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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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Bulletin	Mar17

## **Proposed East Lothian Local Development Plan Schedule 4 Representation Responses**

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

[http://www.eastlothian.gov.uk/meetings/meeting/5908/east\\_lothian\\_council](http://www.eastlothian.gov.uk/meetings/meeting/5908/east_lothian_council)

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

For further information or advice, please contact:

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

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

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: ..... **ANDREW AGNEW** .....

Address:.....

**From:**  
**To:** [Local Development Plan](#)  
**Subject:** Proposed Local Development Plan  
**Date:** 04 November 2016 12:10:09

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We wish to request that Salcoats(NK7), Fenton Gait East (NK8) and Fenton Gait South (NK9) are removed from East Lothian proposed Local Development Plan for the following reasons:

1. prime agricultural land should not be used for new housing particularly when brownfield sites are available.
2. priory must be given to development of the Fire College which could end up being an eyesore if the site remains undeveloped
3. the cumulative effect of 4 major developments in Gullane would be a massive expansion of the village, which does not have suitable infrastructure and employment opportunities to support such large scale development.

Shirley and Andrew Graham



**From:** .  
**To:** [Local Development Plan](#)  
**Subject:** East Lothian Council's Local Development Plan.  
**Date:** 04 November 2016 10:57:18

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Dear Sir(s), I write to request that the greenfield sites SALTCOATS(NK7), FENTON GAIT EAST(NK8) & FENTON GAIT SOUTH(NK9) which are earmarked for housing development be removed from the proposed Local Development Plan(LDP).

My reasons are as follows:

-The proposed developments would appear not to be sustainable,with poor access to employment & services.They would damage future opportunities for leisure & recreation in one of East Lothian's most attractive locations and have negative impacts on the amenities of local people.

-there would be over-development with 3 major sites concentrated in the East of the village with an unprecedented 30% growth in the village. This over-development is wholly unreasonable.

-the inclusion of all 4 sites in the LDP is grossly unbalanced and Gullane will not be able to absorb it.Indeed,if all 4 sites remain,Gullane will be contributing 50% of all the new sites from the North Berwick Coastal area.

-the cumulative impact on Gullane or on the rural network has never been properly assessed,in particular the narrow C111 towards West Fenton where use by its many vulnerable users will become extremely dangerous.Moreover,the present road is totally inadequate for the increased traffic that is bound to occur. Road safety issues are bound to increase,not least the increased traffic along the A198 between Gullane & Luffness Golf Clubs.

-there will be a major impact on Gullane school and the Medical Centre.Recent housing development in the village has resulted in an average of 1 school pupil per new house. Should all the sites proceed, East Lothian Council is proposing only two additional classrooms.This would be totally inadequate for the new children. At the Medical Centre, waiting times for patients can sometimes be over an hour.These will undoubtedly be exacerbated with the new influx of people from the new developments.

-Access to public transport,especially trains,falls well below what would be required,particularly for Saltcoats(NK7).Moreover,the local bus & train services are already woefully inadequate with massive overcrowding especially at rush hour.

-No mention is made of any future local employment for the new occupants of the houses.All that will happen is that the East Lothian road/rail network which is already overstretched will become even worse with the increase in new commuters travelling to/from Edinburgh clogging up the roads and railways even more than at present.

The retail,etc facilities are all at the opposite end of the village where parking is already at a premium. Every occupant of the new houses wishing to use these facilities will always have to use a car to access them. Moreover,the use of Greenfield sites means that crucial agricultural land is being used. So much for East Lothian Council respecting the environment or meeting its 'green' commitments!

-The Village Hall would be inadequate for the increased number of personnel.

-The whole scheme smacks of 'Big Brother' with the Scottish Government on the side of the developers and already rich landowners-all to the detriment of the local inhabitants and local democracy.

Apart from the above, I do not believe that a sufficiently convincing case has been made by the Scottish Government for the additional 10,500 houses in East Lothian.Nor has a sufficiently robust case been made for Gullane to encompass so many developments.The obvious place for development in Gullane is the Fire School Brownfield site.As far as I am aware, everyone in

Gullane can accept that any development should take place there.

For all the above reasons, the only site in Gullane that should be zoned for housing in Gullane should be the Fire School. Accordingly, the three Greenfield sites referred to above should be removed from the proposed LDP.

Yours etc, Tim Jackson,

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**From:**  
**To:** [Local Development Plan](#)  
**Subject:** FW: East Lothian Council's Local Development Plan.  
**Date:** 04 November 2016 11:05:32

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Dear Sir(s), I write to fully support all the comments made by Tim Jackson in the message below.

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**From:** Tim Jackson [ ]  
**Sent:** 04 November 2016 10:57  
**To:** 'ldp@eastlothian.gov.uk'  
**Subject:** East Lothian Council's Local Development Plan.

Dear Sir(s), I write to request that the greenfield sites SALTCOATS(NK7), FENTON GAIT EAST(NK8) & FENTON GAIT SOUTH(NK9) which are earmarked for housing development be removed from the proposed Local Development Plan(LDP).

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-the inclusion of all 4 sites in the LDP is grossly unbalanced and Gullane will not be able to absorb it. Indeed, if all 4 sites remain, Gullane will be contributing 50% of all the new sites from the North Berwick Coastal area.

-the cumulative impact on Gullane or on the rural network has never been properly assessed, in particular the narrow C111 towards West Fenton where use by its many vulnerable users will become extremely dangerous. Moreover, the present road is totally inadequate for the increased traffic that is bound to occur. Road safety issues are bound to increase, not least the increased traffic along the A198 between Gullane & Luffness Golf Clubs.

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-The Village Hall would be inadequate for the increased number of personnel.

-The whole scheme smacks of 'Big Brother' with the Scottish Government on the side of the developers and already rich landowners-all to the detriment of the local inhabitants and local democracy.

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For all the above reasons, the only site in Gullane that should be zoned for housing in Gullane should be the Fire School. Accordingly, the three Greenfield sites referred to above should be removed from the proposed LDP.

Yours etc, Tim Jackson,

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

31 October 2016



Dear Sir

### **Proposed East Lothian Local Development Plan 2016**

Why 4 Housing Sites in Gullane is POOR PLANNING - the developments are not sustainable, having poor access to employment and services. They would damage future opportunities for leisure and recreation in one of the region's most attractive locations and have negative impacts on the amenities of local people.

This would be over-development at a scale beyond what is reasonable, having 3 major sites concentrated in the East of the village with an unprecedented 30% growth in the village.

The inclusion of ALL 4 sites in the LDP is grossly unbalanced and overestimates the capacity of Gullane to absorb it. If all these 4 sites remain Gullane will contribute 50% of all the new sites from the North Berwick Coastal area.

The cumulative impact on Gullane has not been properly assessed, nor has the impact on the rural road network, and in particular for the C111 towards West Fenton, where use by its many vulnerable users will become impossible.

The access to public transport (trains in particular) falls well below what would be needed particularly for Saltcoats (NK7).

The facilities of Gullane are at the complete opposite end of the village. Even simple errands will demand a car journey.

The cumulative effect on the Gullane Conservation Area would ruin its amenity and create road safety issues arising from awkward parking.

The inclusion of the two major Greenfield sites would compromise the delivery of the Brownfield site.

Community facilities, in particular the Village Hall, cannot meet increased level of demand. The scale of change and a duration of development of more than 10 years will prove extremely difficult to mitigate thus impacting tourism and day to day life in the Village to an unreasonable level.

The impact on school and medical facilities will be major. Recent housing developments in Gullane have resulted in an average of 1 school pupil per new house. The proposal from

East Lothian Council for only two additional classrooms were all the sites to proceed is totally inadequate.

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

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

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

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

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

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

Please acknowledge this letter.

Yours faithfully

Frances R Cowie



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

31 October 2016



Dear Sir

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Please acknowledge this letter.

Yours faithfully

  
Gordon F Cowie





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



Sent By Email :  
 To: [ldp@eastlothian.gov.uk](mailto:ldp@eastlothian.gov.uk)

3<sup>rd</sup> November 2016

Dear Sirs,

**Proposed East Lothian Local Development Plan:**  
**TT16 Dryden Field East Saltoun**  
**Response to Public Representation**

I am writing to formally register my objections regarding the inclusion of Dryden Field (TT16) in East Saltoun within the Proposed East Lothian Local Development Plan. No consideration has been given to the impact on the village or its inhabitants. Other than contributing towards the fulfilment of the housing quota I see no justification for such development to proceed and I put forward the following as evidence to support this.

The following are the key planning issues giving rise to my objection:

- The proposal for 75 houses at Dryden Field fails to meet the criteria set out in the Plan's Strategic Environmental Assessment
- 75 houses will overwhelm the conservation area of East Saltoun which has little more than 100 houses at present. Development of this scale is not appropriate to the character of this rural conservation area and does not accord with National Policy guidance
- Infrastructure, particularly public transport, is not adequate for such a large housing growth
- A large area of prime agricultural land will be lost and is contrary to the Scottish Planning Policy to protect prime agricultural land

**1. Suitability.**

The Main Issues Report (MIR) of the East Lothian Development Plan did not include Dryden Field as either a preferred or reasonable alternative site for development. Therefore, Dryden Field was not given the due diligence afforded the preferred sites within the MIR.

The Proposed Local Development Plan Appendix 7 Tranent Area Site and Strategic Environmental Assessments (Part 2) lists 19 criteria for Dryden Field. These criteria fall under 2 headings covering Suitability and Deliverability and Potential Impacts of Development. Under the former heading there are 9 points of which 2 are scored red, 6 are scored amber and only 1 is scored green. Under the latter heading there are 10 points of which 2 are scored red, 4 are scored amber and 4 are scored green. Furthermore, if the scoring was consistent (see Point 7) there would be 2 further reds under Suitability and Deliverability. In summary of the 19 points listed 4 are scored red, 10 are scored amber and only 5 are scored green. Material Assets being scored 'Significantly Adverse'. None being scored 'Significantly Positive'. This result does not indicate suitability.

Confusingly there are two versions of this assessment on the East Lothian Council website. Both titled *Environmental Report 2016 Appendix 7 Tranent Area Part 2 Site and Strategic Site Environmental Assessments*. Despite the narrative descriptions for Dryden Field in both assessments being identical the scoring assigned to each item within the assessment differ. This other assessment is located here - [153/16 Proposed Local Development Plan Draft Environmental report Appendix 7 Tranent Area Site and Strategic Environmental Assessments - Part 2.](#)

In this assessment, under Suitability and Deliverability there are 9 points of which 2 are red, 6 are amber and only 1 is green. Under Potential Impacts of Development there are 10 points of which 4 are red, 4 are amber and only 2 are green. In summary of the 19 points listed 6 are scored red, 10 are scored amber and only 3 are scored green

## **2. Infrastructure.**

There is no gas supply into the village.

Broadband speed is well below an acceptable level with no guarantee of speeds improving in the near future.

Mobile 'phone coverage is very patchy at the best of times.

(If home working is to be encouraged these two points will prevent it.)

Water supply and sewage already at capacity.

## **3. Transportation**

The Proposed Local Development Plan, under Transportation – Location of New Development states:

*The Council's policies seek to integrate land use and transport to encourage a reduction in traffic growth, minimise the length of journeys people are obliged to make and promote sustainable alternatives to the private car – public transport, cycling and walking. This is to be achieved by seeking to:*

*resist proposals for out-of-centre developments where their siting would encourage longer journeys, especially by private car;*

*If a significant travel generating development would be reliant on private car use it should not be supported unless there is a way to provide sustainable transport options, including active travel.*

Currently East Saltoun has a rural bus service serving the local community. East Saltoun has no direct bus service to Edinburgh. It is reasonable to assume occupants of affordable housing would probably have to rely on public transport.

Being a rural location other occupants may well have more than one vehicle to permit commuting and local access. Bringing further congestion to the local roads and damage to the environment.

Although East Saltoun Primary School may have capacity for additional pupils the current provision for collecting and dropping off pupils cause congestion in the morning and afternoon. This will be exacerbated with additional pupils.

#### **4. Population.**

In The Proposed Local Development Plan under sub-heading Population and Households, Paragraph 1.18 it is stated that by 2023 the largest growth in population by age in East Lothian will be the over 75's at an increase of 95%. It would seem reasonable individuals in that age group would be better served living close to facilities and services they would require. E.G. Doctors, hospitals and shops. Currently the nearest large town with such facilities is Haddington. Over 6 miles away from the proposed development.

#### **5. Scottish Planning Policy**

The proposed development is contrary to the following statements made in the Scottish Planning Policy 2014.

##### **Promoting Rural Development**

##### **Policy Principles**

##### **Paragraph 75**

*The planning system should:*

- *in all rural and island land areas promote a pattern of development that is appropriate to the character of the particular rural area and the challenges it faces;*

Increasing the size of the village of East Saltoun by over 50% is not appropriate to the character of the rural area. Additionally, Historic Scotland state that as the proposed development is within a Conservation Area it has the potential to fundamentally change the character of the Conservation Area. The suggestion of constructing two storey homes placed on a northerly facing slope in the highest and most exposed elevation and most visible location in the village would only make matters worse with the development being clearly visible from the Garleton Hills, Lammermuir Hills and Traprain. Furthermore the placement of two storey homes in this location means they would be exposed to the northerly winds as the location affords minimal shelter. It is also contrary to the character of the surrounding homes which are primarily 1.5 storeys.

- *encourage rural development that supports prosperous and sustainable communities and businesses whilst protecting and enhancing environmental quality;*

It is reasonable to assume the majority of people living in the proposed development would be commuting to Edinburgh. As public transport is minimal the *development would lead to an increase in car-based journeys and resultant greenhouse gas emissions.* (Quote from Proposed Local Development Plan Appendix 7 Tranent Area Site and Strategic Environmental Assessments (Part 2) – Climatic Factors).

As street lighting would also be required this would increase the light pollution and certainly not enhance environmental quality.

##### **Delivery**

##### **Paragraph 79**

Plans should set out a spatial strategy which:

- considers the services provided by the natural environment, **safeguarding land which is highly suitable for particular uses such as food production or flood management.**

The proposal is to turn 10.7 hectares of prime agricultural land, currently used to produce cereal and food crops, into building plots and woodland. This is contrary to the statement where land used for food production should be safeguarded.

#### **Paragraph 80**

*“Where it is necessary to use good quality land for development, the layout and design should minimise the amount of such land that is required. **Development on prime agricultural land, or land of lesser quality that is locally important should not be permitted except where it is essential:***

- *As a component of the settlement strategy or necessary to meet an established need, for example for essential infrastructure, where no other site is available; or*
- *For small-scale development directly linked to a rural business; or*
- *For the generation of energy from a renewable source or the extraction of minerals where this accords with the policy objectives and there is secure provision for restoration to return the land to its former status.”*

This proposed development is contrary to Paragraph 80 and does not meet any of the points regarded as essential.

Furthermore, as the Scottish Planning Policy, (along with SESPlan Strategic Development 2 and National Planning Framework) form the statutory context for the proposed Local Development Plan, the preceding points demonstrate the inclusion of Dryden Field within the Proposed Local Development Plan as clearly contradictory to this statutory context. Dryden Field, East Saltoun is classified as Class 3.1 Prime Agricultural Land. This classification is defined by the Macaulay Land Use Research Institute as *“capable of producing a moderate range of crops with high yields of cereals and grass.”*

Historically Dryden Field has been used to grow cereal crops. Is this the best use of prime agricultural land used to support the local community? (Bairds Maltings in Pencaitland, Pure Malt in Haddington) (80% of barley used at Glenkinchie Distillery comes from East Lothian). Therefore, also locally important. Overall development site area now extends to 10.7 hectares, 6.4 hectares of which is proposed to be turned into community woodland. (Source: Draft Development Brief Part 1). Again is this the best use of prime agricultural land? More likely leaving the potential for further development. At a conservative yield of 4 tonnes per acre this equates to a loss of over 100 tonnes of cereal crop annually.

According to Scottish Natural Heritage the Key Strategic Aim for the Haddington Plain, which includes Dryden Field, is to *‘Retain core agricultural character.’*

## **6. Usage**

Geddes Consulting response on behalf of Hamilton and Kinneil states *‘The Estate is seeking to retain some of the private homes for private letting including holiday homes’*. The intention of this program is to supply accommodation for the anticipated population growth. Creating homes for holiday rental is not fulfilling this objective.

In a normal situation, would the estate be given planning permission to build these types of homes on prime agricultural land? I would very much doubt so and therefore should not be included within the Proposed Local Development Plan.

**7. Proposed Local Development Plan Appendix 7 Tranent Area Site and Strategic Environmental Assessments (Part 2)**

The scoring in this Assessment is inconsistent:

<b>West Crescent – East Saltoun</b>		<b>Dryden Field – East Saltoun</b>	
<b>Suitability and Deliverability of Site</b>		<b>Suitability and Deliverability of Site</b>	
<b>Accessibility</b>	<b>Score</b>	<b>Accessibility</b>	<b>Score</b>
The site is within 400m of bus stops. Bus stops on Main Street are roughly 200m from the site with limited services to Haddington, Gifford and Tranent. These services may not provide a viable option for commuting. The site is not within 800m of a train station and local facilities in East Saltoun. There is a limited range of facilities in East Saltoun, within 1600m of the site.	<b>RED</b>	The site is within 400m of a bus stop with a limited service to Haddington, Tranent and Gifford. There is no rail station within 800m. There is a limited range of local facilities within 1600m, including shop, church, primary school and village hall.	<b>Amber</b>
<b>Exposure</b>	<b>Score</b>	<b>Exposure</b>	<b>Score</b>
Existing development to the north will provide some shelter from northerly winds, however the site's north facing topography means it is still fairly exposed.	<b>RED</b>	Existing development and woodland to the north of the site provide a degree of shelter from northerly winds, however the local topography means the site is still somewhat exposed.	<b>Amber</b>

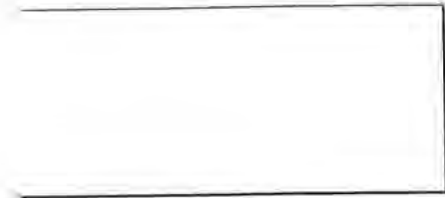
The inconsistency in the scoring appears to make the proposed development of Dryden Field as having less of an environmental impact. However, on the contrary, if the scoring was more accurate it makes the proposed development as having a greater impact on the environment.

In summary, when reading the aforementioned observations proposing Dryden Field as suitable for development simply does not make sense. Will the rule book be torn up simply to meet a numeric target or will logic prevail and consideration be given to more appropriate sites?

Yours sincerely,

Clive A. L. Lucas





Policy & Projects Development  
Partnerships & Services for Communities  
East Lothian Council  
John Muir House  
Haddington  
EH41 3HA  
3<sup>rd</sup> November 2016



Dear Sirs,

**Proposed East Lothian Local Development Plan:**  
**TT16 Dryden Field East Saltoun**  
**Response to Public Representation**

I strongly object to the development of 75 houses at Dryden Field in East Saltoun. How can a proposal that only meets 26% of planning criteria seriously be considered? (based on information from the Main Issues Report). This Main Issues Report states that Dryden Field is not a viable site with only 5 green scores (out of a possible 19).

East Lothian are being asked to allocate a disproportionate number of houses in our County compared to the rest of Scotland. This will result in destroying the very reason its residents choose to live here and will see the demise of its historic conservation villages. SNP Councillors voted against the Proposed Local Development Plan at a meeting on 6<sup>th</sup> September 2016 – going against their own Government policies, because they have listened to and were representing their constituents wishes. These wishes have been dismissed.

East Lothian Council were facing a shortfall in the number of houses that it has been told by the Scottish Government are required to be built up to the period 2024 (in excess of 10,000). This was partly due to the failure of some larger sites coming to fruition. As a result of this shortfall, **landowners were asked to put forward plots of land that THEY believed appropriate for development.** Never mind good planning, where is any kind of planning involved in this type of way forward?

The site at Dryden Field in East Saltoun was one of these sites put forward by a land owner and has **not been part of any full Environmental Assessment.** It is not satisfactory to include a development in the Local Development Plan where insufficient research has been carried out into the suitability for housing.

Dryden Field, owned by Hamilton Estates, was put forward initially to include 50 homes. This has now increased to 75 (including 25% of affordable homes). Some of these are to be for **private rental (and possibly holiday homes) – how does this meet any kind of housing shortfall?** This is only to line the pockets of the landowner and meet his own needs.

Dryden Field is **prime agricultural land** – what about Scotland's Bread Basket? – will we be waving goodbye to that statement forever?

Dryden Field is **in the middle of nowhere**. Considered to be part of the Tranent Cluster but in fact, there isn't any public transport that will allow residents to get to Tranent. Our only facilities are a small and excellent Primary School, the Church (currently closed) and the Community owned Village Hall. Where will the residents in these new homes work? How will they get to work? Where will they shop? How do they get to the doctor? We have a poor bus service that would not be suitable for commuting and it has been stated by East Lothian Council that no additional facilities will be provided.

I want a village that doesn't become a commuter ghetto. How will families raising their children get about? Each new household will require 2 cars simply to exist, surely not a viable proposal for those living in the 'affordable housing'. This is totally **against any environmental strategy**.

I want to be able to listen to and see the wildlife in our beautiful County. The bats that feed in the evenings in Dryden Field need to be protected. I have received no response to my request to East Lothian Council for a **Bat Survey** (letter dated 19<sup>th</sup> May 2016).

I do believe the opportunity exists to increase the housing stock in East Saltoun but only in proportion to the size of the village. Perhaps at a rate that is equivalent to the growth of population in East Lothian – say 25% growth by 2037. This would equate to less than 2 houses per year. What is currently being proposed is **more than double the anticipated population growth**.

Building 75 houses in Dryden Field is at the highest and most visible point of the village and the furthest point from the School, Church and Village Hall. It would be in the best interest of the village for any housing development to be closer to these facilities. There is a small field, close to and behind the school, that is on a much lower level than Dryden Field. Dryden Field is visible from Traprain Law and the Lammermuir Hills – the proposed woodland would take years to screen any new development.

Alternatively, could the proposal at Blindwells not be developed as a **New Town for East Lothian**, creating a whole network of support services to serve a large Community? It has been suggested that up to 6000 new homes could be built at this site. Surely a better alternative than changing the nature of all the villages in East Lothian.

We only have one chance when it comes to converting green fields into housing stock – please do not irrevocably change the nature of why people want to live in East Lothian.

Yours sincerely,

Sally Lucas'



4/11/16

Paul \_ John Gray

Policy and Projects Develop.  
East Lothian Council  
Planning Re: Rellp/Gen  
Land at " Meadowmills "  
East Lothian, EH33 1LZ

Dear Sir or Madam

27 Oct. 2016

We have four acres of derelict land at Meadowmills which is at present on East Lothians Planning Policy DC1. In the past we made several enquires to planning regarding possible use, they advised us to apply for a policy review as our present policy is very limited to types of planning approvals.

Planning policy team manager Andrew Stewart suggested we apply for policy review through the new emerging SES Plan which gives land owners the opportunity for those wishing to promote derelict land such as ours, we have taken all advice given to us by E.L.P.D. Policy team manager, to now be told by him recently, he cannot help us, his dept. will now only be considering proposals from local Councillors, So we requested local councillors "Donald Grant", and "Willie Innes," to take over our policy review which may allow some houses, and units, to be developed on our derelict land, after Councillors checking with "Business Gateway" and a few other depts, came back to us very supportive. They said they would support some new houses if! In alignment with existing housing. they also stated that all areas in "East Lothian" had a serious shortage of available Business and storage units, with landscape, and tree screening, our land could be put to very good use, helping infrastructure around the area, i.e. two thousand houses at "Blindwells", not even one mile away from our four acres of land, councillors said they would now bring all proposals forward at their next committee meeting, however we contacted councillor "Donald Grant" and asked him how things went?

It is an absolute disgrace that a professional dept. Especially! Planning deny me of my democratic rights to engage in the process! to promote development and also this opportunity to submit through! my local Councillors, my four acres of land for that development, through the near finalised S.E.S Plan.



How can "council planning team" recommend that the D.C.I policy on our four acres of derelict land be reviewed for policy change through the emerging S.E.S Plan. appeared prior to committee meeting,

Two thousand houses are to be build ,not even one mile away from our site, and on an old mine, Blindwells I would suggest the only beneficiaries from this S.E.S Plan will be the "flagships", key stages in S.E.S specifically ! state this will be an opportunity for people to engage in the process to, promote! their land for development, I have enclosed , and highlighted this Stage one document for your attention.

Thanking You

Yours Faithfully



**East Lothian  
Council**

Our Ref: ELLDP/3  
Your Ref:  
Ask for: Phil McLean  
Direct Line: 01620 827017  
Fax: 01620 827723  
Email: pmclean@eastlothian.gov.uk  
Date: 24<sup>th</sup> June 2010

Paul Gray  
2 Smeatonhead Farm Cottages  
Dalkeith  
EH22 2NJ

Dear Sir,

### **LAND AT MEADOWMILL, TRANENT**

I refer to your letter dated 7<sup>th</sup> June 2010 with attached plan, seeking advice on the re-designation of your land in planning policy terms to allow development. Your letter does not specify any particular type of development but I assume you are referring to residential development.

The Council adopted the East Lothian Local Plan 2008 in October 2008 following a public inquiry into objections to the Plan; there are now no further opportunities to propose changes to this Plan. As you are aware, the site in question is designated as countryside in the Local Plan, where policy DC1 applies, which seeks to restrict development except in certain defined circumstances.

The Council will be commencing preparation of a new Local Development Plan later this year, which will eventually supersede the existing Local Plan. During the process of preparing this Plan there will be opportunities to make comments and put forward sites for development. We have a list of interested parties who have asked to be kept informed of progress with the Local Development Plan. Please let me know if you wish to be added to this list to ensure you are made aware of relevant consultation opportunities.

You may also wish to make comments on the Strategic Development Plan for South East Scotland (SESplan), which is a higher-level strategic plan that will set the context for the East Lothian Local Development Plan. The SESplan Main Issues Report is currently being consulted on until 27<sup>th</sup> August 2010. Details are available online at [www.sesplan.gov.uk](http://www.sesplan.gov.uk) or you can phone 0131 524 5165.

I trust the above is of assistance. Should you wish to discuss the matter further please do not hesitate to contact me.

Yours sincerely,

Phil McLean  
Planner, Policy and Projects

Areas, in the countryside and in town centres, and to deal with specific issues such as the location of wind turbines and the design of new development.

The adopted ELLDP<sub>one</sub> will be supported by a number of documents:

- An **Environmental Report** assessing its likely significant environmental effects and how it has taken these into account
- A **Habitat Regulations Assessment** looking at its impacts on Natura 2000 sites (the network of sites protecting the best of European wildlife) including the Firth of Forth and Forth Islands Special Protection Areas
- An **Action Programme** setting out the requirements for delivering its policies and proposals

The adopted ELLDP<sub>one</sub> may also be supported by:

- **Supplementary Planning Guidance**, including detailed planning policies, development frameworks and briefs.

## **Key Stages in the preparation of ELLDP<sub>one</sub>**

---

### ***STAGE ONE: Initial engagement: Autumn 2011***

SESplan's Proposed Plan will be approved by its partner Councils during August to October 2011 and subsequently made available for comment and objection. This will give us a good indication of how this plan, when eventually approved, would influence the planning policies and proposals to be included in ELLDP<sub>one</sub>.

We see our consultation process being based on a discussion paper that will be made widely available. It will consider the amounts and broad locations of development land that ELLDP<sub>one</sub> would need to identify to meet emerging SESplan requirements. It will also consider what land use planning policy issues ELLDP<sub>one</sub> should address.

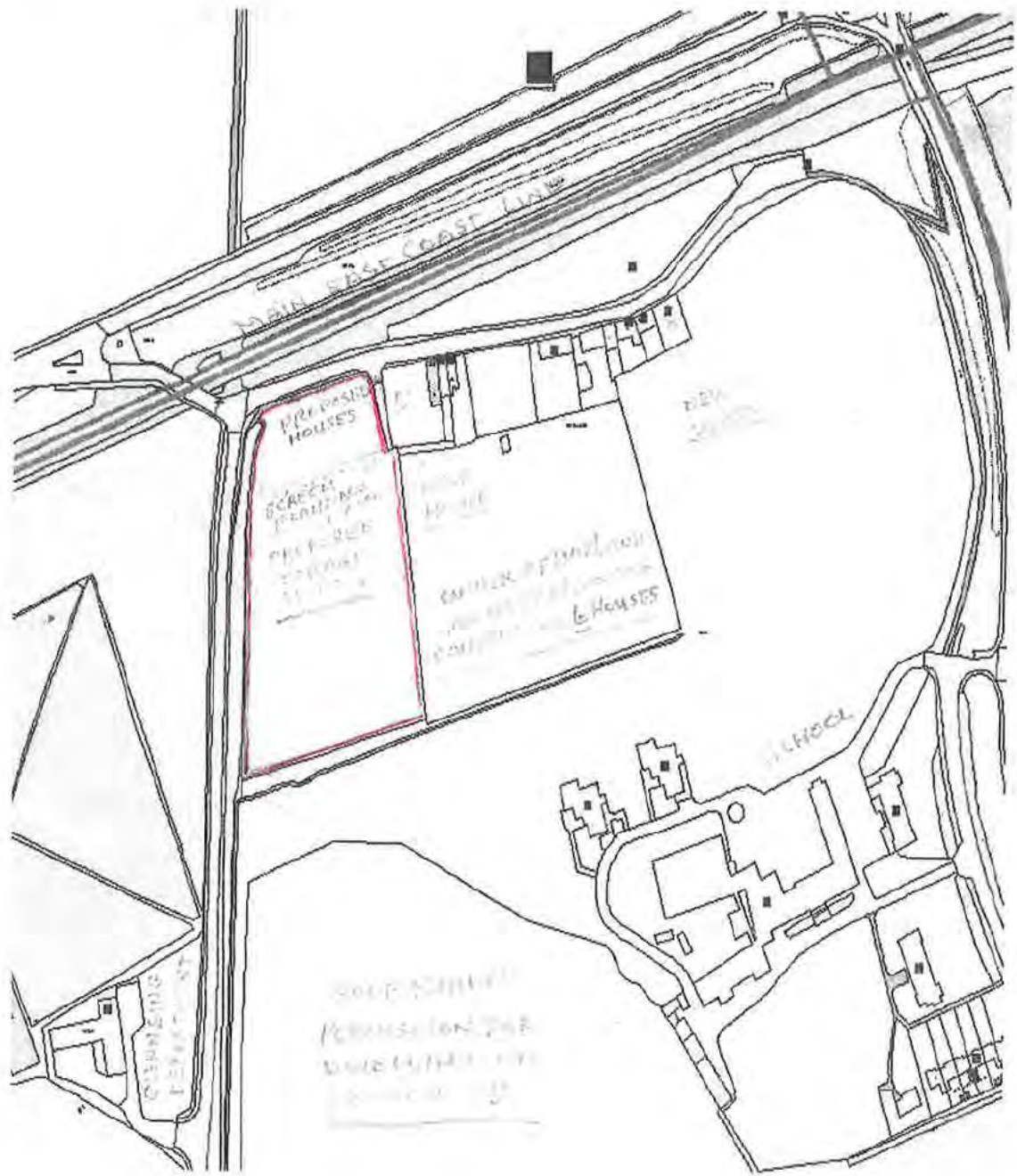
This will be an opportunity for people to engage in the process and to let us know what they think is important for the planning of East Lothian. For those wishing to promote development sites, it will be an opportunity to submit these to us for consideration. These submissions should be accompanied by a reasoned justification for their inclusion in the plan and a proportionate evidence base to demonstrate that they are a sustainable proposal in a sustainable location and that they are deliverable. This evidence should include an estimate of the lead-in to and the phasing and timing of development, including any significant infrastructure requirement. We will make available a pro forma on which this information can be provided and submitted to us.

Please note that SESplan will provide a chance to comment or object to their Proposed Plan following its publication in November 2011. Any comments on its broad strategy, for example total numbers of houses to be provided for, and its broad location, should be made to SESplan (<http://www.sesplan.gov.uk/> Tel: 0131 524 5165 Fax: 0131 524 5151 E-mail: [contactus@sesplan.gov.uk](mailto:contactus@sesplan.gov.uk).)

### ***STAGE TWO: Main Issues Report, Monitoring Statement, Environmental Report and Appropriate Assessment: Spring 2012***

The **Main Issues Report** is the main opportunity for consultation on the content of the plan. This will set out the Council's preferred strategy and the general policies and proposals for





# SAS DESIGN

## MR J GRAY & MR P GRAY HOUSING DEVELOPMENT AT MEADOWHILL

### CONTEXT

The site, approximately 0.4 hectares in area, forms the northern portion of a 1.2 hectare field owned by the Applicant and lies immediately west of the settlement of Meadowhill and immediately south of the main East Coast railway. It is bounded on the north and west sides by cul de sac roads with open land to the south and the southern part of the east boundary; the edge of Meadowhill lies on the northern section of the east boundary. It lies approximately 1 mile from Prestonpans and has good access to public transport and local facilities.

The site is comparatively flat with a slight cross-fall and there is evidence of limited upfill in some sections. Public utilities are locally available for connection but the housing will be supplied with private drainage, including a SUDS scheme for surface water, which will be designed in consultation with SEPA.

There is no flood risk, nor will development of the site create a flood risk to other properties.

None of the land is Class 1 in terms of agricultural use and whilst it lies out-with the current settlement boundary, it is understood that an appropriate scheme for housing use would be acceptable to the Local Authority.

### PROPOSAL

After some Pre-Planning Consultation with East Lothian Council, the scheme as shown on the accompanying drawings as presented for Permission in Principle. The main aims are:

- To complement the style and scale of housing in Meadowhill.
- To reduce the impact of additional traffic on the existing village.
- To provide a number of 2 bedroomed houses, affordable to local people.
- To allow for the possibility of incorporating low-carbon technology.
- To screen the new development from possible future appropriate non-housing development of the remaining site.

To achieve the above, the development comprises the following features:

- One larger 3 – 4 detached property is proposed for the end house at the existing road junction to create a “stop” to the development. The remainder of the housing comprises two terraces of four deep plan narrow frontage houses similar in style to the existing village.

# SAS DESIGN

- A new service access road will be formed to the south of the housing, incorporating parking for all bar the single house on a 2 cars per house basis. This will form the frontage for the houses which will therefore have their back gardens with appropriate fencing facing northwards, thus diverting additional traffic on to the new road which will be accessed from a junction on the cul-de-sac running along the west site boundary. The junction will be formed to Local Authority standards and a turning head formed for cars at the access road end.
- The houses will be serviced from the exiting road so that there will be no need for refuse vehicles to use the new access road.
- It is envisaged that the houses will have a two storey aspect facing northwards with a long sloping roof down to a single storey south-facing aspect; this will allow for the possible installation of low-carbon solar collectors on these south-facing roofs.
- The house plots are typically 6 metres wide x 25m deep, wider plots being created to allow for space between terraces and for the larger end house which will be sympathetic in form to the terraces.
- A planted screen will be formed along the south of the access road to screen the housing from the rest of the land owned by the Applicant.

## CONCLUSION

As this is an Application for Permission in Principle only, there is a degree of flexibility in the scheme. The above paragraphs describe the basic principles but the layout as drawn is somewhat indicative. Detail design will possibly produce slight variations to the building profiles as currently shown but still working within the general parameters as detailed herein.

The proposal is presented a scheme sympathetic to the present buildings which comprise Meadowhill and the Applicants would hope that it will be favourably received.

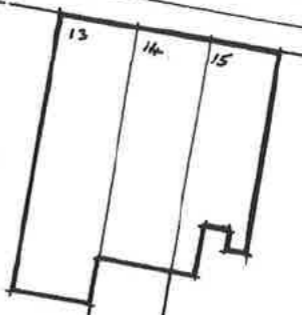
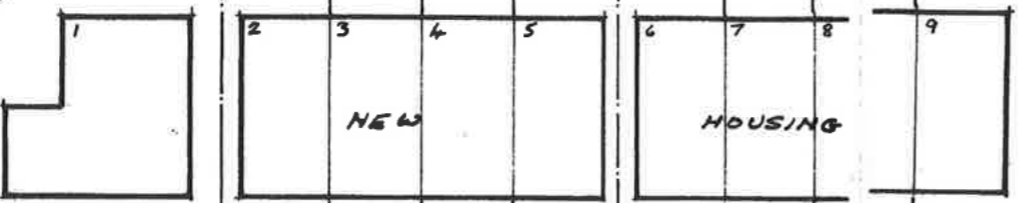
Stuart W MacGill  
SAS DESIGN

12<sup>th</sup> October 2016  
Job No SAS/2302

← TO PRESTONPANS

RAILWAY

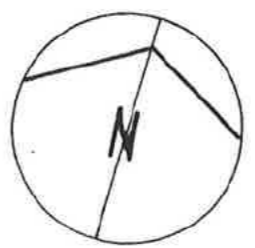
LOCAL ACCESS



SCREEN PLANTING

MEADOWHILL

LAND OWNED BY APPLICANT



ALL DIMENSIONS MUST BE CHECKED BY THE CONTRACTOR ON SITE PRIOR TO WORK COMMENCING

REVISIONS

PROJECT  
 MR J GRAY + MR P GRAY  
 HOUSING DEVELOPMENT  
 MEADOWHILL

TITLE  
 SITE LAYOUT

**SAS**  
**DESIGN**

STUART W MACGILL  
 RIBA ARIAS  
 21 LEMBERT DRIVE  
 GLASGOW G76 7NQ  
 TEL: 0141 638 3537  
 FAX: 0141 638 3539

SCALE 1:500

DRAWN BY SMEAG

DATE OCT 2016

DRAWING NO. SAS/2302/01

REV.

Submitted to **East Lothian Proposed Local Development Plan**  
Submitted on **2016-11-04 11:46:38**

## About You

### 1 What is your name?

**First name:**  
HolderPlanning

**Surname:**  
McGrath

### 2 What is your email address?

**Email address:**  
lesley.mcgrath@holderplanning.co.uk

### 3 Postal Address

**Address:**  
5 South Charlotte Street

### 4 Please enter your postcode

**Postcode:**  
EH2 4AN

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

Developer/ agent/ landowner

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

**Organisation:**  
CWP on behalf of Mr A P Dale and Mr R F Dale

**Your role:**  
submitting on behalf of CWP

### 7 Are you supporting the plan?

No

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

## Section 2b - Prestonpans/Cockenzie/Port Seton/Longniddry Cluster Strategy Map (pg 23)

**1a What modifications do you wish to see made to the Strategy map for the Prestonpans/Cockenzie/Port Seton/Longniddry 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. Do you have any comments to make on the**

#### **Modifications(s) Sought :**

Allocate the Port Seton Links for residential development through inclusion of a new proposal and identification of the site on the Proposals Map.

**1b Please give any information/reasons in support of each modification suggested to the Strategy Map for Prestonpans/Cockenzie/Port Seton/Longniddry Cluster. State all relevant paragraph numbers of the plan to which the modification(s) refer.**

#### **Justification for Modification(s) :**

The text of this representation will be emailed in a separate document with supporting appendices to ldp@eastlothian.gov.uk.

#### 1. Introduction

1.1 This representation has been prepared on behalf of Mr A P Dale and Mr R F Dale in response to the East Lothian Proposed Local Development Plan (LDP). It relates to land immediately east of Port Seton, between Port Seton and Seton Sands. The site is shown in Appendix 1 accompanying this representation, and in our view it should be allocated for residential use in the Local Development Plan. The site has a capacity of up to 90 homes.

1.2 Port Seton is within the East Coast Strategic Development Area identified in SESplan, and is therefore considered in general terms to be a sustainable



location for new housing development, relatively close to Edinburgh and a good strategic transport network.

1.3 Our separate representation in respect to Housing Supply & Demand concludes that the Proposed LDP does not identify enough housing sites to meet the SESplan housing requirements for East Lothian. Consequently, additional housing sites will need to be allocated, and we recommend that Port Seton Links is one of these.

1.4 The site is proposed to be subject to the Proposed LDP's new Countryside Around Towns policy. We do not agree with the principle of this policy, but even if it is adopted we do not consider it to be relevant to this site. We have made a separate representation to this effect.

1.5 As explained in the Landscape Assessment of the site accompanying this representation (Appendix 2), the site can be developed for housing without harming the character of the area.

## 2. Planning Policy Context

### SESplan

2.1 The East Lothian Local Development Plan must conform to the Strategic Development Plan for the Edinburgh and South East Scotland area (SESplan) and its Supplementary Guidance. The MIR states that to conform to SESplan, the LDP must allocate land sites for 6,250 houses for the period 2009 to 2019 and 3,800 houses for the period 2019 to 2024.

2.2 SESplan's Spatial Strategy and policies (Figures 1 and 2 and Policies 1A and 1B) identifies Strategic Development Areas for as the main focus for future growth. Within East Lothian, the 'East Coast' sub-region is identified as an SDA, which focuses growth towards the A1 and East Coast Main Line. Port Seton is within the East Coast SDA.

2.3 An underlying principle of SESplan's Spatial Strategy is that in the selection of new development sites to meet its requirements, existing allocated sites must be carried forward and these existing allocations must be complemented by and must not be undermined by new land allocations. SESplan Policy 1A requires LDP's to indicate phasing and mix of uses appropriate to secure the delivery and provision of infrastructure to accommodate development.

### National Planning Framework 3

2.4 NPF3 expects East Lothian to experience one of the highest levels of population growth in the country over the next 20 years and beyond.

2.5 Housing requirements around Edinburgh are expected to be high and NPF3 identifies that the SESplan area has the second highest level of predicted population and household growth. Within Edinburgh and South East Scotland, NPF3 is clear that it expects SESplan to make a concerted effort to deliver a generous amount of housing land. NPF requires, 'targeted action to better match demand for land with infrastructure capacity.' Within city regions infrastructure capacity is limited and the Scottish Government expects planning authorities, developers, government agencies and infrastructure providers to remove these constraints. The utilisation of existing infrastructure is preferred and strategic thinking, partnership working and innovation are expected (pages 7 and 13).

### Scottish Planning Policy (2014)

2.6 SPP puts in place a presumption in favour of development, which contributes to sustainable development. It places a particular emphasis on the delivery of a generous supply of housing and good 'placemaking' in so doing.

## 3. The Port Seton Links Site

3.1 The site is currently utilised as a paddock/rough grazing, and is adjacent to the existing eastern urban edge of Port Seton, fronting on to the B1348 Links Road. It has an area of approximately 2.72ha and might accommodate up to 90 houses. It slopes gently upward inland and is well contained on both its eastern and western boundaries by mixed coniferous and deciduous woodland. Running up the western boundary is a public right of way leading to Seton House and locations around and beyond. Beyond the eastern boundary is Seton Sands Holiday Park.

3.2 The southern boundary is delineated by a fence, and beyond that open rough pasture. Further south are the policies of Seton House and the Collegiate Church which are on higher land. From the south of the subject land there are limited views towards Seton House, which is surrounded by woodland. Historically, before this woodland grew to its current height, and before Port Seton and Seton Sands were developed to their current extent, Seton House would probably have had uninterrupted views towards the Firth of Forth. This is no longer the case, and the role of the subject land in terms of providing a setting for Seton House is insignificant.

3.3 The site is within walking distance of the town centre and there are bus stops close by with services to Musselburgh and Edinburgh. Access to the site would be from the B1348, which is relatively straight in this location, with no impediments to visibility for cars that would enter and leave the site.

3.4 The site has not been previously developed and the owner is not aware of any contamination or land instability.

3.5 The Landscape Assessment (Appendix 2) shows a conceptual layout of the site.

## 4. Conclusions

4.1 The Port Seton Links site is well suited to accommodate an appropriate residential development. The site is relatively flat, with good access available on to the Links Road, and a spectacular outlook over the Firth of Forth. It represents a relatively small and logical extension to Port Seton, which is a small but vibrant town.

4.2 Port Seton is within the East Coast Strategic Development Area, which is identified as a focus for housing development in SESplan. Moreover, development of the site is consistent with the LDP's 'Compact Growth' strategy, which seeks to focus most development towards the west of the Strategic Development Area.

4.3 There is a significant shortfall of housing identified in the Proposed LDP relative to the SESplan requirement as identified in our separate housing supply and demand representation. Additional housing sites therefore require to be identified, and this particular site is ideally suited.

## Proposed Modification

Allocate the Port Seton Links for residential development through inclusion of a new proposal and identification of the site on the Proposals Map.

### 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:

**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):

**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:

We recommend that LDP Table HOU2 is replaced by a new table, reflecting the correct methodology outlined in this representation. Revised table will be emailed in a separate document with supporting appendix 1 to [ldp@eastlothian.gov.uk](mailto:ldp@eastlothian.gov.uk)

**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):

The text of this representation will be emailed in a separate document with supporting appendix 1 to [ldp@eastlothian.gov.uk](mailto:ldp@eastlothian.gov.uk). The representation also addresses housing supply and demand but comment is made in response to Q2 as the modification sought relates to Table Hou2, which is under the heading of 'Established Housing Land Supply.'

## 1. Introduction

1.1 This report considers issues relating to housing supply and demand and the adequacy of the approach set out in the East Lothian Council's Proposed LDP in addressing the requirements of SESplan, its related Supplementary Guidance and Scottish Planning Policy.

1.2 As described below, the LDP does not allocate sufficient housing land to be consistent with these documents as there are not enough housing sites identified to meet the housing building requirements identified in SESplan and the Supplementary Guidance. Consequently, there is a need to allocate additional sites in the LDP.

## 2. SESplan and Supplementary Guidance

2.1 SESplan is the Strategic Development Plan (SDP), which was approved in 2013. Policy 5 (Housing Land) explains that for the period from 2009 up to 2024, there is a requirement for sufficient housing land to be allocated so as to enable 107,545 houses to be built in the SESplan area. Moreover, it indicates that the requirement for the period 2009 to 2019 is for 74,835 houses. It then goes on to say that:

"Supplementary Guidance will be prepared to provide detailed further information for Local Development Plans as to how much of that requirement should be met in each of those six areas, both in the period 2009 – 2019 and in the period 2019 to 2024"

2.2 The Supplementary Guidance was approved in October 2014. Table 3.1 of the SG sets the Housing Land Requirement by Local Development Plan Area, which for East Lothian is:

2009 – 2019: 6,250

2019 – 2024: 3,800

2.3 It is important to note that the preparation of the SG was before the publication of revised Scottish Planning Policy in 2014, which replaced SPP 2010. The revised SPP amended the terminology in regard to housing 'requirements'.

2.4 Paragraph 70 of SPP 2010 explained the term 'housing requirement' as follows:

The scale, nature and distribution of the housing requirement for an area identified in the local housing strategy and development plan should be based on the outcome of the housing need and demand assessment. Wider strategic economic, social and environmental policy objectives should also be taken into account when determining the scale and distribution of the housing requirement and the housing supply target for an area. Planning authorities may, as part of the development plan settlement strategy, direct development to particular locations to achieve desired policy outcomes. In such circumstances the planned level or direction of growth may not reflect past trends.

2.5 Thus, the 'housing requirement' as defined in SPP 2010, represents a 'policy view' of the amount of housing that requires to be delivered, taking into account economic, social and environmental matters, which is analogous to the description of the 'housing supply target' in SPP 2014 as described in paragraph 115 of SPP:

"The housing supply target is a policy view of the number of homes the authority has agreed will be delivered in each housing market area over the periods of the development plan and local housing strategy, taking into account wider economic, social and environmental factors, issues of capacity, resource and deliverability, and other important requirements such as the aims of National Parks. The target should be reasonable, should properly reflect the HNDA estimate of housing demand in the market sector, and should be supported by compelling evidence. The authority's housing supply target should also be reflected in the local housing strategy."

2.6 SPP 2014 redefines the meaning of the term 'housing requirement' in paragraph 116 as follows:

"Within the overall housing supply target, plans should indicate the number of new homes to be built over the plan period. This figure should be increased by a margin of 10 to 20% to establish the housing land requirement, in order to ensure that a generous supply of land for housing is provided. The exact extent of the

margin will depend on local circumstances, but a robust explanation for it should be provided in the plan.”

2.7 SESplan and its Supplementary Guidance do not use the term 'housing supply target', but it is clear that references in those documents to 'housing requirement' are in effect equivalent to a 'housing supply target'. To accord with SPP, this means that a margin of 10% to 20% needs to be added to the housing requirements identified in the Supplementary Guidance. However, it is apparent from the commentary in Proposed LDP Technical Note 1 that the Council does not agree with this conclusion and that it considers that no generosity margin is required.

2.8 This conclusion is in our view inconsistent with Scottish Planning Policy definitions. It is also inconsistent with view reached by the Examination Report for the Edinburgh LDP, which concluded in paragraph 8 on page 128 that:

“The housing supply target is based on the HNDA but is a policy view of the number of homes that are needed by local authority area. SESplan predates current Scottish Planning Policy so does not use the word target but refers to housing requirements and housing land requirements. However for the purposes of the examination there is nothing to suggest to me that the figures in SESplan should not be interpreted as the target. Paragraph 108 of the strategic plan clarifies the plan's role to ensure that the areas overall assessed housing requirements can be met by new house completions. SESplan clarifies that some of the housing demand generated by the city will be accommodated in the wider city region. The local development plan is required to demonstrate consistency with the Strategic Development Plan. The housing target as set through SESplan and its associated supplementary guidance is already approved and not a matter for this examination.”

2.9 Paragraphs 18 and 19 on page 130 of the Examination report go on to say:

“Paragraph 116 of Scottish Planning Policy states that within the overall housing supply target, plans should indicate the number of new homes to be built over the plan period. This figure should be increased by a margin of 10 - 20% to establish the housing land requirement so that a generous supply of land for housing is provided. The exact extent of the margin will depend on local circumstances, but a robust explanation for it should be provided in the plan.

In this case such a margin was not included in the strategic plan which pre-dates the current Scottish Planning Policy. Instead the flexibility is added to obtain the housing land requirement for this local development plan. The proposed plan applies a margin of 10% flexibility as indicated in the table below. I return to the matter of the sufficiency of this margin and whether it should be increased below.”

2.10 Thus, to be clear, the East Lothian LDP must provide sufficient housing land to meet the targets identified in the SESplan Supplementary Guidance to allow the specified number of houses to be built within both periods identified. There is no 'generosity' included within the housing requirement identified in SESplan, and this should therefore be identified in the LDP.

2.11 The following section assesses the adequacy of the housing land supply contained in the Proposed LDP against the requirements of SESplan, its Supplementary guidance and Scottish Planning Policy.

### 3. East Lothian Housing Land Requirement

3.1 Section text Paragraph 110 of Scottish Planning Policy identifies the following policy principle:

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

3.2 Paragraph 119 of SPP also indicates that:

“Local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption.”

3.3 The correct approach to be taken in the LDP can therefore be summarised as follows.

1. The identification of the two consecutive housing requirements (supply targets) established by the SESplan Supplementary Guidance for the periods 2009 – 2019 and 2019 – 2024.

2. The identification of a third housing requirement for the period 2024 – 2028 to provide sufficient housing land to meet the requirement to year 10 from the expected year of adoption (i.e. 2018).

3. The SESplan housing requirement (supply target) should be increased by a margin of 10 to 20% to establish the housing land requirement, in order to ensure that a generous supply of land is provided (SPP paragraph 116).

4. The LDP should make provision for sufficient houses to be built to meet the housing land requirement in the two time periods under consideration. This is likely to include the following sources of housing:

- House completions to date
- Land contained in the established land supply
- Windfall
- New housing allocations
- Demolitions (subtract)

3.4 Table HOU2 of the Proposed LDP summarises the Council's approach to meeting the SESplan housing requirement. In our view, Table HOU2 is flawed for the following reasons:

- Although Table HOU2 correctly identifies the SESplan housing requirements for 2009 – 2019 and 2019 – 2024, it does not set out the requirement for the period 2024 – 2028, which would cover the remainder of the 10-year period from LDP adoption in 2018 as required by SPP paragraph 119. Instead LDP Table HOU2 identifies two columns for the period 2024 – 2032 and Beyond 2032. Interesting as this information may be, it is not a consideration required by Scottish Planning Policy.
- Table HOU2 does not apply a margin of generosity to each of the SESplan housing requirements. Instead, the final line simply identifies the percentage generosity for the period 2009 – 2024 combined, based on the assumption that the figures given for contributions from the new allocations are correct.
- The assumptions for the programming of house completions from the new allocations are clearly over-optimistic in terms of when sites will begin to be

developed. The effect of this is to produce an unrealistically high contribution to meeting the housing requirement in the period 2019 – 2024.

3.5 We have therefore prepared a revised version of Table HOU2, which is contained in Appendix 1 to this document. This revised table contain two variants, the first assuming 10% generosity and the second 20%. We have numbered the lines of our Tables from 1 – 12. This is the same number of lines as the LDP version of the Table, but instead of the bottom line identifying a percentage generosity, we have inserted a new Line 3, which adds generosity for each phase of the housing requirement separately. It should also be noted that our Tables replace the two columns showing the housing requirement for the periods 2024 – 2032 and Beyond 2032, with a single column for the period 2024 – 2028, reflecting the requirements of SPP. As a consequence of this, we have retitled Line 2 (and Line 3) to refer to the SDP as well as the SDP.

3.6 To explain the derivation of each line:

3.7 Line 1 of LDP Table HOU2 correctly identifies SDP housing requirement periods in the two consecutive periods 2009 – 2019 and 2019 – 2024. However, our Tables go on to identify a third period from 2024 – 2028 as explained above.

3.8 Line 2 of LDP Table HOU2 correctly identifies the housing requirements of the SESplan Supplementary Guidance for the two time periods. In our HOU2 Tables, we have derived the requirement/target for the period 2024 – 2028 as well by extrapolating from the first 2 periods. For the first two phases, East Lothian's total housing requirement is 9.3% of the SESplan total. If this percentage is applied to the period 2024 – 2032, for which the SESplan total requirement is 47,999 homes, the East Lothian requirement for that period would be 4,464. Pro-rata for the period 2024 – 2028, this is 2,232 homes. This is a different methodology from that used in the LDP Table HOU2 for the period 2024 – 2032, which is derived from the SESplan HNDA for East Lothian over that period. In our view, this approach is not correct because it does not take into account the fact that the basis of SESplan's housing land requirements is to redistribute a significant proportion of Edinburgh's housing need and demand, as reflected in the requirements of the first two phases to 2024. A similar approach should therefore be taken to the third phase.

3.9 Line 3 of Table HOU2 identifies house completions from 2009 – 2015, which is as it should be.

3.10 Line 3 of our Tables HOU2 'A' and HOU2 'B' add 10% and 20% generosity margins respectively to the figures in Line 2.

3.11 As indicated above, paragraph 116 of SPP indicates that the generosity margin should be somewhere between 10% and 20% and a robust explanation given for the figure chosen. The Council disagrees that there should be any generosity provided, which is in our view both contrary to Scottish Planning Policy and illogical. This is because concept of generosity relates to the almost certain likelihood that not all of the housing land identified as effective will actually deliver completions. Consequently, the figures for housing land supply given in Table HOU2 will almost certainly be over-estimates. That is why SPP requires more than enough land to be allocated in LDPs. The question then, is what level of generosity is required? This, we accept, is difficult to judge.

3.12 One approach is to consider the past record of a Council in accurately predicting the delivery of the effective land supply. In 2008, Turley Associates undertook research for the Scottish Government entitled 'The Effectiveness of Housing Land Audits in Monitoring Housing Land Supply in Scotland', which formed part of the research base for PAN 2/2010. This research assessed the predictive accuracy of housing land audits and found that for East Lothian, over a 5- year period from 2001 – 2006, 55% of the effective housing land supply was not actually developed within this period. Similar outcomes were obtained for many audits across Scotland. Although we appreciate this is now quite an elderly piece of work, our experience is that the predictive estimates of the effective housing land supply in audits continue to be too optimistic, and the failure rate in most cases is likely to be more than 10% and often greater than 20%. To be more precise would require significant up to date research.

3.13 We therefore strongly recommend that East Lothian Council reviews the recent track record of its housing land audits in predicting actual delivery, and sets a margin of generosity which reflects this.

3.14 We agree with the figures provided for dwelling completions and contributions from the established land supply in Lines 3 & 4 of LDP Table HOU2, and these are repeated in Lines 4 & 5 of our tables.

3.15 Line 5 of LDP Table HOU2 identifies the contributions from new allocations. These figures are derived from the yearly programming contained in Appendix 2 of LDP Technical Note 1, and have been prepared by East Lothian Council. Although we do not take significant issue with the predicted number of yearly house completions in an improving market, we seriously question the 'blanket' approach of assuming that the vast majority of new allocations will deliver houses from next year onwards. This may be the case for some sites which already have planning permission (but even this is optimistic for many of those sites). However, for sites which do not yet have permission or are not yet subject to a planning application, this assumption will be impossible to achieve. It should be noted, for example, that in Musselburgh there is a requirement for a new secondary school and new primary schools, which will take a number of years to be operational. We are not aware that there is any specifically identified interim educational capacity, which means that there may be no significant development until post 2020.

3.16 In our view, the Council therefore needs to reappraise its delivery timescales for new housing sites, in consultation with the housebuilding industry and in the light of up to date information in respect to each site. This should be done as soon as possible and certainly before the Examination of the Plan, to provide the Reporter with the best estimate of housing delivery.

3.17 In the meantime it would be reasonable to assume that the programming of sites shown in Appendix 2 of LDP Technical Note 1, be deferred by one year. This is the approach taken in the our revised HOU2 Tables.

3.18 Lines 6 & 7 of LDP Table HOU2 identify contributions from windfall sites and loss of supply arising from demolitions. We agree with these figures and they are reflected in our HOU2 Tables.

3.19 Line 9 of LDP Table HOU2 identifies contributions from Blindwells, which we agree with, other than for a reduction in the delivery contribution in the period 2024 – 2028, as compared to the longer period 2024 – 2032 contained in LDP Table HOU2.

3.20 Line 11 on our tables shows the Grand Total Housing Land Supply. The differences between the Council's figures and our own are due to the deferral of

new site programming by one year and our identification of the relevant period from 2024 – 2028, rather than to 2032 and beyond.

3.21 Line 12 of our revised Tables is equivalent to Line 11 of LDP Table HOU2, which identifies the shortfall/surplus of supply against the requirement. Clearly, there are significant differences between the conclusions reached.

3.22 LDP Table HOU2 concludes that the LDP allocates a significant surplus of housing land in the first and second periods, and a significant deficit in the third and fourth periods.

3.23 Our Revised Table A shows a significant shortfall in the first period, a significant surplus in the second period and a significant deficit in the third period. Our Revised Table B identifies even greater deficits in the first and third periods and a smaller surplus in the second period as compared to Table A.

3.24 The methodology employed to produce revised Tables A & B is consistent with SESplan, the SESplan Supplementary Guidance and the terms of Scottish Planning Policy. LDP Table HOU2, on the other hand, is flawed for the reasons given above.

3.25 SESplan Policy 5 is clear that land is required to be allocated in LDPs to meet the requirements for each of the consecutive time periods such that all of these houses can be built. This itself implies that more than enough land (i.e. a generous amount) needs to be allocated.

3.26 Table A identifies a shortfall of 1,308 homes to meet the Sesplan Policy 5 housing requirement + 10% from 2009 – 2019. Table B shows a shortfall of 1,933 homes in the same period if generosity of 20% is required. Even if there is no generosity applied, the shortfall is 683 homes.

#### 4. Conclusion

4.1 Our revised Tables are, in our view, based on the correct methodology, deriving from the content of SESplan and Scottish Planning Policy. In respect to 'generosity' we have produced two variant tables, one assuming 10% and the other 20%. As indicated above, we recommend that East Lothian Council undertakes additional work to assess what the appropriate level of generosity should be, between these two limits.

4.2 We recommend that LDP Table HOU2 is replaced by a new table, reflecting the correct methodology outline in this representation.

**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:**

**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):**

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

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

**Modifications(s) Sought:**

1. Delete Policy DC8 Countryside Around Towns from the LDP.
2. If deletion of Policy DC8 is not agreed, then delete the DC8 designation from Port Seton Links.

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

The text of this representation will be emailed in a separate document with supporting appendix 1 to [ldp@eastlothian.gov.uk](mailto:ldp@eastlothian.gov.uk)

1.1 The Proposed LDP includes a new designation – Countryside Around Towns - which would give special status to specific areas of land in locations around towns and villages in East Lothian. It includes the Port Seton Links site (Appendix 1) to the east of Port Seton.

1.2 We disagree with both the principle of this policy and, more specifically, the inclusion of the Port Seton Links site within the Countryside Around Towns designation.

1.3 Paragraph 5.20 of the Proposed LDP states:

"There are a number of areas beyond the Edinburgh Green Belt that are also subject to development pressure but should be retained as open or undeveloped. Countryside Around Town designations will apply and their objectives will be to conserve the landscape setting, character or identity of certain towns and villages."

1.4 The related Policy DC8 goes on to state:

Development that would harm Countryside Around Towns objectives as defined in supplementary planning guidance once adopted will not be permitted. New development within areas designated as Countryside Around Towns will be supported in principle only where:

- i) it is required to implement part of the green network strategy as defined by that strategy;
  - ii) it is required for community uses;
  - iii) it is required for rural business, tourism or leisure related use;
  - iv) it is essential infrastructure that has a clear operational requirement for that particular location and there is no other suitable site available; or
- Any new development must not harm the landscape setting of the countryside location and must be of a scale, size and form that would not harm the objectives for the countryside around towns designation.

1.5 In essence, therefore, this policy is intended to apply to areas of landscape importance. It is therefore not clear why the designation is required, as important landscapes and townscapes are already defined by the Area of Great Landscape Value and Conservation Area designations.

1.6 The text of the LDP Main Issues Report indicated that CAT designations are appropriate because it was not appropriate to extend the Green Belt any further into East Lothian, and this suggests that the purpose of CAT is simply to replicate Green Belt policy by another name. This, in our view, is wholly inappropriate, and contrary to the spirit of Scottish Planning Policy. Paragraph 49 of SPP says that for most settlements, a green belt is not necessary as other policies can provide an appropriate basis for directing development.

1.7 More specifically, we do not consider that the Port Seton Links site has any particular qualities that make it special. It is a visually well-contained site on the eastern edge of Port Seton, and adjacent to Seton Sands Holiday Park. We note that it forms part of a much larger area identified as CAT to the north, but it is not made clear why the subject land is considered appropriate for the CAT designation. We could speculate that there may be concern that development of the site might result in coalescence between Port Seton and Seton Sands. This may be the perception if one views the site on plan, where it presents a gap between the edge of the town and the caravan park. However, when viewed on site, the site is too narrow to present any significant visual gap. There is also a strong woodland buffer to the east of the site which will prevent any sense of coalescence.

CWP on behalf of

Mr A P Dale and Mr R F Dale

**Port Seton Links**

**Representation to the East Lothian Local Development Plan**

**To Support an Allocation for Residential Development**

23<sup>rd</sup> October 2016

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## **1. Introduction**

- 1.1 This representation has been prepared on behalf of Mr A P Dale and Mr R F Dale in response to the East Lothian Proposed Local Development Plan (LDP). It relates to land immediately east of Port Seton, between Port Seton and Seton Sands. The site is shown in Appendix 1 accompanying this representation, and in our view it should be allocated for residential use in the Local Development Plan. The site has a capacity of up to 90 homes.
- 1.2 Port Seton is within the East Coast Strategic Development Area identified in SESplan, and is therefore considered in general terms to be a sustainable location for new housing development, relatively close to Edinburgh and a good strategic transport network.
- 1.3 Our separate representation in respect to Housing Supply & Demand concludes that the Proposed LDP does not identify enough housing sites to meet the SESplan housing requirements for East Lothian. Consequently, additional housing sites will need to be allocated, and we recommend that Port Seton Links is one of these.
- 1.4 The site is proposed to be subject to the Proposed LDP's new Countryside Around Towns policy. We do not agree with the principle of this policy, but even if it is adopted we do not consider it to be relevant to this site. We have made a separate representation to this effect.
- 1.5 As explained in the Landscape Assessment of the site accompanying this representation (Appendix 2), the site can be developed for housing without harming the character of the area.



## 2. Planning Policy Context

### *SESplan*

- 2.1 The East Lothian Local Development Plan must conform to the Strategic Development Plan for the Edinburgh and South East Scotland area (SESplan) and its Supplementary Guidance. The MIR states that to conform to SESplan, the LDP must allocate land sites for 6,250 houses for the period 2009 to 2019 and 3,800 houses for the period 2019 to 2024.
- 2.2 SESplan's Spatial Strategy and policies (Figures 1 and 2 and Policies 1A and 1B) identifies Strategic Development Areas for as the main focus for future growth. Within East Lothian, the 'East Coast' sub-region is identified as an SDA, which focuses growth towards the A1 and East Coast Main Line. Port Seton is within the East Coast SDA.
- 2.3 An underlying principle of SESplan's Spatial Strategy is that in the selection of new development sites to meet its requirements, existing allocated sites must be carried forward and these existing allocations must be complemented by and must not be undermined by new land allocations. SESplan Policy 1A requires LDP's to indicate phasing and mix of uses appropriate to secure the delivery and provision of infrastructure to accommodate development.

### *National Planning Framework 3*

- 2.4 NPF3 expects East Lothian to experience one the highest levels of population growth in the country over the next 20 years and beyond.
- 2.5 Housing requirements around Edinburgh are expected to be high and NPF3 identifies that the SESplan area has the second highest level of predicted population and household growth. Within Edinburgh and South East Scotland, NPF3 is clear that it expects SESplan to make a concerted effort to deliver a generous amount of housing land. NPF requires, 'targeted action to better match demand for land with infrastructure capacity.' Within city regions infrastructure capacity is limited and the Scottish Government expects planning authorities, developers, government agencies and infrastructure providers to remove these constraints. The utilisation of existing infrastructure is preferred and strategic thinking, partnership working and innovation are expected (pages 7 and 13).

### *Scottish Planning Policy (2014)*

- 2.6 SPP puts in place a presumption in favour of development, which contributes to sustainable development. It places a particular emphasis on the delivery of a generous supply of housing and good 'placemaking' in so doing.

### **3. The Port Seton Links Site**

- 3.1 The site is currently utilised as a paddock/rough grazing, and is adjacent to the existing eastern urban edge of Port Seton, fronting on to the B1348 Links Road. It has an area of approximately 2.72ha and might accommodate up to 90 houses. It slopes gently upward inland and is well contained on both its eastern and western boundaries by mixed coniferous and deciduous woodland. Running up the western boundary is a public right of way leading to Seton House and locations around and beyond. Beyond the eastern boundary is Seton Sands Holiday Park.
- 3.2 The southern boundary is delineated by a fence, and beyond that open rough pasture. Further south are the policies of Seton House and the Collegiate Church which are on higher land. From the south of the subject land there are limited views towards Seton House, which is surrounded by woodland. Historically, before this woodland grew to its current height, and before Port Seton and Seton Sands were developed to their current extent, Seton House would probably have had uninterrupted views towards the Firth of Forth. This is no longer the case, and the role of the subject land in terms of providing a setting for Seton House is insignificant.
- 3.3 The site is within walking distance of the town centre and there are bus stops close by with services to Musselburgh and Edinburgh. Access to the site would be from the B1348, which is relatively straight in this location, with no impediments to visibility for cars that would enter and leave the site.
- 3.4 The site has not been previously developed and the owner is not aware of any contamination or land instability.
- 3.5 The Landscape Assessment (Appendix 2) shows a conceptual layout of the site.

### **4. Conclusions**

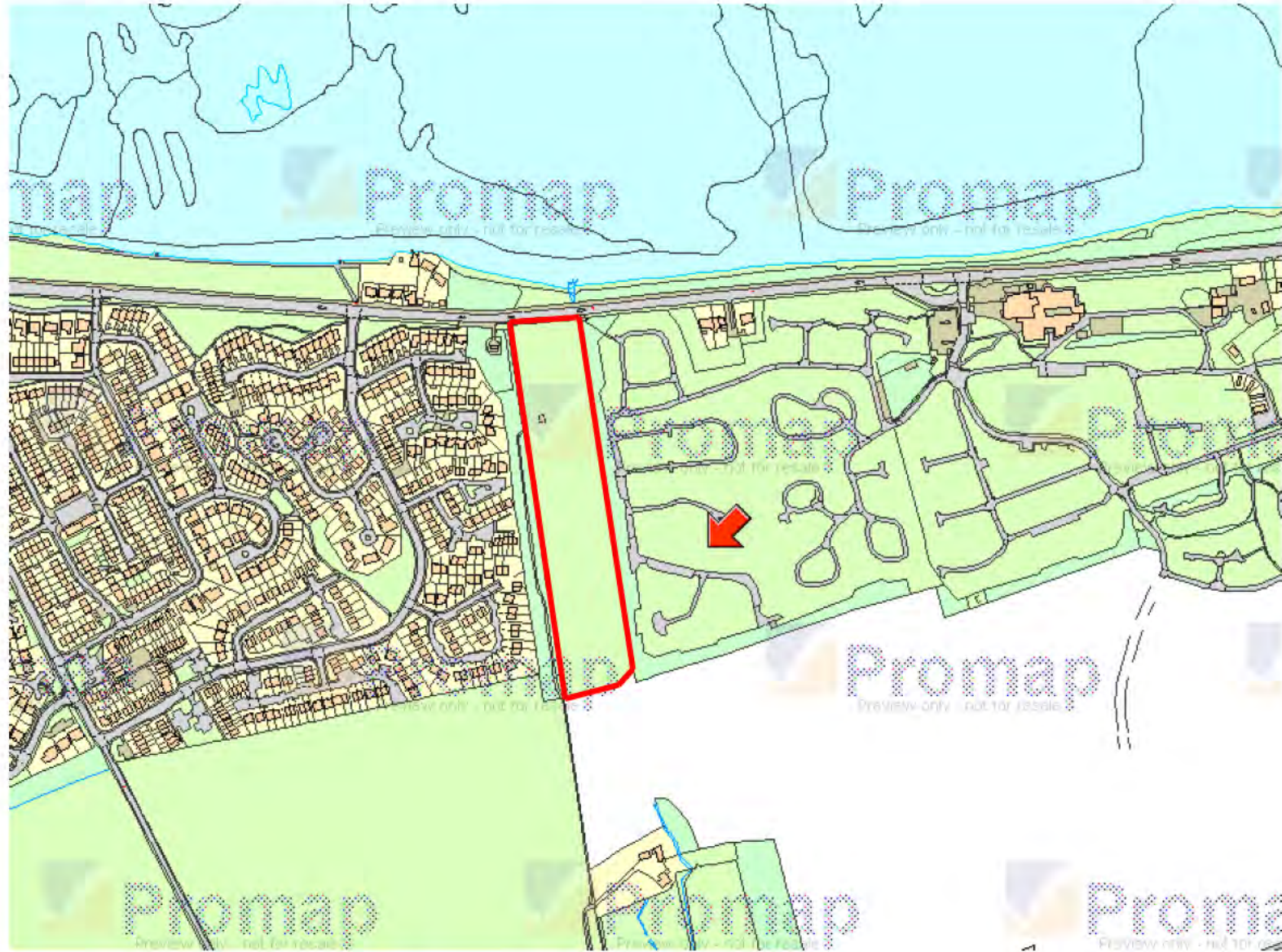
- 4.1 The Port Seton Links site is well suited to accommodate an appropriate residential development. The site is relatively flat, with good access available on to the Links Road, and a spectacular outlook over the Firth of Forth. It represents a relatively small and logical extension to Port Seton, which is a small but vibrant town.
- 4.2 Port Seton is within the East Coast Strategic Development Area, which is identified as a focus for housing development in SESplan. Moreover, development of the site is consistent with the LDP's 'Compact Growth' strategy, which seeks to focus most development towards the west of the Strategic Development Area.

4.3 There is a significant shortfall of housing identified in the Proposed LDP relative to the SESplan requirement as identified in our separate housing supply and demand representation. Additional housing sites therefore require to be identified, and this particular site is ideally suited.

**Proposed Modification**

Allocate the Port Seton Links for residential development through inclusion of a new proposal and identification of the site on the Proposals Map.

Site Plan – Port Seton Links



# East Lothian Local Development Plan

## Housing Supply & Demand

Date: 4 November 2016

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Appendix 1: Revised Table HOU2





## **1. Introduction**

- 1.1 This report considers issues relating to housing supply and demand and the adequacy of the approach set out in the East Lothian Council's Proposed LDP in addressing the requirements of SESplan, its related Supplementary Guidance and Scottish Planning Policy.
- 1.2 As described below, the LDP does not allocate sufficient housing land to be consistent with these documents as there are not enough housing sites identified to meet the housing building requirements identified in SESplan and the Supplementary Guidance. Consequently, there is a need to allocate additional sites in the LDP.

## 2. SESplan and Supplementary Guidance

2.1 2.1SESplan is the Strategic Development Plan (SDP), which was approved in 2013. Policy 5 (Housing Land) explains that for the period from 2009 up to 2024, there is a requirement for sufficient housing land to be allocated so as to enable 107,545 houses to be built in the SESplan area. Moreover, it indicates that the requirement for the period 2009 to 2019 is for 74,835 houses. It then goes on to say that:

***“Supplementary Guidance will be prepared to provide detailed further information for Local Development Plans as to how much of that requirement should be met in each of those six areas, both in the period 2009 – 2019 and in the period 2019 to 2024”***

2.2 The Supplementary Guidance was approved in October 2014. Table 3.1 of the SG sets the Housing Land Requirement by Local Development Plan Area, which for East Lothian is:

2009 – 2019:       **6,250**

2019 – 2024:       **3,800**

2.3 It is important to note that the preparation of the SG was before the publication of revised Scottish Planning Policy in 2014, which replaced SPP 2010. The revised SPP amended the terminology in regard to housing ‘requirements’.

2.4 Paragraph 70 of SPP 2010 explained the term ‘housing requirement’ as follows:

**The scale, nature and distribution of the housing requirement for an area identified in the local housing strategy and development plan should be based on the outcome of the housing need and demand assessment. Wider strategic economic, social and environmental policy objectives should also be taken into account when determining the scale and distribution of the housing requirement and the housing supply target for an area. Planning authorities may, as part of the development plan settlement strategy, direct development to particular locations to achieve desired policy outcomes. In such circumstances the planned level or direction of growth may not reflect past trends.**

2.5 Thus, the ‘housing requirement’ as defined in SPP 2010, represents a ‘policy view’ of the amount of housing that requires to be delivered, taking into account economic, social and environmental matters, which is analogous to the description of the ‘housing supply target’ in SPP 2014 as described in paragraph 115 of SPP:

***“The housing supply target is a policy view of the number of homes the authority has agreed will be delivered in each housing market area over the periods of the development plan and local housing strategy, taking into account wider economic, social and environmental factors, issues of capacity, resource and deliverability, and other important requirements such as the aims of National Parks. The target should be reasonable, should properly reflect the HNDA estimate of housing demand in the market sector, and should be supported by compelling evidence. The authority’s housing supply target should also be reflected in the local housing strategy.”***

2.6 SPP 2014 redefines the meaning of the term ‘housing requirement’ in paragraph 116 as follows:

***“Within the overall housing supply target, plans should indicate the number of new homes to be built over the plan period. This figure should be increased by a margin of 10 to 20% to establish the housing land requirement, in order to ensure that a generous supply of land for housing is provided. The exact extent of the margin will depend on local circumstances, but a robust explanation for it should be provided in the plan.”***

2.7 SESplan and its Supplementary Guidance do not use the term ‘housing supply target’, but it is clear that references in those documents to ‘housing requirement’ are in effect equivalent to a ‘housing supply target’. To accord with SPP, this means that a margin of 10% to 20% needs to be added to the housing requirements identified in the Supplementary Guidance. However, it is apparent from the commentary in Proposed LDP Technical Note 1 that the Council does not agree with this conclusion and that it considers that no generosity margin is required.

2.8 This conclusion is in our view inconsistent with Scottish Planning Policy definitions. It is also inconsistent with view reached by the Examination Report for the Edinburgh LDP, which concluded in paragraph 8 on page 128 that:

***“The housing supply target is based on the HNDA but is a policy view of the number of homes that are needed by local authority area. SESplan predates current Scottish Planning Policy so does not use the word target but refers to housing requirements and housing land requirements. However for the purposes of the examination there is nothing to suggest to me that the figures in SESplan should not be interpreted as the target. Paragraph 108 of the strategic plan clarifies the plan’s role to ensure that the areas overall assessed housing requirements can be met by new house completions. SESplan clarifies that some of the housing demand generated by the city will be accommodated in the wider city region. The local development plan is required to demonstrate consistency with the Strategic Development Plan. The housing target as set through SESplan and its associated supplementary guidance is already approved and not a matter for this examination.”***

2.9 Paragraphs 18 and 19 on page 130 of the Examination report go on to say:

***“Paragraph 116 of Scottish Planning Policy states that within the overall housing supply target, plans should indicate the number of new homes to be built over the plan period. This figure should be increased by a margin of 10 - 20% to establish the housing land requirement so that a generous supply of land for housing is provided. The exact extent of the margin will depend on local circumstances, but a robust explanation for it should be provided in the plan.***

***In this case such a margin was not included in the strategic plan which pre-dates the current Scottish Planning Policy. Instead the flexibility is added to obtain the housing land requirement for this local development plan. The proposed plan applies a margin of 10% flexibility as indicated in the table below. I return to the matter of the sufficiency of this margin and whether it should be increased below.”***

2.10 Thus, to be clear, the East Lothian LDP must provide sufficient housing land to meet the targets identified in the SESplan Supplementary Guidance to allow the specified number of houses to

be built within both periods identified. There is no 'generosity' included within the housing requirement identified in SESplan, and this should therefore be identified in the LDP.

2.11 The following section assesses the adequacy of the housing land supply contained in the Proposed LDP against the requirements of SESplan, its Supplementary guidance and Scottish Planning Policy.

### 3. East Lothian Housing Land Requirement

3.1 Section text Paragraph 110 of Scottish Planning Policy identifies the following policy principle:

***“The planning system should identify a generous supply of housing land for each housing market area within the plan area to support the achievement of the housing requirement across all tenures, maintaining at least a 5-year supply of effective housing land at all times”***

3.2 Paragraph 119 of SPP also indicates that:

***“Local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption.”***

3.3 The correct approach to be taken in the LDP can therefore be summarised as follows.

1. The identification of the two consecutive housing requirements (supply targets) established by the SESplan Supplementary Guidance for the periods 2009 – 2019 and 2019 – 2024.
2. The identification of a third housing requirement for the period 2024 – 2028 to provide sufficient housing land to meet the requirement to year 10 from the expected year of adoption (i.e. 2018).
3. The SESplan housing requirement (supply target) should be increased by a margin of 10 to 20% to establish the housing land requirement, in order to ensure that a generous supply of land is provided (SPP paragraph 116).
4. The LDP should make provision for sufficient houses to be built to meet the housing land requirement in the two time periods under consideration. This is likely to include the following sources of housing:
  - House completions to date
  - Land contained in the established land supply
  - Windfall
  - New housing allocations
  - Demolitions (subtract)

3.4 Table HOU2 of the Proposed LDP summarises the Council’s approach to meeting the SESplan housing requirement. In our view, Table HOU2 is flawed for the following reasons:

- Although Table HOU2 correctly identifies the SESplan housing requirements for 2009 – 2019 and 2019 – 2024, it does not set out the requirement for the period 2024 – 2028, which would cover the remainder of the 10-year period from LDP adoption in 2018 as required by SPP paragraph 119. Instead LDP Table HOU2 identifies two columns for the

period 2024 – 2032 and Beyond 2032. Interesting as this information may be, it is not a consideration required by Scottish Planning Policy.

- Table HOU2 does not apply a margin of generosity to each of the SESplan housing requirements. Instead, the final line simply identifies the percentage generosity for the period 2009 – 2024 combined, based on the assumption that the figures given for contributions from the new allocations are correct.
- The assumptions for the programming of house completions from the new allocations are clearly over-optimistic in terms of when sites will begin to be developed. The effect of this is to produce an unrealistically high contribution to meeting the housing requirement in the period 2019 – 2024.

3.5 We have therefore prepared a revised version of Table HOU2, which is contained in Appendix 1 to this document. This revised table contain two variants, the first assuming 10% generosity and the second 20%. We have numbered the lines of our Tables from 1 – 12. This is the same number of lines as the LDP version of the Table, but instead of the bottom line identifying a percentage generosity, we have inserted a new Line 3, which adds generosity for each phase of the housing requirement separately. It should also be noted that our Tables replace the two columns showing the housing requirement for the periods 2024 – 2032 and Beyond 2032, with a single column for the period 2024 – 2028, reflecting the requirements of SPP. As a consequence of this, we have retitled Line 2 (and Line 3) to refer to the SDP as well as the SDP.

3.6 To explain the derivation of each line:

3.7 Line 1 of LDP Table HOU2 correctly identifies SDP housing requirement periods in the two consecutive periods 2009 – 2019 and 2019 – 2024. However, our Tables go on to identify a third period from 2024 – 2028 as explained above.

3.8 Line 2 of LDP Table HOU2 correctly identifies the housing requirements of the SESplan Supplementary Guidance for the two time periods. In our HOU2 Tables, we have derived the requirement/target for the period 2024 – 2028 as well by extrapolating from the first 2 periods. For the first two phases, East Lothian’s total housing requirement is 9.3% of the SESplan total. If this percentage is applied to the period 2024 – 2032, for which the SESplan total requirement is 47,999 homes, the East Lothian requirement for that period would be 4,464. Pro-rata for the period 2024 – 2028, this is **2,232 homes**. This is a different methodology from that used in the LDP Table HOU2 for the period 2024 – 2032, which is derived from the SESplan HNDA for East Lothian over that period. In our view, this approach is not correct because it does not take into account the fact that the basis of SESplan’s housing land requirements is to redistribute a significant proportion of Edinburgh’s housing need and demand, as reflected in the requirements of the first two phases to 2024. A similar approach should therefore be taken to the third phase.

3.9 Line 3 of Table HOU2 identifies house completions from 2009 – 2015, which is as it should be.

3.10 Line 3 of our Tables HOU2 ‘A’ and HOU2 ‘B’ add 10% and 20% generosity margins respectively to the figures in Line 2.



- 3.11 As indicated above, paragraph 116 of SPP indicates that the generosity margin should be somewhere between 10% and 20% and a robust explanation given for the figure chosen. The Council disagrees that there should be any generosity provided, which is in our view both contrary to Scottish Planning Policy and illogical. This is because concept of generosity relates to the almost certain likelihood that not all of the housing land identified as effective will actually deliver completions. Consequently, the figures for housing land supply given in Table HOU2 will almost certainly be over-estimated. That is why SPP requires more than enough land to be allocated in LDPs. The question then, is what level of generosity is required? This, we accept, is difficult to judge.
- 3.12 One approach is to consider the past record of a Council in accurately predicting the delivery of the effective land supply. In 2008, Turley Associates undertook research for the Scottish Government entitled 'The Effectiveness of Housing Land Audits in Monitoring Housing Land Supply in Scotland', which formed part of the research base for PAN 2/2010. This research assessed the predictive accuracy of housing land audits and found that for East Lothian, over a 5- year period from 2001 – 2006, 55% of the effective housing land supply was not actually developed within this period. Similar outcomes were obtained for many audits across Scotland. Although we appreciate this is now quite an elderly piece of work, our experience is that the predictive estimates of the effective housing land supply in audits continue to be too optimistic, and the failure rate in most cases is likely to be more than 10% and often greater than 20%. To be more precise would require significant up to date research.
- 3.13 We therefore strongly recommend that East Lothian Council reviews the recent track record of its housing land audits in predicting actual delivery, and sets a margin of generosity which reflects this.
- 3.14 We agree with the figures provided for dwelling completions and contributions from the established land supply in Lines 3 & 4 of LDP Table HOU2, and these are repeated in Lines 4 & 5 of our tables.
- 3.15 Line 5 of LDP Table HOU2 identifies the contributions from new allocations. These figures are derived from the yearly programming contained in Appendix 2 of LDP Technical Note 1, and have been prepared by East Lothian Council. Although we do not take significant issue with the predicted number of yearly house completions in an improving market, we seriously question the 'blanket' approach of assuming that the vast majority of new allocations will deliver houses from next year onwards. This may be the case for some sites which already have planning permission (but even this is optimistic for many of those sites). However, for sites which do not yet have permission or are not yet subject to a planning application, this assumption will be impossible to achieve. It should be noted, for example, that in Musselburgh there is a requirement for a new secondary school and new primary schools, which will take a number of years to be operational. We are not aware that there is any specifically identified interim educational capacity, which means that there may be no significant development until post 2020.

- 3.16 In our view, the Council therefore needs to reappraise its delivery timescales for new housing sites, in consultation with the housebuilding industry and in the light of up to date information in respect to each site. This should be done as soon as possible and certainly before the Examination of the Plan, to provide the Reporter with the best estimate of housing delivery.
- 3.17 In the meantime it would be reasonable to assume that the programming of sites shown in Appendix 2 of LDP Technical Note 1, be deferred by one year. This is the approach taken in the our revised HOU2 Tables.
- 3.18 Lines 6 & 7 of LDP Table HOU2 identify contributions from windfall sites and loss of supply arising from demolitions. We agree with these figures and they are reflected in our HOU2 Tables.
- 3.19 Line 9 of LDP Table HOU2 identifies contributions from Blindwells, which we agree with, other than for a reduction in the delivery contribution in the period 2024 – 2028, as compared to the longer period 2024 – 2032 contained in LDP Table HOU2.
- 3.20 Line 11 on our tables shows the Grand Total Housing Land Supply. The differences between the Council's figures and our own are due to the deferral of new site programming by one year and our identification of the relevant period from 2024 – 2028, rather than to 2032 and beyond.
- 3.21 Line 12 of our revised Tables is equivalent to Line 11 of LDP Table HOU2, which identifies the shortfall/surplus of supply against the requirement. Clearly, there are significant differences between the conclusions reached.
- 3.22 LDP Table HOU2 concludes that the LDP allocates a significant surplus of housing land in the first and second periods, and a significant deficit in the third and fourth periods.
- 3.23 Our Revised Table A shows a significant shortfall in the first period, a significant surplus in the second period and a significant deficit in the third period. Our Revised Table B identifies even greater deficits in the first and third periods and a smaller surplus in the second period as compared to Table A.
- 3.24 The methodology employed to produces revised Tables A & B is consistent with SESplan, the SESplan Supplementary Guidance and the terms of Scottish Planning Policy. LDP Table HOU2, on the other hand, is flawed for the reasons given above.
- 3.25 SESplan Policy 5 is clear that land is required to be allocated in LDPs to meet the requirements for each of the consecutive time periods such that all of these houses can be built. This itself implies that more than enough land (i.e. a generous amount) needs to be allocated.
- 3.26 Table A identifies a shortfall of 1,308 homes to meet the Sesplan Policy 5 housing requirement + 10% from 2009 – 2019. Table B shows a shortfall of 1,933 homes in the same period if generosity of 20% is required. Even if there is no generosity applied, the shortfall is 683 homes.

## 4. Conclusion

- 4.1 Our revised Tables are, in our view, based on the correct methodology, deriving from the content of SESplan and Scottish Planning Policy. In respect to 'generosity' we have produced two variant tables, one assuming 10% and the other 20%. As indicated above, we recommend that East Lothian Council undertakes additional work to assess what the appropriate level of generosity should be, between these two limits.
- 4.2 We recommend that LDP Table HOU2 is replaced by a new table, reflecting the correct methodology outline in this representation.

Revised Table HOU2 A (assuming 10% Generosity)

1. PLANNING PERIODS	2009 - 19	2019 - 24	TOTAL TO 2024	2024 - 28	TOTAL
2. SDP/SPP Housing Requirement to 2028	6,250	3,800	10,050	2,232	12,282
3. SDP/SPP Housing Requirement + 10%	6,875	4,180	11,055	2,455	13,510
4. Dwelling Completions 2009 – 15	2,038	0	2,038	0	2,038
5. Contribution from Established Land Supply	2,670	2,143	4,813	0	4,813
6. Contribution from New Allocations	790	3,725	4,515	1,485	6,000
7. Contribution from Future Windfall Sites	84	105	189	110	299
8. Loss of Supply to Dwelling Demolitions	-15	-8	23	-12	-35
9. Sub-Total Housing Land Supply	5,567	5,965	11,532	1,583	13,115
10. Contribution from Blindwells	0	291	291	388	679
11. Grand Total Housing Land Supply	5,567	6,256	11,823	1,971	13,794
12. Shortfall / Surplus of Housing Land <sup>(4)</sup>	1,308 deficit	2,076 surplus	768 surplus	484 deficit	284 surplus

Revised Table HOU2 B (Assuming 20% Generosity)

1. PLANNING PERIODS	2009 - 19	2019 - 24	TOTAL TO 2024	2024 - 28	TOTAL
2. SDP/SPP Housing Requirement to 2028	6,250	3,800	10,050	2,232	13,870
3. SDP/SPP Housing Requirement + 20%	7,500	4,560	12,060	2,678	14,738
4. Dwelling Completions 2009 – 15	2,038	0	2,038	0	2,038
5. Contribution from Established Land Supply	2,670	2,143	4,813	0	4,813
6. Contribution from New Allocations	790	3,725	4,515	1,485	6,000
7. Contribution from Future Windfall Sites	84	105	189	110	299
8. Loss of Supply to Dwelling Demolitions	-15	-8	23	-12	-35
<b>9. Sub-Total Housing Land Supply</b>	<b>5,567</b>	<b>5,965</b>	<b>11,532</b>	<b>1,583</b>	<b>13,115</b>
<i>10. Contribution from Blindwells</i>	<i>0</i>	<i>291</i>	<i>291</i>	<i>388</i>	<i>679</i>
<b>11. Grand Total Housing Land Supply</b>	<b>5,567</b>	<b>6,256</b>	<b>11,823</b>	<b>1,971</b>	<b>13,794</b>
<i>12. Shortfall / Surplus of Housing Land</i>	<b>1,933 deficit</b>	<b>1,696 surplus</b>	<b>237 deficit</b>	<b>707 deficit</b>	<b>944 deficit</b>



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CW Properties on behalf of

Mr A P Dale and Mr R F Dale

**Port Seton Links**

**Representation to the East Lothian Local Development Plan**

**Countryside Around Towns – Policy DC8**

23<sup>rd</sup> October 2016

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- 1.1 The Proposed LDP includes a new designation – Countryside Around Towns - which would give special status to specific areas of land in locations around towns and villages in East Lothian. It includes the Port Seton Links site (Appendix 1) to the east of Port Seton.
- 1.2 We disagree with both the principle of this policy and, more specifically, the inclusion of the Port Seton Links site within the Countryside Around Towns designation.
- 1.3 Paragraph 5.20 of the Proposed LDP states:

***“There are a number of areas beyond the Edinburgh Green Belt that are also subject to development pressure but should be retained as open or undeveloped. Countryside Around Town designations will apply and their objectives will be to conserve the landscape setting, character or identity of certain towns and villages.”***

- 1.4 The related Policy DC8 goes on to state:

***Development that would harm Countryside Around Towns objectives as defined in supplementary planning guidance once adopted will not be permitted. New development within areas designated as Countryside Around Towns will be supported in principle only where:***

***i) it is required to implement part of the green network strategy as defined by that strategy;***

***ii) it is required for community uses;***

***iii) it is required for rural business, tourism or leisure related use;***

***iv) it is essential infrastructure that has a clear operational requirement for that particular location and there is no other suitable site available; or***

***Any new development must not harm the landscape setting of the countryside location and must be of a scale, size and form that would not harm the objectives for the countryside around towns designation.***

- 1.5 In essence, therefore, this policy is intended to apply to areas of landscape importance. It is therefore not clear why the designation is required, as important landscapes and townscapes are already defined by the Area of Great Landscape Value and Conservation Area designations.
- 1.6 The text of the LDP Main Issues Report indicated that CAT designations are appropriate because it was not appropriate to extend the Green Belt any further into East Lothian, and this suggests that the purpose of CAT is simply to replicate Green Belt policy by another name. This, in our view, is wholly inappropriate, and contrary to the spirit of Scottish Planning Policy. Paragraph 49

of SPP says that for most settlements, a green belt is not necessary as other policies can provide an appropriate basis for directing development.

- 1.7 More specifically, we do not consider that the Port Seton Links site has any particular qualities that make it special. It is a visually well-contained site on the eastern edge of Port Seton, and adjacent to Seton Sands Holiday Park. We note that it forms part of a much larger area identified as CAT to the north, but it is not made clear why the subject land is considered appropriate for the CAT designation. We could speculate that there may be concern that development of the site might result in coalescence between Port Seton and Seton Sands. This may be the perception if one views the site on plan, where it presents a gap between the edge of the town and the caravan park. However, when viewed on site, the site is too narrow to present any significant visual gap. There is also a strong woodland buffer to the east of the site which will prevent any sense of coalescence.

# Submission 0244

**From:**  
**To:** [Local Development Plan](#)  
**Subject:** Salcoats (NK7) Fenton Gait East (9NK8) and Fenton Gait South (NK8) removal from proposed LDP sites for housing development  
**Date:** 04 November 2016 12:29:10

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My objection to the development of all of the above are many but the main ones are detailed below.

The local infrastructure can in no way cope with the increased traffic and extra number of residents. The roads around this proposed development not suitable to this increased traffic. Even if residents take the train into Edinburgh they will still need to drive to the station.

Gullane is a village with a small local school which contrary to what is being said by Cala will not be able to cope with the increased numbers of pupils who will also eventually going to filter through to North Berwick where there is already an increased role due to over-development of North Berwick.

The Doctors surgery will never cope with such a huge increase in patients who will not filter in slowly but will arrive en mass.

We live in a village and along with the other coastal villages they have a unique charm which encourages visitors to East Lothian. Golfers come to the coast to play and experience the uniqueness of East Lothian.

Are we to destroy this by almost making villages into small towns with very little distance between them.

This cumulative effect will run the very essence of why people choose to live and holiday in Gullane and the surrounding areas.

I could go on and on with reasons why these sites should NOT be developed when we have site in the village (The Fire school) which needs to be developed and will in itself increase the number of residents in the village substantially.

Regards

Trish

Trish Sims



# Musselburgh & Inveresk Community Council



Website: [www.muscc.co.uk](http://www.muscc.co.uk)

## EAST LOTHIAN LOCAL DEVELOPMENT PLAN

### RESPONSE FROM MUSSELBURGH AND INVERESK COMMUNITY COUNCIL

#### General Comments

Musselburgh and Inveresk Community Council (MICC) welcome the opportunity to comment on the Local Development Plan (LDP)

Although the LDP contains some proposals for dealing with the planned increased population of Musselburgh, MICC believe that the concentration of housing, some 5,300 new houses in the Musselburgh area will place undue pressure on the local infrastructure.

MICC welcome any proposals to improve railway infrastructure safeguarding land to allow platform extensions and new rolling stock put in place, we would very much appreciate them NOW as local commuters are facing huge problems at the moment. Time and time again we are approached by local residents with their concerns on Musselburgh's air pollution especially for children and the elderly. We would support the relocation of bus stops and any traffic management within reason that may improve the overall traffic situation and help to lower pollution as soon as possible.

We welcome the recent announcement that parking wardens will be returning to East Lothian as there have been concerns expressed about double parking and parking in areas which could be potentially dangerous. There is a suggestion of a 20mph speed restriction in residential areas and we would welcome that. Safer roads can only be a good thing for our community.

We would suggest that it is lack of foresight to imagine the current Musselburgh Primary Care centre would be able to cater for an extra 10,000 plus patients. As it stands at the moment patients have huge problems accessing appointments. Notwithstanding the problem we have recruiting new GP's. Musselburgh was promised a new nursing home several years ago and this was indeed earmarked at the old Tesco site. To date nothing has materialised and with the population living longer it is a great concern to us when people are housed outwith the area thus making it difficult for family to visit.

Whist we do not underestimate the difficulty of planning the future of educational provision in Musselburgh against the background of an expanding population and the

challenges that this will bring we feel that insufficient attention has been paid to this matter.

Musselburgh town centre is the heartbeat of our community and in recent days we have witnessed a few shop closures. Musselburgh suffers from the close proximity to Fort Kinnaird and many other retail outlets. When residents were surveyed they stated they would much rather shop locally than drive or bus to other locations, so, with this in mind it might be time to try and attract some high end establishments to our town. For our part we are trying to bring people into the town by holding a Christmas Market to let shoppers see what we have on offer and we encourage and welcome the Market that will be trialed in December with a view to it being an ongoing event.

Musselburgh is a town proud of its heritage and MICC believes that this must be respected. We must use everything within our means to safeguard the identity of our town and to maintain the town boundaries and any greenbelt that remains between Musselburgh and the surrounding area.

In a few years' time we will be consulted on the next LDP. If this current plan is allowed to proceed with 5000 plus houses we will then be required to hold back the sea!

Irene Tait  
On behalf of  
Musselburgh and Inveresk Community Council



# Musselburgh & Inveresk Community Council



Website: [www.muscc.co.uk](http://www.muscc.co.uk)

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Irene Tait  
On behalf of  
Musselburgh and Inveresk Community Council

Submitted to **East Lothian Proposed Local Development Plan**  
Submitted on **2016-11-04 11:41:18**

## About You

### 1 What is your name?

**First name:**

RACHEL

**Surname:**

GEE

### 2 What is your email address?

**Email address:**

rgee@clarendonpd.co.uk

### 3 Postal Address

**Address:**

Clarendon Planning & Development Ltd  
5a Castle Terrace  
Edinburgh

### 4 Please enter your postcode

**Postcode:**

EH1 2DP

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

Developer/ agent/ landowner

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

**Organisation:**

**Your role:**

Planning Consultant to Barratt David Wilson Homes

### 7 Are you supporting the plan?

Not Answered

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

No

## 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::**

Paragraph 1.30 - Support the Council's promotion for the reopening / new station at East Linton and their bid to the Scottish Government for funding. It is important that the LDP commits to actively progress East Linton station through partnership with the Scottish Borders Council and other relevant key agencies / stakeholders.

**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:**

Paragraphs 2.1 – 2.13 The Spatial Strategy should recognise the need for additional housing to be provided within the eastern areas of East Lothian, especially in East Linton, which provides a good range of local services and facilities and sustainable transport options.

Page 13 – Main Strategy Diagram - List of Main Proposals – The Dunbar Cluster – Preston Mains, East Linton should be included as a Housing site

Page 14 – Main Strategy Diagram – Dunbar Cluster – The housing numbers should be increased to recognise the contribution from the development of the Preston Mains site at East Linton.

Please refer to the written planning statement submitted by Clarendon Planning to the LPD in respect of Preston Mains, East Linton

**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):**

The Proposed Plan's Spatial Strategy appears to focus new housing and economic development around the main settlements within East Lothian.

It is acknowledged that the spatial strategy proposes the majority of new development in the west of East Lothian and that paragraph 2.129 of the LDP recognises that East Linton is one of the most accessible settlements in the Dunbar Cluster.

While this strategy is very much supported, the needs and demands for additional housing in the eastern areas of East Lothian should be fully recognised.

East Linton is located in the eastern part of the East Lothian Strategic Development Area, it has good accessibility to the surrounding road network and has the potential to encourage sustainable non-car travel through supporting the Council's case for the reopening of East Linton Station.

Paragraph 2.8 of the LDP encourages the expansion of existing settlements and it is submitted that the Preston Mains site is suitable and can deliver housing without adversely impacting the settlements environment or local infrastructure.

Please refer to the written planning statement submitted by Clarendon Planning to the LPD in respect of Preston Mains, East Linton

**Section 2f - Dunbar Cluster Strategy Map (pg 45)**

**1a Strategy Map for Dunbar Cluster - What modifications do you wish to see made to the strategy map for the Dunbar 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:**

page 45 - Dunbar Cluster Spatial Strategy Diagram - identify land at Preston Main, East Linton as a housing site (possible reference DMR12) .

Please refer to the written planning statement submitted by Clarendon Planning to the LPD in respect of Preston Mains, East Linton

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

**Justification for Modification(s) :**

The LDP recognises that East Linton is one of the main, and most accessible, settlements within the Dunbar Cluster. Generally, the LDP supports the expansion of existing settlements. The Preston Mains site at East Linton is an effective and deliverable site which can provide a development of approximately 100-150 houses in an accessible location and will not adversely impact the settlements character or landscape qualities.

The supporting planning, landscape, transport and heritage statements submitted with the representation for Preston Mains demonstrates the deliverability and suitability of the site for the development of approximately 100-150 new homes.



BDW Homes object to the non- inclusion of Preston Mains as a proposed site within the Dunbar Spatial Strategy and request that a specific development Proposal for Preston Mains is included in the LDP which states:-

"PROP DR12: Preston Mains, East Linton - Land is allocated for a residential development of circa 100 -150 homes. Any development proposals for the site must include a comprehensive masterplan for the entire allocated site that integrates development with the surroundings. Any development here is subject to the mitigation of any development related impacts, including on a proportionate basis for any cumulative impacts with other proposals including on the transport network and on education and community facilities as appropriate."

Please refer to the written planning statement submitted by Clarendon Planning to the LPD in respect of Preston Mains, East Linton

**Section 2f - Introduction to Dunbar Cluster (pg 46)**

**1a Introduction to Dunbar Cluster - What modifications do you wish to see made to the Introduction of the Dunbar 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:**

Paragraph 2.131 - The land at Preston Mains, East Linton should be allocated for the provision of 100-150 houses.

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

**Justification for Modification(s):**

It is considered that the land at Preston Mains is an effective and deliverable site. The justification for the site has been assessed against East Lothian Council's own site assessment criteria and the criteria for site effectiveness provided in PAN2/2010.

Given the identified constraints to development in terms of the East Linton's future expansion, the Preston Mains site is sited within the most appropriate direction for future growth and development.

The Preston Mains site is suitable for housing development in a marketable location, which is promoted for a new rail station. There are no known constraints which will impede the delivery of housing completions within the LDP period. The site is capable of a significant contribution to the potential land supply shortfall (see below comments).

Please refer to the Clarendon Planning and Development Ltd supporting written statement for Preston Mains.

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

**1a PROP DR1: Hallhill South West, Dunbar - What modifications do you wish to see made to Prop DR1 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 DR1 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.**

**Justification for Modification(s):**

**2a PROP DR2: Hallhill North, Dunbar - What modifications do you wish to see made to Prop DR2 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 DR2 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.**

**Justification for Modification(s):**

**3a PROP DR3: Hallhill Healthy Living Centre Expansion Land - What modifications do you wish to see made to Prop DR3 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 DR3 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.**

**Justification for Modification(s) :**

**4a PROP DR4: Brodie Road, Dunbar - What modifications do you wish to see made to Prop DR4 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 DR4 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.**

**Justification for Modification(s):**

**5a PROP DR5: Land at Newtonlees, Dunbar - What modifications do you wish to see made to Prop DR5 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 DR5 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.**

**Justification for Modification(s) :**

**6a PROP DR6: Beveridge Row Belhaven, Dunbar - What modifications do you wish to see made to Prop DR6 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 DR6 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.**

**Justification for Modification(s):**

**7a PROP DR7: Land at Spott Road, Dunbar - What modifications do you wish to see made to Prop DR7 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 DR7 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.**

**Justification for Modification(s):**

**8a PROP DR8: Pencraighill, East Linton - What modifications do you wish to see made to Prop DR8 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 DR8 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.**

**Justification for Modification(s):**

**9a PROP DR9: Land at East Linton Auction Mart - What modifications do you wish to see made to Prop DR9 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 DR9 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.**

**Justification for Modification(s) :**

**10a PROP DR10: Innerwick East, Innerwick - What modifications do you wish to see made to Prop DR10 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 DR10 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.**

**Justification for Modification(s):**

**11a PROP DR11: St John's Road, Spott - What modifications do you wish to see made to Prop DR11 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 DR11 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.**

**Justification for Modification(s):**

**12a Policy DR12: Development Briefs - What modifications do you wish to see made to Policy DR12 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 DR12 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.**

**Justification for Modification(s):**

### **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:**

Paragraph 3.31 - reference should be added to an additional 10%-20% generosity allowance as required by Scottish Planning Policy Paragraph 116.

Paragraphs 3.32 and 3.33 – should add that additional sites may be required to be brought forward to meet pre-2019 strategic housing targets and to maintain a five year effective housing land supply.

Paragraph 3.34 - reference should be made to delays in the Development Plan process as a contributing factor.

Paragraph 3.35 – amend second last sentence to state that additional sites will be brought forward if effective supply is not maintained.

Table HOU1 – Add new site to Dunbar Cluster: Preston Mains, East Linton, 150 unit capacity

Table HOU2 – caveat LDP site contribution as subject to agreement with development industry / Homes for Scotland.

Please refer to the written planning statement submitted by Clarendon Planning to the LPD in respect of Preston Mains, East Linton

**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):**

Paragraph 3.31 – To reflect Scottish Planning Policy

Paragraphs 3.32 and 3.33 - It is considered that proposed programming of LDP sites is overly optimistic and a shortfall will still remain when assessed against SDP requirements.

Paragraph 3.34 - Delays to Development Plan delivery, and the East Lothian LDP in particular, have exacerbated delivery issues at a time when the market cycle is in a strong position to deliver. It should be noted that East Lothian initiated the review of the adopted Local Plan in 2011 with a Call for Sites exercise. The Main Issues Report consultation did not occur until the beginning of 2015 and a Proposed LDP is only now at consultation in late 2016 (with examination and adoption likely to be mid/late 2017). This is despite SDP Supplementary Guidance (which confirmed strategic housing land requirements) being adopted in May 2014. Given Development Plan delays, additional short term housing sites should be allocated (and supported via application) to ensure pre-2019 targets are achieved.

Paragraph 3.35 – The Proposed LDP fails to meet the requirements of SDP Policy 6 in this respect, as detailed below.

Table HOU1/HOU2 - Contribution from Proposed LDP sites is not agreed.

- 2,115 completions are programmed from LDP sites in the period to 2019 which is split as 790 in 2017/18 and 1,325 in 2018/19 (HTN Table 14) - this would result in overall annual completions of 1,652 and 2,012 in these respective years (HTN Table 15) in comparison to the highest recorded figure of 867 (2006/07) and 2009-15 average of 340.

- 2,906 completions are programmed between 2019-24 which is split 990-530-445-435-506 from 2019-24 (HTN Table 14) - this results in overall annual completions being in excess of the highest ever recorded for three years (2019-22) as per HTN Table 15

- HTN Appendix 2 sets out estimated programming of Proposed LDP sites which supports the aforementioned figures for the two respective time periods. It is appreciated that this has been reviewed since the Main Issues Report stage. However, it is noted that an estimated 790 completions are programmed on 35 No. LDP sites in 2017/18 with a further 1,325 completions programmed for 2018/19. This will require planning approvals with agreed legal agreements and associated infrastructure (school) provision to allow for site starts by October 2017 at the latest. This is still highly optimistic given the LDP examination requirements in 2017 along with associated impact on infrastructure programming.

- Programming of LDP sites is not yet agreed with the development industry and the 2015 Housing Land Audit presents the most up to date assessment of supply.

- To counter the real risk that further slippage will occur in implementing the proposed allocations, further sites should be allocated/approved to increase the chances of strategic targets being achieved.

Please refer to the written planning statement submitted by Clarendon Planning to the LPD in respect of Preston Mains, East Linton

**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:**

**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):**

**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:**

Paragraph 3.41 – amend first sentence to state that proposed supply phasing is subject to agreement with development industry and if not agreed, additional sites may be required to be brought forward.

Advice Box 1 – amend Part 2 to take into account the SPP requirement for a 10%-20% generosity allowance on top of the housing land requirement. Amend Part 4 top remove reference to housing monitoring paper.

Paragraph 3.46 - Marketability, and associated phasing, is a key consideration and Paragraph 3.46 should be amended to reflect this.

Paragraph 3.48 – reference to discounting the marketability criteria of PAN2/2010 when assessing effective land supply shortfall should be deleted.

Policy HOU2 – Criteria should be amended to be: SESplan Policy 7 criteria plus ‘effectiveness’ and ‘contribution to sustainable development aims’.

Please refer to the written planning statement submitted by Clarendon Planning to the LPD in respect of Preston Mains, East Linton

**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):**

Paragraph 3.41 – the proposed phasing / contribution of LDP sites is not agreed.

Advice Box 1 - The proposed calculation does not take into account the SPP requirement for a 10%-20% generosity allowance on top of the housing land requirement. This should be reflected in effective land supply calculations. Additionally, Part 4 of Advice Box 1 is contested whereby a housing monitoring paper can be utilised to calculate effective supply. This should be derived only from a housing land audit agreed with the development industry.

Paragraph 3.46 - states that the ‘marketability’ criteria for assessing effective land supply, as set out in PAN2/2010 is unreliable and does not take into account the amount of potential land available for development. Whilst this marketability criteria can be influenced by market demand, it is crucial for this factor to remain a consideration in terms of realistic programming of sites. The Council would suggest that it is feasible to build an unrestricted number of houses on any one site but this fails to factor in developer capacity on any one site, i.e. realistic completions per annum from a single developer and maximum number of separate developers capable of operating at any one time on a single site. Marketability, and associated phasing, is a key consideration and Paragraph 3.46 should be amended to reflect this.

Paragraph 3.48 - suggests that the Council will discount the marketability criteria of PAN2/2010 when assessing effective land supply shortfall. This is contrary to national policy and should be deleted.

Policy HOU2 - It is noted that the recent Edinburgh LDP examination report recommends that their similar policy should reflect SESplan Policy 7 with just the addition of effectiveness and contribution to sustainable development. This approach should be reflected in East Lothian and proposed Policy HOU2 should be amended accordingly.

Please refer to the written planning statement submitted by Clarendon Planning to the LPD in respect of Preston Mains, East Linton

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

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

**Modifications(s) Sought:**

Paragraphs 3.101 - 3.105 - In terms of the Dunbar Cluster the provisions of the Proposed LDP for educational provision are supported in principle, however, if additional educational facilities are required as a result of additional housing in East Linton, it should be confirmed within the LDP as this would provide certainty for the Council, developers and local community.

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

**Justification for Modification(s):**

To accord with Circular 3/2012

Please refer to the written planning statement submitted by Clarendon Planning to the LPD in respect of Preston Mains, East Linton

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

**Modifications(s) Sought:**

The provisions of the LDP are generally supported in relation to the provision of community facilities. If additional educational facilities are required as a result of additional housing in East Linton, it should be confirmed within the LDP as this would provide certainty for the Council, developers and local community.

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

**Justification for Modification(s) :**

To accord with Circular 3/2012

Please refer to the written planning statement submitted by Clarendon Planning to the LPD in respect of Preston Mains, East Linton

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

**Modifications(s) Sought:**

While it is acknowledged that there is no requirement for additional healthcare facilities within East Linton, the general principle of charging developers for the provision of healthcare facilities is not supported.

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

**Justification for Modification(s):**

The provision of healthcare facilities is not the remit of Council's or developers .

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

**Modifications(s) Sought:**

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

**Justification for Modification(s):**

**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:**

Para 4.22 and Proposal T12 Railway Station Safeguarding at East Linton should positively commit to actively progress the reopening of the station through partnership with the Scottish Borders Council and other key agencies. The LDP should be clear on the funding required for this proposal and the funding sources e.g. Scottish Government.

**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) :**

The reopening of East Linton Station is fully supported, as it the Council's commitment to securing funding. However, the exact funding requirements and sources for this infrastructure provision should be transparent as possible in order to support the identified costs.

Please refer to the written planning statement submitted by Clarendon Planning to the LPD in respect of Preston Mains, East Linton

**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):**

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

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

**Modifications(s) Sought:**

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

**Justification for Modification(s):**

### 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:**

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) :**

**Visual Upload:**

No file was uploaded

**Visual Upload:**

No file was uploaded



# Representation to East Lothian Proposed Local Development Plan

In Support of  
Preston Mains, East Linton (Site Ref MIR/DR/HSGI32)

Prepared by  
Clarendon Planning and Development Ltd

On behalf of  
Barratt David Wilson Homes

November 2016



3	<b>Introduction &amp; Proposal</b>
4	<b>Section 1: Aims, Objectives &amp; Outcomes</b>
5	<b>Section 2: Spatial Strategy</b>
6	<b>Section 3: Growing our Economy &amp; Communities - Planning for Housing</b>
8	<b>Section 3: Growing our Economy &amp; Communities - Education &amp; Community</b>
8	<b>Section 4: Our Infrastructure &amp; Resources - Transport</b>
9	<b>Section 5 - Dunbar Cluster, East Linton</b>
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10	<b>Site Assessment - Preston Mains, East Linton</b>
12	<b>Conclusions - A Deliverable Site:</b>



## Introduction

This **representation to the Proposed East Lothian Local Development Plan 2016 (LDP)** has been prepared by Clarendon Planning & Development Ltd on behalf of Barratt David Wilson Homes (BDW).

The representation seeks to **promote the allocation of land at Preston Mains, East Linton for residential development.**

This representation outlines the merits of the inclusion of the Preston Mains site as a housing allocation within the Adopted East Lothian Local Development Plan.

## Proposal Background

The site extends to approximately 9 Hectares in total (the landowner has control of a wider land holding to the north and east) and sits on the eastern edge of East Linton.

The site is bound by the B147 (East Linton to Tynningame Road) to the south and established housing to the west (The Dean).

The intention would be to create new northern and eastern woodland boundaries to frame the development area which would also screen housing from Preston Mains farm buildings and surrounding environment.

Figure 1 highlights the indicative site area and, as detailed hereafter, the site forms one of the very few potential expansion areas for East Linton due to a number of development constraints, which are detailed in the sections below.

East Linton is located within the East Lothian

Strategic Development Area, as defined by the approved Strategic Development Plan (SDA). East Linton is identified within the SDA and was a specific area of search for housing provision within the MIR. The site is therefore within an approved focus area for future growth and would form an appropriate extension of East Linton, particularly given the emerging rail station plans.

Assuming a sympathetic and good design proposal which takes account of the surrounding historic environment and landscape, it is estimated that there is scope for approximately 100 -150 units, including a range of housing and on-site affordable housing provision.

The Preston Mains site was promoted through the East Lothian Local Development Plan Main Issues Report (MIR) for residential development comprising approximately 250 units (site reference MIR/DR/HSG132). A copy of the MIR representation is provided in Appendix 1. That representation provided an Indicative Development Framework. The Framework is still relevant as it highlights the key considerations for the future detailed design of the site.

Following submission of the MIR representation, BDW Homes have informally met with representatives of the East Lothian local community and detailed the proposed development. Following such discussions, together with gaining specialist landscaping, archaeology and traffic reports (which are detailed below), the proposal has been amended to provide approximately 100 - 150 units.

This representation to the Proposed LDP addresses the issues raised by East Lothian Council in their post MIR assessment of the Preston Mains site and reiterates the strong planning reasons for inclusion of the Preston Main as a deliverable

housing site, which would contribute to East Lothian Council's effective housing land supply. It provides comment on the Spatial Strategy provided within the Proposed LDP, together with the relevant policies and housing land requirements and supply. Finally, the representation provides

a detailed site assessment that confirms the **Preston Mains site is suitable, deliverable and effective and should be allocated as an housing site that can contribute to East Lothian's effective housing land supply.**

Figure 1 - Location Plan, Preston Mains, East Linton



### Aims & Strategy Drivers

1. To recognise that East Lothian is part of the wider city region and has a significant role to play in accommodating and providing for the city regions, as well as its own, economic, population and household growth, while safeguarding where appropriate assets that are irreplaceable and facilitating change in a sustainable way;

2. To identify locations where development of different types associated with these aims can take place, where relevant within the appropriate timescales, as well as where certain types of development should not occur;

3. To provide an appropriate framework of policies and proposals that promote and manage development in the area towards these aims whilst securing the right development in the right place and that do not allow development at any cost.

Barratt David Wilson Homes broadly supported the key aims in terms of East Lothian's role within the Edinburgh City Region. East Lothian requires to accommodate its share of the growth requirements as set out in SESplan for South-East Scotland with a primary focus on the East Lothian Strategic Development Area centred upon the main A1/ East Coast Rail transport corridor. It is clear that 'appropriate timescales' in terms of delivering spatial strategy as noted within Aim No.2 are not going to be addressed in terms of pre-2019 strategic housing requirements.

### Objectives & Outcomes

#### • Promote sustainable development

This objective is supported.

The acknowledgement that greenfield and prime agricultural land will be required for development in order to meet the housing land requirements is also fully supported.

In terms of Preston Mains, it should be recognised that given the relatively short distance from the site to East Linton village centre, together with the improved pedestrian and cycle links proposed by the supporting Transport Statement (see Appendix 2 of this representation), it is accessible to all local services and facilities without being reliant upon car travel. Equally, the opening of East Linton station will further minimise the need to travel by car to the county / regional centres. It is therefore submitted that the proposed housing at Preston Mains would promote the Council's sustainable development objectives through the reduction in car travel and making efficient use of infrastructure (transport and land use integration).

#### • Help grow the economy, increase housing supply and reduce inequalities

This objective is supported.

The proposed housing site at Preston Mains will address this objective by virtue of the provision of additional housing choice (both market and affordable) within a marketable location, along with associated job creation and local economic benefits.

The proposal will also support the services and facilities currently provided within East Linton village centre.

#### • Protect and enhance the area's high quality environment and its special identity

This objective is supported.

The proposed site at Preston Mains is not located within a Special Landscape Area; a Conservation Area or within the Countryside Around Towns policy area.

The attached Heritage Impact Assessment and Landscape Statement (Appendices 3 and 4 of this report) clearly confirm that through appropriate mitigation measures the proposed housing will not result in significant impact on surrounding Listed Buildings; Schedule Monuments; East Linton Conservation Area or the areas landscape character.

#### • Ensure adequate infrastructure capacity and an appropriate use of resources

This objective is supported.

Education infrastructure is now one of the main hurdles to delivering new housing in line with Government objectives. The proposed site can provide proportional financial contributions towards new and extended primary and secondary schools in the local area that may be required as a consequence of new development.

Furthermore, the proposed housing will strengthen East Lothian Council's case for the reopening of East Linton station.



## Proposed LDP Section 2: Spatial Strategy

The Proposed Plan's spatial strategy proposes the majority of new development in the west of East Lothian, as this location is considered to be the most accessible location for housing and business development opportunities.

While this strategy is supported, the needs and demands for additional housing and economic development in the eastern areas of East Lothian should be fully recognised.

East Linton is located in the eastern part of the East Lothian Strategic Development Area, it has good accessibility to the surrounding road network and has the potential to encourage sustainable non-car travel through the reopening of East Linton Station. **On this basis, the spatial strategy should recognise the need for additional housing to be provided within the eastern areas of East Lothian, especially in East Linton, which provides a good range of local services and facilities and sustainable transport options.**

In terms the spatial strategy, East Linton falls within the **Dunbar Cluster**. The Plan notes that, Dunbar / Belhaven, West Barns, East Linton are the most accessible settlements within the cluster and that these settlements, together with Innerwick, are within the eastern part of the East Lothian Strategic Development Area. Notably, the remaining settlements are not within the East Lothian SDA.

The LDP proposes substantial growth for this area with 8 land allocations for housing, which are predominantly in Dunbar. It is noted that the land at Pencaig Hill, East Linton is allocated for approximately 100 new houses. This site is located within the rural area and would incur the development of prime agricultural land.

Furthermore, in the Council's own assessment for this site, concern was raised in relation to the

accessibility of the site and whether a safe access could be provided from Haddington Road. The Council's assessment concluded that access could not be provided from the A199 unless a major new junction was provided e.g., a roundabout at the A199/B1407. Despite the Council's reservations on accessibility the site was still allocated for housing development.

In this respect, the proposed site at Preston Mains, while it too would incur the development of prime agricultural land, the supporting Transport Statement has confirmed that it can be accommodated safely on the surrounding road network and accessed from the B1407. The Transport Statement further confirms that the site can be integrated with the existing cycle and pedestrian footpaths and is within easy access to the services and facilities located in the village centre.

The supporting Landscape Statement also confirms that development of the scale proposed at Preston Mains would not have a negative impact on the surrounding landscape character.

Equally, the Heritage Impact Assessment undertaken for Preston Mains advises that with appropriate mitigation measures the proposed housing development would not significantly impact the surrounding Listed Buildings, Scheduled Monuments or Conservation Area. **It is therefore submitted that the Preston Mains site can provide a development of approximately 100 - 150 houses without significant impacts.**

As detailed below, East Lothian have not identified sufficient short term housing sites. Given that there is commitment for the reopening of East Linton station, the village as a whole will become more accessible to the wider surrounding area and will not be reliant upon car travel. The assessment of Preston Mains below clearly demonstrates the deliverability and suitability of the site for

approximately 100-150 new homes. **As such, BDW Homes object to the non- inclusion of Preston Mains as a proposed site within the Dunbar Spatial Strategy.**

BDW Homes submit that the Spatial Strategy for the Dunbar Cluster should be amended to include the Preston Mains site for future housing, as per Figure 2 below and associated Proposal: **Land at Preston Mains, East Linton. Capacity 100 - 150 homes with associated landscaping and infrastructure.**

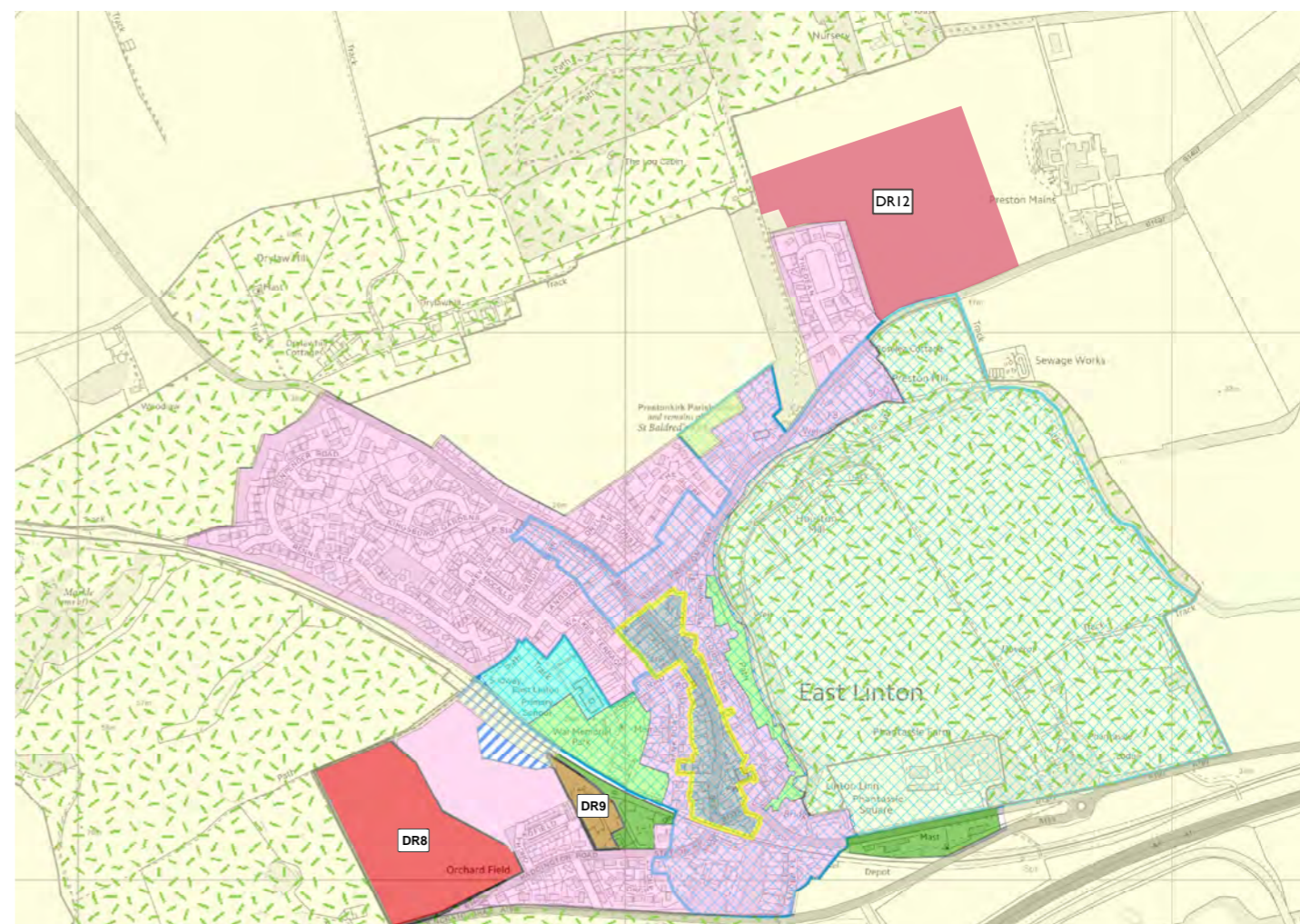


Figure 2 - Spatial Strategy for East Linton



### Housing Land Requirement

Paragraph 3.31 notes the SDP Supplementary Guidance housing land requirements of 6,250 homes in 2009-19 and 3,800 homes in 2019-24. However, **reference should be added to an additional 10%-20% generosity allowance as required by Scottish Planning Policy (SPP Paragraph 116).**

Paragraphs 3.32 and 3.33 note that the LDP has identified new housing allocations to ensure that SDP requirements are met and states that, indeed, an excess has been provided. **However, as noted below, it is considered that proposed programming of LDP sites is overly optimistic and a shortfall will still remain when assessed against SDP requirements.**

Paragraph 3.34 states that the rate of housing depends not just upon SDP or LDP requirements but the ability of the market to deliver. Whilst this is true, the fact remains that delays to Development Plan delivery, and the East Lothian LDP in particular, have exacerbated delivery issues at a time when the market cycle is in a strong position to deliver. It should be noted that East Lothian initiated the review of the adopted Local Plan in 2011 with a Call for Sites exercise. The Main Issues Report consultation did not occur until the beginning of 2015 and a Proposed LDP is only now at consultation in late 2016 (with examination and adoption likely to be mid/late 2017). This is despite SDP Supplementary Guidance (which confirmed strategic housing land requirements) being adopted in May 2014.

**Given Development Plan delays, additional short term housing sites should be allocated (and supported via application) to ensure pre-2019 targets are achieved.**

### Housing Land Supply

As presently drafted, it is **incorrect to state that the allocated sites will ensure a five-year effective housing land supply can be maintained. The Proposed LDP fails to meet the requirements of SDP Policy 6 in this respect, as detailed below.**

Table HOU1 sets out Proposed LDP housing proposals with new sites providing for 7,772 units and established land supply providing for 5,811 units. Allowances for completions 2009-15 (2,038), windfall sites (299), small sites (115) and demolitions (-35) amount to a total supply of 16,000 units in the period 2009-32.

The capability of the established land supply and LDP sites to contribute to the LDP requirement in the periods 2009-19 and 2019-24 is then set out in Table HOU2.

Contribution from established land supply generally accords with the agreed 2015 Housing Land Audit and the further explanation within the LDP's Housing Technical Note (HTN).

Contribution from Proposed LDP sites is however questioned, as per the following:

- 2,115 completions are programmed from LDP sites in the period to 2019 which is split as 790 in 2017/18 and 1,325 in 2018/19 (HTN Table 14) - this would result in **overall annual completions of 1,652 and 2,012 in these respective years (HTN Table 15) in comparison to the highest recorded figure of 867 (2006/07) and 2009-15 average of 340.**
- 2,906 completions are programmed between 2019-24 which is split 990-530-445-435-506 from 2019-24 (HTN Table 14) - this results in

overall annual completions being **in excess of the highest ever recorded for three years (2019-22)** as per HTN Table 15

- HTN Appendix 2 sets out estimated programming of Proposed LDP sites which supports the aforementioned figures for the two respective time periods. It is appreciated that this has been reviewed since the Main Issues Report stage. However, it is noted that **an estimated 790 completions are programmed on 35 No. LDP sites in 2017/18 with a further 1,325 completions programmed for 2018/19. This will require planning approvals with agreed legal agreements and associated infrastructure (school) provision to allow for site starts by October 2017 at the latest.** This is still highly optimistic given the LDP examination requirements in 2017 along with associated impact on infrastructure programming.

As presented, Table HOU2 demonstrates a 23% generosity allowance across the combined 2009-24 period. However, for the first period to 2019 the excess is 10% (642 units) and given the concerns noted above over the 2,115 programmed completions from LDP sites pre-2019, this could clearly be cancelled out. It remains the fact that **programming of LDP sites is not yet agreed with the development industry** and the 2015 Housing Land Audit presents the most up to date assessment of supply.

**To counter the real risk that further slippage will occur in implementing the proposed allocations, further short term deliverable sites should be allocated/approved to increase the chances of strategic targets being achieved.**

### Effective Land Supply Methodology

Paragraph 3.41 re-states that the LDP identifies a generous land supply and suggests that it is the inability of housebuilders to build at a suitable rate that leads to potential failure to meet the five year effective land supply requirements. This again down plays the direct impact of considerable delays to plan preparation by the Council and the clear interconnection between land availability and market cycles.

Paragraph 3.44 and 'Advice Box 1' sets out the Council's position on assessing whether a five year effective housing land supply is being maintained. Based on this approach, the current position should be assessed in line with Part 2 of this advice, i.e.

*Part 2. If less than five years of the first plan period remain, a pro-rata figure of the annualised Housing Land Requirement for the second plan period shall be added to any shortfall figure from the first (calculated by subtracting completions achieved since the base date of the SDP from the Housing Land Requirement in the first plan period) - Proposed LDP Advice Box 1*

**The proposed calculation does not take into account the SPP requirement for a 10%-20% generosity allowance on top of the housing land requirement. This should be reflected in effective land supply calculations.**

**Additionally, Part 4 of Advice Box 1 is contested whereby a housing monitoring paper can be utilised to calculate effective supply. This should be derived only from a housing land audit agreed with the development industry.**

**The adjusted calculation is illustrated in Table A on the next page.**

# Proposed LDP

## Section 3: Growing our Economy & Communities - Planning for Housing

**Table A**  
**5 year Effective Land Supply 2015-2020**

SESplan 1st Period 2009-19	6,250
Add 10% minimum generosity	625
Sub-total	6,875
Minus completions 2009-15	-2,038
Net 1st Period requirement <b>(A)</b>	4,837
SESplan 2nd Period 2019-24	3800
Add 10% minimum generosity	380
Sub-total	4,180
Pro-rata figure for 2019-20 <b>(B)</b>	836 (4180/5)
Total 5 Year Requirement	5,673 <b>(A+B)</b>
2015 HLA Programmed Supply	3,307
Surplus/shortfall	-2,366
Effective Land Supply	2.9

Additional sites granted by appeal and not within the 2015 HLA provide for 687 units (North Berwick 140 units and 125 units, Dunbar 90 units, Old Craighall 52 units, Pencaitland 120 units, Dolphingstone 160 units). On the generous assumption that all of these units could be programmed within a five year period, this would result in an amended **shortfall of 1,679 units**.

Even if the 10% generosity allowance was removed a substantial shortfall would still exist, i.e.

- Period 1 requirement (6,250) - completions (2,038) = 4,212
- Period 2 requirement (760, being 1 year of 2019-24 requirement)

- Total 5 year effective land requirement = 4,972
- 2015 HLA Programmed Supply = 3,307
- Surplus/shortfall = - 1,665 (3.3 year supply)

Paragraph 3.46 states that the 'marketability' criteria for assessing effective land supply, as set out in PAN2/2010 is unreliable and does not take into account the amount of potential land available for development. Whilst this marketability criteria can be influenced by market demand, it is crucial for this factor to remain a consideration in terms of realistic programming of sites. The Council would suggest that it is feasible to build an unrestricted number of houses on any one site but this fails to factor in developer capacity on any one site, i.e. realistic completions per annum from a single developer and maximum number of separate developers capable of operating at any one time on a single site. **Marketability, and associated phasing, is a key consideration and Paragraph 3.46 should be amended to reflect this.**

Paragraph 3.47 states that allowing additional sites to come forward to meet a land supply shortfall would undermine the plan-led system and associated infrastructure planning. This is countered by the need for the Council to allocate a sufficient range and type of sites in the first place, which has not been the case in the past with too great an emphasis on large-scale development areas which have not delivered.

Paragraph 3.48 suggests that the Council will discount the marketability criteria of PAN2/2010 when assessing effective land supply shortfall. This is **contrary to national policy and should be deleted.**

Policy HOU2 sets out the criteria by which potential new sites to meet an effective land supply shortfall should be assessed. Whilst requiring compliance with SESplan Policy 7 criteria (i.e. impact on local character, Green Belt objectives and local infrastructure availability), the policy

has additional criteria; location (extension of defined settlement), effectiveness (can be substantially complete within 5 years), scale (maximum of 300 units), timing (housebuilder interest) and development plan strategy (not prejudicing existing allocations and associated infrastructure requirements).

**It is noted that the recent Edinburgh LDP examination report recommends that their similar policy should reflect SESplan Policy 7 with just the addition of effectiveness and contribution to sustainable development.**

**This approach should be reflected in East Lothian and proposed Policy HOU2 should be amended accordingly.**

For clarity, the proposed site at Preston Mains could meet the requirements of the proposed Policy HOU2:

1. **Location** - The site is an extension of an established settlement within the East Lothian Strategic Development Area.
2. **Effectiveness** - Site is under control of housebuilder and can be completed within a five year period.
3. **Scale** - The proposal would be appropriate in relation to the existing settlement and is under 300 units (proposal is for 100 - 150).
4. **Timing** - The site is under legal contract to Barratt David Wilson Homes and can be delivered in the short term.
5. **Development Plan Strategy** - Infrastructure in terms of transport/access is achievable and in terms of education, financial contributions would assist with delivering primary and secondary school capacity in the catchment area.

**6. Infrastructure** - As above, the site can be implemented with planned education infrastructure committed.

### Affordable Housing

Proposed Policies HOU3 and HOU4 are generally supported in terms of setting a 25% quota for sites of over five dwellings and providing for a wider range of housing tenure to constitute 'affordable' to maximise potential for delivery.

## Proposed LDP

### Section 3: Growing our Economy & Communities - Education & Community

#### Education Infrastructure Strategy

It is noted that, with reference to education provision in the Dunbar Cluster, the LDP states that additional capacity will be required at Dunbar Grammar to accommodate the additional housing. The Proposed LDP further notes that at primary school levels, further housing is likely to require the provision of additional capacity at specific schools.

Proposal ED6 advises that the Council will add a phased permanent extension to Dunbar Grammar and the required primary schools to meet the needs arising from the proposed new housing development in the Dunbar Cluster and that developer contributions will be sought to fund this provision.

**The overall approach to education for the Dunbar Cluster as outlined in Proposal ED6 is supported in principle.**

#### Education Contribution Requirements

The cumulative impact approach to education provision is detailed within the Supplementary Guidance to meet the Proposed LDP strategy, based on specified scales of residential development within the associated contribution zones - contained within Appendix 1 of the Proposed LDP.

The proposed site at Preston Mains, East Linton, is located within the Dunbar Grammar Education Zone and the East Linton Primary Education Zone. Page 28 of the Supplementary Guidance: Developer Contributions Framework outlines the specific sums for this zone. The proposed site would require to make the following financial contributions.

**£4,282 per house towards Secondary capacity**  
**£8,610 per house towards Primary capacity**  
**Total of £12,892 per house**

Whilst a cumulative approach (infrastructure fund) is supported in principle as it can increase certainty for all parties, the exact funding requirements should be as transparent as possible.

In this regard, costings for new infrastructure, in terms of a **clear calculation of how this cost is spread across proposed contribution sites/areas, should be set out in more detail.**

#### Community Facilities (Proposal CFI)

New Community facilities requirements for the Dunbar Cluster are set out in Proposal CFI. No specific requirements of need are identified for East Linton. Of particular note is that the Developer Supplementary Contributions Supplementary Guidance advises that contributions from housing proposals in East Linton may be required towards other facilities or infrastructure, such as open space. While this comment is acknowledged, the exact additional facilities and funding required as a result of additional housing in East Linton should be transparent.

#### Health and Social Care Facilities (Proposal HSC2)

New health care proposals are noted within Proposal HSC2. No specific requirements are noted for the East Linton area.

#### Open Space and Play Provision (Policy OS3&OS4)

Minimum open space requirements for new housing and off-site enhancements are noted within Policy OS3 and associated Advice Box 2. Similarly, play provision requirements (on site and off site) are noted within Policy OS4.

The proposed site can adhere to these requirements which would be the subject of detailed design considerations

## Proposed LDP

### Section 4 - Infrastructure - Transport

#### Transportation – Location of New Development

Policy T1 requires new development to be well located and accessible in relation to public transport and walking/cycling routes, which the proposed site at Preston Mains wholly adheres to as confirmed by the Transport Statement provided in Appendix 2.

#### Transport Infrastructure Delivery Fund

Policy T32 outlines the Council's proposed approach to cumulative impact and the proposed transport infrastructure delivery fund linked to the Proposed LDP strategy. This is reflected in Transportation Contribution Zones set out within LDP Appendix 1.

Whilst not covered by site specific requirements, the proposed site lies within the following contribution zones (Supplementary Guidance: Developer Contributions Framework sets out contributions):-

Segregated Active Travel Contribution Zone: £454 per unit  
Rail Network Contribution Zone: £218.28 per unit  
Old Craighall A1/A720 Junction Contribution Zone: £15.48 per unit  
Salter's Road Interchange A1 Contribution Zone: £42.76 per unit  
Bankton Interchange A1 Contribution Zone: £28.96 per unit  
Musselburgh Contribution Zone: £11.13 per unit  
Tranent Contribution Zone: £23 per unit  
**Total £793.61 per unit**

As with education, a clear and transparent calculation is required to support these unit costs.

Proposal T2 specifically relates to East Linton Station and safeguards land required to accommodate the new rail halt, car park and access. It advises that the Council will maintain its efforts to source appropriate funding and provision of a service.

The reopening of East Linton rail station is fully supported,



## Proposed LDP Section 5: Dunbar Cluster, East Linton

In terms of the most appropriate direction of growth for East Linton Figure 2 above clearly highlights the constraints of the village. This Figure confirms that East Linton is constrained to the north and west by the Countryside Around Towns policy and archaeological sites. Development to the south of the village is restricted to the SEPA flood zone, the East Linton Conservation Area and associated archaeology sites.

**The growth options in East Linton are limited. Thus, the proposed site is considered to be the most logical option for future development.**

## Proposed LDP Section 6 - Indicative Development Framework

As stated above in Section 1, the MIR representation for the Preston Mains site provided an Indicative Development Framework for future development of the land. This Framework is still very relevant in terms of the future development of the site and is promoted as part of this representation as being an appropriate illustration for the future development of the subject site.

Figure 3 outlines the indicative development framework. It is considered there is scope to utilise natural features (including the landscape ridge) whilst also providing extensive additional landscaping for form a long term settlement edge.

In accordance with the Landscape Statement (Appendix 4) and the Heritage Impact Assessment (Appendix 3) the retention of the hedgerow fronting the main road would form part of the landscape proposals with the exception of access requirement.

Open space (south-facing) within the site would link with a woodland path through the new structural planting and link with paths to the west.

Built form would allow for a range of terraced, semi detached and detached building types set within informal blocks with a shared surface street network.

Vehicular access can be achieved directly from the sites frontage onto the road to the south. In addition, some localised road upgrading, as outlined by the submitted Transport Statement (Appendix 2) and extension of the 30mph limit.



Figure 3 - Indicative Development Framework for Preston Mains, East Linton



## Proposed LDP Environmental Report Appendix 9 Site Assessment – Preston Mains, East Linton

The Council has provided a Site Assessment for each of the sites promoted for development within the Proposed LDP Environmental Report. The site at Preston Mains (Ref MIR/DR/HSG132) was assessed by East Lothian Council in their review of sites following consultation on the Main Issues Report (MIR). The results can be found within the Environmental Report for Dunbar, Appendix 9 of the Proposed LDP's Technical Papers.

The Council considered each site in terms of 'Suitability and Deliverability of the Site' and then against a set of environmental criteria that assessed the 'Potential Impacts of the Development'. The significance of each criteria was scored through the use a traffic light coding system e.g. good (green), reasonable (amber) or poor (red).

Appendix 5 provides an analysis of the Council's assessment for the Preston Mains site against their preferred housing site at Penraig Hill, known as "East Linton West Expansion". From a review of the two site assessments it is considered that the sites are of equal standing and there is no justification for Preston Mains not to be supported for housing development.

The Council's assessment of the Preston Mains site was based upon the site comprising 250 units while the current proposal is for approximately 100-150 units. Furthermore, the Council's judgement assessment fails to consider, or explore, potential mitigation measures that could be adopted in the future development of the site.

Since the promotion of the Preston Mains site in response to the MIR consultation, the assessment of the site has been further developed, in terms of landscape, traffic and archaeology and low level community consultation with local key stakeholders has also been undertaken

Accordingly, a revised site assessment of Preston Mains has been undertaken by Clarendon Planning and Development Ltd, which reviews the current development proposal of approximately 100-150 houses. The assessment is provided by this representation:-

SUITABILITY AND DELIVERABILITY OF SITE		
<b>Location</b>	The site adjoins the north eastern edge of East Linton's settlement boundary but is outwith the current settlement boundary. The site is located adjacent to the Deans, a relatively modern housing development. The site is situated within walking distance of East Linton village centre and through improved pedestrian and cycle access, it will become better integrated with the existing settlement.	Amber
<b>Accessibility</b>	The submitted Transport Statement (Appendix 1) confirms that the proposed development site could be supported by the existing road infrastructure with suitable mitigation measures. There are no significant transportation reasons to prevent the site being identified as housing site within the LDP.	Amber
<b>Exposure</b>	The site has some shelter from northerly winds due to woodland to the north and the lower elevation of the site. The site will be further sheltered through additional landscaping which is proposed as part of the indicative development framework.	Green
<b>Aspect</b>	The site is south facing.	Green
<b>Suitability for Proposed Use</b>	East Lothian Council has confirmed that there is no conflict of use as housing with the surrounding land uses, which include agricultural and housing uses.	Green
<b>Fit with Strategic Policy Objectives and Direction</b>	East Lothian Council has confirmed that the site is within the East Lothian SDA as identified within SESplan and is adjacent to the main settlement, which provides a wide range of services and facilities. Furthermore, the Council have confirmed that the proposed development would "align" well with strategic policy of "steering new development towards the most sustainable locations within the city region"	Green
<b>Physical Infrastructure</b>	East Lothian Council has confirmed that the site would be served by the Castle Moffat Water Treatment Works and the East Linton Waste Water Treatment Works.	Amber
<b>Service Infrastructure Capacity</b>	East Lothian Council has confirmed that the site is within the catchment of East Linton Primary School and Dunbar Grammar High School, both have limited capacity. Desk based investigations has illustrated that the capacity of East Linton Primary school can be extended through the provision of additional in order to accommodate additional pupils generated from the proposed housing.	Amber
<b>Deliverability / Effectiveness</b>	There are no constraints to the development of this site becoming part of the effective housing land supply for the 2016 East Lothian LDP. The landowner is a willing seller and the developer has committed to the provision of approximately 100-150 units on this site within the LDP period.	Green



POTENTIAL IMPACTS OF DEVELOPMENT		
<b>Biodiversity, Flora and Fauna</b>	East Lothian Council has confirmed that the site (1) is not within any designated international, national or local nature conservation areas; (2) would not result in loss of protected trees or woodland; (3) the site is approximately 2.5km from the Firth of Forth SPA, Ramsar and SSSI.	Green
<b>Population</b>	The site would provide housing and accord to the Council's requirement for provision of affordable housing. Through the improved pedestrian, cycle and vehicle links, as proposed by the Transport Assessment and Indicative Development Framework, the site will have good access to local facilities and services.	Green
<b>Human Health</b>	East Lothian Council has confirmed the site is not contaminated. Through the proposed improved cycle and pedestrian links, the site will have good connection to the villages exiting open spaces, together with the area surrounding the site.	Green
<b>Soil</b>	The development of this site would incur the loss of some class 2 prime agricultural land.	Red
<b>Water</b>	The site is not at risk of flooding, as confirmed by SEPA's flood risk maps.	Green
<b>Air</b>	East Lothian Council has confirmed that the "site is unconstrained by existing sources of pollution". Furthermore, through the proposed improvement to cycle and pedestrian networks, the site will have good active travel accessibility to local facilities and services and reduce the need to travel by car.	Yellow
<b>Climatic Factors</b>	The site is well related to local facilities and services for access by foot and bike. Inevitably there will be a need for travel by car to access service / facilities at a town / regional scale, by the proposed new station at East Linton could lessen the requirement for car use. The southern aspect of the site would lend itself to resource efficient development.	Yellow
<b>Material Assets</b>	The development of the site would lead to loss of prime agricultural land.	Red
<b>Cultural Heritage</b>	A Heritage Impact Assessment has been undertaken for the site by AOC Archaeology Ltd (Appendix 3). The report assesses the possible Cultural Heritage implications of the proposed housing and concludes that through appropriate mitigation measures the development will not result in significant impact on surrounding Listed Buildings, Scheduled Monuments or Conservation Area. The Heritage Impact Assessment can be found in Appendix 3) of this representation.	Yellow
<b>Landscape</b>	A specific Landscape Assessment has been undertaken for the site and proposed housing. The purpose of the assessment was to consider the suitability of the site for development in respect of landscape capacity and potential visual impact. The assessment is provided in Appendix 4 and concludes that the proposed development would create a balanced addition to East Linton with potential for creating footpath/cycleway links, which could be achieved with minimal impact on the landscape character and visual resource.	Yellow

Based upon a review of the site against the Council's own site assessment criteria, it is considered that the Preston Mains site scores very well in terms of appropriateness for development. The significant, or poor, impacts highlighted by the assessment relate specifically to the use of prime agricultural land. Notably, the Proposed LDP has accepted the development prime agricultural land in order to meet the development requirements of SESplan. On this basis, the above Table clearly shows that: -

1. **The site is suitable, available and deliverable for housing provision within the LDP period, and**
2. **The proposed housing development will not result in any significant impact on the surrounding area.**

Equally, from a review against the Council's assessment for Pencriag Hill, it can be seen that Preston Mains compares favourably, if not better than, the allocated site. **It is therefore concluded that with suitable mitigation measures, as outlined in the supporting specialist reports, there is no reason why the proposed site at Preston Mains cannot contribute positively as a new housing site.**

**It is therefore submitted that the Preston Mains site should be allocated as a suitable site for the provision of housing within the next 5 years. On this basis, the East Lothian LDP 2016 should allocate Preston Mains site within the effective housing land supply.**

# Conclusions - A Deliverable Site

## Site Effectiveness Summary

Scottish Planning Policy and guidance set out in PAN 2/2010 Affordable Housing and Housing Land Audits require that sites allocated within Local Development Plans are effective, being able to contribute completions during the plan period (up to year 10 from LDP adoption). As such, PAN2/2010 criteria for assessing site effectiveness provide a test against which sites require to be gauged **with land at Preston Mains considered effective, being free of potential site constraints and able to deliver units within the plan period.**

### Specifically: -

#### Ownership

The site is owned by a willing seller and under contract to a national housebuilder on board.

Status: **Effective**

#### Physical

There are no physical constraints to the development of the site.

Status: **Effective**

#### Contamination

The site is not known to be contaminated.

Status: **Effective**

#### Deficit Funding

The development would be privately funded, also allowing for required infrastructure upgrades.

Status: **Effective**

#### Marketability

East Linton is a highly marketable area in East Lothian. The proposed site could be programmed for completion within the LDP period (including a contribution to the pre-2019 SESplan period). Based on the estimated capacity of 150 units.

Status: **Effective**

#### Infrastructure

There are no known constraints to the development of this site.

Status: **Effective**

#### Land Use

Housing (both private and affordable) is the predominant proposed use for the site.

Status: **Effective**

#### Overall

**There are no known constraints which will impede delivery of housing completions within the LDP period.**

**The site is a suitable for housing development in a marketable location, which is promoted for a new rail station. It is capable of a significant contribution to the potential land supply shortfall. The site compares favourably with allocated housing sites within the Proposed LDP and is considered as a location site within the Dunbar cluster area.**

#### Planning Application & Supporting Studies

In order to demonstrate the deliverability of the Preston Mains site, BDW Homes submitted a Proposal of Application Notice to East Lothian Council on 28 October 2016. An initial pre-application consultation event is to be undertaken on 13th December 2016 at the East Linton Community Hall. The purpose of the event is to introduce the potential development proposals in broad terms to the local community further to initial discussions already held.

An application for Planning Permission in Principle is currently being prepared with a view to submission in early 2017. The application will be supported by documents that assess the site and proposed development in detail. On this basis, once submitted,

the planning application will be an important material consideration in the examination of the Preston Main site as a suitable and deliverable housing site and should be taken into account by East Lothian Council and in the future LDP Examination by Scottish Ministers.



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# Preston Mains, East Linton

## Supporting Transport Statement



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## **Introduction**

Capabilities on project:  
Transportation

# 1 Introduction

## 1.1 Overview

AECOM have been commissioned by Barratt & David Wilson Homes (BDWH) East Scotland Ltd. to prepare a Transport Statement (TS) and framework Travel Plan (TP) in support of a Local Development Plan representation for a potential residential development site located in Preston Mains, northeast of East Linton.

The site is located on the northeast of East Linton, bounded by Preston Road (B1407) to the south, The Dean housing to the west, Preston Main Farm buildings to the east and woodland to the north. The proposed site location is shown in **Figure 1** below.



**Figure 1: Site Location**

The development site has the capacity for up to 150 residential units. An outline masterplan developed by Clarendon Planning & Development on behalf of BDWH proposes the creation of new northern and eastern woodland boundaries to edge the development area which would also screen housing from Preston Main Farm buildings.

East Linton has been identified within the East Lothian Strategic Development Area, as defined by the South East Scotland Strategic Development Plan (SESplan) and in the proposed Local Development Plan published for consultation in early September 2016. However, the growth options in East Linton are largely limited due to some development constraints, such as flooding issues, archaeological remains, conservation area and the proposed 'Countryside Around Towns' policy. Thus, the proposed site is considered to be the most logical option for future development.

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## **1.2 Methodology**

This TS and framework TP have been prepared taking account of the Scottish Government's guidance on transport planning policy which is outlined in a number of documents including: Scottish Planning Policy (2014), Planning Advice Note (PAN) 75 - Planning for Transport, and Transport Assessment Guidance (2012). Consideration has also been given to local transport policies and guidance prepared by East Lothian Council including the East Lothian Local Development Plan.

The TS considers the accessibility of the site in terms of the Scottish Planning Policy's road user hierarchy, which prioritises travel by the most sustainable forms. Whilst walking, cycling, and public transport travel are considered to have greater significance in these terms than private car travel, this report also assesses the impact of vehicular trips on the local road network. All modes of transport have been considered and, where appropriate, mitigation measures have been identified with a view to delivering a development which can be accessed safely and easily by all future users.

## **1.3 Report Objectives**

The TS has been produced to review the transportation implications of the residential development at Preston Mains, East Linton. All modes of transport have been considered and, where appropriate, mitigation measures to minimise the negative impacts have been identified with a view to delivering a development which can be accessed safely and easily by all future users without significant detriment to the local and wider area.

## **1.4 Report Structure**

The remainder of this TA report is structured as follows:

- Chapter 3: Transport Planning Policy
- Chapter 4: Development Proposals
- Chapter 5: Existing Accessibility and Connectivity
- Chapter 6: Future Accessibility
- Chapter 7: Travel Plan Framework
- Chapter 8: Summary and Conclusions



## **National, Regional and Local Policy**

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## 2 National, Regional and Local Policy

### 2.1 Introduction

The following section identifies and discusses planning policies that are directly applicable to the transportation context of the site. The following paragraphs will firstly set out the national context within which any development proposals will be considered, before outlining regional and local transport planning policies.

### 2.2 National Policy

#### 2.2.1 Scottish Planning Policy (2014)

The most recent iteration of Scottish Planning Policy (SPP), approved by Scottish Ministers in June 2014, sets out the context and priorities of the Scottish Planning System. It has been produced in order to promote a level of consistency in the delivery of new developments throughout Scotland but maintaining the importance of the local context. It forms part of a suite of planning documents produced by the Scottish Government that includes National Planning Framework 3 (NPF3), Creating Places, Designing Streets and various other planning and design circulars. Although a non-statutory document, the Town and County Planning (Scotland) 1997 Act requires that the content of SPP is regarded as a material consideration that carries significant weight within the planning process.

The two fundamental principles of SPP are concerned with ensuring sustainability and the creation of high quality places. The policy states that the Scottish Government has a commitment to sustainable development reflected in its purpose of creating a more successful country with opportunities for Scotland to flourish through increasing sustainable economic growth.

Transport considerations are largely contained within the “connected place” objective of the Policy. It specifies that “*planning can play an important role in improving connectivity and promoting more sustainable patterns of transport and travel as part of the transition to a low carbon economy.*” Key transport objectives are concerned with:

- Optimising the use of existing infrastructure;
- Reducing the need to travel;
- Providing safe and convenient opportunities for walking and cycling for both active travel and recreation, and facilitate travel by public transport;
- Enabling the integration of transport modes; and
- Facilitating the movement of freight by rail or water.

This is primarily materialised within the implementation of a new road user hierarchy which prioritises more sustainable modes of travel, including walking and cycling, followed by public transport and finally private car trips. In order to achieve this, developments should provide walking and cycling opportunities for the purposes of active travel as well as for recreation. Further to this, new developments should facilitate travel by public transport, including, where appropriate, the provision of bus stop facilities within a 400m walking distance.

The development site currently has limited access to pedestrian routes and public transport. It is considered, however, that with appropriate mitigation measures, and plans for improved rail access discussed later in this report, that access to and travel by sustainable travel modes can be improved.

#### 2.2.2 Designing Streets (2010)

Designing Streets is the Scottish Government’s policy document which provides guidance on good practice for the design of new and existing streets. Although it can be implemented within a variety of different contexts, it is primarily intended to be applied within new residential developments.

In contrast with the standards based methodology contained within previous road standards guides, it encourages a design-led approach which prioritises streets that generate a sense of place as opposed to only serving as thoroughfares for movement. In accordance with Designing Places, it advocates that streets should satisfy six qualities and be:

- Distinctive;

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- Safe and Pleasant;
- Easy to Move Around;
- Welcoming;
- Adaptable; and
- Resource Efficient

A key aspect of delivering its objectives is by the implementation of the road user hierarchy which prioritises walking, cycling and public transport ahead of the private car. In order to achieve this, it identifies that new developments should be navigable and have a good level of connectivity with the surrounding sustainable transport network for all modes of transport.

The current application is for LDP representation and as such the masterplan proposals for the site are indicative only. However, the internal site layout as details emerge as part of any subsequent full planning application would take cognisance of the policies and principles of the Scottish Government's, 'Designing Streets.'

#### 2.2.3 Planning Advice Note 75 - Planning for Transport (2005)

SPP is supported by Planning Advice Note 75 – Planning for Transport (PAN75). In relation to pedestrian provision, PAN75 states in paragraph 65 "*Walking is the most sustainable mode and requires relatively little investment to make it attractive, particularly if planned and designed into a new development. Planning can encourage walking to become the prime mode for shorter journeys through arranging land uses*". PAN75 proceeds in paragraph 68 to state in reference to cycling provision that, "*There is no single correct method for developing suitable cycling infrastructure and for the foreseeable future most cycling will be on the existing road network.*" It then continues to state that consideration, if relevant, should be given to the encouragement of:

- Cycle lanes and networks, especially those radiating direct from proposals;
- Cycle crossing points being provided;
- Covered, secure and well located cycle parking; and
- Changing facilities

PAN75 highlights that the quality of public transport has to be high if drivers are to be encouraged to make use of such services. New developments should be served by public transport from an early stage with high quality infrastructure.

#### 2.2.4 Transport Assessment Guidance (2012)

Transport Assessment Guidance (TAG) (2012) provides guidance on how Transport Assessments, Transport Statements and Travel Plans should be produced and what they should incorporate. It details the importance of establishing the existing transport infrastructure and travel characteristics as well as the development proposal itself and the measures which will be included to improve infrastructure and services to encourage sustainable travel to the site.

TAG indicates that there are various measures of transport accessibility and methods of calculation. Determining the accessibility of a site will require calculating the travel time by different modes of access: walking, cycling, public transport and car. Travel time assessments determine the catchment area of a development by different modes: areas within which one can reach a development within set times or time-bands. Catchment areas for a location can be shown in isochrones on maps. The choice of time-band may vary in response to the use and scale of the development. People may be prepared to travel further for some activities, for example, to a sports stadium than to a shop.

For the purpose of this report, the following travel times for respective travel modes are considered appropriate:

- Walking: Journey times of up to 20-30 minutes
- Cycling: Journey times of up to 30-40 minutes

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- Public transport: Journey times of up to 30 minute door to door

**Chapter 4** of this report examines the accessibility of the site and includes the results of the journey time analysis described above, represented within the production of various isochrones.

## 2.3 Regional Policy

### 2.3.1 SEStran Regional Transport Strategy 2008 – 2023 (2008)

The Regional Transport Strategy (RTS) was produced in 2008 in order to *“set out a clear framework for the future direction of investment in, and management of, transport in the SEStran area for the next 10 – 15 years.”*

In terms of new development, the document identifies the planning system as being vital in managing transport behaviour in future years. It acknowledges that although development results in a dispersal between residential and employment areas, it acknowledges that it allows for opportunities to develop growth in a more sustainable manner; stating that *“it is vital that this new development is planned with a firm perspective on sustainable transport.”*

Policy 20 states that SEStran will pursue measures by which to ensure that major trip generating sites are located in areas that are highly accessible by sustainable modes of travel; particularly walking, cycling and public transport. Where this is not the case, it specifies that measures to address this should be forthcoming.

Policy 21 specifies that SEStran will *“support planning authorities in using their land-use planning process to reduce the need to travel, to promote the provision of non-car access to and within developments and to promote travel plans.”*

The development site currently has limited access to pedestrian routes and public transport. It is considered, however, that with appropriate mitigation measures, and plans for improved rail access discussed later in this report, that access to and travel by sustainable travel modes can be improved.

### 2.3.2 SESplan Strategic Development Plan (2015)

The Strategic Development Plan for South East Scotland, which was approved in 2015, was produced by the six relevant member authorities that make up the SESplan strategic development planning authority, which includes East Lothian Council. It identifies the importance of promoting sustainable modes of transport in light of the heavily trafficked nature of the road network, which it states is already under pressure without additional development.

Policy 8 of it is primarily concerned with transportation and aspires to promote the development of a sustainable transportation network. Directly relevant aspects of the policy aspire to:

- *“ensure that development likely to generate significant travel demand is directed to locations that support travel by public transport, foot and cycle”*
- *“ensure that new development minimises the generation of additional car traffic, including through the application of mode share targets and car parking standards that relate to public transport accessibility.”*
- *“relate density and type of development to public transport accessibility”*
- *“ensure that the design and layout of new development demonstrably promotes non-car modes of travel;”* and
- *“consider the merits of protecting existing and potential traffic-free cycle and walking routes such as disused railways affected by any development proposal.”*

As noted in Section 2.3 above, the development site currently has limited access to pedestrian routes and public transport. It is considered, however, that with appropriate mitigation measures, and plans for improved rail access discussed later in this report, that access to and travel by sustainable travel modes can be improved.

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## 2.4 Local Policy

### 2.4.1 East Lothian Local Development Plan (2016)

The main aims of the Local Development Plan (LDP) are:

- *“Conserve east Lothian’s special qualities for future generations“*
- *“Help grow the local economy, provide more jobs and homes and address infrastructure challenges and inequality“*
- *“Provide sufficient land for new homes can be met whilst delivering more affordable homes“*
- *“Maintain high quality services and infrastructure“*
- *“Ensure adequate infrastructure capacity and an appropriate use of resources“*

The document identifies transportation as necessary to attract economic development and encourage job creation to conveniently access work, education, services, leisure and recreation opportunities, and to allow for the delivery of goods and services and outlines that *“new development should be located so as to allow choice of means of travel and to encourage the use of sustainable transport modes“*.

It is considered that the location of the proposed development in a location that forms a natural extension of the existing boundary of East Linton would suit this policy requirement. East Linton itself is already accessible by public transport from Edinburgh and the other main towns around the area, and the proposed development site would seek to maximise this potential.

Section 1.30 states that there is also support for a new rail station in East Linton. The new rail halt would significantly enhance the village’s accessibility and East Linton would potentially be a 20 min rail journey from Edinburgh.

Section 2.129 of the East Lothian LDP identifies East Linton as one of the most accessible settlements within the Dunbar cluster.

## 2.5 Summary

The development site has limited access to pedestrian routes and public transport. It is considered, however, that with appropriate mitigation measures, and the current plans for improved rail services, that access to and travel by sustainable travel modes can be improved in the town of East Linton and not the proposed development in isolation.

## **The Development Site**

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## 3 The Development Site

### 3.1 Introduction

The following chapter provides a brief summary of the existing site before outlining the development proposals with cognisance to the site layout. The proposed access arrangements for each mode of transport are then discussed.

### 3.2 Existing Site & Potential Development

The site extends approximately 9 hectares and it is located to the north-east of East Linton. It is bounded by Preston Road (B1407) to the north, The Dean housing to the west, Preston Main Farm buildings to the east and woodland to the north. Analysis of the site demonstrates a potential site capacity of up to 150 residential dwellings and supporting infrastructure.

An indicative master planning exercise carried out creates northern and eastern woodland boundaries to edge the development area which would also screen housing from Preston Main Farm buildings.

### 3.3 Site Access

#### 3.3.1 Walking

The development will be linked to the footways at Preston Road (B1407) and also to the unclassified road on the western side of the development. This road connects with a shared-use path to the north of East Linton that would allow residents to walk to the High Street within 20 minutes, avoiding the more trafficked Preston Road (B1407). A review of the pedestrian infrastructure provision along Preston Road (B1407) has identified that some improvement of the existing footways will be required in order to create safer and more comfortable access of the potential development site for pedestrians, and promote it as a viable alternative form of access to the town centre.

#### 3.3.2 Cycling

Infrastructure provision within the development site for cyclists will be provided in the form of shared carriageways. This is considered to be acceptable within the development given the low traffic volumes and vehicle speeds within the site.

#### 3.3.3 Public Transport

Preston Road (B1407), to the south of the development site is a public transport route serving Dunbar and North Berwick. There are also several bus services that connect Dunbar and Edinburgh that serve East Linton.

The Council recognises the importance of rail travel, particularly for accessing the centre of Edinburgh. The LDP highlights that rail studies commissioned in 2004 and 2012 by East Lothian and Scottish Borders Councils concluded that a local service to Dunbar is feasible, with the potential to make stops at other stations in the area. It states that ELC will continue to seek capacity improvements on the east coast rail line for new stations, including at East Linton and for service improvements, particularly to Dunbar and North Berwick.

It is understood that East Lothian Council is currently seeking part capital funding from the Scottish Government in order to provide a new train station at East Linton. Figure 2 overleaf identifies the potential location of the station (with associated car parking) at East Linton, which is safeguarded in the current LDP. Such facilities will increase sustainable access of both East Linton and the wider East Lothian region.

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**Figure 2: Land allocated for East Linton Train Station. Source: Scottish Stations Fund Bid**

3.3.4 Vehicular

The main vehicular access to the proposed development will be principally from Preston Road (B1407) via the A198 and the B1377. Details of proposed new infrastructure are provided in **Chapter 4**.

**3.4 Safe Routes to School**

East Lothian Council operate a Safer Routes to School programme which aims to “promote safer, more environmentally sustainable and healthier ways to travel to and from school.” The scheme is delivered in conjunction with school travel plans and identifies a number of physical infrastructure measures which can improve the number of school pupils can walk or cycle to school from home, including the provision of pedestrian crossings, improved footways and the introduction of traffic calming measures.

Details of routes to school applicable to the site are contained in **Section 3.4** of the report.

**3.5 Development Parking**

3.5.1 Car Parking

The East Lothian Council Standards for Development Roads 2008 sets out the criteria for maximum parking standards for new developments. In general these standards align with those in SPP17 ‘Planning for Transport’ which has now been superseded by the Scottish Planning Policy 2014 (SPP). For general housing, parking standards are dictated by the rates shown in **Table 1**.

<b>Table 1: General Housing Parking Standards</b> <i>(Extract Table 20 of East Lothian Council Standards for Development Roads)</i>		
Area	Number of Rooms per Dwelling	
	Up to 5 Rooms	6 Rooms or more
Council Wide	1 private space + 0.5 communal spaces	2 private spaces + 0.25 communal spaces



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### 3.5.2 Cycle Parking

The parking standards for East Lothian state that cycle parking should consist of a combination of 'Sheffield' style racks, lockers or other secure accommodation where appropriate. For general housing units with a private garage or private rear garden, no cycle parking provision is required. Flats require 1 locker per flat or a secure communal space, whilst any other housing types should have a secure, undercover space for at least one bicycle per unit.

### 3.6 Summary

It has been demonstrated that the site is well positioned to accommodate various modes of transport other than private car use. Plans to provide a new rail station at East Linton in the current development plan period will increase the accessibility of the East Lothian region, and East Linton in particular, by sustainable transport modes.

The principles set out in the Scottish Government's, 'Designing Streets 2010,' policy document would be used in the development of an emerging masterplan for the potential development site at Prestonmains. This will ensure that cycling and pedestrian routes and facilities will be of a high quality and encourage new residents of the development to make sustainable travel choices.

Parking provision within the development site would be in accordance with current standards.

## **Existing Accessibility and Connectivity**

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## 4 Existing Accessibility and Connectivity

### 4.1 Introduction

This chapter contains a detailed assessment of the existing sustainable accessibility of the proposed development site. In accordance with Scottish Planning Policy (2014), this process has been undertaken with consideration of the road user hierarchy whereby more sustainable modes of travel are prioritised ahead of the private car.

### 4.2 Walking Accessibility

Journeys made by foot are the most sustainable method of travel and serve to fulfil all four of the Scottish Government's National Performance Framework (NPF 3, 2014) objectives to promote a low carbon, natural, connected and successful place. TAG (2012) dictates that the existence of well-equipped pedestrian facilities is paramount in encouraging a higher uptake of walking.

The main walking routes facilitating pedestrian access to and within the proposed development site have been investigated, noting lighting provision, typical footway widths and the nature and type of crossing facility where encountered.

#### 4.2.1 Development Walking Catchment

Current transport planning policy provides guidance on the typical distances that pedestrians will walk in order to reach their destination. "PAN 75, Planning for Transport," states that these typical walking distances will be approximately 1600m whilst TAG 2012 works on the basis of journey times and concludes that a 20-30 minute walking time is normally acceptable. In accordance with such requirements, walking isochrones have been prepared which show the area accessible within 20 minutes and 30 minutes time and also the area accessible within 400m, 800m and 1600m walking distance from the site. The isochrones are shown in **Figure 3** and **Figure 4**.

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Figure 3: Walking Isochrones -Time

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**Figure 4: Walking Isochrones – Distance**

It is demonstrated that the development site sits within a 1600m walk distance and within 20 minutes' walk time of all the leisure retail, employment and residential facilities. East Linton Primary School, Smeaton Nursery, East Linton Surgery and East Linton potential train station are also within the 20 minutes walking isochrone and within the 1600m walking isochrone from the proposed development.



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#### 4.2.2 Pedestrian Infrastructure

Most of the amenities, retail and employment facilities within East Linton are located along High Street to the west of the development site. Pedestrians leaving the development site would walk along Preston Road (B1407) for approximately 950m and reach High Street.

Preston Road (B1407) is a two lane single carriageway road and it connects the B1377 Road to the west with Main Street to the east. Its width varies from 7.1m and 4.5m, approximately. From the western edge of the development site, the speed limit along Preston Road (B1407) is set to 30mph.

Footways exist along the northern side of Preston Road (B1407) in most of its length which are in good condition, appropriately lit and with dropped kerbs at the junctions.

The development would incorporate footpath at the southern side of its extension that will link to the footpaths at Preston Road (B1407). From The Dean development to the unclassified road just before Prestonkirk Church the footpath is continuous and approximately 1.6m width. Along Prestonkirk, the footpath narrows to 0.8m. To the north of the footpath there is a stone retaining wall which forms the boundary of the church yard and makes walking less comfortable or safe for pedestrians (see **Photograph 1**). Just after Prestonkirk Church, there is a section of approximately 20m in length where the footpath is interrupted (see **Photograph 2**). From there to High Street, the footpath width varies between 1.8m and 1.3m.



**Photograph 1: Footpath at Prestonkirk Church**

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**Photograph 2: Section without Footpath at Preston Road (B1407)**

High Street is a two lane single carriageway road of approximately 10 m width. It incorporates footpaths at both sides of the road. The footpaths are of a good standard, continuous and lit.

### **4.3 Cycling Accessibility**

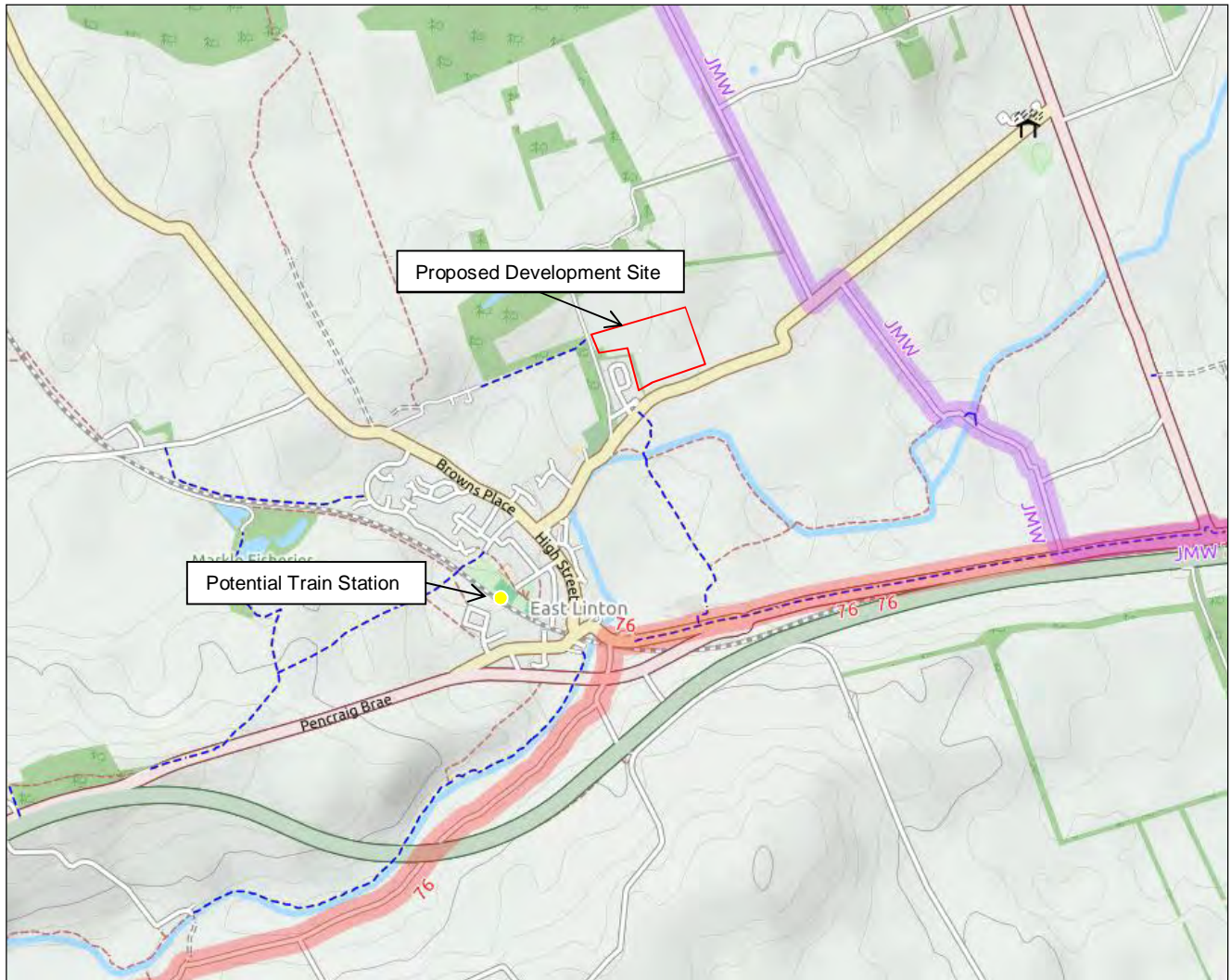
The Cycling Action Plan for Scotland, published in 2010, outlines a vision whereby *“by 2020, 10% of all journeys in Scotland will be by bike.”* As SPP outlines, a key aspect of delivering this can be achieved by ensuring cyclists are considered within the design and location of development at an early stage to ensure they are easily accessible by bicycle and are complimented by appropriate cycle routes, parking and storage facilities. To comply with this, the nature of cycling facilities within the vicinity of the development site has been reviewed, and appropriate cycling isochrones prepared.

#### **4.3.1 Development Cycling Catchment**

Within East Linton there are currently no dedicated cycle facilities, however cyclists would be able to share use of the carriageway space with other road users given the low traffic volumes and vehicle speeds within the site. Alternatively, cyclists could make use of the off-road paths around the area. Sustrans Route 76 runs through East Linton what make possible to cycle to Edinburgh, 25 miles away, linking country roads or cycleways. There is a path running south from the development that connects with Route 76. **Figure 5** shows a series of on and off street routes which are considered suitably safe for cycling and are available within the immediate vicinity of the site;



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**Figure 5: Cycle Paths within the Area**

TAG (2012) states that an acceptable journey time by bike to and from any new development site is between 30 to 40 minutes. Clearly the speed and ability of a cyclist as well as the relief of the land will dictate the distance which can be suitably reached within such a timeframe. However, assuming an average cycle speed of 10kph, this being an assumed average of all cycling abilities, this results in a distance of 5km. In accordance with such criteria, a 5km cycling isochrone has been prepared and is contained within **Figure 6**.



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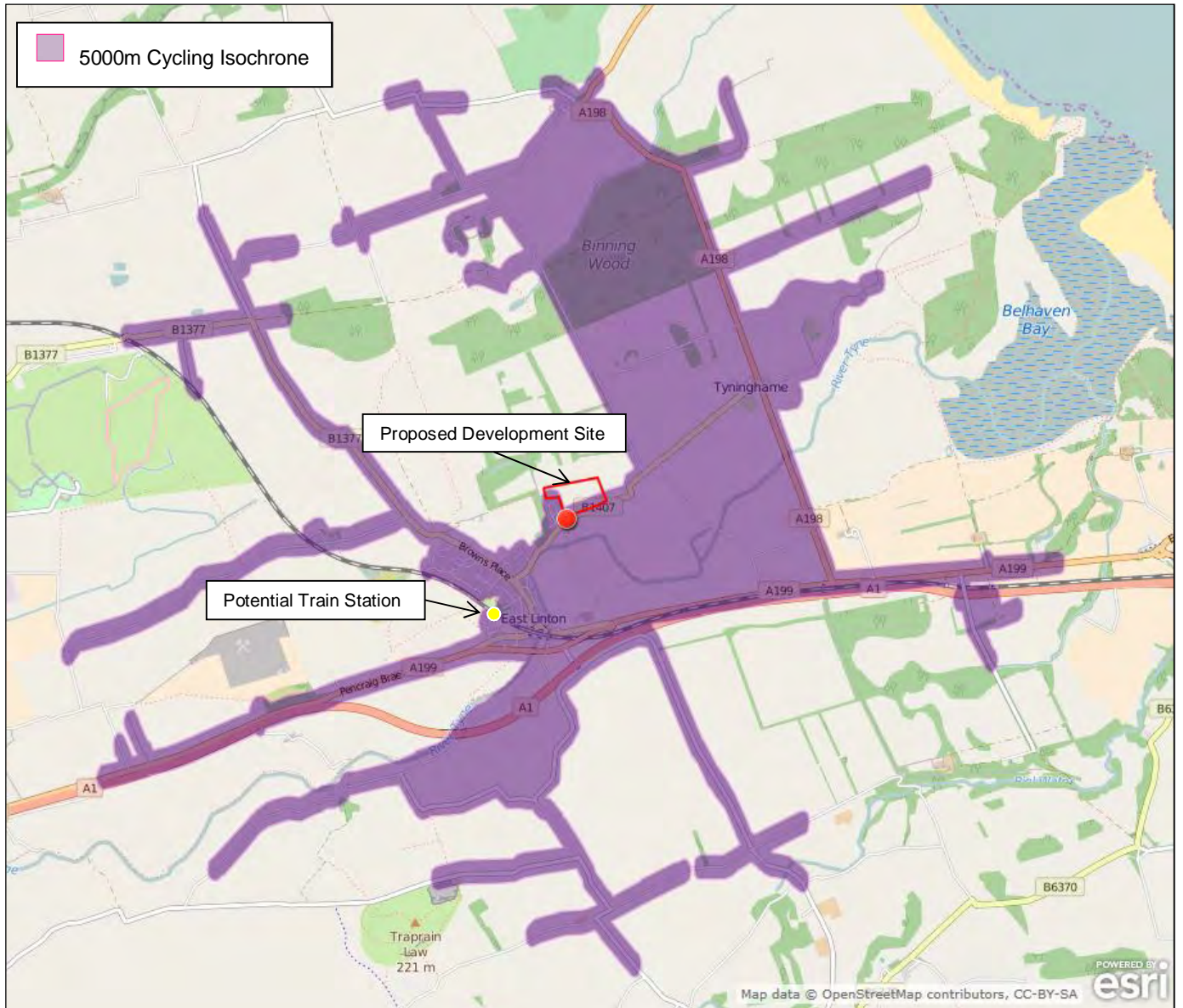


Figure 6: Cycling Isochrone

Figure 6 demonstrates that the entire conurbation of East Linton lies within the 5km cycling isochrones. This places all the leisure, retail, employment and residential facilities within cycling distance of the proposed development.

#### 4.4 Public Transport Accessibility

SPP (2014) outlines the requirement that new developments are located in areas that are accessible by public transport so as to promote a real alternative to accessing a development by car. In addition to this, the East Lothian Local Plan states that major travel generating sites should be located in areas which are “highly accessible” by public transport. To this end, bus and rail infrastructure and routing available within proximity to the site has been reviewed, noting the existing infrastructure available and the frequency of routing.

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4.4.1 Bus

SPP (2014) identifies that all new developments should be located within a 400m of a public transport network so as to ensure a good level of access to local facilities. In accordance with these criteria, a plan detailing the existing bus infrastructure and routing that is available within such a walking catchment is provided within **Figure 7** and **Figure 8** below.



Figure 7: Bus Stops

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Figure 8: Bus Routes

Table 2 shows the bus services at East Linton.



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Table 2: East Linton Bus Services				
Service	Route	Days	Typical Frequency	Operator
120	Dunbar – North Berwick	Monday – Sunday	Every 2 hours (twice a day on Sundays)	EVE
106	Edinburgh – Musselburgh – Tranent – Haddington – East Linton – Dunbar	Monday – Sunday	Twice in the AM peak period and each 50 min after 6PM	FIRST
253	Berwick – Dunbar – East Linton – Haddington – Edinburgh	Monday – Sunday	Hourly peak periods, every 2 hours inter-peaks (3 a day on Sundays)	PERRYMANS / FIRST
X6	Edinburgh – Haddington – East Linton – Dunbar	Monday – Sunday	Hourly	FIRST
X8	Edinburgh – Tranent – Haddington	Monday – Sunday	Every 30 min	FIRST

There are four bus stops in proximity to the development area for the 120 service to Dunbar and North Berwick. The bus stops for the remaining bus services are located at the southern end of Bridge Street (see **Table 3**). As shown in Figure 1, the bus stops for the services above are within the 20 minute walking isochrones from the proposed development.

Table 3: East Linton Bus Stops	
Bus Stop	Services
Smithy/ Main Street (Both directions)	120
Stories Park / High Street (Both directions)	120
Bridgend Hotel / Station Road (Both directions)	120, 106, 253, X6, X8

#### 4.5 Vehicular Accessibility

The principle vehicular access to the development would be from Preston Road (B1407). Preston Road (B1407) is a two-lane single carriageway road subject to a 30mph speed limit at the gateway to the current built up area near The Deans, illustrated by **Photograph 3** overleaf. Beyond this point, to the east, the speed limit increases to the national limit for the type of road. However the geometry of the road is not conducive to vehicles travelling at that speed, with a sharp s-bend located approximately 600m east, adjacent to Prestonmains Farm. Given that proposed development site would extend the limit of the built up area it would be prudent to consider the extension of the current 30 mph speed limit to include the frontage of the site, or a reduction to 40mph in the least.

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Vehicular access routes to the site are from Tynninghame to the east via the A198/Preston Road junction (illustrated by **Photograph 4** overleaf) and from East Linton village to the west via the B1377/Preston Road junction (illustrated by **Photograph 5** overleaf). Both junctions operate as priority junctions with low flow demands. The visibility is good at both junctions.



**Photograph 3: Preston Road (B1407)**

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**Photograph 4: A198/Preston Road Junction**



**Photograph 5: B1377/Preston Road Junction**

#### **4.6 Summary**

This chapter has considered the accessibility of the site by all modes of transport and the existing transport network in the area around East Linton. It is considered that there is good potential to facilitate and encourage travel to the housing development by sustainable modes of transport considering the levels of public transport in the area and the foot and cycle path.

The site is within walking distance of East Linton centre and also to the bus stops linking Dunbar, Edinburgh and other surrounding localities. It is also in close proximity of a number of shared-use paths and connected to the Sustran Cycling Route 76.

## **Future Accessibility**

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## 5 Future Accessibility

### 5.1 People Based Trip Assessment

Transport Assessment Guidance 2012 states that a Transport Statement should include an estimation of the number of people who will travel from a proposed residential development site.

There are several methods and sources by which estimations can be made as to the likely number of people trips to a development; one of which uses the Trip Rate Information Computer System (TRICS) database. The TRICS database includes vehicular and multi-modal surveys of various types from existing developments around the UK.

In accordance with the TRICS Good Practice Guide, the most important data field in terms of site compatibility is the locational type and not the specific demographic characteristics of the region. Sites in a town centre with a good level of public transport access and a permeable walking environment would naturally achieve a more sustainable modal split that a development that is located within a rural area.

By narrowing search criteria that closely matches the residential development proposal, trip rates have been extracted and applied to proposals in order to estimate the number of multi-modal trips. The selection criterion has excluded developments located within Greater London and the South East and sites within city centre and inner city locations.

#### 5.1.1 Modal Split

In order to develop multi-modal trip rates, census data has been used. For the residential element of the development, 2011 Census travel to work data from Table QS702SC has been used for Output Area S00102533, S00102534 and S00102535 in which the Dunder Road - Rennie Place - Longstone Avenue residential estate is located. These have been verified against the modal split for East Linton as a whole and the modal split for Output Area S00101793, in which the development site is located. Analysis of the results determined that the development would be more likely to have a similar mode share to that of the development at Dunder Road. The modal split resulting from these is shown below in **Table 4**.

Table 4: Residential Mode Share	
Mode	Mode Share
Train	4.3%
Bus	15.6%
Car Driving	57.8%
Car Passenger	4.7%
Bicycle	3.8%
On foot	12.8%
Other	0.95%

#### 5.1.2 Multi-Modal People Trip Assessment

A number of methods have been considered in order to develop a robust trip generation for the proposed development site. Firstly the TRICS database has been interrogated to establish a set of "best fit" trip rates and these are shown in **Table 5** below. Full TRICS outputs are provided in **Appendix A**. Secondly, as part of the data collection exercise the access to Dunder Road - Rennie Place - Longstone Avenue residential estate was surveyed. Using the data collected and knowledge of the number of residential units using the access it was possible to determine an observed trip rate for an existing residential area in East Linton of suitable scale. The derived trip rates are included in **Table 5** as a comparison to the results of the TRICS data analysis. These trip rates have been shared with East Lothian Council through earlier scoping discussions.



Capabilities on project:  
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Table 5: Vehicular Trip Rates							
Land Use	Source	Trip Rates					
		AM Peak			PM Peak		
		In	Out	Total	In	Out	Total
Housing (per unit)	TRICS	0.117	0.403	0.520	0.373	0.247	0.620
	Observed	0.153	0.380	0.533	0.358	0.124	0.482

The modal splits in **Table 5** above have been applied to the trip rates in **Table 6** to derive equivalent people trip rates. People trip rates for the development are shown in **Table 7**.

Table 6: Vehicular Trip Rates by Vehicle Type							
Land Use	Mode	Trip Rates					
		AM Peak			PM Peak		
		In	Out	Total	In	Out	Total
Housing (per Unit)	Train	0.009	0.030	0.038	0.028	0.018	0.046
	Bus	0.032	0.109	0.141	0.101	0.067	0.168
	Car Driving	0.117	0.403	0.520	0.373	0.247	0.620
	Car Passenger	0.010	0.033	0.043	0.031	0.020	0.051
	Bicycle	0.008	0.026	0.034	0.024	0.016	0.041
	On foot	0.026	0.089	0.115	0.083	0.055	0.137
	Other	0.002	0.007	0.009	0.006	0.004	0.010

**Table 7** shows the number of trips by each mode of transport that will be generated by the proposed development site using the trip rates in **Table 6**.

Capabilities on project:  
Transportation

Table 7: Vehicular Trips							
Land Use	Mode	Trip Rates					
		AM Peak			PM Peak		
		In	Out	Total	In	Out	Total
Housing (150 Units)	Train	1	4	6	4	3	7
	Bus	5	16	21	15	10	25
	Car Driving	18	60	78	56	37	93
	Car Passenger	1	5	6	5	3	8
	Bicycle	1	4	5	4	2	6
	On foot	4	13	17	12	8	21
	Other	0	1	1	1	1	2

## 5.2 Proposed Pedestrian Infrastructure

As described earlier there are existing footways running along the northern side of Preston which are in good condition with widths typically ranging between 1.5m and 2m.

At Prestonkirk Parish Church the footway narrows to 0.8m a significant pinch point in the network for pedestrians. In order to address this, a potential traffic management scheme has been developed which introduces shuttle signals enabling the road carriageway to be narrowed to provide a single vehicle running lane of 3.8m wide and a widened footway of 2m as it passes the kirk yard.

The eastern of the northern footway coincides with the limit of the current built up area. This would require to be extended along the frontage of the site including dropped crossing areas at the site access junction.

AECOM sketch 60485328/SKE/C/001 illustrates the proposed footway improvements.

## 5.3 Proposed Cycle Infrastructure

Given the high level of cycle infrastructure in the area and the good levels of accessibility throughout East Linton, and beyond, there is not considered to be any need to upgrade cycle facilities beyond that which is already in place.

## 5.4 Proposed Public Transport Infrastructure

As highlighted in the previous Chapter, at present the nearest bus stops are located in town on the High Street just south of Stories Park, despite there being a bus service (Eves) which travels along Preston Road (B1407). As part of the development proposals consideration will be given to providing new bus stop infrastructure on Preston Road (B1407) in the vicinity of the site along with discussing with the local operator, the viability of increasing the service frequency particularly at peak times.

## 5.5 Safe Routes to School

Pupils would be able to travel through the development making use of the shared surfaces and footpaths connecting through to the footways on Preston Road (B1407). From this point pupils are able to navigate safely along the north side of Preston Road (B1407) using the proposed new footway along the site frontage connecting to the existing footway network and proposed improved pedestrian facilities at the Prestonkirk Parish Church towards the High Street.

## 5.6 Access Junction Appraisal

Vehicular access to the development site would be taken from a priority controlled junction located on Preston Road (B1407). The exact location of the proposed development access is shown in **Figure 9** and illustrated by AECOM Sketch

Capabilities on project:  
Transportation

60485328/SKE/C/002 in **Appendix B**. The visibility from this site is good (X-Distance = 4.5m x Y-Distance = 90m) as it is located on a reasonably straight section of Preston Road (B1407), at the top of a small hill. This is illustrated by **Photograph 6**.

Reducing the current speed limit on Preston Road to 40mph or less, in combination with the extent of available site frontage will permit the introduction of an additional site access junction if deemed necessary.



Figure 9: Development Access



Photograph 6: Visibility from the Proposed Development Access

Capabilities on project:  
Transportation

### 5.7 Road Safety

Accident statistics for the years 2009 to 2014 have been obtained from the Department for Transport, Road Safety online database for the roads in the vicinity of East Linton. The locations of these accidents are shown in **Figure 10**.

There have been no serious or fatal incidents in the study area in the latest five years. However, there have been four slight incidents at High Street, other one at Station Road, and at the junctions of Station Road with the A199.



Figure 10: Incidents within the Study Area

Capabilities on project:  
Transportation

## 5.8 Proposed Road Infrastructure

Given the scale of the potential development site it is not envisaged at this stage, with the exception of improvements to the pedestrian infrastructure linking the site to the High Street and surrounding amenities, and site access junction(s), that any significant off-site mitigation works would be required to support the development.

Notwithstanding this, more detailed consideration of any development impact would need to be considered as part of an emerging planning application to support more definitive site proposals.

## 5.9 Car Parking Provision

As detailed in Section 3.5.1, The East Lothian Council Standards for Development Roads 2008 sets out the criteria for maximum parking standards for new developments. In general these standards align with those in SPP17 'Planning for Transport' which has now been superseded by the Scottish Planning Policy 2014 (SPP). For general housing, parking standards are dictated by the rates shown in **Table 10**.

<b>Table 10: General Housing Parking Standards</b> <i>(Extract Table 20 of East Lothian Council Standards for Development Roads)</i>		
<b>Area</b>	<b>Number of Rooms per Dwelling</b>	
	<b>Up to 5 Rooms</b>	<b>6 Rooms or more</b>
<b>Council Wide</b>	1 private space + 0.5 communal spaces	2 private spaces + 0.25 communal spaces

Assuming that the development would incorporate houses of up to 5 rooms, the maximum standard would be up to 150 private units and 75 communal spaces

### 5.9.1 Cycle Parking

As detailed in Section 3.5.1, the parking standards for East Lothian state that cycle parking should consist of a combination of 'Sheffield' style racks, lockers or other secure accommodation where appropriate. For general housing units with a private garage or private rear garden, no cycle parking provision is required. Flats require 1 locker per flat or a secure communal space, whilst any other housing types should have a secure, undercover space for at least one bicycle per unit.

## **Travel Plan Framework**

## 6 Travel Plan Framework

### 6.1 Introduction

'Travel Plan' is the generic term used to encompass a package of initiatives and measures to encourage sustainable modes of travel by reducing the dependency on single-occupancy car use. The resultant effect is that a Travel Plan provides a strategy to reduce transportation impact and influence travel behaviour. A Travel Plan will be tailored to the type of organisation for which it is being prepared. An employment development where the occupier has a greater degree of influence on the travel behaviour of the employees will have a formal Travel Plan process where the staff is constantly encouraged to travel by sustainable modes of travel, regular surveys and reviews are carried out and measures and policies are constantly updated. Developments in which the majority of trips are customer focussed, such as retail and leisure facilities, will have different travel plans that seek to affect staff travel in the same way that other employment sites will seek to encourage customers to travel by sustainable means wherever possible. A Travel Plan approach to residential development which is applicable in the case of Preston Mains site differs again as there is no organisation overseeing the development and the process is about informing residents of the options available to them, encouraging them to make informed travel choices and ensuring that the best travel practice is set in residents minds from the outset.

A Travel Plan will aim to:

- Encourage the use of sustainable modes of transport; and
- Reduce the percentage of single occupancy journeys.

### 6.2 Why is a Travel Plan Required?

Traffic congestion is becoming an increasingly important subject for everyone as traffic is perceived to be taking over our towns and cities and having a detrimental impact on both our environment and our health. The consequences of continuing road traffic growth include:

- The costs to society and business of congestion, delays and unreliable journey times;
- Road casualties;
- Emissions of pollutants affecting health;
- Emissions of Carbon Dioxide, the main "greenhouse gas" contributing to global warming;
- Noise;
- Visual intrusion;
- Adverse effects on sensitive sites and areas; and
- Poorer health as a result of reduced levels of activity due to greater reliance on the car.

In order to improve upon the current situation, many local authorities now request a Travel Plan be prepared in order to minimise and manage vehicular traffic generated by new development. With residential developments the extent to which residents can be influenced is limited and many travel decisions will be based on the destination and measures there. There is however the opportunity to ensure that residents make informed travel choices and are fully aware of the infrastructure and services surrounding their homes.

### 6.3 Travel Plan Process

For a residential development the Travel Plan process has to take account of there being no overall body controlling all the units and all the eventual occupiers. To that end the residential Travel Plan process must ensure, primarily through the Transport Statement / Assessment process, that the development has adequate connectivity to all surrounding infrastructure and public transport services. Moving from this the provision of adequate information to residents to allow them to make informed travel choices is an essential part in the Travel Plan process.



Capabilities on project:  
Transportation

#### **6.4 Developer Commitment**

The Developer recognises the importance of reducing the potential negative transport related impacts of the potential development site and the need to provide for a range of sustainable travel options as an alternative to car use.

To this end the Developer, along with East Lothian Council, up to the point that their obligations on the Travel Plan pass to a property occupier would be committed to implementing the measures contained within the Travel Plan in order to provide residents with the information they require to make sustainable travel choices.

#### **6.5 Specific Measures**

Residential travel packs would be prepared for every new dwelling in the development. A pack would contain information about the travel options that are available to residents, allowing them to make informed travel choices. Information would be provided relating to public transport services in East Linton, walking and cycling routes in the area, including links to longer distance routes. Maps would be included showing the locations of facilities and the routes to reach them using sustainable modes of travel. Indications of journey time and distance information could also be provided in these information leaflets.

#### **6.6 Summary**

The development of a Travel Plan for the potential development site would form part of an ongoing process aimed at the promotion of sustainable travel modes over private car use. This chapter has presented a Travel Plan framework for a typical residential development, outlining key stages to the implementation of a plan and the measures which may be considered.



## **Summary and Conclusions**

## 7 Summary and Conclusions

### 7.1 Summary

The proposed development sits on the eastern edge of the existing built up area in the northeast of East Linton, East Lothian. It is bounded by Preston Road (B1407) to the south, The Dean housing to the west and Preston Main farm building to the east. The potential capacity of the development site is up to 150 units, including a range of housing and on site affordable provision.

The relevant National, Regional and Local Transport Planning Policy has been reviewed in order to ensure the development proposals meet the requirements and guidelines set out by the Scottish Government, associated National Bodies and East Lothian Council. Particular importance has been placed on policy relating to sustainable modes of transport and a desired shift away from private car travel where possible.

The development site has limitations in terms of its accessibility on foot and public transport which in the short term may limit its potential capacity. It is considered, however, that with the proposed mitigation measures, and ongoing plans for improved rail access via a new station at East Linton, that access to and travel by sustainable travel modes can be improved.

The site is in close proximity to parts of the Sustran cycling Route 76.

In order to support the potential development site, proposed improvements to pedestrian access have been identified. These include a new footway along the frontage of the site connecting into the existing northern footway of Preston Road (B1407) which currently stops just west of the site boundary and traffic management measures which will enable the provision of a widened footway at Prestonkirk Parish Church which was identified as a particular pinch point in the pedestrian network.

Vehicular access to the site is proposed via priority controlled junction on Preston Road (B1407). By reducing the speed on Preston Road along the site frontage, in combination with the extent of the frontage itself, presents the opportunity to provide an additional site access junction should it be deemed necessary.

The internal site layout will be based on the principles set out in the Scottish Governments, 'Designing Streets' policy document and the 'SCOTS National Development Roads Guide'.

In accordance with Transport Assessment Guidance 2012, a People Trip Assessment has been undertaken which shows that significant proportions of prospective residents are likely to travel to work or their place of study using public transport, bicycle or on foot.

The development of a Travel Plan for the development will form part of an ongoing process aimed at the promotion of sustainable travel modes over private car use. A Travel Plan framework has been developed as part of the report in order to set out the requirements of a Travel Plan which will meet the needs of residents and visitors to the development site whilst encouraging a shift away from single occupancy private car use.

### 7.2 Conclusion

The TS has considered all aspects of travel to, from and through the potential development site. Given the potential scale of development, it demonstrates that the proposed development site could be supported by the existing road infrastructure with the suggested improvements identified in the statement and that at this stage there are considered to be no significant transportation reasons to prevent this site from being included in the emerging development plan.

Capabilities on project:  
Transportation

## Appendix A – TRICS Output

**TRIP RATE CALCULATION SELECTION PARAMETERS:**

Land Use : 03 - RESIDENTIAL  
 Category : A - HOUSES PRIVATELY OWNED

**VEHICLES**Selected regions and areas:

<b>03</b>	<b>SOUTH WEST</b>	
	DC DORSET	1 days
<b>07</b>	<b>YORKSHIRE &amp; NORTH LINCOLNSHIRE</b>	
	NY NORTH YORKSHIRE	4 days
<b>08</b>	<b>NORTH WEST</b>	
	CH CHESHIRE	2 days
<b>11</b>	<b>SCOTLAND</b>	
	HI HIGHLAND	1 days
<b>16</b>	<b>ULSTER (REPUBLIC OF IRELAND)</b>	
	DN DONEGAL	3 days

This section displays the number of survey days per TRICS® sub-region in the selected set

**Filtering Stage 2 selection:**

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Number of dwellings  
 Actual Range: 17 to 174 (units: )  
 Range Selected by User: 4 to 400 (units: )

Public Transport Provision:

Selection by: Monday-Friday 0700-1900  
 Include days where PT not known: Yes  
 Range: 5 to 24

Date Range: 01/01/07 to 11/05/15

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	2 days
Tuesday	3 days
Wednesday	3 days
Friday	3 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	11 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Suburban Area (PPS6 Out of Centre)	4
Edge of Town	7

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone	9
No Sub Category	2

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

**Filtering Stage 3 selection:**Use Class:

C3 11 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 1 mile:

1,001 to 5,000	3 days
5,001 to 10,000	2 days
10,001 to 15,000	4 days
20,001 to 25,000	1 days
25,001 to 50,000	1 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	6 days
25,001 to 50,000	1 days
50,001 to 75,000	1 days
100,001 to 125,000	2 days
250,001 to 500,000	1 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

1.1 to 1.5 11 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

No 11 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

LIST OF SITES relevant to selection parameters

<b>1</b>	<b>CH-03-A-02</b>	<b>HOUSES/FLATS</b>	<b>CHESHIRE</b>
	SYDNEY ROAD		
	CREWE		
	Edge of Town		
	Residential Zone		
	Total Number of dwellings:	174	
	Survey date: TUESDAY	14/10/08	Survey Type: MANUAL
<b>2</b>	<b>CH-03-A-05</b>	<b>DETACHED</b>	<b>CHESHIRE</b>
	SYDNEY ROAD		
	SYDNEY		
	CREWE		
	Edge of Town		
	Residential Zone		
	Total Number of dwellings:	17	
	Survey date: TUESDAY	14/10/08	Survey Type: MANUAL
<b>3</b>	<b>DC-03-A-01</b>	<b>DETACHED</b>	<b>DORSET</b>
	ISAACS CLOSE		
	POOLE		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total Number of dwellings:	51	
	Survey date: WEDNESDAY	16/07/08	Survey Type: MANUAL
<b>4</b>	<b>DN-03-A-03</b>	<b>DETACHED/SEMI-DETACHED</b>	<b>DONEGAL</b>
	THE GRANGE		
	GLENCAR IRISH		
	LETTERKENNY		
	Edge of Town		
	Residential Zone		
	Total Number of dwellings:	50	
	Survey date: MONDAY	01/09/14	Survey Type: MANUAL
<b>5</b>	<b>DN-03-A-04</b>	<b>SEMI-DETACHED</b>	<b>DONEGAL</b>
	GORTLEE ROAD		
	GORTLEE		
	LETTERKENNY		
	Edge of Town		
	Residential Zone		
	Total Number of dwellings:	83	
	Survey date: FRIDAY	26/09/14	Survey Type: MANUAL
<b>6</b>	<b>DN-03-A-05</b>	<b>DETACHED/SEMI-DETACHED</b>	<b>DONEGAL</b>
	GORTLEE ROAD		
	GORTLEE		
	LETTERKENNY		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total Number of dwellings:	146	
	Survey date: WEDNESDAY	03/09/14	Survey Type: MANUAL
<b>7</b>	<b>HI-03-A-14</b>	<b>SEMI-DETACHED</b>	<b>HIGHLAND</b>
	CALEDONIAN ROAD		
	DALNEIGH		
	INVERNESS		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total Number of dwellings:	73	
	Survey date: FRIDAY	13/05/11	Survey Type: MANUAL



LIST OF SITES relevant to selection parameters (Cont.)

<b>8</b>	<b>NY-03-A-05</b>	<b>HOUSES AND FLATS</b>	<b>NORTH YORKSHIRE</b>
	BOROUGHBRIDGE ROAD		
	RIPON		
	Edge of Town		
	No Sub Category		
	Total Number of dwellings:	71	
	Survey date: MONDAY	22/09/08	Survey Type: MANUAL
<b>9</b>	<b>NY-03-A-06</b>	<b>BUNGALOWS &amp; SEMI DET.</b>	<b>NORTH YORKSHIRE</b>
	HORSEFAIR		
	BOROUGHBRIDGE		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total Number of dwellings:	115	
	Survey date: FRIDAY	14/10/11	Survey Type: MANUAL
<b>10</b>	<b>NY-03-A-07</b>	<b>DETACHED &amp; SEMI DET.</b>	<b>NORTH YORKSHIRE</b>
	CRAVEN WAY		
	BOROUGHBRIDGE		
	Edge of Town		
	No Sub Category		
	Total Number of dwellings:	23	
	Survey date: TUESDAY	18/10/11	Survey Type: MANUAL
<b>11</b>	<b>NY-03-A-11</b>	<b>PRIVATE HOUSING</b>	<b>NORTH YORKSHIRE</b>
	HORSEFAIR		
	BOROUGHBRIDGE		
	Edge of Town		
	Residential Zone		
	Total Number of dwellings:	23	
	Survey date: WEDNESDAY	18/09/13	Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**VEHICLES****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	11	75	0.051	11	75	0.214	11	75	0.265
08:00 - 09:00	11	75	0.117	<b>11</b>	<b>75</b>	<b>0.403</b>	11	75	0.520
09:00 - 10:00	11	75	0.190	11	75	0.197	11	75	0.387
10:00 - 11:00	11	75	0.182	11	75	0.183	11	75	0.365
11:00 - 12:00	11	75	0.142	11	75	0.186	11	75	0.328
12:00 - 13:00	11	75	0.211	11	75	0.208	11	75	0.419
13:00 - 14:00	11	75	0.215	11	75	0.201	11	75	0.416
14:00 - 15:00	11	75	0.228	11	75	0.226	11	75	0.454
15:00 - 16:00	11	75	0.283	11	75	0.206	11	75	0.489
16:00 - 17:00	11	75	0.292	11	75	0.208	11	75	0.500
17:00 - 18:00	<b>11</b>	<b>75</b>	<b>0.373</b>	11	75	0.247	<b>11</b>	<b>75</b>	<b>0.620</b>
18:00 - 19:00	11	75	0.312	11	75	0.196	11	75	0.508
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.596			2.675			5.271

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected:	17 - 174 (units: )
Survey date date range:	01/01/07 - 11/05/15
Number of weekdays (Monday-Friday):	11
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**TAXIS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	11	75	0.000	11	75	0.004	11	75	0.004
08:00 - 09:00	11	75	0.006	11	75	0.006	11	75	0.012
09:00 - 10:00	11	75	0.004	11	75	0.005	11	75	0.009
10:00 - 11:00	11	75	0.004	11	75	0.002	11	75	0.006
11:00 - 12:00	11	75	0.006	11	75	0.010	11	75	0.016
12:00 - 13:00	11	75	0.010	<b>11</b>	<b>75</b>	<b>0.011</b>	11	75	0.021
13:00 - 14:00	11	75	0.007	11	75	0.004	11	75	0.011
14:00 - 15:00	11	75	0.007	11	75	0.004	11	75	0.011
15:00 - 16:00	11	75	0.006	11	75	0.006	11	75	0.012
16:00 - 17:00	11	75	0.008	11	75	0.008	11	75	0.016
17:00 - 18:00	11	75	0.007	11	75	0.007	11	75	0.014
18:00 - 19:00	<b>11</b>	<b>75</b>	<b>0.013</b>	11	75	0.011	<b>11</b>	<b>75</b>	<b>0.024</b>
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.078			0.078			0.156

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

**Parameter summary**

Trip rate parameter range selected:	17 - 174 (units: )
Survey date date range:	01/01/07 - 11/05/15
Number of weekdays (Monday-Friday):	11
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**OGVS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	11	75	0.000	11	75	0.000	11	75	0.000
08:00 - 09:00	11	75	0.001	11	75	0.000	11	75	0.001
09:00 - 10:00	11	75	0.001	11	75	0.002	11	75	0.003
10:00 - 11:00	<b>11</b>	<b>75</b>	<b>0.010</b>	<b>11</b>	<b>75</b>	<b>0.007</b>	<b>11</b>	<b>75</b>	<b>0.017</b>
11:00 - 12:00	11	75	0.002	11	75	0.002	11	75	0.004
12:00 - 13:00	11	75	0.001	11	75	0.002	11	75	0.003
13:00 - 14:00	11	75	0.001	11	75	0.000	11	75	0.001
14:00 - 15:00	11	75	0.004	11	75	0.006	11	75	0.010
15:00 - 16:00	11	75	0.004	11	75	0.004	11	75	0.008
16:00 - 17:00	11	75	0.001	11	75	0.000	11	75	0.001
17:00 - 18:00	11	75	0.000	11	75	0.000	11	75	0.000
18:00 - 19:00	11	75	0.000	11	75	0.000	11	75	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.025			0.023			0.048

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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**Parameter summary**

Trip rate parameter range selected: 17 - 174 (units: )  
 Survey date date range: 01/01/07 - 11/05/15  
 Number of weekdays (Monday-Friday): 11  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys manually removed from selection: 0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**PSVS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	11	75	0.000	11	75	0.000	11	75	0.000
08:00 - 09:00	<b>11</b>	<b>75</b>	<b>0.012</b>	<b>11</b>	<b>75</b>	<b>0.012</b>	<b>11</b>	<b>75</b>	<b>0.024</b>
09:00 - 10:00	11	75	0.002	11	75	0.002	11	75	0.004
10:00 - 11:00	11	75	0.000	11	75	0.000	11	75	0.000
11:00 - 12:00	11	75	0.002	11	75	0.002	11	75	0.004
12:00 - 13:00	11	75	0.000	11	75	0.000	11	75	0.000
13:00 - 14:00	11	75	0.001	11	75	0.001	11	75	0.002
14:00 - 15:00	11	75	0.005	11	75	0.005	11	75	0.010
15:00 - 16:00	11	75	0.011	11	75	0.011	11	75	0.022
16:00 - 17:00	11	75	0.001	11	75	0.001	11	75	0.002
17:00 - 18:00	11	75	0.000	11	75	0.000	11	75	0.000
18:00 - 19:00	11	75	0.000	11	75	0.000	11	75	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.034			0.034			0.068

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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**Parameter summary**

Trip rate parameter range selected:	17 - 174 (units: )
Survey date date range:	01/01/07 - 11/05/15
Number of weekdays (Monday-Friday):	11
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**CYCLISTS****Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	11	75	0.007	<b>11</b>	<b>75</b>	<b>0.023</b>	11	75	0.030
08:00 - 09:00	11	75	0.007	11	75	0.015	11	75	0.022
09:00 - 10:00	11	75	0.008	11	75	0.002	11	75	0.010
10:00 - 11:00	11	75	0.010	11	75	0.007	11	75	0.017
11:00 - 12:00	11	75	0.006	11	75	0.005	11	75	0.011
12:00 - 13:00	11	75	0.010	11	75	0.013	11	75	0.023
13:00 - 14:00	11	75	0.007	11	75	0.010	11	75	0.017
14:00 - 15:00	11	75	0.011	11	75	0.001	11	75	0.012
15:00 - 16:00	11	75	0.007	11	75	0.004	11	75	0.011
16:00 - 17:00	11	75	0.012	11	75	0.022	<b>11</b>	<b>75</b>	<b>0.034</b>
17:00 - 18:00	<b>11</b>	<b>75</b>	<b>0.019</b>	11	75	0.007	11	75	0.026
18:00 - 19:00	11	75	0.015	11	75	0.004	11	75	0.019
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.119			0.113			0.232

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**Parameter summary**

Trip rate parameter range selected:	17 - 174 (units: )
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Number of weekdays (Monday-Friday):	11
Number of Saturdays:	0
Number of Sundays:	0
Surveys manually removed from selection:	0

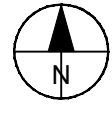
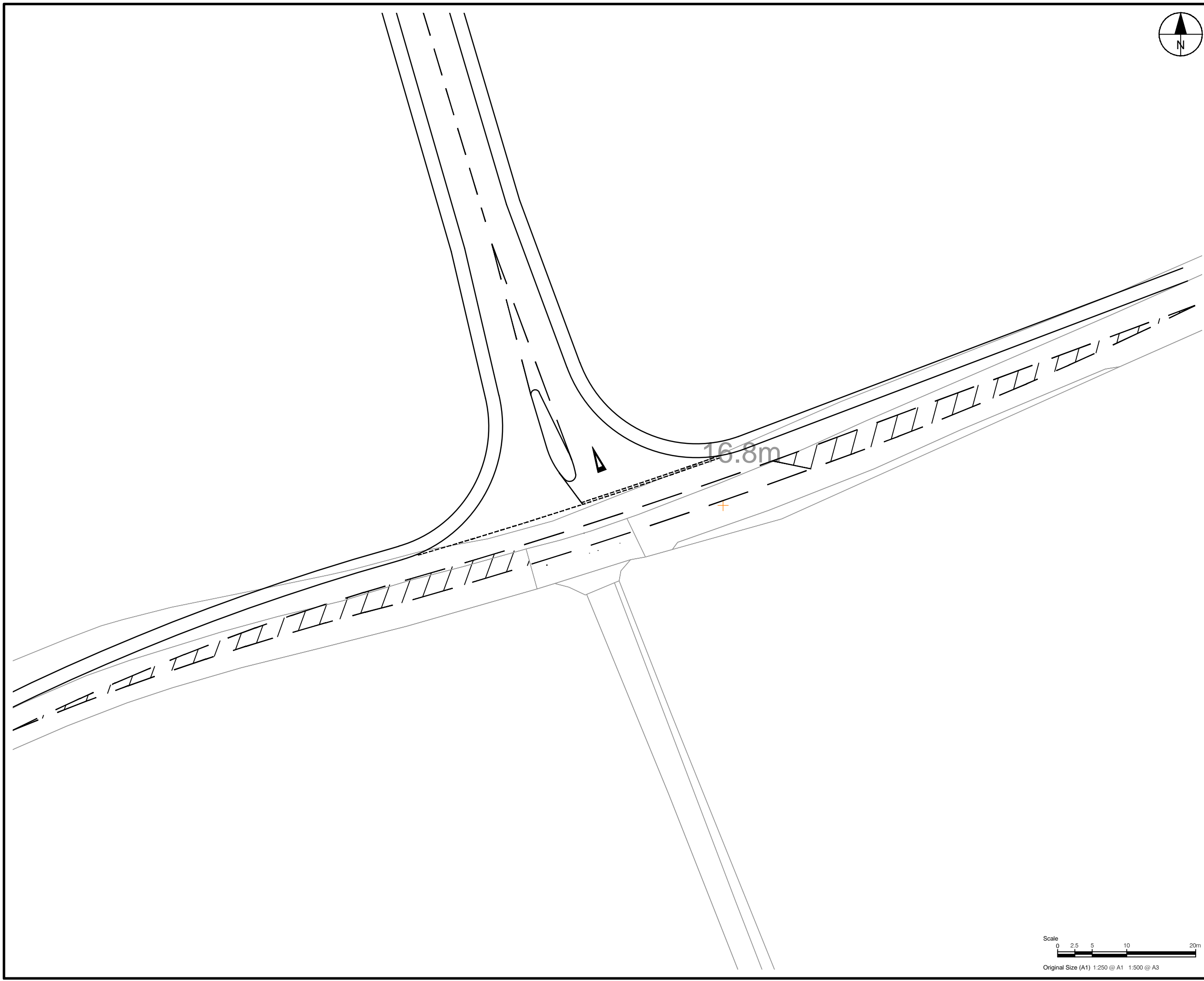
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Capabilities on project:  
Transportation

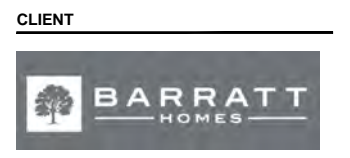
## Appendix B – 60485328/SKE/C/002

Filename: F:\PROJECTS\DEVELOPMENT - PRESTON MAINS FARM, EAST LINTON\03 EXECUTION\04 CAD\25 SKETCHES\60485328-SKE-C-0002.DWG  
 Last saved by: HASSELJ Last Plotted: 2016-08-26  
 Project Management Initials: Designer: MLF Checked: JH Approved: RH ISO A1 594mm x 841mm



# AECOM

**PROJECT**  
**PRESTON MAINS FARM, EAST LINTON**



**CONSULTANT**

AECOM  
 1 Tanfield  
 EDINBURGH, EH3 5DA  
 +44 (0) 131 301 8600 tel  
 +44 (0) 131 301 8699 fax  
 www.aecom.com

- NOTES**
1. ALL WORKS TO BE EXECUTED IN ACCORDANCE WITH THE SPECIFICATION FOR HIGHWAY WORKS - THE MANUAL OF CONTRACT DOCUMENTS FOR HIGHWAY WORKS, DESIGN MANUAL FOR ROADS AND BRIDGES, TRAFFIC SIGNS MANUAL AND LOCAL COUNCIL GUIDELINES.
  2. ALL DIMENSIONS ARE IN MILLIMETRES UNLESS STATED OTHERWISE. ALL LEVELS ARE IN METRES AND RELATE TO ORDNANCE DATUM.
  3. DO NOT SCALE FROM ANY DRAWING. WORK TO FIGURED DIMENSIONS ONLY. ANY DISCREPANCIES IN DIMENSION ARE TO BE REFERRED TO THE DESIGNER BEFORE WORK IS PUT TO HAND.
  4. ALL DIMENSIONS AND LEVELS ARE TO BE CHECKED ON SITE BY THE CONTRACTOR PRIOR TO PREPARING ANY WORKING DRAWINGS OR COMMENCING ON SITE.
  5. ALL WORKS BY THE CONTRACTOR MUST BE CARRIED OUT IN SUCH A WAY THAT ALL REQUIREMENTS UNDER THE HEALTH AND SAFETY AT WORK ACT ARE SATISFIED.
  6. ALL WORK IS TO BE CARRIED OUT IN COMPLIANCE WITH THE REQUIREMENTS OF THE STATUTORY AUTHORITIES AND CONSTRUCTION DESIGN AND MANAGEMENT REGULATIONS.
  7. DRAWING BASE RECEIVED FROM OTHERS. AECOM CANNOT GUARANTEE THEIR ACCURACY. CONTRACTOR TO SATISFY THEMSELVES AS TO THE ACCURACY OF SUCH INFORMATION.
  8. SERVICE INFORMATION IS INTERPOLATED FROM INFORMATION RECEIVED FROM THE UTILITY PROVIDERS, AND AS SUCH NO GUARANTEE OF THEIR ACCURACY CAN BE GIVEN. CONTRACTOR TO SATISFY THEMSELVES AS TO THE ACCURACY OF SUCH INFORMATION.

**ISSUE/REVISION**

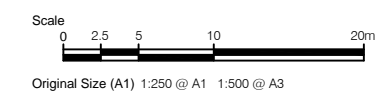
I/R	DATE	DESCRIPTION
<b>DRAFT</b>		

**KEY PLAN**

**PROJECT NUMBER**  
60485328

**SHEET TITLE**  
Preston Road / Prestonmains  
Indicative Ghost Island Priority  
Site Access Junction

**SHEET NUMBER**  
60485328 / SKE / C / 0002



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**From:**  
**To:** [Local Development Plan](#)  
**Subject:** Local Development Plan: Proposed Housing Development Sites in Gullane  
**Date:** 04 November 2016 13:10:10

---

Submission 0247

Dear Sir/Madam,

I object to the plans for four housing development sites in Gullane. I request that the following three sites be removed from the LDP as sites for housing development:

- (a) Fenton Gait East (NK8)
- (b) Fenton Gait South (NK9)
- (c) Saltcoats (NK7)

My reasons for objecting to these sites are as follows:

- 1) If the 4 sites remain on the plan, Gullane will contribute 50% of the new sites from the North Berwick coastal area.
- 2) The cumulative effect of the scale of this development on the village has not been properly assessed.
- 3) Poor access to employment and services makes these developments unsustainable.
- 4) Tourism and the quality of daily life in the village would be seriously affected for over 10 years which is an unacceptable length of time for residents and businesses to have to deal with disruption.
- 5) Public transport is poor. Parking at local stations, especially Drem, is barely adequate at present and would not cope with the large increase of commuters.
- 6) The distance from local facilities will mean that most people will use their cars for journeys within the village, resulting in road safety and parking issues.
- 7) The school and medical centre would be unable to cope with the large increase in numbers. The school already needs more rooms and the proposed addition of two classrooms would be inadequate.
- 8) The inclusion of two major Greenfield sites would compromise the delivery of the Brownfield site.

I have already submitted separate objections to the Greenfield sites.

Yours faithfully,  
Elizabeth Gillian Tennent

**From:** [Stuart Bendoris](#)  
**To:** [Local Development Plan](#)  
**Subject:** Objection to proposed Gullane Housing Sites  
**Date:** 04 November 2016 13:07:37

---

I wish to object strongly to the 4 proposed housing developments in Gullane.

These developments are simply not sustainable for a village the size of Gullane and would exacerbate poor access to employment and services. They would damage future opportunities for leisure and recreation in one of the region's most attractive locations and have serious negative impacts on the amenities of local people.

This would be over-development at a scale beyond that is far beyond reasonable, with three major sites concentrated in the east of the village with an unprecedented 30% growth in the village. It's simply madness!

The inclusion of all four sites in the LDP is grossly unbalanced and overestimates the capacity of Gullane to absorb it. If all these 4 sites remain Gullane will contribute 50% of all the new sites from the North Berwick Coastal area.

The cumulative impact on Gullane has not been properly assessed, nor has the impact on the rural road network, and in particular for the C111 towards West Fenton (where I live and where this road is used by many vulnerable users going to Muirfield Riding Therapy). A fatality/fatalities is not out of the question if traffic on this road is increased as will inevitably be the case should these developments go ahead.

The access to public transport (trains in particular) falls well below what would be needed. The train stations at Drem and Longniddy are already insufficient for parking and have frequently overcrowded trains.

All the facilities of Gullane are at the complete opposite end of the village to the proposed developments so that even simple errands will demand a car journey. The cumulative effect on the Gullane Conservation Area would ruin its amenity and create road safety issues arising from awkward parking.

The inclusion of the two major Greenfield sites would compromise and delay the delivery of the Brownfield site at the old Fire Training College. Community facilities, in particular the Village Hall, cannot meet increased level of demand. The scale of change and a duration of development of more than 10 years will prove extremely difficult to mitigate thus impacting tourism and day to day life in the village to an absolutely unreasonable level.

The impact on school and medical facilities will be major. Recent housing developments in Gullane have resulted in an average of 1 school pupil per new house. The proposal from East Lothian Council for only two additional classrooms were all the sites to proceed is totally inadequate.

These proposals surely cannot be approved given the obvious detrimental issues they would cause, please do the right thing and stop them.

**From:**  
**To:** [Local Development Plan](#)  
**Subject:** Local Development Plan (LDP) - Objection  
**Date:** 04 November 2016 13:48:05

---

Dear Sir/Madam

I write to object to certain areas contained within the council's proposed LDP for new and additional housing - namely;

# Saltcoats (NK7)

# Fenton Gait East (NK8)

# Fenton Gait South (NK9)

The inclusion of these three sites and their subsequent development represents a scale of growth that the village of Gullane cannot cope with. The impact of the number of new houses has not been adequately assessed, and in particular the effect on the local primary school, health centre and other local services. In particular the effect on increased road traffic and the current lack of access to local rail stations.

Should these developments proceed, they will have a detrimental impact on the rural nature of the area, significantly increase the flow of traffic on what are effectively country lanes and remove valued recreational space from the current community.

Yours sincerely

Peter Rae

**From:** [Abigail Hoppe](#)  
**To:** [Local Development Plan](#)  
**Subject:** Objection to developing the greenfield sites in Gullane  
**Date:** 04 November 2016 13:48:54

---

Hi there

I am objecting to the building of several new houses in Gullane.

I live on the main road of Gullane and am very concerned about the increase in traffic the building vehicles and new owners would bring to an already busy road. I am concerned for safety reasons and noise reasons.

I also think these several new houses would totally transform the feel of the village primary school with a massive increase in pupils. A real shame to change the experience of a village school to such an extent.

Kind Regards

Abi



## CRS Contractors Ltd – Representations to Proposed Plan Representation about Fenton Barns becoming a settlement

### About You

What is your name?	Stuart Salter
What is your email address?	<a href="mailto:stuart@geddesconsulting.com">stuart@geddesconsulting.com</a>
Postal Address:	The Quadrant 17 Bernard Street Edinburgh
Please enter your postcode:	EH6 6PW
Are you responding as (or on behalf of) a...?	Developer/agent/landowner
What is your organisation and role (if applicable)?	Organisation: Geddes Consulting Role: Director
Are you supporting the plan? If Yes: Please include your reasons for support	No

### 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:*

A new Inset Plan is required for Fenton Barns which proposed to be designated as a settlement.

The area to be designated as a settlement is shown on the plan (14024-PL-P004 Representation about Fenton Barns becoming a settlement).

#### Designating Fenton Barns as a settlement

The existing area of Fenton Barns extends to over 50ha and is a considerable developed area. Fenton Barns is already a substantial area of existing built development.

In terms of its built area, it is much larger than many of the rural settlements already designated in the Local Plan. In comparison, existing settlements such as Kingston (2ha) or Humbie (3.2ha) are already designated in the adopted Local Plan.

Designation as a settlement would initially allow appropriate infill development associated with a village use, complementing and supporting existing businesses. Without a settlement designation, all existing economic development in this location will continue to be treated as *development in the countryside* and contrary to the approved development plan.

Designation as a settlement would benefit the broad range of existing businesses at Fenton Barns including local craft shops, local shop, nursery and other smaller businesses as well as the larger employers such as

Monaghan Mushrooms and Brown Brothers.

CRS Contractors control nearly 2 ha of land at Fenton Barns (as shown in Plan *14024-PL-P004 Representation about Fenton Barns becoming a settlement*) and preliminary enquiries on its behalf with the Council has highlighted difficulties in securing consent, even for a single house. Disused land within the context of a designated settlement would be regarded as infill development. This would be supported by the Council's planning policy and highlights why designation as a settlement would help facilitate further development.

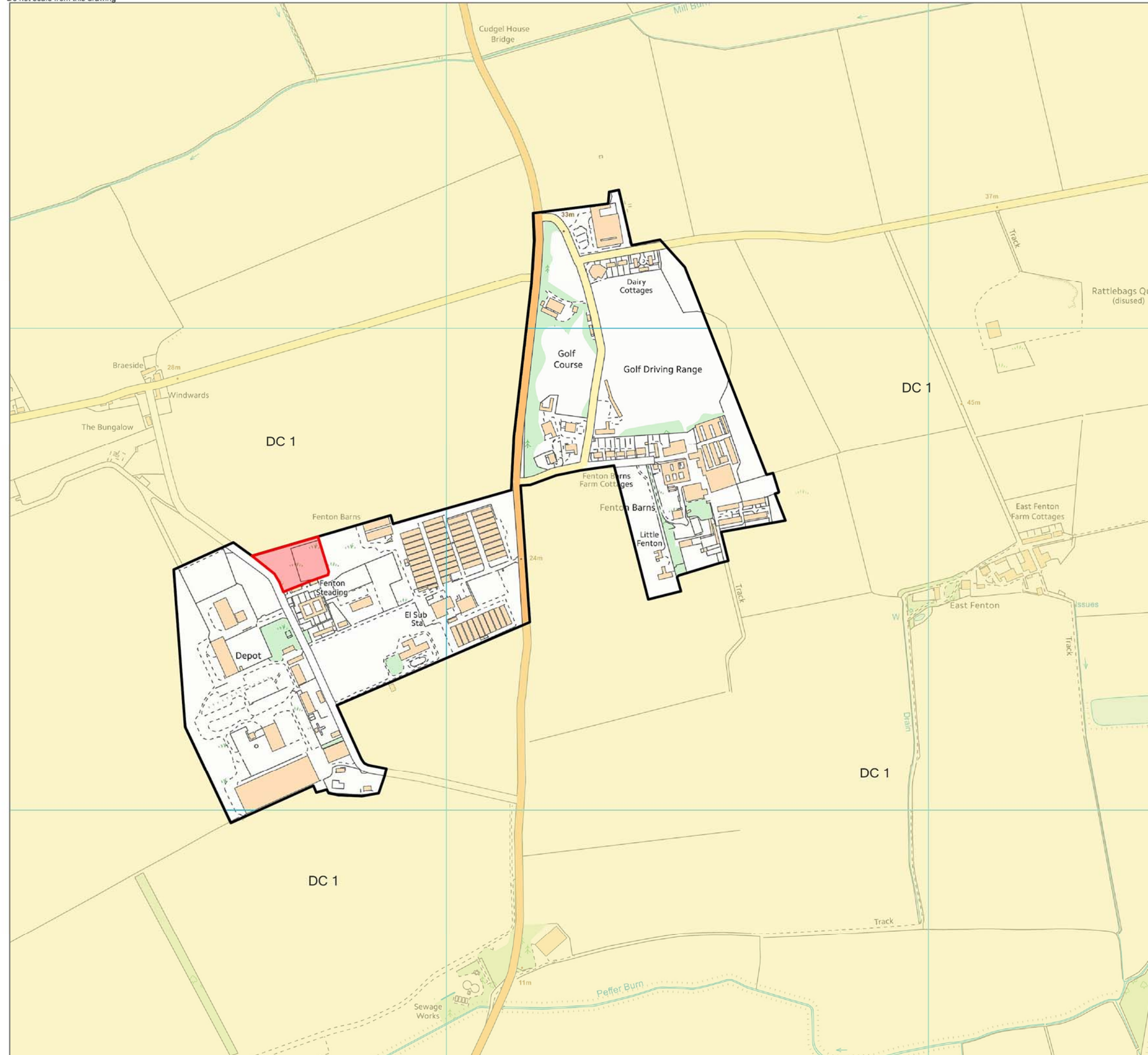
Plan *14024-PL-P004 Representation about Fenton Barns becoming a settlement* (submitted with this representation) shows the settlement area to designate as well as the settlement boundary.

*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):*

The modifications to the LDP Proposal Map are justified for the reasons explained above.

Do not scale from this drawing



Filepath: General / Projects / 09012 - Wallace land / Sites/ East Lothian / Fenton Barns / Plans & Drawings / Finished Drawings  
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# Fenton Barns

## CRS Contractors Ltd

Drawing No. 14024-PL-P004  
Representation about Fenton Barns  
becoming a settlement

- Extent of land controlled by CRS Contractors Ltd
- Policy DC1
- Proposed Settlement Boundary

Rev - (02.11.16) Drawn: SD - Checked: BS

Status: For Information

Not to scale @ A3



**geddes**consulting

The Quadrant, 17 Bernard St., Edinburgh, EH6 6PW | Tel: 0131 5533639 | info@geddesconsulting.com

Our ref: PCS/149022  
Your ref: Proposed Local  
Development Plan

Iain McFarlane  
East Lothian Council  
Planning & Building Standards  
John Muir House  
Court Street  
Haddington  
EH41 3HA

If telephoning ask for:  
Paul Lewis

04 November 2016

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

Dear Mr McFarlane

## **Town and Country Planning (Scotland) Acts East Lothian Local Development Plan: Publication of Proposed Plan.**

Thank you for your consultation which SEPA received on 16 September 2016. We welcome the opportunity to comment on the Proposed Plan (PP) for East Lothian's Local Development Plan (LDP).

First, we would like to express our support for the way East Lothian Council has co-ordinated the development of its Local Development Plan (LDP) with its Strategic Environmental Assessment (SEA) and Supplementary Planning Guidance (SPG) and delivery or supporting documents such as its Action Programme (AP), Strategic Flood Risk Assessment (SFRA) and Monitoring Statement. The degree to which the Proposed Plan (PP) is both informed by these other processes and informs them (or is 'ground-truthed' as with the AP) is very helpful. For the next iteration of the LDP it would be useful to focus on the most important areas for work as it is possible that too much has been attempted, as there are points at which the documents do not align or information from one process has not been carried forward into another process

The subject of this consultation and the document which will guide development in East Lothian is the PP and our comments, below, focus on the PP. Especially because of the parallel development of the PP with the SEA, etc. our comments on the PP will make reference to the Environmental Report (ER) of the SEA, the SFRA and other documents. We will also provide comments on the SFRA, SG and AP separately.

There is one **objection** to the PP that we want to highlight.

There are a large number of sites described as "Established Housing and Employment Sites" listed in tables for Musselburgh, Prestonpans, Tranent, Haddington, Dunbar and North Berwick. Although these sites are not shown on the spatial strategy drawings within the PP, the majority are shown on the proposal maps which accompany the plan. These allocations have not been through the SEA process with the same rigour as other sites and the majority have not been assessed by

the SFRA and the requirement for Flood Risk Assessments (FRA) to be submitted with planning applications, where appropriate, has not been identified. As no due consideration of flood risk has been provided on these sites, particularly taking into account significant changes in legislation, policy and the physical environment (such as the higher annual rainfall being experienced in East Lothian) it is not possible to establish the principle of development at these sites.

We will only be able to review this objection if these sites are open to the same process of review as all new sites which are being considered for East Lothian's LDP.

To summarise: in this letter we are responding to the following, in four appendices.

Appendix 1. The Proposed Local Development Plan 2016 (PP)

Appendix 2. Draft Development Briefs (2016) Supplementary Planning Guidance (SPG), Draft Strategic Flood Risk Assessment (2016) (SFRA), Draft Action Programme. (AP)

Appendix 3. A list of Potentially Vulnerable Areas (PVA) in East Lothian

We would also like to provide some comments on the following documents.

### **Comments on Monitoring Statement and Technical Notes 5, 6, 7 & 12.**

#### **1. Monitoring Statement**

- 1.1 The Monitoring Statement provides a concise summary of environmental characteristics of East Lothian, which are central to SEPA's remit: soil; minerals; water; flooding; air quality; vacant and derelict land; climatic factors.
- 1.2 Paragraph 88: the "Local Plan aims to avoid increasing unmanageable flood risk, either to a proposed development or caused by it". We support the recognition that the aim of the Local Development Plan is to ensure there is no increase in flood risk either to new development or as a result of new development. We consider the word "unmanageable" should be removed as it implies that some forms of flood risk can be managed. Any potential increase in flood risk should be avoided.
- 1.3 In recent years, East Lothian has experienced markedly higher annual rain fall. This should be taken into account when considering flood risk.

- 1.4 The 'Physical Characteristics' which relate to the environmental characteristics of East Lothian, of interest to SEPA, are: transport and accessibility; commuting patterns; waste; and energy. Again, we consider that this section provides a good and concise summary.
- 1.5 We support the preference (paragraph 121) for Scottish Water Assets to be used for water supply and waste water treatment. We also support the recommendation in paragraph 124 that where there is no public sewer network a private wastewater treatment system may be required and discussion with SEPA to discuss specific requirements is essential. We would like to make three notes of caution.
- The Monitoring Statement identifies capacity at all of the Waste Water Treatment Plants. It is not clear if there is capacity for all development proposed in the catchments for these plants.
  - We urge applicants to discuss requirements for private wastewater systems with us at the earliest opportunity. It needs to be recognised, however, that private wastewater systems may not always be acceptable, e.g. if there cannot be an appropriate separation between the system and a private water supply for homes or businesses which are not connected to the Scottish Water network for drinking water.
  - **We are very concerned by the potential for significant impacts on the water environment, surface and ground water, caused by a proliferation of private sewage systems. In order for the amount of development envisaged in this PP to be delivered it is imperative that adequate provision is made for connection to Scottish Water Assets. This must be a priority for the Action Programme.**

## 2. Technical Note 5. Planning for Waste

- 2.1 We support the background this technical note provides for the consideration of waste. We believe, however, that the connection between waste, energy and climate change could have been explored further and that this would have provided useful support for direction given in the PP. Consideration of waste heat and how this can be utilised by homes and businesses as an alternative to other sources of energy and the subsequent reduced impact on climate change would have been welcome and should be considered for future iterations of the LDP.



### **3. Technical Note 6 Planning for Minerals**

- 3.1 This technical note includes consideration of shale oil and gas, including coal bed methane. It is very useful that a framework for the consideration of any future applications in East Lothian is being developed. We would like to repeat our offer of providing any assistance we can in developing this framework further as well as any policy or guidance.

### **4. Technical Note 7 Planning for the Coast**

- 4.1 We support the consideration given to coastal flooding (with and without the factor of climate change) in this technical background to planning for the coast and in coastal areas.

### **5. Technical Note 12 Planning for Air Quality**

- 5.1 We welcome the inclusion of this technical note on planning for air quality. An issue which is not addressed, however, is that while an individual development may not have an impact on air quality (and may have an apparently insignificant contribution to greenhouse gases), it may have a significant impact in combination with other developments. These impacts may not be experienced locally, but they may be experienced at focal points along the transport or commuter networks where traffic concentrates.

Once again, we would like to support the approach East Lothian Council has taken to developing its Local Development Plan in parallel with the consideration given to the environmental impacts of different options and sites for development.

If you have any queries relating to this letter, please contact me by telephone on 0131 273 7334 or e-mail at [planning.se@sepa.org.uk](mailto:planning.se@sepa.org.uk).

Yours sincerely

Paul Lewis  
Senior Planning Officer  
Planning Service

ECopy to:

Ruth Cameron, Historic Environment Scotland – [ruth.cameron@hes.scot](mailto:ruth.cameron@hes.scot)

Viv Gray, Scottish Natural Heritage – [Viv.Gray@snh.gov.uk](mailto:Viv.Gray@snh.gov.uk)

#### *Disclaimer*

*This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response,*

*it should not be assumed that there is no impact associated with that issue. For planning applications, if you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found on our [website planning pages](#).*

## Appendix 1. The Proposed Plan (PP)

Our response to the PP addresses five areas in SEPA's remit.

1 Flood Risk

2 The Water Environment

3 Air Quality, Greenhouse Gases and Climate Change

4 Waste

5 Shale Oil and Gas

As we understand that changes will not be made to the PP before it is sent to Examination in Public, our response is set out as a series of representations of support or objection to aspects of the PP.

Representations of support are made where there are aspects of the PP which we consider should be carried forward into the approved Local Development Plan. Representations of objection are made where we consider changes are necessary and need to be taken forward in the approved Local Development Plan.

Our representations are split into three categories: representations on proposals; representations on policies; representations on sites.

### Table of Representations

#### Proposals

Established Housing and Employment Sites" listed in tables for Musselburgh, Prestonpans, Tranent, Haddington, Dunbar and North Berwick.

Plan Section	Objection	Representation	Justification
Page 22 Table MH1: Musselburgh Cluster Established Housing & Employment Sites Summary	Objection	We object to the inclusion of these sites in the LDP, without them being subject to the same process and review as all other sites to be included in the LDP.	Although these sites are not shown on the spatial strategy drawings within the PP, the majority are shown on the proposal maps which accompany the plan. We have not had an opportunity to comment on these sites previously, during the preparation of this LDP, i.e. we have not been provided with shapefiles which allow us to assess the sites against all relevant information we hold on record. It is not clear if these allocations have been through the

			<p>SEA process with the same rigour as other sites and the majority have not been assessed by the SFRA and the requirement for Flood Risk Assessments (FRA) to be submitted with planning applications, where appropriate, has not been identified in the PP. As less consideration of flood risk has been given to these sites, particularly taking into account significant changes in legislation, policy and the physical environment (such as the higher annual rainfall being experienced in East Lothian) it is not possible to establish the principle of development at these sites.</p>
<p>Page 26 Table PS1:Prestonpans Cluster Established Housing &amp; Employment Sites Summary</p>	<p>Objection</p>	<p>We object to the inclusion of these sites in the LDP, without them being subject to the same process and review as all other sites to be included in the LDP.</p>	<p>Although these sites are not shown on the spatial strategy drawings within the PP, the majority are shown on the proposal maps which accompany the plan. We have not had an opportunity to comment on these sites previously, during the preparation of this LDP, i.e. we have not been provided with shapefiles which allow us to assess the sites against all relevant information we hold on record. It is not clear if these allocations have been through the SEA process with the same rigour as other sites and the majority have not been assessed by the SFRA and the requirement for Flood Risk Assessments (FRA) to be submitted with planning applications, where appropriate, has not been identified in the PP. As less consideration of flood risk has been given to these sites, particularly taking into account significant changes in legislation, policy and the physical environment (such as the higher annual rainfall being experienced in East Lothian) it is not possible to establish the principle of development at these sites.</p>
<p>Page 36</p>	<p>Objection</p>	<p>We object to the inclusion of these</p>	<p>Although these sites are not</p>

<p>Table TT1: Tranent Established Housing &amp; Employment Sites Summary</p>		<p>sites in the LDP, without them being subject to the same process and review as all other sites to be included in the LDP.</p>	<p>shown on the spatial strategy drawings within the PP, the majority are shown on the proposal maps which accompany the plan. We have not had an opportunity to comment on these sites previously, during the preparation of this LDP, i.e. we have not been provided with shapefiles which allow us to assess the sites against all relevant information we hold on record. It is not clear if these allocations have been through the SEA process with the same rigour as other sites and the majority have not been assessed by the SFRA and the requirement for Flood Risk Assessments (FRA) to be submitted with planning applications, where appropriate, has not been identified in the PP. As less consideration of flood risk has been given to these sites, particularly taking into account significant changes in legislation, policy and the physical environment (such as the higher annual rainfall being experienced in East Lothian) it is not possible to establish the principle of development at these sites.</p>
<p>Page 43 Table HN1: Haddington Established Housing &amp; Employment Sites Summary</p>	<p>Objection</p>	<p>We object to the inclusion of these sites in the LDP, without them being subject to the same process and review as all other sites to be included in the LDP.</p>	<p>Although these sites are not shown on the spatial strategy drawings within the PP, the majority are shown on the proposal maps which accompany the plan. We have not had an opportunity to comment on these sites previously, during the preparation of this LDP, i.e. we have not been provided with shapefiles which allow us to assess the sites against all relevant information we hold on record. It is not clear if these allocations have been through the SEA process with the same rigour as other sites and the majority have not been assessed by the SFRA and the requirement for Flood Risk Assessments (FRA) to be submitted with planning applications, where appropriate, has not been identified in the PP. As less consideration of flood risk has been given to these sites,</p>

			particularly taking into account significant changes in legislation, policy and the physical environment (such as the higher annual rainfall being experienced in East Lothian) it is not possible to establish the principle of development at these sites.
Page 49 Table DR1: Dunbar Established Housing & Employment Sites Summary	Objection	We object to the inclusion of these sites in the LDP, without them being subject to the same process and review as all other sites to be included in the LDP.	Although these sites are not shown on the spatial strategy drawings within the PP, the majority are shown on the proposal maps which accompany the plan. We have not had an opportunity to comment on these sites previously, during the preparation of this LDP, i.e. we have not been provided with shapefiles which allow us to assess the sites against all relevant information we hold on record. It is not clear if these allocations have been through the SEA process with the same rigour as other sites and the majority have not been assessed by the SFRA and the requirement for Flood Risk Assessments (FRA) to be submitted with planning applications, where appropriate, has not been identified in the PP. As less consideration of flood risk has been given to these sites, particularly taking into account significant changes in legislation, policy and the physical environment (such as the higher annual rainfall being experienced in East Lothian) it is not possible to establish the principle of development at these sites.
Page 56 Policy NK1: North Berwick Established Housing & Employment Sites Summary	Objection	We object to the inclusion of these sites in the LDP, without them being subject to the same process and review as all other sites to be included in the LDP.	Although these sites are not shown on the spatial strategy drawings within the PP, the majority are shown on the proposal maps which accompany the plan. We have not had an opportunity to comment on these sites previously, during the preparation of this LDP, i.e. we have not been provided with shapefiles which allow us to assess the sites against all relevant information we hold on record. It is not clear if these allocations have been through the



			<p>SEA process with the same rigour as other sites and the majority have not been assessed by the SFRA and the requirement for Flood Risk Assessments (FRA) to be submitted with planning applications, where appropriate, has not been identified in the PP. As less consideration of flood risk has been given to these sites, particularly taking into account significant changes in legislation, policy and the physical environment (such as the higher annual rainfall being experienced in East Lothian) it is not possible to establish the principle of development at these sites.</p>
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### Policies

Plan Section	Objection/ Support	Representation	Justification
(Page 86) PROP OS5: Potential Cemetery Extensions	Objection	<p>The proposal should be modified to include the following.</p> <p>“Applications for development should be supported by a site specific investigation to be undertaken in line with SEPA ‘Guidance on Assessing the Impacts of Cemeteries on Groundwater’. This investigation should demonstrate there will be no detrimental impacts to groundwater. It should be recognised that a site specific investigation may demonstrate that the site is unsuitable for use as a cemetery.</p>	<p>Cemeteries can have a detrimental impact on groundwater. The acceptability of the proposed site locations and scale of development can only be assessed following site specific investigation. In the absence of such information, the acceptability of these sites cannot be established. Should investigations be carried out prior to adoption, in accordance with SEPA ‘Guidance on Assessing the Impacts of Cemeteries on Groundwater’, then we would be able to review our position.</p> <p>If no further information is provided prior to adoption, a development requirement should be attached to each site requiring site specific investigation to be undertaken in line with SEPA ‘Guidance on Assessing the Impacts of Cemeteries on Groundwater’, before any development occurs at the site. In addition a caveat should be attached to make it clear that dependent on the findings of the site specific investigation the site may be found to be unsuitable for the creation of a cemetery.</p>
Page 102	Objection	We consider that this policy should	We support the inclusion and principle of

<p>Policy SEH1: Sustainable Energy and Heat</p>		<p>be changed to the following.</p> <p>“The Council supports the principles of the “energy hierarchy” and promotes energy-efficient design in new development. The Council encourages the development of Community or district heating schemes for all new major developments and applicants are encouraged to submit an Energy Statement evaluating the feasibility of delivering district heating, connecting to any existing schemes and the potential to extend such a system to adjacent uses/sites. The energy statement should also outline how the scheme would not harm amenity and co-exists satisfactorily with existing and/or proposed uses in the area.</p> <p>Where a district heat network exists or is planned, new developments should include appropriate infrastructure to allow connection to the network or safeguards to allow future connection.</p> <p>The Council has identified Millerhill/Craighall, Oxwellmains and Cockenzie as three locations where district heat networks can be established, subject to the Energy Statement and justification outlining they would not harm amenity and could co-exist satisfactorily with existing or proposed uses in the area. Proposals in areas identified as appropriate for district heating must not prejudice the potential for heat networks to be developed.”</p>	<p>this policy. We consider, however, that the wording of the policy does not provide a fully positive or supportive requirement for new development to plan for district heating that is consistent with the guidance contained within Scottish Planning Policy.</p> <p>We note paragraph 4.68: <i>“The Council will support the principle of proposals for district heating networks based on low carbon or renewable sources, or that facilitate the more efficient use of waste heat from existing or committed heat generators...”</i> This message is not explicitly clear in policy SEH1 and the text omits reference to locations for proposals for district heating networks apart from those named in policy SEH1. We consider that this omission weakens the opportunity for East Lothian Council to require district heating as part of large scale new developments not identified by name in SEH1 (Millerhill/Craighall, Oxwellmains and Cockenzie).</p> <p>Policy SEH1 states <i>“Community heating schemes are encouraged where they would not harm amenity and could co-exist satisfactorily with existing or proposed uses in the area. Applicants are encouraged to submit an Energy Statement indicating how such matters have been addressed.”</i> We consider that this approach is not fully consistent with, and does not fulfil, the approach contained in paragraph 190 of the MIR: <i>“Local Development Plans are to support the development of heat networks wherever possible and the LDP will contain such a policy.”</i> In our response to the Main Issues Report, we strongly supported this Preferred Option which also included the promotion of <i>“district heating and combined heat and power facilities in large scale development sites as well as the use of heat from renewable sources and waste heat;”</i> a position which we consider has not been</p>
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			<p>adequately promoted or clarified in policy SEH1.</p> <p>We consider policy SEH1 as written is not consistent with paragraph 159 of Scottish Planning Policy which advocates that Local Development Plans support the development of heat networks in as many locations as possible. In order to deliver the Scottish Government's ambitions for 1.5tw of heat demand delivered by district or communal heating and for 40,000 homes to be heated through heat networks by 2020, new developments need to be designed to incorporate district heating. Where substantial new developments are planned, the opportunity arises for providing a heat network within the site and for this to be required and designed in at the earliest stages. New developments also have a role to play in not only establishing and creating these networks, but also in connecting to networks to make use of heat that is being captured.</p>
Page 111 Policy W1: Waste Management Safeguards	Support	We support this policy as set out in the Proposed Plan.	This policy which protects existing, named waste management facilities from development which would compromise the operation of the sites is in line with Scottish Planning Policy, paragraphs 184 to 187.
Page 111 Policy W2: Waste Management Developments	Support	We support this policy as set out in the Proposed Plan.	We support this policy as we consider it is in line with Scottish Planning Policy, paragraph 186.
Page 112 Policy W3: Waste Separation and Collection	Support	We support this policy as set out in the Proposed Plan.	We support the positive approach in Policy Waste 3 as it includes the provision of waste separation to meet the requirements of the Waste (Scotland) Regulations.
Page 112 Policy W4: Construction Waste	Support	We support this policy as set out in the Proposed Plan.	We support this policy and its supportive approach to minimising waste during construction, which we consider is in line with Scottish Planning Policy, paragraph 179, and paragraph 48 of Scottish Government's Planning and Waste

			Planning Advice Note.
Page 116 Policy Min8: Mineral Extraction Criteria	Objection	We object to the inclusion of Criterion 5 “Where there is a material risk of disturbance or environmental damage, this is outweighed by demonstrable and significant local or community benefits related to the proposal.”	Criterion 5 provides an exemption for “material risk of disturbance or environmental damage” which cannot be accepted. The Local Development Plan should provide a framework for avoiding environmental damage. The potential for damage to the environment from mineral extraction, including the abstraction of “onshore oil or gas or coalbed methane” is considerable and the damage could be significant rather than material. We consider that this criterion provides an explicit exemption for development which could cause significant damage, and it should be excluded from the Local Development Plan.
Page 128 Policy NH7: Protecting Soils	Support	We support this policy (and its supporting text) as set out in the Proposed Plan.	As set out in the text and policy addressing soils, the PP identifies the multi-functional (“ecosystems services”) of soils, from food production to storing carbon which could otherwise be released as CO2. The particular attention to sensitive soil types (agricultural land and carbon rich soils) is particularly welcome. We particularly welcome the policy that applicants must demonstrate the effect development would have on CO2 emissions as a result of both construction and, where relevant, operation.
Page 129 Advice Box 6: Water Environment	Support	With the qualification that we think the principles in Advice Box 6 should have been included as policy in Policy NH9, we support this advice (and its supporting text) as set out in the Proposed Plan.	The operating background for the water environment is set out in legislation and guidance including The Water Framework Directive (2000/60/EC) (WFD), Water Environment and Water Services (Scotland) Act 2003 (WEWS)) and the Town and Country Planning (Development Planning) (Scotland) Regulations 2008. We consider that the principles set out in Advice Box 6 summarise the principles established for the water environment.  Planning authorities are legally responsible authorities in respect of securing compliance with the WFD and “in preparing a local development plan, the planning authority is to have regard to any river basin management plan relating to the local development plan area
Page 129 Policy NH9: Water Environment	Support	With the qualification that we think the principles in Advice Box 6 should have been included as policy in Policy NH9, we support	

		<p>this Policy (and its supporting text) as set out in the Proposed Plan.</p>	
<p>Page 130 Paragraph 6.29</p>	<p>Objection</p>	<p>Further clarity is required within this section and we consider the following section should be reworded</p> <p>from:</p> <p><i>“A developed site must maintain its greenfield surface water conveyance and surface water storage capacity (or improved storage capacity) over a range of rainfall events including the 1 in 30 year event and the 1 in 200 year event. This manages flood risk to the site itself, and avoids increasing flood risk to adjacent and downstream sites. If surface water storage capacity is increased compared to greenfield values then this can help reduce flood risk in adjacent areas, which may be very important in flood prone areas. Regard should be had to SEPA surface water flood maps and flow paths and landscaping should be designed accordingly to ensure there is no increase in flood risk to others.”</i></p> <p>To:</p> <p>“A development site must control and release runoff rates at greenfield rates over a range of rainfall events including the 1 in 30 year event and the 1 in 200 year event in agreement with East Lothian Council as flood prevention authority. This helps manage flood risk within the development site and also ensures there are no increase in flood risk to adjacent and downstream sites. SEPA surface water flood map shows areas that may be subjected to ponding from either pluvial or sewer flooding and can be used to indicate areas where further assessments are required, such as a flood risk assessment. This map does not show flow path direction. Pre development flow paths through the site should be maintained after the completion of the development.”</p>	<p>We consider that this amendment is more consistent with the aims of both the Flood Risk Management (Scotland) Act 2009 and Scottish Planning Policy.</p>

		In addition, we recommend this section refers to the need for an allowance for climate change in relation to designing SUDS and controlling runoff rates.	
Page 130 Policy NH10: Sustainable Urban Drainage Systems	Support	We are fully supportive of the requirement for appropriate long term maintenance arrangements for Sustainable Urban Drainage Systems (SUDS).	If SUDS are to be used to prevent increased flood risk as well as for their primary purposes, to protect the water environment, it is imperative that a mechanism is in place to ensure that they are fit for these purposes for the long-term.
Page 131 Paragraph 6.32.	Objection	To the statement <i>“Where built development is permitted on areas of flood risk, measures to protect against .... neutral or better outcome ”</i> should be added the following: “The avoidance principle should be applied whenever possible in compliance with SPP.”	While landraising and compensatory storage may reduce the likelihood of flooding of the site being developed, it could lead to increased risk of flooding elsewhere, e.g. to neighbouring existing or proposed development.
Page 131 Policy HH11: Flood Risk	Objection	Policy NH11: Flood Risk (g). An allowance for climate change should be specified, as well as a guide to “an appropriate allowance for “freeboard”.	The policy needs to be stronger and needs to establish provision for climate change with linkages to The Climate Change (Scotland) Act 2009 as well as SPP. This policy implies that a flood risk assessment (FRA) is required for proposals within the medium to high risk category of flood risk in SPP. The medium to high risk category in SPP solely mentions fluvial or coastal flooding. A FRA is required to assess the risk of flooding from all sources to ensure that the development is free from flood risk and complies with SPP.

## Sites

MH4 Musselburgh Old Craighall Junction North	Support	We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.  <b>A FRA for this site should consider culverts within the site.</b>	A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation
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			<p>including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>MH3 Musselburgh Southwest Old Craighall</p>	<p>Support</p>	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>A FRA for this site should consider culverts adjacent to the site.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul>



			<p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>MH1 Musselburgh Craighall</p>	<p>Support</p>	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>A FRA for this site should consider culverts adjacent to the site.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be</p>

			<p>used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>MH7 Musselburgh Pinkie Mains (MH6 Pinkie Mains is considered established supply.</p>	<p>Support</p>	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p>

			<p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>MH9 Musselburgh Wallyford</p>	<p>Support</p>	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be</p>

			reviewed.
MH8 Musselburgh Levenhall	Support	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>During high flows, there are recorded instances of the Ravenshaugh Burn flooding adjacent to Beggards Bush House where the burn joins with an unnamed tributary and was culverted into small pipes. The culverts have been replaced with a large open channel. The FRA should take these factors into account.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
MH5 Musselburgh Edenhall	Support	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>A tributary from of the Pinkie Burn is believed to flow through the site</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering</p>

		<p>as shown on the SEPA fluvial flood map. A FRA was carried out in April 2010 and identified that a 600mm diameter culvert emerges at Pinkie St Peter's Primary School. The exact location of the culvert upstream is unknown.</p> <p>A FRA should determine whether the tributary is culverted beneath the former hospital. No new development should take place above the culvert.</p>	<p>sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>MH10 Musselburgh Dolphingstone</p>	<p>Support</p>	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>There is a small watercourse along boundary of the site which may pose a small risk of flooding. This should be addressed in the FRA.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland)</li> </ul>

			<p>Act 2003,</p> <ul style="list-style-type: none"> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>MH2 Musselburgh Old Craighall East</p>	<p>Support</p>	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has</p>

			<p>been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>MH14 Musselburgh Whitecraig South</p>	<p>Support</p>	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>It is possible that a culverted watercourse flows along the northern boundary adjacent to the School and the FRA should assess the risk from this watercourse, if it is present.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk</p>



			<p>on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>MH12 Musselburgh Barbachlaw</p>	<p>Support</p>	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>A small watercourse could be culverted along the northern boundary of the site and the FRA should address this possibility.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA</p>

			is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.
MH15 Musselburgh Whitecraig North	Support	We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
MH13 Musselburgh Howe Mire	Support	We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.	A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable

			<p>flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>EGT1 Prestonpans / Port Seton / Cockenzie / Longniddry Cluster</p> <p>Cockenzie Power Station</p>	<p>Support</p>	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>The predicted 200 year still water level is 3.96mAOD. A FRA was undertaken for residential development off Avenue Road which was at risk of surface water flooding.</b></p> <p><b>The level of detailed required in</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation</p>

		<p><b>the FRA will depend on the location of any proposed development</b></p>	<p>including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>PS1 Prestonpans / Port Seton / Cockenzie / Longniddry Cluster Longniddry South</p>	<p>Support</p>	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>There are flooding issues on the Seton and Seton Dean Burns, but we do not think these are relevant to this site. The FRA should assess the risk from small watercourse and take account of any changes in hydrology as a result of the mine workings.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul>

			<p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>PS2 Prestonpans / Port Seton / Cockenzie / Longniddry Cluster</p> <p>Land at Dolphinstone North</p>	<p>Objection</p>	<p>We consider that a Flood Risk Assessment (FRA) to accompany planning applications at this site should be included as requirement for development of this site.</p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of</p>

			<p>development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>TT8 Tranent Cluster</p> <p>East Macmerry Industrial Estate</p>	Support	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>A FRA has been required and we Assume this is to assess the risk of surface water flooding.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for</p>

			additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.
TT3 Tranent Cluster  Southwest Windygoul	Support	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>A FRA has been required and we assume this is to assess the risk of surface water flooding. The risk shown on the SEPA maps is just at very small pockets and this source of flood risk may not be a significant issue.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
TT1 Tranent	Support	We support the inclusion of a requirement for a Flood Risk	A principal aim of development plans is the promotion of safe and



<p>Cluster</p> <p>Windygoul South</p>		<p>Assessment (FRA) to accompany planning applications at this site.</p> <p><b>A FRA has been required and we assume this is to assess the risk of surface water flooding.</b></p>	<p>resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>TT4 Tranent Cluster</p> <p>Lammermoor Terrace</p>	<p>Support</p>	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>A small watercourse could be culverted along the eastern boundary of the site. The location and flood risk should be assessed and no development should develop above the culvert.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation</p>

			<p>including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>TT5 Tranent Cluster</p> <p>Bankpark Grove</p>	Support	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>There is a small watercourse along the eastern boundary of the site which may pose a risk of flooding to the development site and it should be assessed, particularly as it is culverted beneath Dovecot Brae/Brickworks Road.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul>

			<p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>TT7 Tranent Cluster</p> <p>Macmerry North</p>	<p>Support</p>	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>A FRA has been required and we assume this is to assess the risk of surface water flooding.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of</p>

			<p>development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>TT9 Tranent Cluster</p> <p>Gladsmuir East</p>	Support	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>A FRA has been required and we assume this is to assess the risk of surface water flooding.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and</p>

			uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.
TT10 Tranent Cluster  Tynemount West (Ormistoun)	Support	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>A FRA has been required and we assume this is to assess the risk of surface water flooding.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
TT11 Tranent Cluster	Support	We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany	A principal aim of development plans is the promotion of safe and resilient communities and

<p>Elphinstone West</p>		<p>planning applications at this site.</p> <p><b>A FRA has been required and we assume this is to assess the risk of surface water flooding.</b></p>	<p>businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>TT12</p> <p>Tranent Cluster</p> <p>Woodhall Road (Pencaitland)</p>	<p>Support</p>	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>A small watercourse is located along eastern boundary and appears to be culverted. The FRA should assess the risk of flooding and route of the culvert.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation</p>

			<p>including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>TT13 Tranent Cluster</p> <p>Lempockwells Road (Pencaitland)</p>	Support	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>There is a history of pluvial flooding on Huntlaw Road with runoff from farm field entering the road and threatening properties. A basic FRA was submitted in support of the 2014 application but it did not determine the functional floodplain.</b></p> <p><b>The FRA should determine the functional floodplain. Although no surface water flood risk is shown on the SEPA maps, the FRA should assess this risk in light of the historic information.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management.</p> <p>Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul>



			<p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>HN2 Haddington Cluster</p> <p>Letham Mains</p>	<p>Objection</p>	<p>We consider that a Flood Risk Assessment (FRA) to accompany planning applications at this site should be included as requirement for development of this site.</p> <p><b>The Letham Burn flows along the northern boundary of the allocation it has to be assessed within a FRA.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of</p>

			<p>development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>HN3 Haddington Cluster</p> <p>Dovecot</p>	<p>Support</p>	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>A FRA was carried out as part of planning application 13/00071/PPM to which we had no objection. All development was positioned outwith the functional floodplain</b></p> <p><b>Any new development layout will have to take account of the findings of the FRA. It must be highlighted FRA is required to ensure that any development takes account flood risk.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management.</p> <p>Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and</p>

			uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.
HN5 Haddington Cluster  Land at Gateside West	Objection	<p>We consider that a Flood Risk Assessment (FRA) to accompany planning applications at this site should be included as requirement for development of this site.</p> <p><b>Topographic information was submitted in support of a planning application for this site which showed that there was a 4m height difference between the development and the small watercourse and the site, therefore, was not at fluvial flood risk</b>  <b>Unlike allocation HN4, the surface water flood map identifies parts of the development site to be at risk of surface water flooding. This source of flooding should be assessed in the FRA.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
HN7 Haddington Cluster	Objection	We consider that a Flood Risk Assessment (FRA) to accompany planning applications at this site	A principal aim of development plans is the promotion of safe and resilient communities and

Alderston		<p>should be included as requirement for development of this site.</p> <p><b>A small watercourse flows along the western boundary of the site and this has to be considered in a FRA.</b></p>	<p>businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>HN1 Haddington Cluster</p> <p>West Letham</p>	Support	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>The Letham Burn flows along the middle of this site and the St Laurence Burn flows along the eastern boundary.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation</p>

			<p>including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>DR2 Dunbar Cluster</p> <p>Halhill North</p>	Support	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>There is a report that in 2002 Bellhaven Hospital was flooded and patients had to be evacuated with the generator room shut down. We are unsure if any measures have since been put in place to mitigate this risk of flooding</b></p> <p><b>Fluvial flood risk, however, has been identified. A watercourse appears to be culverted within the vicinity of the site. There is also a number of drains flowing within the forestry area adjacent to Lochend Kennels. These appear to be culverted and may flow through</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul>

		<p><b>the site and have to be investigated as part of a FRA.</b></p>	<p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>DR5 Dunbar Cluster</p> <p>Newtonlees North</p>	<p>Support</p>	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>A FRA has been required and we assume this is to assess the risk of surface water flooding.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of</p>

			<p>development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>DR4</p> <p>Dunbar Cluster</p> <p>Brodie Road</p>	Support	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>A FRA has been required, presumably to assess the risk of surface water flooding. It is likely that this source of flood risk will constrain the developable area of the site.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and</p>



			<p>uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>DR7 Dunbar Cluster</p> <p>Land at Spott Road, Dunbar.</p>	Support	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>A FRA has been required and we assume this is to assess the risk of surface water flooding.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>DR8 Dunbar Cluster</p>	Support	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany</p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and</p>

<p>Pencraig Hill</p>		<p>planning applications at this site.</p> <p><b>A FRA has been required. No flood risk has been identified by SEPA and we assume the need for FRA is based on more detailed local knowledge of this site.</b></p>	<p>businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>NK1 North Berwick Cluster</p> <p>Mains Farm</p>	<p>Objection</p>	<p>We consider that a Flood Risk Assessment (FRA) to accompany planning applications at this site should be included as requirement for development of this site.</p> <p><b>We provided comments on a Development Framework by East Lothian Council titled "Mains Far and Gilsland, North Berwick" of 29 March 2011. The framework highlighted that a FRA would be undertaken for each allocation. A</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation</p>

		<p><b>small watercourse is located on the western boundary and could be culverted within the development site. This has to be assessed and no development should occur above any culverted waterbody.</b></p>	<p>including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>NK6 North Berwick Cluster</p> <p>Fire Service College (Gullane)</p>	<p>Support</p>	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>A FRA has been required and we assume this is to assess the risk of surface water flooding.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul>

			<p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
<p>BW1 Blindwells</p> <p>Blindwells Area of Search</p>	<p>Support</p>	<p>We support the inclusion of a requirement for a Flood Risk Assessment (FRA) to accompany planning applications at this site.</p> <p><b>There are issues of flooding associated with the Seton Burn and it is imperative that this development does not increase the risk of flooding downstream. Groundwater flood risk could be an issue, but currently this is controlled by pumping by coal authority.</b></p> <p><b>FRA has to take account the hydrological changes brought about by the mining activity which includes runoff rates and groundwater. There should be no increase in runoff rates downstream. While the risk of flooding and managing surface water might be achievable at present, climate change and the reliance on a pumping strategy by a third party might challenge the sustainability of this large development in the longer term.</b></p>	<p>A principal aim of development plans is the promotion of safe and resilient communities and businesses through sustainable flood risk management. Development plans have a pivotal role to play in delivering sustainable flood risk management through the avoidance of flood risk in the first instance. Delivery of this aim accords with shared duties under a range of legislation including the:</p> <ul style="list-style-type: none"> <li>• Water Environment and Water Services (Scotland) Act 2003,</li> <li>• Flood Risk Management (Scotland) Act 2009; and,</li> <li>• Climate Change (Scotland) Act 2009.</li> </ul> <p>Development plans should identify site requirements to allocations where a potential flood risk has been identified (from any source) to ensure that a site specific Flood Risk Assessment (FRA) is undertaken in advance of the development. This FRA should be used to inform the siting, layout, design and capacity of</p>

			<p>development on the site in a way that avoids an increase in flood risk on and off site and ensures that there is safe dry pedestrian access and egress at times of flood.</p> <p>In addition, the identification in a development plan that a FRA is required reduces the potential for additional costs, delays and uncertainties for planning applications if the need for a FRA is identified late in the process and the siting, design and layout of proposed developed has to be reviewed.</p>
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## **Appendix 2**

### **Supplementary Guidance**

Draft Development Briefs (2016) Supplementary Planning Guidance (SPG)

We welcome the inclusion in the consultation on the Proposed Plan of draft development briefs as SPG.

We will support SPG where they include the detailed information provided in the site assessments which were produced as part of the Strategic Environmental Assessment (SEA).

In particular, we urge East Lothian Council to include two aspects which need to be addressed prior to these sites being identified.

1. Where the need for a Flood Risk Assessment has been identified, this need should be clearly included in the SG.
2. Where there is a question about capacity in the Scottish Water network for both drinking water and sewage, the SG should clearly identify how these issues are going to be resolved, include details of capacity and be clearly linked to specific actions in the Action Programme.

## **Strategic Flood Risk Assessment**

Draft Strategic Flood Risk Assessment (2016) (SFRA)

Throughout the evolution of East Lothian's SFRA, SEPA has consistently advised that for this document to provide as thorough an understanding of flood risk in East Lothian that it is essential that it includes the contribution of East Lothian Council's own flooding officers. From our review of the current SFRA this contribution seems still to be made. The experience and knowledge of East Lothian's own flooding officers should ensure the document provides the most comprehensive identification of flood risk in East Lothian. This more detailed SFRA should be used to inform the SEA, further iterations of the LDP, SPG and applications for development of sites which have not been identified in the PP.

## **Action Programme**

Draft Action Programme. (AP)

As with education, the AP needs to consider in detail the need to work in partnership with Scottish Water to ensure there is a Scottish Water connection or a secure potential for upgrades or new connection to serve new sites and new development. As expressed in this letter and in previous correspondence and discussion with East Lothian Council, SEPA is concerned about the impacts on ground and surface water from a proliferation of private arrangements for foul discharge: this is of particular concern in areas where homes and businesses are dependent on water for drinking and other domestic and business uses on private water supplies, i.e. those drawn locally from the same ground water that is at risk of pollution from a proliferation of private arrangements for sewage

## **Appendix 3**

### **Potentially Vulnerable Area (PVA) details for allocations which fall within a PVA**

In December 2011, SEPA published the National Flood Risk Assessment (NFRA) required by the Flood Risk Management (Scotland) Act 2009. The NFRA identifies areas that are potentially vulnerable to flood risk (Potentially Vulnerable Areas or PVAs). This information does not imply that all sites within a PVA are subject to flood risk.

The NFRA datasets will in future help to support Flood Risk Management Planning by 2015. Development Plans in future will require to have regard to Flood Risk Management Plans.

We have considered the strategic information in the FRMA with respect to PVA locations within the development plan area and would advise that the location of this Development Plan is within the following PVA's and the key information available in the FRMA for these PVAs includes:

#### PVA 10/21

- Summary of main impacts - Assessment of future flood risk and past events shows the coast presents: impact to a large number of residential properties; limited impact to low category community facilities; impact to a large number of commercial properties and impact to sensitive designated sites, with frequent reports of flooding in the area between 1891 and 1894.
- Main sources of flood risk – coastal and pluvial
- Number of existing properties currently at risk - 2025

#### PVA 10/22

- Assessment of future flood risk and past events shows that the River Esk, it's tributaries and the coast present: impact to a large number of residential properties; impact to a large number of commercial properties; limited impact to transport links; impact to high grade agricultural land and impact to extensive area of sensitive designated sites, with infrequent reports of flooding in the area. Existing defences on River North Esk and surface run-off scheme in Penicuik offer partial protection to some of these impacts.
- Main sources of flood risk – coastal, fluvial, and pluvial
- Number of existing properties currently at risk - 707

#### PVA 10/23

- Assessment of future flood risk and past events shows fluvial and coastal sources present: impact to a large number of residential properties; impact to some commercial properties; impact to minor transport links; impact to extensive areas of high grade agricultural land; limited impact to less resilient environmental designation and impact to extensive areas of sensitive designated sites, with infrequent reports of flooding in the area. Existing coastal defences offer partial protection to some of these impacts.
- Main sources of flood risk – coastal, fluvial, and pluvial
- Number of existing properties currently at risk - 380

#### PVA 10/25

- Assessment of future flood risk and past events shows fluvial and coastal sources present: impact to a large number of residential properties; impact to medium category community facilities; limited impact to agriculture and impact to sensitive designated sites, with infrequent reports of flooding in the area between 1862 and 2009.
- Main sources of flood risk – coastal, fluvial, and pluvial
- Number of existing properties currently at risk - 247

Any locations within a Development Plan outwith a PVA, should not be assumed to be free from flood risk. SEPA has produced the NFRA as the first stage of the Flood Risk Management Planning process. This sub-catchment area is not included as a PVA because it is below the threshold of significance of the NFRA/PVA method.