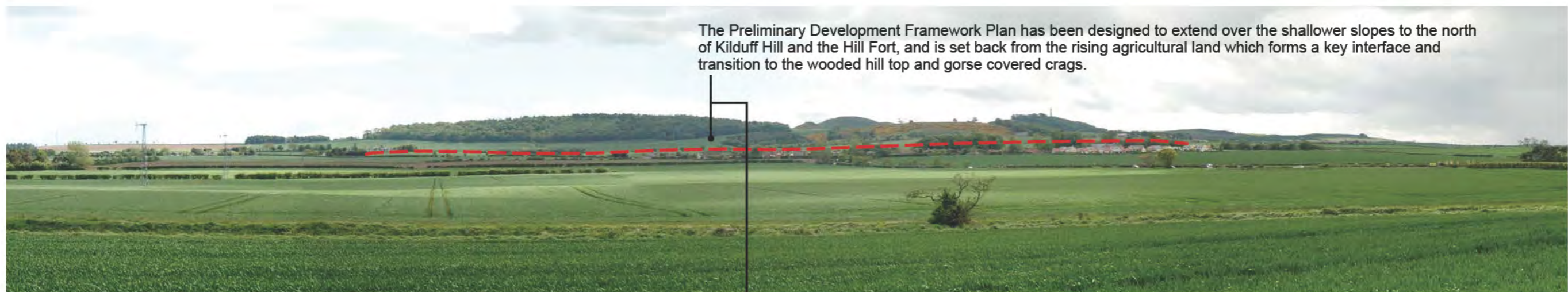
- ▶ Development compartments set back from the lower slopes of Kilduff Hill, with agricultural land retained between the development and the woodland and gorse covered crags to retain the sense of contrast between the habitat types.
- ▶ A large green wedge has been designed into the southern sector of the development to break up the urban form; extend the landscape into the development; allow direct access to the countryside from the extended village core; and, promote views across the SLA area and to the Hill Fort and Hopetoun Monument.
- ▶ New path links have been introduced across the southern edge of the development area to promote access to the countryside and complement the existing network of paths which extend over the high ground.




Landform and development context



The Preliminary Development Framework Plan has been designed to extend over the shallower slopes to the north of Kilduff Hill and the Hill Fort, and is set back from the rising agricultural land which forms a key interface and transition to the wooded hill top and gorse covered crags.



Effect of development on views towards Kilduff Hill and the Garleton Hills

 Approximate southern extent of development proposals



Notes

- ① NEW PATH LINKS INTO SLA LANDSCAPE PROMOTING INCREASED ACCESS TO THE COUNTRYSIDE
- ② GREEN WEDGE WITHIN SOUTHERN EDGE OF THE NEW DEVELOPMENT TO EXTEND COUNTRYSIDE INTO THE HEART OF THE SETTLEMENT AND PROMOTE VIEWS TO THE HIGH POINTS TO THE SOUTH
- ③ DEVELOPMENT SET BACK FROM HIGH GROUND, WITH AGRICULTURAL LAND RETAINED BETWEEN THE NEW DEVELOPMENT AND THE WOODED SLOPES SO THE IMPORTANT TRANSITION BETWEEN HABITATS REMAINS VISIBLE IN VIEWS FROM THE NORTH
- ④ NEW TREE BELTS AND PLANTING INTRODUCED TO FRAME DEVELOPMENT COMPARTMENTS; CONTAIN VIEWS BETWEEN DEVELOPED AREAS AND THE COUNTRYSIDE; AND, PROVIDE A SETTING TO THE NEW DEVELOPMENT

Preliminary Development Framework Plan Garleton Hills SLA Context

Date: November 2016 Scale: 1:10,000

Transport & Access

The development creates the opportunity to provide western and southern bypasses of the historic village which will also act as the main points of access to the new residential areas and resolve identified existing deficiencies in the local road network at this point (and potentially elsewhere, subject to Transport Assessment). Within the development areas, a network of streets would be created in line with 'Designing Streets' to provide a fully permeable site, and walkable neighbourhoods.

The site will incorporate an extensive network of footways, footpaths and shared surfaces and will connect with existing pedestrian / cycle facilities including Core Path 300 (Gullane to Drem) so providing for the movement of pedestrians and cyclists within and to / from the development by non-car modes of transport.

The proposals include the provision of an accessible crossing of the railway line to fully integrate the two parts of the expanded settlement with each other the train station (including proposed car parking) and the existing historic village.

The development is centred around Drem station on the North Berwick line which provides an hourly service (more frequent at peak times) to and from Edinburgh.

Bus services to Drem currently run approximately every 90 minutes in each direction. The expansion of the village may support the increased frequency of the service, providing a benefit to existing and future users.

The development includes the opportunity to provide significant additional parking for the railway station and so help facilitate the Council's aspiration to increase capacity on the Edinburgh to North Berwick line.

Drainage

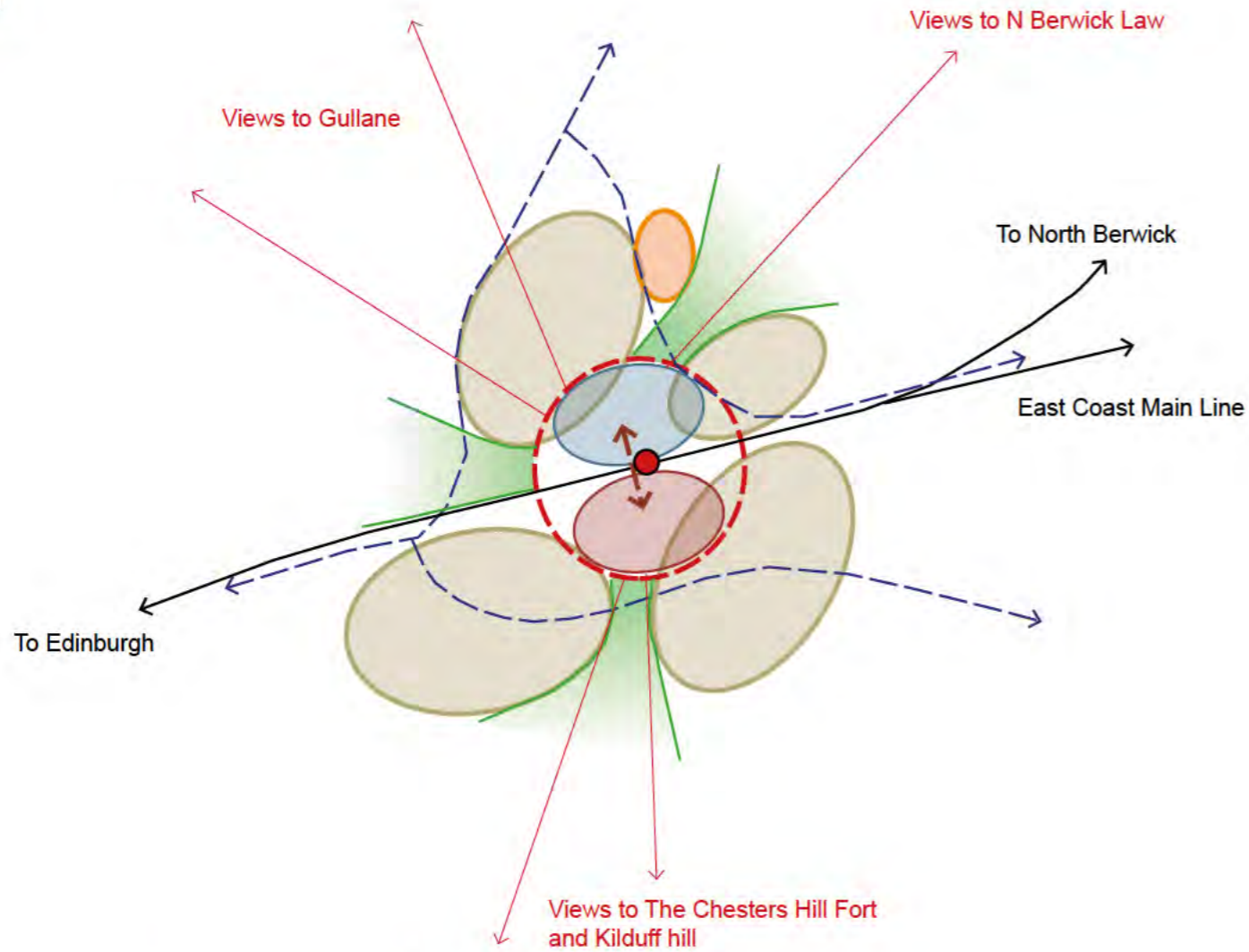
A Preliminary Drainage Strategy has been prepared in June 2015 (full Report submitted separately) for the proposed site which concludes that;

Surface Water Drainage – Will be a gravity system, with attenuation (likely expansion of existing SUDs adjacent to railway station) on site, with two levels of treatment prior to discharge via the existing Network Rail culvert under the railway. This would be independent of the adjacent development north of the railway.

Foul Drainage – As there are no existing foul sewers in the locality (existing properties utilise treatment plants) there is an opportunity to improve this situation and provide a new mains system for adoption by Scottish Water (further discussions required). Development south of the railway could either connect to a new system (either beneath the railway, or via a rising main) to a system provided on the development to the north, or by installing a new treatment plant south of the railway (subject to further assessment).

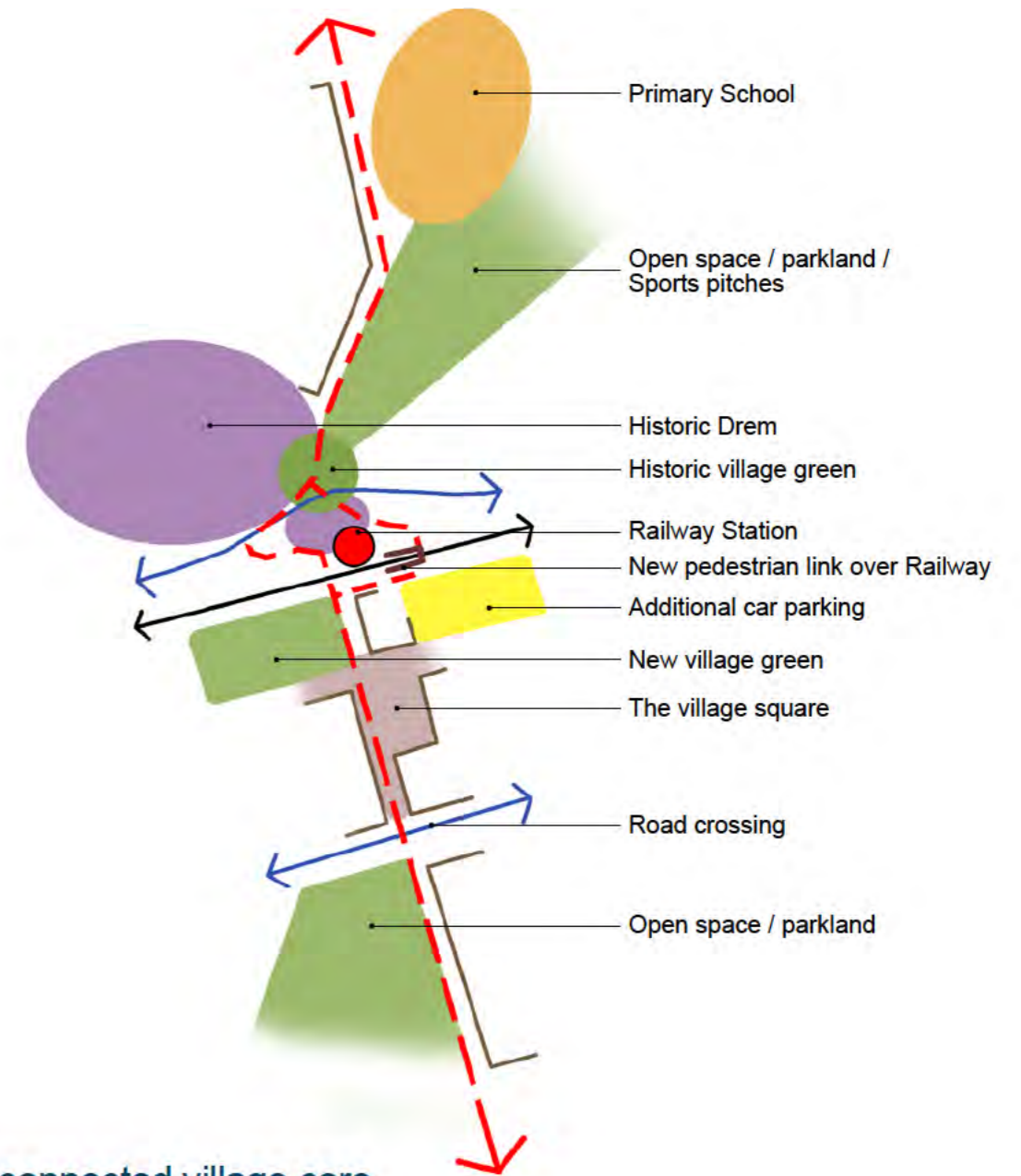
Ecology

An Ecological Walkover Survey undertaken in June 2015 (full Report submitted separately) concluded that very few of the hedges forming field boundaries would have any significant ecological value, with limited opportunity for birds to nest, with very few small birds seen during the survey. The use of land in the area by geese and swans has also been considered but none of the evidence held by various bodies show geese feeding in the area of search, particularly to the south of the railway (to be confirmed through more detailed surveys in due course). No evidence of Badgers, Otters, Bats, or Great Crested Newts was found during the inspection (to be confirmed through more detailed surveys in due course). No other species or habitats of any importance was recorded during the survey.



Development concept

- | | | | |
|--|-------------------------------|--|----------------------|
| | STATION | | DEVELOPMENT SECTORS |
| | RAILWAY LINE | | PRIMARY SCHOOL |
| | VILLAGE CORE | | ROADS |
| | HISTORIC DREM | | GREEN INFRASTRUCTURE |
| | NEW VILLAGE CENTRE FACILITIES | | KEY VIEWS |
| | CONNECTED VILLAGE CORE | | |



A connected village core

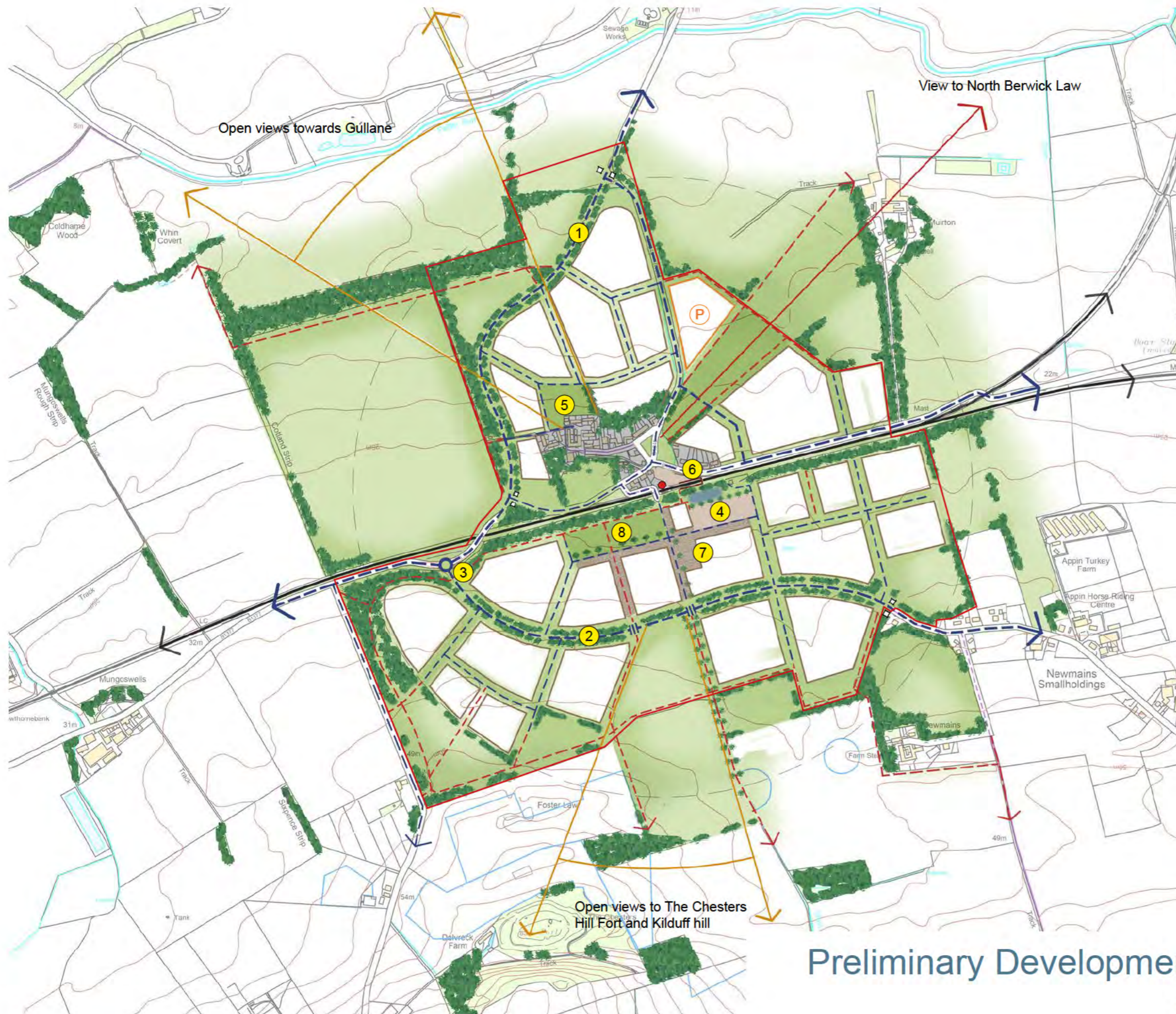
The village core will be connected by a continuous central route which will extend north / south forming a 'spine' through the village. This will offer direct access to all of the key elements of the expanded settlement, including the historic village, the new village square, the village green, the new village centre facilities, the railway station, the new primary school and areas of open space, parkland and sports pitches.






















Legend

Section

4



-  PROPOSED EXTENT OF LAND TO BE SAFEGUARDED WITHIN THE LDP
-  RAILWAY LINE
-  RAILWAY STATION
-  EXISTING BUILT FORM
-  ROADS
-  PATH NETWORK
-  TREES / WOODLAND
-  KEY VIEWS (PANORAMIC)
-  KEY VIEWS (POINT VIEW TOWARDS NORTH BERWICK LAW)
-  DEVELOPMENT SECTORS
-  VILLAGE CENTRE INC. SQUARE AND LOCAL FACILITIES
-  POTENTIAL LOCATION FOR PRIMARY SCHOOL / SPORTS PITCHES
-  GREEN CORRIDORS / OPEN SPACE / PARKLAND
-  SUDS FACILITY
-  GATEWAY FEATURES
-  1 NORTH WESTERN BYPASS
-  2 SOUTHERN BYPASS
-  3 NEW ROUNDABOUT JUNCTION
-  4 ADDITIONAL RAILWAY STATION CAR PARKING
-  5 GREEN SPACE / BUFFER TO EXISTING SETTLEMENT EDGE. THIS WILL ALSO RETAIN VISUAL CONNECTIVITY BETWEEN THE CHESTERS AND GULLANE TO THE NORTH
-  6 NEW PEDESTRIAN LINK OVER RAILWAY
-  7 VILLAGE SQUARE
-  8 NEW VILLAGE GREEN

A Vision for Drem Preliminary Development Framework Plan



JAMES MILLAR (KILDUFF) LTD

PROPOSED DEVELOPMENT AT
KILDUFF, DREM, EAST LOTHIAN

PRELIMINARY DRAINAGE STRATEGY

	NAME	SIGNED	DATED
PREPARED BY	Mark Malaczynski		
CHECKED BY	David Miller		

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1.0 INTRODUCTION

1.1 Scope

James Millar (Kilduff) Ltd. have appointed David R Murray and Associates to produce a Drainage Strategy document outlining potential solutions for draining their proposed residential development.

In order to produce this report we undertook a site walkover together with the client to view the existing drainage arrangements and topography of the site.

We were provided with documentation relating to the culvert upgrade works carried out by Carillion on behalf of Network Rail.

1.2 Proposed Cala Development

We understand that Cala homes are promoting a large development to the north and south of the railway line around the village of Drem as an organic growth extension of the village.

We were provided with Cala's Outline Strategic Growth Proposals document however this document does not contain any information on drainage. We have assumed that Cala's consultants will work closely with James Millar (Kilduff) Ltd. to produce a composite drainage strategy incorporating both developments and if necessary that Cala's drainage system will be designed to accommodate flows for this development as required.

2.0 SURFACE WATER

2.1 Existing Surface Water Drainage

There are no public surface water sewers within or close to the site however there are several land drains which have been installed to drain the fields within the site.

An un-named watercourse flows northwards through the site passing beneath the railway in a 2000 x 600 culvert to the east of the station. The watercourse continues northwards to the Peffer Burn.

Network Rail have recently carried out surface water drainage works in the area to alleviate flooding problems caused by partial collapse and silting up of an old 500 x 320 drain beneath the railway located adjacent to the road bridge at the station. The abovementioned 2000 x 600 culvert beneath the railway was constructed as part of these works along with an Attenuation Lagoon designed with 170cu.m capacity for the 50 year return period. There is no formal flow control on the Lagoon, the outflow is controlled by the design capacity of the culvert.

We understand that the now redundant 500 x 320 drain beneath the railway has been grouted in order to stabilise it and avoid further collapse compromising the railway above.

2.2 Draining the Proposed Development Site

Details of the proposed development, such as site area, number of units etc. are not known at this stage however we would suggest that the most likely surface water outfall from the site will be the new 2000 x 600 culvert beneath the railway. A topographical survey was not available at the time of writing however the site walkover would suggest that the existing topography all falls towards this point therefore gravity drainage of surface water will be achievable for the proposed development.

Any development in this area will require SUDS treatment and Attenuation. It is likely that the proposed development will be over 50 units therefore two levels of treatment will be required prior to discharge. We would suggest that the first level of treatment be provided at source with filter trenches, swales, porous paving etc. being accommodated within the development layout as required.

We would suggest that the second level, end of line, treatment plus attenuation to greenfield levels be provided in a basin or pond located close to the outfall culvert.

This could be achieved either by remodeling the existing lagoon to the size required for the development and specification for adoption by Scottish Water or by constructing a new SUDS facility adjacent to the existing to Scottish Water standards for adoption.

All surface water drainage will be required to be designed in accordance with Scottish Water's requirements as well as those of SEPA and the local authority.

This proposal would be independent of the proposed Cala Homes development although Cala would need to take cognizance of the flows in the watercourse if they proposed any alterations to its route.

3.0 FOUL WATER

3.1 Existing Foul Water Drainage

There are no public foul water sewers within or close to the site and it is understood that the existing properties in Drem utilise septic tanks.

3.2 Draining the Proposed Development Site

Due to the lack of existing foul infrastructure in the area it will be necessary to install new infrastructure to deal with the foul discharges from the site. Three options for dealing with foul drainage have been identified:

1. Install a new foul sewer beneath the railway line and northwards along the B1345 to connect into the new foul drainage network in the proposed Cala development.

This proposal would involve obtaining permission from Network Rail to install the new pipe beneath the railway line and in our experience this can be a very long and drawn out process.

This proposal will also require the drainage within the Cala development to be designed to accommodate this development and would also mean that development of this site would rely on delivery of the drainage within Calas development.

2. Construct a new foul pump station at the low point of the site with a rising main crossing over the railway via either the B1377 road bridge or the unnamed road bridge at the station. A new gravity sewer running northwards within the B1377 would then take the foul drainage to connect into the Cala development.

This proposal would involve obtaining permission from the bridge owner (likely to be Network Rail owning the structure with the local authority owning the road) to install the new rising main.

This proposal will also require the drainage within the Cala development to be designed to accommodate this development and would also mean that development of this site would rely on delivery of the drainage within Calas development.

3. Install a new private treatment plant on the southern side of the railway discharging into the existing watercourse.

This option has the advantage of not having to involve Network Rail and being independent of the Cala development however a discharge licence would have to be obtained from SEPA and the relatively minor nature of the watercourse may be an issue in terms of dilution of flows discharging from the

treatment plant. Scottish Water would not adopt a foul system which discharged through a private treatment plant therefore the foul system would have to remain private.

In addition if the proposed development is of a larger nature then the costs of a private treatment plant could be prohibitive.

Given the above it is likely that the pump station option is likely to be the most suitable solution provided that the crossing of one of the road bridges can be agreed with the relevant authorities.

APPENDIX A

EXISTING DRAINAGE

EXISTING DRAINAGE SCHEMATIC



APPENDIX B

PROPOSED SURFACE WATER OUTFALL

PROPOSED SURFACE WATER OUTFALL



APPENDIX C

PROPOSED FOUL WATER OUTFALL – OPTION 1

PROPOSED FOUL WATER OUTFALL - OPTION 1



APPENDIX D

PROPOSED FOUL WATER OUTFALL – OPTION 2

PROPOSED FOUL WATER OUTFALL - OPTION 2



APPENDIX E

PROPOSED FOUL WATER OUTFALL – OPTION 3

PROPOSED FOUL WATER OUTFALL - OPTION3



APPENDIX F

PHOTOGRAPHS



Photo 1: View of Attenuation Lagoon



Photo 2: Inlet to 2000 x 600 culvert beneath railway



Photo 3: Watercourse flowing northwards from culvert outlet

**Development area
at
Drem
East Lothian**

ECOLOGICAL WALKOVER SURVEY

June 2015

Carried out for
James Millar (Kilduff) Ltd
Kilduff
North Berwick
East Lothian
EH39 5BD

By
Alan F Leitch
Ecological Consultant
2 Burgess Terrace
Edinburgh
EH9 2BD
Tel 0131 667 1169
Alan.leitch1@virgin.net

INTRODUCTION

This survey concerns initial proposals to investigate the development of fields situated within a radius of 800metres of the railway station in the village of Drem in East Lothian as shown on the attached map (Grid Reference at centre NT 510793). As an initial assessment of the suitability of the site, an ecological walkover survey was required.

It should be emphasised here that this survey is only a first look at the site at a fairly general level, and is no substitute for a full Environmental Assessment. No absolute guarantee can be given that nothing of interest has been missed, and the surveyor can not be held responsible in any way if further more intensive survey turns up something of ecological importance. However, it is intended to give a good general overview of the site, and should indicate the likely occurrence of anything of importance, or the need for further survey.

Of importance are habitats and species protected under European law under the “Birds” and “Habitats” Directives and translated into UK legislation under various regulations. There is also protection under domestic legislation, namely the Wildlife and Countryside Act 1981 as amended by the Nature Conservation (Scotland) Act 2004

Alan Leitch was commissioned to carry out the survey. He has over 15 years experience with Scottish Natural Heritage as an Area Officer assessing planning applications, and has worked independently as an ecological consultant since 2006. He has a degree in zoology, and over 40 years experience of ecological survey for a wide variety of species.

METHODOLOGY

The survey was carried out on the 12th June 2015. This involved carrying out an ecological survey of the site, assessing the habitat at Phase 1 level (Handbook for Phase 1 Habitat Survey, Nature Conservancy Council, 1990), and looking for any species of interest. A check was also made of any historical records of note and any designated sites.

RESULTS

As access permission was only available for part of the site, the original intention was to survey that part of the site on foot, and the rest from roads. However, it soon became apparent that there was little point in walking through acres of agricultural crops, and that all necessary information could be gained by viewing from the road network through and round the area.

Habitat

Virtually all of the proposed development lies on intensively farmed arable fields, mostly grain crops, with some potatoes and peas. Field boundaries are largely hawthorn hedges, with some post and wire, particularly beside the railway. The hedges tend to be in fairly good condition, but are well pruned, and not very wide.

Although some of the hedges have other species interspersed, none have the species diversity which would indicate any great age and importance. Consequently none of the hedges have any significant ecological value, with limited opportunity for birds to nest.

There were one or two places where the field boundaries are wider than normal with a number of young trees and shrubs. However, none of these areas had any particular ecological significance.

A small piece of woodland occurs at the northern extent of the surveyed area. This could not be accessed. However, its small size, combined with the surrounding intensive agriculture makes any great ecological importance very unlikely. There appeared to be a game crop planted just to the east of the wood, and straw bales placed round the wood, presumably as shelter. All the indications are that the wood may be used for game rearing, again limiting any ecological significance.

Song Birds

As expected of such an intensively farmed area very few small birds were seen. A skylark was heard singing, swallows and house martins were seen feeding over one of the fields, and a few common species such as blackbird and house sparrow were seen associated with the village.

Geese and Whooper Swans

Although a physical walkover survey at this time of year has no relevance to these birds which only appear in winter, the area is known to support geese and whooper swans. Consequently, the local authority biodiversity officer was contacted for information on the East Lothian Council policy in relation to these species, and for any records.

Drem is well within the area identified by the Council as a pink-footed goose feeding area. None of the records held by the Council show geese actually feeding in any of the fields in the area of search covered by the current walkover survey. However, there are a number of records in fields adjacent to Muirton Farm on the north eastern boundary of the survey area. Local birdwatchers state that both geese and swans have been seen all round Muirton Farm, which puts them within the survey area. In addition there is one Council record of geese using fields to the west of Drem village, but outside the survey area, and local birdwatcher information from last winter recorded sightings of birds in the large field west of Drem, just north of the railway and within the survey area.

Badgers

No evidence of badgers was seen during the survey, and there are no records of any setts within the survey area. The agricultural coastal plain of East Lothian, devoted mainly to grain production, does not provide particularly good feeding habitat for badgers. However, since more and more records of setts have been found here in recent years, it is not impossible that further more intensive survey might uncover the odd sett.

Otters

No evidence of otters was noted during the survey. However, as they are known to use virtually every watercourse in the Lothians, they are bound to occur on the Peffer Burn to the north but outwith the survey area.

Bats

There are no old trees within the survey area likely to be suitable as bat roost sites, except perhaps for trees in the woodland to the north. It is also known from the literature and personal experience from surveys in similar areas, that intensive arable fields do not provide very good foraging for bats, and very few are likely to use the area.

Great-crested Newt

There are no water bodies suitable for breeding in the survey area, nor is intensively cultivated arable ground likely to be a suitable habitat at other times of the year. The National Biodiversity Network website does not have any records within 2Km of the survey area.

CONCLUSIONS

The survey area is comprised almost entirely of intensively cropped agricultural ground with very little in the way of any features of semi-natural character. However, some of the fields within the survey area are likely to be used at some time by pink-footed geese and whooper swans. The most heavily used fields appear to be the low lying fields round Muirton Farm to the north east of the survey area. However, some of the fields to the east of Drem, adjacent to the railway are also recorded as being used. The issue of geese in particular, but also swans, is of major importance in the determination of any planning applications as detailed in Recommendations below.

No other species or habitats of any importance were recorded during this survey.

RECOMMENDATIONS

East Lothian Council has carried out a study of the use of the Council area by geese. This was largely in relation to wind farm developments, but is also very relevant to any other development proposals. The following extracts from a modified policy document issued by the Biodiversity Officer are of relevance:-

Most of the East Lothian coast from Musselburgh to Dunbar is designated as part of the Firth of Forth Special Protection Area, one of the European Union Natura 2000 sites. [Turbine] developments have the potential to affect the SPA, or its specific bird interests, particularly pink-footed geese. The Council must carry out a Habitats Regulations Assessment (HRA)¹

¹ *Habitats Regulations Assessment (HRA)¹ are an EU requirement under the Conservation (Natural Habitats, &c.) Regulations (1994) (commonly referred to as the "Habitats Regulations").*

prior to determining all [turbine] applications, to assess whether the development will have a 'likely significant effect' on the SPA or its qualifying species.

.....

.....

The core feeding areas are based on our general understanding of geese behaviour. The map will be amended as our understanding of geese behaviour improves and the Council has organised bird surveys to help with this process. (Drem and the whole of the current survey area is well within a core feeding area)

Where a development is considered to have a likely significant effect an Appropriate Assessment must then be undertaken by the Council. This considers the impact of the proposal, in combination with other developments that may affect the same habitat or species, i.e. the cumulative impacts.

The assessment needs to be based on bird and habitat information for the application site and the applicant will need to commission suitable bird surveys of the proposal area. These should be conducted during the autumn goose migration (September to November) and the wintering season (October to March). (Note that no guidance is given on the level of survey required)

Planning consent can only be granted where it can be concluded that there will be no adverse impact on the SPA, or populations of pink-footed geese and other Natura species. The Council will not grant planning consent to applications where data are insufficient to make this conclusion. (Note again that the amount of data required is not specified)

What the above also does not exactly state, but can be inferred, is that any disruption of goose feeding areas, even outwith the SPA, will have an effect on the geese for which the SPA is notified, and consequently the SPA itself i.e. any effect on feeding geese can trigger European legislation well away from the SPA where they roost.

The above extract makes it clear that any application for development within the current survey area within 800Km of Drem station will require the applicant to commission surveys of the geese in the area during the migration season from September to November and during the wintering period from October to March. An acceptable level of survey e.g. weekly, fortnightly or monthly will need to be agreed with the Council/SNH. No information was available at the time of writing this report. However, the whole survey area is not likely to be uniformly attractive to geese. The most important area is round Muirton farm, and it is quite possible that some of the survey area, particularly to the south of the railway, is not such an attractive area to geese.

Alan F Leitch 25 June 2015

From:
To: [Local Development Plan](#)
Cc: [Policy & Projects](#) ; "
Subject: ELC Proposed LDP - Representation related to Tranent South - PROP TT1 Housing at Windygoul South, Tranent and PROP TT3 Employment at Windygoul South, Tranent on behalf of Messrs R and A Kennedy
Date: 03 November 2016 13:39:45
Attachments: [East Lothian LDP - Submission by R and A Kennedy - Tranent South - Windygoul 11-16.pdf](#)

Please find attached a representation on behalf of **Messrs R and A Kennedy**, Seggarsdean Farm, Haddington, EH41 4LD related to Tranent South - **PROP TT1** Housing at Windygoul South, Tranent and **PROP TT3** Employment at Windygoul South, Tranent. This representation comprises a statement outlining the changes sought to the Proposed LDP along with the reasoning for seeking changes.

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

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EAST LOTHIAN PROPOSED LOCAL DEVELOPMENT PLAN

REPRESENTATION ON BEHALF OF MESSRS R AND A KENNEDY

Changes to the Proposed Local Development Plan sought

In the event that development to the south of Tranent (the area covered by sites PROP TT1 Housing at Windygoul South, Tranent and PROP TT3 Employment at Windygoul South, Tranent) it supported through the LDP process, the proposed allocations should be combined into a single mixed use allocation. This approach would allow more detailed assessment of the range of issues impacting the development in this area and represents the only means by which the most appropriate land-use combination/relationships will be determined. The altered allocation should state: -

PROP TT1 Mixed use development at Windygoul South, Tranent. The existing wording of “PROP TT1 Housing at Windygoul South, Tranent” should be altered to add in the second line after the words “circa 550 homes”, the words “approximately 8.6 hectares of employment land,”. This combines the allocation into one and allows greater flexibility in order to deliver beneficial new mixed-use development.

Re-numbering of other allocations (with the combination of PROP TT1 and PROP TT3) would also be required.

SUPPORTING CASE

PROP TT1 Housing at Windygoul South, Tranent is presently noted as a “*mixed use, predominately residential development...*”, the allocation to include housing, primary school expansion, community uses, infrastructure and associated works. The site lies adjacent to the existing built up area on the north boundary (housing and primary school) albeit with a significant part of the southern boundary abutting existing industrial/employment land and an established agricultural operation/hub. A masterplan, based on the draft site development brief, is required in order to determine the final development composition/form. The allocation and the draft site development brief fail to address the relationship of potential development within the PROP TT1 site with adjacent land uses (including industrial/employment land on the south boundary) nor does this allocation deliver the required road link to the B6414 Elphinstone Road (which is a stated requirement for PROP TT3).

PROP TT3 is allocated for employment use albeit it directly abuts existing residential development to the north and potentially to the east over time. The draft development brief for this site (bullet point 5) recognises the potential conflict between the

respective land uses and seeks to address this with a 10 metre wide tree belt (which would have little, if any, acoustic benefit).

It is unclear what future impact the proposed residential development at Windygoul may have on the ability of existing employment uses (to the south) to operate/expand. Employment uses should have a reasonable expectation that their operations will not be adversely impacted/constrained by non-compatible development on neighbouring sites, otherwise the value of such areas to the local economy and future investment may be constrained. This is a negative economic outcome. Likewise, introducing new employment uses adjacent to established residential development has the potential for negative impacts on both uses/users. It is unclear what land use compatibility assessment has occurred (as it is not addressed in the draft development briefs for the sites) and it is certainly not in the interests of either the industrial/employment use or future residents to have such a close physical relationship.

It is also unclear, without a comprehensive assessment of development proposals for the Windygoul allocations as an entity, how the required link road to the B6414 would be delivered. In addition, is it appropriate to have a main access to a residential site through what would be, in effect, an industrial estate?

The most appropriate location within the site for new employment uses may well (is likely to) sit adjacent to the existing employment uses. A far more detailed assessment of the existing/proposed land use interactions and allocations is required rather than the somewhat arbitrary line drawn between PROP TT1 and PROP TT3 as presently being proposed.

With the alteration to the LDP being proposed in this representation there is the opportunity, within the land use composition/constraints contained in the present allocations, and following more detailed assessment of the relevant issues impacting the site and its development (rather than the somewhat superficial assessment set out in the Proposed LDP), to deliver a far more appropriate development composition maintaining and protecting existing and future land uses and ensuring the provision of the road linkage to the B6414. The single mixed-use allocation, as proposed, appears as far more relevant response to the delivery of the desired mixed-use development at south Tranent.

From:
To: [Local Development Plan](#)
Subject: Local Development Plan and Gullane
Date: 03 November 2016 13:40:50

To whom it may concern.

I wish to object to some of the proposed developments detailed in East Lothian Council's Development Plan. Gullane is a small village which cannot cope with being developed on such a huge scale, creating a 30% growth in the village is unreasonable. Developing the Fire College site, we are prepared to put up with but I object to adding the adding of the Saltcoats Field (NK7), Fenton Gait East (NK8) and Fenton Gait South (NK9) sites and wish them to be removed. If all 4 sites go ahead Gullane will contribute 50% of all the sites from the North Berwick coastal area. This is unbalanced and overestimates the ability of Gullane to absorb housing. The developments are not sustainable, having poor access to services and employment, the school and medical centre being impacted on a major scale.

I look forward to seeing changes to your development plan
Yours faithfully

Mrs Rachel Wallace

Submission 0207

3 November 2016

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

By e-mail only: ldp@eastlothian.gov.uk

Dear Sirs

**East Lothian Local Development Plan Review: Proposed Plan
Submitted amendment in respect of proposed housing site reference PROP TT13:
Lempockwells Road, Wester Pencaitland**

This submission by Gladman Developments Ltd., in conjunction with the landowners, is in support of the proposed allocation of the above site for housing development in the ELC LDP Proposed Plan.

In addition to this covering letter, we enclose a formal representation following the format of the consultation questionnaire, and documents relating to the consented in principle development (DPEA Planning Appeal reference PPA-210-2049), including the approved site masterplan.

The Proposed Plan states that the site is proposed to be allocated for around 115 homes, to reflect a recent consent at appeal. In fact the Council supported the allocation of the site in the Main Issues Report in 2014 for 120 units. The subsequent appeal against the refusal of planning consent by East Lothian Council, granted consent for an in principle development of up to 120 residential units in May 2015.

We seek an amendment to the Proposed Plan, in order to more accurately reflect the consented development of the site. It is suggested that, subject to the detailed design in respect of the AMSC application, it should be recognised that the site may be capable of accommodating additional unit numbers, in line with the Council's development density target of a minimum of 30 dwellings per hectare (net) (Policy DP3: Housing Density). The plan may wish to reflect an element of flexibility in this respect, to adhere to policy DP3, subject to infrastructure capacity.

Recognition of the exact number of consented units, and further flexibility regarding the potential for additional units would assist in meeting the recognised shortfall in the Housing Land Supply.

The site has recently been marketed and attracted much interest from the buoyant housebuilding market in East Lothian, and will soon be under contract with a view to commencement of development in early 2018, from which time the preferred bidders will be delivering early affordable and market homes to completion. It should be noted that discussion with the Council's Affordable Housing Officer has been undertaken to confirm the proposed mix of affordable homes.

Should you have any further queries, please do not hesitate to contact us.

Yours faithfully.

for Gladman Scotland
planningscotland@gladman.scot

Encl. Planning Consent: DPEA PPA-210-2049
Masterplan

Housing Proposal: Lempockwells Road, Wester Pencaitland

- 2.103 Land at Lempockwells Road, to the south of Wester Pencaitland, is allocated for around 115 homes to reflect a planning appeal decision. Site access to the local road network is possible. A Flood Risk Assessment is required. A suitable masterplan will be required to integrate development with the surrounding area, particularly on the eastern boundary.

PROP TT13: Lempockwells Road, Wester Pencaitland

Land at Lempockwells Road, Wester Pencaitland is allocated for circa 115 homes to reflect a planning appeal decision. Any new development proposals for the site must include a comprehensive masterplan for the entire allocated site that integrates development with the surroundings. A Flood Risk Assessment will be necessary. Any development here is subject to the mitigation of any development related impacts, including on a proportionate basis for any cumulative impacts with other proposals including on the transport network, on education and community facilities, and on air quality as appropriate.

Notice of Intention by Richard Hickman, a Reporter appointed by the Scottish Ministers

- Planning appeal reference: PPA-210-2049
- Site address: Lempockwells Road, Pencaitland, East Lothian
- Appeal by Gladman Developments Ltd against the decision by East Lothian Council
- Application for planning permission in principle 14/00732/PPM dated 2 September 2014 refused by notice dated 2 December 2014
- The development proposed: Residential development and associated works
- Application drawings : Site location plan and illustrative master plan
- Date of site visit by Reporter: 10 April 2015

Date of notice: 20 May 2015

Notice of Intention

For the reasons given below I am minded to allow the appeal and grant planning permission in principle subject to the conditions contained in the council's schedule, as modified to reflect the matters covered in paragraphs 72-75 and 78 below, following the signing and registering or recording of a planning obligation under section 75 of the Town and Country Planning (Scotland) Act 1997, or some suitable alternative arrangement, covering the matters listed in paragraph 78 below.

Description and background

1. The appeal site is a field of about 6.7ha adjoining the southern edge of Wester Pencaitland, bounded to the east by Lempockwells Road and to the west by the Pencaitland Railway Walk along the track of the former rail line. There is an open field boundary along the southern side. The site is in a slightly elevated position in relation to the houses to the north, with a short but steep bank sloping down to Bruce Grove. The illustrative master plan envisages the development of the site for up to 120 houses, taking access from Lempockwells Road, with structural planting and amenity space along the southern and eastern boundaries, play facilities, and a sustainable urban drainage attenuation pond at the northeastern corner. There would be footpath links to the railway walk and north to Bruce Grove.

2. Planning permission was refused because the proposal would be contrary to part 5 of the Council's Housing Land Supply: Interim Planning Guidance as the southern boundary of the site is not contained within a robust defensible boundary, and as such the development would set a precedent for subsequent future expansion to the south, the principle of which should be considered through the local development plan process.

3. The council has accepted that there is a shortfall in the 5 year supply of effective housing land, and has considered this proposal on the basis of the South East Scotland Strategic Development Plan 2013 (SESplan) policy 7, the East Lothian Local Plan 2008, and the Interim Planning Guidance on Housing Land Supply.
4. SPP (paragraph 33) requires that where the development plan is more than 5 years old, as is the case here in respect of the East Lothian Local Plan, the presumption in favour of development that contributes to sustainable development will be a significant material consideration.
5. The council's officer report on this application concluded, among other things, that the proposal would be contrary to local plan policy DC1, as it would be located in the designated countryside; but that it would be acceptable (subject to detailed design matters and various other requirements including a section 75 or other agreement) in relation to landscape character (local plan policy DP1); road access (local plan policies DP20, T1 and T2); flood risk and school capacity (local plan policy INF3); open space (local plan policy C1); play facilities (local plan policy C2); affordable housing (local plan policy H4); tree protection (local plan policy DP14); minimising loss of agricultural land (part of local plan policy DC1); artwork (local plan policy DP17); and former coal mining.
6. A total of 63 representations opposing the development were received by the council, one of them containing a petition of 17 signatures. The main matters of concern in these representations are the breach of the countryside policy; scale of development in relation to the size of the village; visual intrusion and loss of amenity to the setting of the village and the existing nearby houses; traffic access and road safety issues, including on Lempockwells Road and its junction with the A6093 in the centre of Wester Pencaitland, and for pedestrians using the bridge that links Wester and Easter Pencaitland; inadequacy of and pressure on local community services; poor accessibility by public transport; loss of prime agricultural land; drainage and flood risk; and prematurity in relation to the forthcoming local development plan that is in course of preparation.

Reasoning

7. Section 25 of the planning act requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. The proposal is contrary to the local plan policy to safeguard the countryside and prime agricultural land from unnecessary development. However SESplan, which has been approved since the adoption of the local plan, contains provisions to address recognised shortfalls in the supply of effective housing land. The council has adopted the Interim Planning Guidance on Housing Land Supply to address this matter.
8. Thus the determining issues in this appeal are whether the proposal would be in accordance with the provisions of SESplan (policy 7) relating to addressing shortfalls in the 5 year effective housing land supply, and with the relevant policies of the East Lothian Local Plan cited above; and, as material considerations, whether it would meet the requirements of SPP (paragraph 33) in relation to remedying shortfalls in the 5 year supply of effective housing land, and whether it would accord with the council's interim planning guidance on housing land supply. If this policy context points towards approval, it is also necessary to give consideration to any concerns raised in the representations opposing the proposal not

already covered in these matters, and whether they would outweigh these policy provisions, to the extent that refusal of the application would be justified.

Housing land supply : policy context

9. SESplan (policy 7) states that the constituent councils may approve new housing development on greenfield land outwith the identified strategic development areas in order to maintain a 5 year supply of effective housing land, provided that the development is (a) in keeping with the character of the settlement and the local area; (b) will not undermine green belt objectives; and (c) that any additional infrastructure that is needed is either committed or will be funded by the developer.

10. The council accepts that there is insufficient effective housing land allocated in East Lothian to meet the 5 year supply requirement derived from SESplan. There is a particular concern about the delivery of additional housing in the short term, up to 2019, due to slippage on some major existing sites, resulting in an expected shortfall of around 1150 homes. It is likely to be 2017 before any house completions can be anticipated from sites allocated in an approved new local development plan. Appropriate smaller and deliverable sites that can start and complete quickly, preferably well before 2019, could support the housing land supply during this intervening period.

11. The council's Interim Guidance on Housing Land Supply (December 2014) addresses this issue, and the requirement of policy 7 of SESplan, by supporting development on greenfield sites where various criteria would be met. This is not formal supplementary guidance forming a component of the development plan, having the status afforded by section 25 of the act, but informal guidance adopted by the council that is potentially relevant as a material consideration (see paragraphs 42-66 below).

12. Many of the representations opposing the proposal raise concerns that are components of criteria (a) and (c) of SESplan Policy 7, including the scale of the development in relation to the character of Pencaitland; the impact on the countryside setting of the settlement; pressure on local infrastructure (notably roads and pedestrian safety); and compatibility with the adjoining residential uses. The same matters, and others, are also covered in the council's interim guidance on housing land supply.

13. The grounds of appeal statement contains the appellant's submissions on these and other matters.

SESplan policy 7

14. I note that the formal development plan criteria for assessing this proposal in the context of the shortfall in the 5 year supply of effective housing land are items (a) (b) and (c) of SESplan policy 7, summarised at paragraph 9 above.

15. Looking first at whether the proposal would be in keeping with the scale and character of the settlement and the local area, this is a recurring theme in the letters of representation where there is a great deal of concern about the loss of character of the village due to enlargement, and the consequential changes in the size of the primary school.

16. I note from the officer's report that Pencaitland has just under 600 residential properties, so that 120 new houses would represent an increase of just under 20% in a single development. I agree with the council officer that this would be a "relatively substantial addition to the settlement". I also note that the grounds of appeal address this matter primarily in terms of the visual integration and compatibility of the new development in the landscape setting of the village.

17. I agree with the local representations that Pencaitland is a village with a rural character along the main street, due to the long established period buildings, walls, and green spaces, and the division between Easter and Wester Pencaitland formed by the green corridor of the Tyne Water. However more substantial housing areas are located away from the main street, with the scale of development partly hidden from view.

18. In terms of visual impact and landscape integration, I note that although the appeal site is in a relatively elevated position, it is reasonably well enclosed by a shelter belt along the east side of Lempockwells Road and by hedgerow trees along the railway walk to the west. The southern boundary is open, but somewhat concealed by the topography in both close and mid distance views. For these reasons, I agree with the assessments in the officer's report and the appellant's landscape analysis (explained on pages 21-23 of the visual impact report, relating to viewpoints 6, 7 and 8) that, with the generous landscape corridor along the eastern and southern periphery of the site shown on the illustrative master plan, the development would be sufficiently absorbed into its landscape setting and would not appear unduly prominent in the landscape in external views. Even if the development proposal was smaller, to be more in keeping with the overall scale of the settlement, I consider that there would be little difference in this visual impact and integration.

19. Although the corridor of green space and planting along the south side of the site will take some years to become visually effective, I agree with the appellant that it would provide a sufficient and robust edge to both the development and the village. Development of the appeal site would not oblige the council to approve further development on the land to the south. The layout of the roads and building plots within the appeal development could be devised to preclude any extension of the road system into the land to the south, if this was thought to be necessary.

20. The development site is located to the south of and at a slightly higher level than existing residential development at Lambert Court and Bruce Grove. Residents of these properties are understandably concerned about the prospective change of use of the field, leading to the risk of overlooking and loss of privacy, and the possible use of Bruce Grove as a vehicle access to serve the new houses. There is also concern about the increased risk of flooding, which is considered at paragraph 26 below.

21. The design and access matters are covered in the design statement that has been submitted in support of the application. The illustrative master plan shows a residential access road running along the northern perimeter of the site, above the grassy bank that slopes down to the existing houses. New houses would be located along the south side of this road. The cross section on pages 33-34 of the design statement shows the possible relationship of the existing and proposed houses in more detail. I consider that the degree of separation and setback, together with additional planting, would make it possible to devise a detailed layout and design that ensures that the new houses would not encroach

to any significant extent into views from the existing houses, avoiding any potential loss of privacy through overlooking, and any significant loss of sunshine through overshadowing. This might involve consideration of single storey houses in this part of the site.

22. With regard to the potential vehicle access to Bruce Grove shown on the master plan, I note that the street network to the north comprises fairly narrow residential access roads where the introduction of unnecessary through traffic would be very undesirable in terms of both road safety and residential amenity. There could also be gradient issues in forming an acceptable vehicular route down the slope to connect with Bruce Grove. Traffic from and to the new housing is clearly expected to use the new access proposed on Lempockwells Road. The design statement (page 24) makes reference to the potential vehicular connection to Bruce Grove, but the indicative master plan shows this only as a footpath link, and “potential vehicular access”. As already stated, I consider this aspiration to be unwelcome, and the details of the layout and landscaping could be designed to preclude this as a potential vehicular connection.

23. For these reasons, I conclude that the proposal would be in keeping with the character of the settlement in terms of overall scale and visual integration, and with the local area in that it could be designed to be compatible with the adjoining residential uses. Thus, while I can understand local concerns about the impact of the development on local facilities (see below), I agree that criterion (a) of SESplan policy 7 would be met.

24. Criterion (b) of policy 7 is not applicable as there is not a green belt in this location.

25. With regard to infrastructure implications (criterion c), the officer’s report concludes that school capacity issues can be addressed by means of financial contributions secured through a legal agreement.

26. The application is supported by a flood risk assessment and drainage strategy. The main conclusions of the study are that the site is not at risk of flooding, and that the higher/faster rain run-off can be accommodated by a sustainable urban drainage pond of an appropriate size located at the northeast corner of the site. This is the lowest part of the site from which there would be a controlled discharge to a watercourse. Such arrangements are now standard practice, where required. The council and SEPA are therefore satisfied that the development could be carried out without an unacceptable risk of flooding, provided that appropriate arrangements are made in accordance with a flood risk assessment.

27 The preferred arrangement for drainage would be through a connection to the existing sewer in Bruce Grove. The consultation reply from Scottish Water (a letter dated 25 March 2014 forming appendix 6 of the flood risk assessment and drainage strategy report) states that the Pencaitland waste water treatment works was at capacity but that additional capacity is part of the capital maintenance programme. Scottish Water is committed to assisting development in Scotland and has funding for the purpose, subject to various requirements.

28. A further report on utility services in support of the proposal (appellant’s document OC20 – July 2014) notes the Scottish Water position regarding the additional capacity for new developments, concluding that drainage capacity would be available for the proposed development. Detailed discussions with Scottish Water would follow once planning permission has been obtained. There are no issues between the site and the treatment

works, while surface water would be directed through the attenuation pond to a water course.

29. I conclude from this that satisfactory arrangements could be put in place to accommodate the higher rate of rain run-off from the site, and that there would be no increase in flood risk resulting from the development. The position regarding drainage is less certain, but I note that Scottish Water is committed to supporting new development through the upgrade of the treatment works, and that the financial aspects of this are a matter for further discussion if planning permission is granted.

30. The council's Roads Services staff have provided extensive advice on the design of the access on Lempockwells Road, the internal road and footpath layout, and on the implications for the wider road network. They are satisfied that the traffic generated by the new development could be satisfactorily accommodated on the local road network, but have concerns that the extra traffic on Tranent main street and the Dolphinstone junction on the A1 could have undesirable knock-on effects on existing peak hour problems.

31. The transport assessment lodged in support of the planning application shows that peak hour traffic from and to the site would be split roughly equally at the A6093 junction between the west (A68 and city bypass) and east (Haddington, Tranent, and Musselburgh). The additional traffic on any part of these routes is expected to be negligible, due to the dispersal of the trips.

32. There are significant local concerns about traffic congestion at busy times on Lempockwells Road on the approach to the A6093, due to the narrow width of the roadway and on street parking; and also concerns about road safety for pedestrians using the narrow footway on the A6093 when crossing the river bridge linking Wester and Easter Pencaitland.

33. The transport assessment acknowledges that traffic flows on the relevant section of Lempockwells Road are hindered by on street parking. It states that there is no recognised method for assessing the extent to which on street car parking affects the carrying capacity of a road link. However the survey of existing peak hour traffic levels and predictions of the additional traffic that would be generated by the development result in low flows that would be well within the normal carrying capacity of the road.

34. I take it from this that the delays to drivers caused by having to give way/wait for oncoming traffic to pass through the section of Lempockwells Road restricted by parked cars would remain, and would become more significant than at present. I can also understand the concerns about the potential hazard in using the single footpath to cross the river bridge, as it is very narrow, and the road appears to carry a good deal of heavy goods traffic. However I find that the development at appeal would not exacerbate these existing difficulties to an unacceptable extent.

35. My overall conclusions on the infrastructure implications of the proposal are that satisfactory arrangements can be made to provide the necessary additional school capacity and (subject to further discussions) drainage capacity, and for surface water drainage without any increased flood risk. No problems are expected in the delivery of other utilities. An acceptable access to the site can be formed on Lempockwells Road. I note the likely increase in traffic delays caused by existing parking on Lempockwells Road. However this

is a short section, and the council's roads staff are content to accept the position. Accordingly I conclude that there are no insuperable problems in providing the necessary infrastructure to serve the new development, so that criterion (c) of SESplan policy 7 would be met.

36. In summary, I am satisfied that the proposal at appeal would form an appropriate and acceptable extension of an existing designated settlement that would be in keeping with the scale and character of the settlement and the local area; that it would not undermine green belt objectives; and that there are no insurmountable infrastructure requirements. It would thus meet the criteria for release set out in SESplan policy 7, justifying an exception to local plan policy DC1 (development in the countryside).

East Lothian Local Plan (2008)

37. The assessment of the proposal in relation to SESplan policy 7 has involved the consideration of a number of factors covered by local plan policies. For the reasons explained above, I am satisfied that the proposal would meet the requirements of the local plan policies relating to minimising the loss of agricultural land (part of policy DC1); landscape character (policy DP1); road, pedestrian and cycle access (policies DP20, T1 and T2); flood risk and school capacity (policy INF3); open space (policy C1); play facilities (policy C2); affordable housing (policy H4); and safeguarding trees (policy DP14). Local plan policy DP17 requires provision for art works where development would have a significant impact on the local environment, to be achieved by means of a planning condition.

38. On this basis, I find that the proposal would result in a breach of local plan policy DC1, as it would involve development of agricultural land within the designated countryside; but that it would be in accordance with the other local plan policies listed above provided that the various detailed design and infrastructure matters covered in the submissions are properly secured.

39. Taken overall, I conclude that, with the exception of local plan policy DC1, this proposal complies with the development plan. It therefore remains for me to consider whether there are any other material considerations that would warrant the refusal of planning permission.

Material considerations

40. Scottish Planning Policy (paragraph 125) states that where a shortfall in the 5-year effective housing land supply emerges (as is the case in East Lothian), then (in paragraph 33 of SPP) the presumption in favour of sustainable development will be a significant material consideration.

41. For the reasons already discussed above, I am satisfied that this would be a sustainable development, well located as an acceptable extension of a well established settlement, and unlikely to give rise to significant adverse effects provided that the development adheres to the extensive detail that has been covered in the various supporting studies. I therefore conclude that the presumption contained in paragraph 33 of Scottish Planning Policy applies, and gives support to this proposal.

42. The council's interim planning guidance on housing land supply (2014) is intended to guide decisions on possible additions to make good the shortfall in the 5 year housing land supply. The council considers the interim guidance, which features extensively in the officer committee report, to be a material consideration in the assessment of the application, to be given such weight as is justified by the circumstances.

43. The appellant challenges the status of the interim guidance, on the basis that it is not formal supplementary guidance forming part of the development plan. In particular, the appellant criticises the apparent intention stated in the last sentence of the second paragraph of the appendix that the weight to be given to development plan policies will depend on compliance with the criteria in the guidance.

44. The statement lodged in support of the application considers the interim planning guidance in sections 5.4-5.5 of the document.

45. The interim guidance, being non-statutory, does not form a component of the development plan, and thus does not benefit from the obligation imposed by section 25 of the act. I also agree that the tests set out in the appendix to the guidance cannot change the weight to be given to the development plan (which is enshrined in section 25), as is stated in the last sentence of the second paragraph of the appendix. However I accept that the interim guidance is a potentially relevant material consideration where there would be a departure from the development plan, as is the case here.

46. The criteria set out in the appendix to the guidance comprise some items that replicate or correspond to policies that are already contained in the development plan. These are sections 2, 5(i), 5(ii) and 5(iv) which embrace the requirements of SESplan policy 7 and elements of local plan policies INF3, DP1 and T1.

47. There are other items in the appendix that do not appear to be covered by existing development plan policies, and which are arguably potentially relevant to the consideration of significant housing proposals intended to make up the shortfall in supply that are in new locations outwith the strategic development areas identified in SESplan, and outwith existing designated settlements.

48. These other items of potential relevance are :

- Site effectiveness and timing, which is an important consideration in determining whether early release of a site would be likely to deliver homes in the near future, which is the purpose of SESplan policy 7.
- Development plan strategy, where there is a potential need to ensure that early releases do not prejudice the delivery of sites coming forward through the development plan.
- Access to facilities and services within the relevant settlement (item 5(ii)b), so that the need to travel is minimised, to assess the sustainability of a site which is a significant material consideration as specified in paragraph 33 of SPP.
- Robust defensible boundaries (item 5v).

49. It is this last objective which forms the basis of the council's refusal of this application.

50. Looking at these items in sequence, the first criterion is effectiveness, to ensure that the release of a site would serve the intended purpose of augmenting the 5 year supply of effective housing land. The planning statement provides evidence of interest in the site from 3 established Scottish housebuilders. Based on past experience (set out in appendix 3 of the statement) it is expected that development of the site would start in 2016 and be completed in about 3-4 years. It is contended that the site meets the 6 criteria for effectiveness set out in the Scottish Government Planning Advice Note 2/2010. On this basis, the council's committee report concludes that the site can be considered to be effective.

51. The second criterion is scale. This matter has already been considered in paragraphs 15-18 above, where I have concluded that although this would be a fairly substantial extension to the village, it would blend in in an acceptable manner.

52. The third criterion relates to timing, and is intended to reinforce the expectation that approval of a site will lead to early completions. I agree that the information supplied to demonstrate site effectiveness (see above) provides a reasonable expectation of early development, again a position accepted in the committee report.

53. The fourth criterion is the development plan strategy, where the interim guidance sets out 3 examples intended to avoid situations where the approval of a new housing site could undermine the prospects for developing sites already approved or emerging through the local development plan process.

54. The planning statement in support of the application states that the only allocated local plan housing site in Pencaitland remains undeveloped since 2008, and is in council ownership; and that the appeal site is the only candidate site in Pencaitland put forward for development as part of the ongoing local development plan process. The council's committee report accepts that the appeal proposal would have no repercussions for the development plan strategy in relation to Pencaitland.

55. The final criterion covers locational considerations. These apply to proposals that form an appropriate extension to an existing settlement. As already noted, there is an overlap between these criteria and those in SESplan policy 7 which have already been considered.

56. With regard to the 3 further criteria listed at paragraph 5(ii) of the interim guidance appendix, I accept the submissions in the access and planning statements that the settlement is reasonably well served by public transport. There is a limited bus service on Lempockwells Road adjacent to the site, passing through Easter Pencaitland to Haddington and Tranent, and a more frequent service to Tranent and Edinburgh on the main road (A6093), approximately 600m to the north of the site.

57. The supporting statement on sustainability notes the facilities and services available in the village, including the primary school, small shop, church, village hall and community hall, bowling club, pub, and petrol station. The committee report describes these as "relatively limited", noting that travel to other settlements is necessary to reach secondary schools, medical and dental facilities, library, and a greater range of shops and recreation facilities. The site would form a direct extension of the village, with most of these local facilities available within 800-1000m.

58. I agree that this constitutes a reasonable range of local facilities. I consider it both impractical and probably undesirable for all significant new housing developments to be in settlements where there is a secondary school and a bigger range of services and community facilities. On this basis, I accept that existing facilities and services are available, and that the objective of minimising the need to travel would be achieved.

59. The final criterion of paragraph 5(ii) of the interim guidance is that the extent to which the additional housing would help make a demonstrable and necessary contribution to sustaining or improving educational, social or community facility provision within the local area may also be a material consideration.

60. Pencaitland Community Council does not oppose the proposal but wishes to ensure that the development makes a suitable contribution to much needed recreational facilities within the village.

61. The developer has offered to make financial contributions towards expanded primary and secondary school capacity and play facilities, and to provide 25% of the development as affordable housing.

62. Government policy on planning contributions and obligations restricts such contributions to those arising directly from the repercussions of the new development that is under consideration. Remedying existing off-site problems does not come within the scope of such planning contributions. I am satisfied that the arrangements that have been the subject of discussions between the appellant and the council, and which are covered in a draft undertaking that has been submitted, would adequately cover the matters where the development would result in increased use of community facilities. I consider that this would meet the third criterion in paragraph 5(ii), which is any event discretionary rather than obligatory.

63. In addition, the sustainability report that the applicant has provided includes an assessment of the contribution that the proposal would make to the Pencaitland community. This includes provision for additional households in the village, of which 25% would benefit from affordable housing; increased trade for local businesses and the prospect of improved or new businesses setting up; and increased support for community services and bus services, assisting their retention.

64. While there may be a downside in terms of some unwelcome pressures that may be difficult to remedy, I agree with the appellant that the overall impact of the residents of the new houses on the vitality of the community is likely to be positive.

65. The requirements of paragraphs 5(iv) and 5(v) of the interim guidance on housing land supply, relating to compatibility with adjoining uses, effect on possible new land allocations, and the need for robust defensible boundaries that must not set a precedent for subsequent future expansion, have been addressed at paragraphs 20-22, 53-54, and 18-19 above.

66. Drawing these various aspects together, I am satisfied that the interim guidance provides potentially relevant criteria for the selection of additional housing sites where additions to the effective supply are required, and that these criteria are well met by the proposal at appeal.

67. The main matters of concern in the representations opposing this development are noted in paragraph 6 above. All of them have been covered in the preceding discussion, except the explicit point on prematurity in relation to the forthcoming new local development plan. This has been touched upon under the consideration of the development plan strategy (paragraphs 53-54 above).

68. Scottish Planning Policy (paragraph 34) advises that where a plan is under review (as is the case here) it may be appropriate in some circumstances to consider whether granting planning permission would prejudice the emerging plan. This is only likely to apply where the development proposed is so substantial or its cumulative effect would be so significant that to grant planning permission would undermine the plan-making process by predetermining decisions about the scale and location of new developments that are central to the emerging plan. For the reasons given in paragraph 54 above, I consider that is not the case here, as no other candidate sites have been put forward for development in Pencaitland.

Synthesis

69. Drawing these matters together, I find that :

- The council has concluded that East Lothian does not have a 5 year supply of effective housing land, triggering the back up arrangements set out in paragraph 33 of Scottish Planning Policy and policy 7 of SESplan for augmenting the housing land supply.
- The council has adopted informal (non-statutory) interim guidance to assist in the selection of additional housing sites for this purpose.
- The site meets the criteria for early release set out in Scottish Planning Policy, SESplan policy 7, and the interim guidance.
- Although the southern boundary of the site does not at present form a robust and defensible limit to development, the site layout and landscape proposals shown in the illustrative master plan would provide adequate physical and visual containment within a few years, and would not set a precedent for further development in this direction.
- If developed on the lines indicated in the supporting documents and the illustrative master plan, and subject to the undertakings to make various contributions to policy objectives, the proposal would be in compliance with SESplan policy 7 and all but one of the relevant local plan policies.
- The representations raise concerns that have been adequately covered in the documents lodged in support of the application and in the committee report.
- Although the proposal would be in breach of policy DC1 and would take up agricultural land, release of the site for early housing development is a sufficient material consideration to justify this departure from the local plan policy.

70. Taking account of all of these matters, I conclude that, on balance, development of the appeal site on the lines indicated would form a satisfactory extension of the village that would be capable of augmenting the effective housing land supply in the short term without undue adverse effects; that the proposal would comply with most of the relevant local plan policies; and that an exception to the breach of local plan policy DC1 is justified by the requirements of SPP and SESplan policy 7, further supported by compliance with the

criteria set out in the council's interim guidance on augmenting the effective housing land supply. I recognise the concerns of local residents and the loss of agricultural land, but I find that these matters do not outweigh the overall acceptability and desirability of the proposed development.

Implementation

71. The council has provided a set of 11 proposed planning conditions to regulate the detailed design of the development.

72. The appellant has considered these proposed conditions in the response to the council's planning appeal statement. Some correction of the numbering is needed. The appellant suggests a re-wording of proposed condition 7 (relating to the relocation of the 30mph limit) as it requires a traffic regulation order. Condition 10 (a requirement for artwork) is criticised as being too vague, and clarification is requested.

73. I have reviewed these conditions and find them generally appropriate and acceptable. In addition, the detailed design should take account of the design matters discussed in this notice, notably in relation to the location of new houses in the vicinity of Bruce Avenue and the restriction of the connection to Bruce Avenue to preclude vehicular use.

74. I have reservations about proposed condition 7 (street lighting and extension of 30mph restriction on Lempockwells Road) and condition 8 (incorrectly numbered 6 – extension of footpath and dropped kerbs at Lamberton Court and Huntlaw Road on Lempockwells Road), as these would involve off-site works within the highway. These are all matters that are the responsibility of the highway authority, and outwith the appellant's control.

75. I agree that a pedestrian footpath linking the appeal site to the existing roadside footpath at Lamberton Court for walking from the appeal site to other parts of the village is an essential requirement. The illustrative master plan shows a footpath within the green corridor on the southeastern and eastern boundaries of the site, passing through the (off-site) play area at Lamberton Court, and thence on to meet Lempockwells Road.

76. This appears to be a potentially attractive arrangement, but residents of Lamberton Court have concerns about a potential loss of privacy that might result. While I think this could be avoided by careful location of the footpath, the connection from the play area to the road does not exist at present, and may not be welcomed. It would therefore be necessary to seek the agreement of the owner of the play area land, which appears to be the council, and with the highway authority, and to make provision for a footpath alongside the road from that point northwards to Lamberton Court. If such an arrangement is not possible, then the footpath would have to run alongside Lempockwells Road northwards from the site access point, as required by the condition as presently worded.

77. I am confident that an acceptable arrangement can be reached between the developer and the council to make provision for the necessary footpath by one means or the other, including the full cost of the footpath, as it is an essential element of the appeal proposal. This would probably require to be included within the terms of the proposed legal

agreement or undertaking (see below) to make provision for a financial contribution to the highway authority to implement these requirements.

78. The appellant has supplied the draft of a proposed unilateral planning obligation to provide for the financial contributions that the council is seeking. The council wishes these contributions to be secured through a legal agreement under section 75 of the Act, or by some other legal agreement designed to achieve the same purposes. Those purposes are the financial contributions to play facilities and additional accommodation at Pencaitland Primary School and Ross High School, and the 25% allocation of affordable housing units at the site, or some acceptable alternative arrangement. In addition, I suggest that the agreement or undertaking should include financial provisions for the footpath connection discussed in the preceding paragraphs, and the relocation of the 30mph limit. The effect of this would require some redrafting of proposed conditions 7 and (renumbered) 8. Clarification of proposed condition 10 would be helpful.

79. I therefore conclude that a planning obligation should be completed in order to achieve these objectives. I will accordingly defer determination of this appeal for a period of 12 weeks to enable the relevant planning obligation (either an agreement with the planning authority under section 75 of the Town and Country Planning (Scotland) Act 1997, or a unilateral obligation by the appellant, or such other legal instrument as may be agreed by the parties) to be completed and registered or recorded, as the case may be. If, by the end of the 12 week period, a copy of the relevant obligation with evidence of registration or recording has not been submitted to this office, I would expect the matters to be covered by the proposed unilateral planning obligation, suitably amended.

Richard Hickman

R M HICKMAN
Reporter

Conditions

The conditions for the planning permission in principle would be those listed in the council's schedule, modified as necessary following discussion between the appellant and the council in relation to the matters covered in paragraphs 20-22 and 71-77 above.

**Land at Lempockwells Road,
Pencaitland**



Indicative Master Plan

OPEN





Site boundary

Date : 01.09.2014

**Project : Lempockwells Road,
Pencaitland**

**Drawing Title :
ILLUSTRATIVE MASTERPLAN**

Scale : 1:1250 @ A1





— Site boundary

Key aspects

1. Lempockwells Road
2. Broce Grove
3. Existing Pencaitland Railway Walk.
4. Access point determined by location of protected trees, which are to be retained.
5. Footpath link to Bruce Grove, with potential vehicular access.
6. Path connection through existing (enhanced) open space leading to village.
7. Enhanced play/ leisure provision
8. SUDs facility designed as part of open space and should be overlooked by adjacent properties.
9. Linear park should provide recreational opportunities and an attractive outlook for properties.
10. Amenity space for recreation and informal play, surrounded by more informal meadow grassland.
11. Potential new play area.
12. Structural planting helps to screen the development and creates a robust edge to the village.
13. Clear, safe and well defined path connections to Pencaitland Railway Walk.
14. A high quality public space should define the central junction, overlooked by surrounding properties.
15. The existing informal path link to the Pencaitland Railway Walk should be maintained and enhanced.
16. Path link should be well defined, high quality and attractive to pedestrians.
17. Existing structural planting and hedgerows to be maintained and enhanced by a 5-10m buffer strip.

Date : 01.09.2014

**Project : Lempockwells Road,
Pencaitland**

**Drawing Title :
ILLUSTRATIVE MASTERPLAN**

Scale : 1:1250 @ A1





From:
To: [Local Development Plan](#)
Cc: [Policy & Projects: "](#)
Subject: ELC Proposed LDP - Representation related to Tranent East on behalf of Messrs R and A Kennedy
Date: 03 November 2016 13:53:23
Attachments: [ELC LDP Tranent East - Field No 1 - Submission Text 11-16.pdf](#)
[Document 1 - Indicative Proposals - Tranent East.tif](#)

Please find attached a representation on behalf of **Messrs R and A Kennedy**, Seggarsdean Farm, Haddington, EH41 4LD related to Tranent East. This representation comprises a statement outlining the changes sought to the Proposed LDP along with the reasoning for seeking changes, and 2 related documents: -

Document 1 - Site Boundary with Sketch Masterplan

Document 2 - Reduced site with Sketch Masterplan.

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

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EAST LoTHIAN COUNCIL PROPOSED LOCAL DEVELOPMENT PLAN

REPRESENTATION ON BEHALF OF MESSRS R AND A KENNEDY

Changes to Local Development Plan sought:

- **PROP TT1 “*Housing at Windygoul South, Tranent*” should be deleted from the Proposed Local Development Plan; AND**
- **Land at Tranent East (refer Document 1) should be allocated for development of up to 550 residential units with associated uses (primary school site, community facilities/uses, public park/open space, and related infrastructure) OR**
- **Land at Tranent East (Refer Document 2) should be allocated for development of up to 200 residential units with associated uses (primary school site, community facilities/uses, public park/open space, and related infrastructure).**

SUPPORTING CASE

1.0 BACKGROUND

1.1 In order to comply with the requirements set out in NPF3, Scottish Planning Policy, and SESplan it is essential that the East Lothian Local Development Plan (LDP) provides for the delivery of sustainable development in accessible locations. Key to the delivery of the LDP development strategy will be promoting a range of new housing development throughout the area with the concentration of new development in the most accessible parts of the district. The Compact Growth Strategy set out in the LDP appears a reasoned response to the identified delivery needs by directing the majority of new development to sites in/around the main settlements within the west of the SESplan East Lothian Strategic Development Area (focussed on the A1 and East Coast Main Line), that closest to the origin of demand.

1.2 Blindwells appears as a key component of the emerging preferred strategy (as it has been over an extended period) but can only be relied on, no matter the scale of development supported at this location, for a small percentage of the new house completions required by SESplan in the LDP area during the plan period. The SESplan housing requirement for East Lothian equates with the need to identify land capable of delivering 10,050 homes in the period up to 2024, with an interim requirement of land capable of delivering 6,250 homes up to 2019 and thereafter, the residual requirement of 3800 units. A five year effective housing land supply is also to be maintained at all times. The Plan, as presently proposed, despite the terms of Table HOU2, will fail to meet all of these targets (refer representation from Homes for Scotland) and there

remains an underlying requirement for a pragmatic response to release additional effective sites in order to help meet the level/range of needs identified.

1.3 The focus of new housing allocations, in order to accord with Scottish Planning Policy and SESplan, are those which are capable of being delivered (or part thereof) within the LDP period. Allocations on land without the commitment of the landowner to release the land for development are largely pointless and add nothing to the delivery of the development strategy.

2.0 THE TRANENT CLUSTER

2.1 The Tranent Cluster is centred around Tranent, the second largest town in East Lothian with a population of circa 11,565 persons. The defined area includes Tranent and a range of other settlements including Macmerry, Ormiston, Elphinstone, and Pencaitland, among others. Tranent contains a range of commercial, educational and leisure facilities commensurate with its scale/function.

2.2 LDP paragraph 2.82 confirms that: -

“In this cluster Tranent and Macmerry are the main settlements ... and highly accessible part of the Strategic Development Area, including via public transport. Sites identified for development in this area by the Plan will deliver the compact spatial strategy. The settlements of Ormiston, Elphinstone, Pencaitland, New Winton, East and West Saltoun and Humbie are all outwith the SDA.”

2.3 In accordance with the SESplan SDA requirements it is therefore Tranent and Macmerry that should be the focus of new residential development in order to meet the SESplan targets with some smaller scale localised development in the non-SDA settlements to assist in the variety/choice of new sites. Despite the SESplan policy requirement to focus new development within the SDA, over 500 units in the Tranent Cluster (33% of the required allocation) are proposed to be allocated for settlements outwith the SDA and there is no assessment set out within the emerging LDP to justify this approach/position. Logically, with a clear strategic concentration on Tranent and Macmerry to meet the SESplan requirement, then the potential for development in these areas should be prioritised. The need for a generous land supply in order to assist housing delivery should also be factored into the level of allocations being made through the LDP.

3.0 FUTURE DEVELOPMENT IN TRANENT – APPROPRIATE LOCATION(S)?

3.1 The LDP promotes development for 1500 houses within the Tranent Cluster during the LDP period. In promoting this level of development, the LDP also recognises

constraints on further development in the town in the form of education capacity, air quality in the High Street (which is presently designated an Air Quality Management Area), and junction capacity on the adjacent A1 arterial road.

3.2 LDP PROP ED4 “*Tranent Cluster Education Proposals*” confirms proposals for a phased extension to Ross High and additional pre-school and primary provision at Windygoul Primary School (in order to serve the additional new homes being planned for within the catchment). Policy T26 supports a programme of transport improvements in Tranent Town Centre with PROP 27 promoting the management of traffic in the town centre via a one-way system in order to improve traffic flow and maintain air quality. It is unclear how practical/deliverable this one-way system would be (capacity/impact on existing roads and junctions), whether this will have negative impacts on the trading of High Street businesses, and if it would simply lead to additional trip lengths and therefore little, if any, tangible improvements in air quality. It may also lead to less sustainable travel patterns. The LDP also promotes (PROP T17) improvements at the A1 Bankton Junction as part of a wider upgrade to the trunk road network.

3.3 The potential for the release of land on the east side of Tranent for development has been promoted/considered throughout the LDP process. The site subject to this representation was considered at the MIR stage (site reference ALT T5) as a “*reasonable alternative*”. The site was promoted individually and as part of a larger development to the east of Tranent in conjunction with the site identified at the MIR stage as Tranent Mains (site reference ALT-T7), this also being considered as a “*reasonable alternative*”. A separate submission for the combined sites to the east of Tranent on behalf of the respective landowners (Messrs R and A Kennedy and Omnivale Limited) has been made to the Proposed LDP.

3.4 With respect to the Tranent East site (Document 1) this could provide land for circa 550 houses; a primary school site; a sports facility comprising 2 full size football pitches; a multi-purpose games area; children’s play facilities, structural landscaping and related infrastructure. The first phase of the development relates to an area of circa 32 acres to the south of the A199 Haddington Road, land defined on 2 sides by existing roads with built development to the west. The sketch masterplan (Document 2) contains: a range of housing, circa 200 units in total; a primary school site; a sports facility comprising 2 full size football pitches; a multi-purpose games area; children’s play facilities; and an access from Haddington Road linking through the site to Ormiston Road (thereby providing the missing link for a southern by-pass of Tranent town centre) and links to neighbouring residential areas; and landscape boundary treatment/settlement edge (25 metres deep) comprising a community woodland with public access/footpaths.

3.5 The potential exists to retain 6 to 8 acres of this site for a third Tranent Primary School adjacent to (including) the 2 full size football pitches. This would remove the

requirement to extend Windygoul Primary School and would also provide the potential to support further future residential development within the Tranent Cluster. In effect, this phase of the development would positively address the provision of new housing, reduce public open space shortages in the town, provide land for a third primary school, and provide a through link to the south from the A199 (thereby assisting local traffic movements, integration with the existing neighbourhoods, and removing some traffic from the High Street with related road safety and air quality improvements). While part of the larger area being proposed, this area could be allocated on its own and still deliver a number of the stated benefits, including a fully effective site for new homes in order to help meet identified community needs.

3.6 The second phase of the development represents a logical extension from phase 1 (Document 1). This is a circa 13 acre site to the north of the A199 Haddington Road with extensive public open space provision incorporated and an extension to the community woodland defining the settlement edge. This would accommodate approximately 100 houses.

3.7 The third phase extends phase 2 northwards. The area is approximately 30 acres in size and would provide further public open space and recreational provision at the core of the development, this comprising approximately 200-250 units. Along with phase 2, this would provide the potential to link to the land to the north being promoted by Omnivale Limited and thereafter to provide a direct link (was the neighbouring site developed) from the A199 to the A1(T) at the Bankton Junction.

3.8 The “Sketch Masterplan” is flexible but does demonstrate the nature of beneficial development that could be delivered on these sites. Where required, alterations to the indicative phasing could occur was this considered preferable to the delivery of infrastructure. The landowners are keen to explore the potential of these sites for residential use further with East Lothian Council, whether in whole or in part, in order to seek to deliver a form of beneficial development for Tranent. The need for any additional community facilities (education etc) would also form part of any future assessment and would shape, as required, the final form of the development proposal.

3.9 A fundamental benefit of the Tranent East development is the delivery of a road through the development linking from the A199 Haddington Road to the B6371 Ormiston Road to the south. This route would facilitate a significant number of local traffic movements without the need to pass through Tranent High Street and the designated Air Quality Management Area, and would, in conjunction with Waterloo Road/Castle Road linking to the B6414 Elphinstone Road, provide a southern by-pass for High Street, Tranent. The development of the site would also provide a key part of the eastern by-pass for Tranent town centre (in conjunction with the neighbouring site).

3.10 While the eastern development option would help to address current transport and air quality issues in Tranent, this is not the case for the proposed PROP TT1 allocation at Windygoul. This development would simply add to the additional traffic in

Tranent, including that passing Windygoul Primary School and through central Tranent, without providing any mitigation or other transport benefits to the town. The inability of the developer to link through to the B6414 Elphinstone Road would be likely to lead to additional traffic movements from the site directly through the town centre thereby further exacerbating air quality issues. It is unclear if the LDP proposals for a one-way system (PROP 27) in central Tranent, should it be deliverable/desirable in the first instance, would be sufficient to off-set impacts from the Windygoul development albeit this potentially disruptive one-way system would not be required where the eastern development option was favoured facilitating the eastern and southern by-pass of Tranent town centre.

3.11 It is also noted that the PROP TT1 allocation at Windygoul lies directly adjacent to an established industrial area. It is unclear what future impact the proposed residential development at Windygoul may have on the ability of employment uses to operate/expand. Employment uses should have a reasonable expectation that their operations will not be adversely impacted/constrained by non-compatible development on neighbouring sites, particularly where there are better alternative development sites readily available to meet identified housing requirements, as in this case. It is unclear what land use compatibility assessment has occurred (as it is not addressed in the draft development brief for the site) and it is certainly not in the interests of either the employment use or future residents to have such a close physical relationship.

4.0 CONCLUSIONS

4.1 The proposed allocation of the subject site(s) at East Tranent for residential and related development represents a logical and deliverable development option within Tranent. Not only are these sites closer to the town centre than the preferred site at Windygoul (PROP TT1), development at East Tranent is the only option that provides direct transportation and air quality benefits to the town centre as a result of the southern (and potential eastern) By-pass of the High Street that would be delivered. The site(s) is well located with respect to Tranent and its facilities, and would be fully integrated in form and function. The proposal, no matter the scale of the allocation, also makes full provision to address education issues arising from the development (school site and contributions) and would contribute to the upgrading of the A1(T) Bankton Junction; all of which accords with the stated requirements in the emerging LDP. As indicated, the site could be allocated in full (Document 1) or in part (Document 2) and still represent a deliverable development option in a location and of a form to positively contribute to the LDP development strategy and quality of development in Tranent.

4.2 There is no clear or justified basis set out in the emerging LDP, or in any supporting documents, indicating why the Windygoul site (PROP TT1) is considered that best served to meet either strategic policy/objectives or the specific needs of Tranent. The site is further from the High Street, it is bounded (in part) by industrial

uses, and the traffic to/from the site will add to road capacity and air quality problems identified in central Tranent.

4.3 For all of the reasons set out above, the deletion of site PROP TT1 Windygoul and the addition of the identified site(s) at Tranent East is considered fully justified with respect to the strategic and local objectives arising from the emerging LDP.

DOCUMENTS

Document 1 - Site Boundary with Sketch Masterplan

Document 2 - Reduced site with Sketch Masterplan

ROY MITCHELL DESIGN

FUTURE VEHICULAR LINK TO SANDERSONS WYND & A1 INTERCHANGE

GREENSPACE ALONG PATHWAY

25M WIDE TREE PLANTING DEFINING EDGE OF SETTLEMENT EXPANSION.



PHASE 2

PHASE 3

BUS11

DP5
BUS1

BUS2

H27

DP5
ENV1

ENV1

CONTINUATION OF STREET FRONTAGE

NEW ROUNDABOUT ENTRANCE STATEMENT INTO TRANENT

CYCLEWAY

25M WIDE TREE PLANTING DEFINING EDGE OF SETTLEMENT EXPANSION.

2 NO FOOTBALL PITCHES, MUGA, PAVILION & CAR PARKING - RECREATIONAL FACILITY.

NEW ROUNDABOUT CREATING LINKAGE FOR SOUTHERN/EASTERN DISTRIBUTOR ROAD BY-PASSING TOWN CENTRES.

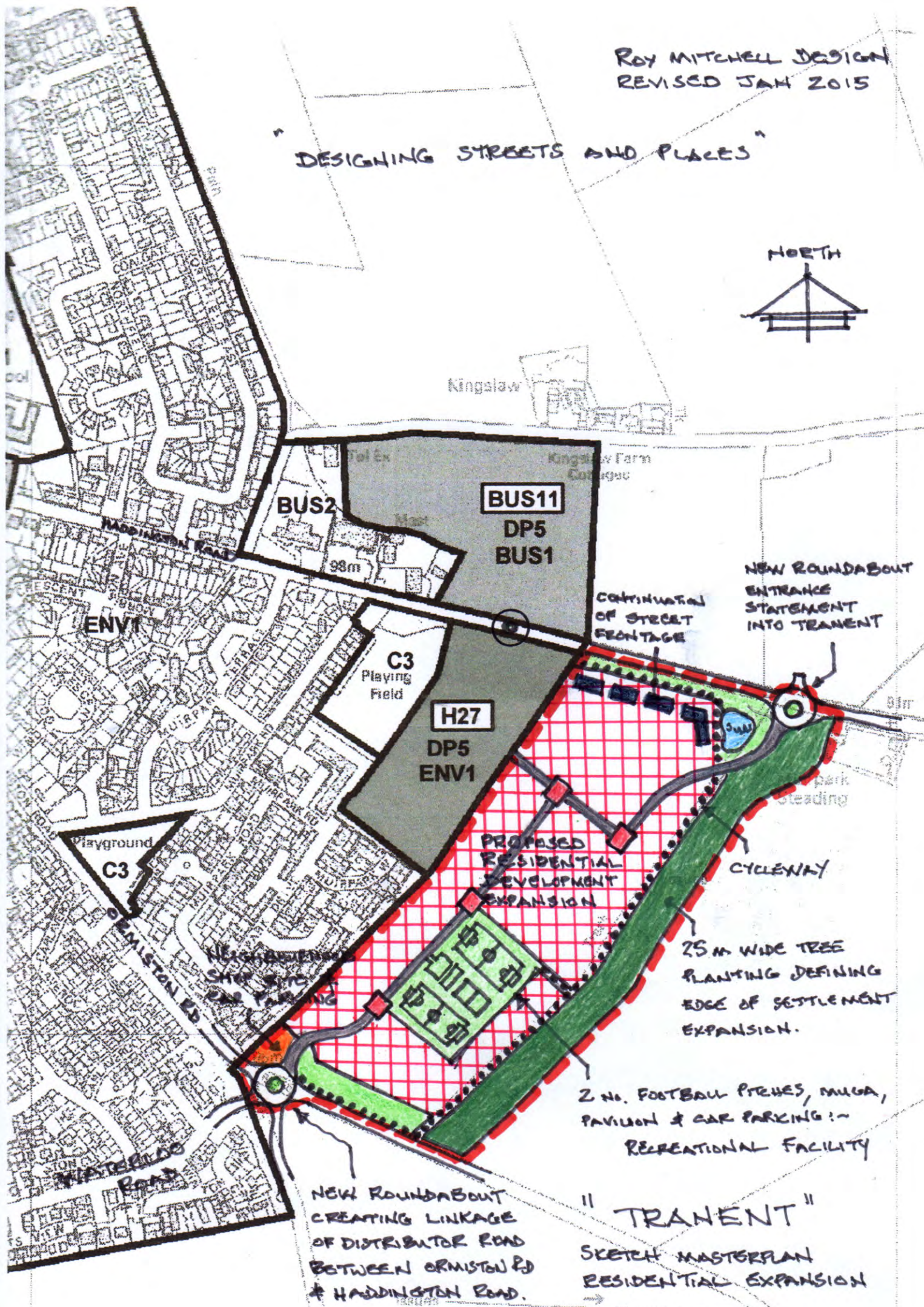
TRANENT

"DESIGNING STREETS & PLACES"

SKETCH MASTERPLAN RESIDENTIAL EXPANSION.

ROY MITCHELL DESIGN
REVISED JAN 2015

DESIGNING STREETS AND PLACES



NEW ROUNDABOUT
ENTRANCE
STATEMENT
INTO TRANENT

CONTINUATION
OF STREET
FRONTAGE

BUS11
DP5
BUS1

BUS2

H27
DP5
ENV1

C3
Playing
Field

C3

PROPOSED
RESIDENTIAL
DEVELOPMENT
EXPANSION

CYCLENAY

25 M WIDE TREE
PLANTING DEFINING
EDGE OF SETTLEMENT
EXPANSION.

2 NO. FOOTBALL PITCHES, MUGA,
PAVILION & CAR PARKING ~
RECREATIONAL FACILITY

NEW ROUNDABOUT
CREATING LINKAGE
OF DISTRIBUTOR ROAD
BETWEEN ORMISTON RD
& HADDINGTON ROAD.

" TRANENT "
SKETCH MASTERPLAN
RESIDENTIAL EXPANSION