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Additional information:

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

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

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

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

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

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

For further information or advice, please contact:

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

**From:**  
**To:** [Local Development Plan](#)  
**Subject:** Objection to the new Local Development Plan  
**Date:** 04 November 2016 16:55:28

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Dear Sir/Madam,

I am writing as a resident of Gullane to request that the Saltcoats (NK7), Fenton Gait East (NK8) and Fenton Gait South (NK9) proposals be removed from the proposed LDP as earmarked sites for further housing development in the village.

The proposed extent of cumulative development to the village is entirely disproportionate to its current size and would not be handled by the local infrastructure (roads and transport network, schools, GPs, shops, village hall etc). To develop the village to such an extent would lead to an unsafe and stressful environment for both current and future residents. Such over-development cannot be reversed, so it would ask you to carefully consider the long-term detrimental impact of these proposals. I have no objection at all to the development of the old Fire Training School site, which is in desperate need of development to prevent it becoming an eye-sore, so this is not a case of opposing all development. Rather it is the extent of development that is of great concern, as well as the seeming preference of developers to build on prime green field sites.

I have already lodged my objections to the Saltcoats development planning application for similar reasons.

I look forward to your response.

Professor Thomas Gillingwater

**From:**  
**To:** [Local Development Plan](#)  
**Subject:** Representation to East Lothian Local Development Plan - Proposed Plan  
**Date:** 04 November 2016 16:59:14  
**Attachments:** [FRA.pdf](#)  
[Haddington - Figures 1 - 3.pdf](#)  
[Letter from Transport Scotland.pdf](#)  
[Representation to the ELP - Proposed Plan - October 2016.pdf](#)

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Dear Sirs

Please find attached a representation to the East Lothian Local Development Plan – Proposed Plan on behalf of Lord Wemyss Trust with associated attachments.

I have tried to upload this onto your consultation hub today but this failed stating that the service is unavailable.

I trust this is acceptable, can you please confirm receipt in writing.

Kind regards

Christine A Stuart  
Farningham Planning Ltd  
The Bourse, Suite 107  
47 Timber Bush  
Leith  
Edinburgh  
EH6 6QH

Email: [christine.stuart@farnmac.co.uk](mailto:christine.stuart@farnmac.co.uk)



**The Lord Wemyss Trust objects to the following aspects of the East Lothian Local Development Plan – Proposed Plan:**

- 1.0 **Paragraphs 2.114 and 2.116, Page 40  
Inset Map 20 - Haddington  
Policy DC8 – Countryside Around Towns**
- 2.0 As stated in **Paragraph 5.16** of the **Proposed Plan**, it is acknowledged that certain parts of East Lothian's landscape are of particular importance and merit a degree of enhanced protection. It is further acknowledged that in preparing Local Development Plans, Local Authorities are encouraged by Scottish Government to protect and enhance the character, landscape setting and identity of settlements (**SPP, Paragraph 49**). It is also recognised that **Policy 13** of **SESPlan** advises that Local Development Plans should review countryside designations.
- 3.0 **The Lord Wemyss Trust objects** to the reference in **Paragraph 2.116, Page 40** of the **Proposed Plan** which states that the open land to the north of the Tyne is an important area to the town's character and setting.
- 4.0 It also **objects** to **Policy DC8 – Countryside Around Town, Inset Map 20 – Haddington** and the statement in **Paragraph 2.114, Page 40** of the **Proposed Plan**, which states that "into the longer term, the only suitable location for further significant expansion of Haddington maybe in the wider Dovecot area". There is no justification for this statement provided in the Plan.
- 5.0 The subject **land at Amisfield Mains, Haddington** as outlined in red on the attached **Figure 1 - Aerial Photograph** and **Figure 2 - Site Plan** forms an integral part of the area of land referred to in **Paragraph 2.116** of the **Proposed Plan** which is considered unremarkable in landscape terms being physically contained by the A1 road to the north, established housing to the west and the Haddington Golf Course to the south. If the landscape was that special it would be covered by a specific landscape designation. It is not.
- 6.0 There is no justification in the Plan for designating a Countryside Around Towns policy for Haddington as articulated by DC8. In this regard, it is considered that the Council's extant Development in the Countryside Policy DC1 as amended by the various Policies DC1 to DC7 inclusive contained in the Proposed Plan in relation to the 'Countryside', has performed as an effective 'Greenbelt' policy for a significant number of years and, as such, there is no justification for applying a further layer of policy restriction. In very simple terms, there is no need.
- 7.0 Furthermore, such a designation unnecessarily prejudices the potential for an easterly extension of Haddington in the future, if housing requirements predict the need for such an approach.
- 8.0 In applying **Policy DC8**, the content of **Paragraphs 5.21 and 5.22, Page 123** of the **Proposed Plan** would clearly suggest its introduction is primarily aimed at avoiding coalescence between settlements. Coalescence is not an issue with Haddington and the landscape around Haddington which the policy seeks to retain and conserve, particularly the subject land at Amisfield Mains, north of the Tyne, has no special quality or status. It is

simply countryside outwith the current recognised settlement boundary for Haddington within which development, save a few exceptions, is not permitted, as articulated by current and proposed Countryside policies. The Countryside Around Towns policy adds nothing positive to the development management regime for the area.

- 9.0 Haddington lies within the Haddington Plain Landscape Type as defined in the Lothians Landscape Character Assessment, published by Scottish Natural Heritage in 1998. The 'Guidelines' in the SNH study recommend that landowners should "promote woodland planting in scale with the landscape character as an advance landscape framework for any future mineral extraction or urban edge development". (**Page 71**)
- 10.0 The land at **Amisfield Mains, Haddington** abuts an established housing development at Abbots View to the west, with the A1 road corridor and the River Tyne defining the site to the north and south respectively. In recent years, the surrounding landscape has seen the introduction of significant new infrastructure features with elevated highways and dual separated junctions.
- 11.0 The **Lord Wemyss Trust** acknowledges the role to be played by Haddington as the 'County Town' of East Lothian and, as such, is seeking to help facilitate a high quality, residential-led mixed-use development in a very accessible location next to the A1 and, within close proximity of Haddington's town centre with its extensive range of services and facilities. In this regard, the site provides for a logical, sustainable extension to the east of the settlement in the short, medium or longer term, balancing the recent pattern of growth in the town as detailed in the Proposed Plan which has principally focussed on land to the west of Letham Mains and Gateside.
- 12.0 **Figure 3, Constraints and Opportunities Plan** attached illustrates how the subject land relates to the key features in and around Haddington, with the town centre being only 500no. metres from the site's western boundary. There is also the potential to form a direct pedestrian route linking the new development and the existing footpath network into the town centre. The subject land is actually located sustainably closer to the town centre than the land currently proposed in the Plan for residential development at Letham Mains and Gateside.
- 13.0 The southern part of the site falls within the River Tyne flood plain. This was previously considered to be an issue as highlighted by the Reporter following examination of the now adopted East Lothian Local Plan 2008.
- 14.0 There is however no intention to develop within the flood plain, with all of the proposed built development being confined to the higher ground to the north of the site which falls outwith the flood plain. Therefore, consistent with **Paragraph 256 of SPP** and **SESPlan Policy 15** and, contrary to the comments contained on **Page 125 of the Main Issues Report (MIR)** in respect of the site (Ref: OTH-H6), flood risk is not an issue. This is confirmed by the flood risk assessments carried out by the Trust's consultants Fairhurst (attached) and ratified by the Council's own studies.
- 15.0 In addition to flood issues, site access was previously considered to be a constraint to development as also referred to on **Page 125 of the MIR** (Ref: OTH-H6). Firstly, the local road network serving the existing housing at Abbots View does not have sufficient capacity to

- accommodate any significant level of new development and secondly, it was previously considered that the upgraded A1 road corridor located immediately to the north of the site, restricted the potential for access to Amisfield Mains from the north.
- 16.0 However, following a comprehensive assessment of the site's access opportunities and a number of detailed discussions with representatives of Transport Scotland, through upgrading and reconfiguring the southern roundabout at the Abbots View junction on the A1, the site can be made accessible to satisfactorily accommodate a significant level of new development.
- 17.0 A general arrangement drawing (Ref No. 85569-P-103) illustrating the potential for the new road layout, requiring limited alterations to the local road network, has been agreed in principle with representatives of Transport Scotland. This is attached with an accompanying letter from Transport Scotland dated 09 December 2011.
- 18.0 With regard to the potential impact that future development on the subject land could have on the adjoining Amisfield Designed Landscape and Conservation Area, the Park is already viewed within the context of built development extending out from Haddington. In addition, Amisfield Park has been significantly altered over the years to accommodate Haddington Golf Course and no longer retains Amisfield House within the landscape. This was demolished and replaced by the current golf club facility.
- 19.0 As a consequence, the landscape now has a very suburban golf course character with a clear recreational based focus to it, centred around the golf course structure and fairways. Whilst Amisfield Park retains a landscape value, its historic qualities have been materially altered by the establishment and management of the golf course and, as such, it is not considered that development on the subject land would adversely impact on the character and wider landscape setting of Haddington.
- 20.0 The reinstatement of the woodland belts across the adjoining Trust land as part of a future strategy for the site, would make a positive contribution to the wider setting of Haddington and, in turn, help to restore visual links between the landscape components on both the northern and southern sides of the River Tyne. Views to Amisfield Park from the A1 corridor would remain.
- 21.0 New housing would provide a range of house types including affordable homes to meet the Council's current policies.
- 22.0 The access strategy would take advantage of the site's close proximity to both the established settlement form as well as the upgraded road network nearby. As agreed with Transport Scotland, the intention would be to reconfigure the southern roundabout at Abbots View junction onto the A1 to provide a new road access into the site with a secondary access route offered to the east, linked to the bridge at Abbey Toll and designed to comply with guidance, but used mainly for leisure purposes or cyclists getting access to the wider rural road network.
- 23.0 The road network across the development would be planned carefully with Transportation Officers from East Lothian Council with a distinct hierarchy providing links to the wider community. '**Designing Streets**' policy would also be fully adopted to ensure that the car does not dominate the streetscene with car parking provided in curtilage where possible or in

small courtyards. Visitor parking would be located at accessible points across the development. This would be designed as part of a wider traffic calming strategy, with on-street car parking allowed to help slow traffic down.

24.0 The site also compares favourably with the criteria for assessing 'effectiveness' listed in **Paragraph 55 of PAN2/2010: Affordable Housing and Housing Land Audits** as follows:

- **Ownership:** The site is within the sole ownership of a landowner who is fully committed to releasing the site for housing development.
- **Physical:** There are no known constraints such as flood risk or ground stability associated with the site. Furthermore, as detailed in the letter from Transport Scotland dated 09 December, 2011, the site can be accessed off the adjoining road network in a safe and satisfactory manner in accordance with the appropriate engineering and safety standards.
- **Contamination:** The site has no history of potential contamination land uses which would prejudice its ability to be developed for housing.
- **Deficit Funding:** There is no requirement for any funding to be committed by public bodies to make residential development of the site economically viable.
- **Marketability:** The site is located within a well established housing market area and can be developed and delivered within the plan period with confidence.
- **Infrastructure:** There are no known infrastructural constraints to development of the site which cannot be satisfactorily addressed.
- **Land Use:** Housing is the sole predominant use for the site in association with an element of employment generating uses.

25.0 In identifying greenfield sites within the **Strategic Development Area** for housing, **Policy 7 of SESPlan** requires such sites to satisfy each of the following criteria:

- a) The development will be in keeping with the character of the settlement and local area;
- b) The development will not undermine green belt objectives; and,
- c) Any additional infrastructure required as a result of the development is either committed or to be funded by the developer.

26.0 The proposed site compares favourably with each of the above criteria in that it is located outwith green belt; development of the site would be in keeping with the established character of Haddington; and, any additional infrastructure required to accommodate the development would be funded by the landowner/future housebuilder.

27.0 **SPP** highlights the need to direct the right development to the right place (**Paragraph 40**) and to create high quality places by taking a design-led approach (**Paragraph 38**) which demonstrates the six qualities of a successful place which is to be: distinctive, safe and

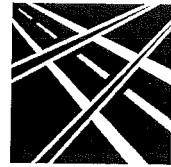
pleasant, welcoming, adaptable, resource efficient and, easy to move around and beyond.  
**(Paragraphs 41-46 inclusive).**

- 28.0 Such an approach would be adopted in presenting future proposals for the site whether in the short, medium or longer term and, as a consequence, the allocation of the site for housing purposes would be wholly consistent with Scottish Government objectives of delivering high quality, design-led residential environments in sustainable locations.

*Farningham Planning Ltd on behalf of The Lord Wemyss Trust  
October 2016*

Network Operations  
**Trunk Road and Bus Operations**

Buchanan House, 58 Port Dundas Road, Glasgow G4 0HF  
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CÒMHDHAIL  
ALBA

**TRANSPORT  
SCOTLAND**

Fairhurst  
43 George Street,  
Edinburgh,  
EH2 2HT  
FAO Ian Marsh

Your ref:  
85569/MLD

Our ref:  
SE111411

Date:  
9 December 2011

Dear Ian

### **POTENTIAL DEVELOPMENT PLAN ALLOCATION – LAND EAST OF HADDINGTON**

I refer to your letter of the 25 May 2010 and the numerous emails since then regarding the proposals to alter the A1 roundabout to access the proposed development adjacent to Abbots View in Haddington. I apologise for the excessive delay in responding to you on this matter.

I can confirm that I have now had confirmation from Transport Scotland's Standards Branch that the proposal indicated on drawing 85569-P-103-Rev A for the sixth arm to the south roundabout of Abbotsview Junction would be acceptable in principle. This is subject to achieving a DMRB compliant design, undertaking appropriate capacity and traffic analysis, and an accident study. Any detailed proposal should carefully consider diverge layout including alignment and visibility, signage requirements, and visibility on approaches to the roundabout.

I trust this is satisfactory but should you have any further questions please do not hesitate to contact me.

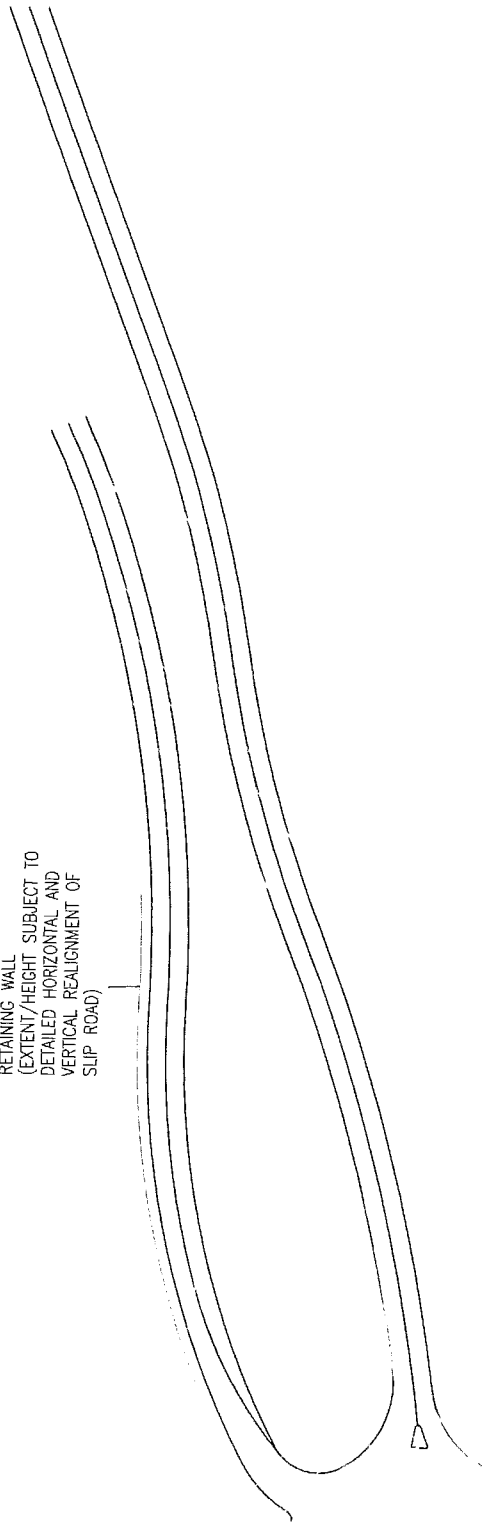
Yours sincerely

Ken Aitken  
Transport Scotland

Do not scale from this drawing.



RETAINING WALL  
(EXTENT/HEIGHT SUBJECT TO  
DETAILED HORIZONTAL AND  
VERTICAL REALIGNMENT OF  
SLIP ROAD)



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Rev.	Date	Description	Drawn	Checked	Approved

1. PROPOSALS SHOWN ARE BASED ON OS MAPPING AND ARE SUBJECT TO DETAILED DESIGN.

Scale of 1:1000  
 Date: 13/05/10  
 Status: PRELIMINARY  
 Drawn: FF  
 Checked: IM  
 Approved: IM  
 Date: 13/05/10  
 Scale: A3  
 Project No: 85569-P-103

Project Title:  
**ACCESS INVESTIGATION EAST OF HADDINGTON**

Drawn Title:  
**ABBOTSVIEW JUNCTION ACCESS OPTION 3**

**FAIRHURST**  
 41 Grove Street, Glasgow, G12 2HT  
 Tel: 0141 221 2141 Fax: 0141 221 2339

85569-P-103

**51285**

**LAND EAST OF HADDINGTON**

**FLOOD RISK ASSESSMENT  
REPORT**

**FINAL REPORT**

**OCTOBER 2002**

**Bryant Homes Limited  
Canal Court  
42 Craiglockart Ave  
EDINBURGH  
EH14 1LT**



**FAIRHURST**

WATER SERVICES DIVISION

**W A Fairhurst & Partners  
Consulting Structural and  
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## CONTENTS

	Page
1.0 INTRODUCTION	1
2.0 LEGISLATIVE FRAMEWORK	2
3.0 HISTORY OF FLOODING & PREVIOUS WORK	3
4.0 EXISTING CONDITIONS	5
5.0 DEVELOPMENT PROPOSALS	6
6.0 HYDROLOGY	7
7.0 HYDRAULIC ANALYSIS OF RIVER TYNE	12
8.0 FLOOD RISK	15
9.0 CONCLUSIONS	16
APPENDIX 1 – Figures	
APPENDIX 2 – Photographs	
APPENDIX 3 – Drawings	

## **1.0 INTRODUCTION**

W. A. Fairhurst & Partners (WAF) was appointed by Bryant Homes Limited through Farningham McCreddie in July 2002 to carry out a desk study reviewing the flood risk at land to the east of Haddington. The development site is situated to the north and south of the River Tyne upstream of the Abbey Bridge.

As part of the desk study an indicative plan was produced showing the likely extent of inundation based on existing information. Land within the inundated areas is unlikely to be suitable for development. The desk study concluded that some of the potential development site was at risk from inundation during extreme flood events.

It was agreed that the scale of the potential development and the likely flood risk justified carrying out a more detailed flood risk assessment. The desk study recommended that the following work be carried out:

- A topographical survey of the area.
- Hydrological analysis to current methods using the Flood Estimation Handbook.
- Hydraulic modelling of the River Tyne through the site.

These activities have been carried out as part of this more detailed flood risk assessment. A More accurate plan showing the extent of inundation in the predicted 1 in 200 year return period event has been prepared and the desk study report has been updated and augmented.

## 2.0 LEGISLATIVE FRAMEWORK

In consideration of planning applications, planning authorities require to be satisfied that due account has been taken of National Planning Policy Guideline 7, Planning and Flooding (NPPG7). It is necessary to show that adequate protection against flooding exists or can be provided for the proposed development and that the development does not increase flood flows and levels upstream and downstream if there is a risk to persons or property.

NPPG7 states that flooding issues will have to be considered in planning applications for development within, or adjacent to a watercourse, and those likely to involve the culverting or diversion of a watercourse, amongst others. Planning authorities normally expect that floor levels of any buildings have an appropriate freeboard above the design flood level. They will also expect to be satisfied that there is no adverse effect elsewhere on the watercourse at the design flow due to the site development.

The Scottish Environment Protection Agency (SEPA) has a duty to offer advice to planning authorities, with respect to the risk of flooding, under the Environment Act 1995, Section 25. SEPA interpret this to include professional and expert interpretation of data or records. The Secretary of State for Scotland's guidance requires SEPA to take a holistic approach to the protection and enhancement of the environment. Planning authorities must consider SEPA's views on the merits of any proposals involving carrying out works or operations in the bed or on the banks of rivers and streams.

The Association of British Insurers has advised that higher standards of protection may be required to obtain flood insurance than those required to gain planning consent. They recommend that the minimum standard of protection for residential development should be against the 1 in 200 year return period flood level, plus an allowance for climate change. Higher standards are recommended for vulnerable areas, such as sheltered housing, ground floor flats and bungalows. Higher standards are also recommended for areas where the scope for flood warning is limited because of the likelihood of flash floods and for certain types of commercial and retail development.

### 3.0 HISTORY OF FLOODING & PREVIOUS WORK

There is a long history of flooding in Haddington. In recent years, this has led to a number of studies being carried out for the local authority. Fairhurst staff visited East Lothian Council Property Services Department to view historical reports on flooding of Haddington. The following reports were made available:

- *Prediction of Extent and Frequency of Flooding at Haddington*, prepared by R J Sargent on behalf of WRc Communications Group for Lothian Regional Council, April 1982.
- *An Investigation into Flooding in Haddington in 1990*, prepared by R J Sargent for Lothian Regional Council, July 1991.
- *Haddington Flood Study - Report on Model Study and Preliminary Scheme Evaluation*, together with an earlier draft report, prepared by Babbie Shaw & Morton for Lothian Regional Council Department of Water & Drainage, June 1994.

The original study by Sargent describes historic severe flooding of Haddington dating back to 1358, identified using archive material. The water levels associated with the earlier events in this historic series cannot be identified from features now existing, but Sargent reported that he found information on water levels associated with a series of more recent severe flood events in 1775, 1846, 1927, 1931, 1948 and 1956. All of these events occurred before the start of modern flow gauging on the River Tyne in 1959.

Sargent considered the event of 12 August 1948 to be the most severe over the period for which water level information was found, although only marginally exceeding the severity of the event in 1775. Sargent associated flow rates in the River Tyne with these events. Sargent's estimated flow of the 1948 event was 255m<sup>3</sup>/s, compared with an estimate of 240m<sup>3</sup>/s for the 1775 event. It should be noted that Sargent used an early numerical model together with flood levels recorded at various points in the town to produce his flow estimates. If the work was repeated using more a modern computer hydraulic model then a different estimate of the 1948 flow could result.

Sargent used the hydrological methods of the Flood Studies Report to give flow return periods corresponding to the historical flood flows estimated using his hydraulic model. He concluded that the 1775 event had a return period of 600 years and the 1948 event a return period of 735 years. He gave the event of 1956, then the most recent severe event, a return period of 55 years. It should be noted that use of more modern hydrological methods alters these associated return periods.

In his report of July 1991, Sargent reviewed the conclusions of his 1982 report in the light of an event on 6 October 1990. He concluded that the event of 1990 was more severe than 1956, with a return period perhaps approaching 100 years, and that the further data available since 1982 tended to confirm the conclusions of his earlier report.

Following a further severe flood event on 1 April 1992, of a similar proportion to the 1990 event, Lothian Regional Council appointed Babbie Shaw & Morton to build a computer hydraulic model of a 6.5km reach of the River Tyne and to prepare preliminary recommendations for flood alleviation. A model was constructed, using MIKE11 software, including the reach downstream of Haddington. The hydraulic model extended from 2.4km upstream of Stevenson

Bridge to 1.8km downstream of Abbey Bridge, which is at the downstream end of the site. The model included the cascade weir that is located close to the centre of the site and Abbey Bridge. The report of June 1994 presents water levels for a flow of 160m<sup>3</sup>/s, reflecting the estimated peak flow of the 1990 event at Haddington. It also gives the effect on water levels of various flood defence proposals. An inundation map included in the report suggests that the 1990 and 1992 events were slightly less severe than 1956. It has been suggested that this reflects dredging work carried out in the river channel in the 1980s. It is understood that no significant engineering works have yet resulted from the 1994 study.

The Wemyss and March Estates Management Company Limited provided some information on historic flooding. Its tenant farmer at Aimsfield Farm, Mr Douglas Morrison has prepared a plan giving information on the parts of the River Tyne most likely to overflow its banks in spate (see Figure 3 in Appendix 1.) The Estate reports that his family has been tenants of the farm for a period in excess of 60 years.

Following correspondence a flood inundation map showing the extent of inundation in the 1948 flood in the town of Haddington was acquired from SEPA (see Figure 4 in Appendix 1). This formed part of the *Haddington Flood Study Report* prepared by Babbie Shaw & Morton in 1994.

#### 4.0 EXISTING CONDITIONS

The site covered by the flood risk assessment consists of an area of about 120ha bounded on the west by the town limits. The site is bounded on the east by the road leading to the Abbey and the Scottish Water sewage treatment works. The existing site consists primarily of farmland with gentle slopes, currently used for grazing, but also includes Haddington Golf Course and scrubland close to the river.

The site is located on both banks of the River Tyne. The River Tyne rises from the northern slopes of the Lammermuir Hills and it has a catchment area of 298 km<sup>2</sup> by the time it reaches the site.

The River Tyne approaches Haddington in a broad sweep from the Distillery park area. The river swings round to approach the Nungate Bridge, its assumed that level are control under normal conditions by the Bermaline Weir along this section. This is located some 190m beyond the bridge. The river swings sharply to the right through 300° before entering a long 1km straight reach to a cascade weir. Some 500m along this straight the river enters the proposed development site. Under normal flow conditions the backwater from the cascade weir affects the whole of this reach, back to the sharp bend. Some 300m beyond the cascade weir the river reaches Abbey Bridge. This is an old masonry arch bridge consisting of three arches with approach roads across the flood plain. The channel gradient steepens considerable beyond the bridge.

Initially an Ordnance Survey digital terrain model (DTM) was used to predict ground levels in the development area for the desk study. Levels in the DTM are numerically interpolated from 5m interval contours and have significant margins of error resulting in vertical accuracy of +/- 1.5-2m.

In order to progress the flood risk assessment further additional survey work was required. Floodplain survey data was collected using a photogrammetry technique and existing aerial photography. This data was used to prepare 0.25m interval contours of the site. In addition the triple span masonry arch bridge, Abbey Bridge was surveyed.

Fairhurst staff visited the site on 6 June 2002 to identify the extent and nature of the flood risk. Access to Haddington Golf Club land was not possible due to the confidential nature of the proposal. The site was viewed from a public right of way that runs along the northern bank of the River Tyne.

Potential risk of localised flooding from inadequate surface water drainage at nearby developments was not considered as part of this study.

## 5.0 DEVELOPMENT PROPOSALS

The proposed Land East of Haddington development site is shown in Figure 5 in Appendix 1. It consists primarily of residential housing at the upstream end of the site and a new golf course extension and the necessary infrastructure.

Information on surface water drainage from the proposed developments is not available at this stage and does not form part of the scope of this report. Potential risk of flooding of the proposed development from any proposed surface water drainage has not been considered. It is anticipated that surface water drainage outflows will be attenuated by use of Sustainable Urban Drainage Systems (SUDS) to prevent increased peak discharge rates to the River Tyne.



## 6.0 HYDROLOGY

The River Tyne has a natural catchment area of 278 km<sup>2</sup> running down from the Lammermuir Hills. The catchment is characterised by steep headwaters draining exposed moorland and broad flat arable valleys.

Some historic flow estimates are available for the River Tyne dating back to the 1700s based on R J Sargent's work. The following events are considered to be of considerable severity:

Year of Event	Calculated Flow (m <sup>3</sup> /s)
1775	240*
1846	168*
1927	128*
1931	136*
1948	255*
1956	138*

Table 1: Historic flood flows at Haddington

\* These values are from an analysis of historic flooding carried out by Sargent using an early numerical model together with flood levels recorded at various points in Haddington.

More recently some flooding occurred in Haddington in 1983 and 1984. A severe flood occurred in 1990, the highest since 1956.

Previous studies, based on the hydrological methods available at the time, have concluded that the events of 1948 and 1775 were both extremely unusual. The reports of R J Sargent, dated 1982 and 1991 suggest that these events had return periods in excess of 500 years. Two events of such long return period would not normally be expected in a historic record extending back about 250 years to the 18<sup>th</sup> century. While such a combination of events is statistically possible, the probability is low. Sargent estimated that the 100-year return period flow was of the order of 150-160m<sup>3</sup>/s. The report of Babbie Shaw & Morton, dated 1994, used a flow of 160m<sup>3</sup>/s, believed to be similar to the 1990 peak flow at Haddington, to evaluate flood defence proposals. The water levels predicted by Babbie's hydraulic model for this event are understood to be significantly lower than recorded flood levels from 1948.

More recent analysis by SEPA, quoted in an attachment to its 1998 planning consultation response, suggests that the 1948 event may have had a return period of about 200 years. The basis for this evaluation was not fully explained, but it was based on an analysis of gauge data from two gauges upstream of Haddington, at Spilmersford and at Lennoxlove on the Giffard Water. This analysis agrees with a subjective assessment of the historic flood history of Haddington, where two events of a similar magnitude have occurred within a period of about 250 years.

As part of this current study, the Flood Estimation Handbook (FEH) was used to

estimate design flows. The FEH was published in January 2000 by the Institute of Hydrology (now the Centre for Ecology and Hydrology, Wallingford), a component body of the Natural Environment Research Council. It was not available at the time of the earlier analyses summarised above. The FEH is the successor to the Flood Studies Report (FSR) and Flood Studies Supplementary Reports also published by the Institute of Hydrology.

There are two flow-gauging stations maintained by SEPA on this part of the River Tyne. The flow gauging station at Spilmersford is about 11.2km upstream of the site. The flow gauging station at East Linton is about 6.6km downstream of the site. Information from the flow gauging stations was requested from SEPA. SEPA provided updated annual maximum data for both stations.

The period of flow records at East Linton gauging station is significantly less than that recommended to use for a single site analysis to estimate the required design flows for a 200 year return period. Therefore, a Flood Estimation Handbook (FEH) approach was adopted to estimate the peak design flows using the updated gauge information.

The pooling group method of the FEH was used to predict the growth curve for the site. A pooling group containing gauged catchments from the FEH database similar to the subject catchment was created. A subject-site specific growth curve was then calculated from the catchments in the pooling group. The estimated QMED at the site was obtained by the data transfer method from the gauge data. The calculated growth curve was applied to the estimated QMED in order to calculate the peak flows at the site for different return periods.

The FEH pooling group analysis for the site was compared with the single site analysis for the station using the updated data East Linton and Spilmersford data received from SEPA. These showed that the pooling group result appeared to substantially underestimate the flow at the site in comparison to the single site analysis of the gauge data.

The flood peaks for the site were then calculated using the rainfall-runoff method, FEH Volume 4. The catchment descriptor information was obtained using the FEH CD-ROM 1999 for the natural catchment. The computer software ISIS Hydrology Module version 2.1 was used to estimate flood hydrographs. The time to peak for the combined catchment was calculated in accordance with the procedures in FEH Volume 4. The resulting flows were compared to the updated East Linton and Spilmersford data. Again these showed that the rainfall runoff results appeared to substantially underestimate the flow at the site.

The data from the gauging stations within the Tyne catchment at East Linton, and Spilmersford was considered in more detail. The data from Lennoxlove was not used further because it was not within the initial pooling group and therefore not considered sufficiently representative of the catchment at Haddington as a whole. Growth curves from analysis of the two remaining single sites were compared. The calculated growth curve from Spilmersford was found to give much higher peak flows when applied to East Linton compared to the East Linton data. It is inferred that the significant volumes of floodplain storage between the two gauges, particularly upstream of Haddington, may render the Spilmersford data unsuitable for use at Haddington.

Despite only having 42 years of historic data, a single site analysis based on the

updated East Linton gauging station was used to estimate flows at Haddington. The estimated 1 in 200 year return period flow was calculated to be 205 m<sup>3</sup>/s. This is considered to be the best estimate that can be made using the existing data. However, unsatisfactorily large margins of error are associated with this estimate

Following further discussion with SEPA regarding the above it was agreed also to consider at the flow of 255 m<sup>3</sup>/s, the peak flow estimated by Sargent for the 1948 flood as part of the analysis. As flows of this order are believed to have occurred at the site at more than one occasion, and in view of the uncertainty of the estimate based on gauge records, it is considered unwise to disregard this information despite the fact that the probability of occurrence of such an event may be lower than a 1 in 200 year flood. It was agreed that the standard of protection of any residential development should not be lower than the estimated flow of the 1948 event

The derived flood hydrographs for the peak flows were generated using a calculated time step; this was done by adjusting the magnitude of the derived hydrograph generated using the rainfall runoff technique discussed above (see Appendix 1 for hydrographs).

The concept of return periods is widely used, but often misunderstood and misinterpreted. An event of return period of 200 years has a 0.5% chance of occurring or being exceeded in any one year. This means that over a long period of time, on average such an event will happen once every 200 years. However in any given period of 200 years it may not happen at all, or may happen several times. Statistical analysis shows that there is a 14% chance of at least one 200 year return period flood occurring in a period of 30 years, and a 29.6% chance in a period of 70 years.

The site has been assessed against a flood event with a return period of 1 in 200 year, as this is the minimum standard regarded as acceptable for domestic insurance.

The estimated peak flows are as follows: -

<b>Flood Event</b>	<b>Peak Flow (m<sup>3</sup>/sec)</b>
1 in 200 year using the East Linton growth curve	205
1948 flood peak flow	255

Table 2: Design peak flows

There is growing evidence of global climate change as a result of human activities. The UK Climate Impacts Programme (UKCIP) is funded by the Department of the Environment to investigate the potential impacts of climate

change in the United Kingdom. The UKCIP has produced assessments of the potential impacts based on rates of increase in global greenhouse gas emissions consistent with the projections of the Intergovernmental Panel on Climate Change (IPCC). In 1998 the UKCIP published their Technical Report No. 1

entitled "Climate Change Scenarios for the United Kingdom". Revised scenarios were published at the end of April 2002. The UKCIP scenarios utilise global climate modelling carried out by the Hadley Centre of the Meteorological Office.

Some of the effects of global climate change are relatively well understood. For example, estimates have been published of the likely range of sea level rise up to the 2080s under the UKCIP 2002 scenarios. These are now being taken into account in the design of coastal defences and structures. The impact on hydrology, and in particular flood hydrology, is much less certain. The Institute of Hydrology has advised that research on the effect of global climate change in the UK is at a very preliminary stage. It is likely to be some time before detailed guidance will be given on revisions to the methods of prediction contained in the Flood Studies Report and Flood Estimation Handbook.

The UKCIP 2002 scenarios indicate modest increases by the 2020s in daily precipitation totals (5-10% increase) in the Haddington area for rainfall return periods of 20 years on an annual basis. Larger increases (15-20% increase) are indicated in the Haddington area by the 2050s. Changes are also predicted on a seasonal basis, with autumn and winter having higher daily precipitation totals for this event than at present, and spring and summer having similar daily precipitation totals for this event than at present. On present evidence there is a probability of some increase within the lifetime of this development due to climate change in the frequency and severity of the type of rainfall events likely to lead to flood risk.

As a result of these increases it is not inconceivable for flood flows of a given return period to increase by 20% by 2050.

The estimated peak flows are as follows: -

<b>Flood Event</b>	<b>Peak Flow (m<sup>3</sup>/sec)</b>
1 in 200 year using the East Linton Rating	205
1 in 200 year + 10 %	225
1948 flood peak flow	255
1948 flow + 10%	280
1948 flow + 20 %	305

Table 3: Design Peak Flow with accommodation for climate change

Due to the uncertainties associated with the flood flows in the River Tyne at Haddington a conservative approach is considered wise in selecting a design flood flow. Therefore the 1948 flood event flow is to be taken as the 1 in 200 year flood flow. This follows in line with the recent analysis carried out by SEPA.

As The Association of British Insurers recommend that the minimum standard of protection for residential development should be against the 1 in 200 year return period flood level, plus an allowance for climate change both the 1948 and 1948 flow plus 20% will be used in the analysis.

## 7.0 HYDRAULIC ANALYSIS OF RIVER TYNE

Water levels in the River Tyne were calculated with a hydraulic computer model constructed using Mike11 software developed by the Danish Hydraulic Institute. Mike11 is an industry-standard software that is in use throughout the world for studies of this type. The computer software was used to carry out a one-dimensional hydrodynamic analysis of the watercourse channel and adjacent flood plains.

Babtie Shaw & Morton originally constructed the model in 1994 as part of the Haddington Flood Study for Lothian Regional Council Department of Water & Drainage. The model has been developed further by Babtie Group for W A Fairhurst & Partners to incorporate Abbey Bridge, a structure that was not included in the original model. In addition the floodplain cross sections have been extended along both banks using new topographical data.

The amended model was run with flood flows from the 6 October 1990 and the 1 April 1992 flood events. The model results were checked against recorded water level information. This was used as a calibration check on the model.

The predicted water levels adjacent to the site are as shown in Tables 6 to 9 below.

Cross Section	Water Level (mAOD)
32	41.90
33	41.57
34	41.17
35	40.69
36	40.72
37	40.06
38	39.93
39	39.60
40	39.45
Upstream of Abbey Bridge	39.39
41	39.11

Table 4: River Tyne 1 in 200 year flood, using the East Linton rating (flow =205m<sup>3</sup>/s)

**51285: Land East of Haddington – Flood Risk Assessment**

<b>Cross Section</b>	<b>Water Level (mAOD)</b>
32	42.04
33	41.71
34	41.29
35	40.81
36	40.84
37	40.24
38	40.10
39	39.78
40	39.64
Upstream of Abbey Bridge	39.59
41	39.30

Table 5: River Tyne 1 in 200 year flood + 10%, using East Linton rating  
(flow =225m3/s)

<b>Cross Section</b>	<b>Water Level (mAOD)</b>
32	42.25
33	41.92
34	41.47
35	40.99
36	41.02
37	40.50
38	40.36
39	40.04
40	39.93
Upstream of Abbey Bridge	39.89
41	39.58

Table 6: River Tyne 1948 flood flow, SEPA's 1 in 200 year flood flow  
(flow =255m3/s)

<b>Cross Section</b>	<b>Water Level (mAOD)</b>
32	42.40
33	42.07
34	41.63
35	41.17
36	41.21
37	40.67
38	40.53
39	40.22
40	40.14
Upstream of Abbey Bridge	40.10
41	39.78

Table 7: River Tyne 1948 flood flow + 10% (flow =280m3/s)

Cross Section	Water Level (mAOD)
32	42.56
33	42.23
34	41.77
35	41.33
36	41.38
37	40.85
38	40.70
39	40.41
40	40.35
Upstream of Abbey Bridge	40.33
41	39.98

Table 8: River Tyne 1948 flood flow + 20% (flow =305m<sup>3</sup>/s)

Water levels predicted by the computer model have been plotted on the site survey to indicate areas likely to be subject to inundation in the 1 in 200 flood event, and the 1 in 200 year flood event with climate change. The areas that are subject to inundation are shown on WAF drawing nos. 51285 / 0004. The drawing shows that extent of flooding coverage.

The flood envelope for the 5 flood flows scenarios covers a similar area as a result of a natural step in the flood plain. Therefore despite the impact flow rate have on the flood levels the resulting impact on flood extents are limited. This shows that we can be confident in the extent of land inundated by floodwaters.



## 8.0 FLOOD RISK

During extreme flood events extensive areas of the site are at risk of flooding. From drawing 51285/0004 we can see that 13.2 hectares south of the river and a further 5.2 hectares north of the river are inundated by floodwater.

The area to the south of the river is at risk of extensive and deep flooding during extreme events, this implies that the land is at risk of flooding during relatively low return period floods. An area of approximately 13.2 hectares is inundated in a 1 in 200-year flood. The depth of flooding on the floodplain varies from 1 to 2m. The main affected area is the low-lying ground next to the River Tyne at the upstream end of the site. If development is to proceed on this area of the site it will be necessary to raise ground levels in order to protect the development. Infilling this area would result in a loss of 200,000m<sup>3</sup> of floodplain storage. This is a relatively large loss of floodplain storage on a watercourse of this size. Any reduction in floodplain storage will tend to result in raised downstream water levels. There could also be a local effect on water levels at the site and upstream due to loss of hydraulic capacity

The floodplain to the north of the river is in general less prone to flooding than the southern floodplain. An area of 5.2hectares upstream of the cascade weir is inundated during extreme flood events. The depth of flooding during a flow equivalent to the 1948 flood would result in flooding to a depth of 1.2m. This is equivalent to 65,500m<sup>3</sup> of floodplain storage. The remainder of the proposed development site to the north of the river, some 19 hectares that is proposed for housing is beyond the 1 in 200 year flood envelope.

As a result of future climate change flood flows with the catchment could increase by as much as 20% within the next 50 years. This would result in an increase in water levels within the site of between 300mm and 440mm at the upstream end and downstream end of the site respectively. As a result of these increased flood depths the floodplain storage provided within the site increases by some 21%. This would have to be taken into account in assessing the loss of floodplain storage. This results in 321,000m<sup>3</sup> of floodplain storage within the site.

The area further upstream which was originally thought to be at risk using the OS contour data has been found to be above the flood level.

A freeboard of at least 600mm should be allowed above predicted flood levels to take account of uncertainties in the flow estimation, inaccuracies in the modelling, wind generated waves and an allowance for future climate change.

Loss of floodplain storage would be contrary to NPPG 7 if it created or exacerbated an unmanageable risk of flooding at the site or elsewhere. If new flood storage areas are to be created care should be taken in ensuring that any new storage areas are not inundated at high probability floods. The new storage areas would need to come into effect in flood events of the same frequency as the storage areas that are lost, maintaining the pre development flood behaviour. Therefore, it may not be considered appropriate to develop on the low-lying ground to the south of the river and to the north of the river upstream of the cascade weir.

## 9.0 CONCLUSIONS

Parts of the site east of Haddington is subject to flooding in the recommended 200 year return period design event. If development is to proceed on parts of the site subject to flooding, it will be necessary to raise ground levels in order to protect the development. A freeboard of at least 600mm should be allowed above predicted 1 in 200 year flood levels to take account of uncertainties in the flow estimation, inaccuracies in the modelling, wind generated waves and an allowance for future climate change.

As the extent and nature of the proposed developments are not yet finalised, it is not possible to state definitely the impact these may have on water levels in the area. Any reduction in floodplain storage will tend to result in raised downstream water levels. Reducing the conveyance area can also increase the water level upstream of the site. The floodplain storage in question is relatively large and therefore a reduction in storage would potentially have a large impact on flood flows downstream and flood levels upstream. Loss of floodplain storage would be contrary to NPPG 7 if it created or exacerbated an unmanageable risk of flooding at the site or elsewhere. If infilling to raise ground levels is considered necessary the developer should consider provision of alternative compensation storage to ensure no increase in flood flows or water levels.

The volume of flood storage required to compensate for the loss of floodplain storage at the site is in the order of 321,000 m<sup>3</sup>. Additional defences may also be required within the town of Haddington to compensate for the raised flood levels upstream of the site resulting from the loss of hydraulic capacity. Therefore, it may not be considered appropriate to develop on the low-lying ground adjacent to the River Tyne, both on the northern and southern floodplain upstream of the cascade weir.

# **APPENDIX**

<b>APPENDIX A</b>	<b>FIGURES</b>
<b>APPENDIX B</b>	<b>PHOTOGRAPHS</b>
<b>APPENDIX C</b>	<b>DRAWINGS</b>

## **APPENDIX A**

### **FIGURES**

51285 : Land East of Haddington  
FLOOD RISK ASSESSMENT

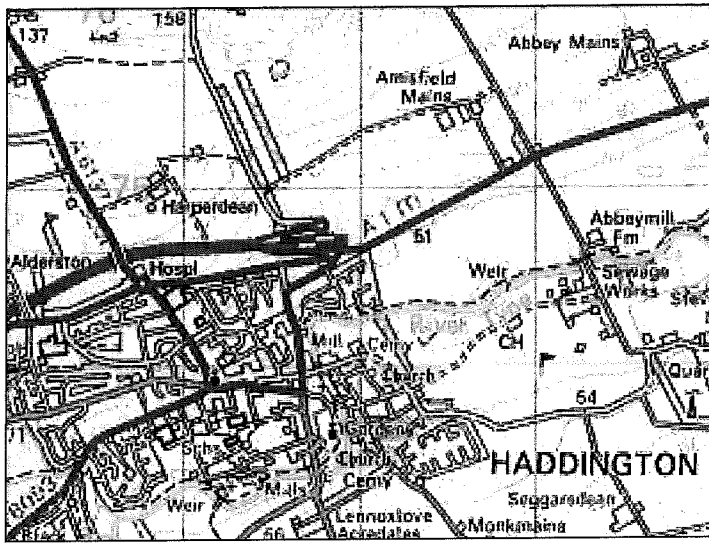


Figure 1 Location Plan

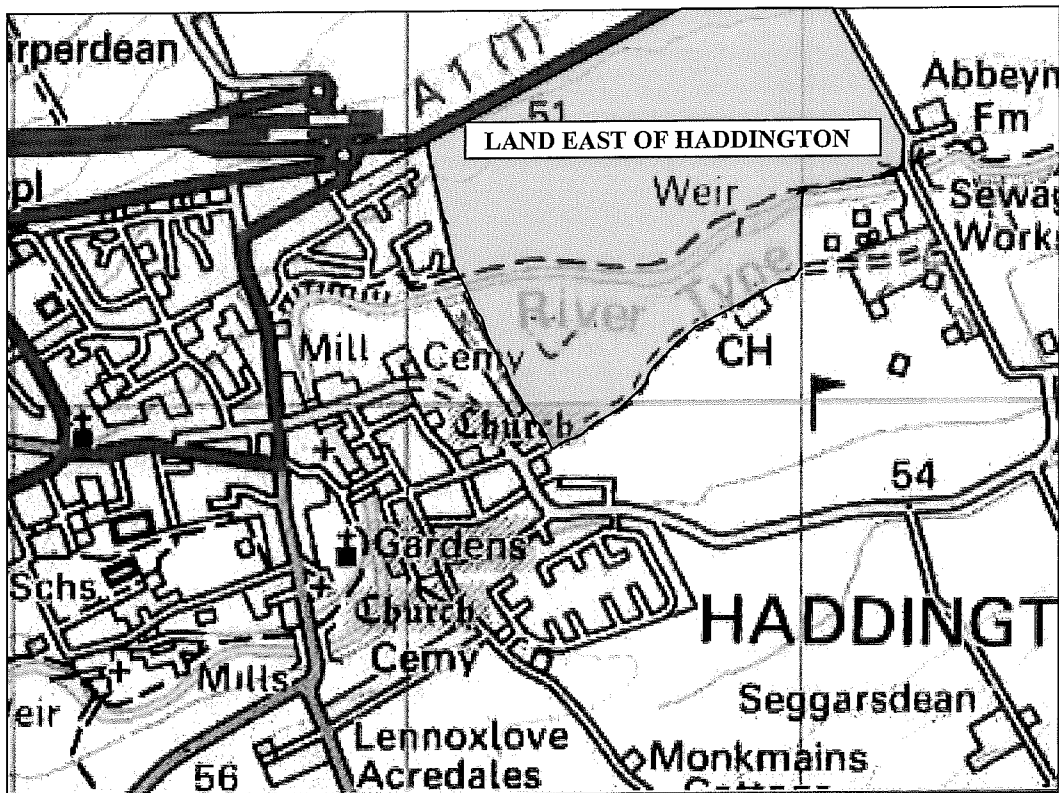
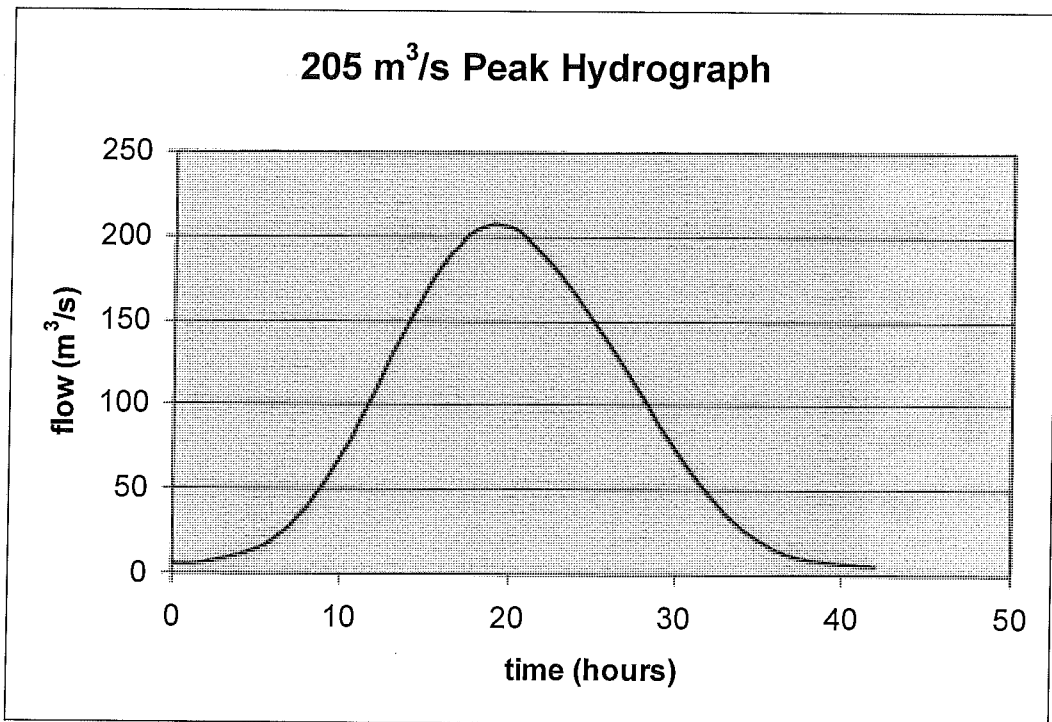
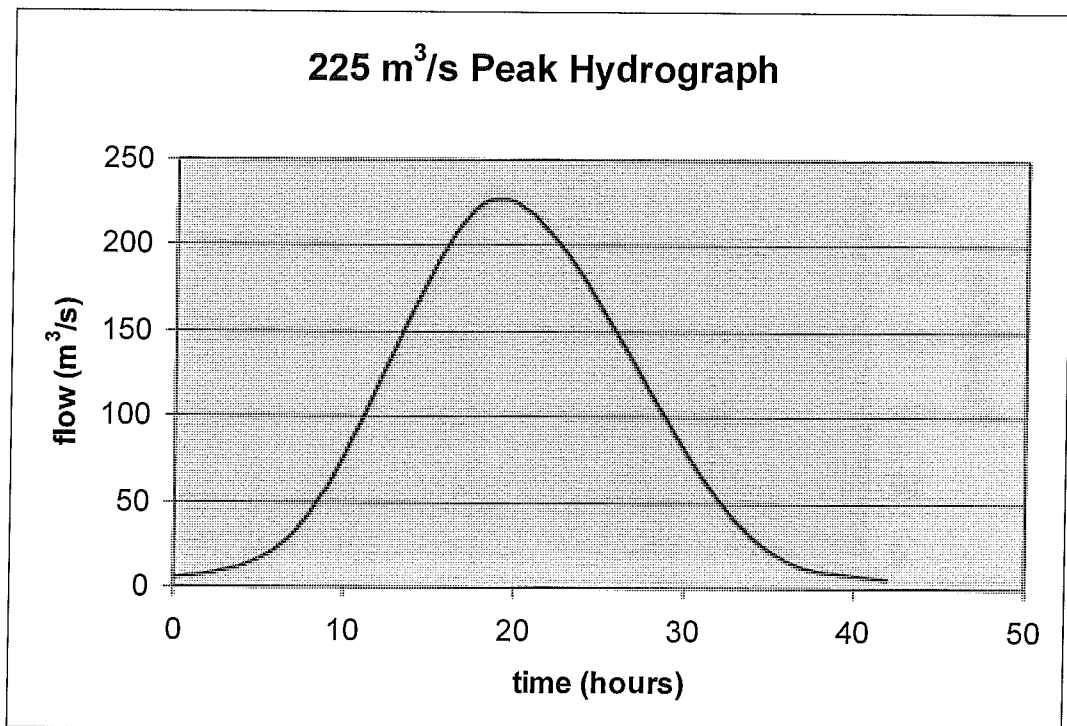


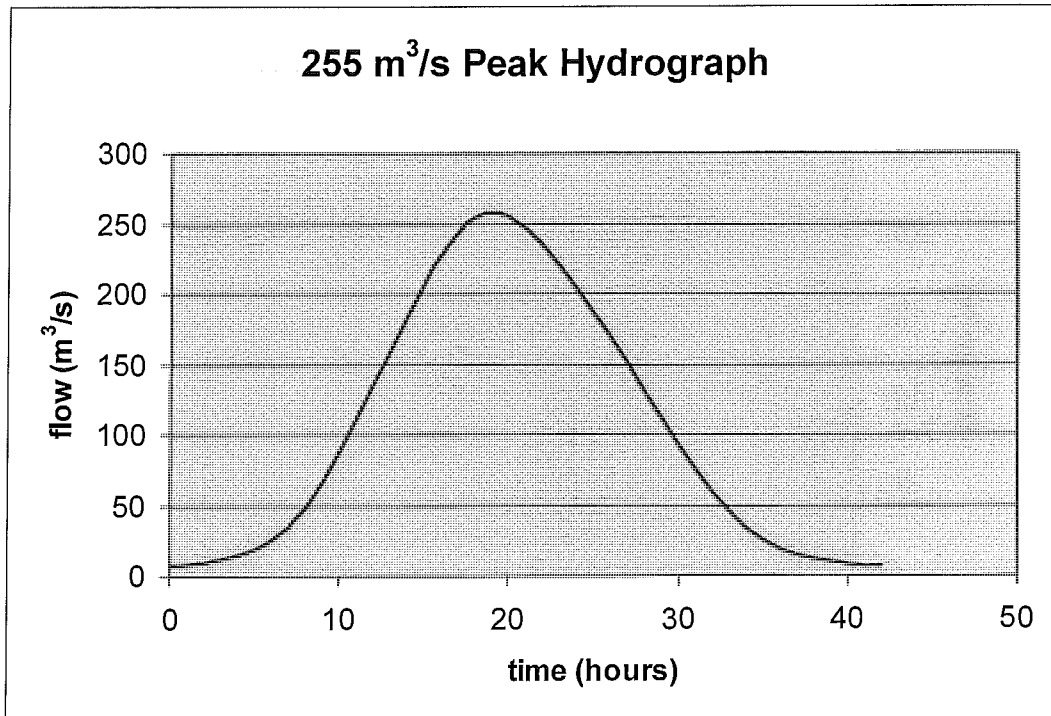
Figure 2 Extents of Development



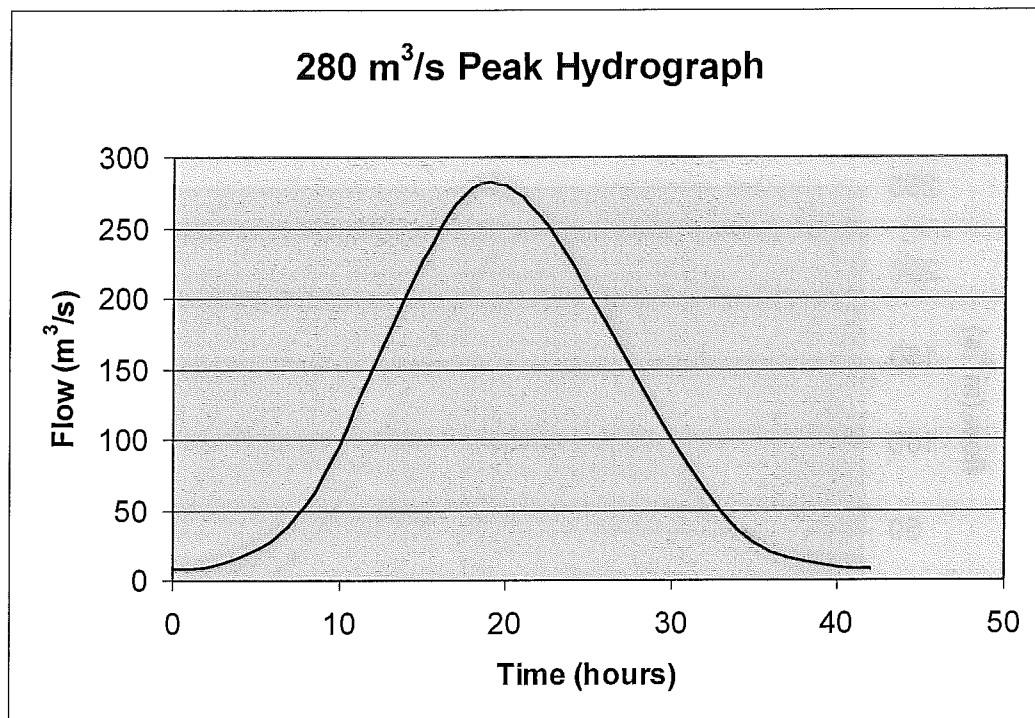
Calculated 1 in 200 year design flood hydrograph



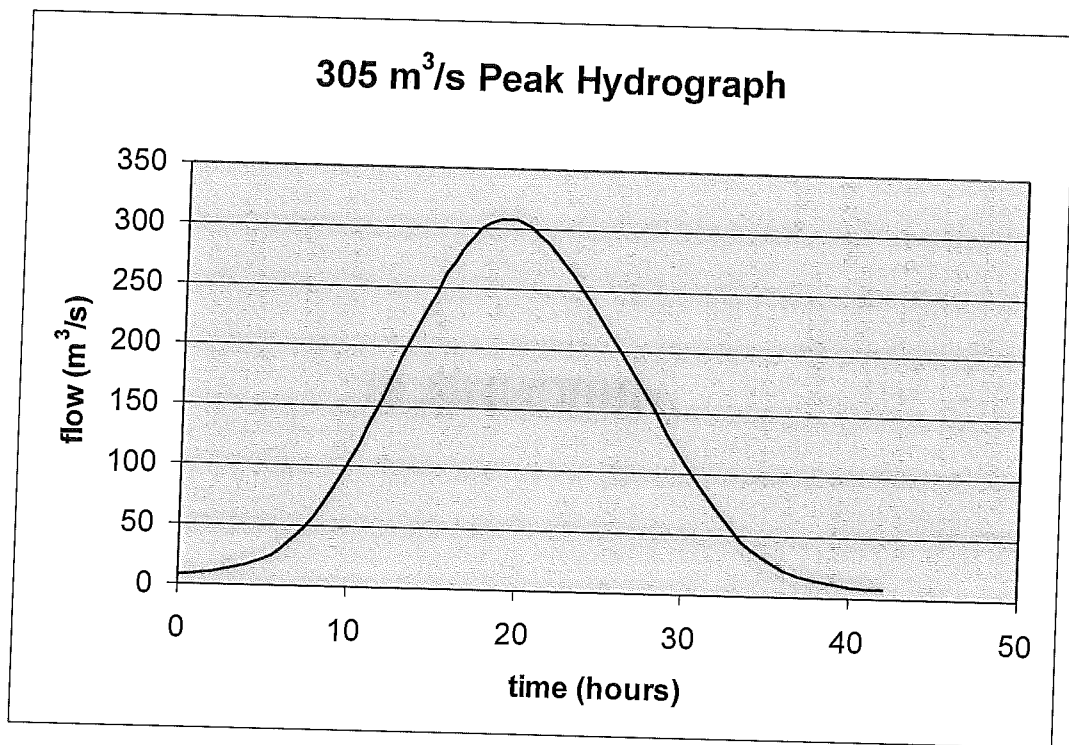
Calculated 1 in 200 year (+ 10 %) design flood hydrograph



1948 Flood Peak Flow design flood hydrograph



1948 Flood Peak Flow (+10%) design flood hydrograph



1948 Flood Peak Flow (+20%) design flood hydrograph



## **APPENDIX B**

## **PHOTOGRAPHS**

**51285 : Land East of Haddington**  
FLOOD RISK ASSESSMENT

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Photograph 1: Northern Floodplain, left hand bank looking upstream towards Haddington.



Photograph 2: Northern Floodplain, left hand bank looking downstream.

**51285 : Land East of Haddington**  
FLOOD RISK ASSESSMENT

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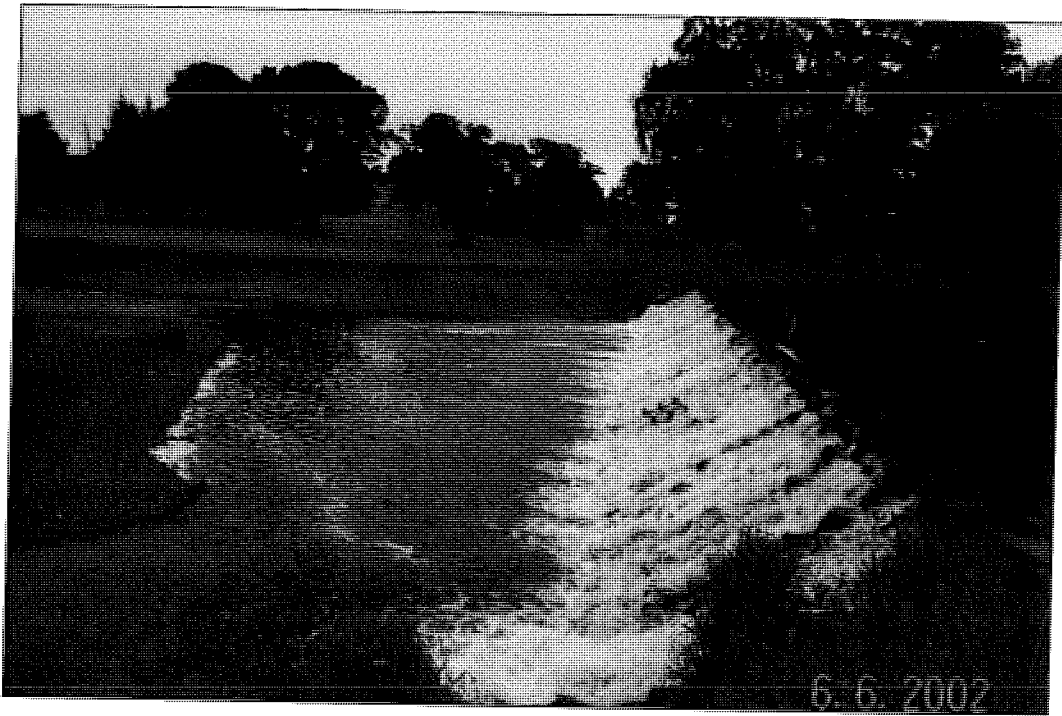
Photograph 3: Southern Floodplain, right hand bank looking downstream across golf course towards Haddington.



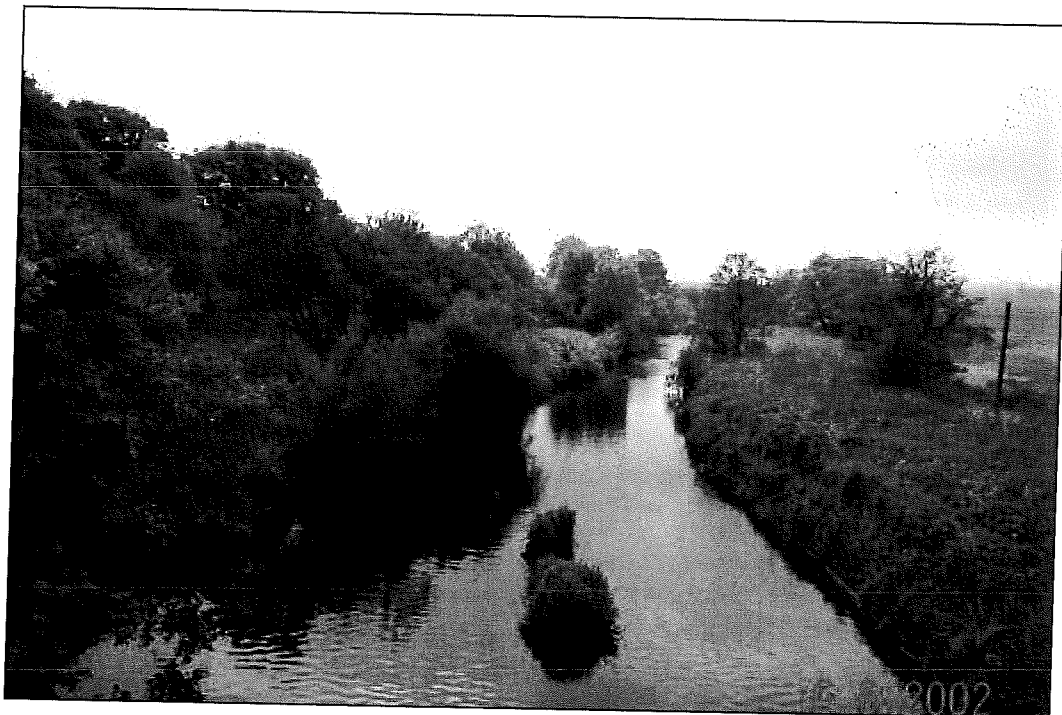
Photograph 4: River Tyne looking downstream through site.

**51285 : Land East of Haddington**  
FLOOD RISK ASSESSMENT

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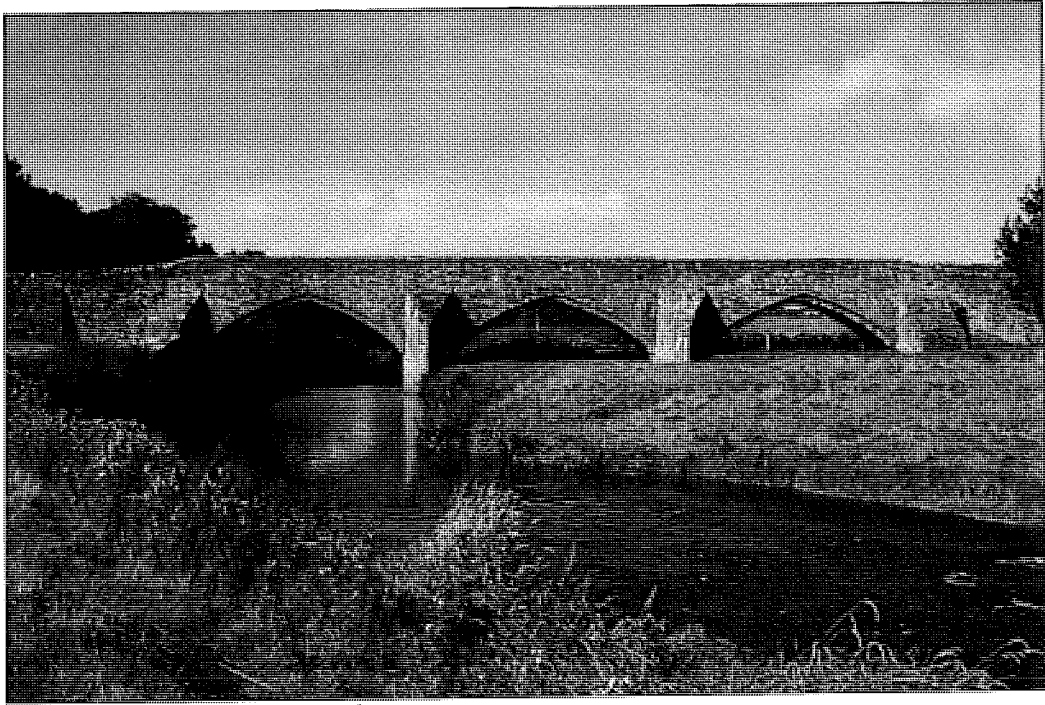
Photograph 5: Cascade Weir



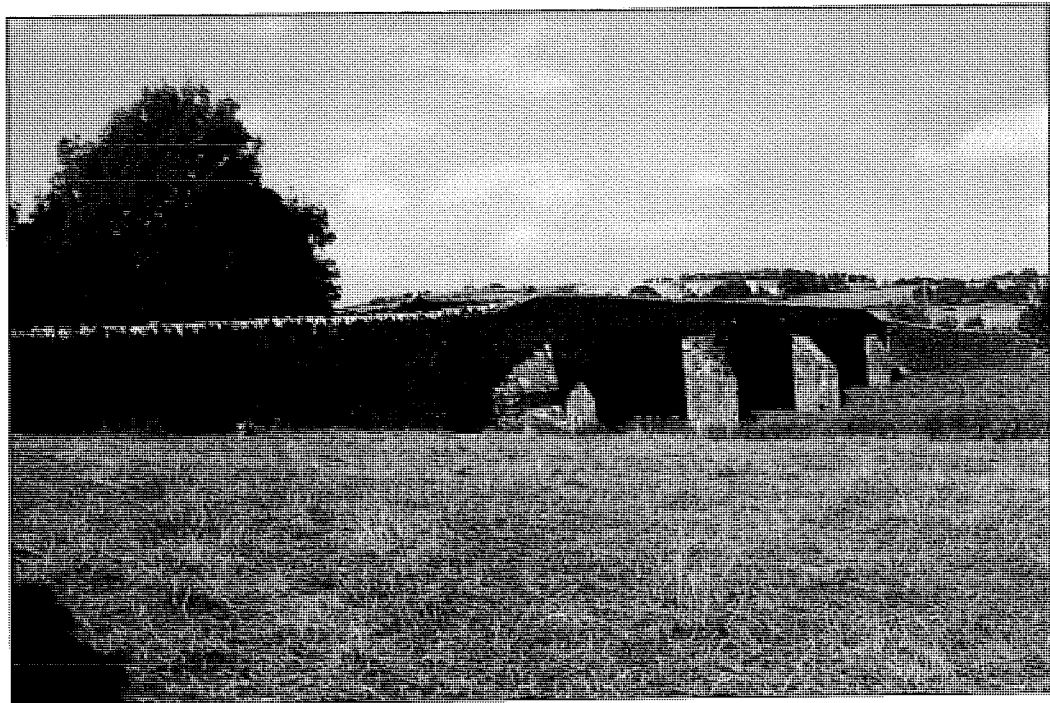
Photograph 6: River Tyne looking upstream from Abbey Bridge

**51285 : Land East of Haddington**  
FLOOD RISK ASSESSMENT

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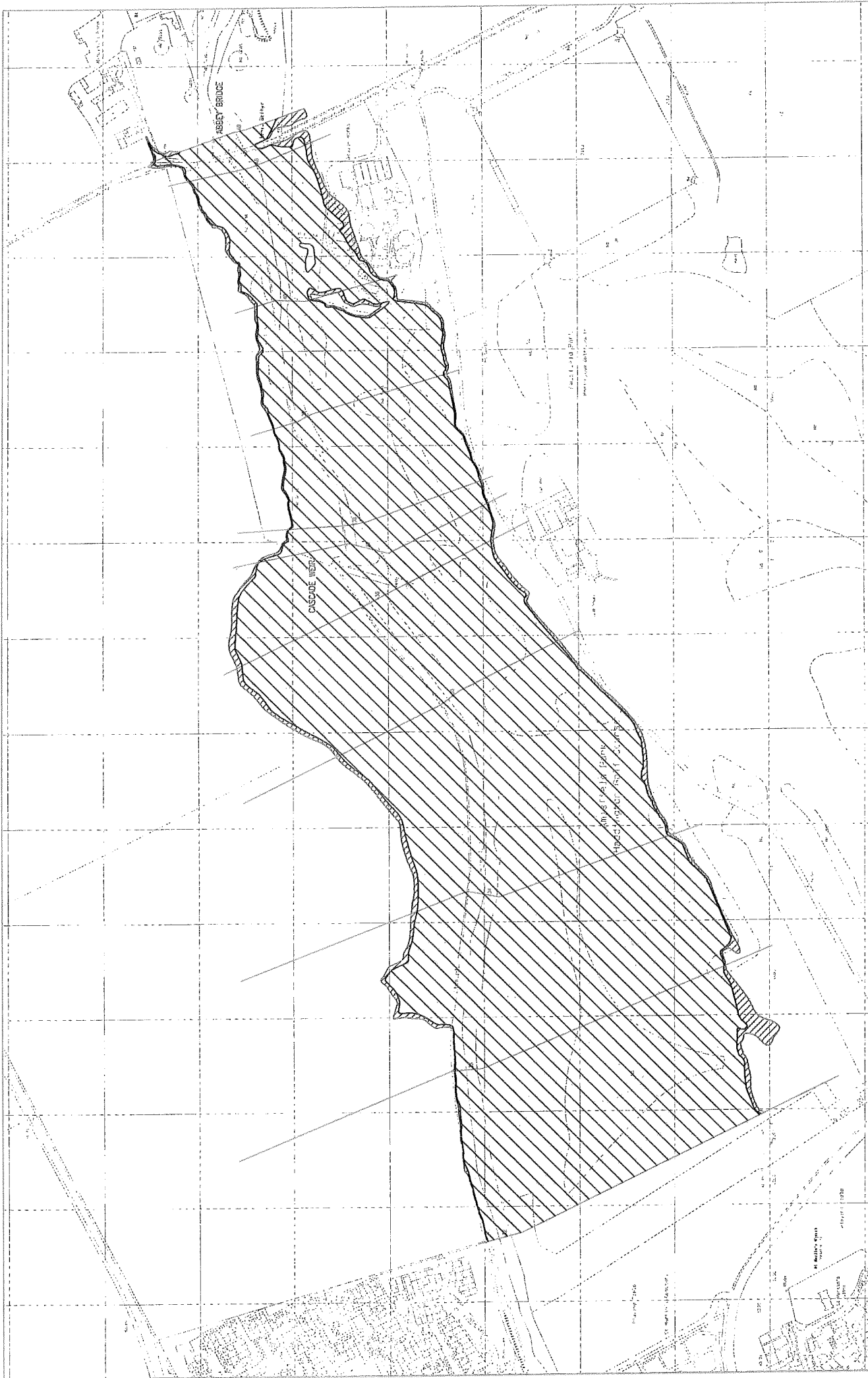
Photograph 7: Downstream elevation of Abbey Bridge



Photograph 8: Downstream elevation of Abbey Bridge and approaches.

## **APPENDIX C**

## **DRAWINGS**



**PROPOSED DEVELOPMENT OF LAND TO THE EAST OF HADDINGTON**

**CONTOUR PLAN SHOWING 1948 FLOOD ENVELOPE**

Scale: 1 inch = 100 feet

North Arrow

DATE	1948
BY	W. H. H. & SONS
FOR	MR. J. H. H. & SONS
PROJECT	11 HADDINGTON

51285/004

Direct Dial 0131 2256741

Ref: 85026/DH

East Lothian Council,  
John Muir House  
Haddington  
East Lothian  
EH41 3HA

21<sup>st</sup> July 2010

**For the attention of Murray Hutchinson**

Dear Sir

**85026: LAND EAST OF HADDINGTON  
REVIEW OF FLOOD RISK TO SITE BASED ON ELC REPORT**

Further to our previous discussions with regard to the flood risk to the site to the east of Haddington we write to confirm that we have now received and reviewed the findings of the Council report that was prepared by Jacobs.

As part of the Local Plan Inquiry our client Wemyss and March Estate objected to the non allocation of land at Amisfield, Haddington for residential development in the local plan.

As part of the case by our client a comprehensive flood study was carried out for the site. based on the findings of the study it was acknowledged that part of the site adjacent to the River Tyne was at risk of flooding in the indicative 1 in 200 year flood event and that a sequential approach to developing the site was to be adopted with some area of the site remaining undeveloped whilst other areas would be landraised and compensatory storage being provided. The flood study was prepared in support of land allocation and not a detailed application and hence no final development were developed.

In their repose East Lothian Council *indicated that the site was located within an area of medium to high flood risk and its development would be contrary to national policy.* SEPA also stated that in their *opinion there should be a clear presumption against development on the large portion of the site that was adjacent to the River Tyne.*

*In the flood study prepared in support of the allocation of the land it was acknowledged that the low lying area next to the River Tume was at risk and that*

*In the conclusion of the Reporters findings it stated that it was appreciated that further work had been commissioned by the council on the issue of flooding in the area and that it would not be appropriate or prudent to identify the land at Amisfield for housing until the matter had been fully resolved.*

The further work that was commissioned by the Council has now been completed and the extent of the area at flood risk form the River Tyne has hence been resolved by the Council.

Cont...



21<sup>st</sup> July 2010

Following receipt of a copy of the Council flood report we have carried out a review of the reports findings together with a comparison with the findings of the original flood risk assessment report carried out by Fairhurst.

The hydrological assessment carried out by Fairhurst was based on a similar methodology to that adopted by Jacobs. The pooling group derived as part of the study underestimate the return period flows in line with the Jacobs assessment. The single site analysis carried out by Fairhurst resulted in lower flows, more data has since been collected which results in changes to the frequency analysis and hence the return period flows. Fairhurst used the 1948 event as the design event with a flow of 255 m<sup>3</sup>/s, in comparison the Jacobs 1 in 200 year design flows was 262 m<sup>3</sup>/s. Both flows are of the same order and within an acceptable variation.

The hydraulic modelling work that formed the Fairhurst assessment was carried out by Jacobs using their previous MIKE 11 model. As part of the flood study undertaken by Jacobs for the Council the Mike 11 model was converted to an ISIS model, a more widely used modelling platform. The flood level results for the 1 in 200 year plus climate change event based on the Fairhurst and Jacobs study are summarised in Table 1.

Cross Section	Flood Level (mAOD)		Change (m)
	Fairhurst	Jacobs	
32	42.56	42.2	-0.36
33	42.23	42.09	-0.14
34	41.77	41.56	-0.21
35	41.33	40.89	-0.44
36	41.38	40.82	-0.56
37	40.85	40.79	-0.06
38	40.70	40.77	+0.07
39	40.41	40.52	+0.11
40	40.35	40.32	-0.03
40A	40.33	40.25	-0.08

Table 1: Flood levels based on Fairhurst and EL Council flood studies

The updated flood levels using the ISIS model are generally lower across the site, with the exception of downstream of Cascade Weir where flood levels have risen for a distance of 100m. Variations in results are expected between different model platforms. The variations are not outside the expected range.

A short section of natural floodplain exists to the north of the River Tyne before the ground raised steeply on to a raised terrace. As a result the extent of flood inundation in the design event is effectively unchanged between the two assessments. This is in line with the findings of the Fairhurst assessment which concluded that the extent of inundation was not sensitive to variations in the input parameters as a result of the well defined floodplain. The extent of inundation in the two studies can be seen in the attached plans.

Within some areas the flood extent shown on the East Lothian flood study show greater extent of inundation despite the flood levels being shown to be lower. It isn't clear what the reason is for the discrepancy in the flood inundation at these points. In general the variation is less than 5m. The Fairhurst study used ground levels based on photogrammetry data for the floodplain areas to extend the floodplain sections. Reference is made to these changes in the hydraulic model are made in the Council report therefore confirming that the data used for both studies is the same. Flood inundation mapping techniques have however changed since the Fairhurst report was prepared with more accurate digital techniques are now being used. This is therefore likely to be the reason for the minor variations in the extent of flooding shown on the plans.

21<sup>st</sup> July 2010

In summary the findings of the flood assessment carried out by Fairhurst as to the extent of the flood risk at the site are still valid and are supported by the Councils report.

The proposals put forward by Wemyss and March Estate for the residential units to be built on the area identified as being outside the high risk area. This is in line both the guidance set out SPP and previously SPP7 together with the presumption made by SEPA against development within the areas subject to flooding in the 1 in 200 year event. The further work that has been carried out by the council supports the findings of the Fairhurst assessment with regard to the extent of flood risk at the site.

In light of the above can you please confirm that based the site being developed based on a sequential approach with regard to flood risk with higher vulnerability elements such as residential dwellings being limited to the area outside the high flood risk zone next to the River Tyne the Council would no longer object to such a development on flooding grounds.

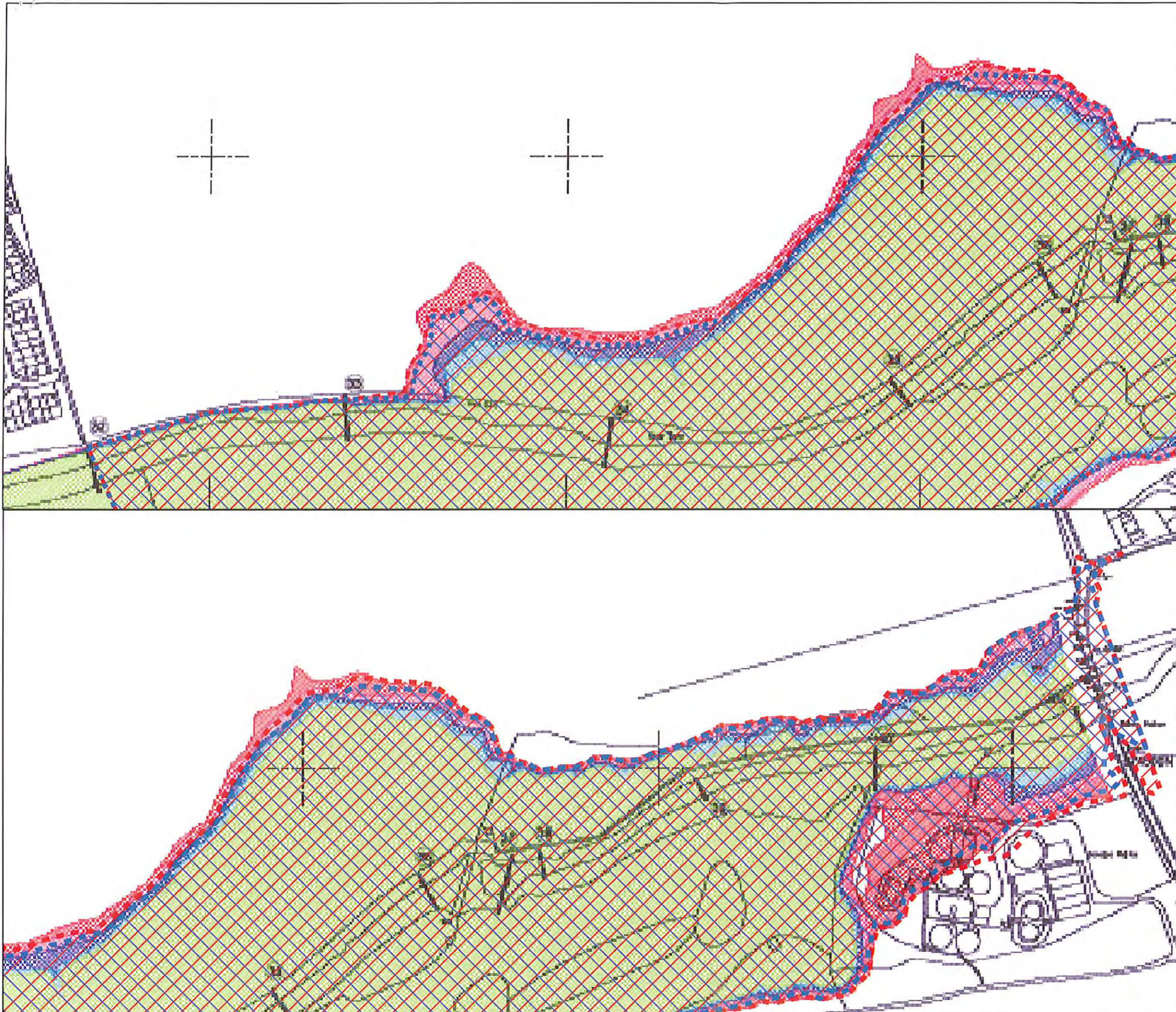
Please confirm the above in writing so that our client Wemyss and March Estate can make an informed decision with regard to assessing their options with the land in question.

Yours faithfully  
**for W. A. Fairhurst & Partners**

Dylan Huws  
Project Engineer

Email [dylan.huws@fairhurst.co.uk](mailto:dylan.huws@fairhurst.co.uk)  
Tel 0131 2256741  
Mob 07917891972





# FAIRHURST



Scale 1:2,500








Project Title:  
**Land East of Haddington**

Drawing Title:  
**Flood Inundation Plan**

Key:

**Legend**  
**Fairhurst Extents**  
**Event**  
 1 in 200 year + climate change flood extent  
 1 in 200 year flood extent

**Extracts from Haddington Flood Study - East Lothian Council**

 4% AEP Flood event  
 2% AEP Flood event  
 1% AEP Flood event  
 0.5% AEP Flood event  
 0.5% AEP + 20% Flood event  
 Cross section location  
 0.5% AEP Flood event - depth of inundation

Client:

Drawn: DH  
 Date: 25/05/10  
 Drawing: 85026/GIS01

43 George St.  
 Edinburgh  
 EH2 2HT

T. 0131 225 6741  
 F. 0131 225 6830

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# Figure 1 - Site Plan (Aerial Photo Context)

LORD WEMYSS  
TRUST



land adjoining amisfield park, haddington

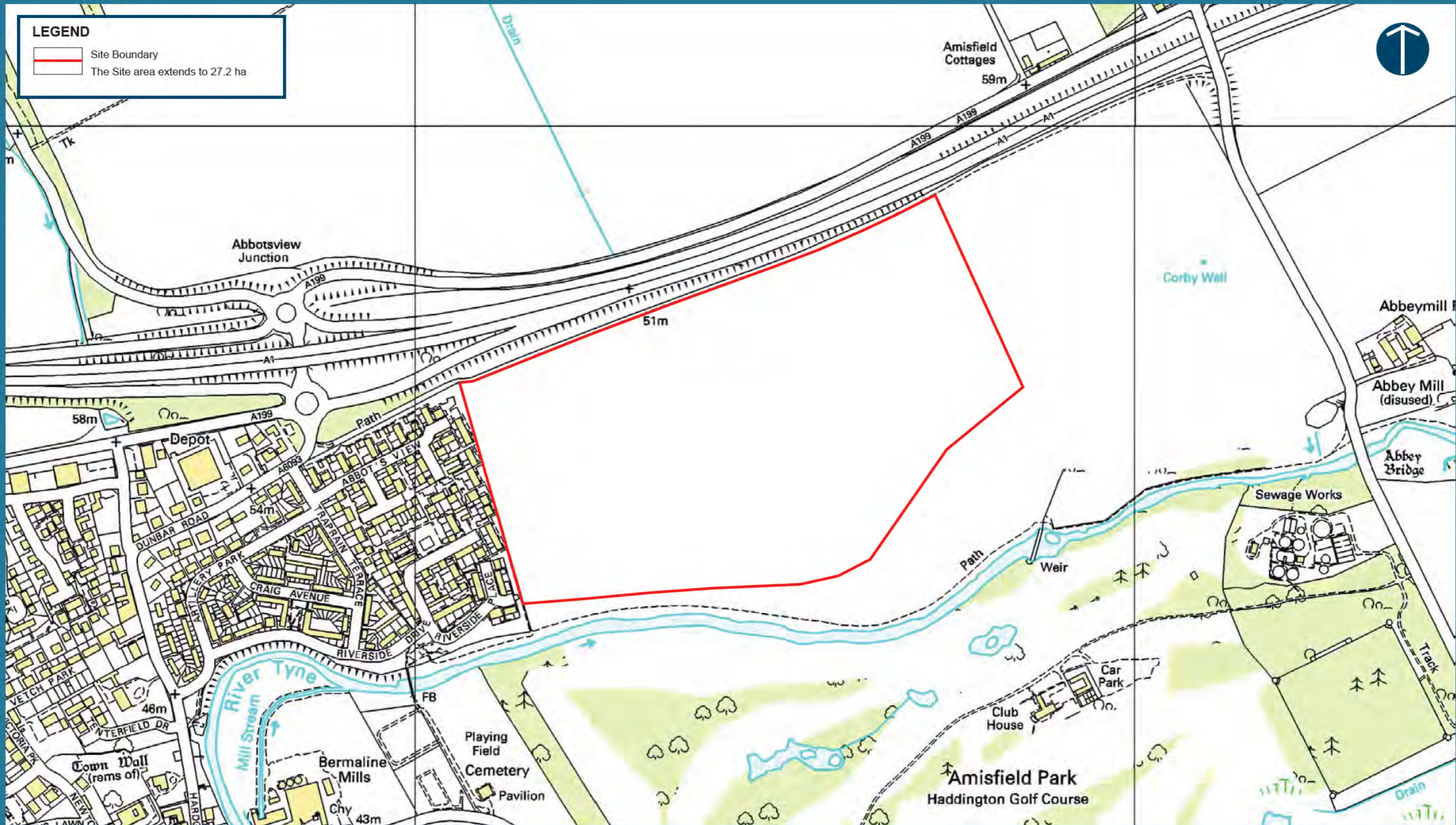
Drawing Reference: SK001 Date: Nov 16 Scale: 1:5,000@A3

FARNINGHAM PLANNING



# Figure 2 - Site Plan

LORD WEMYSS TRUST



land adjoining amisfield park, haddington

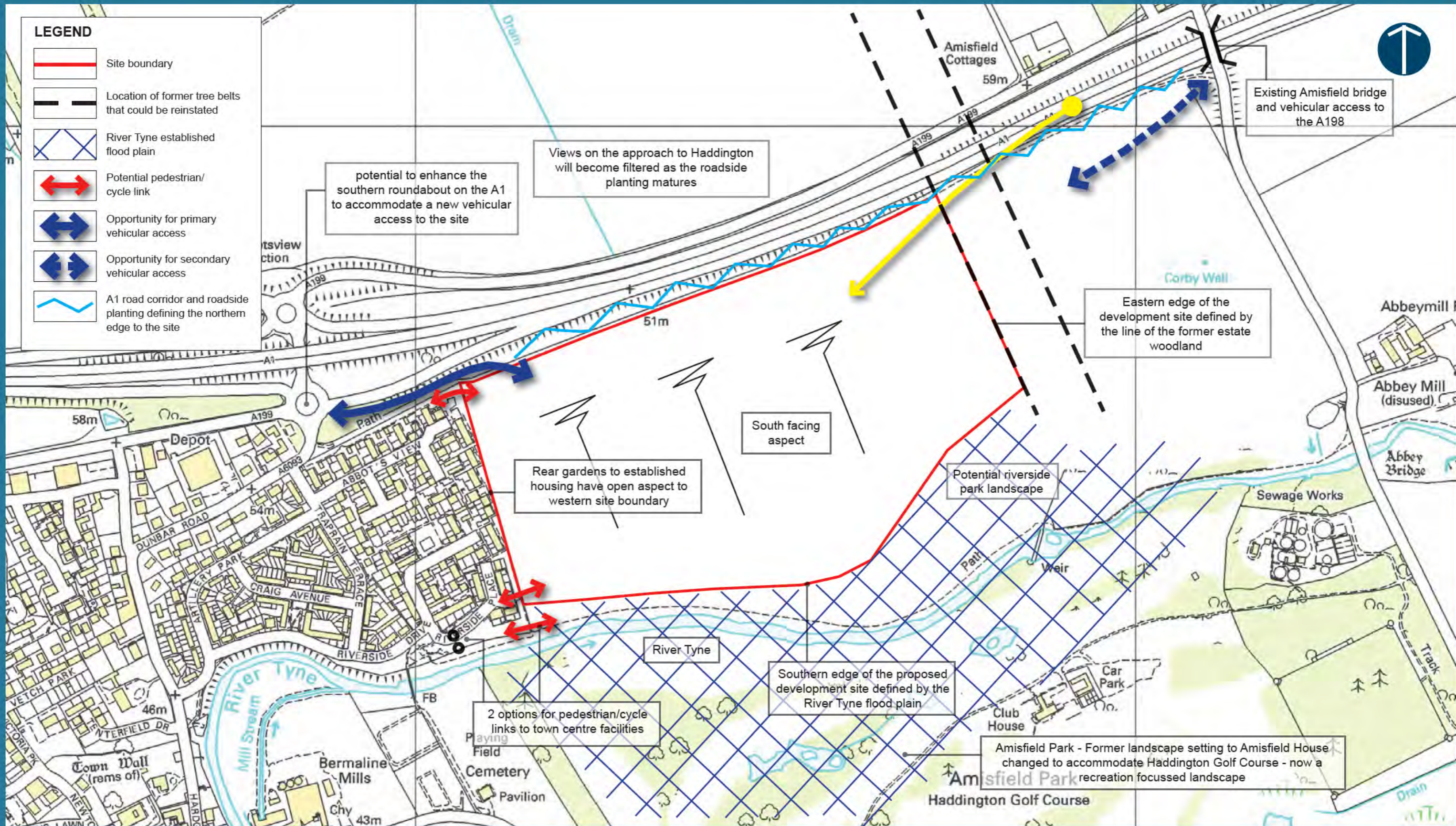
Drawing Reference: SK002 Date: Nov 16 Scale: 1:5,000@A3

FARNINGHAM PLANNING



# Figure 3 - Constraints & Opportunities Plan

LORD WEMYSS TRUST



land adjoining amisfield park, haddington

Drawing Reference: SK003 Date: Nov 16 Scale: 1:5,000@A3

FARNINGHAM PLANNING



**From:** .  
**To:** [Local Development Plan](#)  
**Subject:** Expansion of Gullane - death of a tourist village.  
**Date:** 04 November 2016 17:01:56

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To whom it may concern

The expansion of Gullane at multiple sites, when the fire college site is currently derelict is against all logic and common sense. The scale of the multiple sites in the LDP will cripple Gullane where cars cannot park, pass on the street or move around the village. The access roads to the new sites (especially the c111) are horrifically dangerous, too small and will lead to deaths. As locals to West Fenton we already see that road used as a racetrack and completely out of control vehicles meeting farm tractors on an almost daily basis - there is a crash at least every year. I only assume statistics only  
Provide for crashes where police are called.

I strongly object to the expansion of Gullane as per the LDP. It has no logic to place houses so far from main transport routes.

Andrew Bellamy

**From:**  
**To:** [Local Development Plan](#)  
**Subject:** LDP Objections  
**Date:** 04 November 2016 17:08:57

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Dear Sirs/Madams

As a local resident and working in East Lothian, I would like to submit by objections to the Local Development Plan and ask that the planned development sites of NK7 (Saltcoats) NK8 and NK9 be removed from the LDP. The inclusion of 4 possible development sites in greenfield land adjacent to Gullane village is clearly poor planning and in contradiction to planning legislation which states that brownfield sites should be developed preferentially.

Gullane is a site of historic interest, significant tourism but with very poor transport links and an already struggling infrastructure. As a local I worry that in this era of recruitment and retention crisis the local practice will struggle to cope with the influx of 400 new families. The primary school is almost at capacity.

Most worrying is the road safety. These issues have not been fully assessed or addressed particularly in respect of the proposed Saltcoats development.

Inclusion of 4 proposed sites of development in such a small area is completely disproportionate and as I understand these planning applications have already raised a significant number of objections (over 500).

Yours

Dr Fiona Ferguson





## Scottish Natural Heritage Dualchas Nàdair na h-Alba

All of nature for all of Scotland  
Nàdar air fad airson Alba air fad

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

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

Date: 04 November 2016  
Our ref: CPP142913 / A2108318

Dear Sir/Madam,

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

Thank you for consulting us on the Proposed Plan and its accompanying Strategic Environmental Assessment (SEA). As in earlier iterations, we have provided comment on the SEA in a separate response sent to Scottish Government's SEA Gateway.

We recognise that your preferred means of comment is via your Consultation website. We have completed the relevant sections of the Consultation website. In addition, our representations on the policies and proposals relevant to our remit are appended in Annex 1 of this letter and our advice on the Action Programme and draft Supplementary Guidance is included at Annex 2.

### **Habitats Regulations Appraisal**

The caveats for international designated sites and protected species in policies and proposals are clearly presented and should leave no doubt as to what is required to successfully develop a site. **At this stage, we consider the Proposed Plan meets the requirements of the Habitats Regulations.** Our detailed comments on the draft HRA Record are included in Annex 2 of this response.

If you would like to discuss any of the matters raised in this response, please contact our planning advisor Vivienne Gray ([viv.gray@snh.gov.uk](mailto:viv.gray@snh.gov.uk); 0131 316 2644) in the first instance.

Yours sincerely

[by email]

Niall Corbet  
Operations Manager  
Forth & South Scotland

Scottish Natural Heritage, Silvan House, 3rd Floor East, 231 Corstorphine Road, Edinburgh. EH12 7AT  
Tel. 0131 316 2600 Fax 0131 312 2690 [www.snh.gov.uk](http://www.snh.gov.uk)

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Fòn: 0131 316 2600 Facs: 0131 312 2690 [www.snh.gov.uk](http://www.snh.gov.uk)

## Annex 1 – SNH representation on Proposed Plan

Proposed Plan section/policy/proposal	Representation	Justification
<b>Spatial strategy – main development proposals (pages 17 to 56)</b>	Policies and proposals in this section should include a clear hook to the draft Development Briefs Supplementary Guidance (parts 1 and 2).	At present, policies and proposals require preparation of “ <i>a comprehensive masterplan that conforms to relevant Development Brief</i> ”. The status of these development briefs is unclear. As the draft Supplementary Guidance will have an important role in securing natural heritage safeguards and enhancements, the LDP must provide “ <i>sufficient hook</i> ” <sup>1</sup> to give it the required statutory weight. We are concerned that as currently drafted, the position of the development briefs as part of the plan is not sufficiently clear, increasing the risk of loss or damage to the area’s natural heritage assets.
<b>PROP MH10: Land at Dolphingstone (page 20)</b>	In terms of natural heritage impacts we consider that other alternative sites put forward at the MIR stage would have fewer impacts.	We have expressed concern regarding potential allocation of this site throughout the plan preparation process.  While PROP MH10 requires mitigation of development related impacts and a careful approach to placemaking, we consider that the mitigation of landscape impacts, including avoidance of the loss of important views to Edinburgh, the Forth Estuary and Fife will be very difficult to achieve, even with close adherence to matters set out in the Proposed Draft Development Brief for this site.
<b>PROP DR5: Land at Newtonlees, Dunbar (page 47)</b>	In terms of natural heritage impacts we consider that other alternative sites put forward at the MIR stage would have fewer impacts.	We have expressed concern regarding potential allocation of this site throughout the plan preparation process.  We consider that this site could impact adversely on the distinctive and well-defined landscape setting of Dunbar. While we consider these effects

<sup>1</sup> Paragraph 138, Circular 6/2013.

Proposed Plan section/policy/proposal	Representation	Justification
		will be difficult to mitigate, we advise that partial mitigation could be achieved if this site was subject to a Site Development Brief that sets out key principles for the development in relation to landscape, views and placemaking.
<b>PROP NK4: Land at Tantallon Road, North Berwick (page 53)</b>	In terms of natural heritage impacts we consider that other alternative sites put forward at the MIR stage would have fewer impacts.	<p>We have expressed concern regarding potential allocation of this site throughout the plan preparation process.</p> <p>We consider that full development of this site, particularly on the sensitive upper reaches of the site, will intrude adversely on the important landscape setting of North Berwick Law. If this site is to be retained we consider these impacts could be reduced through the production of a Site Development Brief which retains upper areas of the site as landscaping or open space.</p>
<b>Policy TOUR1: Archerfield Estate, Dirleton (page 63)</b>	We welcome the clear caveat for the adjacent Firth of Forth Special Protection Area (SPA) and the restriction on further infill housing within the Estate.	Further infill development within Archerfield Estate, particularly at Marine Villa, is likely to have a significant effect on the Firth of Forth SPA. These effects may be both direct and indirect. The restriction on further infill development therefore ensures that the Proposed Plan fulfils the requirements of the Habitats Regulations. The restriction also maintains the setting of the existing development within the Estate.
<b>Proposal T3: Segregated Active Travel Corridor (page 90)</b>	<p>We welcome and support the development of a new segregated active travel corridor within East Lothian.</p> <p>In the absence of further detail, we note at this point that the finalised route is unlikely to require HRA beyond screening stage. This caveat may not be required.</p>	The indicative route in the Proposals Map shows that the segregated active travel corridor will play an important role in East Lothian's contribution to meeting the vision of 10% of all journeys being made by bike. The proposed route links settlements and public transport hubs, facilitating choice in travel, including walking and cycling. We also consider this proposal will positively enable people to access and enjoy the outdoors and the natural heritage of East Lothian.

Proposed Plan section/policy/proposal	Representation	Justification
		The indicative route for Proposal T3 as shown on Inset Map 3 places it within existing transport corridors. This, coupled with the limited land-take required to deliver the segregated active travel route, raises doubt over the need for HRA of this proposal. If subject to HRA, we consider it unlikely to require consideration beyond screening stage. We are happy to advise further as required.
<b>Policy T4: Active Travel Routes and Core Paths as part of the Green Network Strategy (page 90)</b>	We welcome the policy approach of protecting the existing core path and active travel networks. However, in support of delivering Proposals T3 and T5, Policy T4 should extend the network as well as maintain it:  <i>The Council will protect its existing core path and active travel network and ensure that new development <b>extends and</b> does not undermine them, including the convenience, safety and enjoyment of their use.</i>	As currently drafted, extensions to the overall active travel and recreation network are specific to particular Proposals.  We therefore consider that Policy T4 should support extension/enhancement of the network beyond these specific Proposals if East Lothian is to continue to contribute towards well-designed, sustainable places <sup>2</sup> .
<b>PROP T5: Cycle Route Network (page 91)</b>	We welcome and support the proposal to continue to develop and enhance the cycle route network as part of a Cycling Strategy and East Lothian's Green Network.	
<b>Policy T6: Reallocation of Road Space and Pedestrian Crossing Points (page 91)</b>	We welcome and support Policy T6. However, due to the strong links to PROP T3 we suggest that it is referenced in Policy T6.	The segregated active travel corridor identified in PROP T3 is likely to require reallocation of road space if it is to be effective. We therefore consider it appropriate and necessary for Policy T6 to include reference to PROP T3.
<b>PROP T10: Safeguarding Land for Platform Lengthening (page 92)</b>	Remove reference to need for HRA.	The nature and location of the platform lengthening works means that connectivity to the Firth of Forth SPA is not likely. To ensure that the Proposed Plan is proportionate, we do not consider this caveat to be required for PROP T10.

<sup>2</sup> [National Outcome 10](#) – We live in well-designed, sustainable places where we are able to access the amenities and services we need.

Proposed Plan section/policy/proposal	Representation	Justification
<b>Policy SEH1: Sustainable Energy and Heat (page 102)</b>	To note that district heat networks “ <i>could co-exist satisfactorily with existing or proposed uses in the area</i> ” where these uses include green networks.	Co-location of heat networks and green networks may be an effective way to deliver infrastructure. We look forward to the opportunity to advise further either through consultation on supplementary guidance or review of the LDP, as discussed at paragraph 4.71 of the Proposed Plan.
<b>Policy WD1: Wind Farms (page 103)</b>	Support.	We note and support the content of Policy WD1 and the supporting Technical Note 4.
<b>Policy WD2: Smaller Scale Wind Turbine Development (page 103)</b>	Support.	
<b>Policy WD3: All Wind Turbines (page 106)</b>	Support.	
<b>Policy WD4: Access Tracks (page 107)</b>	Amend policy to include ancillary development such as crane pads, grid connections and energy storage.	<p>Ancillary development is a key component of wind farms and we consider it is not fully addressed in either policy or supporting text at present.</p> <p>With minor modification, Policy WD4 could also usefully cover other non- turbine ancillary aspects of wind farm development that may have significant environmental effects: such as construction compounds, borrow pits, crane pads, substation, cables and connections. This may allow fuller definition between and linkage to, Policy WD3.</p> <p>We are aware of growing interest and applications for energy storage proposals, including on site within wind energy projects. Policy reference to energy storage infrastructure could be usefully accommodated within a modified Policy WD4.</p>
<b>Policy WD5: Re-powering (page 107)</b>	Amend to allow scope within Policy WD5 to develop further planning guidance on repowering.	Given the age of certain wind energy developments within and adjacent to East Lothian, we highlight the potential within the plan period for repowering to become a key issue. It may therefore be pragmatic to allow scope within Policy WD5 to develop further planning guidance

Proposed Plan section/policy/proposal	Representation	Justification
		on repowering, potentially through joint working with neighbouring Local Authorities on the two strategically important cross boundary development clusters (1.Aikengall/ Crystal Rig phases; 2; Dun Law/ Pogbie/ Keith Hill).
<b>PROP EGT1: Land at former Cockenzie Power Station (page 108)</b>	We note and welcome the redrafting of the Proposal to include a Natura caveat.  We note and welcome the intention to prepare Supplementary Guidance.	The future use of the site of Cockenzie Power Station remains uncertain. In that context, we consider it appropriate for the Proposed Plan to highlight the need for HRA and to propose that further detail on use of the site is set out in Supplementary Guidance. We will engage in both processes as required.
<b>PROP EGT3: Forth Coast Area of Co-ordinated Action (page 109)</b>	We note that the Proposal has been updated to include a Natura caveat. As the current wording appears to pre-suppose that there will be a likely significant effect, this caveat should be re-drafted:  <i>Proposals must be accompanied by project specific information to inform a Habitats Regulations Appraisal and, if necessary, an Appropriate Assessment under the Habitats Regulations.</i>  The supporting text at paragraph 4.97 requires a change of tense to communicate that two developments are consented.	In general, we welcome the clear expression of what East Lothian Council require in relation to grid connections for offshore wind energy. However, the supporting text for this Proposal requires review as it currently reads as though something <u>may</u> come forward when two developments are already consented here.  The current Natura caveat prejudices a positive screening result for likely significant effect. To allow the assessment process to run its course, the caveat should be reworded to refer to the HRA process as a whole rather than the latter stages.
<b>PROP MIN4: Safeguard Bangley and Markle Mains Hard Rock Quarries (page 113)</b>	There is no recognition in either PROP MIN4 or the supporting text that part of Bangley Quarry is a Site of Special Scientific Interest (SSSI). This should be added to the Proposal to ensure that reopening of the site does not conflict with management of the SSSI.	Our objectives for management of the SSSI include maintaining access to geological features and avoiding damage by quarrying operations. We therefore recommend that PROP MIN4 should set out requirements to minimise impacts on the SSSI that proposals for Bangley Quarry will need to address in order to be acceptable.
<b>Spatial Strategy Diagram 5: Countryside and Coast (page 119)</b>	Review extent of “constrained and developed coast” shown in diagram 5.	The diagram should: <ul style="list-style-type: none"> <li>• Separate out the different categories of</li> </ul>

Proposed Plan section/policy/proposal	Representation	Justification
		<p>'constrained' and 'developed' coast to align with Policy DC6: Development in the Coastal Area;</p> <ul style="list-style-type: none"> <li>• Be updated to accurately reflect the extent of unspoiled coast.</li> </ul>
<p><b>Policy DC4: New Build Housing in the Countryside (page 121)</b></p>	<p>Policy refers only to support “<i>outwith the constrained coast</i>”. This caveat appears unnecessary.</p>	<p>Policy DC6 sets out constraints and requirements in relation to the coast. Policy DC4 should therefore refer to that policy in caveat (iii) rather than emphasise one particular definition of countryside and coast.</p>
<p><b>Policy DC6: Development in the Coastal Area (page 122)</b></p>	<p>Policy should be amended to refer to “<i>Unspoiled Coast</i>” rather than “<i>Largely Unspoiled Coast</i>”.</p> <p>Policy DC6 has a more comprehensive Natura caveat than other policies and it is unclear why this detail is required in this particular case. To align with other Policy caveats, we recommend it is amended to:</p> <p><i>Proposals must be accompanied by project specific information to inform a Habitats Regulations Appraisal and, if necessary, an Appropriate Assessment under the Habitats Regulations.</i></p>	<p>The term “<i>Largely Unspoiled Coast</i>” used in Policy DC6 does not appear elsewhere in the Proposed Plan or Technical Note 7. We recommend it is changed to “<i>Unspoiled Coast</i>” to ensure clarity and consistency throughout the Proposed Plan and supporting documents.</p> <p>The Natura caveat used in Policy DC6 represents good practice. However, it does not align with caveats used elsewhere in the Proposed Plan. As the full caveat is used in Policy NH1 we suggest that the shorter caveat used in other Policies would be sufficient in Policy DC6.</p>
<p><b>Policy DC8: Countryside Around Towns (page 123)</b></p>	<p>Support.</p>	
<p><b>Policy DC10: The Green Network (page 124)</b></p>	<p>The Policy seeks to secure provision of green network measures through development briefs and proposed Green Network Strategy supplementary guidance.</p> <p>It should be made clear that green infrastructure contributions are included in the draft Developer Contributions supplementary guidance. A hook to the Developer Contributions supplementary guidance should be included.</p>	<p>As a key infrastructure type, we consider green network provision should be treated in the same manner as other infrastructure types.</p>
<p><b>Biodiversity and Geodiversity (page 125)</b></p>	<p>Remove reference to “<i>candidate Marine Special</i></p>	<p>The Firth of Forth Banks Complex is solely a</p>

Proposed Plan section/policy/proposal	Representation	Justification
	<p><i>Area of Conservation</i>” in relation to Firth of Forth Banks Complex and update reference to Outer Firth of Forth and St Andrews Bay Complex draft SPA in paragraph 6.7 so that it reads:</p> <p><i>“Offshore, the Firth of Forth Banks Complex is a Nature Conservation Marine Protected Area (MPA). The Outer Firth of Forth and St Andrews Bay Complex is a marine proposed SPA.”</i></p>	<p>Nature Conservation MPA.</p> <p>Since the Proposed Plan was drafted and published the Outer Firth of Forth and St Andrews Bay Complex has moved from draft to proposed SPA.</p>
<p><b>Policy NH1: Protection of Internationally Designated Sites (page 126)</b></p>	<p>Support.</p>	
<p><b>Policy NH2: Protection of Sites of Special Scientific Interest and Geological Conservation Review Sites (page 126)</b></p>	<p>Support.</p>	
<p><b>Policy NH3: Protection of Local Sites and Areas (page 126)</b></p>	<p>Remove reference to <i>“The following sites”</i> as no sites are listed.</p> <p>Amend reference to <i>“associated technical note”</i> to <i>“Planning for Biodiversity Technical Note”</i>.</p>	<p>Policy NH3 would be overly long if sites were listed. We suggest this reference is removed as the Proposals Map and Technical Note 10 provide detail.</p> <p>As the Proposed Plan has several supporting Technical Notes, a specific reference to the Planning for Biodiversity Technical Note is more helpful to readers.</p>
<p><b>Policy NH4: European Protected Species (page 127)</b></p>	<p>Support.</p> <p>Recommend that supporting text at paragraph 6.13 includes reference to licensing requirements.</p>	<p>To support proportionate approach to delivering development, the need for a derogation licence for EPS under the Conservation (Natural Habitats &amp;c.) Regulations 1997 (as amended) should be made clear.</p>
<p><b>Policy NH5: Biodiversity and Geodiversity Interests, including Nationally Protected Species (page 127)</b></p>	<p>Support.</p> <p>Recommend that supporting text at paragraph 6.13 includes reference to licensing requirements.</p>	<p>To support proportionate approach to delivering development, the need for a derogation licence for species protected under the Wildlife &amp; Countryside Act 1981 (as amended) should be made clear.</p>
<p><b>Policy NH6: Geodiversity Recording and Alternative Exposures (page 127)</b></p>	<p>Support.</p>	
<p><b>Policy NH7: Protecting Soils (page 128)</b></p>	<p>Support.</p>	



Proposed Plan section/policy/proposal	Representation	Justification
<b>Policy NH8: Trees and Development (page 129)</b>	Support.	We welcome the clear policy caveat on loss of ancient woodland and the overall policy approach of protecting the woodland resource of East Lothian.
<b>Policy NH10: Sustainable Drainage Systems (page 130)</b>	Support, however, we recommend that the final sentence of Policy NH10 is altered to read:  <i>Proposals must also demonstrate through a design-led approach how SuDS proposals are appropriate to place and designed to promote wider benefits such as placemaking, green networks and biodiversity enhancement.</i>	We welcome the recognition of the role of SuDS in placemaking, green networks and biodiversity enhancement. As green infrastructure, we highlight SPP paragraph 225: that SuDS proposals should be delivered through a design-led approach that results in a proposal that is appropriate to place.
<b>Policy DP2: Design (page 138)</b>	We recommend Policy DP2, bullet 4 is altered to read:  <i>Provide a well connected network of paths and roads within the site that are direct and will connect with existing networks <b>both on- and off-site</b>, including green networks, in the wider area ensuring access for all the community, favouring, <del>where appropriate</del>, active travel and public transport then cars as forms of movement.</i>	Policy should more explicitly align with the SPP transport mode hierarchy and the policy principles of Designing Streets.
<b>Policy DP9: Development Briefs (page 141)</b>	In general we support this policy, but for clarity, it should be made clear that the briefs within the <i>Draft Development Briefs Supplementary Planning Guidance Parts 1 and 2</i> , will form adopted briefs when finalised.	We welcome this policy and the development principles established both in the policy and set out in the related draft supplementary guidance. Nevertheless, some sites have natural heritage impacts that we consider will be difficult to mitigate. We have highlighted above the sites which are of greatest concern to SNH.

## Annex 2 – Action Programme, Supplementary Guidance and other documents

Document section	Comments
<b>Habitats Regulations Appraisal</b>	
<b>Approach (pages 3 to 10)</b>	<p>This section is a generally useful and thorough explanation of the iterative process followed in the Habitats Regulations Appraisal (HRA).</p> <p>We note that paragraph 2.15 specifies that the screening process has been undertaken in line with the Waddenzee ruling<sup>3</sup>. It is helpful to see this explicitly referenced. It is also useful to see the screening criteria laid out clearly at paragraphs 2.29 – 2.34, contributing to the generally transparent approach of this report.</p>
<b>Results/conclusions of screening (pages 10 to 15)</b>	<p>This section, alongside Appendix B, establishes a clear and transparent audit trail of decisions and amendments to the Proposed Plan policy text.</p> <p>Explicit reference is made to Policy EGT1 (Cockenzie Power Station) in paragraphs 3.9 and 3.13, thereby screening out two Natura sites. However, other Natura sites are screened out without this audit trail at paragraphs 3.11-12 and 3.14-15. There appears to be a lack of consistency here as our advice has been that Isle of May Special Area of Conservation (SAC), Firth of Tay and Eden Estuary SAC, Moray Firth SAC and Outer Firth of Forth and St Andrews Bay Complex proposed (Special Protection Area) have connectivity with the Cockenzie site.</p> <p>The conclusions set out in Table 3.1 are reasonable; however, we consider that the explanation behind some of them could be more explicit. In the context of plan preparation and review timescales, it is important that HRA Records establish a clear audit trail so that the basis for decisions is clear to subsequent plan-makers.</p>
<b>Appropriate Assessment in relation to Firth of Forth SPA (pages 15 to 36)</b>	<p>The analysis of proposals is based on the best available information available at the time of the HRA.</p> <p>Under <u>increased recreational disturbance at the coast from housing</u> (paragraphs 4.1 to 4.30), in the context of recent discussions on survey work in support of the LDP, paragraph 4.9 contains the key point “<i>there does not appear to be a linear relationship between the housing stock in East Lothian and levels of recreational use of the coast</i>”. With this in mind our advice is</p>

<sup>3</sup> <http://www.snh.gov.uk/protecting-scotlands-nature/protected-areas/international-designations/natura-sites/hra-likely-significant-effect/>;  
<http://curia.europa.eu/juris/liste.jsf?language=en&num=C-127/02>

Document section	Comments
	<p>that further consideration of this topic may be better placed outside of the LDP context.</p> <p>Paragraph 4.29 recommends a study of visitor numbers and disturbance levels, and subsequent mitigation. We agree that this is an issue the Council is going to have to address; however, as discussed above we are less certain that the LDP process is the correct context within which to pursue this work.</p> <p>The section on <u>loss of high tide roost sites for waders</u> generally sets out clear arguments in support of the conclusions of no adverse effect on site integrity. However, the conclusions for redshank (paragraph 4.50), lapwing (paragraph 4.65), golden plover (paragraph 4.70) and grey plover (paragraph 4.73) could be clearer. Lapwing and golden plover appear to have no conclusion at all. In the case of redshank and grey plover, we assume that the conclusion is based on the rationale that only coastal tetrads contain higher numbers. Therefore, as allocations are inland, the proposals will have no adverse effect on site integrity. If this is the case, it should be stated more clearly.</p> <p>Discussion of <u>loss or disturbance of pink-footed goose roosts</u> notes several relevant factors – this qualifying interest is in favourable condition, there is a preference for feeding sites north of the A1, ability to use a wide range of crop fields and the impact of disturbance (from roads in particular). This is useful contextual information.</p> <p>There are five proposals identified as likely to disturb pink-footed goose. Of these, PROP PS1 and PROP DR8 are presented as single outlier records and therefore not important feeding areas. We agree with this assessment.</p> <p>PROP NK7, PROP NK8 and PROP NK9 identify a need for HRA at project level. As the competent authority it is for you to decide on the requirements set out in the proposals. However, we highlight at this point that our own position on this, as advised by our ornithologists, is that the extent of work set out is not required.</p>
<b>Appropriate Assessment in relation to Fala Flow and Gladhouse SPAs (pages 36 to 37)</b>	We agree with the conclusion for the plan itself and in-combination with other plans.
<b>Appendix E (pages 62 to 65)</b>	This appendix references the Dirleton Airfield proposal (planning case ref and page ref) as a proposal that was refused. Our understanding is that this

Document section	Comments
	<p>is not correct and that the proposal is proceeding through application and assessment processes once more. This part of the HRA Record will require update.</p>
<p><b>Draft Developer Contributions Framework supplementary guidance</b></p>	
<p><b>Delivering the Spatial Strategy for East Lothian</b></p>	<p>Paragraph 1.22 (page 5) discusses the importance of early clarity on how issues will be addressed in support of development appraisals, proposals and masterplans. As discussed in our representation on Policy DC10 in Annex 1 of this response, we consider this should include green infrastructure as an integral element of successful places and green networks.</p> <p>For example, we consider that by setting the developer contributions for cycling and open space more firmly within a wider context of delivering green infrastructure (in line with the policy principles set out in paragraph 194 of Scottish Planning Policy) that a wider set of benefits could be derived from developer contributions.</p> <p>We have considered the policy tests set out in Circular 3/2012 in giving this advice to you and we believe that developer contributions for active travel and open space in the context of a multi-functional green infrastructure, where such measures are required, meet the 5 tests.</p>
<p><b>Draft Development Briefs supplementary planning guidance</b></p>	
	<p>We welcome the preparation of development briefs for sites to be allocated within the Local Development Plan and the work progressed jointly to date. We are happy to continue to engage with you to help finalise the draft briefs, to take account of feedback received.</p> <p>We see the opportunity for further refinement of the content of the briefs. In relation to our own remit; one such example would be in relation to the use of colour in development. Appropriate guidance on this matter would be beneficial, particularly with respect to larger buildings and business facilities on the edge of settlements and where local landscape character and visual impact issues may suggest the need for further consideration of colour in development. In certain specific circumstances the need for a design led approach to colour co-ordination as a form of mitigation could usefully be set out in the briefs.</p> <p>While we support the preparation of development briefs, as highlighted in Annex 1 of our response there are a number of sites which continue to raise</p>

Document section	Comments
	<p>concerns for us and where we consider it will be difficult to achieve acceptable mitigation of development-related impacts on the natural heritage. In terms of natural heritage impacts we consider that other alternative sites considered at MIR stage would have fewer impacts.</p> <p>Finally, we note that this document is identified as “<i>supplementary planning guidance</i>” in contrast to other consultation documents which are “<i>supplementary guidance</i>”. We assume that this distinction means that the draft Development Briefs guidance are non-statutory and therefore not part of the LDP at present. As a key mechanism for delivering the spatial strategy we consider that, as part of finalising them, the development briefs should be adopted as supplementary guidance.</p>
<b>Action Programme</b>	
<b>General</b>	<p>The Action Programme has Priority Actions and Guidance Actions, which are described in the preamble on page 6. It is not clear how Priority Actions are those that “<i>must be implemented in the short term</i>” as they are shown with short, medium and long timescales. On that basis, it is unclear how actions have been assigned to different tables, particularly as several transport actions are essential to timely delivery of the LDP. There is also overlap between these tables in places, adding further confusion on how these tables should be read alongside each other.</p> <p>The difference in format between the Priority Actions and Guidance Actions is also somewhat confusing and we find the RAG rating<sup>4</sup> used for Priority Actions much clearer than the format used for Guidance Actions.</p>
<b>PROP T3: Segregated Active Travel Corridor (Proposed Plan page 90)</b>	<p>The Council’s commitment to developing a segregated active travel corridor is not reflected in the current version of the Action Programme. As the Action Programme includes short- to long-term actions, this raises concern regarding the actual status of the commitment to this key element of the area’s transport infrastructure.</p> <p>We recommend that this proposal is included in the Action Programme.</p>
<b>Blindwells Development Area Design Framework (page 18)</b>	<p>The current Blindwells allocation and the long-term safeguard represent an area of significant change within which there could be both opportunities and constraints for the natural heritage. Given the extent of change, unseen in this area in recent generations, we consider that the joint working interests</p>

<sup>4</sup> RAG rating – red, amber, green rating

Document section	Comments
	<p>at Blindwells are broader ranging than those listed in this version of the Action Programme.</p> <p>We would welcome being included in certain elements of joint working for this site.</p>
<b>Special Landscape Areas SPG (page 19)</b>	<p>We are identified for joint working on the Special Landscape Areas supplementary guidance. We welcome our proposed role and look forward to working on this with the other partners.</p>
<b>Policy NH9: Water Environment (page 45)</b>	<p>We are unclear on the reason for our inclusion against this action. While we have an interest in the water environment where it supports delivery of our remit, SEPA are the lead agency for WFD and WEWS and related policy requirements.</p>
<b>Policy NH11: Flood Risk (page 46)</b>	<p>Please see our comments on actions for Policy NH9 above.</p>
<b>Policy CH9: High Street/Inch View, Prestonpans (page 50)</b>	<p>We assume that we are identified as a joint lead here as Policy CH9 includes a Natura caveat. We will provide advice on HRA in the normal manner and do not consider that there is a requirement for the Action Programme to identify us as a joint lead.</p>

## Wallace Land Investments – Representations to Proposed Plan Representation about Fenton Barns

### 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

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

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

*Modifications(s) Sought:*

The Council supports a significant scale of mixed use development at Drem. However, the Council continues to ignore the potential of encouraging further economic and speciality retail development at Fenton Barns.

Accordingly, Wallace Land Investments proposes that Fenton Barns is designated as a settlement.

Wallace recognise that the Council has noted Drem as a location for future growth. Fenton Barns has an important role to play as a local business and employment generator, which can be enhanced via a mixed use development of up to 1,000 homes at Fenton Barns to generate capital to enable the creation of further business units and speciality retailing.

Further text should be added to after paragraph 2.154 of the Proposed Plan:

*This should recognise that Fenton Barns has a role to play as a mixed use location, and that residential led development at Fenton Barns could lead to investment in the creation of further small businesses and speciality retailing, together with a primary school, open space and landscaping etc.*

Furthermore, given the scale of housing shortfall identified in the *Assessment of Housing Supply*, it is proposed that land at Fenton Barns as shown in the *Development Framework Report* should be allocated for a mixed use development at Fenton Barns.

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

*Justification for Modification(s):*

**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.

The *Development Framework Report* submitted as part of this representation explains in more detail (section 9) the case for designating the area known as Fenton Barns as a settlement. Section 9 also shows the settlement area to designate as well as the settlement boundary.

**Identifying Fenton Barns along with Drem as an area for longer term growth**

The Council's longer term development strategy includes the potential for growth at Drem. This is explained in paragraph 2.154, as follows:

*Drem is within the SDA and benefits from a railway station on the East Coast Main Line, but this is served only by local train services. It also has very limited public transport accessibility by other modes, and very limited facilities. The local road network at Drem is inadequate for significant growth. However, in the long term, a significant scale of mixed use development here may present an opportunity for road realignment and the relocation of Drem station. Primary education solutions would be required together with additional campus land at North Berwick High School.*

Wallace Land Investments recognises the potential for further mixed use development in this general location but wishes to highlight the opportunity presented by Fenton Barns as a sustainable mixed use settlement.

Fenton Barns is already an established employment centre within the North Berwick Cluster with over 500 full and part time jobs. It has brownfield as well as greenfield land capable of further development for industrial accommodation or speciality retailing, enabled by housing development to create a sustainable mixed use settlement.

The scope of future economic development is substantial. This is set out in the Report: *Fenton Barns – Realising its Economic Potential*, submitted as part of this representation.

The scale of growth which could be accommodated at Fenton Barns is set out in the *Development Framework Report* submitted in support of this representation.

The proposal for around 1,000 private and affordable homes, a new community primary school, and



associated facilities and infrastructure. Set within a robust landscape context and greenspace framework, it will build upon existing employment and amenities to form a sustainable community. The creation of a village from existing developments will deliver key infrastructure, most notably the delivery of an upgraded foul drainage system replacing the existing private treatment works which businesses depend on. This out dated drainage system does not meet legislative requirements and current business requirements.

To ensure that the proposal is socially inclusive, 25% of the new homes will be affordable housing. Up to 250 affordable homes will be built along with the private homes. The full range of affordable housing tenures can be delivered – social rented, intermediate homes and entry level homes for sale.

The land is within a single ownership and this is an important consideration in funding infrastructure. Wallace Land Investments is committed to delivering the necessary infrastructure including the improved drainage system, new community primary school and any further expansion of the local secondary school. As required by the Council, financial contributions to off site road improvements, public transport improvements, and public realm will be taken into account in the delivery of infrastructure for this proposal. The required new primary school would be community based, enabling lifelong learning and sports facilities. This new primary school will be built in phases with the first phase (for a short period) based in temporary accommodation in Gullane Primary School.

The new village will have a robust landscape framework. This will create a series of wildlife corridors, play areas and core path network with views and links to East Lothian’s countryside.

Creating a new village, based on the economic activities already established at Fenton Barns, will help to minimise impacts on surrounding communities from further housing development and provides for a sustainable community.

The Proposed Plan (paragraph 2.154) refers to the potential for further longer term development at Drem - *However, in the long term, a significant scale of mixed use development here may present an opportunity for road realignment and the relocation of Drem station.*

In addition, for the reasons set out in the *Development Framework Report* supporting this representation, Fenton Barns and its locality should be included with Drem as a location for further development in the long term.

Further text should be added to after paragraph 2.154 of the Proposed Plan:

*This should recognise that Fenton Barns has a role to play as a mixed use location, and that residential led development at Fenton Barns could lead to investment in the creation of further small businesses and speciality retailing, together with a primary school, open space and landscaping etc.*

### **Allocating land at Fenton Barns as a mixed used development**

The *Development framework Report* highlights the potential realise a major mixed use development at Fenton Barns.

The proposed new settlement at Fenton Barns is located in the East Lothian SDA. This accords with the development strategy in SESplan.

This new settlement is also in accord with the requirements set by Scottish Ministers in the National Planning Framework to help deliver more housing in the SESplan area.

Although SESplan does specifically promote a new settlement to meet the housing land target for East Lothian at Blindwells, the allocation of a further new settlement at Fenton Barns has a key role to play in delivery of the spatial strategy and future rural economic development in this part of rural East Lothian, as required by SPP.

A new settlement at this scale of up to 1,000 homes can deliver necessary infrastructure cost effectively. Additional housing at Fenton Barns will reduce pressure to release Green Belt land elsewhere in East

Lothian or greenfield land adjacent to settlements in the west sector of the East Lothian that are already at their environmental capacity.

The site will provide a full range of local facilities commensurate with a settlement of its size of up to 1,000 homes, as well as shops, employment and commercial uses. This will build upon the existing residential and commercial mix already in place. New facilities, including a new primary school, will be provided and phased with development.

The additional allocation sought is highlighted in section 9 of the Development Framework Report.

### 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:*

Wallace Land Investments has commissioned an *Assessment of the Housing Land Supply*.

This Assessment calculates the Housing Land Requirement to be met in the Proposed Plan, taking account of the Housing Supply Target set by SESplan.

The Housing Land Requirement has then been compared with the effective housing land supply. This effective housing land supply includes completions from the Established Housing Land Supply as well as the proposed allocations.

The conclusion from this Assessment is that there is a significant shortfall of homes in the period to 2019. Accordingly, it is recommended that the Council, in formulating its Schedule 4s for the Examination, allocates additional land to meet this short term requirement.

*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):*

Please refer to the *Assessment of the Housing Land Supply* submitted in support of this representation.

*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:*

Please refer to the *Assessment of the Housing Land Supply* submitted in support of this representation. Table HOU2: *Housing Land Requirements and Supply* should be modified as set out in this Assessment.

*2b. Please give any information/reasons in support of each modification suggested to the Established*

<p><i>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.</i></p> <p><i>Justification for Modification(s):</i></p>
<p>Please refer to the <i>Assessment of the Housing Land Supply</i> submitted in support of this representation.</p>
<p><i>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.</i></p> <p><i>Modifications(s) Sought:</i></p>
<p>Please refer to the <i>Assessment of the Housing Land Supply</i> submitted in support of this representation.</p>
<p><i>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.</i></p> <p><i>Justification for Modification(s):</i></p>
<p>Please refer to the <i>Assessment of the Housing Land Supply</i> submitted in support of this representation.</p>

<p><b>Proposals Map</b></p>
<p><i>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.</i></p> <p><i>Modifications(s) Sought:</i></p>
<p>A new Inset Plan is required for Fenton Barns which is designated as a settlement. The minimum area to be designated as a settlement is shown on the plan (section 9 of the Development Framework Report) excluding any new residential land proposed to be allocated.</p> <p>If the Council agrees that it needs to allocate further land to meet an identified housing shortfall in the development strategy to meet SESplan's housing land target (as explained in the <i>Assessment of Housing Land Supply</i>), then further residential land should be allocated at Fenton Barns as shown on the plan (section 9 of the Development Framework Report).</p>
<p><i>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.</i></p> <p><i>Justification for Modification(s):</i></p>
<p>The modifications to the LDP Proposal Map are justified for the reasons explained above.</p>

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**Fenton Barns**  
**Realising its Economic Potential**

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**On behalf of**



**October 2016**

Prepared by :



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## Document Control and Approval

Revision	Status	Prepared	Approved	Date
V1	Draft for Comment	Phil McLean	Bob Salter	28 <sup>th</sup> April 2016
V2	Final	Phil McLean	Bob Salter	19 <sup>th</sup> May 2016
V3	Final	Shaun Doherty	Bob Salter	31 <sup>th</sup> October 2016

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## Contents

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<b>1.0</b>	<b>Introduction</b>	<b>1</b>
<b>2.0</b>	<b>Fenton Barns' contribution to East Lothian's economy</b>	<b>4</b>
<b>3.0</b>	<b>Potential for economic expansion</b>	<b>6</b>
<b>4.0</b>	<b>Realising Fenton Barns' economic potential</b>	<b>11</b>
<b>Annex 1:</b>	<b>Economic Benefits Summary Statement</b>	
<b>Annex 2:</b>	<b>Figures</b>	
<b>Annex 3:</b>	<b>Survey Form</b>	
<b>Annex 4:</b>	<b>Accommodation Schedule</b>	

## 1.0 Introduction

- 1.1. This Report has been commissioned by Wallace Land Investments (Wallace). It has been prepared to demonstrate the contribution which the land and buildings at Fenton Barns make to the local economy of East Lothian and, in particular, the role played by DC Watson & Sons (Fenton Barns) Ltd (DC Watson) in supporting the rural economy around North Berwick.
- 1.2. Wallace has already commissioned an assessment of the Economic Benefits in support of the proposal for a new settlement at Fenton Barns. This was undertaken by Turley Economics. It is included in Annex 1. It confirms that Fenton Barns already supports 500 employees or 375 Full Time Equivalent (FTE) jobs directly on-site, approximately £27.2 million Gross value Added (GVA), and approximately £8.5 million in salaries.
- 1.3. DC Watson has built up a portfolio of 93 properties at Fenton Barns which meet the needs of local businesses. These properties provide a range of business requirements from storage space to manufacturing premises to serviced offices to specialist retailing. There is an ongoing and strong demand to rent these premises. In addition, there are 7 other businesses located at Fenton Barns – Stuart Motors, Drem Timber, Robbie Reid Furniture, Andrew Black, Browns Food Group, and Monaghan Mushrooms.
- 1.4. Fenton Barns is the largest area of active development in East Lothian which is not designated as part of a settlement in the adopted East Lothian Local Plan 2008. Designation of Fenton Barns as a settlement would both help and control the delivery of new development at this location.

### **Need for further investment**

- 1.5. Fenton Barns is currently served by a private foul drainage system. This was established when the site was under the control of the War Office during the Second World War. This private sewage treatment works is no longer fit for purpose. It continually fails to meet the rising discharge standards imposed by SEPA's license. The combined system in place (foul and surface water) is unable to deal with flows in times of heavy rainfall. It discharges into the Peffer Burn and impacts on water quality downstream at Aberlady Bay.
- 1.6. A new foul and surface water drainage system has been previously approved by the Council under planning permission 09/00054/FUL. The proposed foul drainage system would involve foul water being discharged into existing public drainage infrastructure and ultimately into the existing waste water treatment works at Gullane. It would involve a new waste water pumping station. SEPA is supportive of these proposed works. DC Watson does not have the funding to deliver this upgrade.
- 1.7. DC Watson has endeavoured to maintain the treatment works and the associated pipework but it is no longer suitable or reliable. A modern and effective drainage system is required to ensure the continued future of Fenton Barns as an area of employment, and to allow it to expand to meet its known economic potential.

### **East Lothian Economic Development Strategy 2012-2022**

- 1.8. The East Lothian *Economic Development Strategy 2012-2022* seeks to identify the opportunities East Lothian can exploit to maximise its sustainable economic competitiveness.
- 1.9. The strategic goals of the Strategy are to increase the number of businesses in East Lothian with growth potential, and to increase the proportion of East Lothian residents working in and contributing to East Lothian's economy.

- 1.10. The aim is to create an additional 7,500 jobs by 2022, and an additional 350 business. New jobs should come from both growth of existing business, and new business starts and inward investment. Food and drink is recognised as one of the sectoral strengths of East Lothian with potential for further development.
- 1.11. Key weaknesses of the East Lothian economy have been identified in the Strategy (pages 14-15). These include:
- *...Mismatch in available business premises, with limited supply where demand appears highest but limited availability in locations with more limited demand – e.g. Tranent and Macmerry.*
  - *...Lack of land available for economic purposes...*
  - *...East Lothian has historically been viewed as averse to economic development... As a result, East Lothian has been poor at creating and attracting new jobs.*
- 1.12. The key challenges identified in the Strategy (page 17) include:
- *...The lack of viable employment land (i.e. land that is both zoned for economic use and with real development prospects) is a significant constraint to attracting business of scale to East Lothian. This ... highlights the need for East Lothian's Local Development Plan to align with East Lothian's Economic Development Strategy.*
  - *...The large proportion of residents who commute to Edinburgh and beyond to work means valuable skills and spend are exported from East Lothian on a daily basis. Increasing the number of East Lothian residents in East Lothian jobs will benefit the economy both directly and indirectly.*
- 1.13. Key actions identified in the *East Lothian Economic Development Action Plan* which accompanies the Strategy include:
- *...review demand for East Lothian's business premises and explore opportunities to enhance local business premises offer... (page 7).*
- 1.14. The proposal to expand Fenton Barns by Wallace will support this *Economic Development Strategy*.
- Emerging Local Development Plan**
- 1.15. The East Lothian Local Development Plan (LDP) Main Issues Report (MIR) (November 2014) notes that:

*...Although the current East Lothian Local Plan 2008 allocates a substantial amount of land for employment use, very little of this has been developed. Much of this land is in the control of parties seeking to develop the land for alternative uses: in addition, the scale of demand and potential users are unlikely to deliver the investment needed to achieve the servicing and delivery on much of this land. Much of this land has remained undeveloped through successive development plans whilst some has been developed for uses other than employment, including housing (paragraph 5.33).*

*...A significant challenge for the Council and for the LDP is to increase the job density in the area and to ensure that opportunities for job creation and economic growth are generated alongside an increase in population and the delivery of new homes. (paragraph 5.34).*

- 1.16. Despite the large number of jobs present at Fenton Barns, there is no direct reference in the MIR about the future role of Fenton Barns in economic terms. The only reference to Fenton Barns is in



terms of its potential to form part of a new settlement in future along with Drem (site reference OTH-N11: *Potential Drem Expansion Area of Search*):

*...together with the area of employment uses at Fenton Barns to the north, this general location may present an opportunity for a significant urban expansion in the medium to long term, should one be required to meet future housing requirements (MIR page 150).*

- 1.17. In terms of any future expansion at Fenton Barns, it needs to address economic as well as future housing requirements.

**Potential contribution of Fenton Barns to help deliver LDP objectives**

- 1.18. Land at Fenton Barns is being promoted by Wallace to the Proposed LDP as a new village. A comprehensive submission has been made to demonstrate how the designation of the land at Fenton Barns as a new settlement would assist in meeting East Lothian's housing requirements as well as delivering essential infrastructure such a new drainage system and primary school. The Indicative Development Framework for this proposal is shown in Figure 1: *Indicative Development Framework*.
- 1.19. The submission to the Council explains how through the designation of Fenton Barns as a new village of 1,000 homes, the sale of land for housing can be used to achieve the following:
- Resolve the drainage system which is currently failing to meet SEPA's discharge requirements;
  - Release funds to DC Watson to invest in an upgrade to existing premises plus investing in existing infrastructure, services, and local roads within Fenton Barns;
  - Release funds to DC Watson to invest in the delivery of new economic premises to meet existing demand; and
  - Release funds to DC Watson to invest in the delivery of further retail premises to complement the existing offer and thereby improve the Fenton Barns Retail Village as a visitor attraction.
- 1.20. The establishment of Fenton Barns as a settlement and the allocation of residential development is different from every other site being promoted to the Council for inclusion in its future development strategy. The reason for this is the presence of the many businesses (both tenants and owners) on the site and the role that DC Watson as landowner has in operating a business which contributes to the economic growth of East Lothian.
- 1.21. This Report presents an analysis of the role that Fenton Barns has in the local economy. This is explained in Chapter 2.
- 1.22. The proposal presented to the MIR highlighted the prospect of further economic and retail land being realised if the site is allocated as a new village in the Proposed Plan. Chapter 3 highlights the potential for growth at Fenton Barns, by assessing the capacity of available land to accommodate further commercial and retail growth.
- 1.23. Finally, Chapter 4 highlights the overall contribution that the establishment of a new village would have in economic terms. This is the legacy for East Lothian if Fenton Barns is designated as a new settlement, or part of a new settlement.
- 1.24. All plans and drawings referred to are included in Annex 2.

## 2.0 Fenton Barns' contribution to East Lothian's economy

2.1 A survey was carried out at Fenton Barns in April 2016. This examined the type, number and size of existing businesses, including both units owned by DC Watson, and other businesses. The findings of this survey are presented in this Chapter. Survey findings in relation to expansion potential are presented in Chapter 3.

2.2 The survey obtained information from over two-thirds of business units at Fenton Barns. Contact could not be made with the remainder. A copy of the survey form used is at Annex 3.

### Accommodation Schedule

2.3 The scale of DC Watson's operations at Fenton Barns is shown in Figure 2. The accommodation is disaggregated into 6 areas.

2.4 A detailed Accommodation Schedule of existing businesses at Fenton Barns in these areas is included at Annex 4. This includes details of the business occupying each unit, the types of use, floorspace, and number of employees. The majority of the accommodation rented by DC Watson is in former buildings associated with their use as part of an airfield, dating back to the First and Second World Wars.

### Survey findings

2.5 The total number of enterprises operating at Fenton Barns is 100. This includes a number of units being used for storage.

2.6 The total floorspace across all the business units operated by DC Watson is 10,050 sq m (108,177 sq ft). Accommodation ranges in size from small offices of 11 sq m (120 sq ft) to a food processing unit of 360 sq m (3,910 sq ft). There is no accommodation let as a premises above 460 sq m (5000 sq ft).

2.7 The breakdown of accommodation in terms of size is as follows:

Floorspace (sq ft)	Floorspace (sq m)	Number of units
<500	<46	21
500-999	46-93	11
1,000-2,499	93-232	55
2,500-4,999	232-464	3
5,000+	464+	0

2.8 The majority of the units available are mid-sized units at between 1,000 and 2,499 sq ft. In fact, there are only 3 businesses occupying accommodation of greater than 2,500 sq ft (232 sq m). Nearly 20% of the available accommodation is in the smaller buildings (less than 500 sq ft / 46 sq m).

2.9 A wide range of types of business are located at Fenton Barns across a range of Use Classes. The approximate breakdown of these is as follows:

Use class	Description	Number of units
1	Retail	16
2	Professional services	12
3	Food and drink	2
4	Business	21
5	General Industrial	0
6	Storage or distribution	27
10	Non-residential Institutions	1
Non-classified (Sui Generis)	Miscellaneous, e.g. car servicing and repairs	12

2.10 Currently, the largest grouping of buildings (27 units) are currently used a storage. However, 21 units serve the business market. Given the role of Fenton Barns as a speciality retail village, 16 units serve this market sector. Professional services account for a further 12 units.

2.11 All of these Use Classes are compatible with residential amenity.

**Overall employment**

2.12 The total number of existing jobs at Fenton Barns is 391, of which the majority (360) are full-time). These figures are likely to under-report the actual total given that a substantial number of businesses could not be contacted through the employment survey (including Andrew Black and Browns Food Group).

2.13 The majority of businesses at Fenton Barns are small and local, with fewer than 5 employees.

**Stability of employment base**

2.14 The employment base at Fenton Barns is relatively stable, with over a quarter of units having been occupied by the same company for over 5 years.

**Business owners**

2.15 A significant majority of business owners contacted (79%) are residents of East Lothian, highlighting the significant contribution made by Fenton Barns to local employment.

## 3.0 Potential for economic expansion

- 3.1 The development plan for the Fenton Barns area consists of the approved SESplan Strategic Development Plan (SDP) (2013) and the adopted East Lothian Local Plan (2008). The Fenton Barns area is not specifically designated in the adopted Local Plan but rather is classified as part of the *countryside*.
- 3.2 Despite the location of all of these businesses and activities at Fenton Barns together with some housing, the area is not designated as a settlement in the adopted Local Plan.
- 3.3 Policy DC1 of the Local Plan does allow for new build business use *...of an appropriate scale and character for its proposed location in the countryside...* but the Local Plan does not actively recognise the importance of Fenton Barns in economic terms or lend any policy support for its ongoing economic development.
- Survey findings – demand for expansion**
- 3.4 The survey carried out in April 2016 examined the desire of existing businesses to remain at Fenton Barns, and any plans for expansion to different sized premises or to take on more staff within the next 5 years.
- 3.5 Almost all businesses contacted (96%) wished to remain at Fenton Barns over the next 5 years. Many wished to expand in terms of increasing employment and recognising the need for larger premises.
- 3.6 DC Watson reports that there is substantial ongoing demand for the existing premises, both commercial and retail. Currently, there are no vacant premises available at Fenton Barns.
- 3.7 The survey also gathered qualitative information from businesses about the merits of Fenton Barns as a location. These comments are set out in the table below.
- 3.8 It can be seen from the comments that businesses generally considered Fenton Barns to be a well-established area in a good location to suit their needs. A common theme was the need for more space to allow businesses to expand. The demand for other businesses to move in was also highlighted. Lack of vacant premises is a constraint to economic growth.
- 3.9 Accessibility to public transport was also highlighted as a matter that needs to be improved.
- 3.10 The comments also highlighted a specific issue in relation to the Retail Village area of Fenton Barns. The units in the north of the Retail Village were seen as isolated from the other units to the south.
- 3.11 The survey also highlighted that the majority of business owners live in East Lothian.
- 3.12 In response to the findings from the survey and following advice from DC Watson, it is evident that any future investment in new business or retail accommodation needs to have flexibility to cater for the wide range in demand for accommodation needs.
- 3.13 It is noted that the available accommodation is concentrated at the smaller end of the market, below 2,500 sq ft.



Comments from Survey			
North Berwick Bathroom & Tile	Pros:	Good location for retail/business units. Great for parking, easy to come and go.	
	Cons:	Poor signage.	
DH Auto	Pros:	Well established area for retail and business.	
	Cons:	N/A	
Stuart White Dental	Pros:	Quiet area, his business prefers privacy.	
	Cons:	N/A	
Edinburgh Workshops	Pros:	Great location, well established area for business.	
	Cons:	N/A	
S&R Coachworks	Pros:	N/A	
	Cons:	Location from Edinburgh, too far to travel from city.	
Edinburgh Preserves	Pros:	Great location, owner lives locally.	
	Cons:	N/A	
Old Pines & Pieces	Pros:	Well established area.	
	Cons:	Requires more retail units. Mentioned his disappointment at previous refusal of PP for more retail units.	
Kiln & Cutter	Pros:	Well established area.	
	Cons:	Lack of connection of northern units with central units.	
Sign Man	Pros:	Well established area	
	Cons:	Need for larger units.	
Fenton Bams Farm Shop	Pros:	Well established area.	
	Cons:	Lack of space, bigger, newer units required.	
Silver Teal Cooks	Pros:	Great location, owner lives locally.	
	Cons:	More space required for future expansion	
2 <sup>nd</sup> Time Round	Pros:	Great location, easy to park.	
	Cons:	More infrastructure work required – roads and business units need upgrading. More units needed to link northern units with Fenton Bams central. Suggested that some poly tunnels for a market garden is a requirement for the area. Commented that there is a waiting list to get units in Fenton Bams. His friend has been trying to move in and is waiting on units to come available.	
Fenton Bams Nursery	Pros:	Well established area. Massive demand for their business.	
	Cons:	Need more buses coming through the area. Currently very limited.	
Stuart Motors	Pros:	Well established area.	
	Cons:	Very busy with work but doesn't currently see expansion. Market depending.	
Hangar Framing	Pros:	Business is well established in the area, parking is easy and employees are local.	
	Cons:	N/A	
George Cochran Carpet services	Pros:	Well established area, great parking.	
	Cons:	Need more space.	
Linton Country Furniture	Pros:	Good location, affordable units.	
	Cons:	Nowhere else to go, other locations are far too expensive to rent.	
Robbie Reid Furniture	Pros:	Good location, affordable units. Business well established at Fenton Bams.	
	Cons:	More space required.	
Shapes Upholstery	Pros:	Well established area.	
	Cons:	N/A	
Roddy Surfleet financial services	Pros:	Happy with location.	
	Cons:	N/A	
Monaghan Mushrooms	Pros:	Well established in the area, since the mid 80s. No problem finding employees in the area. Good ground conditions.	
	Cons:	N/A	

3.14 If there is an opportunity to provide new accommodation, it needs to meet the existing demand but recognise the potential to move expanding businesses to new premises above 2,500 sq ft.

3.15 New accommodation also needs to recognise the wide range of business uses which wish to grow in this location or be attracted to this location. The wider recognition of East Lothian's growing reputation as a food and drink supplier also offers further opportunities.

#### Proposal for flexible Class 4 building

3.16 Working with DC Watson, Geddes Consulting has designed a prototype building which can meet the business needs of typical Class 4 users. The Class 4 'business' Use Class includes the following uses:

- offices (other than Class 2);
- industry which is not in Class 5; and
- research and development of products or processes.

- 3.17 Class 4 uses can be carried on in any residential area without detriment to the amenity of the area due to noise, vibration, or smell.
- 3.18 This prototype building (Figure 3) has an overall size of 500 sq m (5,400 sq ft) on two storeys. It features shutter doors to each unit on the ground floor. This building can be subdivided to accommodate up to six businesses in a unit as small as 83 sq m (900 sq ft). This building is also capable of accommodating a single user.
- 3.19 The flexibility of the premises is also enhanced as the building can be divided vertically and horizontally to accommodate occupiers with varying requirements in terms of size and format. For example, the building could be used for manufacturing on the ground floor and office accommodation on the first floor, or even storage.
- 3.20 To serve up to 6 businesses, 16 parking spaces are provided per building. A range of building materials could be used including timber cladding. This is not only sustainable but minimises build costs to keep rents lower. Precedents are shown in Figure 3.

**Masterplan for commercial area**

- 3.21 The *Indicative Development Framework* for Fenton Barns (Figure 1) outlines the capacity for expansion of the commercial area to the west of the proposal. Further masterplanning has been carried out to gauge the capacity for expansion of the commercial activities at Fenton Barns through the development of a number of new buildings, using the prototype described above.
- 3.22 Currently, there are 46 existing business units located in this commercial area. The units house a variety of businesses and are single storey in height. Eleven of these units, located to the western edge of the commercial area, are used for storage purposes. There are also existing homes located in the area. The business units are generally located along the western and northern side of the existing road network. A large agricultural field is centrally located between these existing units.
- 3.23 The proposal for this area comprises an additional 18 commercial buildings that can be sub-divided into between 1 and 6 units (Figure 4).
- 3.24 The proposed buildings will be located in three distinct areas. These groups of buildings will integrate with the existing buildings. A comprehensive landscape framework is also proposed.
- 3.25 As part of this proposal, an area of land (totalling 8,650 sq m, or 93,100 sq ft) will be serviced to meet the future requirements for potential inward investors looking to set up business in East Lothian. This serviced land can accommodate two businesses with bespoke building requirements. Alternatively, the site can be combined to accommodate a larger single inward investor.
- 3.26 Car parking will be located to the rear of these proposed buildings. As part of this proposal, works will be carried out to upgrade existing infrastructure. Buildings will form frontage where possible onto the existing road network. The road network will be upgraded to adoptable standard.
- 3.27 The Illustrative Masterplan for this commercial area (Figure 4) utilises all of the land in the ownership of DC Watson. These 18 buildings can accommodate a total of 8,500 sq m (91,500 sq ft) of accommodation.
- 3.28 Up to 108 new businesses of varying sizes could be accommodated. These additional buildings have the potential to almost double the accommodation available for DC Watson to let.

### **Masterplan for Retail Village**

- 3.29 Currently, there are 43 existing businesses located in the Retail Village area. The existing buildings vary in footprint and size and are single storey in height. The majority of the existing businesses (39) are located centrally around the Farm Shop Café. The northern section of the Retail Village contains 9 businesses, separated from the rest of the Retail Village by a redundant pitch and putt course. These buildings are sheltered by trees and shrubs to the west. This redundant area is the proposed location for an expansion to the Retail Village.
- 3.30 There is known demand to increase the supply of speciality retailing at Fenton Barns and build on its success. Feedback highlighted the lack of connectivity between the various buildings used for this purpose. An Illustrative Masterplan has been produced to gauge the capacity for further expansion of the Retail Village. This is shown in Figure 5.
- 3.31 19 proposed new single-storey buildings will provide a connection between both parts of the existing Retail Village. The proposed development will be enclosed by existing tree planting to the west. These buildings will be adaptable, allowing the possibility for connection to provide larger premises. Car parking will be provided to the rear of these retail buildings.
- 3.32 The buildings will be located along a new tree-lined road. Pedestrian routes are provided to allow easy access around the expanded Retail Village. A series of open spaces, courtyards and nodes are planned along this new road to create interest and character as gathering spaces. This will support and enhance the established sense of place at the Retail Village. The provision of these gathering spaces will encourage vitality within the Retail Village.
- 3.33 The centrepiece of the proposed expansion is a large building to be used for a variety of purposes. DC Watson considers that the building could be used as a showcase for the best of food and drink made in East Lothian – ‘the best of East Lothian produce’. This would operate similar to an indoor farmers’ market with café facilities. With its landscaped courtyard, it will be the hub of the expanded Fenton Barns Retail Village. It provides an opportunity to host events such as food festivals and other events, enhancing the vitality of the Fenton Barns area.
- 3.34 DC Watson will also incorporate a new serviced office building as part of the proposal. Finally, new housing is proposed, fronting onto the existing road.
- 3.35 To the north of the Retail Village, at the entrance into Fenton Barns, a further seven new commercial buildings are proposed.

### **Summary of proposal**

- 3.36 A summary breakdown of the capacity for additional development identified through the masterplanning proposal is set out in the table below. This demonstrates that there is the capacity and potential to provide new floorspace of over 15,000 sq m (162,000 sq ft). This is in addition to the existing floorspace of 10,500 sq m (108,000 sq ft) across the business units currently operated by DC Watson.
- 3.37 The floorspace operated by DC Watson could therefore be more than double if DC Watson has sufficient resources to maximise the space available through developing the potential capacity of the land as outlined in these masterplans.

LOCATION	NEW FLOORSPACE
<b>Commercial area</b>	
18 new commercial buildings (1-6 units each)	8,500 sq m (91,500 sq ft)
Serviced land for inward investors	8,650 sq m (93,100 sq ft) – total site area
<b>Retail Village</b>	
19 new retail buildings	2,670 sq m (28,700 sq ft)
Multi-use building / indoor market	1,050 sq m (11,300 sq ft)
Serviced office building	350 sq m (3,800 sq ft)
7 commercial buildings	2,500 sq m (26,900 sq ft)
<b>TOTAL (buildings)</b>	<b>15,070 sq m (162,200 sq ft)</b>

- 3.38 Further guidance would be welcomed from the Council on integrating the potential supply of accommodation with market demand, and exploring the overall theme of food and drink to realise the full potential for East Lothian.



## 4.0 Realising Fenton Barns' economic potential

- 4.1 The proposal for Fenton Barns submitted to the LDP Main Issues Report has outlined the scale of economic development which could be delivered if the site is allocated for development in the Proposed Plan. The scale of economic development in this proposal is of strategic importance in terms of the Council's *Economic Development Strategy*.
- 4.2 Further economic and retail development at Fenton Barns is uniquely placed to provide additional employment opportunities and help maximise the contribution of this established employment area to the economy of East Lothian.
- 4.3 DC Watson, as landowner, is committed to supporting and expanding Fenton Barns as a key employment location, as part of a wider proposal for a new settlement at this location.
- 4.4 A masterplanning exercise has been carried out to assess the capacity for further economic and retail development at Fenton Barns.
- 4.5 As shown in Figure 4, there is an opportunity to develop a further 18 commercial buildings for Class 4 use in the western commercial area of Fenton Barns, together with a serviced site for inward investment. These new buildings have a floorspace of 8,500 sq m (91,500 sq ft), plus a site of 8,650 sq m (93,100 sq ft) of serviced land for inward investment. These 18 commercial buildings could accommodate up to 108 businesses.
- 4.6 A review of the capacity within the Retail Village confirms that a further 19 retail buildings could be provided, along with 7 commercial buildings, a serviced office, and 8 houses (as shown in Figure 5). The hub of the Retail Village will be strengthened with the provision of a new building showcasing 'the best of East Lothian produce'. This expansion will add further vitality to the Retail Village. The total new floorspace which could be accommodated is 6,570 sq m. (70,700 sq ft). These premises could accommodate over 30 new businesses.
- 4.7 This masterplanning exercise has resulted in an update to the *Indicative Development Framework* and the updated version is shown in Figure 6.
- 4.8 This capacity assessment demonstrates that DC Watson has the potential to more than double its business and help around 140 new businesses establish themselves or expand in East Lothian. The scale of accommodation is flexible and helps address the need for business accommodation in East Lothian as identified in the Council's *Economic Development Strategy 2012-2022*. If 140 businesses can be established in the future then this scale of accommodation helps support the need for an additional 350 businesses set out in the Strategy.
- 4.9 The investment to realise this considerable potential can only be realised through additional investment from DC Watson. The allocation of a new village at Fenton Barns provides the mechanism to secure this capital investment.
- 4.10 These economic proposals at Fenton Barns are in accord with the Council's *Economic Development Strategy 2012-2022* and are designed to address some of the key weaknesses identified in this Strategy.
- 4.11 Identifying and designating Fenton Barns as a settlement in the Local Development Plan would be a major step forward in starting to realise this economic potential.

- 4.12 Safeguarding the general location of Fenton Barns and Drem as an opportunity for significant urban expansion in the Local Development Plan to meet future housing requirements would initiate the potential to secure future housing. This would then release much needed capital investment.
- 4.13 The creation of significant new capital investment then allows the landowner to realise the commercial and retail potential outlined in this Report, as well as providing the solution to the existing drainage problems.
- 4.14 The assessment of Economic Benefits undertaken by Turley Economics (Annex 1) confirms the significant scale of economic benefits that would be realised through this scale of investment.
- 4.15 In contrast, proposals put forward by other housebuilders, developers and landowners in response to the LDP Main Issues Report (MIR) do not offer the same scale of economic benefits to the East Lothian economy.
- 4.16 A cornerstone of the Council's development strategy is to promote sustainable development. One of the factors to deliver a sustainable development is providing employment opportunities alongside new housing opportunities. This reduces need to travel for work.
- 4.17 Given that most businesses at Fenton Barns are owned by East Lothian residents, additional job generation is likely to reduce commuting out of East Lothian and enhances East Lothian's job density. The proposal for Fenton Barns is unique in the submissions to the MIR as it promotes housing with economic development.
- 4.18 Wallace Land Investments and DC Watson & Sons (Fenton Barns) Ltd welcome the opportunity to discuss how this economic potential can be further aligned with the Council's *Economic Development Strategy*.

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## Annex 1: Economic Benefits Summary Statement

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# **Fenton Barns**

## Economic Benefits Summary Statement

Wallace Land

May 2015

# Contents

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1.	Economic Benefits Summary Statement	1
	Appendix 1: Infographic Diagram	6

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**Contact**  
Amy Gilham  
Associate Director – Economics

May 2015

# 1. Economic Benefits Summary Statement

## Introduction

- 1.1 This Economic Benefits Statement has been prepared by Turley Economics, on behalf of Wallace Land, in support of plans for a proposed village development on land at Fenton Barns, East Lothian.
- 1.2 This Economic Benefits Statement utilises Turley Economics' Local Economic Benefits (LEB) methodology. LEB provides a robust logical framework for evaluating the economic impacts of development proposals.
- 1.3 Turley Economics' impact model has been used by Richborough Estates, Peel Holdings, Barratt DWH, Miller Homes, Keepmoat Homes, Taylor Wimpey, Banks Developments, Hammerson, Mansell Homes and Greene King to successfully support a range of planning applications for residential, commercial and mixed use development across the UK. Turley Economics' impact model is used to examine scheme socio-economic impacts at the pre-application and consultation stages, as well as to inform full Economic Impact Assessments (EIA) of proposed development.
- 1.4 This assessment of economic impacts evaluates the current economic impacts of existing employment uses at Fenton Barns and their value to the local East Lothian and wider Scottish economies, in order to demonstrate the importance of delivering development and an associated solution to the known sewer treatment issue that will safeguard their future.
- 1.5 This assessment of economic impacts also evaluates the potential economic impacts of emerging scheme details incorporating 1,000 residential dwellings including 250 (25%) affordable, 15,000 sqm of studios and workshops, 1,250 sqm office space for start-ups, 650 sqm of retail including a post office, a 1 Form of Entry (FE) primary school including 200 sqm for community uses such as meeting rooms, and a 200sqm GP and dentist surgery.
- 1.6 It should be noted that the scheme components which have been modelled are indicative and are not yet confirmed.
- 1.7 This evaluation considers the quantifiable impacts of the proposed development both during the construction phase and the subsequent operational 'lifetime' phase.

## Retained Economic Benefits

- 1.8 The development and associated sewer treatment works solution will enable the continued operation of the existing employment uses on the site. Overall there are 80 businesses. We estimate that these operations currently support:
  - A total of 500 employees or 375 FTE jobs<sup>1</sup> directly on-site. A proportion of these jobs will be taken by residents outside of the local and wider impact areas;
  - Approximately £27.2 million GVA per annum across the wider impact area;

- Approximately £8.5 million in salaries<sup>ii</sup>; and
- A range of occupations including managerial, customer service, agricultural, manufacturing and semi-skilled occupations.

## Economic Benefits of Proposed Development

### Construction Phase

1.9 The following headline economic impacts have been identified as being derived from the provision of a new village including homes, commercial properties and community facilities on the application site during the construction phase:

- **Direct Construction-Related Employment** – the proposed development has the capacity to support approximately 1,844 person-years of direct employment within the construction sector. This equates to an average of **184 full-time equivalent (FTE) temporary construction jobs** on-site annually<sup>iii</sup>, of which it is estimated that 131 FTE jobs per annum could be sourced from the Scottish labour force, including locally within East Lothian<sup>iv</sup>.
- **Construction-Derived Indirect and Induced Employment** – a further annual average of **236 FTE temporary jobs** would be supported within the supply chain, related businesses, and onward expenditure within East Lothian and across the wider Scottish economy throughout the construction period<sup>v</sup>.
- **Construction-Related Productivity** - the construction phase of the proposed development will generate a significant increase in Gross Value Added (GVA)<sup>vi</sup>, which provides a key measure of economic productivity. Put simply, GVA is the total of all revenue into businesses, which is used to fund wages, profits and taxes. The construction capital expenditure associated with the proposed development could deliver an annual net additional **£24.2 million GVA contribution to the Scottish economy** each year, of which circa £9.7 million per year could contribute to the growth of the East Lothian economy<sup>vii</sup>, during the construction period.

### Operational Phase

1.10 The following headline economic impacts have been identified as being derived from the provision of new residential dwellings and commercial and community buildings on the application site during the operational lifetime of the proposed development:

- **Direct Operation-Related Employment** – there is potential to support an average of **499 full-time equivalent (FTE) jobs** on-site annually during the lifetime of the proposed development, of which it is estimated that 474 FTE jobs per annum could be sourced from the Scottish labour force, including locally within East Lothian.
- **Operation-Derived Indirect and Induced Employment** – a further annual average of **265 FTE jobs** would be supported within the supply chain, related businesses, and onward expenditure within East Lothian and across the wider Scottish economy throughout the lifetime of the proposed development.

- **Operation-Related Productivity** - the operational 'lifetime' phase of the proposed development could support the annual net additional **£45.5 million GVA contribution to the Scottish economy** each year, of which circa £28.1 million per year could contribute to the growth of the East Lothian economy<sup>viii</sup>.
- **Business Rates Revenue** – The proposed development includes commercial uses that will be liable for payment of business rates, which will contribute to the cost of the local authority providing public services within which the business property is situated. The Scottish Government introduced a Business Rates Incentivisation Scheme (BRIS) in April 2012, which enables local authorities to retain 50% of the revenue that exceeds the non-domestic rate income target level set out by the Scottish Government. It is estimated that the proposed development would generate **approximately £480,000 business rate revenue per annum**, of which at least 50% – or circa £240,000 – could be retained by East Lothian Council each year.
- **Enhanced Local Labour Force & Spending Power** – there is potential to increase the local population by **circa 2,230 people** residing within 1,000 new high quality homes<sup>ix</sup>. Based on this total population growth, there will be **circa 1,054 economically active and employed residents** residing on the completed scheme<sup>x</sup>. These residents will bolster local labour supply, with circa 43% projected to be employed in higher skilled and professional occupations.
- **Support for Local Retail & Leisure Services** – as a result of the uplift in local resident population there is the potential to capture **circa £11.6 million of household retail (convenience and comparison) expenditure, and £6.2 million of leisure (goods and services) expenditure**, every year within East Lothian and the wider Scottish economy, from households living on the completed scheme<sup>xi</sup>. This will help to boost the vitality and viability of local shops and businesses, and sustain essential local leisure and support services.
- **Retail & Leisure Employment** - The increase in local retail and leisure expenditure generated by new residents on the application sites will, in turn, support additional employment throughout the operational lifetime of the proposed development. It is estimated that **59 retail jobs, and a further 182 jobs in the leisure industry, will be supported in East Lothian and the wider Scottish economy**<sup>xii</sup>. Some of these jobs might be supported on the site within the commercial and retail space proposed<sup>xiii</sup>.
- **Public Council Tax Revenue for Investment in Community Services** – the construction of the new homes on the application site would generate **circa £2.3 million additional Council Tax revenue** for East Lothian Council per annum upon full occupation<sup>xiv</sup>.
- **Public Land and Buildings Transaction Tax (LBTT) Revenue for Investment in Community Services** - the proposed development also has the potential to generate **circa £8 million LBTT payment** based on the estimated values of the new homes on the proposed application site. This will provide an important source of revenue funding for the Scottish Government in delivering public



services as well as investing in maintaining and enhancing infrastructure within the wider impact area.

- 1.11 Once complete the commercial (non-residential) components of the village will support 874 FTE jobs on site and a further 444 FTE jobs including induced and indirect effects across the wider Scottish economy. A total of £72.7 million GVA per annum will be supported. This relates to both existing uses and the proposed commercial and village centre uses.
- 1.12 The estimated economic benefits derived from delivery of the proposed development and retention of existing operations presented above are reproduced in a summary infographic format within Appendix 1.

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<sup>i</sup> Analysis based on the assumption that 25% of jobs are full-time seasonal (only half of the year), 25% of jobs are part-time and 50% of jobs are full-time.

<sup>ii</sup> Analysis based on the assumption that 10% of jobs are managerial jobs, 40% of jobs are customer services jobs and 50% of jobs are agricultural/manufacturing production/semi-skilled jobs.

<sup>iii</sup> HM Treasury considers that 1 permanent FTE construction job is equivalent to 10 person-years of employment. This therefore assumes a 10 year construction period as standard. In reality the volume of construction employees on site will fluctuate and will be higher if the construction period is reduced. It is assumed that the proposed development will have a 10 year construction period allowing for site preparation, infrastructure and residential development.

<sup>iv</sup> Local and regional labour market containment assessed utilising ONS 2011 Census data.

<sup>v</sup> Direct, indirect and induced impacts applied utilising leakage, displacement and multiplier effects in line with HCA (2014) Additionality Guide Fourth Edition.

<sup>vi</sup> GVA measures the value of output created (i.e. turnover) net of inputs purchased and used to produce a good or service (i.e. production of the output). GVA therefore provides a measure of economic productivity.

<sup>vii</sup> Average GVA per FTE employee estimates within East Lothian and the Scottish construction sector sourced from Experian Local Market Forecasts (average trend derived from 2010-14 period).

<sup>viii</sup> Average GVA per FTE employee estimates within East Lothian and the Scottish manufacturing; retail; recreation; land, transport, storage and post; accommodation and food services; professional services; education; and health sectors sourced from Experian Local Market Forecasts (average trend derived from 2010-14 period).

<sup>ix</sup> Assuming 2.23 persons per household in line with average household size in the East Lothian ward of North Berwick Coastal, drawn from the Census 2011.

<sup>x</sup> NOMIS (2015) ONS APS (Jan 2014 - Dec 2014).

<sup>xi</sup> Expenditure data drawn from Oxford Economics via Pitney Bowes – estimates in 2013 prices.

<sup>xii</sup> Analysis utilises BPE 2014 Scotland data for the retail and arts, entertainment and recreation sectors to determine the number of jobs supported and / or generated.

<sup>xiii</sup> The on-site jobs and supported retail and leisure jobs figures should therefore not be summed.

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<sup>xiv</sup> Utilises projected 2016/17 Council Tax charges based on 2% inflation of published 2015/16 charge applied by East Lothian Council.

# Appendix 1: Infographic Diagram

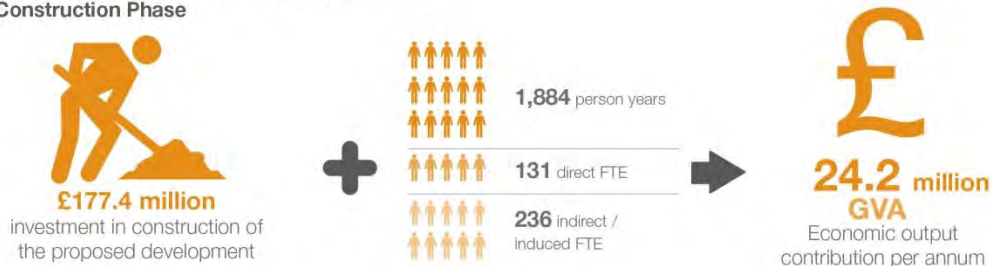
## Economic Benefits Infographic

Site: Fenton Barns, East Lothian

### Retained Economic Benefits



### Economic Benefits of the Proposed Scheme Construction Phase



### Operational Phase Residential

“ 1,054 working age economically active and employed residents estimated to live on the new development ”



### Commercial



### Total operational impacts from commercial and community uses



<sup>1</sup> A person year is the volume of work that is equal to the output of a single person in a single year (i.e. the volume of construction workers required to deliver the proposed scheme in a single year).

<sup>2</sup> GVA (Gross Value Added) measure the value of output created (i.e. turnover) net of inputs used to produce a good or service (i.e. production of outputs). It provides a key measure of economic productivity. Put simply the GVA is the total of all revenue into businesses, which is used to fund wages, profits and taxes.

**Turley**

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## Annex 2: Figures

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Do not scale from this drawing



Filepath: General / Projects 09012 - Wallace land / Wallace land / Sites / East Lothian / Fenton Barns / Plans & Drawings / Finished Drawings  
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# Fenton Barns



Drawing No. 14024-MP-P002  
Indicative Development Framework  
Figure 1

- Ownership
- Proposed Settlement Boundary for LDP
- Residential development
- Open space
- Commercial development
- Primary school
- SUDS measures
- Existing planting
- Proposed planting
- Primary streets
- Neighbourhood streets
- Gas pipeline
- Village street
- Nodes in street network

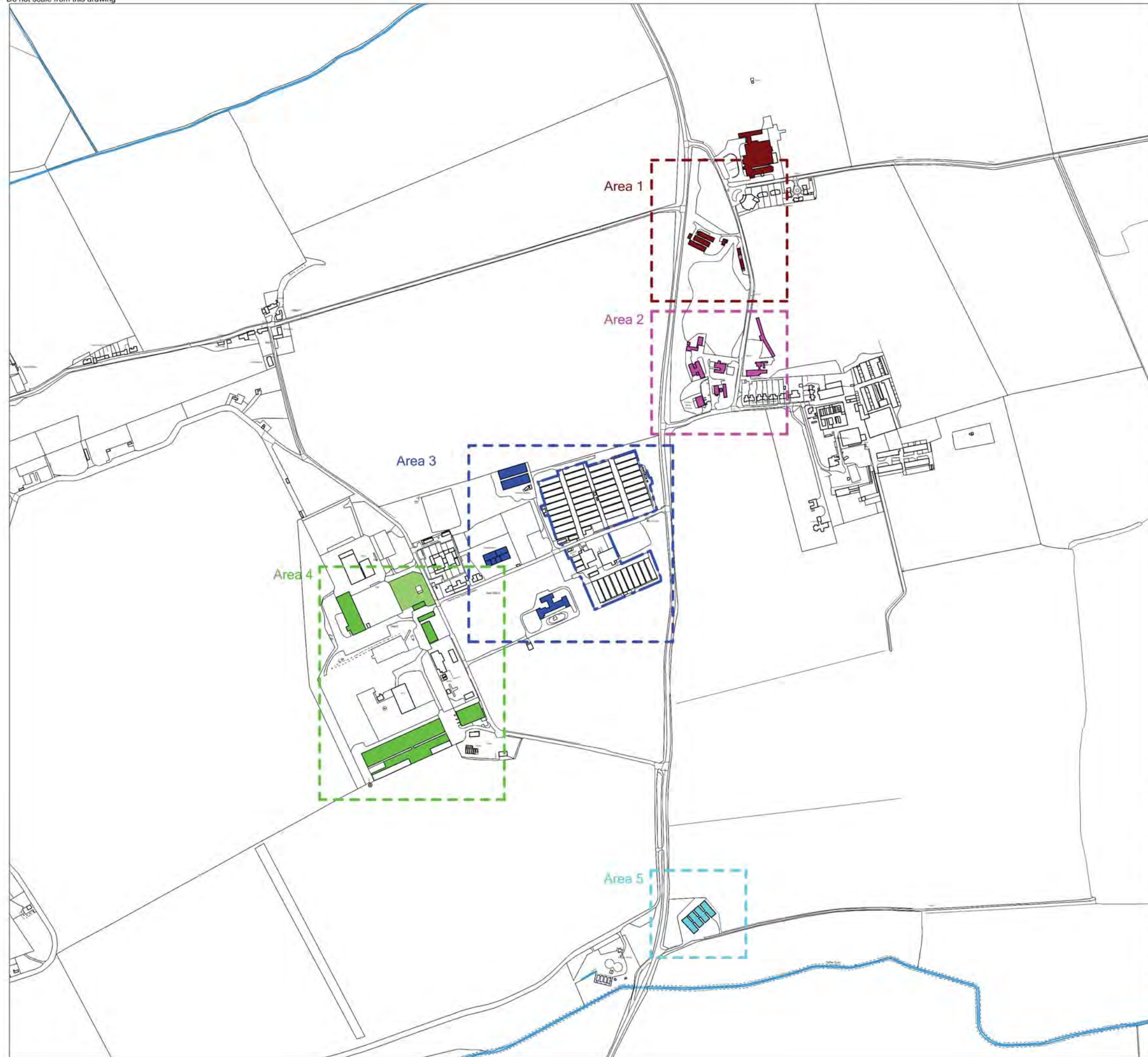
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Status: For Information  
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# Fenton Barns



Drawing No. 14024-STEM-P004  
Accommodation Schedule- Area Plan  
Figure 2

-  Accommodation Schedule - Area 1
-  Accommodation Schedule - Area 2
-  Accommodation Schedule - Area 3
-  Accommodation Schedule - Area 4
-  Accommodation Schedule - Area 5

Rev - (20.05.16) Drawn: SD - Checked: PMcL

Status: For Information

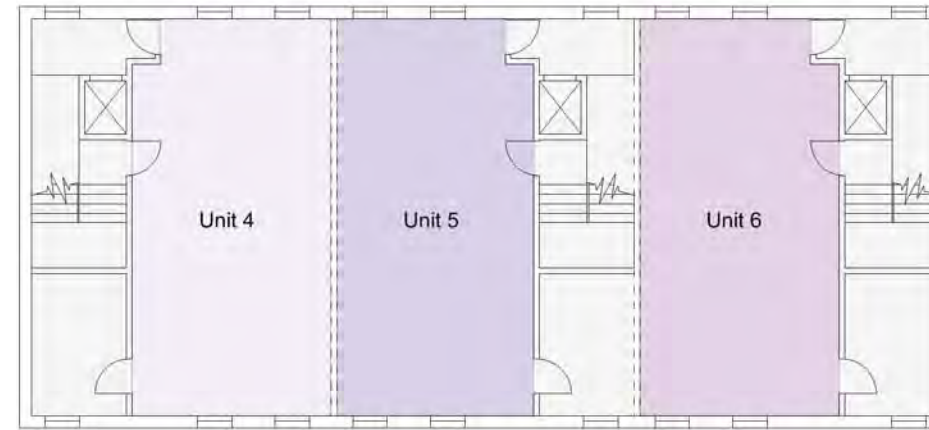
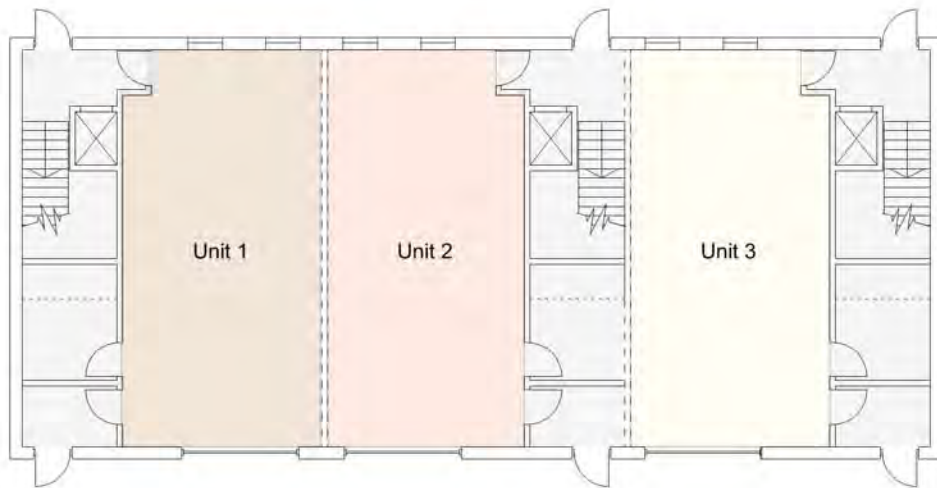
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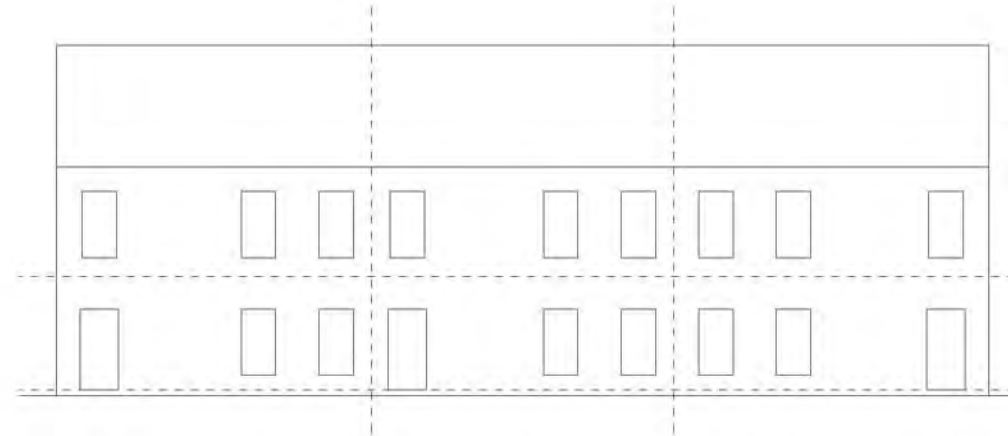
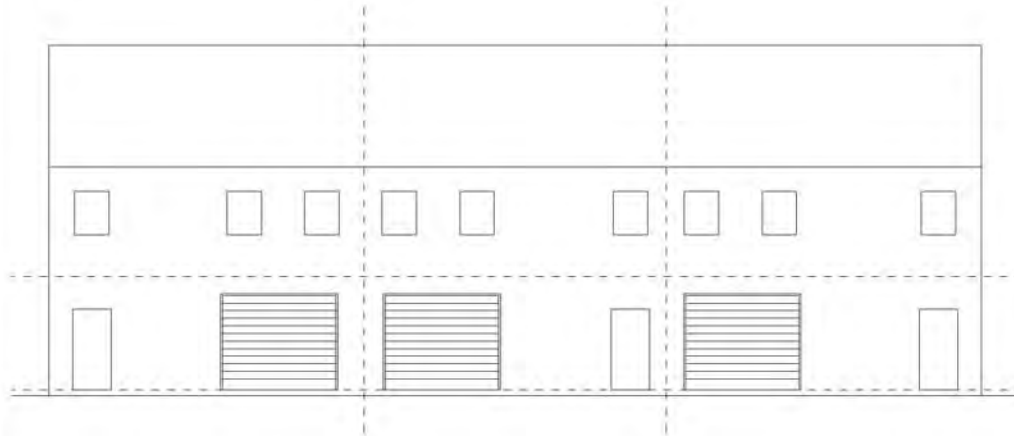
The Quadrant, 17 Bernard St., Edinburgh, EH6 6PW | Tel: 0131 5533639 | info@geddesconsulting.com



Do not scale from this drawing



The concept building is adaptable. It can be subdivided both horizontally and vertically to provide between 1 and 6 commercial units.



Precedents for sustainable commercial units



Filepath: General / Projects / 09012 - Wallace land / Sites / East Lothian / Fenton Barns / Plans & Drawings / Finished Drawings

# Fenton Barns



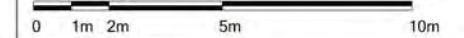
Drawing No. 14024-MPDF-P004  
Concept Commerical Building  
Figure 3

commerical building  
500m<sup>2</sup> (5,400ft<sup>2</sup>) - (2 storeys at 250m<sup>2</sup> (2,700ft<sup>2</sup>))  
Including circulation space

Rev - (27.04.16) Drawn: SD - Checked: KT

Status: For Information

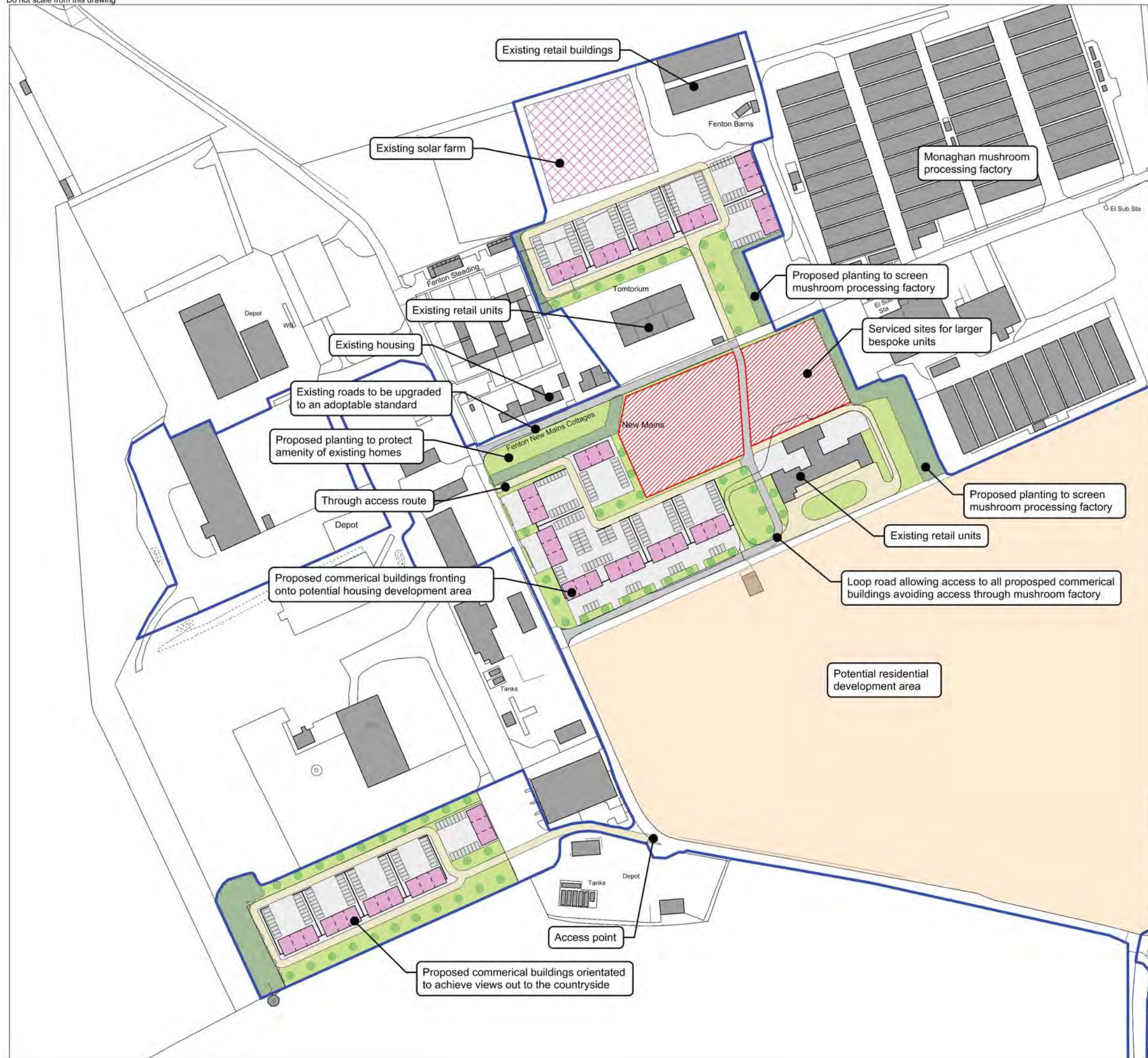
scale 1:200 @ A3



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Do not scale from this drawing



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# Fenton Barns



Drawing No. 14024-MPDF-P003-A  
Illustrative Masterplan - Commercial Area  
Figure 4

- Ownership boundary
  - Existing Buildings
  - Existing Solar Farm
  - 500m<sup>2</sup> (5,400ft<sup>2</sup>) commercial building (2 storeys at 250m<sup>2</sup> (2,700ft<sup>2</sup>))
  - Serviced sites for bespoke units 8,650m<sup>2</sup> (93,100ft<sup>2</sup>)
  - Potential residential development area
  - Proposed tree planting
  - Proposed structure planting
- Total footprint: 4,250m<sup>2</sup> (45,750ft<sup>2</sup>)  
 Total floorspace: 8,500m<sup>2</sup> (91,500ft<sup>2</sup>)  
 Total car parking: 280 spaces

Rev - (18.05.16) Drawn: SD - Checked: PMcL  
 Note: Annotation amended  
 Rev - (27.04.16) Drawn: SD - Checked: KT

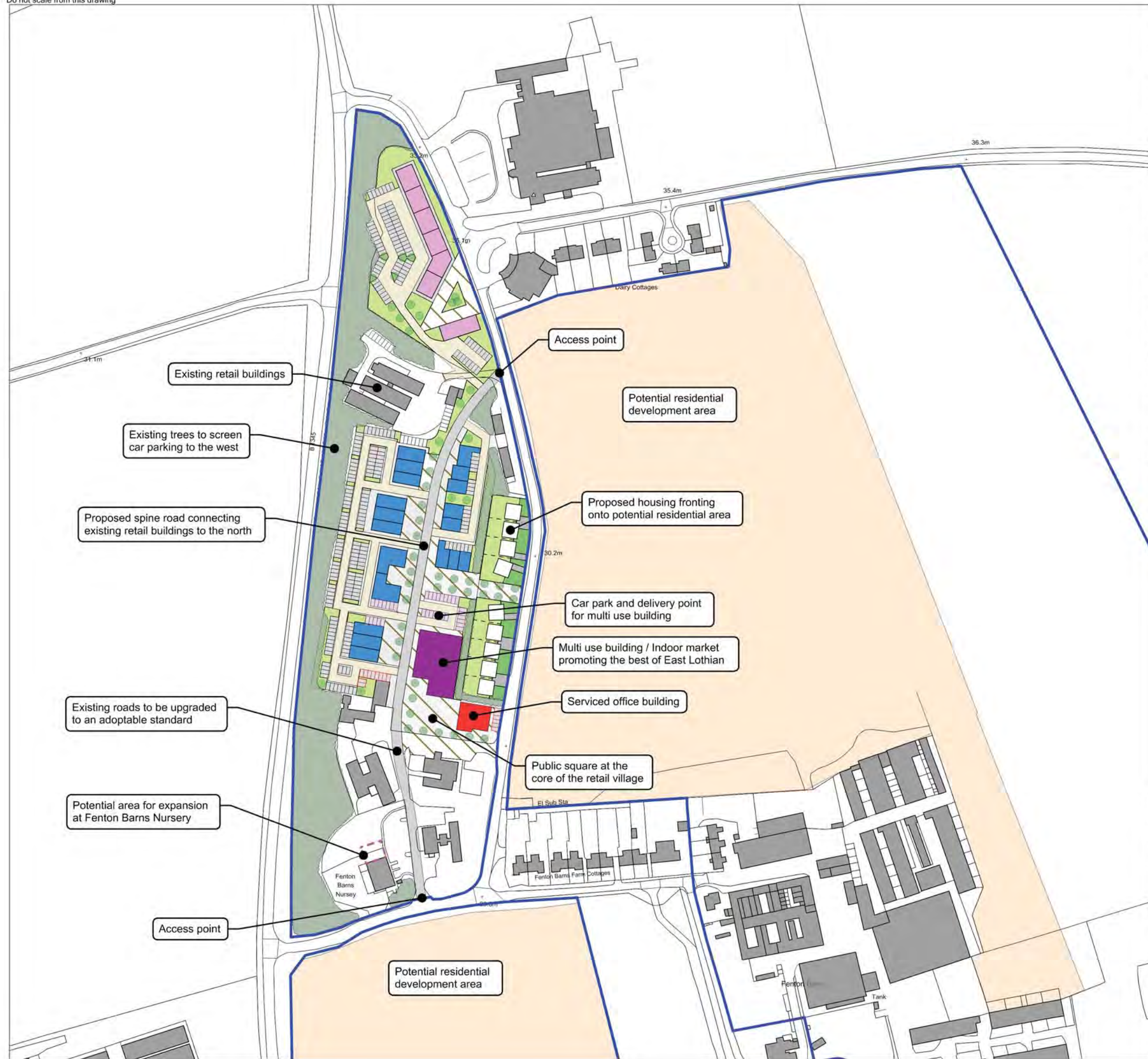
Status: For Information

scale 1:2,500 @ A3  
 0 25m 50m 100m





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# Fenton Barns



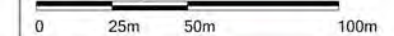
Drawing No. 14024-MPDF-P002  
Illustrative Masterplan - Retail Village  
Figure 5

- Ownership boundary
- Existing buildings
- Commerical units
  - Total footprint: 1,250m<sup>2</sup> (13,450ft<sup>2</sup>)
  - Total floorspace: 2,500m<sup>2</sup> (26,900ft<sup>2</sup>)
  - Total car parking: 85 spaces
- Retail units
  - Total footprint: 2,670m<sup>2</sup> (28,700ft<sup>2</sup>)
  - Total floorspace: 2,670m<sup>2</sup> (28,700ft<sup>2</sup>)
  - Total car parking: 90 spaces
- Multi use building / indoor market
  - Total footprint: 1,050m<sup>2</sup> (11,300ft<sup>2</sup>)
  - Total floorspace: 1,050m<sup>2</sup> (11,300ft<sup>2</sup>)
  - Total car parking: 35 spaces
- Serviced office
  - Total footprint: 350m<sup>2</sup> (3,800ft<sup>2</sup>)
  - Total floorspace: 350m<sup>2</sup> (3,800ft<sup>2</sup>)
  - Total car parking: 15 spaces
- Proposed Housing units
- Potential expansion area for nursery
- Potential residential development area
- Pedestrian / landscape area
- Proposed tree planting

Rev - (27.04.16) Drawn: SD - Checked: KT

Status: For Information

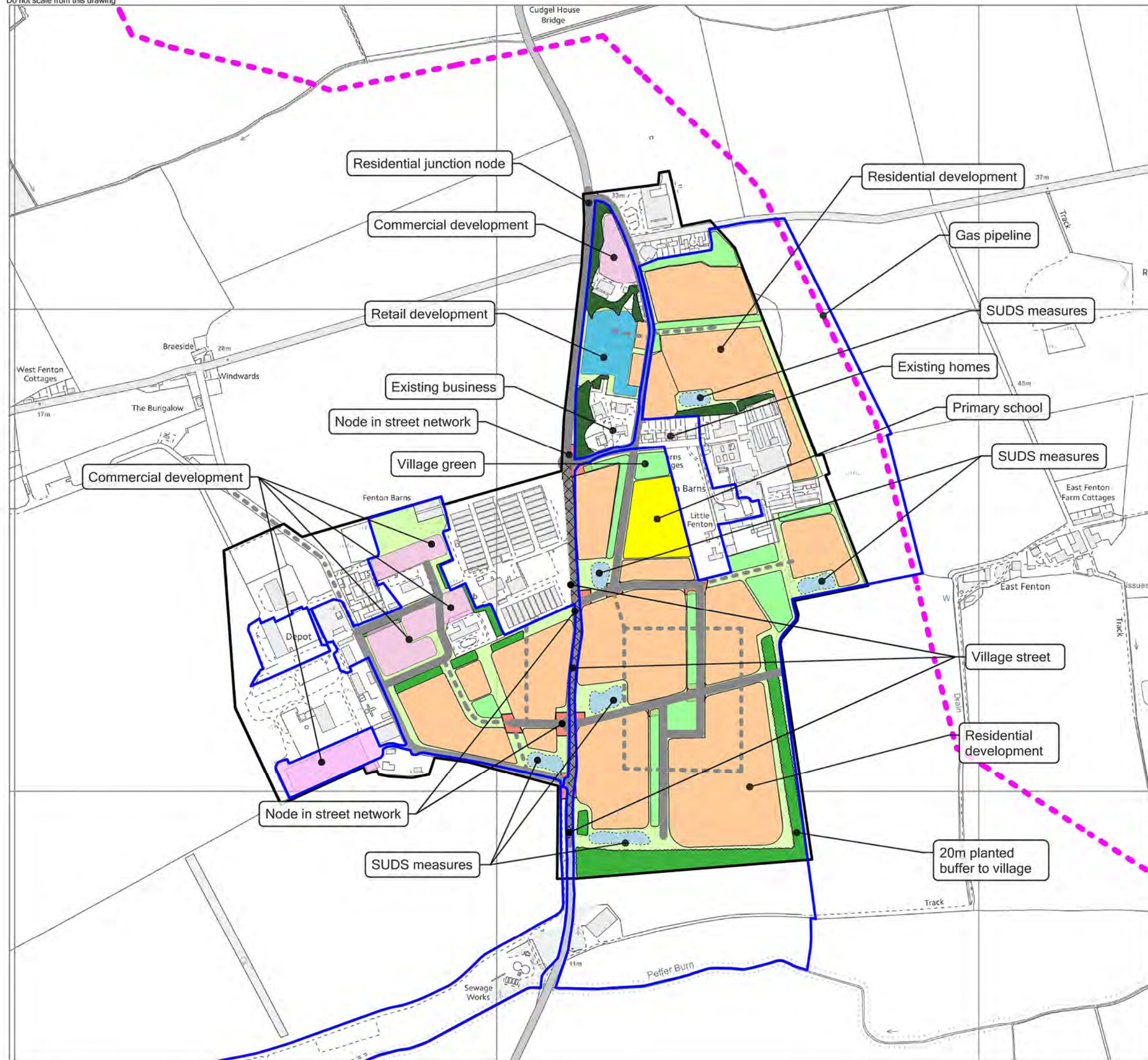
scale 1:2,500 @ A3



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# Fenton Barns



Drawing No. 14024-MPDF-P001  
Indicative Development Framework  
Figure 6

- Ownership
- Proposed Settlement Boundary for LDP
- Residential development
- Open space
- Commercial development
- Retail development
- Primary school
- SUDS measures
- Existing planting
- Proposed planting
- Primary streets
- Neighbourhood streets
- Gas pipeline
- Village street
- Nodes in street network

Rev - (27.04.16) Drawn: SD - Checked: KT

Status: For Information

Not to scale @ A3



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Figure 7



- a. Drem Village
- b. Drem Station
- c. New Main Street
- d. Peripheral Road
- e. Primary School and Nursery
- f. The Village Square...containing...
  - 1. General Store
  - 2. Café
  - 3. Business or Retail Units
- g. The Village Green...containing...
  - 4. Pub
  - 5. Community Pavilion
  - 6. Formal Multi Games Area
  - 7. Seating
- h. Park and Ride
- i. Villas on the Green
- j. Courtyard Neighbourhood
- k. Mews Lane & Home-zone
- l. Wetland and Water Treatment Facility
- m. Bio-diversity Corridor
- n. Play Space
- o. Countryside Edge
- p. Entrance to Muirton Farm
- q. Potential relocation of Drem station





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## Annex 3: Survey Form

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## BUSINESS SURVEY FORM

A survey has been commissioned by DC Watson & Sons (Fenton Barns) Ltd and Wallace Land Investments to record current and future information about businesses located at Fenton Barns, East Lothian.

<b>Business name:</b>	<b>Date established at Fenton Barns:</b>
<b>Business type:</b>	
<b>Contact name:</b>	<b>Position:</b>
<b>Business address:</b>	<b>Telephone:</b>
	<b>Email:</b>

<b>Current number of employees in your business?</b>				
<b>Full time staff:</b>	<b>Part time staff:</b>	<b>Total:</b>		
<b>How much floor space does your business currently require?</b>				
<b>Where do you see your business in 5 years' time in terms of employment?</b>				
<b>Full time staff:</b>	<b>Part time staff:</b>	<b>Total:</b>		
<b>Floor Space:</b>				
<b>If you are looking to expand, would you stay at Fenton Barns?</b>	<b>Yes:</b>		<b>No:</b>	
<b>Reason for your answer:</b>				
<b>Does the business owner reside in East Lothian?</b>	<b>Yes:</b>		<b>No:</b>	
<b>Do you rent or own your business premises?</b>	<b>Tenant:</b>		<b>Owner:</b>	

<b>Please return this form to:</b>  Bob Salter Geddes Consulting The Quadrant 17 Bernard Street Edinburgh EH6 6PW	<b>You can also email any information to:</b>  Bob@geddesconsulting.com
--	---

Please highlight the location of your business premises at Fenton Barns, East Lothian.

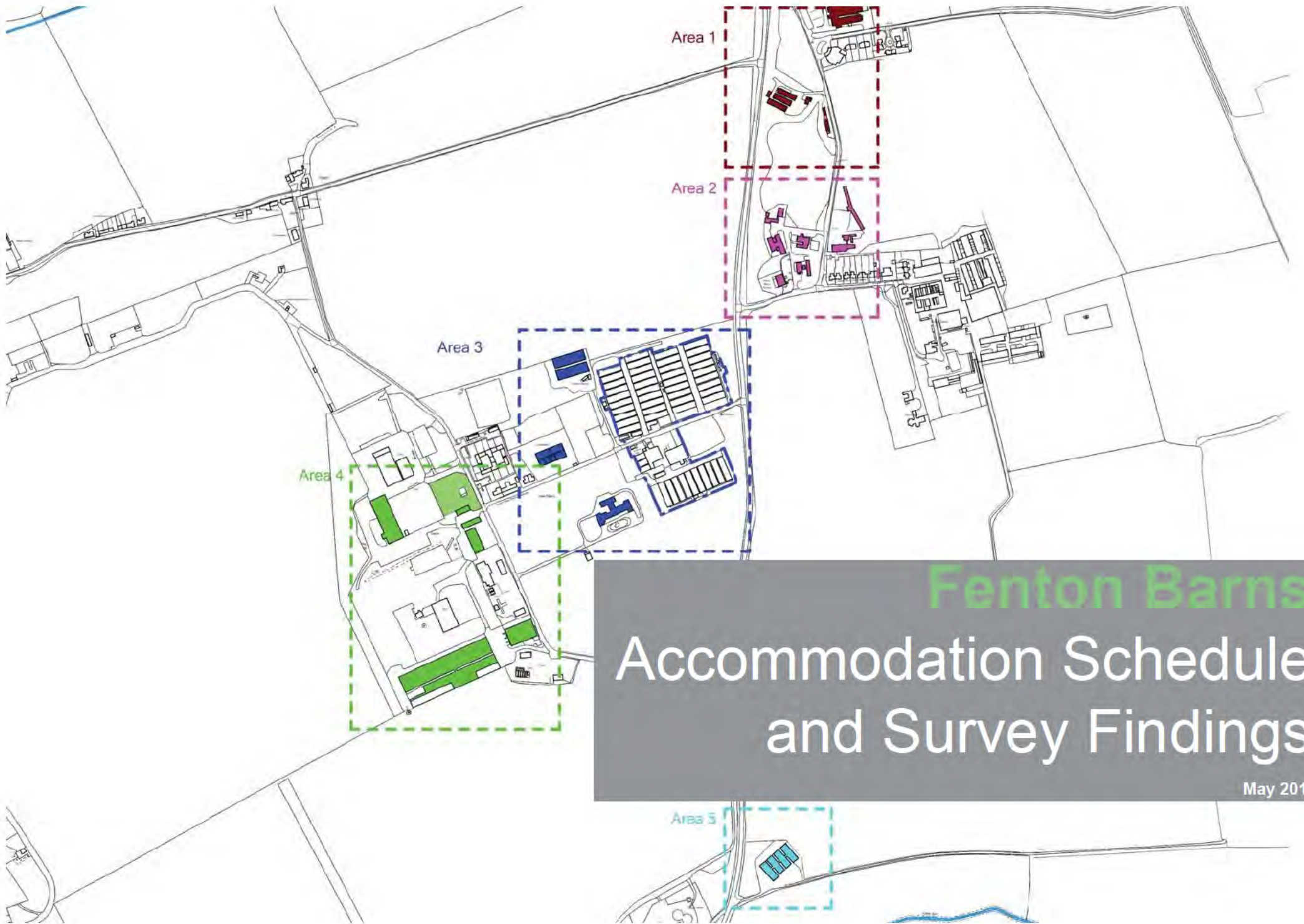


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## Annex 4: Accommodation Schedule

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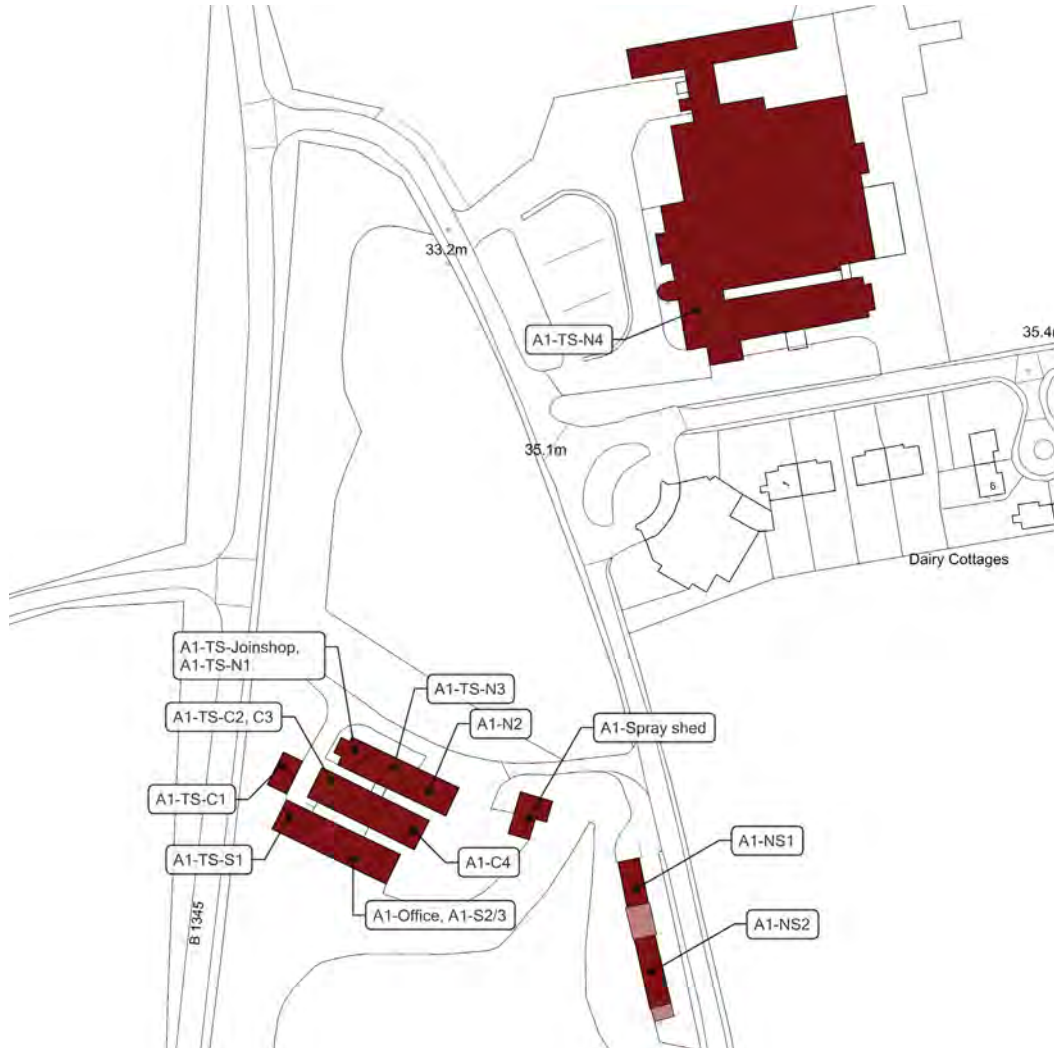




# Fenton Barns Accommodation Schedule and Survey Findings

May 2016

Accommodation Schedule for businesses at Fenton Barns  
 (refer to Drwg: 14024-STEM-P005 Accommodation Schedule - Area 1)



A1-Spray shed - Glass / Pottery workshop



A1-N2 - Furniture store



A1-C4 - Furniture shop



A1-S2/3 - Furniture manufacture



A1-NS1 - Stoves & More



A1-NS2 - Car restoration and sales



A1-TS-S1



A1-TS-C2 / C3



A1-TS-N1

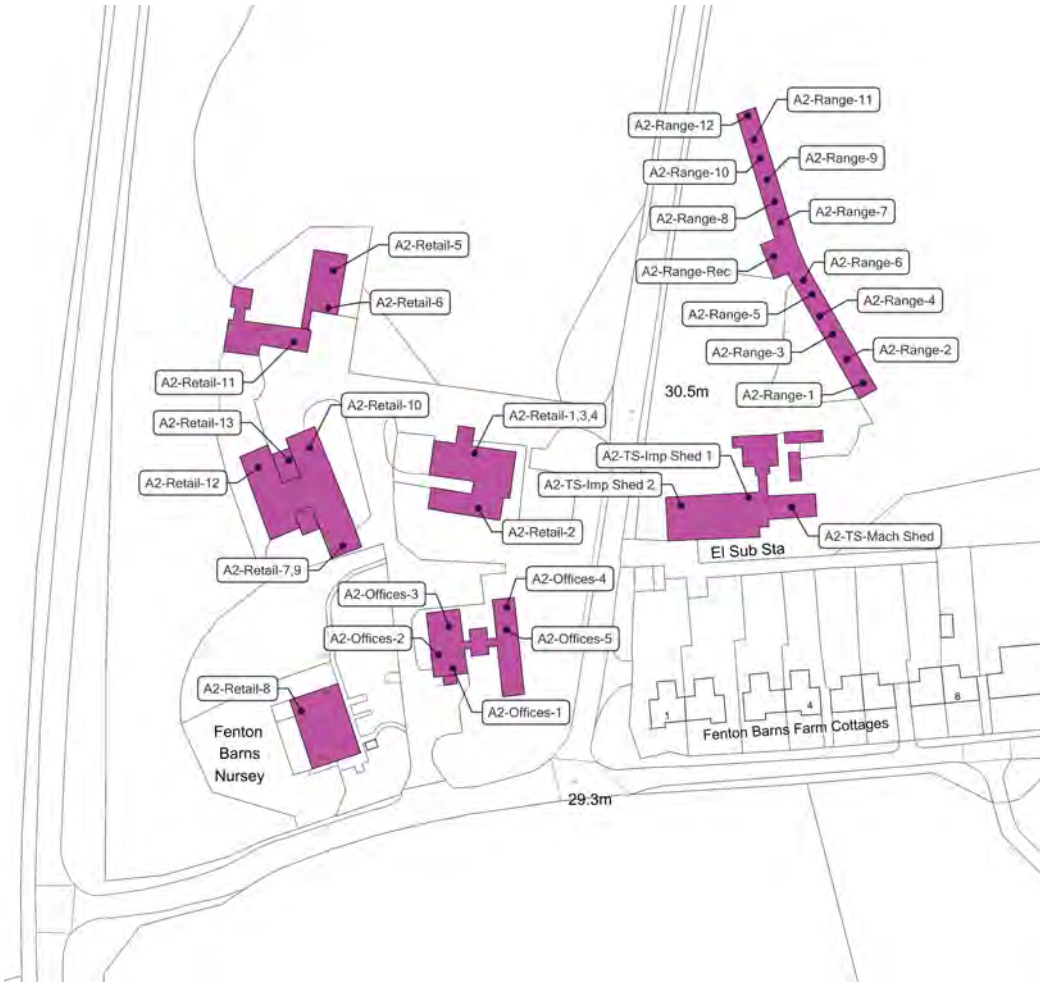


A1-TS-N3



Ref	Tenant	Business Type	Duration (years)	Floorspace (sq ft)	Future space required (sq ft)	2016 staff		2021 staff		Remain at Fenton Barns	Owner live locally
						FT	PT	FT	PT		
A1-Office	Old Pines & Pieces	Furniture manufacture	01/08/12	450	2,850	1	1	1	1	No	Yes
A1-S2/3	Old Pines & Pieces	Furniture manufacture	01/09/11	2,400							
A1-Spray shed	Kiln and Cutter	Glass / Pottery workshop	01/12/97	920	920	1	0	4	0	Yes	Yes
A1-C4	Linton Country Furniture	Furniture shop	01/08/11	1,300	2,800	1	2	2	0	Yes	Yes
A1- N2	Linton Country Furniture	Furniture store	01/06/11	1,200							
A1-NS1	Stoves & More	Stoves	-	-	-	-	-	-	-	-	-
A1-NS2	-	-	-	-	-	-	-	-	-	-	-
A1-TS-Join-shop	Johnston, Charles	Signwriter	01/03/14	1,150	2,700	2	1	2	1	Yes	Yes
A1-TS-N1	Johnston, Charles	Signwriter	01/08/11	1,200							
A1-TS-S1	Milligan, R	Car repairs	01/02/95	1,020	1,020	-	-	-	-	-	-
A1-TS-C1	Prigmore, Steven	Signwriter	01/04/16	280	280	-	-	-	-	-	-
A1-TS-C2	Galbraith, Callum	Storage	01/07/15	300	786	-	-	-	-	-	-
A1-TS-C3	Galbraith, Callum	Storage	01/07/15	486							
A1-TS-N3	Gorin, Neil	Toy Shop	01/06/09	900	900	-	-	-	-	-	-
A1-TS-N4	Browns Food Group	Meat processing	-	40,400	40,400	-	-	-	-	-	-
<b>TOTAL</b>	<b>10 businesses</b>	<b>Various</b>	<b>Various</b>	<b>52,006</b>	<b>52,656</b>	<b>5</b>	<b>4</b>	<b>9</b>	<b>2</b>	<b>-</b>	<b>-</b>

Accommodation Schedule for businesses at Fenton Barns  
 (refer to Drwg: 14024-STEX-P006 Accommodation Schedule - Area 2)



A2-Range-Rec -



A2-Range-1 -



A2-Range-2 -



A2-Range-3 -



A2-Range-4 -



A2-Range-5 -



A2-Range-6 -



A2-Range-7 -



A2-Range-8 -



A2-Range-9 -





A2-Range-10 -



A2-Range-11 -



A2-Range-12 -



A2-Offices-1 -



A2-Offices-2 -



A2-Offices-3 -



A2-Offices-4 -



A2-Offices-5 -



A2-Retail-1 -



A2-Retail-2 -



A2-Retail-3 -



A2-Retail-4 -



A2-Retail-5 -



A2-Retail-6 -



A2-Retail-7 -



A2-Retail-8 -





A2-Retail-9 -



A2-Retail-10 -



A2-Retail-11 -



A2-Retail-12 -



A2-Retail-13 -



A2-TS-Imp Shed 1 -



A2-TS-Imp Shed 2 -



A2-TS-Mach Shed -

Ref	Tenant	Business Type	Duration (years)	Floorspace (sq ft)	Future space required (sq ft)	2016 staff		2021 staff		Remain at Fenton Barns	Owner live locally
						FT	PT	FT	PT		
A2-Range-Rec	BJD Design Ltd	Cashmere Outlet	01/06/11	1,180	1,180	-	-	-	-	-	-
A2-Range-1	Spitfire Consultancy	Spit roasts	02/03/15	460	460	-	-	-	-	-	-
A2-Range-2	Patterson, Brian	Storage	01/08/14	460	460	-	-	-	-	-	-
A2-Range-3	Shiell, Glenn	Storage	01/05/15	460	460	-	-	-	-	-	-
A2-Range-4	Stevens, Steve	Store	01/06/15	460	460	-	-	-	-	-	-
A2-Range-5	Gannon, Brian	Store	01/06/11	460	460	-	-	-	-	-	-
A2-Range-6	BJD Design Ltd	Cashmere Outlet	01/11/13	460	460	-	-	-	-	-	-
A2-Range-7	BJD Design Ltd	Cashmere Outlet	01/06/11	460		-	-	-	-	-	-
A2-Range-8	Williamson, Aannan	Storage	23/01/15	460	460	-	-	-	-	-	-
A2-Range-9	Crooks, Tommy	Edinburgh Soap Company	09/07/12	460	460	-	-	-	-	-	-
A2-Range-10	Crooks, Tommy	Edinburgh Soap Company	01/04/15	460	460	-	-	-	-	-	-
A2-Range-11	Munro, Graeme	Storage	26/08/14	460	460	-	-	-	-	-	-
A2-Range-12	Ward, Jamie	Storage	01/07/13	460	460	-	-	-	-	-	Yes
A2-Offices-1	Silver Teal Cooks	Recruitment	01/01/05	120	360	1	0	1	2	Yes	Yes
A2-Offices-2	Bellamy, Andrew	Technical engineer	14/02/15	120	120	-	-	-	-	-	-

Ref	Tenant	Business Type	Duration (years)	Floorspace (sq ft)	Future space required (sq ft)	2016 staff		2021 staff		Remain at Fenton Barns	Owner live locally
						FT	PT	FT	PT		
A2-Offices-3	McElhinney, Marc	Renewables	01/08/14	240	240	-	-	-	-	-	-
A2-Offices-4	Whitelaw Wells	Accountant	01/04/11	240	360	1	0	2	0	Yes	Yes
A2-Offices-5	Whitelaw Wells	Accountant	01/12/12	120							
A2-Retail-1	Glenfinlas	Farm Shop	01/09/06	1,539	3,539	4	10	4	10	Yes	Yes
A2-Retail-3	Glenfinlas	Coffee Shop	01/09/06	750							
A2-Retail-4	Glenfinlas	Coffee Shop	01/09/06	900							
A2-Retail-2	Anderson, Stuart	Kitchens	01/04/12	1,116	1,116	-	-	-	-	-	-
A2-Retail-5	Ward, Jamie	Printing	12/06/15	700	700	1	1	-	-	-	Yes
A2-Retail-6	Bewsey, Patricia Design	Screen Printing	01/08/01	845	845	-	-	-	-	-	-
A2-Retail-8	Fenton Barns Nursery	Children's Nursery	01/05/15	504	675	21	3	25	4	Yes	Yes
A2-Retail-7	Milligan, Keith	Antique Shop	01/03/15	432	2,668	1	1	2	3	Yes	Yes
A2-Retail-9	Milligan, Keith	Antique Shop	01/05/15	2,236							
A2-Retail-10	Grahame, Margaret	Interior fabrics	01/06/15	1,260	1,260	1	4	1	7	Yes	Yes
A2-Retail-11	Boston, Kirsten	Picture framing	01/04/12	1,950	1,950	2	2	3	3	Yes	Yes
A2-Retail-12	Brattisani, Charles	Antique Shop	11/05/09	1,134	1,134	-	-	-	-	-	-
A2-Retail-13	Frame, Jamie	Upholsterer	01/07/14	965	965	1	0	1	0	Yes	Yes
A2-TS-Imp Shed 1	Souness, Yvonne	Bathroom Showroom	01/05/08	1,860	5,120	4	0	4	0	Yes	Yes
A2-TS-Mach Shed	Souness, Yvonne	Bathroom Store	01/05/08	700							
A2-TS-Imp Shed 2	Cochrane, George	Carpet Showroom	01/10/02	1,845	3,690	10	0	10	0	Yes	Yes
<b>TOTAL</b>	<b>28 business units</b>	<b>Various</b>	<b>Various</b>	<b>25,816</b>	<b>30,982</b>	<b>47</b>	<b>21</b>	<b>53</b>	<b>29</b>	<b>-</b>	<b>-</b>



Accommodation Schedule for businesses at Fenton Barns  
 (refer to Drwg: 14024-STEX-P007 Accommodation Schedule - Area 3)



A3-TT1 -



A3-TT2 -



A3-TT3 -



A3-TT4 -



A3-TT5 -



A3-TT6 -



A3-OM-B/C -



A3-OM-A -



A3-OM-D -



A3-OM-E -





A3-OM-F/E -



A3-OM-F/W -



A3-OM-Yard -



A3-Combine -



A3-Decca-1/1 -



A3-Decca-1/2 -



A3-Decca-1/3A -



A3-Decca-1/3 -



A3-Decca-1/4 -



A3-Decca-1/5 -



A3-Decca-1/6 -



A3-Decca-2/1 -



A3-Decca-2/2 -



A3-Decca-2/3 -



A3-Decca-2/4 -



A3-Decca-2/5 -



A3-Decca-2/6 -



A3-Decca-2/7 -

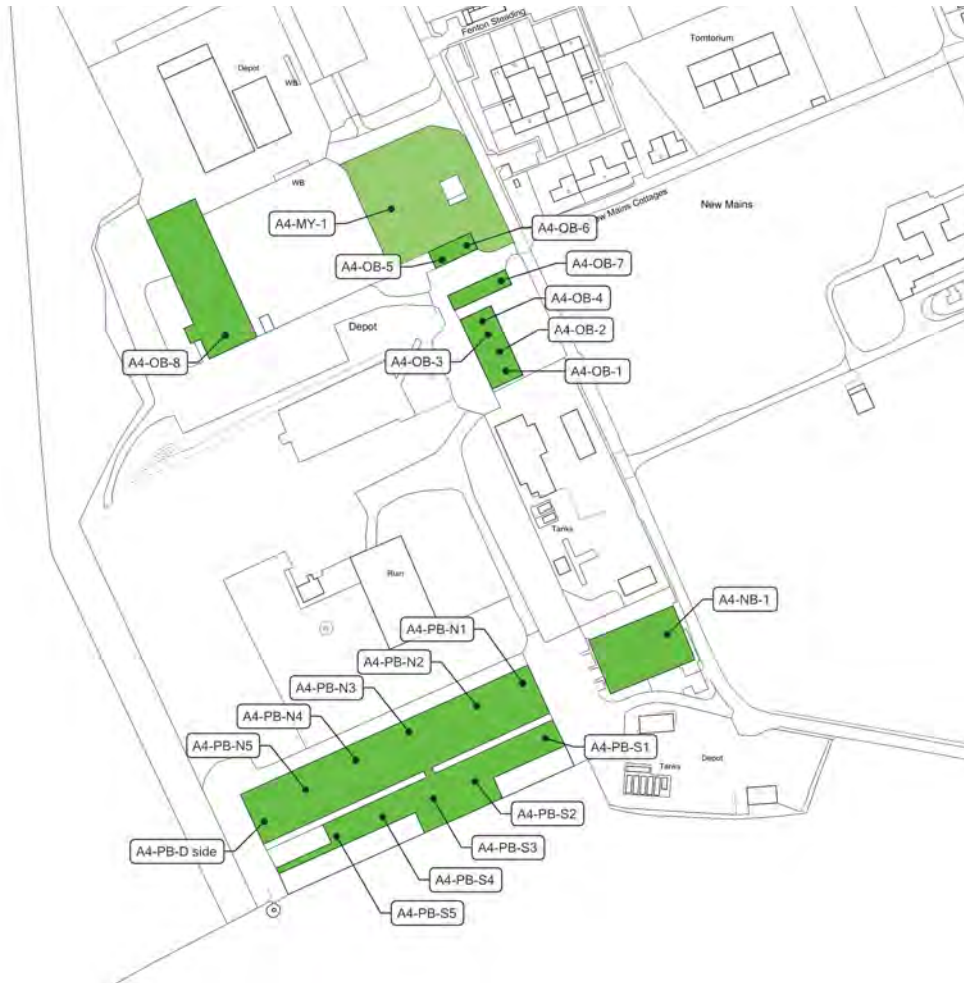


A3-Mushroom

Ref	Tenant	Business Type	Duration (years)	Floorspace (sq ft)	Future space required (sq ft)	2016 staff		2021 staff		Remain at Fenton Barns	Owner live locally
						FT	PT	FT	PT		
A3-TT1	Douglas, Euan	Store	01/01/14	3,116	3,116	-	-	-	-	-	-
A3-TT2	Hutcheon, David	Cars	01/03/14	2,850	8,550	1	1	2	2	Yes	Yes
A3-TT3	Plume, M	Sound Engineer	01/01/14	1,235	1,235	-	-	-	-	-	-
A3-TT4	Valius, Jonas	Distribution	01/01/14	1,216	1,216	-	-	-	-	-	-
A3-TT5	Ward, Jamie	Storage	01/01/14	1,216	1,216	-	-	-	-	Yes	Yes
A3-TT6	A1 Classic Cars - TT	Car restoration/sales	01/02/14	2,242	2,242	-	-	-	-	-	-
A3-OM-BC	Edin Preserves	Chutney/Jam/Fancy Goods	01/02/10	3,910	10,950	2	0	2	0	Yes	Yes
A3-OM-A	Edin Preserves	Chutney/Jam/Fancy Goods	01/02/10	2,150							
A3-OM-D	Edin Preserves	Chutney/Jam/Fancy Goods	01/02/10	2,180							
A3-OM-E	Kazmyrczuk, Greg	Repairs cars	01/09/11	970	970	-	-	-	-	-	-
A3-OM-F/E	Campbell, Gary	Repairs cars	01/01/10	1,350	1,350	-	-	-	-	-	-
A3-OM-F/W	Ramsay, Martin	Repairs cars	01/04/09	1,500	1,500	-	-	-	-	-	-
A3-OM-Yard	-	-	-	-	-	-	-	-	-	-	-
A3-Combine	Dewar, Donald	Store Bus	01/03/99	1,500	1,500	-	-	-	-	-	-
A3-Decca-1/1	McGuinness, Hugh	Car repairs	01/03/16	1,000	1,000	2	0	2	0	Yes	No
A3-Decca-1/2	White, Stuart	Dental Technician	01/10/10	1,000	1,000	1	1	1	1	Yes	Yes
A3-Decca-1/3A	Grieve, Steven	Gardening & Turfcare	01/11/15	1,150	1,150	-	-	-	-	-	-
A3-Decca-1/3	Rollo, Sean	Joiner	01/11/15	760	760	-	-	-	-	-	-
A3-Decca-1/4	Edinburgh Workshop Ltd	Furniture	01/11/12	2,000	4,000	4	0	8	2	Yes	No
A3-Decca-1/5	Burns, Paul	Storage	01/11/14	1,000	1,000	-	-	-	-	-	-
A3-Decca-1/6	Pollock, Colin	Joinery	01/06/15	1,000	1,000	-	-	-	-	-	-
A3-Decca-2/1	Baxter, Ross	Baker	01/04/14	1,000	1,000	-	-	-	-	-	-
A3-Decca-2/2	Gadek, Pawel	Storage	16/08/14	1,000	1,000	-	-	-	-	-	-
A3-Decca-2/3				2,000	2,000	-	-	-	-	-	-
A3-Decca-2/4	Campbell, Steven	Car Sales	01/02/14	1,150	1,150	-	-	-	-	-	-
A3-Decca-2/5	Calletta Dev Ltd	Storage	01/11/13	760	760	-	-	-	-	-	-
A3-Decca-2/6	Hopkinson, D	Joiner	01/12/13	1,000	1,000	-	-	-	-	-	-
A3-Decca-2/7	Niven, Connor	Storage	01/03/13	1,000	1,000	-	-	-	-	-	-
A3-Mushroom	Monaghan Mushrooms	Mushroom Processing	1987	205,000	256,250	275	0	300	0	Yes	No
<b>TOTAL</b>	<b>27 business Units</b>	<b>Various</b>	<b>Various</b>	<b>246,255</b>	<b>302,215</b>	<b>285</b>	<b>2</b>	<b>315</b>	<b>5</b>	<b>-</b>	<b>-</b>



Accommodation Schedule for businesses at Fenton Barns  
 (refer to Drwg: 14024-STEX-P008 Accommodation Schedule - Area 4)



A4-PB-N1 -



A4-PB-N2 -



A4-PB-N3 -



A4-PB-N4 -



A4-PB-N5 -



A4-PB-D Side -



A4-PB-S1 -



A4-PB-S2 -



A4-PB-S3 -



A4-PB-S4 -



Ref	Tenant	Business Type	Duration (years)	Floorspace (sq ft)	Future space required (sq ft)	2016 staff		2021 staff		Remain at Fenton Barns	Owner live locally
						FT	PT	FT	PT		
A4-PB-N1	Brown, Antony	Storage unit	15/10/11	1,200	1,200	-	-	-	-	-	-
A4-PB-N2	McIntosh, Margaret	Storage unit	01/03/15	1,200	1,200	-	-	-	-	-	-
A4-PB-N3	Wilson, Joseph	Storage unit	01/10/10	1,200	1,200	-	-	-	-	-	-
A4-PB-N4	Finlay, John	Storage unit	25/04/15	1,200	1,200	-	-	-	-	-	-
A4-PB-N5	Cools of Gullane	Storage unit	01/08/15	1,200	1,200	-	-	-	-	-	-
A4-PB-D Side	Marshall, Alistair	Storage unit	01/01/11	1,350	1,350	-	-	-	-	-	-
A4-PB-S1	Brown, Melanie	Storage unit	14/11/11	1,200	1,200	-	-	-	-	-	-
A4-PB-S2	Wilson, William	Storage unit	25/04/15	1,200	1,200	-	-	-	-	-	-
A4-PB-S3	Anderson, Stuart	Storage unit	01/10/15	1,200	1,200	-	-	-	-	-	-
A4-PB-S4	Smith, Louise	Storage unit	01/06/13	1,200	1,200	-	-	-	-	-	-
A4-PB-S5	Anderson, Stuart	Storage unit	25/04/12	1,200	1,200	-	-	-	-	-	-
A4-OB-6	Robbie Reid	Furniture manufacturer	01/01/13	900	1,800	1	0	2	0	Yes	No
A4-OB-8	Andrew Black	Haulage / Distribution	-	78,000	78,000	-	-	-	-	-	-
A4-NB-1	Clock House Furniture	Furniture manufacturer	11/01/16	1,200	1,200	14	2	16	3	Yes	Yes
A4-MY-1	Morins Yard	Builders yard	-	-	-	-	-	-	-	-	-
<b>TOTAL</b>	<b>15 business units</b>	<b>Various</b>	<b>Various</b>	<b>13,350</b>	<b>13,350</b>	<b>15</b>	<b>2</b>	<b>18</b>	<b>3</b>	<b>-</b>	<b>-</b>



A4-PB-S5 -



A4-OB-1 -



A4-OB-2 -



A4-OB-3 -



A4-OB-4 -



A4-OB-5 -



A4-OB-6 -



A4-OB-7 -







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Revision	Status	Prepared	Checked	Date
Version 1	Draft	Shaun Doherty	Phil Mclean	28/04/16
Version 1	Final	Shaun Doherty	Phil Mclean	20/05/16





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**East Lothian Local Development Plan  
Assessment of the Housing Land Supply**

---

**On behalf of**



**November 2016**

Prepared by :



The Quadrant  
17 Bernard Street  
Leith  
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## Document Control and Approval

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## Contents

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<b>1.0</b>	<b>Introduction</b>	<b>1</b>
<b>2.0</b>	<b>Scottish Planning Policy and National Guidance</b>	<b>3</b>
<b>3.0</b>	<b>SESplan SDP</b>	<b>5</b>
<b>4.0</b>	<b>East Lothian Local Development Plan</b>	<b>7</b>
<b>5.0</b>	<b>Recommendations for Proposed Plan</b>	<b>12</b>

## 1.0 Introduction

- 1.1. There are issues regarding the methodology adopted by East Lothian Council (the Council) to define the housing supply target, housing land requirement and the programme of completions for the proposed allocations for the Local Development Plan (LDP). These issues need to be addressed by the Council prior to submission of the LDP to Examination.
- 1.2. This *Assessment of the Housing Land Supply* (the Assessment) examines the methodology and assumptions adopted in the LDP, as set out in the Technical Note 1 *Planning for Housing*.
- 1.3. The Council's proposed development strategy will not meet the requirements as set out by SESplan Strategic Development Plan (SDP) or Scottish Planning Policy (SPP) as well as the approved guidance in PAN 2/2010 *Affordable Housing and Housing Land Audits*.
- 1.4. The analysis in this Assessment confirms the proposed development strategy:
- assumes many of the proposed allocations will begin to be built in 2017/18, and this general assumption is not supported by Homes for Scotland;
  - does not identify the housing land requirement 10 years post adoption to 2028; and
  - the housing land requirement for the period to 2019 is not met in full.
- 1.5. This Assessment confirms that there is a shortfall in the scale of new housing allocations required in the LDP to meet the housing land requirement in full.
- 1.6. Further effective housing land releases are needed in support of the Council's proposed development strategy.
- 1.7. For the purposes of the LDP, Table HOU2 *Housing Land Requirement* should be replaced with the following tables below:

Table HOU2 Housing Land Requirement

Planning Periods	2009-2019	2019-2024	2024 - 2028
Housing Supply Target	6,250	3,800	1,910
Housing Land Requirement (20%)	7,500	4,560	2,292
Dwelling Completions (2009 to 2015)	2,038	0	0
Contribution from the Established Land Supply	2,670	2,143	0
Contribution from Future Windfall Sites	84	105	56
Loss of Supply to Dwelling Demolitions	-15	-8	-6
Contribution from Blindwells	0	291	388
<b>Sub-Total Housing Land Supply</b>	<b>4,777</b>	<b>2,531</b>	<b>444</b>
<b>Contribution required from New Allocations</b>	<b>2,723</b>	<b>2,029</b>	<b>1,848</b>
<b>Updated Contribution from New Allocations</b>	<b>790</b>	<b>3,725</b>	<b>1,485</b>
<b>Shortfall / Surplus</b>	<b>-1,933</b>	<b>+1,696</b>	<b>-364</b>



- 1.8. Further additional allocations are required to be allocated in the LDP. Overall, there is a shortfall of 601 homes over the timescale of the LDP from 2009 to 2028. However, in the period to 2019, a significant shortfall of 1,933 homes is expected to emerge.
- 1.9. The Council's proposed allocation of 7,285 homes is insufficient in terms of programming to meet the scale of allocation required. Further effective housing land capable of accommodating additional homes is required in the short term.
- 1.10. The consequence of failing to make these additional allocations is that the Council will not be maintaining a 5 year effective housing land supply from the adoption of the LDP. This will mean that the housing land supply policies in the LDP will be considered out of date in accord with SPP paragraph 125. In these circumstances, a presumption in favour of development that contributes to sustainable development will apply through the development management process as set out in SPP paragraphs 29 and 32 to 35.
- 1.11. Should the Council not identify additional allocations to maintain a 5 year effective housing land supply at all times from the point of adoption, a Hearing Session will be required as part of the Examination process to resolve matters.

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## 2.0 Scottish Planning Policy and National Guidance

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### Scottish Planning Policy

- 2.1 SPP (June 2014) sets out the policy requirements in paragraphs 109 to 125 for both development plans and development management for *Enabling the Delivery of New Homes*.
- 2.2 The policy principles which have a direct consequence on the Council's preferred development strategy and are summarised in SPP, paragraph 110:
- Policy Principles**
- 110. The planning system should:*
- *identify a generous supply of land for each housing market area within the plan area to support the achievement of the housing land requirement across all tenures, maintaining at least a 5-year supply of effective housing land at all times;*
  - *enable provision of a range of attractive, well-designed, energy efficient, good quality housing, contributing to the creation of successful and sustainable places; and*
  - *have a sharp focus on the delivery of allocated sites embedded in action programmes, informed by strong engagement with stakeholders.*
- 2.3 The delivery mechanism should include partnership working with a range of partners including the delivery sector such as Homes for Scotland as set out in paragraph 111.
- 2.4 LDPs should be based on a robust and credible HNDA. It should adopt the housing supply target based on evidence from the HNDA for both affordable and market sector housing. As paragraph 115 explains, this housing supply target is a policy view of the number of homes to be delivered over the development plan period but must properly reflect the HNDA estimate of housing demand and be supported by compelling evidence. The choice of the housing supply target should also be reflected in the local housing strategy.
- 2.5 In paragraph 116, the housing supply target will be based on the number of homes to be built in the plan period together with a margin of 10% to 20% to ensure a generous land supply is provided. The exact extent of the margin depends on local circumstances and requires a robust explanation. This then establishes the housing land requirement for the LDP.
- 2.6 The application of the 'generosity allowance' translates the housing supply target to the housing land requirement.
- 2.7 Sources of land supply to meet the housing land requirement are referred to in paragraph 117. These include the established land supply, proposed new allocations and a proportion of windfall development which can be justified.
- 2.8 This housing supply target should be set out as well as the housing land requirement up to year 10. This housing supply target should be met in full (paragraph 120). In addition beyond year 10 and up to year 20, the LDP should provide an indication of the possible scale and location of housing by local development plan area.
- 2.9 This process is helpfully set out in Diagram 1 on page 30 of SPP.

2.10 SPP requires planning authorities to maintain a 5 year effective land supply at all times, using the housing land audit process as a monitoring tool measure whether this requirement is being met (paragraph 123).

2.11 Where a shortfall in the 5 year effective land supply emerges, paragraph 125 sets out that development plan policies for the supply of housing land will not be considered up to date and reference to paragraphs 32 to 35 of SPP is made. This is a reference to the development management process and how the issue of prematurity is to be addressed with a presumption in favour of sustainable development.

### **National Guidance**

2.12 In considering the implications of these paragraphs set out in SPP, their interpretation needs to have regard for the existing guidance in PAN2/2010, specifically:

- factors which determine whether a site is effective or not (paragraph 55);
- restricting the proportion of effective land to be included to that which can be built in the plan period (paragraph 56); and
- assessing the amount of effective housing land using the housing land audit process (paragraph 57).

2.13 Further, Scottish Government's response to the Review of Planning indicated that Planning and Architecture Division (PAD) will be reducing their input to current development plans. A Service Standard was published on 16<sup>th</sup> August 2016 outlining how PAD will input to development plans from September 2016.

2.14 An accompanying note was prepared to aide Planning Authorities in preparing LDPs. On matters relating to *New Homes*, Scottish Government requires the following to be set out in the LDP:

- Plans should use the same terminology as used in the SPP;
- Plans should set out figures, preferably in a table, identifying:
  - HNDA estimates;
  - Housing Supply Target for each Housing Market Area. This should be separated into market and affordable sector;
  - The percentage of generosity, and a summary of the reason for this; and
  - The Housing Land Requirement.
- Plans should set out what approach would be taken where an annual Housing Land Audit indicates there is a shortfall in the 5 year effective housing land supply; and
- Plans should consider the level of affordable housing contribution which can realistically be delivered. The level of affordable housing required as a contribution should generally be no more than 25% of the total number of houses.

2.15 Accordingly, the LDP may require modification to take account of these matters prior to Examination.

## 3.0 SESplan SDP

3.1 In approving SESplan SDP, Scottish Ministers set out a requirement for Supplementary Guidance in respect of Policy 5 *Housing Land* to identify the housing land requirement to be met by the local development plans for the periods 2009 to 2019 and 2019 to 2024.

3.2 The Supplementary Guidance has now been approved by the Scottish Ministers subject to modification. The following sentence should be deleted from paragraph 3.13:

*Member authorities will base their calculation of the five year land supply on the period 2009 - 2024, taking into consideration housing completions.*

3.3 The SESplan Joint Committee considered the matter at its meeting on 30<sup>th</sup> June 2014 and recommended to the member authorities that the guidance be adopted with the modification

3.4 Policy 5 states 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 to 2019 and in the period 2019 to 2024.*

*...Subject to any justifiable allowance for anticipated house completions from 'windfall' sites, and for demolitions of existing housing stock, Local Development Plans will allocate sufficient land which is capable of becoming effective and delivering the scale of the housing requirements for each period, which will be confirmed in the supplementary guidance.*

*...Those existing housing sites which are assessed as being constrained, but also capable of delivering housing completions in the period 2024 to 2032, should be safeguarded for future housing development.*

3.5 It is clear from Policy 5 that the housing land requirement for East Lothian is as set out in the Supplementary Guidance.

3.6 The SDP and its Supplementary Guidance was approved under SPP (2010). SPP (2014) has now been published and requires a housing supply target to be identified.

3.7 The Examination of the Edinburgh Proposed Plan concluded that the housing land requirement as set out in the Supplementary Guidance is now the housing supply target. Appropriately, a generosity allowance of between 10 - 20% will be added to the target to provide a housing land requirement.

3.8 Therefore the housing supply target for East Lothian is set out in the table below:

Local Development Plan	2009-2019	2019-2024
East Lothian	6,250	3,800

Source: Supplementary Guidance, Table 3.1 Housing Land Requirement by Local Development Plan Area

3.9 For the period beyond 2024, the housing supply target is set out in the table below:

Local Development Plan	2024 - 2032
East Lothian	3,820

Source: Supplementary Guidance (Technical Note), Table 3.1 Estimate of Need and Demand for Housing



3.10 According to SPP (paragraph 115), the housing supply target for East Lothian is as follows:

Local Development Plan	2009-2019	2019-2024	2024 - 2032
East Lothian	6,250	3,800	3,820

Source: Supplementary Guidance

3.11 It can be concluded that the SDP has adopted the findings of the HNDA and therefore the housing supply target as set out in paragraph 115 of SPP. This housing supply target should now be adopted by the Council for Local Development Plan purposes subject to application of the generosity allowance.

3.12 According to the HNDA and the Supplementary Guidance, most of the need and demand will arise in the period to 2019. It is therefore imperative that the finalised development strategy in the adopted LDP is capable of releasing the scale of effective sites needed in the short term. There needs to be no doubt about the effectiveness of the allocated sites in the LDP to deliver at least 6,250 homes by 2019.

3.13 SESplan Policy 6 *Housing Land Flexibility* requires that:

*Each planning authority in the SESplan area shall maintain a five years' effective housing land supply at all times. The scale of this supply shall derive from the housing requirements for each Local Development Plan area identified through the supplementary guidance provided for by Policy 5. For this purpose planning authorities may grant planning permission for the earlier development of sites which are allocated or phased for a later period in the Local Development Plan.*

3.14 Each planning authority in the SESplan area shall maintain a five year effective housing land supply at all times otherwise the development plan policies about the supply of housing land will not be considered up to date (SPP, paragraph 125).

3.15 As set out in paragraph 119, SPP requires that the emerging LDP should allocate a range of sites which are effective or are expected to be effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected date of adoption.

3.16 Further, the development strategy proposed in the emerging LDP should provide for a minimum of a 5 year effective land supply at all times.

## 4.0 East Lothian Local Development Plan

### Setting the Housing Supply Target

- 4.1 The Council considers that SPP (2010), the SESplan Examination Report as well as the Supplementary Guidance do not require the housing land requirement set for East Lothian to be increased by a further generosity allowance of 10 – 20% in the preparation of the LDP (Technical Note 1, paragraph 4.1 to 4.6)..
- 4.2 This is contrary to the findings of the Edinburgh LDP Examination Report which supported the housing land requirement being defined as the housing supply target as well as a generosity allowance added to this figure.
- 4.3 The Council will note that this methodology has also been adopted in the Glasgow & the Clyde Valley SDP area for all adopted LDPs post SPP (2014).
- 4.4 In all instances, this methodology was considered appropriate given the passage of time from the approved SDP to the present.
- 4.5 The Council is also required to identify the housing supply target 10 year post adoption. With the expected date of adoption 2018, the Council is required to identify the housing supply target from 2024 to 2028, as well as the SESplan periods 2009 to 2019 and 2019 to 2024.
- 4.6 Using the evidence set out in the Supplementary Guidance, this equates to 1,910 homes from 2024 to 2028.
- 4.7 The housing supply target for East Lothian is set out in the table below:

Planning Periods	2009-2019	2019-2024	2024 - 2028
Housing Supply Target	6,250	3,800	1,910

- 4.8 Accordingly the Council's Table HOU2 *Housing Land Requirement* should be modified to reflect the outcomes set out in the table above.

### Setting the Housing Land Requirement

- 4.9 The housing supply target is set out in the Glossary for SPP which explains that *...it is the number of homes to be built.*
- 4.10 The housing land requirement is therefore the housing supply target **plus** a generosity allowance of between 10% and 20%. The purpose of identifying a housing land requirement is to allocate sufficient effective housing land to meet the housing supply target in full.
- 4.11 The Council has identified a generosity allowance of 23% over the period 2009 to 2024. However, this represents 10% in the first period, 2009 to 2019, and 43% in the second period, 2019 to 2024. It is noted that this was established by identifying a range of suitable land for housing and the generosity level was calculated thereafter. This is due to supply led approach to determining generosity.
- 4.12 At present, the Council's adopted methodology to select the generosity allowance of 23% in the LDP is **contrary** to the requirements SPP as well as recently published note by Scottish Government.

4.13 SPP expects that ...*the requirement for each housing market area* is met in full (paragraph 118). This is an **overall** housing requirement to be met in full.

4.14 The housing land requirement for the LDP adopting a generosity allowance of 20% is set out in the table below:

Planning Periods	2009-2019	2019-2024	2024 - 2028
Housing Land Requirement (20%)	7,500	4,560	2,292

4.15 Based on a generosity allowance of 20%, the housing land requirement to plan for is 7,500 homes from 2009 to 2019; 4,560 homes from 2019 to 2024 and 2,292 homes from 2024 to 2028.

4.16 Accordingly the Council's Table HOU2 *Housing Land Requirement* should be modified to reflect the outcomes set out in the table above.

#### Identifying the Contribution from Dwelling Completions

4.17 The Council has identified that there were 2,038 homes completed in the period from 2009 to 2015. This is set out in the table below:

Planning Periods	2015-2019	2019-2024	2024 - 2028
Dwelling Completions (2009 to 2015)	2,038	0	0

#### Identifying the Contribution from the Established Land Supply

4.18 As set out in the Technical Note 1, the Council considers that the 2015 Housing Land Audit provides the baseline for the contribution from the established land supply, including small sites.

4.19 The contribution from the established land supply for the LDP is set out in the table below:

Planning Periods	2015-2019	2019-2024	2024 - 2028
Contribution from the Established Land Supply	2,670	2,143	0

4.20 Based on the 2015 Housing Land Audit, the contribution from the established land supply is 2,670 homes from 2009 to 2019 and 2,143 homes from 2019 to 2024. There are no homes programmed from 2024 to 2028.

4.21 We note that 2016 Housing Land Audit will be agreed with Homes for Scotland and this should form the basis of the contribution from the established land supply for the LDP Examination.

4.22 Accordingly the Council's Table HOU2 *Housing Land Requirement* should be modified to reflect the outcomes set out in the table above.

#### Identifying the Contribution from Future Windfall Sites

4.23 The Council has identified a contribution of 299 homes from future windfall sites from 2009 to 2032.

4.24 The LDP is required only to identify a contribution to 2028 – 10 years post adoption.

4.25 It should be noted that as the baseline is the 2015 Housing Land Audit, windfall assumption will begin in 2015.

4.26 As set out in Technical Note 1 (paragraph A1.24), the contribution from Future Windfall Sites is set out in the table below:

Planning Periods	2015-2019	2019-2024	2024 - 2028
Contribution from Future Windfall Sites	84	105	56

4.27 The contribution from future windfall sites is 84 homes from 2009 to 2019; 105 homes from 2019 to 2024; and 56 homes from 2024 to 2028.

4.28 Accordingly the Council's Table HOU2 *Housing Land Requirement* should be modified to reflect the outcomes set out in the table above.

#### Loss of Supply to Dwelling Demolitions

4.29 The Council has identified a loss of 35 homes due to demolitions from 2009 to 2032.

4.30 The LDP is required only to identify a contribution to 2028 – 10 years post adoption.

4.31 As set out in Technical Note 1 (paragraph A1.31), the loss of supply from demolitions is set out in the table below:

Planning Periods	2015-2019	2019-2024	2024 - 2028
Loss of Supply to Dwelling Demolitions	15	8	6

4.32 The loss of supply to dwelling demolitions is 15 homes from 2009 to 2019; 8 homes from 2019 to 2024; and 6 homes from 2024 to 2028.

4.33 Accordingly the Council's Table HOU2 *Housing Land Requirement* should be modified to reflect the outcomes set out in the table above.

#### Contribution from Blindwells

4.34 The Council has separated Blindwells' contribution from established land supply. A programme of completions for Blindwells is set out in Technical Note 1 (Appendix 2).

4.35 The Council's expected contribution from Blindwells is set out in the table below:

Planning Periods	2015-2019	2019-2024	2024 - 2028
Contribution from Blindwells	0	291	388

4.36 We note that 2016 Housing Land Audit will be agreed with Homes for Scotland and this should form the basis of the contribution from the established land supply for the LDP Examination.

4.37 Accordingly the Council's Table HOU2 *Housing Land Requirement* should be modified to reflect the outcomes set out in the table above.

#### Identifying the Scale of Allocations Required

4.38 Based on a 20% generosity allowance, the process and information to identify the scale of allocations required for the East Lothian LDP is set out in the table below:

Planning Periods	2009-2019	2019-2024	2024 - 2028
Dwelling Completions (2009 to 2015)	2,038	0	0
Contribution from the Established Land Supply	2,670	2,143	0
Contribution from Future Windfall Sites	84	105	56
Loss of Supply to Dwelling Demolitions	15	8	6
Contribution from Blindwells	0	291	388



<b>Sub-Total Housing Land Supply</b>	<b>4,777</b>	<b>2,531</b>	<b>444</b>
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4.39 The total housing land supply is 4,777 homes from 2009 to 2019; 2,531 homes from 2019 to 2024; and 444 homes from 2024 to 2028.

4.40 Subtracting the total housing land supply from the housing land requirement will identify the scale of proposed allocations required for the LDP. This is set out in the table below:

Planning Periods	2009-2019	2019-2024	2024 - 2028
<b>Housing Land Requirement (20%)</b>	<b>7,500</b>	<b>4,560</b>	<b>2,292</b>
<b>Sub-Total Housing Land Supply</b>	<b>4,777</b>	<b>2,531</b>	<b>444</b>
<b>Contribution required from New Allocations</b>	<b>2,723</b>	<b>2,029</b>	<b>1,848</b>

4.41 The contribution required from new allocations is 2,723 homes from 2009 to 2019; 2,029 homes from 2019 to 2024; and 1,848 homes from 2024 to 2028.

4.42 Comparing these figures with the Council's contribution set out in Table HOU2 *Housing Land Requirement*, additional allocations will be required. This is set out in the table below:

Planning Periods	2009-2019	2019-2024	2024 - 2028
<b>Contribution required from New Allocations</b>	<b>2,723</b>	<b>2,029</b>	<b>1,848</b>
<b>Council's Contribution</b>	<b>2,115</b>	<b>2,906</b>	<b>1,204</b>
<b>Shortfall / Surplus</b>	<b>-608</b>	<b>+877</b>	<b>-644</b>

4.43 The total additional allocations required to be allocated in the LDP is 608 homes over the period to 2019, with a further 644 homes required in the period beyond 2024.

4.44 Over the whole time period of the LDP from 2009 to 2028, there is a shortfall of 375 homes.

4.45 The Council's proposed allocations are therefore insufficient to meet the scale of allocations required. This Assessment confirms that an additional 608 homes are required over the LDP period to 2019.

*Identifying the Programming of Proposed Allocations*

4.46 The Council is encouraging proposed allocations to be determined in advance of adoption of the LDP. It is noted that the Council has programmed many of the proposed allocations to begin on site in 2017/18. This is optimistic and unrealistic.

4.47 Technical Note 1 (Appendix 1 and 2) should amend the programming of proposed allocations to begin in 2018/19 rather than 17/18. This would be appropriate to house builders and Homes for Scotland.

4.48 The resultant effect of this movement on the programming in Table HOU2 *Housing Land Requirement* is set out in the table below:

Planning Periods	2009-2019	2019-2024	2024 - 2028
<b>Contribution from New Allocations</b>	<b>790</b>	<b>3,725</b>	<b>1,485</b>

4.49 The updated contribution from new allocations is 790 homes from 2009 to 2019; 3,725 homes from 2019 to 2024; and 1,485 homes from 2024 to 2028.

4.50 Comparing the contribution required with this updated Council's contribution, additional allocations will be required. This is set out in the table below

Planning Periods	2009-2019	2019-2024	2024 - 2028
Contribution required from New Allocations	2,723	2,029	1,848
Updated Council's Contribution	790	3,725	1,485
Shortfall / Surplus	-1,933	+1,696	-364

4.51 The total additional allocations required to be allocated in the LDP is 1,933 homes over the period to 2019, with a further 364 homes required in the period beyond 2024.

4.52 Over the whole time period of the LPD from 2009 to 2028, there is a shortfall of 601 homes.

4.53 The Council's proposed allocations are therefore insufficient to meet the housing land requirement in full. This Assessment confirms that an additional 1,933 homes are required over the LDP period to 2019.

4.54 Accordingly the Council's Table HOU2 *Housing Land Requirement* should be modified to reflect the outcomes set out in the table above.

#### **Draft 2016 Housing Land Audit**

4.55 The draft 2016 Housing Land Audit has to be agreed with Homes for Scotland.

4.56 Subject to commentary from Homes for Scotland, the adopted 2016 Housing Land Audit will form the basis for the LDP Examination.

## 5.0 Recommendations for Proposed Plan

- 5.1 The Council's proposed development strategy as set out in the LDP does not comply with the requirements of SPP.
- 5.2 The methodology for identifying the scale of allocations required to meet the housing land requirement in full is incorrect.
- 5.3 For the purposes of the LDP, Table HOU2 *Housing Land Requirement* should be replaced with the following tables below:

Table HOU2 *Housing Land Requirement*

Planning Periods	2009-2019	2019-2024	2024 - 2028
Housing Supply Target	6,250	3,800	1,910
Housing Land Requirement (20%)	7,500	4,560	2,292
Dwelling Completions (2009 to 2015)	2,038	0	0
Contribution from the Established Land Supply	2,670	2,143	0
Contribution from Future Windfall Sites	84	105	56
Loss of Supply to Dwelling Demolitions	-15	-8	-6
Contribution from Blindwells	0	291	388
<b>Sub-Total Housing Land Supply</b>	<b>4,777</b>	<b>2,531</b>	<b>444</b>
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<b>Shortfall / Surplus</b>	<b>-1,933</b>	<b>+1,696</b>	<b>-364</b>

- 5.4 The total additional allocations required to be allocated in the LDP is 601 homes over the total plan period from 2009 to 2028. In the period to 2019, a shortfall of 1,933 homes is expected to emerge.
- 5.5 The Council's proposed allocation of 7,285 homes is insufficient to meet the scale of allocations required. Further effective housing land capable of accommodating additional homes is required in the short term.
- 5.6 The consequence of failing to make these additional allocations is that the Council will not be maintaining a 5 year effective housing land supply from the adoption of the LDP. This will mean that the housing land supply policies in the LDP will be considered out of date in accord with SPP paragraph 125. In these circumstances a presumption in favour of development that contributes to sustainable development will apply through the development management process as set out in SPP paragraphs 29 and 32 to 35.
- 5.7 Should the Council not identify additional allocations to maintain a 5 year effective housing land supply at all times from the point of adoption, a Hearing Session will be required as part of the Examination process to resolve matters.

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## Fenton Barns, Statement of Site Effectiveness

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### Introduction

Scottish Government now specifically requires local authorities to ensure that sites allocated in Local Development Plans are effective and can contribute completions during the development plan period. An effective housing site can finance necessary infrastructure costs. An effective housing land supply delivers a viable LDP.

The overall level of programmed annual completions from all sites in the effective land supply need to be sufficient to maintain a 5 year effective land supply at all times and so meet the identified housing requirement in the approved development plan, as well as meeting the shortfall identified by the assessment of housing need and demand in the Local Housing Strategy.

These policy requirements are set by Scottish Government in Scottish Planning Policy (SPP). A council now needs to be satisfied through its own appraisal that an allocated site is effective in order to comply with the Strategic Development Plan, following the guidelines set out by Scottish Government in PAN 2/2010 *Affordable Housing and Housing Land Audits*.

There is an expectation that all sites to be allocated in the LDP will be subject to testing by the Council and a conclusion reached as to the overall construction period (taking account of the developer's or house builder's lead-in period). This construction timeframe would then define the annual rate of completions expected. Currently, most house builders expect to deliver a house sale rate of 2 to 3 homes per month or between 24 and 36 sales per annum. Affordable housing requirements would be in addition to this but certainly provided before the development is completed.

PAN 2/2010 includes a series of criteria to test the effectiveness of individual sites. This guidance is used to assess whether a site or portion of a site is effective. By applying the tests of effectiveness in this guidance, it can be demonstrated that within the 10 year period of LDP under consideration, the site is capable of development for housing, being free of potential site constraints as set out in PAN 2/2010.

### Outcome

Based on the appraisal of the criteria in PAN 2/2010, the proposal at Fenton Barns by Wallace Land Investments (Wallace) for around 1000 homes is an immediately effective site. This Statement explains how the proposal meets the tests of effectiveness in PAN 2/2010.

The proposal will be developed over a 15 year period from 2018. This will include private sales by two house builders, together with the building of affordable homes during this period.



## Appraisal

This conclusion is based on the following analysis.

Criteria	Response	Comment
<p><b>Ownership:</b> the site is in the ownership or control of a party which can be expected to develop it or to release it for development. Where a site is in the ownership of a local authority or other public body, it should be included only where it is part of a programme of land disposal.</p>	<p>The site is being promoted by of Wallace Land Investments (Wallace) and DC Watson &amp; Sons (Fenton Barns) Ltd. It is immediately available for development.</p> <p>Construction will start once all relevant planning and other consents are secured which can be delivered by 2018/19 onwards, if the site is allocated in the proposed plan in 2017.</p>	<p><b>Complies</b></p>
<p><b>Physical:</b> the site, or relevant part of it, is free from constraints related to slope, aspect, flood risk, ground stability or vehicular access which would preclude its development. Where there is a solid commitment to removing the constraints in time to allow development in the period under consideration, or the market is strong enough to fund the remedial work required, the site should be included in the effective land supply.</p>	<p>Adverse development factors give rise to abnormal development costs which can affect the viability of a site and hence its effectiveness.</p> <p>Appraisals of the site have been carried out to establish whether there are any constraints to development and what measures are necessary to enable development on the site. These appraisals also determine whether the site is viable for future development.</p> <p>The following assessments will be undertaken relating to the physical aspects of the site's future development:</p> <ul style="list-style-type: none"> <li>• Engineering Assessment with Drainage Report, and Flood Risk Assessment;</li> <li>• Transport Assessment;</li> <li>• Desk-based Cultural Heritage Assessment;</li> <li>• Arboricultural Assessment;</li> <li>• Impact on Setting of Listed Buildings Assessment;</li> <li>• Ecological Assessment;</li> <li>• Landscape and Visual Impact Assessment;</li> <li>• Air Quality Impact Assessment;</li> <li>• Ground Conditions Assessment</li> </ul>	<p><b>Complies</b></p>

- Environmental Noise Impact Assessment.

The following comments are highlighted:

- The topography of the site can accommodate the necessary gradients and development platforms for the proposal without extensive ground modelling.
- The development area is not subject to fluvial flooding. Very small areas of the site may be susceptible to pluvial flooding and will be resolved through the implementation of the proposed SuDS measures. A number of detention basins are proposed throughout the site, which will regulate water discharge.
- The site can accommodate the scale of development proposed. The site is well connected with vehicular access into the site available from the B1345. The B1345 runs through the site and provides access to North Berwick and also leads to Drem to the south, beyond which the A6137 leads to Haddington where it is possible to connect to the A1.
- The proposal will take account of the existing Listed Buildings and their setting. These buildings will provide an influence on the design character of the parts of the proposal. Mitigation measures will be introduced to ensure that the setting on all designated sites is not affected. A comprehensive archaeological investigation will be carried out for the site, in accord with Council requirements.
- The site comprises prime quality agricultural land falling with Classes 1, 2 and 3.1. However, the proposal also incorporates the re-use of previously developed land, minimising the use of agricultural land needed.
- Pink-footed Geese are the main ecological consideration in the area but preliminary surveys have identified that there are no key fields for the wintering of the Pink-footed Geese within the site. Avoiding disturbance to Pink-footed geese will be taken into account through new landscape screening between the development and the key fields some distance away. The greenfield part of the site comprises a series of agricultural fields which are of lesser significance. Existing hedges and field margins have biodiversity opportunities and will be retained, wherever possible. Greenspace proposals along with the introduction of gardens will enhance the biodiversity of the site.
- The site has the landscape capacity to accommodate development without significant adverse impacts.

	<p>The proposal works with the topography of the site, containing development within the shallow valley of the Peffer Burn. The location is already subject to the large industrial buildings associated with economic activities at Fenton Barns. Many of the existing buildings relate to the site's historical use as an airfield for some considerable time. These buildings are seen on the ridgeline which is exposed to the north and the coastal settlements. Further development will be behind these existing buildings.</p> <p>There are no physical constraints on this site to either prevent development in accordance with the proposed Indicative Development Framework or require engineering works which will generate unacceptable abnormal costs.</p> <p>Fenton Barns is a long established area of industry, employment and residential uses with its own separate identity. The allocation of a new settlement with further housing at Fenton Barns has a key role to play in delivery of the spatial strategy and future rural economic development in this part of East Lothian, as required by SPP. This new settlement is located in the East Lothian SDA and accords with the development strategy in SESplan.</p>	
<p><b>Contamination:</b> previous use has not resulted in contamination of the site or, if it has, commitments have been made which would allow it to be developed to provide marketable housing.</p>	<p>The site is in arable agricultural use and is a greenfield site. Most of the site is prime agricultural land.</p> <p>The proposal also incorporates the re-use of previously developed land, minimising the use of agricultural land needed. Accordingly, the proposal complies with the requirements of SPP.</p> <p>It is anticipated that there may be some areas of contaminated land within the site, due to its previous military use. Development of the site provides the opportunity to remediate this. All necessary ground condition assessments will be carried out and any required mitigation implemented prior to development of the site.</p>	<p><b>Complies</b></p>

<p><b>Deficit Funding:</b> any public funding required to make residential development economically viable is committed by the public bodies concerned;</p>	<p>Wallace is promoting the development of this site for new homes, a primary school, additional shops and businesses. The development principles are in accord with the Council's requirements.</p> <p>No funding from the public sector is required to make the development viable, except for the provision of subsidy for affordable housing. Wallace is committed to providing 25% affordable housing in accord with the Council's policy.</p> <p>Wallace is also willing to provide affordable (low cost home ownership) housing without subsidy to augment the supply of subsidised affordable housing to achieve the agreed overall requirement as necessary.</p>	<p><b>Complies</b></p>																																																																								
<p><b>Marketability:</b> the site, or a relevant part of it, can be developed in the period under consideration;</p>	<p>East Lothian is a prime housing market area. There is an ongoing and significant demand for a full range of market housing in the locality as well as affordable housing needs. There is considerable interest from house builders to develop in this location as this is a prime location for private housing.</p> <p>This is confirmed by the regional Housing Need &amp; Demand Assessment (HNDA) and the Council's Local Housing Strategy. The Council has allocated sites in the locality as part of its development strategy for the Proposed LDP which recognises the area's marketability for housing.</p> <p>Wallace expects two house builders to be constructing on the site, together with the Council and housing associations. The affordable homes will be built throughout the site's development period.</p> <table border="1" data-bbox="577 959 1883 1155"> <thead> <tr> <th></th> <th>18/19</th> <th>19/20</th> <th>20/21</th> <th>21/22</th> <th>22/23</th> <th>23/24</th> <th>24/25</th> <th>25/26</th> <th>26/27</th> <th>27/28</th> <th>28/29</th> <th>29/30</th> <th>30/31</th> <th>31/32</th> <th>32/33</th> <th>33/34</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Private Homes</td> <td>24</td> <td>48</td> <td>48</td> <td>48</td> <td>48</td> <td>48</td> <td>48</td> <td>48</td> <td>48</td> <td>48</td> <td>48</td> <td>48</td> <td>48</td> <td>48</td> <td>48</td> <td>28</td> <td>724</td> </tr> <tr> <td>Affordable Homes</td> <td></td> <td>24</td> <td></td> <td>36</td> <td></td> <td>36</td> <td></td> <td>36</td> <td></td> <td>36</td> <td></td> <td>36</td> <td></td> <td>36</td> <td></td> <td>36</td> <td>276</td> </tr> <tr> <td>Total</td> <td>24</td> <td>72</td> <td>48</td> <td>84</td> <td>48</td> <td>84</td> <td>48</td> <td>84</td> <td>48</td> <td>84</td> <td>48</td> <td>84</td> <td>48</td> <td>84</td> <td>48</td> <td>64</td> <td><b>1000</b></td> </tr> </tbody> </table>		18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	Total	Private Homes	24	48	48	48	48	48	48	48	48	48	48	48	48	48	48	28	724	Affordable Homes		24		36		36		36		36		36		36		36	276	Total	24	72	48	84	48	84	48	84	48	84	48	84	48	84	48	64	<b>1000</b>	<p><b>Complies</b></p>
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<p><b>Infrastructure:</b> the site is either free of infrastructure constraints, or any required infrastructure can be provided realistically by the developer or another party to allow development;</p>	<p>Preliminary investigations confirm the following:</p> <ul style="list-style-type: none"> <li>• Gas, electricity and telecoms can be provided;</li> <li>• Foul drainage from the site can be accommodated; and</li> <li>• Water supply to the site can be provided.</li> </ul> <p>Infrastructure of the required capacity can be made available, subject to undertaking a DIA and WIA with Scottish Water. New foul and surface water drainage systems will be installed.</p> <p>The existing privately operated WWTW, which discharges to the Peffer Burn, will become redundant and breaches of discharge consent will be eliminated.</p> <p>The site is within the non-denominational catchment areas for Gullane and Dirleton primary schools. The Council's DER site assessment confirms that there is some limited capacity at these primary schools. Appraisals carried out confirm that the school children from the initial phases of development at Fenton Barns can be accommodated at a temporary school located at Gullane Primary School. The new primary school would then be built in phases.</p> <p>A new primary school is proposed to accommodate pupils from the proposal. This new school will be delivered by Wallace working in partnership with the Council. The cost to deliver this new school will be funded by Wallace.</p> <p>The LDP safeguards land required for an extension to North Berwick High School. This will ensure that provision can be made for non-denominational secondary school provision.</p> <p>Financial contributions to fund planning obligations will be available from Wallace to fund any necessary upgrades to infrastructure in accord with Circular 3/2012.</p>	<p><b>Complies</b></p>
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<p><b>Land Use:</b> housing is the sole preferred use of the land in planning terms, or if housing is one of a range of possible uses other factors such as ownership and marketability point to housing being a realistic option.</p>	<p>Wallace is contracted with the land owner to deliver residential development on this site along with the associated infrastructure. DC Watson &amp; Sons will continue to invest in providing specialist retail, office and industrial accommodation to increase employment opportunities.</p> <p>As a residential development, the site provides the full range of housing tenure to create a socially inclusive development.</p>	<p><b>Complies</b></p>
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# Fenton Barns

## Development Framework Report

Representation to Proposed Local Development Plan

November 2016






## Contents

<b>1. Introduction</b>	<b>2</b>
<b>2. Expanded Village at Fenton Barns</b>	<b>4</b>
<b>3. National and Strategic Land Use Planning Summary</b>	<b>6</b>
<b>4. Landscape Context</b>	<b>8</b>
<b>5. Landscape Capacity</b>	<b>10</b>
<b>6. Sustainability of Location</b>	<b>12</b>
<b>7. Site Appraisal</b>	<b>14</b>
<b>8. Proposal</b>	<b>20</b>
<b>9. Recommendation for Proposed Plan</b>	<b>32</b>



 Site Boundary (71.0 ha)

The site is situated within the existing area of Fenton Barnes, close to Drem Rail Station

# 1. Introduction

Wallace Land Investments (Wallace) controls around 71ha of land at Fenton Barns, which is being promoted on behalf of the landowner DC Watson & Sons (Fenton Barns) Ltd. The site provides an opportunity for a strategic scale mixed use development. It will compliment existing retail and other uses, which currently support around 550 jobs. It forms an expanded village in a location near Drem which is identified by the Council as having potential for longer term growth in the Proposed Plan.

Fenton Barns is within the East Lothian Strategic Development Area (SDA). The site has been assessed (SEA Ref: MIR/NK/HSG137 *Land at Fenton Barns*) in the *Draft Environmental Report, Appendix 10, North Berwick Area Site and Strategic Environmental Assessments - Part 2*.

The proposal will help deliver the Council's *Economic Development Strategy*.

This proposal will also help meet the identified shortfall arising from the Council's proposed development strategy failing to meet the strategic housing land requirement set by SESplan. The site is not part of a sensitive landscape and has low environmental impact.

The proposal for around 1,000 private and affordable homes, a new community primary school, economic development and associated facilities and infrastructure. Set within a robust landscape context and greenspace framework, it will build upon existing employment and amenities to form a sustainable community.

Further promotion of economic development and expansion of speciality retailing on 6.2ha will be undertaken and delivered by the existing owner – DC Watson & Sons, building on the company's successful track record to date.

This proposal will deliver a range of uses assisting in the ongoing economic regeneration of rural East Lothian. The proposal includes additional serviced land and buildings for speciality retailing, offices and industrial development.

The creation of an expanded village from existing developments will deliver key infrastructure, most notably the delivery of an upgraded foul drainage system replacing the existing private treatment works which businesses depend on. This current system does not meet legislative requirements and current business requirements.

To ensure that the proposal is socially inclusive, 25% of the new homes will be affordable housing. Up to 250 affordable homes will be built along with the private homes.

The full range of affordable housing tenures can be delivered – social rented, intermediate homes and entry level homes for sale.

The new primary school would be community based, encouraging lifelong learning and sports facilities. This new primary school will be built in phases with the first phase (for a short period) based in temporary accommodation in Gullane Primary School.

The expanded village will have a robust landscape framework. This will create a series of wildlife corridors, play areas and core path network with views and links to East Lothian's countryside.

Creating an expanded village, based on the economic activities already established at Fenton Barns, will help to minimise impacts on surrounding communities from further housing development and provides for a sustainable live-work community.

The land is within a single ownership and this is an important consideration in funding infrastructure.

Wallace is committed to delivering the necessary infrastructure including the improved drainage system, new community primary school and any potential expansion of the local secondary school.

As required, financial contributions to off site road improvements, public transport improvements, and public realm will be taken into account in the delivery of infrastructure for this proposal.





Existing buildings will form the core of a expanded village at Fenton Barnes



## 2. Expanded Village at Fenton Barnes

### **New settlement accords with planning policy**

The expanded settlement at Fenton Barnes (103ha comprising existing and proposed uses) is located in the East Lothian SDA. This accords with the development strategy in SESplan.

This expanded settlement is also in accord with the requirements set by Scottish Ministers in the National Planning Framework to help deliver more housing in the SESplan area.

Although SESplan does specifically promote a new settlement to meet the housing land target for East Lothian at Blindwells, the allocation of a further new settlement at Fenton Barnes has a key role to play in delivery of the spatial strategy and future rural economic development in this part of East Lothian, as required by SPP.

An expanded settlement at this scale of up to 1,000 homes, extending to 103 ha, can deliver necessary infrastructure cost effectively.

The designation of Fenton Barnes as a settlement allows an agreed masterplan approach to consolidate existing fragmented development, improving sense of place in accord with SPP, *Designing Streets and Creating Places*.

Additional housing at Fenton Barnes will reduce pressure to release Green Belt land elsewhere in East Lothian or greenfield land adjacent to settlements in the west sector of the East Lothian that are already at their environmental capacity.

### **Designation supports existing uses**

The existing area of Fenton Barnes extends to over 50ha. It is a considerable developed area but not designated as a settlement.

Fenton Barnes 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 within the settlement envelope associated with a village use, complementing and supporting existing businesses.

Without a settlement designation, all economic development at this location will continue to be treated as *Development in the Countryside* and contrary to the development plan.

Designation as a settlement supports the broad range of existing businesses at Fenton Barnes including local craft shops, local shop, nursery and other smaller businesses as well as the larger employers such as Monaghan Mushrooms and Brown Brothers.

### **New infrastructure supports existing jobs**

There are already around 550 full or part time jobs at Fenton Barnes. The new settlement will deliver essential drainage infrastructure necessary to support and safeguard existing businesses.

The potential for DC Watson & Sons to add to their existing accommodation and infrastructure has been investigated. It will also stimulate further expansion for existing businesses and offers potential to attract future businesses to rural East Lothian.

### **Sustainable development**

Development at Fenton Barnes will be sustainable as the new infrastructure is delivered. The expanded village will be comprehensively designed (in accord with a masterplan brief in the LDP) to be in keeping with its surroundings.

The site will provide a full range of local facilities commensurate with a settlement of its size of up to 1,000 homes, as well as shops, employment and commercial uses. This will build upon the existing residential and commercial mix already in place.

New facilities, including a new primary school, will be provided and phased with development.



**Site Boundary**

Key (from SESplan Strategic Development Plan June 2013)

**EAST LOTHIAN**

- Committed Housing
- Green Belt
- SESplan Boundary
- Principal Rail Routes
- Principal Road Routes
- Proposed Rail Routes
- Strategic Development Area
- Oxwellsmains Waste Treatment Plant
- New Non-Nuclear Base Capacity

Key (from East Lothian Local Development Plan Main Issues Report 2014)

- Preferred Sites
- Alternative Sites
- Other Options
- Preferred Employment Sites
- Committed Housing Sites
- Primary School Catchments

Extract from SESplan Strategic Development Plan June 2013 Figure 4 - East coast (p21)

Overlay Extract from East Lothian Local Development Plan Main Issues Report 2014 North Berwick Area and Summary Maps

**SESplan**

**Area 22 - East Lothian Central**

Area 22 - East Lothian Council taken from SESplan Strategic Assessment Technical Note

Fenton Barnes is part of the East Lothian SDA.

### 3. National and Strategic Land Use Planning Summary

The Council is concerned that the site is not within the East Lothian SDA.

As the plan opposite demonstrates, the proposal is part of the East Lothian SDA, and East Lothian Central - Area 22 which is a preferred area for future development.

#### National Planning Framework 3

National Planning Framework provides the statutory framework for Scotland's long-term spatial development. It confirms that the Scottish Government wants to see a significant increase in house building, especially in the SESplan area.

It notes the need for flexibility and generosity in housing delivery and supply and a focus on sustainable areas with greatest level of change expected including East Lothian.

The Government's *Economic Strategy* prioritises regeneration to promote sustainable economic growth and make Scotland a successful, sustainable place.

#### Scottish Planning Policy

Scottish Planning Policy (SPP) promotes sustainable economic growth and a presumption in favour of development that contributes to sustainable development, regeneration and the creation of well-designed, sustainable places.

SPP (paragraphs 53 and 54) states:

*53. The creation of a new settlement may occasionally be a necessary part of a spatial strategy, where it is justified either by the scale and nature of the housing land requirement and the existence of major constraints to the further growth of existing settlements, or by its essential role in promoting regeneration or rural development.*

*54. Where a development plan spatial strategy indicates that a new settlement is appropriate, it should specify its scale and location, and supporting infrastructure requirements, particularly where these are integral to the viability and deliverability of the proposed development.*

SPP therefore seeks to guide new housing development in areas where economic investment is planned. It supports the principle of a new settlement development, such as Fenton Barns. Fenton Barns already is a vibrant and significant local employment destination in East Lothian with the capacity to expand.

SPP requires that the planning system promotes a flexible diverse approach to business and industrial development. This is an integral part of the Fenton Barns proposal.

#### Strategic Development Plan

The SESplan Strategic Development Plan sets the strategic framework for land use planning in the period to 2032.

The Spatial Strategy promotes a sustainable pattern of growth. It is supported by a delivery framework which promotes and secures economic growth and the delivery of housing in the most sustainable locations using an infrastructure led approach. Expansion at Fenton Barns accords with this approach.

East Lothian is a Sub-Regional and Strategic Development Area acting as a primary location for growth and investment and the A1/ East Coast Mainline Corridor is a focus for further development.

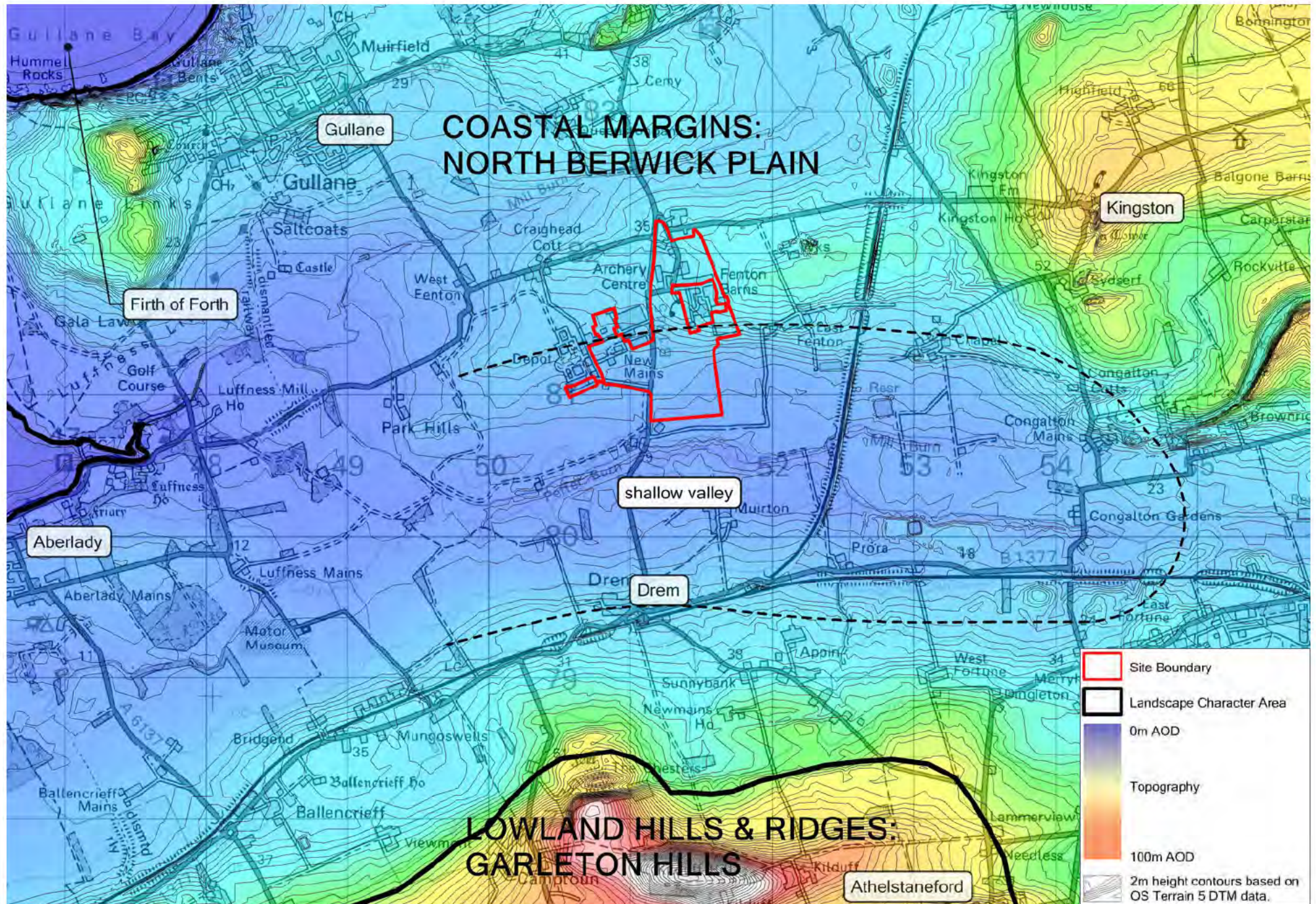
Development proposals at Fenton Barns will complement and not undermine the delivery of existing committed development. SESplan *Spatial Strategy Assessment Technical Note: Appendix 1* identifies *East Lothian Central - Area 22* as a preferred development location.

Fenton Barns is within this area and there is support in principle for an appropriate scale of development at Fenton Barns.

#### Conclusion

The establishment of Fenton Barns as an expanded settlement will deliver a highly sustainable and well planned new community. It also facilitates the growth of future economic development as explained in the report: *Fenton Barns - Realising its Economic Potential*.





The site is relatively well contained visually from the north due to the local ridgeline.



## 4. Landscape Context

In its Strategic Environmental Assessment, the Council is concerned that the proposal is *...within open countryside and not well related to an existing settlement.*

Fenton Barns is a location for a speciality retailing centre and economic development. It extends to 50ha but it is not designated as a settlement in the development plan.

The site and its setting are located within the *North Berwick Plain Coastal Margin Landscape Character Area*. Immediately inland from the coast, the plain is virtually flat, consisting of raised beach deposits, gradually giving way to gentle undulations towards the south.

Fenton Barns is located on the northern edge of the shallow valley of the Peffer Burn. This location results in the site being largely visually discrete from the wider landscape, with views limited to locations within the surrounding shallow valley.

The site is within the SNH *Landscape Character Assessment for the Lothians (No. 91)*, and within the *North Berwick Plain Coastal Margin Landscape Character Area*.

The site is relatively well contained visually from the north, including the coastal settlement, due to the local ridgeline. Some localised views are possible from the south, although these are restricted due to intervening tree belts, and long distance views will be possible from the Garleton Hills.

These long distance views, or indeed localised short distance views, need to be considered within the existing urban and landscape context of large scale buildings at Fenton Barns.

This urban context extends to over 50ha of development including large scale buildings.

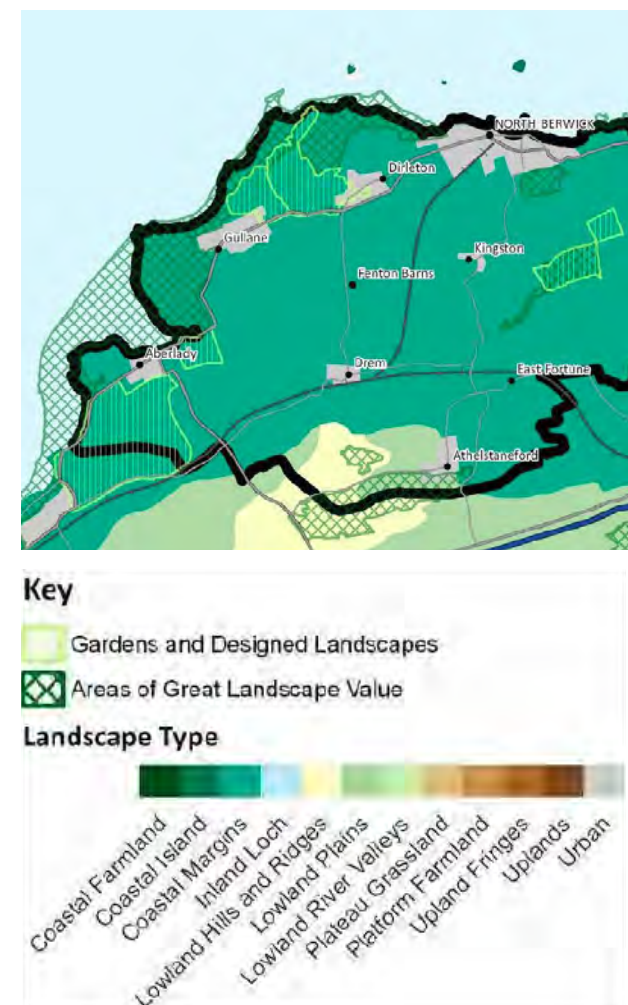
The visual impact of further development at Fenton Barns is substantially reduced because of the comprehensive scale of existing development lying below and on the existing ridgeline.

Overall, the site is not particularly sensitive in terms of the qualities and sensitivities of its Landscape Character Area.

Fenton Barns has no landscape designations associated with it. The closest designation is at Direlton, approximately 1.5km to the north. Direlton has extensive Gardens and Designed Landscape, but Fenton Barns is located over a ridgeline from Direlton, and so is not readily visible. Existing large scale buildings are visible on the ridgeline.

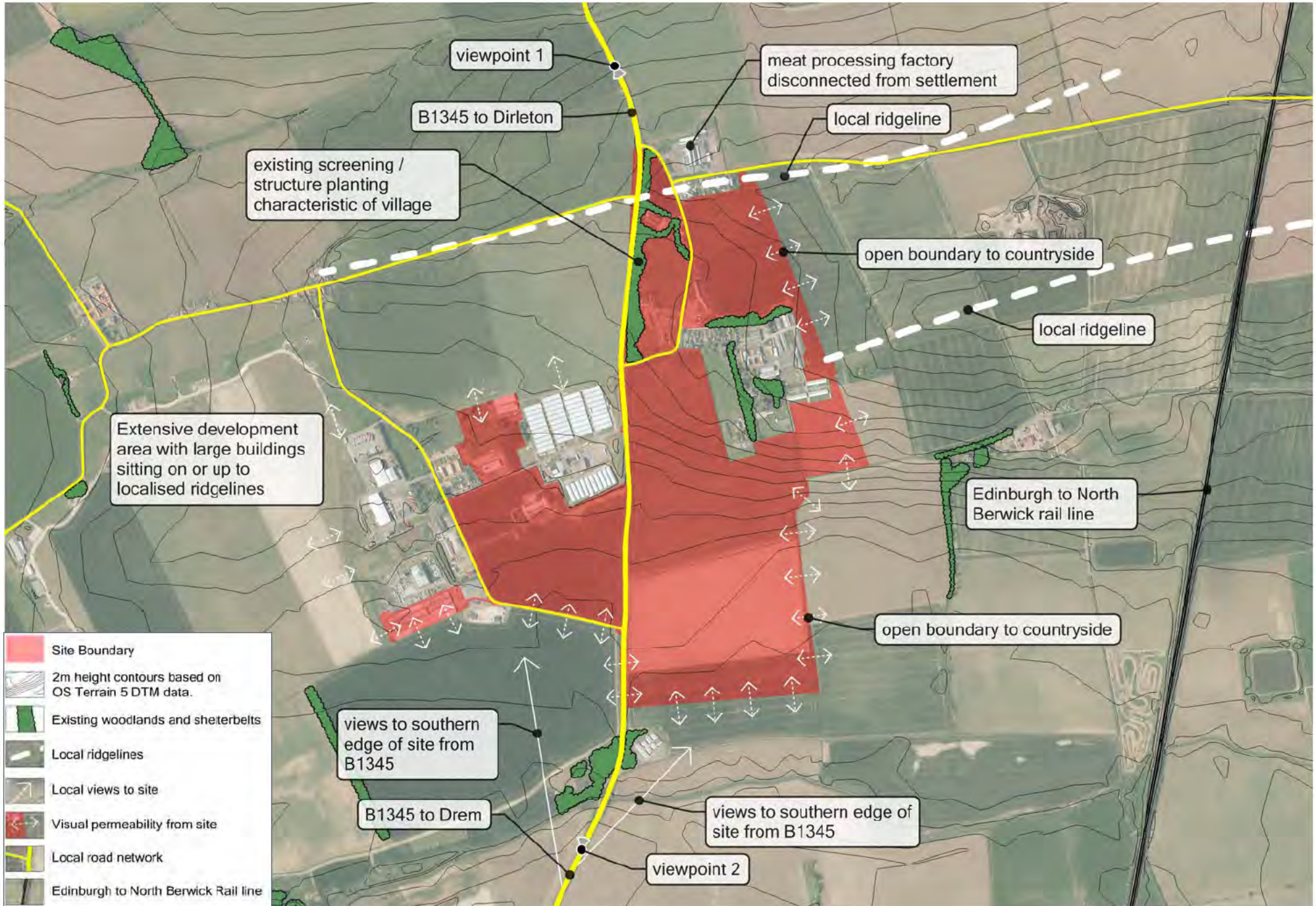
Areas of Great Landscape Value are widespread within this landscape character area, but are generally associated with the coastline than inland areas such as Fenton Barns.

The locality has the capacity to accommodate the scale of development proposed.



Landscape Characteristics - Extract from LDP MIR Appendix 9





The majority of the existing buildings lie on or over the localised ridgelines, making it visually discrete within the landscape



## 5. Landscape Capacity

Fenton Barns is currently a disjointed cluster of holdings formed in association with agricultural uses and the former location of Drem Airfield.

The B1345 forms a primary route between Drem and Dirleton. Existing buildings are located along this road which are not integrated with their surroundings.

The built form consists of a small area of housing to the east of the B1345, and relatively large buildings scattered to the north and west. The majority of the buildings lie on and over the localised ridgelines, making the proposed development area visually discrete.

The built elements are interspersed with structure planting, which are characteristic of the location and the wider area. Future structure planting will follow this pattern.

A meat processing factory at the north of the site is visible on the horizon on approach from the north, and the mushroom plant and industrial buildings to the west are visible from the south and west.

The visual primary receptors are road users of the B1345. This road is a link used by vehicles travelling between Drem to the south and Dirleton to the north, amongst other local road users.

Development of the site offers the opportunity to unify the cluster of holdings, and to allow Fenton Barns to be interpreted as a single settlement in the landscape.



Fenton Barns on approach from the north (viewpoint 1) showing the meat processing factory on the horizon.

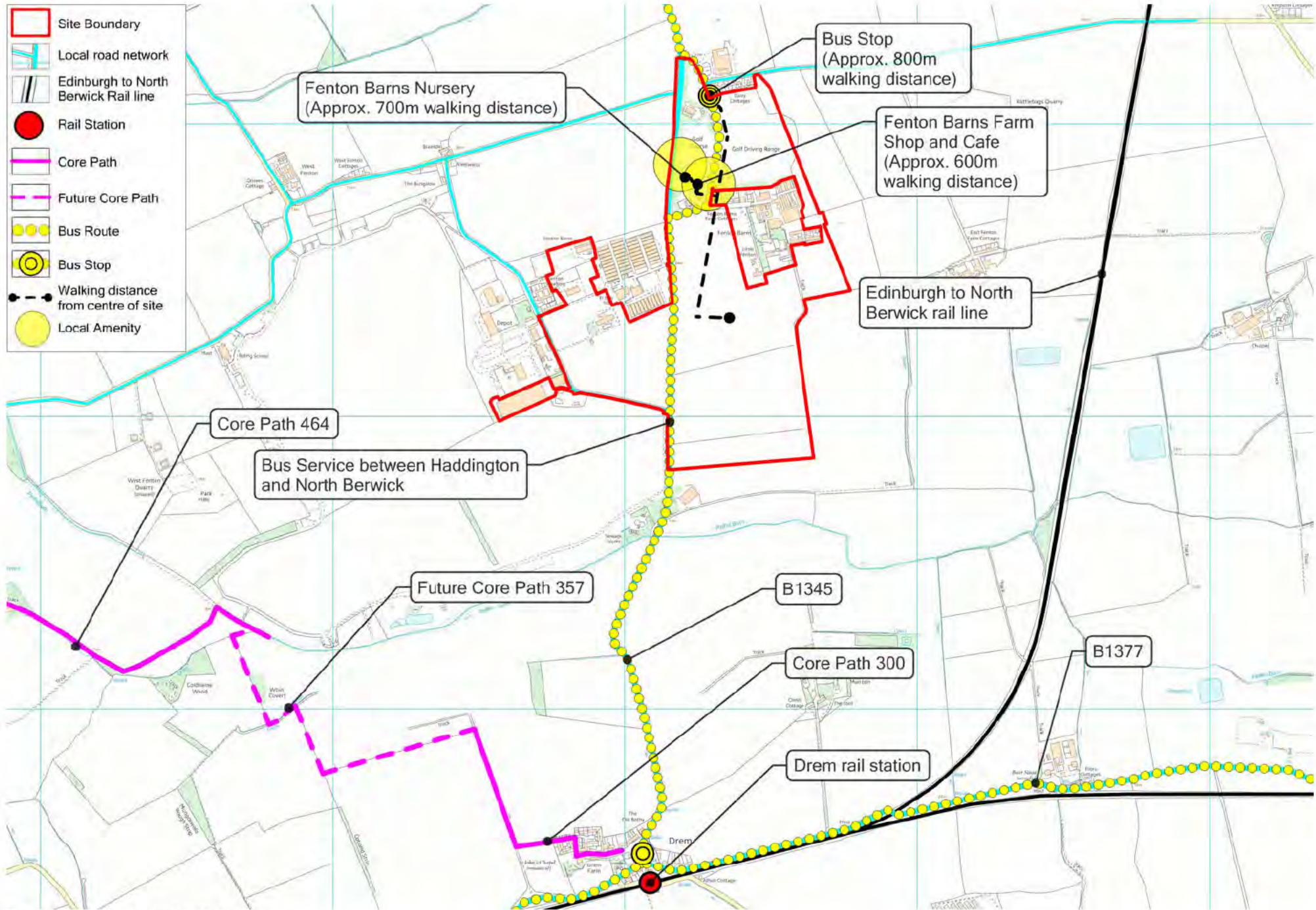


Fenton Barns on approach from the south (viewpoint 2) showing effective local screening.



Fenton Barns from the Garleton Hills further to the south. The site is visible as a disjointed group of industrial buildings from here.





The site is located within a sustainable location



## 6. Sustainability of Location

Further development at Fenton Barns supports sustainable growth in East Lothian.

SPP, Paragraph 28, introduces *...a presumption in favour of sustainable development*. Paragraph 29 confirms that policies and decisions on sustainable development should be guided by 13 principles set out in SPP.

In terms of sustainability, there are two matters to address – the sustainability of the location and the sustainability of the proposal.

The Council highlights that Fenton Barns is not a settlement and this impacts on sustainability. The site is in a sustainable location. The Council has identified the potential for further long term growth at Drem.

### Connections to the Surrounding Area

The site is located within the Drem area of Search for significant new development. There are no Core Paths within the site, although connections may be possible to Core Path 464 to the west. There are no paths which cross the site. New paths will be incorporated within the proposal, providing linkages to the existing path network.

### Accessibility to Public Transport

The *Draft Environmental Report, Appendix 10, North Berwick Area Site and Strategic Environmental Assessments - Part 2* (DER), confirms that the site is located within 400m of the existing Haddington to North Berwick bus route, and states that this is the only bus service available.

The Council omits that Haddington to Ocean Terminal service (via Gullane) also passes the site on the B1345. A future bus stop here would be possible on that route. Connections are also available to Edinburgh from Haddington.

Drem rail station is approximately 2.1km to the south and is accessible via existing bus services. Train services from Drem operate to Edinburgh, and Glasgow to the west, and Dunbar, Berwick, Newcastle and beyond to the east. This rail station is popular for commuting with regular services and the Council has plans for expanding car parking.

### Proximity to Services and Amenities

There are established services including the shop, nursery, play area and other leisure facilities at Fenton Barns. These are all within easy walking distance of the centre of the site.

North Berwick is located 6km to the north east where wider services are accessible via the existing bus route.

The proposal includes a range of local services including shops, leisure and employment uses commensurate with a village of around 1,000 homes. This will build on and support the existing services already in place at Fenton Barns.

The proposal also includes the delivery of a new primary school, phased alongside the development. The new primary school will be within walking distance of the new homes. The proposal for the new school is set out in more detail in Section 8.

The site is within the catchment area of North Berwick High School. North Berwick High School is located on a bus route that departs from the site and provides an alternative to using the car to travel to school.

### Accessibility to Transport Routes

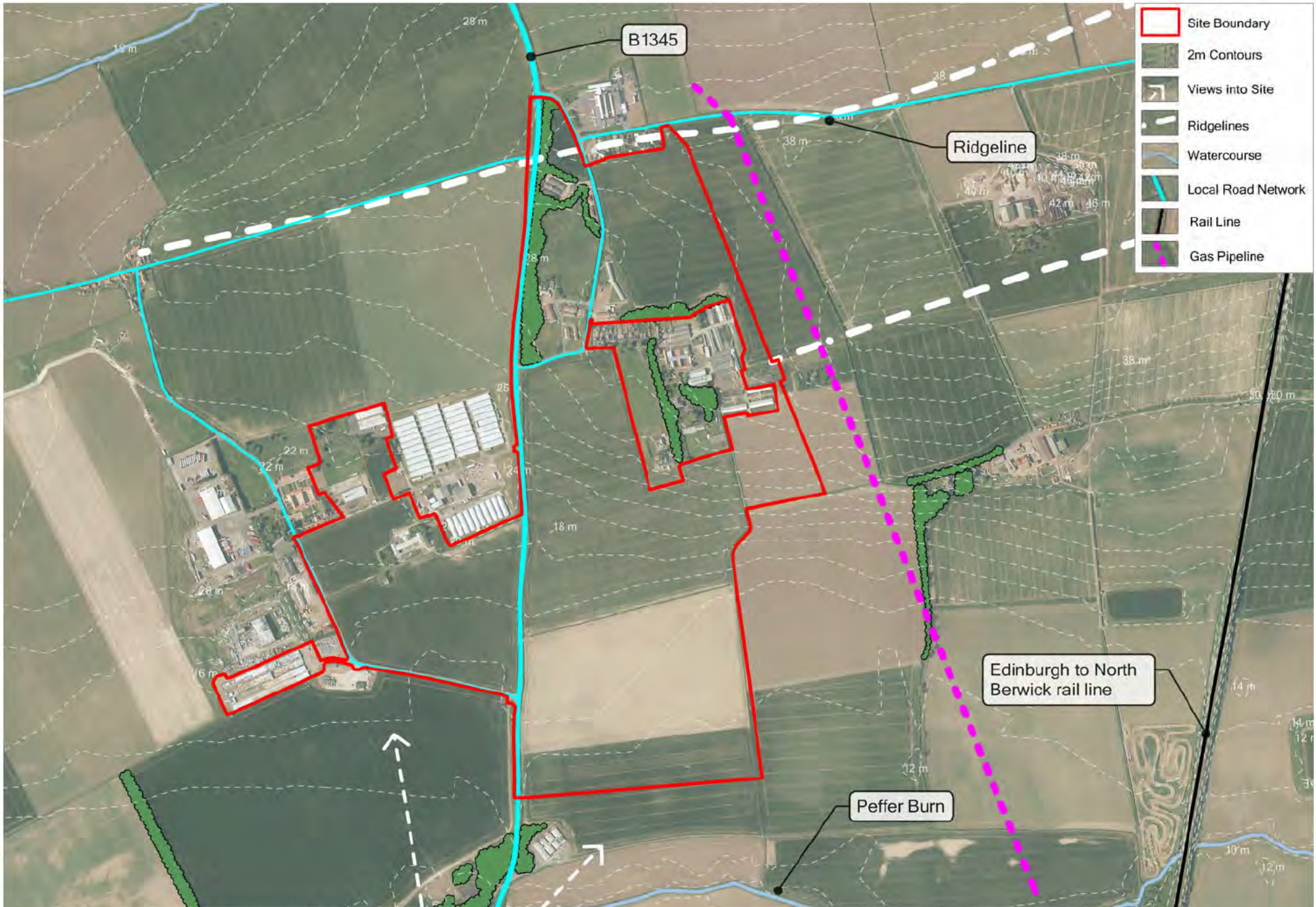
Vehicular access into the site is available from the B1345 road. The B1345 runs through the site. It provides access to North Berwick, via the A198 to the north. It also leads to Drem to the south. This road leads to the A6137 to the west which leads to Haddington. It is a well connected location.

Access to the A1 is possible via the A6137 at Haddington. The A1 provides access to Edinburgh, Berwick, Newcastle and beyond.

### Conclusion

This analysis confirms that the site is in a sustainable location, in accord with the provisions of SPP and SESplan.

Fenton Barns is an existing location for business use and speciality retailing. The Council needs to recognise its status by designating the site as a settlement.



There are no physical constraints to the development of the site



## 7. Site Appraisal

The site has been assessed with regard to the following aspects:

- Access
- Topography
- Land Quality
- Microclimate
- Human Health
- Drainage

More detailed analysis in respect of Ecology, and Cultural Heritage, as well as Drainage, Education and Transport infrastructure are explained in this Report.

### Access

Vehicular access into the site is available from the B1345. The B1345 runs through the site and provides access to North Berwick, via the A198 to the north. It also leads to Drem to the south, beyond which the A6137 leads to Haddington where it is possible to connect to the A1.

### Topography

The low point is at the southern end of the site adjacent to the B1345, at around 12m AOD. The land rises gently to the north, reaching a high point of around 36m AOD, adjacent to Fenton Barns Cottages.

In the context of the wider landscape, the site sits in a shallow valley. The land further north rises towards Dirleton and the land to the south falls towards Drem.

### Land Quality

The site comprises prime quality agricultural land falling with Classes 1, 2 and 3.1.

The proposal incorporates the re-use of previously developed land, minimising the use of agricultural land needed. Accordingly, the proposal complies with the requirements of SPP.

### Microclimate

The site is generally south facing, providing opportunity for the incorporation of sustainable design.

Existing trees and built form, combined with the topography of the landform, provide some shelter for parts of the site from northerly winds. Proposed structure planting will strengthen protection from northerly winds and also provide shelter from the prevailing south westerly wind.

### Human Health

The Gas Pipeline is located to the east of the site. Its location is shown on the plan opposite. The proposal for the site will take full account of HSE's advice set out in the PADHI guidelines.

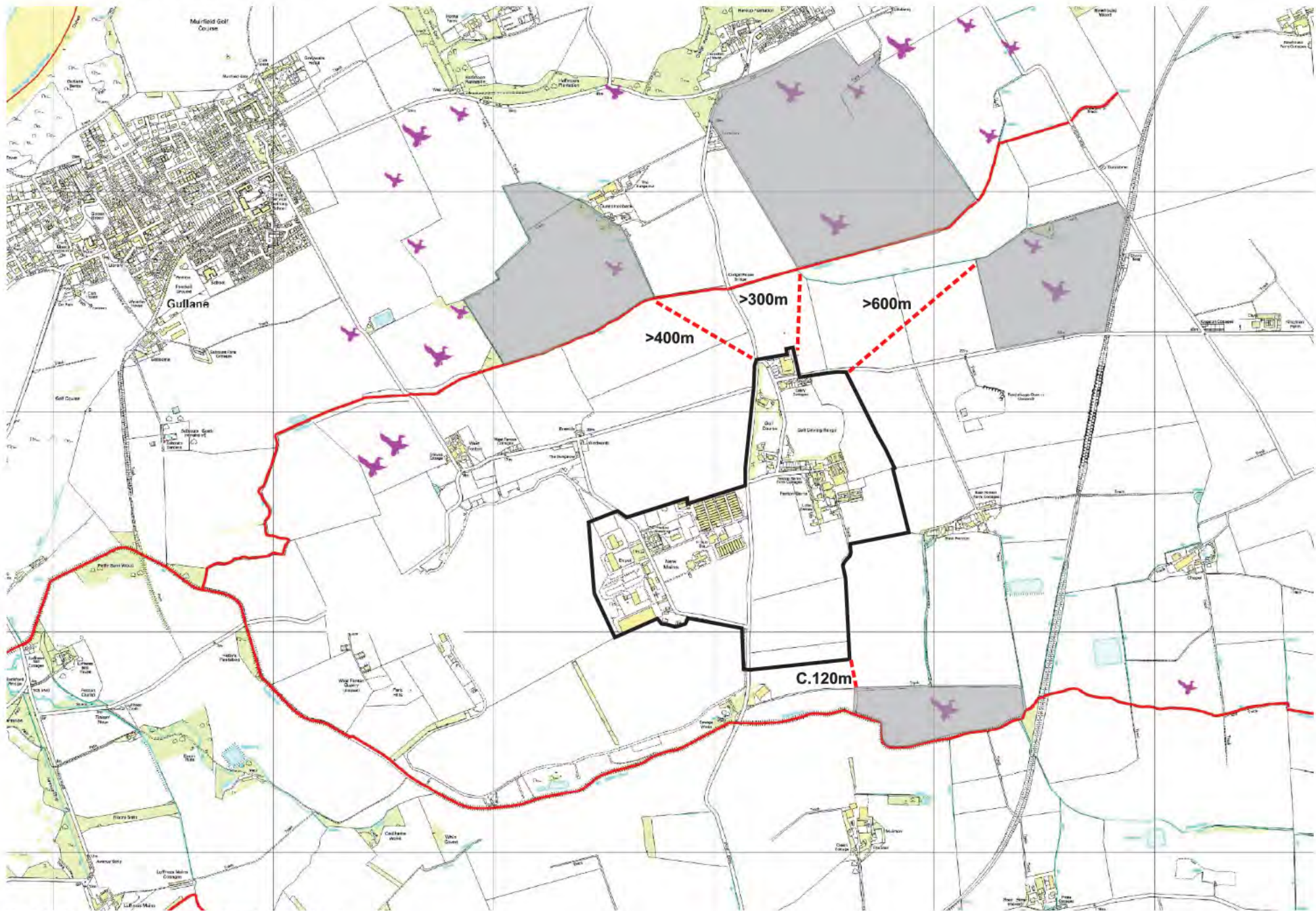
The proposal will incorporate open space and play areas and opportunities for a new network of paths and cycleways. This will encourage walking and cycling with subsequent benefits for a healthier lifestyle.

### Drainage

The site is not indicated as being at risk of fluvial flooding by SEPA. Very small areas of the site may be susceptible to pluvial flooding. This matter will be taken into account through the implementation of SuDS measures as part of the development.

As noted in the Council's DER, the *...provision of new waste water infrastructure ... could impact positively on the ecological status of the water environment as it would prevent the discharge of waste water into Peffer Burn.*

The new drainage infrastructure, arising from the proposal, will prevent these discharges and provide significant improvements to water environment.



Key fields for Pink Footed Geese are not located within the site



## Ecology

### *Pink-footed Geese*

The site is located south of the Firth of Forth SPA which runs around the coast, and sits in the area identified as the main area for Pink-footed Geese.

The key issue in ecological terms to any proposed developments in this part of East Lothian is the impact to Pink-footed Geese. This is notwithstanding protection for other habitats and species.

The following information was extracted from the document 'Planning Guidance for the Location and Design of Wind Turbines in the Lowland Areas of East Lothian' (East Lothian Council – December 2010).

*Fields within a line from Tranent – Haddington – East Fortune – North Berwick are key feeding grounds for thousands of pink-footed geese in the autumn and winter. Their roost sites along the coast (a Special Protection Area) and feeding grounds inland are covered by European legislation.*

*Where a development may affect a qualifying interest of a Natura 2000 site the Council must carry out an Appropriate Assessment under the Habitats Regulations prior to determining the application. The applicant will need to submit sufficient information to allow this to be undertaken.*

Surveys for Pink-footed Geese have been carried out. The key fields have been identified around Ballancrief, Drem, Fenton Barns and Brownrigg, although this changes during the over-wintering period. There are no key fields within the site.

The closest of these key fields to the site boundary are southeast, northwest, north and northeast, the southeast field being the closest at approximately 120m with the rest being over 300m away.

ELC Biodiversity Officer has advised that the key fields will not obtain development consent, and that adjacent fields will also be considered in their role as a buffer between the key fields and any proposed development. The permitted proximity of a development to the key fields will largely depend on the nature of the development and the level of disturbance likely to the birds.

In general, Pink-footed Geese are one of the goose species more easily put to flight. They tend not to feed in fields of less than 6 hectares, and not near roads (*RSPB Guidance Notes*) or other disturbance. This confirms that the existing fields associated with the site would be less favourable for feeding geese given proximity to the roads and existing residential and commercial developments. This is possibly the reason why the key feeding fields around Fenton Barns are at some distance from the site.

Development of the site will bring increased human activity closer to the southeast and northwest key fields in particular. At present, the fields in use by geese would suggest that the geese accept the level of agricultural activity on and around the site.

To mitigate post construction increase of noise and visibility, the south part of the development should be fully screened on all boundaries. During construction, the boundaries should also be screened by an appropriate means, e.g. bunds, advance planting, fencing.

With regard to the size of the site in relation to the size of the main feeding area identified by the Council, it is a loss of approximately six or parts of six fields (none of which are key fields). As a loss to the entire main feeding area, it is not substantial.

### *General Ecology*

The greenfield part of the site comprises a series of agricultural fields. Apart from geese, these fields are of less importance, although field margins may be of higher biodiversity value if ploughing stands off from the hedgerows and these margins have been left as rough grassland.

Unmanaged rough grassland edges, such as field margins and to the west around the depot area, will have increased biodiversity opportunities, as will tree belts (north), and roadside margins. These will be the areas where nesting birds occur and mammals use both for shelter and movement through the site.

Any built structures affected have the potential for bats and nesting birds.

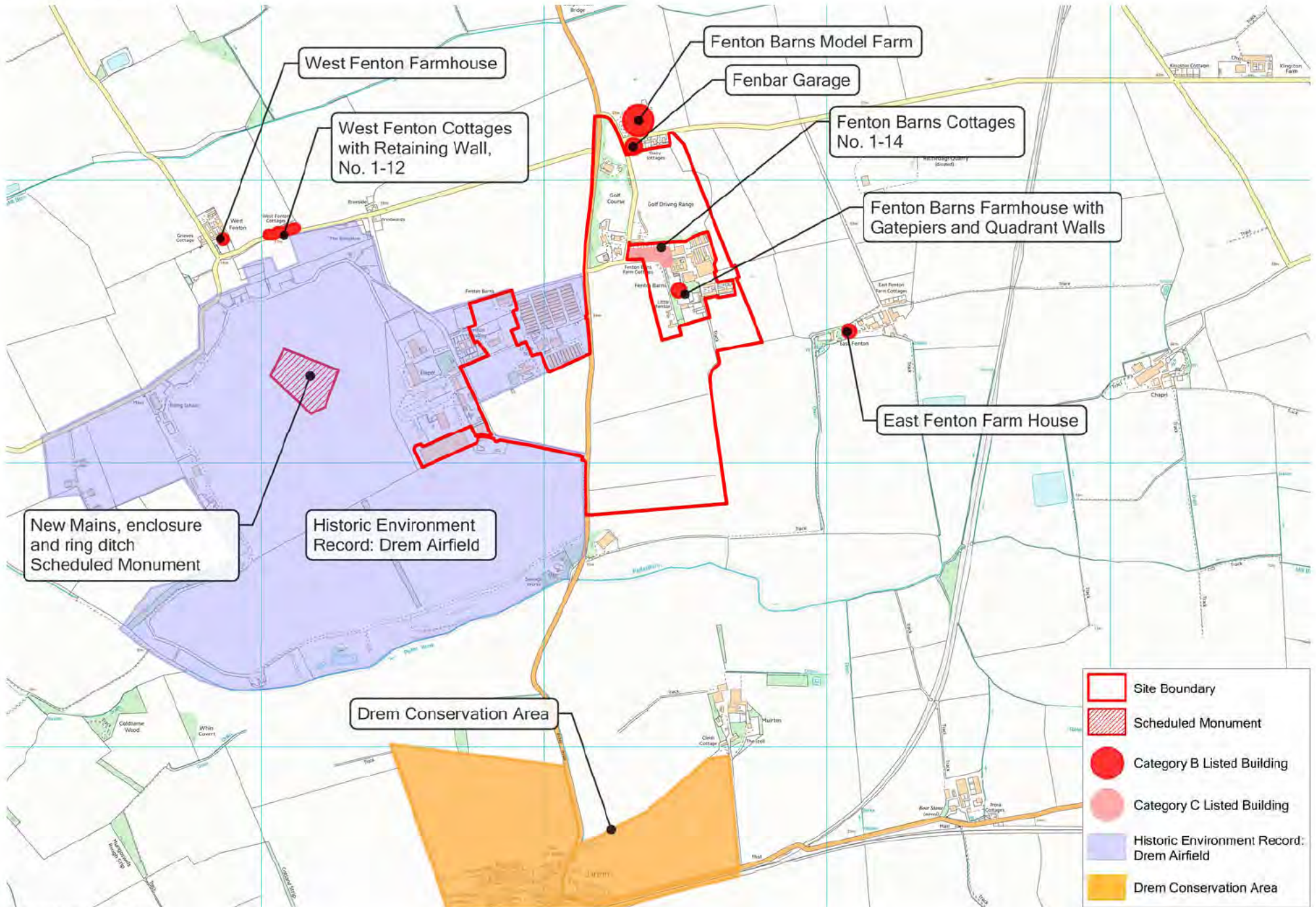
There will be opportunities from development of the site for significant habitat enhancement and creation, with species benefit and biodiversity gain.

The Council has identified a range of habitats and species as priorities under Local Biodiversity Plan targets for Farming and Wildlife. A major project is developing habitat for grey partridge with participating farmers. This species would need consideration in any site assessment.

### **Conclusion**

From this exercise, there do not appear to be significant constraints to development of the site, provided it is undertaken sensitively, respecting existing habitats and providing connectivity to the wider area.

Disturbance to the Pink-footed Geese will be taken into account through new landscape screening between the development and the key fields some distance away.



## Cultural Heritage

Parts of Fenton Barns were previously an airfield. All of the proposed residential development lies outwith the historic Drem airfield area.

Royal Air Force Station Drem was one of the most active fighter stations in Scotland during World War Two. Its strategic position at the mouth of the Forth estuary provided first-line cover for Edinburgh, the Forth Rail Bridge and naval base at Rosyth. It also lay on the flight path of German bombers heading over to Glasgow and Clydebank.

An airfield has existed on this site from 1916, when it was known as West Fenton Aerodrome. The runways were of grass, remaining so throughout its existence. By the end of World War One, West Fenton had been renamed Gullane Aerodrome.

This Aerodrome was vacated in 1919 and remained unused until 1933. It then saw occasional use during coastal defence exercises by 602 (City of Glasgow) and 603 (City of Edinburgh) Squadrons, Royal Auxiliary Air Force.

By 1939, the grass airfield which had grown into disrepair, was resurfaced, pending the start of the Second World War and was renamed RAF Drem. The grass runways have since been ploughed up and cultivated.

Between 1942 and 1946, RAF Drem had a Royal Navy presence. The airfield came under the Admiralty entirely in 1945, and was named HMS Knighthawk.

Drem was returned to the Air Ministry from the Admiralty in 1946 and was soon decommissioned. Only a small number of the hundreds of RAF buildings now remain, including two hangars.

The plan opposite details the designations, including Scheduled Monument and Listed buildings, across this historic airfield. The extent of the airfield is designated as a Historic Environment Record.

Most of the remaining buildings associated with the RAF Drem are in use or have the potential to be re-used.

The area of the site within the Historic Environment Record area of Drem Airfield will continue to be used, mainly for employment uses. This accords with the use of existing buildings within this former airfield.

All of the residential development within the site is located to the east of the B1345 and outwith the historic Drem Airfield area.

The setting of the listed buildings and the scheduled monument will be taken into account in the design process for the expanded village.

There are two Category B Listed buildings located to the north of the site - Fenbar Garage and Fenton Barns Model Farm.

Fenton Barns Model Farm was built circa 1940 and is an example of the International Modern Style. The building, originally designed as a model milking complex, is currently used as a meat produce factory. The area of the site adjacent to Fenton Barns Model Farm is proposed as open space.

Fenbar Garage was built around the same time as Fenton Barns Model Farm, also in the International Modern Style. The adjacent site to the west and immediate south of Fenbar Garage is proposed as open space to protect its setting.

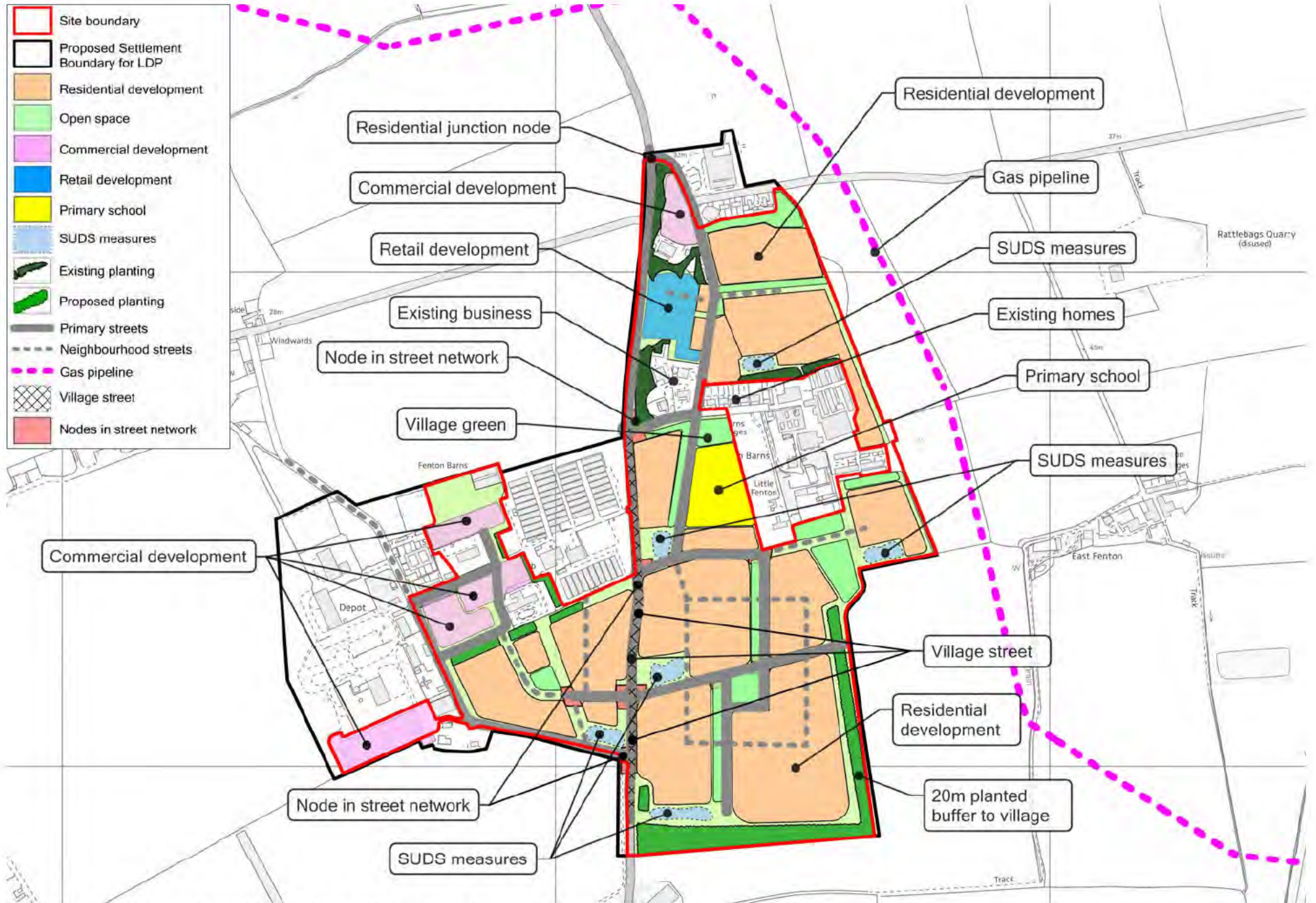
The setting of Fenton Barns Farmhouse (Category B Listed) has been taken into account and the proposal will introduce a landscape framework to respect this setting.

Fenton Barns Cottages No. 1-14 are Category C Listed buildings, located centrally within the site. These single storey buildings front onto the site and a village green is proposed in this area with the cottages overlooking.

The provision of open space to the areas adjacent to these Category B and C Listed buildings will mitigate the impact from proposed residential development.

The site is located outwith the Drem Conservation Area, which is located to the south of the site. The development of Fenton Barns will not impact upon the Drem Conservation Area.





Indicative development framework for around 1000 new homes with further economic development and associated infrastructure



## 8. Proposal

The Fenton Barns Retail and Leisure Village currently offers a unique shopping experience and accommodates over 20 craft, furniture and other units including the Scottish Archery Centre. The total site incorporates up to 80 businesses supporting some 550 jobs.

The site at Fenton Barns provides an exciting opportunity to build on what is existing and expand existing development to meet the housing land requirements, set by SESplan for East Lothian, as well as support continuing employment at this location.

This development will be an exemplar for sustainable development with its own identity and community. At a size of around 1,000 homes, it can support essential community facilities, such as a new community primary school, parks and play areas along with additional shops and businesses. The presence of existing jobs in the village enhances its sustainability.

One of the priorities is to traffic calm the B1345 as it passes through the village. The proposal will alter its role from a distributor road to the main street for the village. A series of measures are proposed to achieve this including introducing a series of nodes at existing and new junctions along its route through the village.

Interventions along the road will be introduced to slow traffic down, in accord with Council guidance. Housing and other uses will front onto the road. Within the village, pedestrian movement will have priority over cars. Existing bus services will be improved.

Another priority is to replace the existing drainage infrastructure to allow current economic uses to comply with SEPA's stringent requirements. The current drainage system will be replaced with a system which is adoptable. A comprehensive strategy for SuDS will be introduced, maintaining surface water drainage to greenfield levels.

To ensure that the proposal is socially inclusive, affordable housing will be built along with the private homes. The full range of affordable housing tenures can be delivered – social rented, intermediate homes and entry level homes for sale can be provided as part of the proposed 250 affordable homes.

The existing function of Fenton Barns as one of the major employment areas in rural East Lothian will continue. Further economic development will be promoted through the re-use and upgrade of existing buildings with opportunities for new infill development.

Existing industrial buildings to the west of the village will be incorporated in a landscaped setting. Further investment in the Fenton Barns Retail Village will follow.

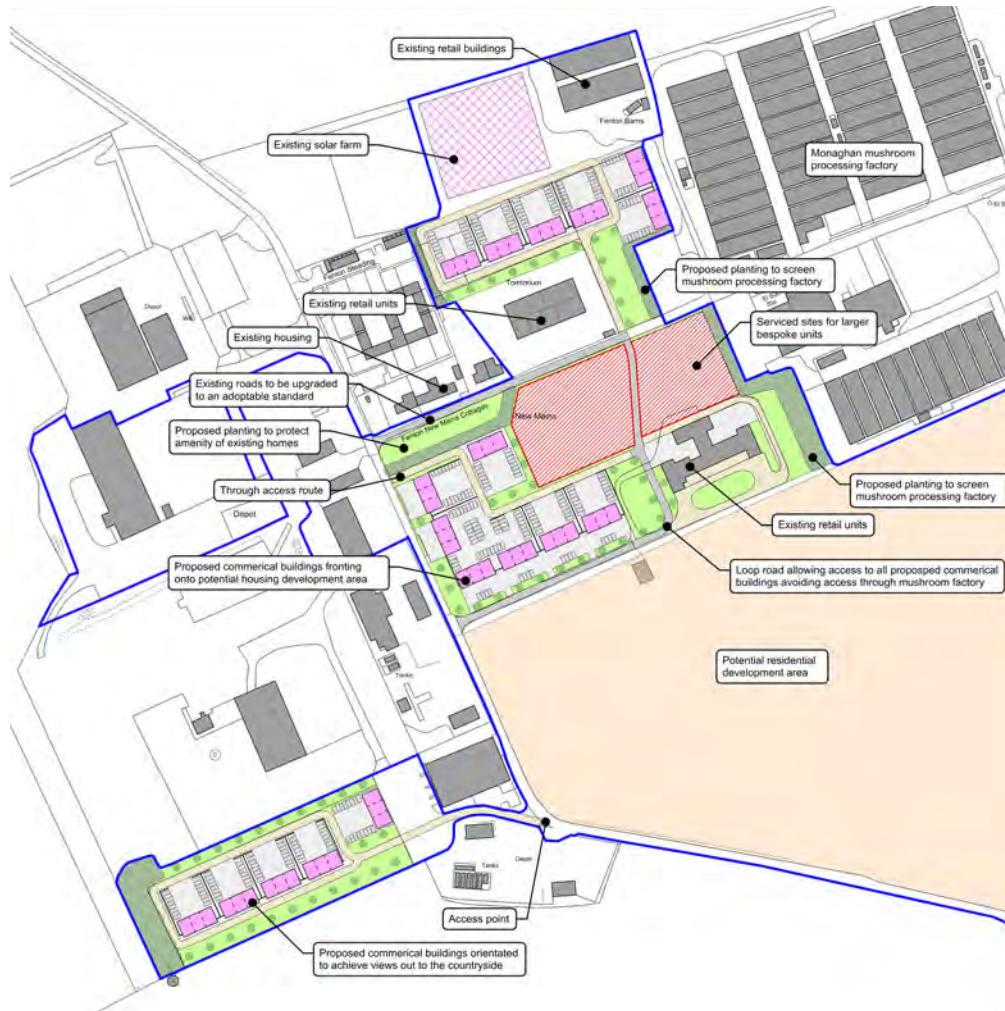
The new primary school will be constructed in a phased basis to grow to a single stream (or larger) school. It will be available for community use, enabling lifelong learning and sports facilities to be shared with the surrounding local communities as well as new residents.

This new school will be located close to the existing homes and will be the heart of the new community. It will be set within its own greenspace framework.

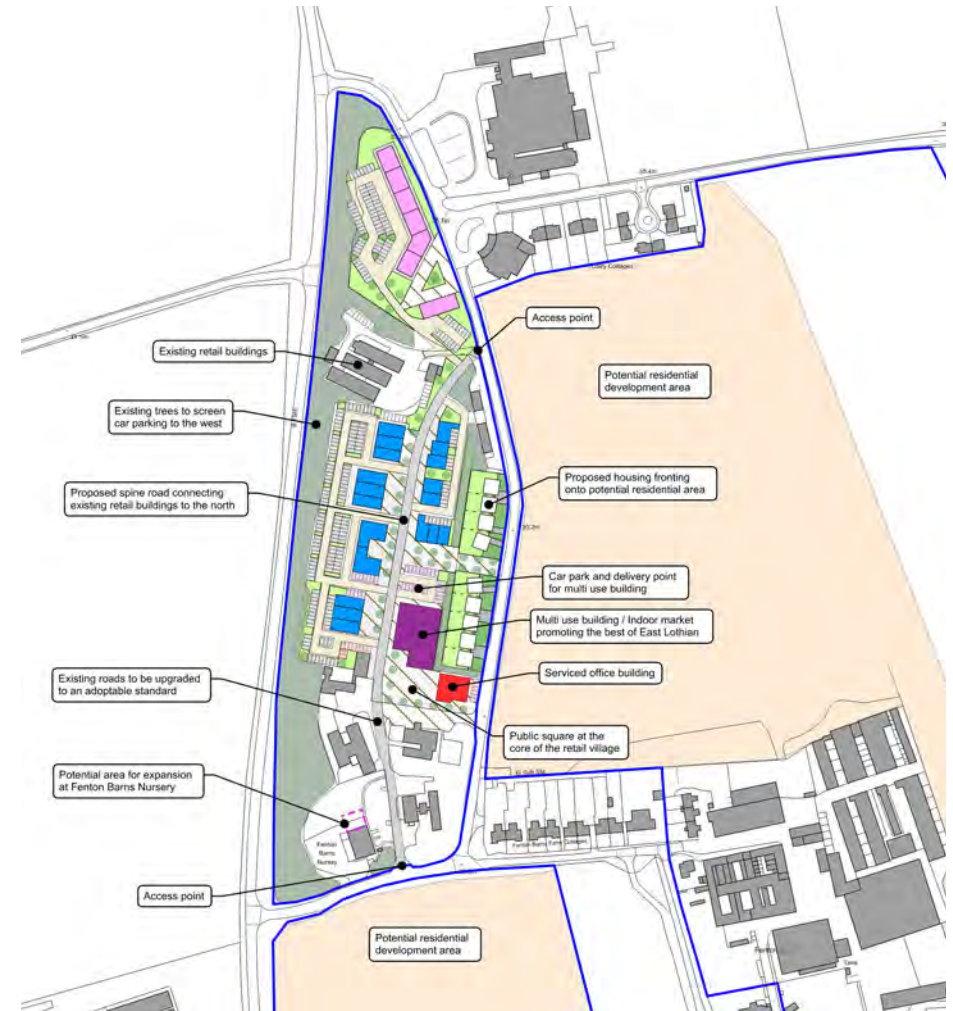
The expanded village will have a substantial greenspace framework. As well as providing a series of parks with connecting paths for pedestrians and cyclists, this will create a series of wildlife corridors. It will also accommodate a series of play areas and links into the surrounding East Lothian countryside.

Substantial structure planting will provide a strong edge to the settlement on its southern approach from Drem and around the boundaries of the expanded village. This screening is also a mitigation measure to reduce any possible disturbance to the Pink Footed Geese.

Further studies are to be commissioned to assess the environmental impacts arising from the development of the village especially for the delivery of infrastructure such as drainage and education as well as considering transport, ecological, archaeological and landscape and visual impacts.



Western commercial area of Fenton Barnes



Retail Village area of Fenton Barnes

Economic expansion at Fenton Barnes has the potential to establish a 140 businesses

## Economic Development

Wallace Land Investments and DC Watson & Sons (Fenton Barns) Ltd has commissioned a Report entitled *Fenton Barns -Realising its Economic Potential*. This is submitted as part of the representations to the Proposed Plan.

The following explains the scale of economic development which could be delivered if the site is allocated for development in the Proposed Plan. The scale of economic development in this proposal is of strategic importance in terms of the Council's *Economic Development Strategy*.

Further economic and retail development at Fenton Barns is uniquely placed to provide additional employment opportunities and help maximise the contribution of this established employment area to the economy of East Lothian.

DC Watson, as landowner, is committed to supporting and expanding Fenton Barns as a key employment location, as part of a wider proposal for a new settlement at this location.

A masterplanning exercise has been carried out to assess the capacity for further economic and retail development at Fenton Barns.

As shown on the plan opposite, there is an opportunity to develop a further 18 commercial buildings for Class 4 use in the western commercial area of Fenton Barns, together with a serviced site for inward investment.

These new buildings have a floorspace of 8,500 sq m (91,500 sq ft), plus a site of 8,650 sq m (93,100 sq ft) of serviced land for inward investment. These 18 commercial buildings could accommodate up to 108 businesses.

A review of the capacity within the Retail Village confirms that a further 19 retail buildings could be provided, along with 7 commercial buildings, a serviced office, and 8 houses (as shown on the plan opposite).

The hub of the Retail Village will be strengthened with the provision of a new building showcasing 'the best of East Lothian produce'. This expansion will add further vitality to the Retail Village. The total new floorspace which could be accommodated is 6,570 sq m. (70,700 sq ft). These premises could accommodate over 30 new businesses.

This capacity assessment demonstrates that DC Watson has the potential to more than double its business and help around 140 new businesses establish themselves or expand in East Lothian.

The scale of accommodation is flexible and helps address the need for business accommodation in East Lothian as identified in the Council's *Economic Development Strategy 2012-2022*. If 140 businesses can be established in the future then this scale of accommodation helps support the need for an additional 350 businesses set out in the Strategy.

The investment to realise this considerable potential can only be realised through additional investment from DC Watson. The designation of an expanded settlement at Fenton Barns provides the mechanism to secure this capital investment.

These economic proposals at Fenton Barns are in accord with the Council's *Economic Development Strategy 2012-2022* and are designed to address some of the key weaknesses identified in this Strategy.

Identifying and designating Fenton Barns as a settlement in the Local Development Plan would be a major step forward in starting to realise this economic potential.

Safeguarding the general location of Fenton Barns and Drem as an opportunity for significant urban expansion in the Local Development Plan to meet future housing requirements would initiate the potential to secure future housing. This would then release much needed capital investment.

The creation of significant new capital investment then allows the landowner to realise the commercial and retail potential highlighted, as well as providing the solution to the existing drainage problems.

An assessment of Economic Benefits undertaken by Turley Economics confirms the significant scale of economic benefits that would be realised through this scale of investment.

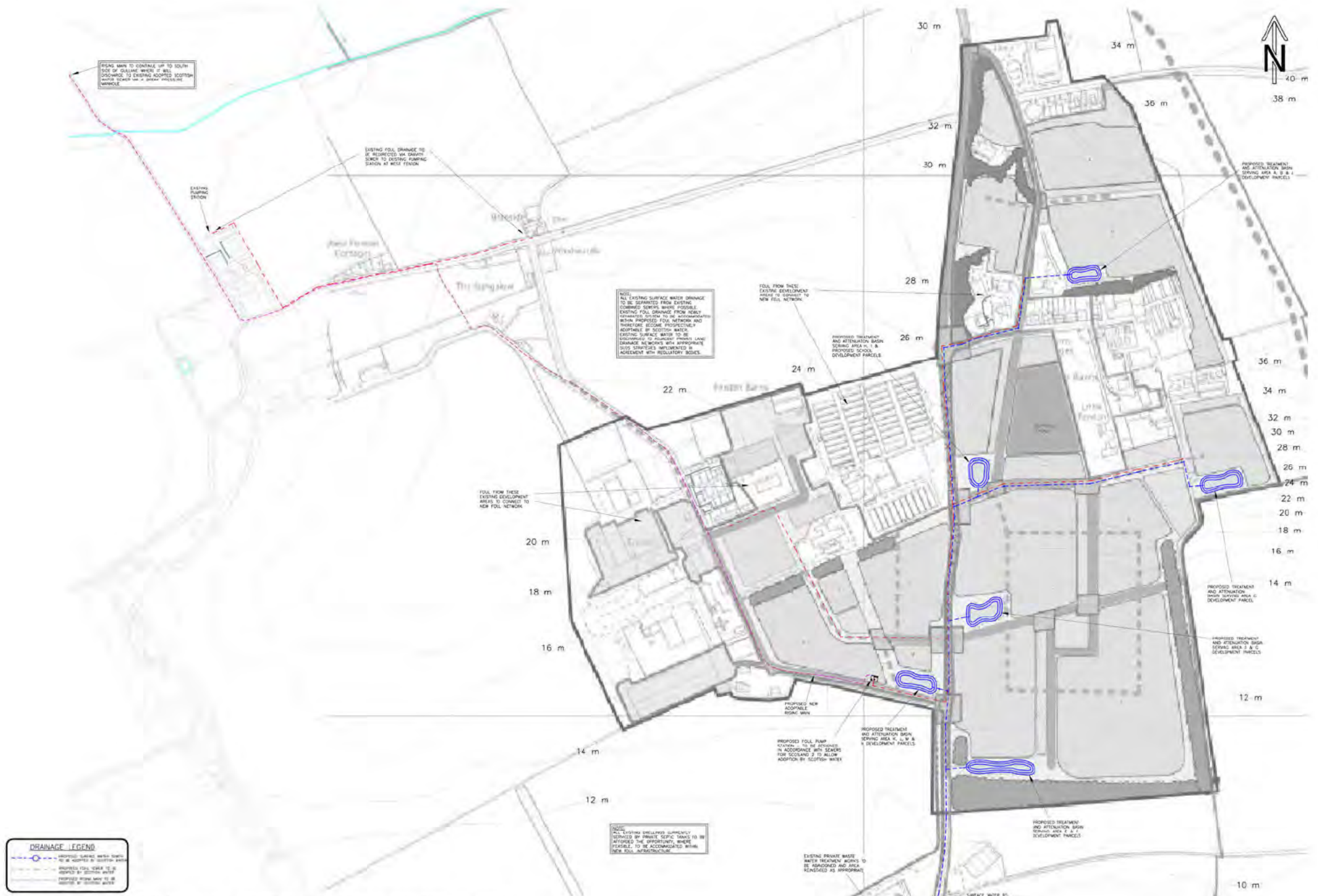
In contrast, proposals put forward by other housebuilders, developers and landowners in response to the LDP Main Issues Report (MIR) do not offer the same scale of economic benefits to the East Lothian economy.

A cornerstone of the Council's development strategy is to promote sustainable development. One of the factors to deliver a sustainable development is providing employment opportunities alongside new housing opportunities. This reduces need to travel for work.

Given that most businesses at Fenton Barns are owned by East Lothian residents, additional job generation is likely to reduce commuting out of East Lothian and enhances East Lothian's job density. The proposal for Fenton Barns is unique in the submissions to the Proposed Plan as it promotes housing with economic development.

Wallace Land Investments and DC Watson & Sons (Fenton Barns) Ltd welcome the opportunity to discuss how this economic potential can be further aligned with the Council's *Economic Development Strategy*.





The proposal for the site includes a series of SuDS measures and new essential infrastructure



## Outline Drainage and SUDS Strategy

At present, the existing Fenton Barns area is predominantly serviced on a combined sewer network. The combined sewer discharges to a private waste water treatment works (WWTW) located south of Fenton Barns, off the B1345 road, and north of the Peffer Burn.

The WWTW was developed along with the drainage network in the area at the time when the site was utilised as an airfield.

Currently, the performance of the private WWTW is well below the expected standards. As such, discharges from the works are known to break the SEPA approved discharge consents for effluent quality to the Peffer Burn.

It is intended to integrate the existing network, where practicable, into the new drainage network for the proposal, allowing the private WWTW to become redundant. The land would then be reinstated and pollution to the Peffer Burn mitigated.

The outline drainage strategy to deliver this is defined as follows and as shown on plan opposite.

## Existing Combined Sewer Networks

The existing combined networks will undergo further survey works to allow removal of the surface water, where practicable, from the system and thus develop a separate foul and surface water drainage system serving existing development areas.

Surface water from the newly separated system will be discharged to adjacent private land drainage networks, with appropriate SuDS strategies implemented in agreement with regulatory bodies.

Foul drainage from the newly separated system will be accommodated into the new foul network for the whole development area. It would become progressively adopted by Scottish Water and discharged to existing adopted Scottish Water infrastructure.

Existing dwellings currently serviced by private septic tank systems will, where feasible, be afforded the opportunity to have their property accommodated in the new infrastructure.

## Proposed Foul Sewer Networks

All proposed development areas will consist of separate foul and surface water sewers. The foul sewers will be designed to accommodate both the new development flows and the foul flows from the existing Fenton Barns areas, once separated from surface water infrastructure.

Sewers will flow via gravity, south, towards the road serving Fenton Steadings, from the B1345, where an adoptable pumping station is proposed. The pump will discharge the effluent, via a pressurised rising main, to an existing adoptable sewer within Scottish Water's network. The exact location will be agreed with Scottish Water at design stage. However, at the present time the expected discharge point is on the south side of Gullane, to the north of Fenton Barns.

All foul sewers, including the pumping station, will be designed and detailed in accordance with Sewers for Scotland 2 making them adoptable by Scottish Water. No foul sewers from the new developments within will be in private ownership.

Discussion with Scottish Water have intimated a *Drainage Impact Assessment* (DIA) will be required for the development proposal and Wallace undertakes to fund this process. Thereafter, the DIA will look to conclude what development can progress without detrimental effect on the existing network and, within reasonable cost parameters, the client will fund upgrading of Part 2 Assets (existing network) to suit.

## Surface Water Sewers and SUDS

Development is to be designed in accordance with the SuDS Manual, Sewers for Scotland 2 and East Lothian Council Flood design criteria.

As development exceeds 50 homes, 2 levels of treatment will be provided to run-off from residential roads and a single level of treatment for roofs. In commercial areas, 2 stages of treatment will also be provided, as parking spaces serving same are expected to fall below 50 spaces.

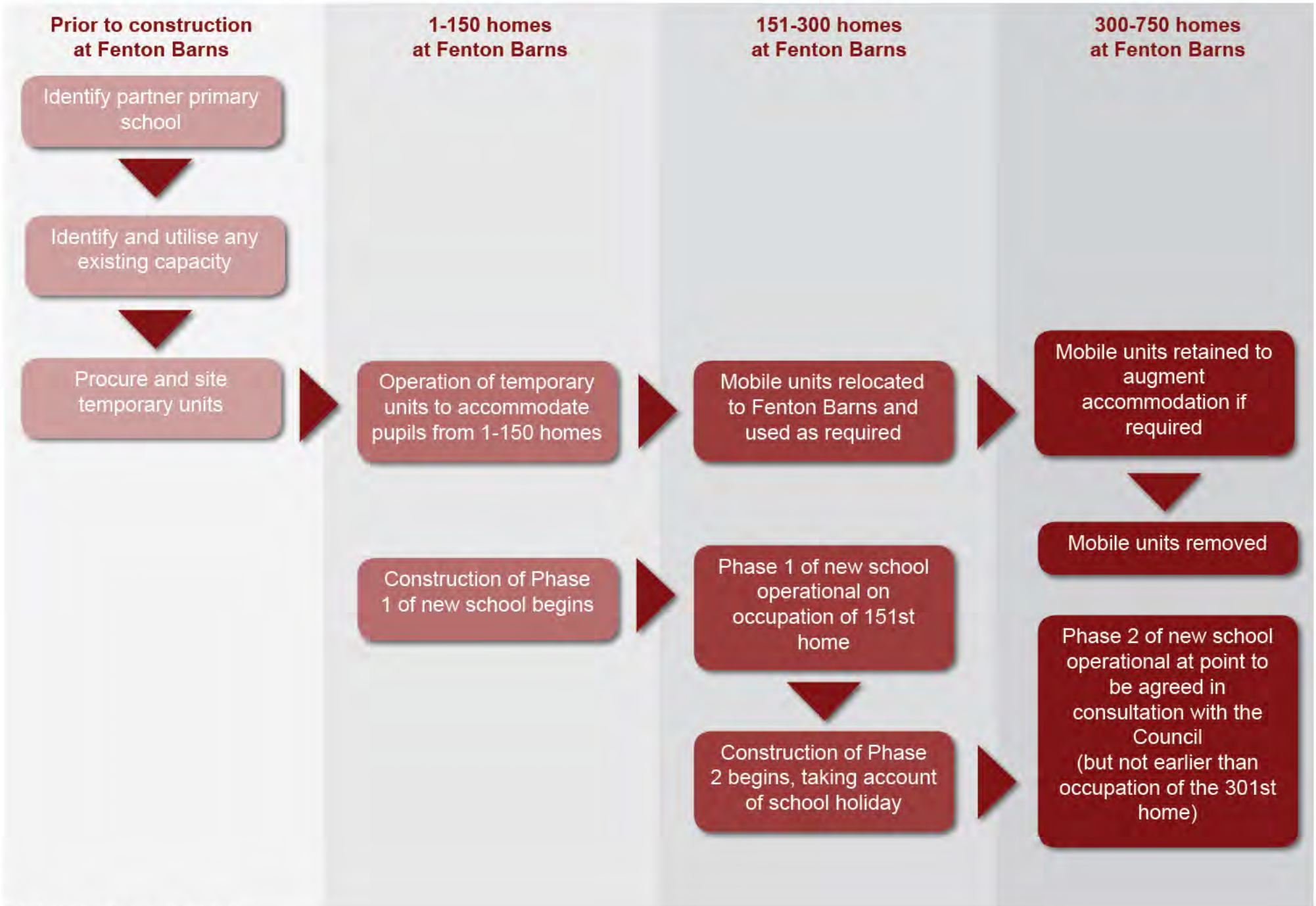
To satisfy Scottish Government guidelines *Delivering Sustainable Flood Risk Management* (published June 2011), the strategy aims to treat run-off from impermeable surfaces as close to source as possible and maximise opportunities to manage surface water before it enters the sewer system.

All adoptable roads will discharge to roadside filter strips or swales, prospectively adopted by East Lothian Council, giving a 1st level of treatment. Where appropriate, and in lieu of roadside filters / swales, an end of pipe swale will be provided giving a first level of treatment to all roads and roofs. This feature would be designed to be prospectively adoptable by the Council.

All roof, private parking areas and adoptable roads (after first stage treatment) surface water will be collected by prospectively adoptable sewers and to then flow through detention basins, thus providing a maximum of two stages to surface water run-off.

Detention basins will attenuate forward flow rates back to pre-development greenfield run-off rates, controlled via proprietary hydrobrakes, to mitigate downstream issues. Detention basins will be designed to accommodate requirements set by the SuDS Manual and detailed to be adopted by Scottish Water

The surface water network, including attenuation, will be designed for a 1 in 200 year return period storm, all durations, plus 20% climate change.



Indicative delivery of a new primary school

## Education Infrastructure Upgrade

The site lies within the non-denominational catchment areas for Gullane Primary School and Direlton Primary School. North Berwick High School is the catchment non-denominational secondary school.

The DER confirmed that there is some scope to expand Gullane Primary School, Land is safeguarded for future expansion of North Berwick High School.

This proposal incorporates the phased delivery of a new Primary School. As part of the indicative proposal for the phased delivery of the new school, it is proposed that temporary accommodation is provided at Gullane Primary School until the first phase of the new Fenton Barns school is opened. The proposal for the delivery of the new school is explained in more detail below.

### *Temporary School Off Site*

It is proposed that primary education for Fenton Barns is initially provided off site at Gullane Primary School. This temporary solution would allow a viable school population to be established within the education environment of an existing catchment school.

There is also scope to provide up to three mobile, temporary units within the Primary School grounds.

These mobile units would be utilised to provide at least 2 classrooms and additional administration accommodation. These mobile units would provide capacity for up to 50 pupils. Using the Council's *Child Per House Ratio*, this is equivalent to around 150 new homes.

This temporary arrangement would cease when Phase 1 of the new school is built, potentially prior to the occupation of the 151st new home at Fenton Barns. It comprises 4 classrooms, PE hall/dining hall and administration space to include reception, staff room, and storeroom.

### *Phase 1 of New School on Site*

Phase 1 is likely to comprise composite classes with variations in age groups.

The 4 teaching spaces could accommodate 100 pupils based on the 25 pupil maximum class size. Actual class sizes may be lower and teaching capacity likely to be around 85 pupils due to the nature of composite classes.

The design of Phase 1 would be flexible in order to accommodate the requirements of a single stream school. The design of the school would be required to accord with Scottish Government Guidance *Determining Primary School Capacity* (October 2014).

The temporary accommodation of 3 mobile units would then be removed from Gullane Primary School and transferred to the site at that point.

These mobile units will be used for further school requirements as required until the second phase is built.

### *Phase 2 of New School*

The timing of Phase 2 of the new school would be determined in due course in consultation with the Council. Based upon the proposed approach, this is unlikely to be required prior to the occupation of the 301st new home at Fenton Barns.

The new school at Fenton Barns would provide sufficient capacity for the number of homes proposed. The required catchment review for the new school would affect few existing pupils.

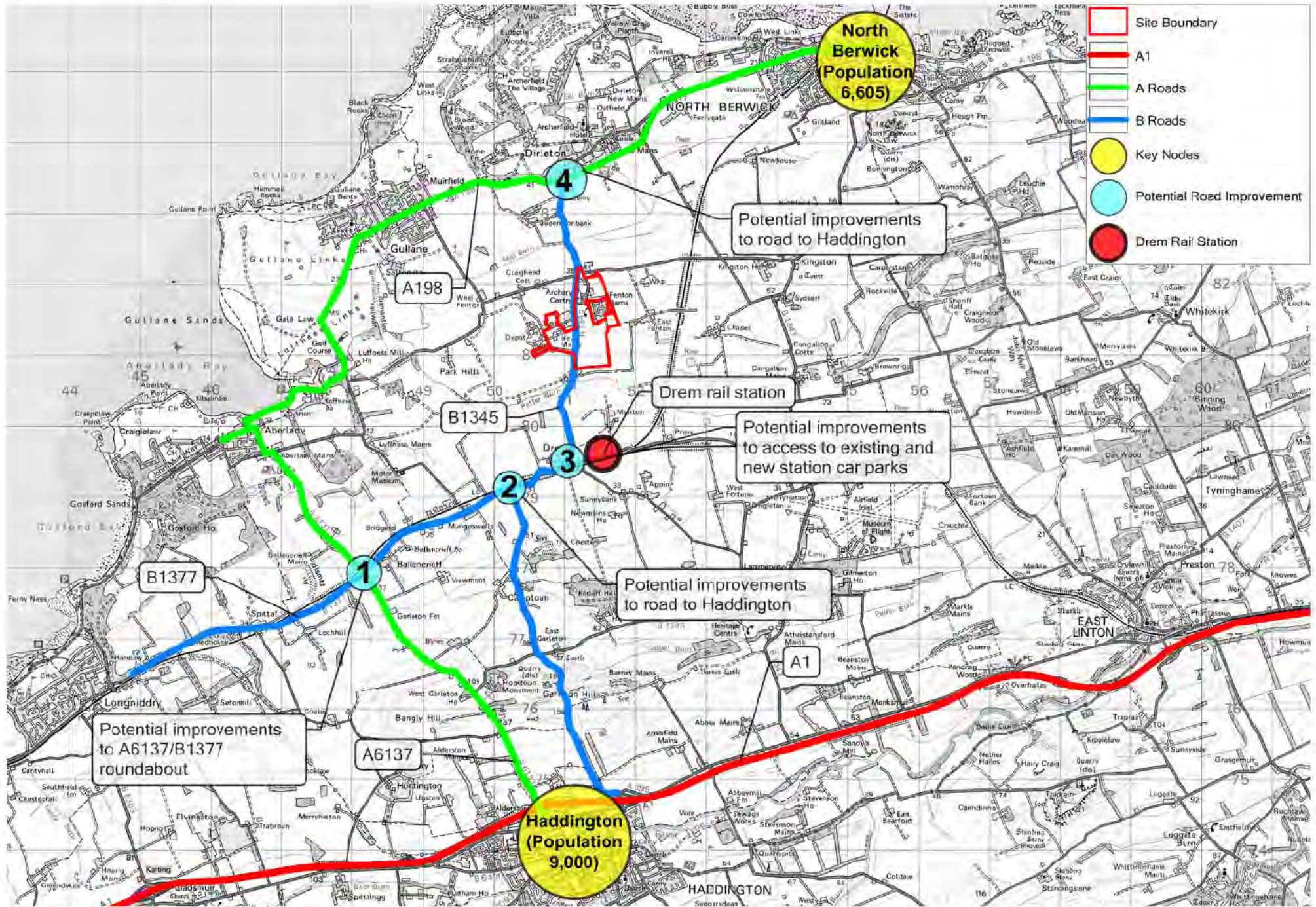
### *Secondary Schooling*

The LDP safeguards land required for an extension to North Berwick High School. This will ensure that provision can be made for non-denominational secondary school provision.

## Conclusion

This phased approach will be able to provide sufficient education capacity available to accommodate the proposal.





Local Traffic Appraisal



## Appraisal of local road network

The local road network surrounding Fenton Barns is a mixture of both A and B class roads.

The site is bisected by the B1345 which links the village of Drem to the A198 near to Dirleton. The B1345 is a typical rural B class road with grass verges and hedges along its length.

The B1345 has a number of field accesses and minor junctions along its length, as well as the main access points in and adjacent to Fenton Barns.

The B1345 passes through the village of Drem where it provides both local access to residential properties as well as a direct access to the Drem Station car park.

The B1345 is subject to a 60mph speed limit along most of its length. However, this is reduced at certain points such as through the villages of Drem and Ballencrieff where the speed limit is reduced to 40mph.

There have been seven *slight* and one *serious* reported injury accidents in the past five years between Drem and Fenton Barns.

Virtually all of these accidents have involved multiple vehicles. Based upon the accident statistics available there is no distinct pattern of accidents and no individual area which appears to be problematic. The majority of the recorded injury accidents can be attributed to driver error.

The B1377 runs from Drem in an east west direction and provides a link to East Linton in the east and Longniddry in the west.

The B1377 is similar in nature to the B1345 and is a typical rural B class road, with its geometry and alignment commensurate with its function and form.

There have been seven *slight* reported injury accidents in the past five years along the section of the B1337 between Drem and the Ballencrieff roundabout. There have also been four *slight* reported injury accidents at the Ballencrieff roundabout in the past five years.

To the north of Fenton Barns, the A198 provides an east west route which links the town of North Berwick, in the east, with the villages of Dirleton, Gullane, Aberlady, Longniddry and eventually terminating at Tranent.

The A198 is a typical semi-rural A class distributor road with good vertical and horizontal geometry. The A198 is subject to a 60mph speed limit except where it passes through local villages and towns.

Due to the higher volumes of traffic using the A198, the level of reported injury accidents is commensurate with the level of traffic.

At the section of the A198 to the west of the junction with the B1345, there have been, one *fatal*, two *serious* and two *slight* reported injury accidents in the past five years. These are clustered at the S bends to the west of the B1345 suggesting that there may be an issue with the geometry of this section of the A198.

The A6137 joins the B1345 to the west of the village of Ballencrieff at a small at-grade roundabout. The A6137 provides direct access to the town of Haddington, to the south and Aberlady to the North.

As with the other A class roads in the area, the A6137 has good vertical and horizontal geometry and is subject to a 60mph speed limit.

There have been a total of one *serious* and nine *slight* reported injury accidents on the section of the A6137 towards Haddington and one *serious* and four *slight* reported injury accidents on the northern section of the A6137 towards Aberlady.

There is also a popular local access route from Drem to Haddington which utilises a U class road to the west of Drem. This road passes Chester Hill Fort and Camptoun before joining the A199 and A1 to the north of Haddington.

This popular route for locals has had a total of one *serious* and one *slight* reported injury accidents in the past five years.



Drem train station is accessible from Fenton Barnes



## Sustainable transport proposal

One of the principles of the Masterplan for Fenton Barns is to create an area where place and people takes precedent over vehicular movement. On this basis, the nature of the B1345 through the new settlement is changed to form a village street.

In order to achieve this, two “gateway” features are proposed at the north and south of the village. These will help to inform traffic that it is entering a village and that vehicle speeds and priorities have changed.

The proposal has been designed to provide primary nodes, on-street parking and pedestrian crossing points at key locations adjacent to the village centre retail and local amenities and at school node points.

Frontage access to residential dwellings, along the B1345 is provided, introducing built form to emphasise the urban character of the village.

Access for pedestrians and cyclists will be designed to encourage local movements by these modes. High quality pedestrian and cycle links or shared surfaces will be provided through residential areas.

Access to existing and proposed employment uses will be designed with appropriate junction access points.

*Designing Streets*, and its guidelines, have been followed in the development of the proposals.

As part of the Transport Assessment, consideration will be given to improving the layout of the Ballencreiff roundabout, the access to the U class road to the west of Drem which provides a link to Haddington.

Consideration will also be given to improving the existing access to the station car park and the proposed new station car park access within Drem.

Finally, the junction of the B1345 and A198 will be assessed and improvements made, where required, to accommodate the proposals and with the potential to improve the overall nature of this section of the A198.

## Improving public transport services

There are currently two bus services which provide a service for Fenton Barns. These are Service 121 (Eve Coaches), and Service 127 (East Coast Buses). Service 111 (Prentice Coaches), passes through Fenton Barns but currently only stops at Drem Station. Service 111 provides a connection to the Royal Infirmary in Edinburgh.

Service 121 provides a route between Haddington and North Berwick.

The service is limited, typically a two hour frequency. However, the service and timing does cater for school children to North Berwick High School and for commuters to North Berwick, with services which reach North Berwick before 9am.

Commuting from Fenton Barns to Haddington to arrive before 9am is not possible with Service 121.

Improvements to the frequency of bus services will be supported.

Service 127 is a school service which runs from Longniddry through Drem and Fenton Barns to North Berwick High School. There is one service in the morning and one service in the afternoon to coincide with school times.

Service 111 is a service which runs from Haddington to the Royal Infirmary in Edinburgh, passing through Longniddry Station, Preston Pans Station, Wallyford Station and Musselburgh.

The proposed scale of development will increase the potential customer base for bus services. Therefore, the frequency and overall access to public transport can be improved.

Drem Station lies only 1.6 miles from the Fenton Barns Masterplan site. Drem Station currently provides for services to North Berwick in the east and Edinburgh in the west.

There is also the potential to use a limited service which runs through Drem to Motherwell and Glasgow.

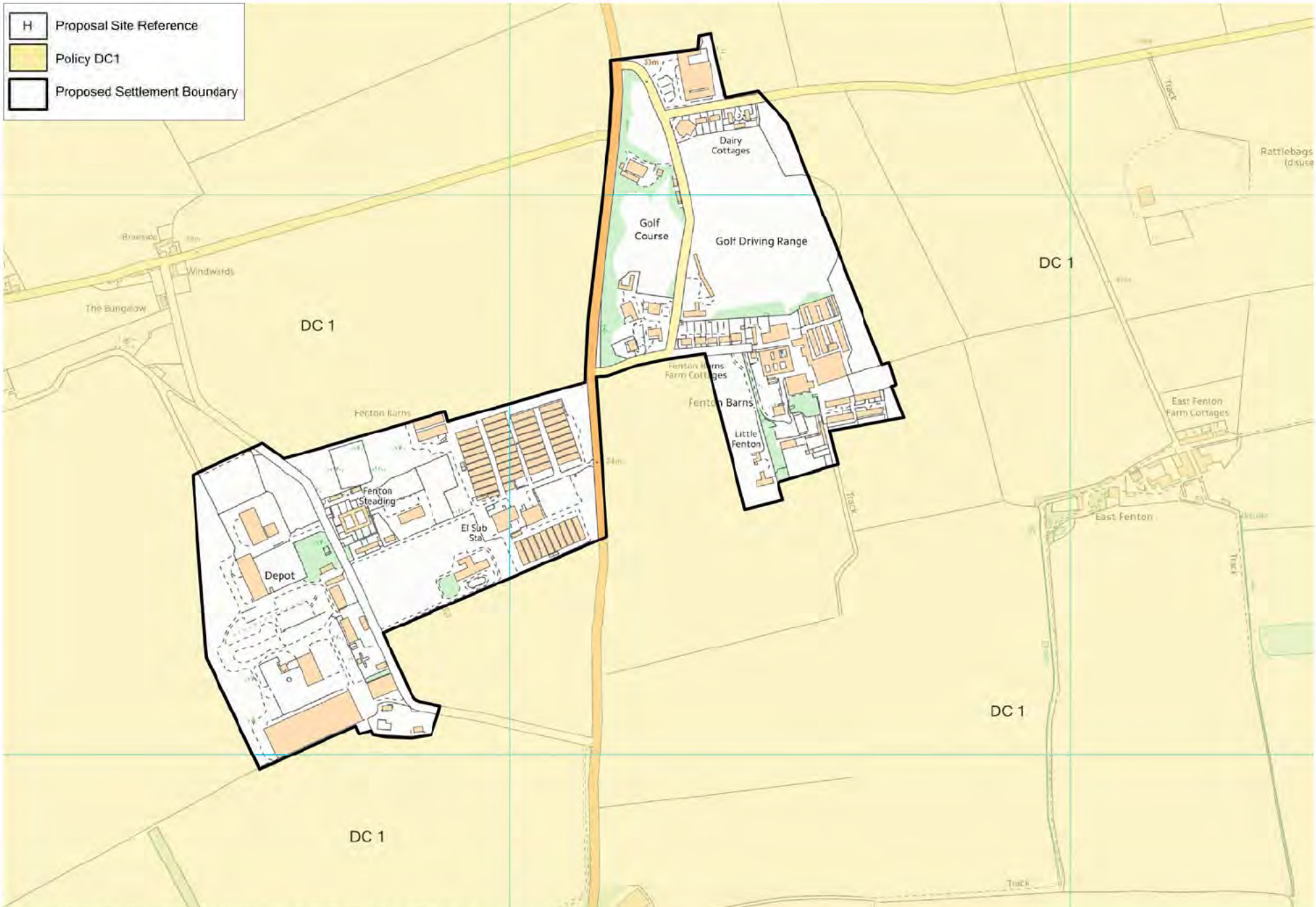
There are five services to Edinburgh in the morning peak which would allow commuters to arrive in the centre of Edinburgh typically before 9am.

There are similarly five services from Edinburgh which would allow commuters to arrive at Drem before 7pm.

Trains to North Berwick are less frequent with only two commuters services arriving in North Berwick before 9am and a similar service from North Berwick arriving in Drem before 7pm.

The station car park at Drem is currently well used and at capacity. However, it is understood that the Council has plans to extend the station car park in an area to the south west of the village.

This new car park will cater for both the existing demand at the station but importantly will provide a sustainable transport option for expansion at Fenton Barns.



Recommendation to Proposed Plan for Fenton Barnes to be designated as a Settlement.



## 9. Recommendation for Proposed Plan

### **Designating Fenton Barns as a Settlement**

The existing area of Fenton Barns extends to 56ha 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.

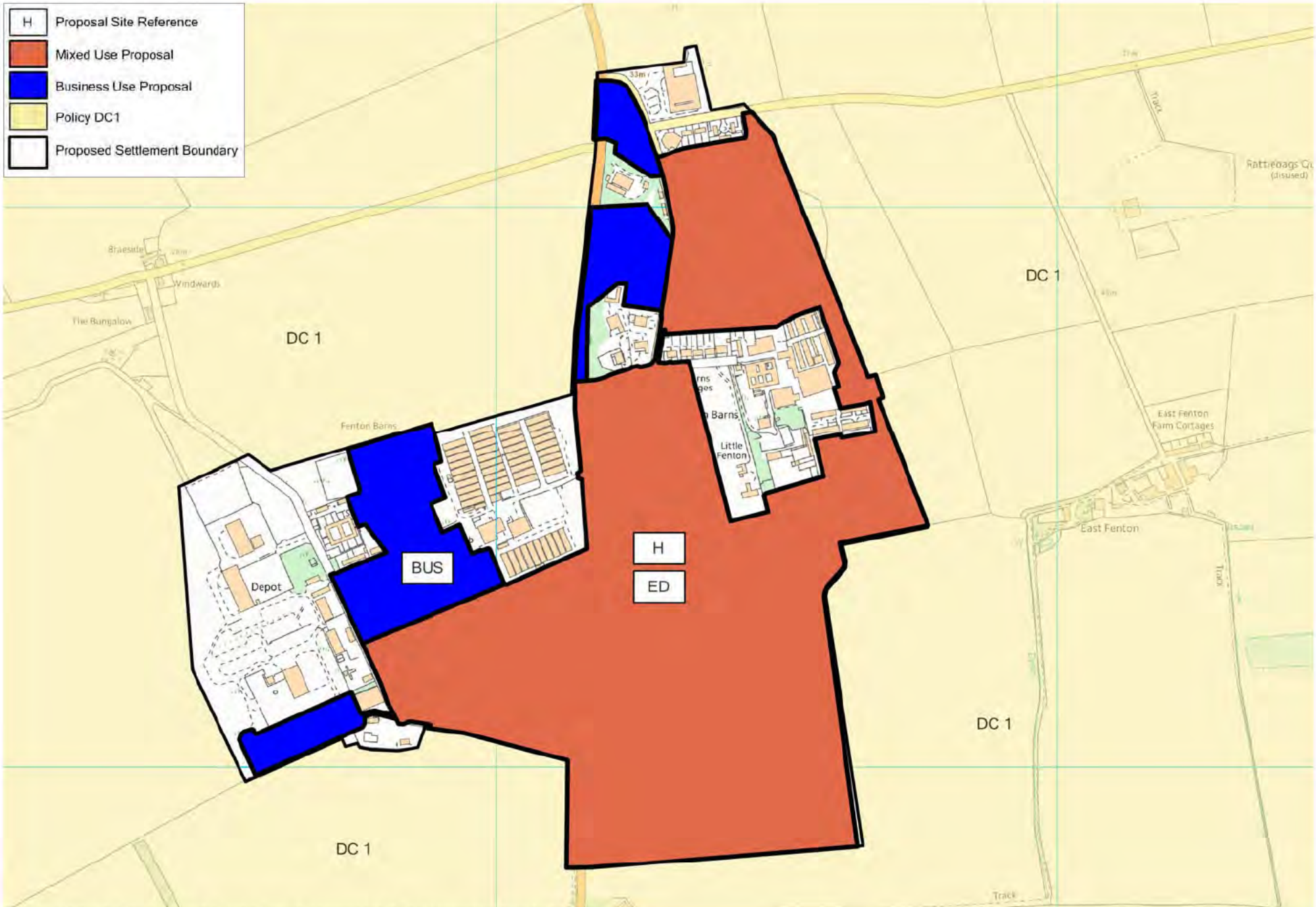
In comparison, existing settlements such as Kingston (2ha) or Humble (3.2ha) are already designated in the adopted Local Plan.

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 economic development in this location will continue to be treated as *Development in the Countryside* and contrary to the development plan.

Designation as a settlement supports 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.

	Proposal Site Reference
	Mixed Use Proposal
	Business Use Proposal
	Policy DC1
	Proposed Settlement Boundary



Recommendation to Proposed Plan for Fenton Barns to accommodate further economic and residential development.

### **Benefits of a mixed use allocation at Fenton Barns**

This Development Framework Report highlights the benefits for East Lothian if the land at Fenton Barns is allocated as a new settlement in the Proposed Plan with a scale of up to 1,000 new homes and other uses.

The policy appraisal confirms that the designation of the existing built up area, plus additional greenfield land is part of the East Lothian SDA.

Further expansion in Fenton Barns supports existing economic development (supporting up to 550 jobs) by providing much needed investment in drainage infrastructure to resolve existing issues.

The establishment of an expanded settlement continues to support further economic development at Fenton Barns. It offers the added advantage that the range of services and facilities in a new village offers a more sustainable solution for working at Fenton Barns.

The proposal can deliver all additional infrastructure requirements including drainage and education. There is no significant adverse impact on the existing road infrastructure.

The scale of settlement, proposed at up to 1,000 homes, delivers a range of services to support the sustainability of the location. It also delivers a viable and effective site.

Many of the homes proposed will be built during the LDP period.

Concentrating this scale of development at Fenton Barns funds necessary infrastructure and avoids additional development being required in other towns in the North Berwick cluster. It also reduces development pressure on neighbouring villages such as North Berwick, Dirleton, Gullane and Aberlady.

### **Recommendation for the Proposed Plan**

Fenton Barns should be designated as a settlement in the Proposed Plan. The allocation of a further mixed use development as shown in the plan opposite. A policy in the Proposed Plan would guide its future development through a master planning brief.

In the absence of designating Fenton Barns as a settlement and allocating land for a mixed use development, it is recommended that the Council establishes the location for longer term growth adding the following text to the Proposed Plan after paragraph 2.154:

*This should recognise that Fenton Barns has a role to play as a mixed use location, and that residential led development at Fenton Barns could lead to investment in the creation of further small businesses and speciality retailing, together with a primary school, open space and landscaping etc.*







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