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Additional information:

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

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

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Proposed East Lothian Local Development Plan Schedule 4 Representation Responses

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

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

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

For further information or advice, please contact:

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

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-04 17:32:49**

About You

1 What is your name?

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

Developer/ agent/ landowner

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

Organisation:

Clarendon

Your role:

Consultant for The BS&S Group

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

Object to the non-inclusion of site at South Gateside, land north of A6093, Haddington. Part of the site was promoted via the MIR but the site boundary has now been extended to include a logical extension of the settlement. Also, an objection to the proposed Countryside Around Towns designation west of Haddington.

Section 2e - Haddington Cluster Strategy Map (pg 39)

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

Modifications(s) Sought:

Addition of new housing site at South Gateside, land north of A6093, Haddington as detailed below. Deletion of Countryside Around Towns designation to associated land west of Haddington.

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

Justification for Modification(s):

The representation introduces a potential residential expansion area on the western edge of Haddington ("South Gateside") and seeks inclusion as a mixed-use (housing and associated community uses) proposal within the Spatial Strategy for the Haddington Cluster (with associated amendments to LDP Table HOU1,

Haddington proposals map and LDP Action Programme).

In this respect, it is considered that the site presents a short and longer term settlement expansion opportunity to contribute towards East Lothian's strategic housing land requirement including the need to maintain a 5 year supply of effective housing land.

The site adjoins allocated housing sites at Letham Mains (LDP Proposal HN1) and the representation is being brought forward due to significant delays in implementing the first phase of this site along with the current effective land supply shortfall. The proposed site offers an opportunity for a dual approach to new housing in this location to accelerate delivery.

The overall site includes the allocated Letham Mains extension site (Proposal HN2) and land to the immediate west of this allocation, extending north and south of Letham Mains Smallholdings. The site is bound by a woodland belt and Letham Burn to the north, the aforementioned allocated housing site to the east, the A6093 Pencaitland Road to the south and a minor road, woodland edge and field boundary to the west.

The extent of the land subject of this representation is illustrated in Figure 1 of the supporting document (emailed).

The site and adjoining area is located within the East Lothian Strategic Development Area, as defined by the approved Strategic Development Plan. The site is therefore within an approved focus area for future growth where it will be necessary to realign the existing settlement boundaries to facilitate planned growth, as per proposed allocations in the Proposed LDP.

The eastern part of the site was promoted via the LDP Main Issues Report stage and now forms Proposal HN2 (275 homes) as an extension to the existing Letham Mains allocation. Part of the western area was promoted via the MIR (ref.MIR/HN/HSG125) but the boundary has been expanded to provide a more logical extension.

In addition to the 275 homes to be accommodated within Proposal HN2, the proposed site could accommodate approximately 480 additional homes (plus supporting community uses to be agreed), split into two development areas north and south of the existing small-holdings, as detailed below.

The Spatial Strategy for the Haddington Cluster proposes significant westwards growth for the town, including Letham Mains (Proposal HN1 and HN2, the latter forming part of this representation), Gateside (Proposal HN4, HN5 and HN6) and Dovecot (Proposal HN3) . Given physical restrictions to growth in other directions (topography, golf course, A1, protected landscapes), the only feasible option for further growth of the settlement in westwards.

In this respect, Paragraphs 2.114 and 2.116 of the LDP are contested in that future expansion of Haddington should be catered for over and above the Dovecot allocation.

The proposed new housing site continues this westwards expansion of Haddington.

The eastern part of the promoted site (Proposal HN2) was assessed by the Council via a Site Assessment contained within Appendix 5 of the LDP Environmental Report (as was the main Letham Mains allocated site, Proposal HN1).

The assessment notes the likely change to landscape character but scope to integrate development through high quality landscaping including landscaped boundaries of native hedgerow and trees.

This approach could also be reflected in the proposed new housing sites with the existing strong landscape framework to be augmented by additional planting. The intention would be to retain the character of the existing small-holdings and provide a green buffer between this area and proposed new housing. The site boundaries and access options provide for distinct development zones with the southern site adjoining the A6093 as a Phase 1 (300 units) and the northern part of the site a lower density Phase 2 (180 units) .

Whilst full landscape, design and technical assessment would be forthcoming via detailed studies currently being commissioned by the landowners, an Indicative Design Framework is provided at Figure 3 for information to provide initial visual communication of how the land could be integrated with adjoining development proposals.

As detailed hereafter, East Lothian have not identified sufficient housing sites. Haddington is one of the principal towns within the East Lothian Strategic Development Area and the proposed site can be delivered on a staged basis with Phase 1 providing a short term opportunity to contribute to housing land requirements.

As such, BS&S Group object to the current Spatial Strategy for the Haddington Cluster and seek inclusion of the proposed housing sites as illustrated within the supporting document with associated amendments to Table HOU1 with revisions sought as per the following,

Site Effectiveness Summary

PAN2/2010 criteria for assessing site effectiveness provide a test against which sites require to be gauged with the land at Haddington considered effective, being free of potential site constraints and able to deliver units within the plan period. Specifically:-

Ownership

The site is owned by a willing seller.

Status: Effective

Physical

The site is not known to be restricted by any physical factors which would preclude development. Site access can be taken from the A6093 Pencaitland Road with

scope for a new roundabout to serve the allocated Letham Mains extension, the westwards expansion and existing smallholdings.

Status: Effective

Contamination

The site, given its greenfield arable nature, has been deemed to have a low risk of contamination.

Status: Effective

Deficit Funding

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

Status: Effective

Marketability

The Edinburgh housing market remains a highly marketable location with demand for both private and affordable units confirmed via the SESplan Housing Needs and Demand Assessment. The proposed site could be programmed for completion within the LDP period (including a contribution to the pre-2019 SESplan period). Based on the estimated capacity of 300 units in Phase 1 and 180 units in Phase 2 and an estimated site start in late 2017/early 2018 (planning approval in mid/late 2017), the site could provide a significant contribution to pre-2019 housing requirements and be largely developed within a five year timescale.

Status: Effective

Infrastructure

The proposal can improve service utility connections (sewage) for the local area.

Status: Effective

Land Use

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

Status: Effective

Overall, there are no known constraints which will hinder delivery of housing completions within the LDP period.

In order to demonstrate deliverability, the BS&S Group have submitted a Proposal of Application Notice and Environmental Impact Assessment Screening Request to East Lothian Council for the extended development area.

The intention is for pre-application meetings with the Council (and EIA screening) to determine the exact requirement for supporting studies with work commissioned thereafter.

Preparation of key studies will be conducted in early 2017 which will allow for an application pack to be ready by Spring 2017.

The BS&S Group wish to work with the Council in terms of the Local Development Process and are investing in the above work to demonstrate deliverability as part of a twin-track approach.

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

1a PROP HN1: Letham Mains, Haddington - What modifications do you wish to see made to Prop HN1 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

1b Please give any information/reasons in support of each modification suggested to Prop HN1 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

2a PROP HN2: Letham Mains Expansion, Haddington - What modifications do you wish to see made to Prop HN2 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

BS&S Group object to the current development brief/phasing of Proposal HN2 with this site to form part of the proposed area capable of short term development, accessed via the A6093.

2b Please give any information/reasons in support of each modification suggested to Prop HN2 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

The supporting document (emailed) outlines how Proposal HN2 can form part of a wider development area capable of being accessed via the A6093. This would allow a twin-track approach to development in the Letham Mains area to assist with housing delivery.

3a PROP HN3: Land at Dovecot, Haddington - What modifications do you wish to see made to Prop HN3 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next

question.

Modifications(s) Sought:

3b Please give any information/reasons in support of each modification suggested to Prop HN3 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

4a PROP HN4: Land at Gateside East, Haddington - What modifications do you wish to see made to Prop HN4 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

4b Please give any information/reasons in support of each modification suggested to Prop HN4 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

5a PROP HN5: Land at Gateside West, Haddington - What modifications do you wish to see made to Prop HN5 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

5b Please give any information/reasons in support of each modification suggested to Prop HN5 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

6a PROP HN6: Gateside West Haddington- What modifications do you wish to see made to Prop HN6 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

6b Please give any information/reasons in support of each modification suggested to Prop HN6 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

7a PROP HN7: Land at Alderston, Haddington - What modifications do you wish to see made to Prop HN7 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

7b Please give any information/reasons in support of each modification suggested to Prop HN7 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

8a PROP HN8: Land at Peppercraig East, Haddington- What modifications do you wish to see made to Prop HN8 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

8b Please give any information/reasons in support of each modification suggested to Prop HN8 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

9a Policy HN9: Development Briefs - What modifications do you wish to see made to Prop HN9 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

9b Please give any information/reasons in support of each modification suggested to Policy HN9 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

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

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

Modifications(s) Sought:

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

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

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

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

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

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

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

Justification for Modification(s):

Paragraph 3.31 – To reflect Scottish Planning Policy

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

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

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

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

- 2,115 completions are programmed from LDP sites in the period to 2019 which is split as 790 in 2017/18 and 1,325 in 2018/19 (HTN Table 14) - this would result in overall annual completions of 1,652 and 2,012 in these respective years (HTN Table 15) in comparison to the highest recorded figure of 867 (2006/07) and 2009-15 average of 340.
- 2,906 completions are programmed between 2019-24 which is split 990-530-445-435-506 from 2019-24 (HTN Table 14) - this results in overall annual completions being in excess of the highest ever recorded for three years (2019-22) as per HTN Table 15
- HTN Appendix 2 sets out estimated programming of Proposed LDP sites which supports the aforementioned figures for the two respective time periods. It is appreciated that this has been reviewed since the Main Issues Report stage. However, it is noted that an estimated 790 completions are programmed on 35 No. LDP sites in 2017/18 with a further 1,325 completions programmed for 2018/19. This will require planning approvals with agreed legal agreements and associated infrastructure (school) provision to allow for site starts by October 2017 at the latest. This is still highly optimistic given the LDP examination requirements in 2017 along with associated impact on infrastructure programming.
- Programming of LDP sites is not yet agreed with the development industry and the 2015 Housing Land Audit presents the most up to date assessment of supply.
- To counter the real risk that further slippage will occur in implementing the proposed allocations, further sites should be allocated/approved to increase the chances of strategic targets being achieved.

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

Modifications(s) Sought:

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

Justification for Modification(s):

3a Maintaining an Adequate Effective Five-Year Housing Land Supply - What modifications do you wish to see made to the Maintaining an adequate Effective Five-Year Housing Land Supply section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

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

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

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

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

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

3b Please give any information/reasons in support of each modification suggested to the Maintaining an Adequate Five-Year Housing Land Supply section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

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

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

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

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

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

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

5b Please give any information/reasons in support of each modification suggested to the Specialist Housing Provision & Other Specific Needs section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

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

1a Diverse Countryside & Coastal Areas - What modifications do you wish to see made to the Diverse Countryside & Coastal Areas section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Your justification for this will be sought in the next question

Modifications(s) Sought:

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

Justification for Modification(s):

Proposals Map

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

Modifications(s) Sought:

Inset Map 20 (Haddington)

Deletion of Countryside Around Towns designation to west of Haddington.

Addition of proposed housing allocation at South Gateside, land north of A6093, Haddington as per below.

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

Justification for Modification(s) :

As set out in response to Haddington spatial strategy and supporting document (emailed) The proposed site can accommodate settlement expansion while protecting key local landscape qualities.

Visual Upload:

Haddington - Indicative Design Framework.pdf was uploaded

Visual Upload:

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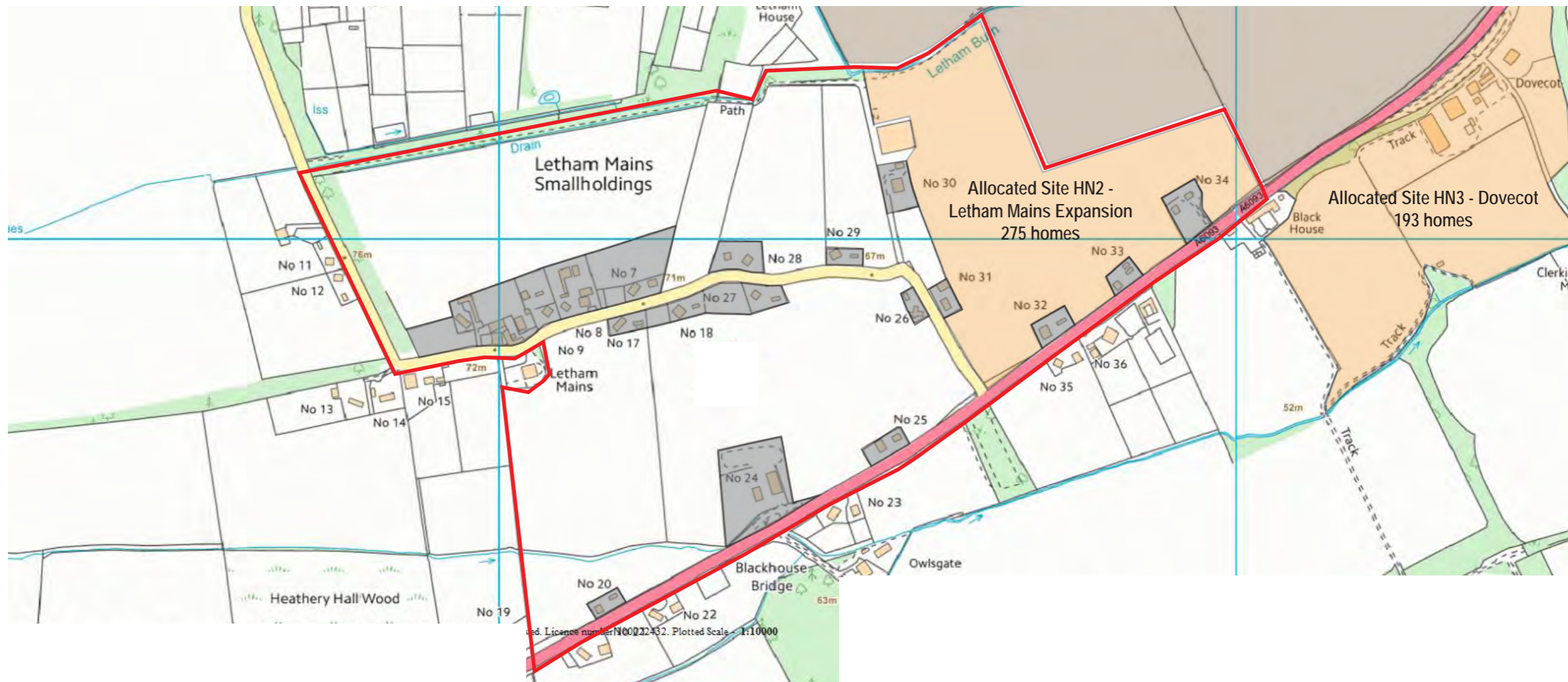
Representation to East Lothian Proposed Local Development Plan

In Support of
South Gateside (land north of A6093), Haddington

Prepared by
Clarendon Planning and Development Ltd

On behalf of
BS & S Group

November 2016



3	Introduction & Proposal
4	Section 1: Aims, Objectives & Outcomes
5	Section 2: Spatial Strategy
7	Section 3: Growing our Economy & Communities - Planning for Housing
9	Section 3: Growing our Economy & Communities - Education & Community
9	Section 4: Our Infrastructure & Resources - Transport
10	Section 5 - Diverse Countryside & Coastal Areas - Countryside Around Towns
11	Environmental Report Appendix 8 - Site Assessment Comparison
12	Conclusions - A Deliverable Site: - Site Effectiveness Summary - Proposal of Application Notice - Summary

This representation to the East Lothian Proposed Local Development Plan (LDP) has been prepared by Clarendon Planning & Development Ltd on behalf of BS&S Group.

The representation introduces a potential residential expansion area on the western edge of Haddington (“South Gateside”) and seeks deletion of the proposed ‘Countryside Around Towns’ policy designation and inclusion as a mixed-use proposal within the Spatial Strategy for the Haddington Cluster (with associated amendments to LDP Table HOU1, Haddington proposals map and LDP Action Programme).

In this respect, it is considered that the site presents a short and longer term settlement expansion opportunity to contribute towards East Lothian’s strategic housing land requirement including the need to maintain a 5 year supply of effective housing land.

The site adjoins allocated housing sites at Letham Mains and a Proposal of Application Notice has been submitted to include the Letham Mains expansion site (LDP Proposal HN2).

The representation is being brought forward due to significant delays in implementing the first phase of housing at Letham Mains (LDP Proposal HNI) along with the current effective land supply shortfall. The proposed site offers an opportunity for a dual approach to new housing in this location to accelerate delivery.

Relevant sections of the Proposed LDP and supporting documentation are addressed below.

The overall site includes the allocated Letham Mains extension site (Proposal HN2) and land to the immediate west of this allocation, extending north and south of Letham Mains Smallholdings. The site is bound by a woodland belt and Letham Burn to the north, the aforementioned allocated housing site to the east, the A6093 Pencaitland Road to the south and a minor road, woodland edge and field boundary to the west.

The extent of the land subject of this representation is illustrated in **Figure 1**.

The site and adjoining area is located within the East Lothian Strategic Development Area, as defined by the approved Strategic Development Plan. The site is therefore within an approved focus area for future growth where it will be necessary to realign the existing settlement boundaries to facilitate planned growth, as per proposed allocations in the Proposed LDP.

The eastern part of the site was promoted via the LDP Main Issues Report stage and now forms Proposal HN2 (275 homes) as an extension to the existing Letham Mains allocation. Part of the western area was promoted via the MIR (ref.MIR/HN/HSG125) but the boundary has been expanded to provide a more logical extension.

In addition to the 275 homes to be accommodated within Proposal HN2, the proposed site could accommodate approximately 480 additional homes (plus supporting community uses to be agreed), split into two development areas north and south of the existing small-holdings, as detailed below.

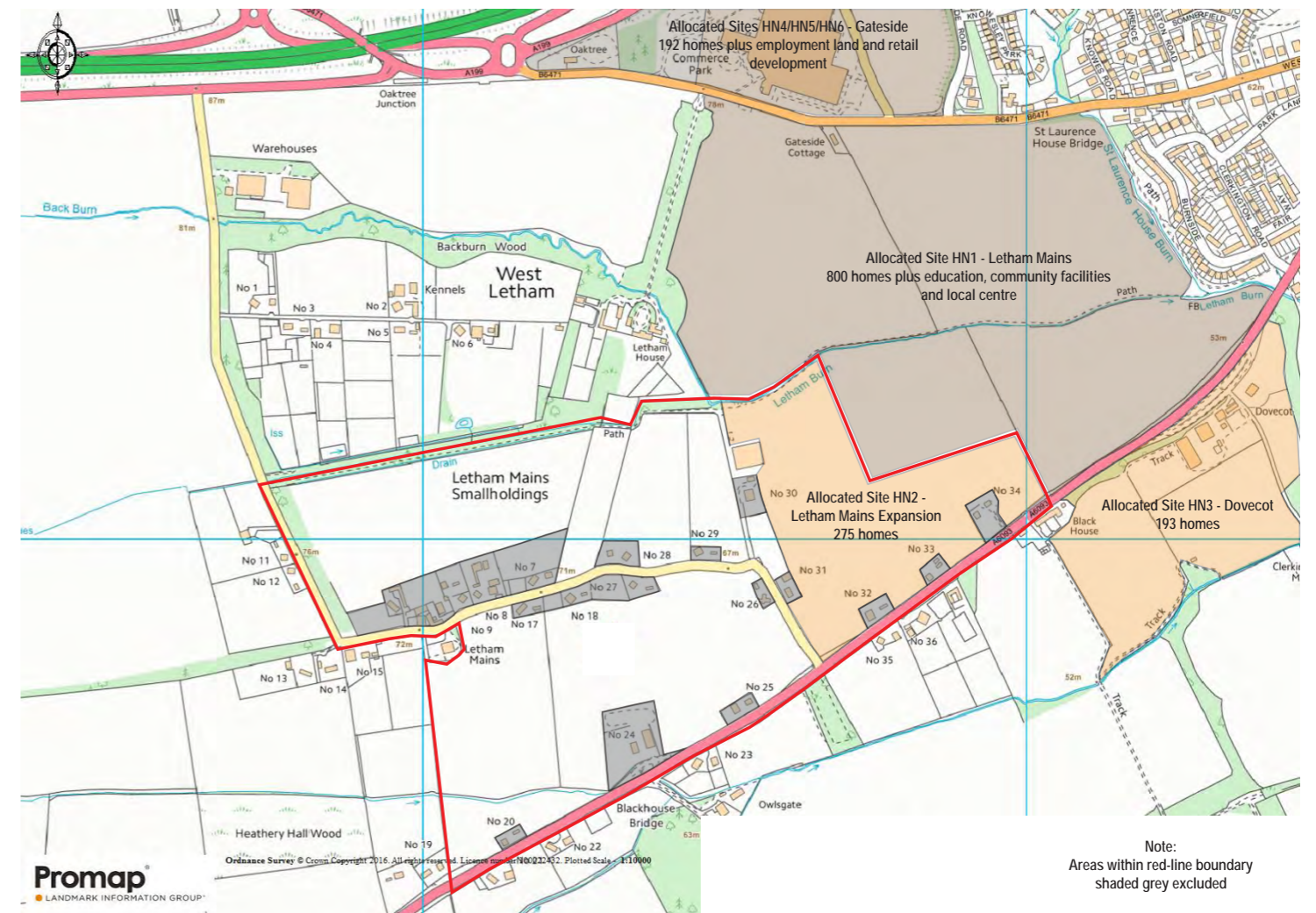


Figure 1 - Site boundary, South Gateside (land north of A6093), Haddington

Aims & Strategy Drivers

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

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

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

The plan's **key aims are broadly supported** in terms of East Lothian's role within the Edinburgh City Region.

East Lothian therefore requires to accommodate its share of the growth requirements as set out in SESplan for South-East Scotland with a primary focus on the East Lothian Strategic Development Area centred upon the main A1/East Coast Rail transport corridor.

It is clear that 'appropriate timescales' in delivering spatial strategy, as noted within Aim No.2, are going to be difficult to meet in terms of pre-2019 strategic housing requirements.

Objectives & Outcomes

- *Promote sustainable development*

This objective is supported. With regard to the proposed site at Haddington, the proposed site is adjacent to an existing bus route with scope for localised footpath improvements to provide a safe walking route to town centre amenities.

- *Help grow the economy, increase housing supply and reduce inequalities*

This objective is supported. The proposed housing site at Haddington will address this objective by virtue of providing additional housing (market and affordable) within a marketable location along with associated job creation and local economic benefits.

- *Protect and enhance the area's high quality environment and its special identity*

This objective is supported. The proposed site at Haddington does not sit within a Special Landscape Area. The proposed Countryside Around Towns designation is contested as detailed hereafter. There is scope for the existing strong landscape framework to accommodate appropriate development whilst retaining special qualities associated with the smallholdings and Lethem woodland. The green landscape corridor proposed for the allocated Letham Mains site can also be extended further west providing additional amenity and biodiversity opportunity.

- *Ensure adequate infrastructure capacity and an appropriate use of resources*

This objective is supported. Education infrastructure is now one of the main hurdles to delivering new housing in line with Government objectives. The proposed site can provide for proportional financial contributions towards the planned new primary school at Letham Mains and planned expansion of Knox Academy.

Proposed LDP

Section 2: Spatial Strategy

Paragraph 2.110 of the Proposed LDP states “Haddington is within the eastern part of the Strategic Development Area, and is the most accessible settlement within the cluster.”

The **Spatial Strategy for the Haddington Cluster** proposes significant westwards growth for the town, including Letham Mains (Proposal HN1 and HN2, the latter forming part of this representation), Gateside (Proposal HN4, HN5 and HN6) and Dovecot (Proposal HN3) as illustrated on **Figure 2**.

Given physical restrictions to growth in other directions (topography, golf course, AI, protected landscapes), the only feasible option for further growth of the settlement in westwards.

In this respect, Paragraphs 2.114 and 2.116 of the LDP are contested in that future expansion of Haddington should be catered for over and above the Dovecot allocation.

The proposed new housing sites are demarcated on Figure 2 as proposals ‘HN9a’ and ‘HN9b’ and continues this westwards expansion of Haddington.

The eastern part of the promoted site (Proposal HN2) was assessed by the Council via a Site Assessment contained within Appendix 5 of the LDP Environmental Report (as was the main Letham Mains allocated site, Proposal HN1).

The assessment notes the likely change to landscape character but scope to integrate development through high quality landscaping including landscaped boundaries of native hedgerow and trees.

This approach could also be reflected in the proposed new housing sites with the existing strong landscape framework to be augmented by additional planting.

The intention would be to retain the character of the existing small-holdings and provide a green buffer between this area and proposed new housing. The site boundaries and access options provide for distinct development zones with the southern site adjoining the A6093 as a Phase 1 (termed Proposal HN9a) and the northern part of the site a lower density Phase 2 (termed Proposal HN9b).

Whilst **full landscape, design and technical assessment would be forthcoming via detailed studies currently being commissioned by the landowners, an Indicative Design Framework** is provided at **Figure 3** for information to provide initial visual communication of how the land could be integrated with adjoining development proposals.

As detailed hereafter, East Lothian have not identified sufficient housing sites. Haddington is one of the principal towns within the East Lothian Strategic Development Area and the proposed site can be delivered on a staged basis with Phase 1 providing a short term opportunity to contribute to housing land requirements.

As such, BS&S Group object to the current Spatial Strategy for the Haddington Cluster and seek inclusion of the proposed housing sites as illustrated on Figure 2 and 3 with associated amendments to Table HOU1 and Inset Map 20 (Haddington) with revisions sought as per the following:

Proposal HN9a & HN9b - Land north of A6093, Haddington. Capacity 480 homes with associated community facilities, landscaping, amenity greenspace and SUDS features.

Additionally, BS&S Group object to the current development brief/phasing of Proposal HN2 with this site to form part of the proposed area capable of short term development, accessed via the A6093.

Spatial Strategy for the Haddington Cluster

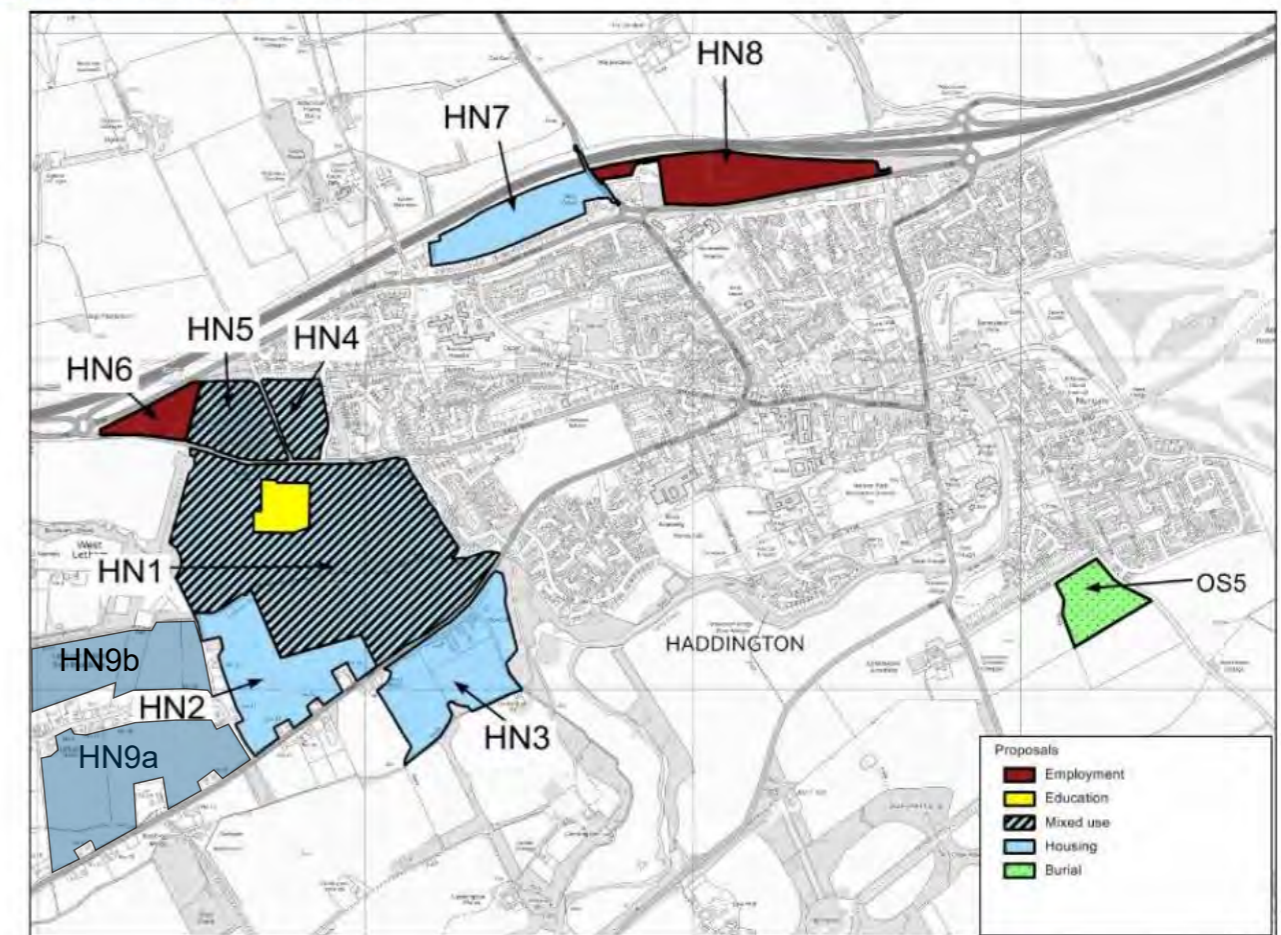


Figure 2 - Proposed LDP Haddington Spatial Strategy with proposed site added as Proposal HN9a & HN9b

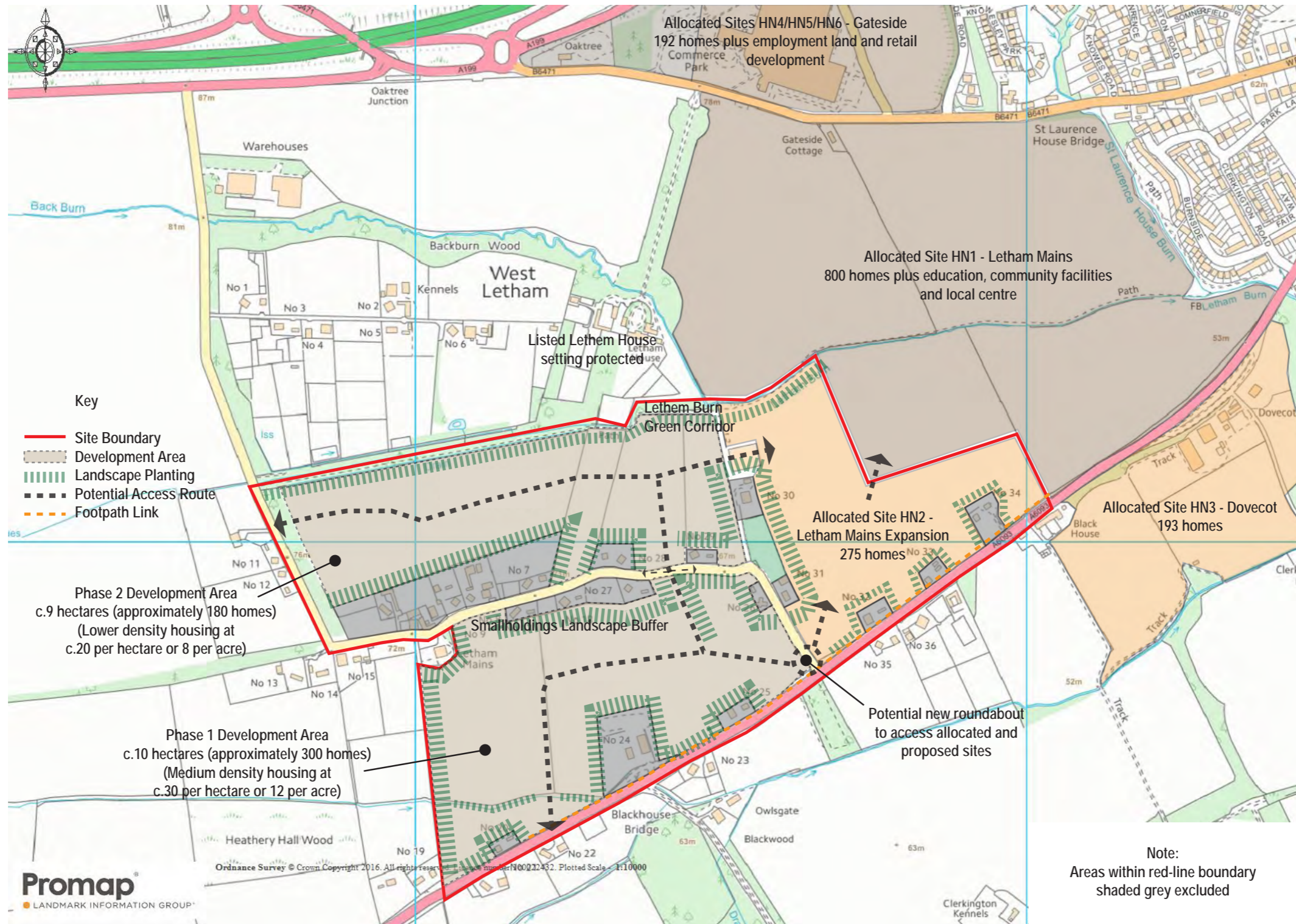


Figure 3 - Indicative Design Framework for South Gateside (land north of A6093), Haddington

Proposed LDP

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

Housing Land Requirement

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

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

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

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

Housing Land Supply

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

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

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

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

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

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

the highest ever recorded for three years (2019-22) as per HTN Table 15

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

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

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

Effective Land Supply Methodology

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

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

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

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

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

The adjusted calculation is illustrated in Table A below.

Table A
5 year Effective Land Supply 2015-2020

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

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

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

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

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

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

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

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

Policy HOU2 sets out the criteria by which potential new sites to meet an effective land supply shortfall should be assessed. Whilst requiring compliance with SESplan Policy 7 criteria (i.e. impact on local character, Green Belt objectives and local infrastructure availability), the policy has additional criteria; location (extension of defined settlement), effectiveness (can be substantially complete

within 5 years), scale (maximum of 300 units), timing (housebuilder interest) and development plan strategy (not prejudicing existing allocations and associated infrastructure requirements).

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

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

For clarity, the proposed Phase I of the site at Haddington could meet the requirements of the proposed Policy HOU2:

1. **Location** - Site is an extension of the principal settlement within the East Lothian Strategic Development Area.
2. **Effectiveness** - Site can be developed on a stand-alone basis and largely completed within a five year period.
3. **Scale** - The proposal would be appropriate in relation to the existing settlement and is 300 units.
4. **Timing** - There is housebuilder interest in the proposed sites and can be delivered in the short term.
5. **Development Plan Strategy** - Infrastructure in terms of transport/access is achievable (subject to formal TA and technical approval) and in terms of education, financial contributions would assist with delivering planned new primary and secondary school capacity in the catchment area.
6. **Infrastructure** - As per Point 5.

Affordable Housing

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

Education Infrastructure Strategy

It is noted that, with reference to new education provision in the Haddington Cluster, Paragraph 3.95 states that significant new capacity is required at primary and secondary level.

Expansion of Knox Academy is planned to accommodate the LDP strategy. A new primary school is planned for Letham Mains to accommodate the allocated housing site and expansion site (Proposals HNI and HN2).

It is noted however that a temporary solution may be achievable, utilising other existing schools, to allow for development at Letham Mains to progress (Paragraph 3.98).

The proposed housing sites can contribute to the financial requirements of delivering the overall education solution for Letham Mains and also utilise the proposed temporary solution in order to allow development on Phase I in the short term.

Proposal ED5 sets out that financial contributions will be sought for both primary and secondary school provision in relation to planned new schools at Haddington in line with the LDP Supplementary Guidance: Developer Contributions Framework.

The overall approach to education for the Haddington Cluster as outlined in Proposal ED5 is therefore supported in principle and the proposed site can assist with deliverability of wider solutions through proportionate financial contributions.

Education Contribution Requirements

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

The proposed site is located with the Haddington Secondary Education Zone and proposed Haddington Primary Zone (but it is expected it would contribute to adjacent Letham Mains zone).

Pages 42 & 43 of the **Supplementary Guidance: Developer Contributions Framework** outlines the specific sums for this zone.

The proposed site would require to make the following financial contributions.

- £5,815 per house towards Secondary capacity
- £8,400 per house towards Letham Mains Primary

- Total of £14,215 per house

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

In this regard, costings for new infrastructure in terms of a clear calculation of how this cost is spread across proposed contribution sites/areas should be set out in more detail (it is noted from the LDP Action Programme that the developer proportion of the new secondary school for this cluster is £1.657m from a total cost of £6.59m whilst the contribution for the Letham Mains expansion site (Proposal HN2) to the new primary school is £2.31m).

It is noted in Paragraph 1.21 of the Supplementary

Guidance that windfall sites will not be supported where they impact negatively upon LDP sites and associated infrastructure requirements. However, the proposed site could assist with the overall strategy by releasing early funds towards provision of new schools where final school capacities are yet to be determined.

Community Facilities (Proposal CF1)

It is noted that there is a requirement for sports pitches across some, but not all, of the contribution zones to meet additional demand arising from the proposed development strategy. The proposed site is located within the Haddington Sports Facilities Contribution Zones (LDP Page 199) and the Supplementary Guidance sets out a contribution of £336 per house towards sports pitches and changing accommodation for the Letham Mains expansion site.

Health and Social Care Facilities (Proposal HSC2)

It is noted that a new East Lothian Community Hospital and Campus at the site of Roodlands Hospital in Haddington is scheduled to open in 2020 and will provide an Integrated Care Facility which will re-provide and repatriate health care services. No contribution sum is attributed towards this facility.

Open Space and Play Provision (Policy OS3&OS4)

The proposed site can adhere to requirements, which would be the subject of detailed design considerations, in terms of minimum open space requirements for new housing, off-site enhancements and play provision requirements.

Location

Policy T1 requires new development to be well located and accessible in relation to public transport and walking/cycling routes. The proposed site is on an existing bus route and localised footpath improvements can assist with connection to local services and amenities. A Transport Assessment is being commissioned by the BS&S Group.

Infrastructure Fund

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

Whilst not covered by site specific requirements, the proposed site is located immediately adjacent to the following contribution zones (**Supplementary Guidance: Developer Contributions Framework** sets out contributions) albeit it is noted that windfall sites will be assessed on a case by case basis:-

- Segregated Active Travel Contribution Zone: £454 per unit
- Rail Network Contribution Zone: No cost
- Old Craighall A1/A720 Junction Contribution Zone: £17 per unit
- Salter's Road Interchange A1 Contribution Zone: £35 per unit
- Bankton Interchange A1 Contribution Zone: £23 per unit
- Musselburgh Contribution Zone: £7 per unit
- Tranent Contribution Zone: £12 per unit

- Total approx. £550 per unit

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

Proposed LDP

Section 5: Diverse Countryside & Coastal Areas - Green Belt

Countryside Around Towns Designation

Paragraphs 5.20 to 5.22 and Policy DC8 set out the Council's proposed Countryside Around Towns policy. This designation currently covers the unallocated parts of the site considered by this representation.

It is acknowledged that the aim of this policy is to conserve the landscape setting of identified settlements within East Lothian. It is also noted that these areas can also provide opportunities to extend the wider green network and related recreational accessibility.

The policy puts in place similar restrictions as a Green Belt designation and has the effect of shaping settlement growth.

In this regard, for Haddington, the Council intend to implement this designation on areas to the west, south-west and east of the town. When added to existing protective designations to the south and the strong boundary of the AI (and rising land) to the north, this has the effect of placing a development moratorium upon Haddington (with exception of one limited area west of Dovecot).

In particular, the LDP Technical Note 8 - Countryside Around Towns, sets out the specific reasoning for certain areas including the land west of Letham Mains, Haddington.

This assessment notes the distinctive landscape character of the long established smallholdings and states that infill development would result in the loss of this distinctive pattern and be visually detrimental to the western entrance to Haddington along the A6093. Reference is also made to the distinctive tree belts in the vicinity of Letham House and connecting areas.

However, this assessment does not take into

account a more sensitive approach to development which is possible at this location. The proposals outlined in principle within this representation would allow for this approach to be taken forward. **Figure 3** on Page 6 above illustrates the basis for this approach.

Firstly, in terms of the current character, there is ambiguity over where Haddington begins and the countryside ends. Existing built form is varied with some degree of traditional smallholdings comprising single houses, sheds and small fields but other areas representing more sporadic individual houses without much associated land, i.e. not all of the built form is of a 'smallholding' character.

The opportunity exists to create a stronger transition between urban and rural with development of appropriate varying density enabling integration of the existing smallholdings with new development. The density in the northern part of the site, adjoining the main area of smallholdings and Letham House policies, could be lower to reflect existing plot ratios. A graduation of lower to higher density could be created from north to south where the site adjoins the A6093.

The character of the key central area of smallholdings can be maintained with the minor road utilised only for accessing these properties and creation of a landscape buffer allowing for transition between existing and new development.

The landscape corridor planned within the allocated Letham Mains housing site can be extended westwards along the Letham Burn, thereby providing extended access and amenity. This green corridor would also create a buffer to the Listed Letham House and grounds.

Specific types of planting can have a short term impact with poplar trees and mixed-species hedgerow planting capable of creating an appropriate landscape edge on site boundaries, particularly the south-western approach, and as a buffer to existing smallholdings.

Access arrangements through the site can also assist with the integration of existing character rather than imposing a standardised suburban style. The road proposals would provide for an off-set roundabout at the junction of the A6093 and minor smallholdings road. This would facilitate direct access into the allocated and southern areas of the site, whilst also then creating an opportunity to take a link northwards to the northern part of the site and a link to east and west sections of the existing minor road.

The positioning and landscaping of this northwards road and linkage to the existing access would be crucial in allowing for the character of the smallholdings area to be retained.

The proposals will be developed through full urban design, landscape and technical assessment to demonstrate how such an approach could be implemented.

Notwithstanding the potential for a landscape design approach to the development of this area, the fundamental objection to the proposed policy designation is that it is overly restrictive in terms of Haddington's future growth.

It is likely that the town will require to expand further in future (as not all new development will be capable of being provided within Blindwells or other new settlements). The policy would place an artificial halt to settlement growth and will inevitably require to be reviewed in due course.

This representation therefore objects to the proposed Countryside Around Towns policy designation west of Haddington.

Proposed LDP Environmental Report Appendix 5

Site Assessment: Comparison of Proposed Site with Letham Mains

The Council has provided a Site Assessment for each of the sites promoted for development within the Proposed LDP Environmental Report.

The allocated part of the proposed site (Proposal HN2) is included as site ref.PM/HNHSG044 Site B within Appendix 8 of the Environmental Report (Pages 33-37).

The following provides an analysis of this assessment to illustrate how the allocation could be extended westwards to integrate the proposal area.

Each comment accords with the colour coding utilised by the Council, i.e. green (positive), amber (any constraints can be overcome), red (significant constraint).

Location

- The allocated site is noted as being well related to the proposed Letham Mains development area but is rated 'red'. The extension of the allocated site would clearly also be well related to this growth area.

Accessibility

- The assessment notes that the allocated site would be within suitable walking distance threshold of new public transport links and amenities within the Letham Mains development area but is 2km from the town centre. It should be noted that there is an existing bus service on the adjacent A6093 Pencaitland Road where service frequency could be upgraded. Additionally, new footpath linkage and the development of the adjoining area will improve walkability into the town centre.

Exposure

- The assessment notes that existing protection from northerly winds is limited but planned

development would improve this situation. The proposed site benefits from mature tree belts which can provide protection.

Aspect

- The allocated site's south-eastern aspect is noted and the new area generally forms a continuation of this aspect.

Suitability for Proposed Use

- The assessment of the allocated site notes that development of the site for housing would not result in conflicts with surrounding land uses which include agricultural fields and smallholdings plus allocated housing. This would be similar for the extended site area.

Fit with local/strategic policy objectives

- The assessment notes the site is adjacent to a main settlement within the SDA and would align with strategic policy objectives.

Physical Infrastructure Capacity

- The assessment notes a requirement for upgrading of the local sewage system. The extended site could increase this benefit to the adjoining smallholdings area. Access to Phase I of the new housing area could be facilitated from the A6093.

Service Infrastructure Capacity

- The assessment notes the potential extension of capacity for primary and secondary schools. The extended site could provide additional financial contributions towards this solution.

Deliverability/Effectiveness

- The assessment notes that the allocated site would be dependent on programming of the adjacent Letham Mains site. However, with the extended proposals, there is scope for this area (Letham Mains extension and area to west) to be initiated on similar timescales to Letham

Mains. There is scope for access from the A6093 and linkage to be provided to Letham Mains as both areas develop. This would increase housing delivery and maximise infrastructure investment.

Biodiversity, flora & fauna

- The site is not within any areas designated for their international, national or local nature conservation interest. The assessment notes that the allocated site provides the opportunity to enhance the Central Scotland Green Network through enhanced habitat and a recreational route along the Letham Burn. The extended site could increase this proposal westwards.

Population

- The assessment notes the positive contribution of housing (including affordable housing) and has reasonable access by public and active travel to facilities. This would be reflected in the extended site.

Human Health

- The assessment notes that the site has no known contamination and reasonable access to open space and the core path network. The extended site would reflect this.

Soil

- The development of the site would result in some loss of Class 2 prime agricultural land but there are no rare or carbon rich soils on this site. It is noted that the majority of the LDP allocated sites result in loss of prime agricultural land.

Water

- The assessment notes that a Flood Risk Assessment is required and the allocated site would require to provide a buffer zone to the Letham Burn whilst existing properties should be connected to the public sewage system. The extended site would allow for wider

improvements to be implemented.

Air

- Development on the site would not be affected by existing sources of air pollution and the site would have good active travel and public transport accessibility. As noted, there is scope for service improvement on the A6093 where greater demand will provide greater commercial viability.

Climatic Factors

- The assessment notes the risk of car-based journeys to increase emissions but this is countered by potential improvements to public transport.

Material Assets

- The site has been assessed negatively as greenfield land but this is the case in the majority of the allocated LDP sites.

Cultural Heritage

- The B-Listed Letham House is noted to the north-west of the allocated area. This would still be screened by woodland with the extended site area.

Landscape

- The assessment notes the requirement for high quality, native species landscape boundaries to be created to integrate development. The extended area provides the opportunity for increased use of the established landscape framework.

Overall

- The extension of the allocated area, westwards, would not create any greater negative impact and indeed can positively improve wider green network, public sewage and amenity connectivity.**

Conclusions - A Deliverable Site

Site Effectiveness Summary

Scottish Planning Policy and guidance set out in PAN 2/2010 Affordable Housing and Housing Land Audits require that sites allocated within Local Development Plans are effective, being able to contribute completions during the plan period (up to year 10 from LDP adoption).

As such, PAN2/2010 criteria for assessing site effectiveness provide a test against which sites require to be gauged with the **land at Haddington considered effective, being free of potential site constraints and able to deliver units within the plan period.** Specifically:-

Ownership

The site is owned by a willing seller.

Status: **Effective**

Physical

The site is not known to be restricted by any physical factors which would preclude development. Site access can be taken from the A6093 Pencaitland Road with scope for a new roundabout to serve the allocated Letham Mains extension, the westwards expansion and existing smallholdings.

Status: **Effective**

Contamination

The site, given its greenfield arable nature, has been deemed to have a low risk of contamination.

Status: **Effective**

Deficit Funding

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

Status: **Effective**

Marketability

The Edinburgh housing market remains a highly marketable location with demand for both private and affordable units confirmed via the SESplan Housing Needs and Demand Assessment. The proposed site could be programmed for completion within the LDP period (including a contribution to the pre-2019 SESplan period). Based on the estimated capacity of 300 units in Phase 1 and 180 units in Phase 2 and an estimated site start in late 2017/early 2018 (planning approval in mid/late 2017), the site could provide a significant contribution to pre-2019 housing requirements and be largely developed within a five year timescale.

Status: **Effective**

Infrastructure

The proposal can improve service utility connections (sewage) for the local area.

Status: **Effective**

Land Use

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

Status: **Effective**

Overall

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

Proposal of Application Notice

In order to demonstrate deliverability, the BS&S Group have submitted a Proposal of Application Notice and Environmental Impact Assessment Screening Request to East Lothian Council for the extended development area.

The intention is for pre-application meetings with the Council (and EIA screening) to determine the exact requirement for supporting studies with work commissioned thereafter.

Preparation of key studies will be conducted in early 2017 which will allow for an application pack to be ready by Spring 2017.

The BS&S Group wish to work with the Council in terms of the Local Development Process and are investing in the above work to demonstrate deliverability as part of a twin-track approach.

Summary

The BS&S Group wish to introduce this extended site to the Council in order for a fully considered planned growth of Haddington West to contribute to housing land requirements.

As such, BS&S Group object to the current Haddington Cluster Spatial Strategy and seek inclusion of the proposed housing sites (termed Proposal HN9a and HN9b on Figure 2 above) with capacities of approximately 300 units and 180 units respectively, with associated amendments to the Haddington inset map, Table HOU1 and Action Programme.

Additionally, BS&S Group object to the current development brief (and associated phasing) of allocated Proposal HN2 with this site capable of short term development, accessed off the A6093, in conjunction with the extended proposed area.

Further, BS&S Group object to the proposed Countryside Around Towns designation west of Haddington for the reasons outlined above, including the overly restrictive constraint to future settlement growth.

This representation outlines an approach which can retain the special qualities of the Letham smallholdings and woodland framework and a full design proposal will be developed over the coming months to support detailed discussions with the Council in 2017.

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Submitted via email to ldp@eastlothian.gov.uk

Our Ref: KMcG/2016/10/0116

Date: 03/11/2016

Dear Sir/Madam

Proposed East Lothian Local Development Plan – Proposed Cemetery at Haddington Cluster

We refer to the current consultation being undertaken by East Lothian Council for the Proposed East Lothian Local Development Plan and write on behalf of our client Mrs Taylor. This representation specifically relates to the allocation of land at Briery Bank, Haddington for a new cemetery (Proposal OS5).

The proposed allocation of this land for use as a cemetery has been well publicised in the local press and it is our understanding that the residential properties at Briery Bank have received written notification of this proposal. It is extremely disappointing that the Council has not approached or engaged with Mrs Taylor.

Our client opposes the allocation of her land for use as a cemetery. This letter of representation demonstrates that the site is not deliverable and there is no current requirement for a cemetery in Haddington. This letter also details our client's opposition to the process undertaken by the Council in identifying this land in the Proposed Plan for cemetery use.

Process undertaken by East Lothian Council

The Main Issues Report for the emerging Local Development Plan was published for consultation in November 2014. There is no mention of the requirement for a cemetery in Haddington in the Main Issues Report. This site is also not included in the Haddington Site Assessment contained within the accompanying Environmental Report of the Main Issues Report.

The requirement and specific location of a new cemetery for Haddington is a key issue for this area and should have been consulted on at the Main Issues Report stage.

The Council does not appear to have considered any alternative locations for the proposed cemetery. Again, the Main Issues Report should have included details of a preferred location for the cemetery and alternative options. This would have given the landowner as well as the wider community an opportunity to provide their opinion on the requirement and location of a cemetery.

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Instead, this has been introduced at Proposed Plan stage with no consultation with the landowner or public.

Paragraph 65 of Planning Circular 6/2013: Development Planning states that:

“Main Issues Reports are key documents in terms of front-loading effective engagement on the plan, and aligning development planning with Strategic Environmental Assessment”.

In this instance East Lothian Council has not undertaken effective engagement to seek public opinion on the location of a cemetery in Haddington.

Paragraph 67 of the Circular continues that:

“However, it still needs to be site specific and should set out the authority’s proposals for development, in particular where these development should and should not occur. The MIR should identify the planning authority’s preferred options but it also needs to consider reasonable alternatives, where these are available...The principles of setting out the preferred option and any reasonable alternatives also apply to policy matters, where a policy issue is a main issue.”

This approach has not been followed in the preparation of the Main Issues Report for the East Lothian Local Development Plan. The MIR is silent on the matter of a proposed cemetery in Haddington and does not outline the Council’s preferred option or consideration of any alternative sites or solutions.

Paragraph 66 of the Circular details that the LDP should be fully co-ordinated with other key strategies from the earliest stage.

The Draft Burial Ground Strategy was presented to East Lothian Council’s Cabinet in 2013. Therefore the Council’s potential requirement for land for a cemetery in Haddington was known in advance of the publication of the Main Issues Report for consultation.

Paragraph 77 of the Circular relates to the preparation of the Proposed Plan and states that:

“Planning authorities should be able to demonstrate the underlying reasons for their preferred development locations and policies. This stage should not be used to ‘test the water’: new or controversial elements of plan content should already have been aired at the Main Issues Report stage (at least as reasonable alternatives). If particular issue or site arises that was not consulted on in the MIR, the planning authority may need to carry out further consultation on the particular issue before publishing its Proposed Plan, if it wants to include it in the plan. Planning authorities should be prepared to justify their position at any subsequent Examination of the plan.”

The proposal for a cemetery at Haddington appears to have been introduced at the Proposed Plan stage with no consideration of alternatives. As far as our client is aware, the Council did not undertake any consultation on this particular issue prior to the Proposed Plan publication.

Suitability of Site for Burial Ground

Prop OS5: Potential Cemetery Extensions of the Proposed Plan details that land is safeguarded for a new cemetery at Haddington Cluster: Brierybank, Haddington. The Proposed Plan offers little supporting text in relation to this proposal. Paragraph 3.133 of the Proposed Plan states that the Council adopted its Burial Ground Strategy in March 2015 and this prioritises the provision of burial space within each individual town and large village.

Paragraph 5.2 of the Burial Ground Strategy outlines the model to be adopted by the Council in determining priorities for a development site. This model is as follows:

“a) A proposed cemetery location must be free from restriction to develop as a result of SEPA, Historic Scotland or Local Plan determination or the costs associated with complying with such restrictions must fall within the financial model described in b). No dispensations are available from Planning or SEPA with regard to development and provision of burial grounds so, all proposed sites must comply with the associated regulations and guidelines operated by those authorities.

b) The overall cost of a proposed facility, inclusive of any archaeological investigation, ground survey, acquisition, construction, servicing and fees must equate to no more than £630 per created lair as at 2014. This figure is based on the average sale of a Right of Burial according the Council Charges Book at 2014 with the long-term maintenance site covered as part of the interment fee and headstone management fee.

c) A site will only be considered suitable for development if it is capable of serving either the immediate geographic community, ward or cluster for a minimum of 50 years.

d) To be considered for development, new sites must pass the criteria contained within the Land Acquisition Check List: Appendix 1

e) New build housing developments will be required to demonstrate how burial provision needs can be met within their respective master plans for the defined 50 year period. In all cases the required provision will allow for 38% of the additional households at a rate of 4.5 burial spaces per household.

f) Each discrete housing development will be considered in relation to availability of land already secured by the Council and if such facility exists or can be provided, developers will require to contribute a capital sum equal to the investment required to provide serviced lair space on an existing site to the volume required to meet the projected burial space needs of that development. In cases where no opportunity exists to extend an existing facility or, the scale of the extension would have an adverse effect on the integrity of the facility, the developer will be required to allocate land and set aside funding to develop this land within the housing development footprint.

g) The Council will also explore opportunities to develop, either directly or with partnership arrangements, green burial options that can contribute to the aims of protecting and enhancing the natural environment and allow for appropriate recreational use of such land.”

Taking each of the above criteria in turn:

- a) The site currently comprises of greenfield agricultural land. The site is free from restrictions to development. The criteria that makes this land suitable for the development of a burial ground, also makes it suitable for alternative development such as housing.
- b) The Council cannot know the overall costs for this site as no approach has been made to the landowner in terms of acquiring their land for a cemetery. This land is not being actively marketed for disposal.
- c) The scale of site at the edge of settlement does mean that it has capacity for a minimum of 50 years. However, the Council's own Burial Strategy states that there is no requirement in Haddington for some 25 years. The edge of settlement location and proximity to the immediate geographic community of Haddington also makes this site suitable for alternative development.
- d) The Land Acquisition Check List: Appendix 1 does not appear to be available online and was not attached to the Report presented to Cabinet on the 10th March 2015.
- e) This criteria requires new build housing development to make provisions for burial ground. The responsibility for the provision of additional burial ground should therefore be linked to the housing allocations in Haddington and for the developers of these sites to address. The burden should not fall to our client as landowner of this site who is not gaining any benefit in terms of allocation of their land for housing.
- f) As above, it is for the developers of the housing allocation sites to contribute towards the provision of burial ground.
- g) This relates to the provision of green burial options and is not of relevance to this representation.

Section 5.3 of the Burial Ground Strategy details that based on the current trends towards burial, there is a requirement of 0.9 hectares of land for burial purposes in Haddington over the next 50 years. It is assumed that some of this requirement can be accommodated within the existing cemetery. The identification of 4 hectares of land for cemetery use in the Proposed Plan is therefore well in excess of demand.

Page 10 of the Burial Ground Strategy contains a table outlining the Council's intent and required delivery date in relation to current burial sites. For St Martin's Cemetery in Haddington, the Council has identified that there is no suitable land available and a new out of town site to serve Haddington Cluster will be required. The due date for this requirement is 2041. It is therefore considered premature that a site has been identified in this emerging Local Development Plan some 25 years before it is required and while there is available capacity within the existing cemetery.

The site boundary extends to 4.03ha. It is also considered that the scale of the land allocated for cemetery use is excessive in comparison to the scale of Haddington settlement and demand for burial ground in the next 50 years.

On the 11th June 2013 the Executive Director (Services for Communities) presented a report to Cabinet on the Acquisition of Land for the Provision of New Burial and Allotment Ground.

Paragraph 3.12 of this Report states that:

"Of the remaining sites, in view of the likely low, agricultural value of the land, it is considered prudent to acquire the land at this stage in order to secure it for future cemetery development."

Paragraph 3.13 continues:

“In the case of Briery Bank in Haddington there is high demand for allotment provision in the cluster and development of facilities in this field now, with the option to lease the majority of the field back for agricultural use, would generate income to offset the cost of cemetery provision, with cemetery development following in approximately 25 years.”

This Report confirms that there is no current requirement for a cemetery in Haddington and the Council is looking to purchase this field at this stage, purely as a commercial venture. As there is no current need for a new cemetery in Haddington, our client strongly opposes the allocation of the site for this use in the Proposed Plan.

The Environmental Report that accompanies the Proposed Plan includes a site assessment for this land (reference: MIR/HN/OTH021). It should be noted that this site was not included in the Interim Environmental Report published in 2014 along with the Main Issues Report.

The Environmental Report states that this site was suggested by East Lothian Council Amenity Services.

This Environmental Report assesses the suitability and deliverability of the site. This details that the site is relatively well related to the settlement at Briery Bank. It also notes that the site is in close proximity to a bus stop and within walking distance to Haddington Town Centre. The proximity to the settlement and accessibility also makes this site suitable for an alternative development and expansion of Haddington to the south.

The landscape section of the Environmental Report specifically states that the development of the site would result in the southwards expansion of Haddington into the surrounding open rural landscape. At this stage, the Council is proposing to allocate just the land for the cemetery to the south of Haddington. Our client is fully aware of the plan making process and that this site cannot be introduced as a residential development opportunity at this late stage in the process. The proposal for the allocation of our client's land for a cemetery has only arisen at the Proposed Plan stage. Had this been included in the Main Issues Report and public opinion sought, our client would have submitted representations at this stage and could have promoted the land to be considered for an alternative use.

The deliverability section of this site assessment in the Environmental Report states that *‘the landowner's willingness to sell the land is not known at this stage’*. It is clear from the Cabinet Committee Reports available online, that this Council has been considering the purchase of this site for at least three years. During this time no contact has been made with the landowner in relation to the acquisition of their land. This land is currently not being marketed for sale. As the site is not available, the cemetery proposal is therefore not deliverable.

In summary, this land is not available for acquisition for cemetery use and no approach has been made by East Lothian Council to our client. The process undertaken by the Council in identifying this land for cemetery use in the Proposed Plan is flawed. The correct consultation procedures have not been adhered to, with no alternative options being explored. It is considered that the size of site allocated is excessive in comparison to the scale of Haddington and demand. The identification of a cemetery site in Haddington is premature as the Council's own Burial Grounds Strategy does not identify a requirement for a new cemetery until 2041.

The client requests that the Haddington Cluster Strategy Map and Proposal OS5 are amended to remove reference to the allocation of this site for a cemetery.

We trust that the above will be taken into consideration in the preparation of the East Lothian Local Development Plan.

Should you have any queries or require any further information, please do not hesitate to contact me at the telephone number below.

Yours Faithfully,

Kerri McGuire

Associate

T: 0141 567 5371

E: kerri.mcguire@g-s.co.uk

From:
To: [Local Development Plan](#)
Subject: Objection to LDP
Date: 04 November 2016 20:05:18

I write to formally object to the new Local Development Plan - specifically the plans for Gullane.

My request is that SALTCOATS (NK7) and FENTON GAIT SOUTH (NK9) to be removed from the proposed Local Development Plan as sites for housing development.

I am very concerned about the implications for West Fenton residents and also the rest of the community that use the roads around West Fenton - these include my clients, and Muirfield Riding Therapy who have 14 horses here and offer riding to a huge number of riders with disabilities. It is not just our riders put at risk, but the handlers of the horses when they are moving them around on the yard for farrier/vet/feeding - the tight bends make this a dangerous activity now, so an increased volume of traffic from housing developments will jeopardise safety of horses and handlers. Many other vulnerable users will also be affected - young Scouts use the West Fenton road (c111) to access an area of woodland where they camp and run activities. There are many residents of the eastern end of Gullane who enjoy walking down the West Fenton Road. I note that many of them are elderly. I see the huge health benefits they are gaining from their walks. The Saltcoats Field and Fenton Gait South Developments will increase the traffic through West Fenton to a level that will significantly decrease the safety of all these vulnerable road users.

It is clear the cumulative effect of the 4 development sites in Gullane is not being taken into account. Gullane has poor public transport links which means a dramatic increase in traffic would be inevitable. Plus there is the bigger picture to consider. For example, an expansion of Aberlady will also increase traffic along the West Fenton roads, as the Luffness to Fenton Barns route will be their preferred choice to get to North Berwick, avoiding Gullane's traffic lights and the narrow high street.

There is a perfectly sensible and reasonable plan to develop the site of the old fire training college. This has the support of the local community and it will provide additional housing at a scale that the village has the capacity to cope with - the school, medical centre, and the road infrastructure.

I would be very grateful if you would take these points into consideration and amend the Local Development Plan accordingly.

Yours sincerely
Clare Tulloch

From:
To: [Local Development Plan](#)
Subject: objection
Date: 04 November 2016 21:27:43

I am objecting to the following planning applications.

I am requesting that SALTCOATS (NK7) and FENTON GAIT EAST (NK8) and FENTON GAIT SOUTH (NK9) to be removed from the proposed LDP as sites for housing development.

I have a number of very important reasons why I am objecting which I will list. The fact that 4 sites are being considered in all together is a huge concern and potentially devastating for the village and the community.

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

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

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

The Fire school being a brown field site must surely be considered first for housing before green field sites are built on.

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

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

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

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

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

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

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

Please consider these points.

Gemma Langlands

From:
To: [Local Development Plan](#)
Subject: Objection to NK7, NK8 and NK9
Date: 04 November 2016 21:52:11

I would like to lodge an objection to each of the new developments proposed being included in the LDP (NK7, NK8 and NK8) in Gullane and would like them to be removed from the plan.

The cumulative effect on the village from all 4 proposed sites being developed would be overwhelmingly negative. The existing infrastructure within the village would not be able to cope with the huge increase in residents, commuters, service users and school children. As a small village, Gullane should not be expected to shoulder 50% of the increase in new housing for the North Berwick Coastal area - development of this size, in proportion to the village's current size will change the character of the village and the amenity status of the Gullane Conservation Area forever more.

The rural road network surrounding the village is in no way suitable to the inevitable increase in traffic which would be a result of development on this scale. The C111 in particular, which is currently mainly used by bike-riding families, pony trekkers and walkers would no longer be suitable for this use due to its probable use as a rat run for the Saltcoats development.

The impact on the school and medical practice would be severe and not easily remedied. The current proposal to only increase the size of the school by two additional classrooms is plainly inadequate if looking at potential new numbers of pupils as evidenced by other recent residential developments in the village (32 pupils from 29 houses in Muirfield Grove).

Finally, there is a suitable brownfield site within the LDP (the firestation) which would provide sustainable development. There is no need to expand into the surrounding greenfield sites, and doing so would actually prevent the brownfield site from being developed. Developers are likely to see the brownfield site as being less profitable and the village will be left with an unused eyesore for a number of years.

Regards,

Alasdair Langlands

Musselburgh Area Partnership

RESPONSE TO THE PROPOSED LOCAL DEVELOPMENT PLAN

Because of the publication of the Proposed East Lothian Local Development Plan, a special meeting of the Musselburgh Area Partnership was arranged for Monday 24th October 2016 to allow members to discuss the key issues and make representation of the views of their groups/organisations. Whilst many groups/organisations will make their own submissions in response to this suite of documents, the Musselburgh Area Partnership was invited to respond to the plan.

As a result of this meeting the following key issues/concerns/views were raised and discussed.

It should be noted that from the outset the Musselburgh Area Partnership did not support the Compact Strategy and was in favour of the Dispersal Option, which in our view provided a fairer, less divisive future thinking option.

This view has not changed.

KEY MESSAGES

There are some key messages within the plan which appear to suggest that the west of the county is less than that of the east.

Paragraph 1.15 ***“Settlements further east are also near the limit of what can be achieved in the way of expansion without significantly changing their character, setting and identity”***

This sends out a clear message that the character, setting and identity of the west of the county is not an important issue, which ultimately goes towards creating a divisive county. However, this is incomplete contradiction to the future vision of the recently published SESPlan which clearly states:

“3.13 Sites around existing East Lothian settlements will provide a significant amount of land to meet the requirements of the emerging East Lothian Local Development Plan. Once the development anticipated around Musselburgh is delivered, environmental and infrastructure constraints are expected to limit further significant expansion of settlements in the Musselburgh area. Any further development requirements for East Lothian will be dispersed to locations further east along the Long-Term Growth Corridors. Subject to future growth requirements for East Lothian, there may be a need for a second new settlement in the east of East Lothian”

This also provides evidence that the Compact Strategy proposed by East Lothian Council is a short-term vision to fill the crack until the dispersal along the Long-Term Growth corridors are realised. However, the significant negative impact upon our community is hugely concerning and irreversible.

HEALTH

The overall view is that the current health provision in relation to GP services and the ability to seek an appointment within a reasonable timescale is severely lacking within the Musselburgh Area. Therefore, there is great concern in relation to the adequate GP provision to cater for the increase in population due to the construction of 5700 houses. The massive increase in housing capacity will increase the area by around 50% and the Partnership feels very strongly that there has been insufficient detail, consultation or reference to healthcare within the plan. Given that NHS Lothian is a member of the East Lothian Partnership, we would expect to see a level of engagement mentioned in this plan as the East Lothian Partnership is the governing body ultimately responsible for the East Lothian Plan

There has been no identifiable link in the plan between new developments and GP Services and the impact of the lack of such provision. Given that one of the contributory outcomes for Resilient People is: **“In East Lothian we will live healthier more active and independent lives”** this is viewed as a failure to engage with the relevant agencies and ensure such provision is built in to such developments. The most recent press and media coverage alludes to the fact that 1 in 3 GP surgeries in Lothian cannot take new patients.

Given the large increase in population which will heavily impact on the Musselburgh Area Partnership geographical area this will also impact on the wider health care community in respect of health visitor and primary care capacity.

Regarding health provision the *Proposals PROP HSC2: Health Care Facilities Proposals*, makes a brief mention of various locations throughout East Lothian, including Musselburgh but makes no mention of Whitecraig or Wallyford, where the greatest proportion of housing increase will take place. This lack of acknowledgement in the plan goes little way to ensuring a confidence within these communities of local access to health care, especially as plan clearly indicates that **“3.116 East Lothian Council supports the wider provision of locally accessible health care facilities through the retention of adequate land for health care use”**.

The LDP takes little regard of health issues in the community as a reality. There are many indicators in the plan alluding to health, but the reality is that from a Musselburgh perspective the increase in housing at c.5700 will do nothing to improve the health of the community, the massive increase in housing and subsequent population without full supporting facilities can only be detrimental to the community. The erosion of green space and the green belt continually add to the key issue that everyone deserves to live in a healthy environment which is clearly associated with positive health benefits.

TRANSPORT

The proposed plan does not consider external factors which are and will have an impact in the future. The new housing at Newcraighall is situated a short distance from the key retail triangle which currently services Musselburgh (Tesco, Aldi, Iceland, Lidl). Whilst this new housing is situated within the jurisdiction of the City of Edinburgh Council, it has a potential significant impact on Musselburgh given that this is the closest cluster of food retail outlets for general grocery shopping. This impact has not even been identified in the plan and there is no doubt that there will be an increase in traffic to and from this retail cluster which will add further strain on an already heavily congested area.

There was significant disagreement with the plans view that Wallyford and Whitecraig are well served with public transport. Whilst Wallyford has a more regular bus service than Whitecraig it is on service which will not cope with the potential needs of such the scale of future development which will impact on Wallyford by the greatest increase.

The scale of development within the plan is in complete conflict with the priorities of the Musselburgh Area Partnership. The 3 priorities supporting Strategic Objective 1, Sustainable Economy are:

- 1. Increasing investment in local infrastructure and facilities in a way that meets the needs of locals, enhances the area's unique features and brings more people to the area.*
- 2. Reducing traffic congestion in Musselburgh to ensure it is easily accessed by locals and visitors alike and overall a more pleasant and enjoyable place to live, work, and be.*
- 3. The distinct needs and identities of villages and localities within the wards is recognised and their environments are enhanced.*

The reduction of traffic congestion in Musselburgh will not be achieved with the increase of housing on such a scale in a compact format where there is no viable option or proposal to manage the increase in traffic with a positive impact on Musselburgh Town Centre.

There are areas of transport proposals outlined in the plan that do not provide any real solution that will install the confidence to the public that they will be delivered on. There need to be some realistic proposal to provide this confidence.

Much reference is made regarding the easy access to Edinburgh from East Lothian. This is visionary and not reality as the current journeys to and from Edinburgh in peak hours are less than acceptable and add considerable time to the working day of many people. The easy access is grossly overstated and with no alternative infrastructure options, can only become more difficult.

The current provision of trains at both Musselburgh and Wallyford is a key issue. The current position is that right now trains are arriving at both stations with little or no capacity to take more passengers. The plan mentions the improvement by increasing platform length. However, there is concern that this will only resolve the current situation without being able to cope with the future capacity that such a housing increase will realise.

Whilst Musselburgh is served by a regular bus service, this is becoming more and more hindered by queuing traffic as Musselburgh High Street gets busier. This, under the proposed plan, is set to continue, with identifiable option to mitigate such congestion.

There is a distinct lack of detail in the Plan surrounding certain aspects and locations of proposed future development when it comes to transport. Much is mentioned using the term "required" but there is little detail in the "plan" on how these issues will be specifically addressed.

There has been a lack of completion of agreed cycle paths by developers. Previously agreed improvements by developer have been viewed as lacking in priority and completion. For example; the agreed cycle lane improvement in Pinkie Road has not met the previously agreed timescales which is extremely disappointing given that the new extension at Pinkie St Peter's Primary School is now

open and that “Active Travel” is a priority of the partnership. Adding to that is the fact that such cycle paths are instrumental to the safety of our young people as they are encouraged to lead healthier and active lives.

HOUSING

The proposal for 5700 houses will increase the population of our community by approximately 50%. This massive increase in housing development is proposed with no equivalent increase in infrastructure to cope with the already congested community. Whilst it is accepted that there is a requirement for our community to take its fair share. This is not the case in any respect. Indeed, our community is being viewed as a short term easy option to meet Scottish Government numbers. It does not consider, the community, their health, their needs, their identity.

This plan must be reconsidered and a realistic reduction of housing numbers made to ensure that the impact on our community is fair and equates to the impact of other communities across East Lothian.

Paragraph 2.4 of the NPF3 clearly states that **“All of our people are entitled to a good quality living environment”** This cannot be fairly said about Musselburgh given the proposed planned increase in housing development. A good quality living environment for all is where there is an equity of shared development spread to ensure a similar level of environment for all. The LDP does not deliver on this for all residents in East Lothian, Only some!

There has been no consideration to generational downsizing in the plan which caters for our senior members of the community or indeed those who wish to downsize as their family move on. Specifically, where senior community member wish to downsize but retain a smaller house with an outside garden, there are very few options available. The provision of housing to meet population demand is one thing, but there is a lack of provision of 1/2 bedroom bungalows with small gardens like those in Edenhall Road. This lack of availability does not allow easy downsizing which in turn frees up larger houses. There is also a lack of vision by the developers who to date have commenced construction in the fact that no consideration has been given to the design of easy access to newly build flats by means of a lift. With a faster growing ageing population, these are important key issues which allow more freedom of choice to infirm people or those with disabilities who would benefit from such facilities.

The SES Proposed Plan states:

“Areas important for maintaining the character, landscape setting and distinctive identity of existing and proposed settlements should be protected and enhanced, particularly where they are needed to avoid the coalescence of settlements. The contribution of the natural and historic environment to making distinctive places should be maximised. Key views of the surrounding landscape should be integrated into developments to provide a sense of place and identity.”

It also states that there may be a requirement for a further new settlement in the future over and above Blindwells. This clearly indicates that there is a need for new communities to be developed, not urban sprawl where identity is lost by communities being overloaded and congested in a flawed vision.

Such a massive increase in development will only have a negative impact having taken the easy option of the Compact Strategy. The proposed housing number for the community is the largest single factor which will have the largest negative impact on our community.

ENVIRONMENT

The use and erosion of prime agricultural land in East Lothian cannot be reversed once it has been developed on. We are concerned that this will continue until such times as there is little left to be considered viable for future sustainable environmental use.

Members were concerned regarding the potential flooding risks to some sites and the future cost and mitigation options, of which there is little specific detail.

There is a lack of assurance for the provision green space within future developments which is crucial in maintaining a healthy lifestyle for all.

The identified site show a lack of vision and merely large scale developments to meet housing needs without any real thought to the future consequences of a compact strategy.

Pollution levels/air quality concerns. The East Lothian By Numbers (statistical report 2015) highlights the concerns of the air quality assessment work which is reviewed and updated annually has confirmed that the air quality standards continue to be met for the seven pollutants across East Lothian.

However, since 2011/12 there has been concern about levels of Nitrogen dioxide exceeding the air quality standard (as predicted by computer modelling) in parts of Musselburgh town centre. Additional monitoring has taken place in 2012/13 in the main traffic route through the town, and that has confirmed that in some parts of Musselburgh High Street the levels of Nitrogen Dioxide (NO₂) is close to, or exceeds, the air quality standard (annual mean exceedance of 40µg.m⁻³ NO₂).

There is no doubt that Musselburgh will realise a significant increase in traffic flow, irrespective of how much benefit any active travel plan will provide. This is due to the nature of family life and the need to utilise a vehicle to carry out retail and food shopping for families. Therefore, it is viewed that there is a lack of planning for parking given the increase of traffic in town centre especially.

There is little mention about waterfront development within our community and its potential for the current community and its future increase. This is an important feature and asset to our town which is given little regard.

There is no provision in the plan for self-build sites, which would provide opportunities for those who wish to self-build within their local community which is crucial in maintaining local ownership, identity and opportunity.

There is a strong feeling that there has been a lack of vision and inspiration given in relation the design of new developments to provide a feeling of community, ownership, uniqueness and identity. The current new builds are all of box shaped non-descript design with no real uniqueness of concept.

This in turn leads to large developments of “Lego” style houses with little character, attractive qualities or identity. However, the plan states at 1.16

“The diversity of settlements in East Lothian developed in harmony with their surroundings and in response to the area’s economic activities and connections to areas around it. This is reflected in the layout of the settlements, their architectural styles and in the indigenous materials used for building. These characteristics and built and natural heritage assets are all integral to East Lothian’s sense of place, distinctiveness and identity.”

There appears to no developer consideration to the architectural styles to realise a sense of identity and will no doubt focus on delivery of profit than delivery of local identity.

There has been no thought or provision been given to the concept of urban crofts, which essentially offer numerous community benefits. Specifically, locally grown fresh food but also provides benefits relating to health, environment and allows community interaction in a communal space.

EDUCATION

The Musselburgh Area Partnership views that the LDP has acknowledged capacity issues. However, there is a lack of/insufficient detail on the proposals for transport to/from school.

Whilst we acknowledge the recent consultation on secondary provision, there has been no notifiable outcome of this other than presumption. Given that both primary and secondary provision have been mentioned in the proposed plan, there is a concern that the plan alluded to issues that have either not been addressed or decided or there is a distinct lack of detail being provided to the public.

The Proposed Whitecraig zone – school catchment area includes 100 houses (Old Craighall) that cannot get to the school other than by car or bus. This illustrates that the plan does not take notice of community impact and a sense of identity. More importantly, it does not cater for the safe travelling requirements of children in P6/7 who under normal circumstances, may wish to walk to and from school in preparation for secondary education. This requires a full re-think for the health and safety of pupils and parents in Old Craighall

There is great disappointment at the lack of mention with regards to pre-school/nursery provision. The word nursery is not mentioned once in this plan.

RETAIL/COMMUNITY INFRASTRUCTURE

The population of Musselburgh, Wallyford and Whitecraig is set to increase by around 50%, but there is no identifiable plan to increase the required facilities to meet the demands and requirements of such a large increase. Health, sporting facilities, general food retail, community focused facilities are all facilities which are required to ensure a vibrant community with an equal sharing of community resources.

There is a complete failure to examine and acknowledge the impact of local developments which are not within the jurisdiction of East Lothian. The current housing developments at Newcraighall lie within the jurisdiction of the City of Edinburgh Council, however there is a direct impact on Musselburgh. The nearest food retail outlets are the Lidl, Aldi, Iceland and Tesco cluster which offers a reasonable

range of products within a varied price range. Whilst the Asda superstore is within a reasonable distance from these developments there is no doubt that Musselburgh will serve as an alternative and will attract further traffic to the west side of the town, causing further congestion issues to which there are at present no identifiable solutions.

The regeneration of our town centres is an important part of the LDP, however such regeneration will not be realised if all the measures required to manage such a large increase in housing are realised.

This proposed plan does not compliment the regeneration of our town centre, in fact it does little to assist this, primarily due to the lack of detailed proposals.

There is no specific reference to planning for regeneration of village main streets for Wallyford and Whitecraig. Given the increase in population, there must be a requirement to ensure that retail provision is part of the plan to ensure that there are affordable options in local areas without incurring transport to large outlying retail centres or indeed creating greater impact on the congestion in Musselburgh.

CONCLUSION

The Musselburgh Town Centre Strategy states:

“The VISION for Musselburgh Town Centre In 2018: Musselburgh town centre will be a clean and pleasant environment that attracts people to the town for shopping, business and leisure. Musselburgh’s central streets will be attractive and well maintained and people will enjoy using the town’s public spaces. The town’s extensive history and heritage will be able to be better understood by its visitors and Musselburgh will be marketed as a destination with easy to find parking, a good range of cafes, pubs and restaurants, places to visit and be a pleasant place to visit and in which to spend time.”

This vision will obviously not be realised by 2018 if the scale of development in and around Musselburgh goes ahead. There will be years of disruption through mass development that will only undermine this vision.

The Musselburgh Area Partnership is fully understanding of the housing requirement for East Lothian and the development of our county. However, this must be achieved with equality for all, fairness for everyone and a plan that exceeds that currently proposed.

We feel that our local communities are taking a far greater share of development to realise a short term stop gap vision until large scale infrastructure investment can be made through the county. This appears to be supported by the SES Plan which clearly states:

“3.13 Sites around existing East Lothian settlements will provide a significant amount of land to meet the requirements of the emerging East Lothian Local Development Plan. Once the development anticipated around Musselburgh is delivered, environmental and infrastructure constraints are expected to limit further significant expansion of settlements in the Musselburgh area. Any further development requirements for East Lothian will be dispersed to locations further east along the Long-Term Growth Corridors. Subject to future growth requirements for East Lothian, there may be a need for a second new settlement in the east of East Lothian”

Musselburgh, Whitecraig and Wallyford are taking more than their fair share of development for East Lothian, which will impact heavily on the quality of life of its residents through the various factors and concerns in this response.

The number of housing units planned for Musselburgh far exceeds the capability of the current infrastructure which has limited opportunity of improvement. Therefore, these numbers should be reviewed and a reduction made to ensure that there is a balanced equation between housing and transport infrastructure.

We, as an Area Partnership wish to see a sensible long-term vision which caters for all and ensures the maintaining of our local identities, cultural assets and healthy lifestyle options.

This plan does not deliver on this in our view and indeed does not in any way reduce inequalities across the whole county of East Lothian, in fact it hinders this aim.

The definition of “**Plan**” in the Oxford Dictionary is: *“A detailed proposal for doing or achieving something”*. The definition of “**Potential**” on the Oxford Dictionary is: *“Having or showing the capacity to develop something in the future”*.

Whilst this plan can be considered by some to be a document with an abundance of details, the word “potential” appears 156 times within the plan. This highlights a lack of detailed vision, structure and positive community outcomes and more of a plan with lots of possible potentials with no clear outcomes.

Musselburgh Area Partnership

From:
To: [Local Development Plan](#)
Subject: Objection to planning application SALTCOATS (NK7) and FENTON GAIT EAST (NK8) and FENTON GAIT SOUTH (NK9)
Date: 05 November 2016 07:42:51

Dear Sir/Madam,

I would like to object to the following planning applications: SALTCOATS (NK7) and FENTON GAIT EAST (NK8) and FENTON GAIT SOUTH (NK9).

My reasons for this are as follows:

There combined sites will put too much strain on my village.

Our school and doctors' surgery will not be able to cope with what would be a staggering increase in population.

Our roads, already under-serviced, will become clogged, especially during school drop off and pick up times.

These proposals are environmentally unfriendly. Why don't they at least use the Fire College site?

Please contact me if you have any further questions.

Andrew-Henry Bowie

From:
To: [Local Development Plan](#)
Subject: Objection to the inclusion of 3 greenfield sites SALTCOATS (NK7), FENTON GAIT EAST (NK8), FENTON GAIT SOUTH (NK9)
Date: 05 November 2016 08:54:39

It actually surprises me if I am honest that we even find ourselves in a position of having to object to something which is so incredibly ludicrous that if the planners had stepped back and considered this for 2 minutes they would very quickly have discounted it. When considering where to develop, surely the following questions are asked:

1. are there good transport links?
2. Are the local facilities sufficient /Is there sufficient capacity at the local school/doctors etc?
3. Are there jobs in this local community that result in a housing shortage and therefore the need specifically within this community?

In the case of Gullane the answer to ALL 3 questions is unequivocally NO; and given the question to no. 1 is NO, I would not go further in analysing/considering this as a suitable area for development. Gullane is not near the A1; Gullane does not have a train station; Gullane has 1 A road and mainly B roads all around it. It is completely crazy and leads me to the only conclusion-the developers are driving this and the Council has allowed this to be the case. There is, in my mind, no other logical reason for housing construction of this scale to be even remotely considered in a village of this size. There are better places with better transport links not that far away; but the reason for 3 greenfield in addition to 1 brownfield site being put on the map in Gullane is because for the developers, Gullane is an attractive location and the houses will sell easily. This is scandalous. What boxes does Gullane tick when you consider sites for development?

I am not saying a blanket NO to all development-every area needs to take its fair share. The development of the old fire training school site would be our community taking its fair share share. This would be absorbed into the village - yes, school places would have to be considered as well as impact to the medical services we have locally; and it would be yet more people on the appalling roads we have heading for the ridiculous by-pass; or heading to Drem station where there is a shortage of parking spaces. However we would work hard as a community to make this work and Gullane will remain the special place it is today attracting tourists and golfers in high numbers. One development will not spoil Gullane; 4 developments will destroy Gullane.

Why would you even consider spoiling all of that by adding 3 greenfield sites (SALTCOATS (NK7) and FENTON GAIT EAST (NK8) and FENTON GAIT SOUTH (NK9)) into the equation. Completely crazy, ill thought through, and verging on scandalous and incompetent.

Karen Chapman

Dr CE Thackwray

4 November 2016

Objections to the new Local Development Plan: I write to request SALTCOATS (NK7) and FENTON GAIT EAST (NK8) and FENTON GAIT SOUTH (NK9) are removed from the proposed LDP as sites for housing development.

I object to the inclusion of these Greenfield sites in the LDP. The 4 Housing Sites in Gullane are poor planning for the following reasons: -

The developments are not sustainable, having poor access to employment and services.

They would damage future opportunities for leisure and recreation in one of the region's most attractive locations and have negative impacts on the amenities of local people. They would also damage any long-term tourism revenue with over-development.

In the short term if development went ahead access to the village and roads out of the village would be badly affected. This would have an impact on residents, local traffic and tourism. In the long term we will see traffic increase to unsustainable levels at all times throughout the year on a road network and village environment along the A198 corridor that already cannot cope with the capacity or parking issues.

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

For the size of Gullane the inclusion of all 4 sites in the LDP is very unbalanced and overestimates the capacity of Gullane to absorb what will be a 1/3 increase in housing, population, car traffic, and all its planning, living, environmental issues. In addition if all these sites stay in the plan then Gullane will contribute 50% of all the new sites from the North Berwick Coastal area.

The cumulative impact on Gullane has not been properly assessed, nor has the impact on the rural road network, and in particular for the C111 towards West Fenton, where its use by its many vulnerable users will become impossible. There are many residents who use this road network for cycling, walking, running and walking their dogs. Traffic in any increase would negate this and go against other parliamentary plans to push for green, sustainable and people friendly safe environments.

Access to public transport (trains in particular) falls well below what would be needed particularly for Saltcoats (NK7). Already the trains cannot cope with capacity at rush hour or holiday periods and parking is overfull at Drem and North Berwick.

Facilities in Gullane are at the opposite end of the village to the 4 development sites. Even simple errands will demand a car journey. Also the cumulative effect on the Gullane Conservation Area will ruin the village amenity, affect tourism and create road safety issues arising from awkward and non-existent parking.

More importantly, the inclusion of the two major Greenfield sites would compromise the delivery of the Brownfield site. Community facilities, in particular the Village Hall, cannot meet increased level of demand. The scale of change and the duration of development which will, realistically, be more

than 10 years, will prove extremely difficult to mitigate and badly affect tourism and day to day life in the Village and the surrounding area to an unreasonable level. And finally the impact on school and medical facilities will be significant. Recent housing developments in Gullane have resulted in an average of 1 school pupil per new house. The proposal from East Lothian Council for only two additional classrooms were all the sites to proceed is totally inadequate as is any development of plans for improving transport links and social infrastructure.

Thank you

Dr CE Thackwray

From:
To: [Local Development Plan](#)
Subject: Representation to LDP Proposed Plan - Longniddry South for WME/SCC
Date: 05 November 2016 09:35:28
Attachments: [Representation to FLC Proposed Plan on behalf of WME_SCC 051116.docx](#)
[Representation to FLC Proposed Plan Draft Contributions Framework on behalf of WME_SCC 051116.docx](#)

Please find attached a representation made on behalf of Wemyss & March Estate/Socially Conscious Capital in respect of land at Longniddry South. There are two individual representations as follows;

- to the Proposed Plan.
- to the Draft Developer Contributions Framework - Supplementary Guidance.

I'd be very grateful if you could acknowledge safe receipt of this submission by return.

Regards

Marc

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EAST LoTHIAN LOCAL DEVELOPMENT PLAN – PROPOSED PLAN

CONSULTATION RESPONSE FROM WEMYSS & M ARCH ESTATE AND SOCIALLY CONSCIOUS CAPITAL (WME/SCC)

Ryden is pleased to submit this response to East Lothian Council Local Development Plan (LDP) Proposed Plan on behalf of the Wemyss and March Estate and Socially Conscious Capital. The Wemyss and March Estate (WME) has extensive land holdings both in and around Longniddry, East Lothian and this submission is made without prejudice to their other interests.

Together with Socially Conscious Capital (SCC) the Estate is promoting a masterplan for the expansion of Longniddry village to the south. Longniddry South is an exceptional opportunity for development at a sustainable location.

Section 1 – Introduction

No Comment

Section 2 – Spatial Strategy for East Lothian

Modification Proposed

No modifications proposed however please see comments on Strategy below.

Justification for Modification

WME/SCC welcomes and supports the spatial strategy for East Lothian. It accepts the merits of seeking to deliver compact growth with a focus on the west of East Lothian, closest to sustainable transport hubs, the Edinburgh labour market and main Housing Market Area.

WME/SCC notes the failure to find an “appropriate comprehensive solution” that could deliver the Council’s vision for a larger single settlement at Blindwells. The proposed expansion of Blindwells to the east and for up to 6,000 homes therefore remains an aspiration at best. WME/SCC also notes that SESplan 2, also at Proposed Plan stage, highlights the need for more effective partnership working to deliver the vision of this large new town.

To date, there has been a failure to demonstrate that Blindwells is an effective site for any development, let alone 6,000 units and a sub-regional town centre. The spatial strategy continues to rely on this site despite a lack of evidence to suggest it will be developed.

The challenge for ELC is housing delivery and maintaining an effective land supply. The Proposed Plan is clear about the difficulty of sustaining the completion rates necessary to deliver the housing requirement set by SESplan and as such, ELC’s priority must be to promote effective sites.

If this allocation is to remain then it must be supported and justified by a robust assessment demonstrating how and when it can deliver homes. Moreover, ELC

should consider the merits of retaining this allocation into another LDP review if an appropriate comprehensive solution is not identified within the current plan period.

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

Modification Proposed

No modifications sought. Please see comments below.

Justification for Modification

WME/SCC supports the inclusion of Longniddry South as a mixed use proposal within the Proposed Plan (site PS1).

An application for Planning Permission in Principle (PPiP) proposing a residential development of 450 new homes has already been submitted and a further detailed planning application for the conversion of the Longniddry Farm Steadings for mixed use development is currently being prepared and will be submitted to East Lothian Council (ELC) in early course. WME/SCC is firmly committed to delivering this development which is a key component of the Council's spatial strategy over the lifetime of this LDP.

In the absence of other significant allocations within the cluster, the early delivery of housing and developer contributions at Longniddry South is highly desirable. It will assist ELC with the delivery of its overall spatial strategy and urgently needed homes – both market and affordable and provide an early injection of funding for those infrastructure interventions associated with the Council's overall spatial strategy.

It is hoped that ELC, in determining these applications will afford due weight to the Proposed Plan as a significant material consideration.

Section 2b – Introduction to Prestonpans / Cockenzie / Port Seton / Longniddry Cluster (pg 24)

Modification Proposed

Amend Paragraph 2.53 to clarify that the platform lengthening proposal is simply an aspiration at this time, which will only take place once funding is secured through partnership working with Network Rail and the ScotRail franchisee. In its current form the LDP implies a firm proposal with funding committed. That is not our understanding having considered the supporting documents to the LDP.

Justification for Modification

A more accurate representation of the role of developers and key infrastructure agencies and the importance of securing funding, is required. ELC may be the authority proposing the changes but it is not the agency responsible for funding or delivering them. In its current form the LDP is not clear on this point.

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

Modification Proposed

No modifications are sought.

Section 3b Education, Community & Health and Social Care Facilities and Open Space and Play Provision (p74-87)

Modification Proposed

Paragraph 3.81 should be amended to address the impact on capacity at Preston Lodge High School (PLHS) if Blindwells (including the initial 1,600 homes allocation) does not come forward within the forecast period. On this basis, the potential impact on the school's capacity will be significantly reduced.

Justification for Modification

WME/SSC welcomes Prop ED2 which commits an additional phased permanent extension to PLHS to meet the need arising from all proposed housing development within the cluster, including the Blindwells allocation. It also welcomes the Council's commitment to provide additional, phased, permanent extensions to Longniddry Primary School (LPS) to meet the need for housing development in the cluster.

It is acknowledged that additional space will be required at PLHS as a direct consequence of the development proposal at Longniddry South, which is forecast to generate a further 72 pupils (over time) for PLHS. However, there continues to be doubt over if and when Blindwells can deliver any new homes.

It would be advisable for ELC to adopt a nuanced and flexible approach to education impacts in this cluster. A transparent assessment of what the impact would be on PLHS if Longniddry South and other developments in the cluster came forward for development without Blindwells being delivered (or significantly in advance of Blindwells) should be considered and included within the Plan.

There remains significant uncertainty over the likelihood of Blindwells delivering new homes. This flexible approach would also recognise the fact that at present, Blindwells is not in the PLHS catchment area.

Section 4 Our Infrastructure & Resources (p 88-117)

Modification Proposed

Paragraph 4.2 should be amended to clarify that the Local Transport Strategy (LTS) is not a delivery strategy but a long term vision for an area. It should also clarify where responsibility lies for delivering the various elements of the LTS Vision and the level of commitment ELC has from these agencies/service providers (including Network Rail ScotRail, Transport Scotland).

Prop T9 should be modified to clarify which agency will be delivering station car parks and that, where appropriate, developers should contribute towards the cost of station car park extensions.

Prop T10 should be removed from the Proposed Plan or alternatively, amended to remove the reference to developer contributions relating to platform lengthening.

Justification for Modification

The delivery of infrastructure is a critical consideration for any Local Development Plan. This section of the LDP on Transport fails to convey what agency or organisations will be responsible for funding and delivering that infrastructure.

It also fails to indicate whether the delivery of this infrastructure forms part of any of those agencies' corporate plans or if there is committed funding in place.

Furthermore, it is unclear whether there is any agreement/support from agencies such as Transport Scotland, Network Rail and ScotRail Abellio for the LTS vision in relation to the rail network in this area.

This latter point is of critical importance when considering ELC's ability to raise developer contributions towards these projects. If these projects do not have the support of the key agencies who will deliver them, it is not clear whether they are deliverable even with developer contributions. It is also unclear if they are supported in principle by the relevant agency. This is not a transparent and workable basis for seeking developer contributions towards these infrastructure interventions.

Moreover, where such improvements can only be achieved with the agreement of relevant agencies or organisations, it is important that the LDP's allocations cannot then be held to ransom by those same agencies because the developments have been made entirely conditional on those improvements proceeding. In such cases, it may be appropriate for the developers to contribute towards the costs of those improvements, but not to be made responsible for implementing them.

The proposed rail related interventions which are included in the Transport Appraisal (which supports the LDP) as interventions requiring developer funding are PROP T9 and PROP T10. This 'Rail Station Package' includes station platform lengthening at Prestonpans, Longniddry and Drem Stations to accommodate eight car train sets and Station Car Park extensions at Drem and Longniddry. The requirement for eight-car train sets serving Longniddry is not justified in any detail within the LDP Transport Appraisal, which only indicates that there is likely to be an impact on journey choice in Musselburgh, Tranent and Wallyford, with no stated significant impact to Longniddry.

Therefore, there is an obvious disconnection between PROP T10 and the Developer Contributions Framework - Supplementary Guidance. The safeguarding of land for future platform lengthening is one thing. However, what is actually being requested is developer contributions towards the delivery of platform lengthening and not simply confirmation that land will be safeguarded.

Appendix 1 – Contribution Zones

Modification Proposed

Amend contribution zone for Salters Road Interchange A1(T)

Justification for Modification

Local junction modelling has been undertaken for this junction as presented in the supporting Transport Appraisal. However, there is no gravity model and traffic assignment presented for each of the proposed LDP site allocations.

The Salter's Road A1(T) Interchange primarily serves Whitecraig and Wallyford and the potential impact of development at PS1 - Longniddry South on this junction is expected to negligible.

Unless ELC can confirm the impact of the proposed allocation with detailed trip assignments/traffic modelling results then the PS1 - Longniddry South must be removed from the Salters Road Interchange contribution zone.

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

Dear Mr McFarlane

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

- PROP MH12
- PROP MH13

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

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

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

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

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

Removal of this site from the development plan.

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

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

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

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

Yours sincerely

Name:

Address:

.....



04 November 2016
16 11 04 Fenton Barns Written Representation.docx

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Sent by email to ldp@eastlothian.gov.uk

Dear Sir / Madam

**East Lothian Council Local Development Plan - Proposed Plan
Representation on behalf of Stewart Milne**

On behalf of Stewart Milne Group Ltd (Stewart Milne) we are submitting these representations to the Proposed East Lothian Local Development Plan to object to the non inclusion of land at Fenton Barns. We propose this should be allocated within the East Lothian Local Development Plan for a new settlement. The land was previously identified within the Council's Main Issues Report (MIR) within an area of search for housing development in this part of East Lothian to be brought forward for short, medium and potentially long term housing development through the preparation of a masterplan for the immediate area.

Stewart Milne controls 77 hectares of land in this location which is shown on the enclosed site location plan, edged red. It consists of two land parcels, one to the north and one to the south of the existing employment uses at Fenton Barns. Stewart Milne together with the neighbouring land owners who are represented by Wallace Land agree that a masterplan for the wider area should be brought forward. In order to illustrate how this land can be masterplanned, we have prepared and submitted a Development Framework Report (DFR) with these representations. This illustrates how such a masterplan could be brought forward to deliver the significant levels of housing identified as need within the area of search at Fenton Barns, to assist East Lothian Council in meeting short, medium and long term housing delivery.

The proposed spatial strategy and the discussion on matters relating to future development within the Proposed Plan are therefore of particular interest to Stewart Milne and we wish to make the following observations on their behalf.

**1a. Additional Comments - What additional modifications do you wish to see made to the Proposed Plan? Your justification for this will be sought in the next question.
Modifications(s) Sought**

The land surrounding the existing employment areas at Fenton Barns, as identified on Figure 5 of the DFR, is allocated as a new settlement with capacity for up to 6000 homes and appropriate commercial uses along with a policy to guide its future development through a master planning brief. Notwithstanding that, the flexibility contained within the Main Issues Report (MIR) would allow an initial settlement of up to 1,000 homes.

1b. Please give any information/reasons in support of each additional modification suggested to the proposed Plan.

Justification for Modification(s)

Please upload any supporting material to each additional modification suggested to the proposed Plan.

A Development Framework Plan (DFR) has been submitted with these representations in support of the inclusion of land at Fenton Barns, to illustrate and justify how a new sustainable settlement at Fenton Barns can be delivered.

We support the Other Site Option OTH-N11 set out in Table 24 on page 150 of the MIR which states:

'If a major development were to be promoted here there are broadly two options:

- 1) to make it of a size that would be able to support a new primary school at circa 1000 homes, or*
- 2) to make it of a size that would support a new secondary school at circa 5000 - 6000 homes. In the case of the former it is unlikely that such a scale of growth would support a reasonable range of local amenities and facilities; this would likely require a scale of growth equivalent to that needed to support a new secondary school.'*

This representation demonstrates that the land around Fenton Barns is capable of accommodating a significant new development of up to 6,000 homes and appropriate commercial uses which could provide for a significant level of new housing and a fully functioning new settlement within East Lothian over the next 20-30 years. Notwithstanding that, the flexibility contained within the MIR would allow an initial settlement of up to 1,000 homes to be allocated.

If the Council is minded to support Option 2, the DFR illustrates the creation of an extended community of up to 6,000 homes and appropriate commercial uses and how this can be delivered through a policy led masterplanned approach. Furthermore, there could also be an opportunity to create a railway stop on the local line which runs towards North Berwick, to the east of Fenton Barns which would provide increased public transport accessibility to the expanded settlement without delaying existing rail traffic on the East Coast Mainline.

Fenton Barns is an existing cluster which employs approximately 550 people across circa 70 businesses. It already has housing, leisure and retail uses. As such, the existing employment hub and other uses including residential, form the foundation for creating a larger sustainable settlement in this location. It is considered an appropriate location for additional housing and commercial uses of an appropriate scale and which would be sensitively sited in a planned approach.

Within the context of the approved SESplan (2013), the Spatial Strategy promotes a sustainable pattern of growth which will promote and secure economic growth and the delivery of housing in the most sustainable locations using an infrastructure led approach. A new settlement at Fenton Barns is appropriate, given that the A1/East Coast Mainline Corridor is a focus for further development and the majority of the land surrounding Fenton Barns is within the East Lothian SDA and East Lothian Central – Area 22, an area where development is preferred.

The SESplan Proposed Plan recognises that initially sites around existing East Lothian settlements will provide a significant amount of land to meet the housing requirements of the council area. Notwithstanding, in the future it suggests there may be a need for a second new settlement in the east of East Lothian (Para 3.13). A new settlement at Fenton Barns sits well with this requirement and for new housing within sustainable locations

The adopted East Lothian Local Plan (2008) strangely does not identify Fenton Barns as a settlement, given that the nearby smaller hamlet of Kingston is allocated as settlement. Given the existing size and function of Fenton Barns, it should be allocated as a settlement in its own right, which can feasibly incorporate residential development to the west. As clearly set out within the supporting DFR, Fenton Barns already has the attributes of an active settlement with people living, working and spending leisure time there.

Fenton Barns should be considered ahead of Drem as the central hub of any residential settlement within the area of search previously identified in the MIR. Drem contains a conservation area which comprises the whole village and land to the north. As such, the creation of circa 1,000 homes surrounding Drem would be inconsistent with the village character and the sensitive scale of development within the immediate townscape and wider landscape setting. It is judged that any development at Fenton Barns would have a negligible impact on Drem Conservation Area given their distance apart.

The MIR 'Potential Drem Expansion Area of Search' (Site reference OTH-N11), is partly within the East Lothian SDA. Notwithstanding, the 'Proposed LDP Environmental Report Appendix 10' contains an assessment of the potential sites at Fenton Barns that were put forward for development during the MIR stage of the LDP. The assessment of the subject land (site reference MIR/NK/HSG121a) stated that the land should be '*considered as part of the SDA*'.

The East Lothian Proposed Plan recognises that the implementation of the current compact spatial strategy will result in environmental and infrastructure constraints in the west of East Lothian. Paragraph 2.11 of the Proposed Plan states

'In future these constraints may dictate that settlements in the east of East Lothian need to play a more prominent role as part of a more dispersed spatial strategy: there may also be a need to consider if more than one new settlement in the area is required.'

We support a shift in focus from the west to the east of the East Lothian SDA for future development. The land at Fenton Barns is in an appropriate location and is well related to the adjacent employment uses and existing community infrastructure which can be enhanced through the development of a masterplan for the area. Other identified major development projects in the west of the SDA, such as Blindwells, require substantial infrastructure at a significant cost to be implemented before housing can be delivered.

Blindwells has an existing allocation in the current East Lothian Local Development Plan for 1,600 houses. Despite no housing having been built to date, the Council has safeguarded further land to the east to expand to a size of 6,000. Whilst housing may eventually come forward here, the Council must diversify the options for significant housing growth by ensuring that there are a range of opportunities identified in its forthcoming Local Development Plan. Only then will East Lothian have a credible and effective 5 year housing land supply as required by Scottish Planning Policy (SPP).

The land surrounding Fenton Barns has the potential to provide the full allocation of up to 6,000 houses and appropriate commercial uses which the Council suggested could be achieved in the Drem / Fenton Barns Area of Search within the MIR.

There is an opportunity to create a new railway stop to the east of Fenton Barns, which would not only provide a sustainable transport node, but lessen the amount of cars on the surrounding roads. To accommodate the proposed development, infrastructure improvements will be required to the surrounding roads and waste water network however, in contrast to infrastructure investment required for schemes in the west of the SDA, the works at Fenton Barns are minimal and demonstrate the deliverability of a residential scheme in this location.

Fenton Barns represents a great opportunity to create a new masterplanned Scottish settlement, building upon the existing employment hub to create a vibrant, sustainable mixed use community and delivering East Lothian Council a generous supply of housing land for the short, medium and long term development of the area.

The MIR noted potential constraints in respect to Potential Drem Expansion Area of Search (Site reference OTH-N11). These included a main Pink Footed Geese feeding area, flood risk and a nearby gas pipeline. None of these relate to the subject land to the west of Fenton Barns. The submitted DFR addresses all the key considerations required for a new settlement at Fenton Barns, concluding that the site is suitable for the new settlement.

Summary

Stewart Milne interests in the Proposed Plan relate to how the Council envisages the future housing land supply for East Lothian, in particular the opportunity to allocate up to 6,000 houses envisaged in the area of search at Fenton Barns.

We therefore object to the non inclusion of land at Fenton Barns within the Proposed East Lothian Local Development Plan, and provide support in the form of the Development Framework Report for inclusion of the land surrounding the existing employment areas at Fenton Barns as a new settlement with capacity for up to 6,000 homes and appropriate commercial uses along with a policy to guide its future development through a master planning brief. Notwithstanding, we support an initial allocation of the land to the west of Fenton Barns for a smaller first phase of residential development in the region of up to 1000 homes.

We trust that the above comments and submitted DFR will be taken into consideration in finalising the LDP Proposed Plan for Examination.

Please do not hesitate to contact me should you have any queries or require any further information.

Yours faithfully

Adam Henry
Senior Planner

Enc.



Fenton Barns Development Framework Report
East Lothian Local Development Plan – Proposed Plan
On behalf of Stewart Milne Group Limited
November 2016

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This document has been prepared by Savills (UK) Ltd on behalf of Stewart Milne Homes.
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Site Location



Executive Summary

Stewart Milne Group Ltd (Stewart Milne) control 77 hectares of land at Fenton Barns in East Lothian as shown on the enclosed site location plan, edged in red. It consists of two land parcels to the north and south of the existing employment uses at Fenton Barns. Stewart Milne together with the neighbouring land owners who are represented by Wallace Land agree that a masterplan for the wider area should be brought forward. In order to illustrate how this land can be masterplanned, we have prepared and submitted a Development Framework Report (DFR) with these representations. This illustrates how such a masterplan could be brought forward to deliver the significant levels of housing proposed in the area of search at Fenton Barns, to assist East Lothian Council (the Council) in meeting short, medium and long term housing need.

Stewart Milne object to the non inclusion of land at Fenton Barns within the Proposed East Lothian Local Development Plan, and provide support in the form of this Development Framework Report for inclusion of the land surrounding the existing employment areas at Fenton Barns as a new settlement with capacity for up to 6,000 homes and appropriate commercial uses along with a policy to guide its future development through a master planning brief. Notwithstanding, we support an initial allocation of the land to the west of Fenton Barns for a smaller first phase of residential development in the region of up to 1000 homes. An allocation of this level could allow the Council to establish how the larger scheme could provide an attractive sustainable settlement.

Fenton Barns is an existing cluster which employs approximately 550 people across circa 70 businesses and already has housing, leisure and retail uses. As such, the existing employment uses form the foundation for creating a settlement in this location. It is considered an appropriate location for additional housing which would be brought forward to respond to the existing village fabric and incorporate the highest standards of placemaking as set out in Scottish Government Planning Policy.

This document demonstrates that all physical aspects of the development can be absorbed sensitively into the environment and appropriately mitigated where required. Professional input has been aided by the following parties.

- Savills (UK) Ltd – Planning
- Mccreadie Design – Masterplanning and Landscaping
- Dougall Baillie Associates Ltd – Highways, Access and Servicing
- EnviroCentre Limited – Ecology
- GUARD Archaeology Limited - Archaeology
- David S Alexander - Education Consultant

This representation should be read in conjunction with the Homes For Scotland representation and other representations made by Stewart Milne to the Proposed Plan.

1. Introduction

This DFR is submitted on behalf of Stewart Milne to illustrate how a new sustainable settlement at Fenton Barns can be successfully delivered. This report demonstrates how the land surrounding the existing employment areas at Fenton Barns is suitable to be allocated as a new settlement with capacity for up to 6000 homes along with a policy to guide its future development through a master planning brief. Furthermore, there could also be an opportunity to create a railway stop on the local line which runs towards North Berwick, to the east of Fenton Barns which would provide increased public transport accessibility to the expanded settlement.

The land was previously identified within the Council's MIR within an area of search for housing development for short, medium and potentially longer term housing development through the preparation of a masterplan for the immediate area. We support this Other Site Option OTH-N11 set out in Table 24 on page 150 of the MIR which states:

'If a major development were to be promoted here there are broadly two options:

1) to make it of a size that would be able to support a new primary school at circa 1000 homes, or

2) to make it of a size that would support a new secondary school at circa 5000 - 6000 homes. In the case of the former it is unlikely that such a scale of growth would support a reasonable range of local amenities and facilities; this would likely require a scale of growth equivalent to that needed to support a new secondary school.'

Fenton Barns is an existing cluster which employs approximately 550 people across circa 70 businesses. It already has housing, leisure and retail uses. As such, the existing employment uses form the foundation for creating a settlement in this location. A new settlement would provide further retail and employment uses, which will bring further benefits to the surrounding local and wider community. It is

considered an appropriate location for additional housing of an appropriate scale and would be sited in an appropriate manner

Stewart Milne is aware that developer contributions will be required as part of the new settlement, and will provide the necessary contributions in scale and kind including amongst others public transport improvements and public realm. The affordable housing level will also be fully addressed as part of any future proposal.

2. Planning Policy Considerations

National Planning Policy

Scottish Planning Policy (SPP) (2014)

The Scottish Government published its updated Scottish Planning Policy (SPP) in June 2014. This document sets out national planning policies which reflect Scottish Minister's priorities for operation of the planning system and for the development and use of land. The SPP introduces a presumption in favour of development that contributes to sustainable development.

SPP gives strong support to housing development and, indeed, any sustainable development for which the SPP introduces a presumption in favour (SPP Policy Principles). SPP identifies that planning helps to address the challenges facing the housing sector by providing a positive and flexible approach to development. In particular, provision for new homes should be made in areas where economic investment is planned (Para. 109). It is considered that this is such a sustainable location, given the significant established employment, retail and other amenities at Fenton Barns.

National Planning Framework 3 (2014)

The Scottish Government published the National Planning Framework 3 (NPF3) in June 2014. This document sets out the long term vision for development and investment across Scotland for the next 20 to 30 years. NPF3 states the Scottish Government's central purpose is *"to create a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth"* (Para.1.1).

NPF3 confirms that the population of Scotland is projected to rise from 5.31 million in 2012 to 5.78 million in 2037. Based on 2010 projections, a 23% increase in the number of Scottish households is projected by 2035. East Lothian is identified as one of the local authority areas where growth is projected to be highest (Para. 2.4).

The Scottish Government states that planning should focus housing provision efforts on areas where there is pressure for change and where the greatest levels of change are expected, East Lothian can be considered such an area with great pressure for housing development given the projected household increases.

Following the recognition that housing needs are projected to increase, NPF3 notes that the financial climate has reduced the amount of new housing built in recent years. The desire to see a significant increase in house building to ensure housing requirements are met across the country over the coming years is stated (Para 2.5).

More ambitious and imaginative planning is called for to meet requirements for a generous and effective supply of land for housing in a sustainable way. Furthermore, NPF3 states that planning can ensure it enhances quality of life through good placemaking, and lead a move towards new, lower carbon models of urban living (Para 2.20). Fenton Barns is just such a location.

Regional Planning Policy

SESplan Strategic Development Plan (2013)

SESplan, is a partnership of six member authorities including Edinburgh, East Lothian, Midlothian, Fife, Scottish Borders and West Lothian, working together on strategic development planning matters. Along with supplementary guidance, SESplan sets the spatial strategy for the six member authorities until 2032.

The Spatial Strategy promotes a sustainable pattern of growth which will promote and secure economic growth and the delivery of housing in the most sustainable locations using an infrastructure led approach. A new settlement at Fenton Barns is appropriate, given that the A1/East Coast Mainline Corridor is a focus for further development and the majority of the land surrounding Fenton Barns is within the East Lothian SDA and East Lothian Central – Area 22, an area where development is preferred.

SEsplan Proposed Strategic Development Plan, October 2016

The Proposed Plan sets out the vision and broad development patterns and levels for the city region over 20 years from 2018. When approved in 2018 it will replace the current Strategic Development Plan and will inform the next set of Local Development Plans.

The Proposed Plan recognises that initially sites around existing East Lothian settlements will provide a significant amount of land to meet the housing requirements of the council area. Notwithstanding, in the future it suggests there may be a need for a second new settlement in the east of East Lothian (Para 3.13). A new settlement at Fenton Barns sits well with this requirement and for new housing within sustainable locations

With respect to the Spatial Strategy identified within the Proposed Plan, Figure 3.1 within the document identifies Long Term Growth Corridors which are of primary importance for long term strategic growth beyond 2030. The land at Fenton Barns adjoins the identified growth corridor linking Drem to North Berwick, and Figure 5 the Development Framework Plan (DFP) demonstrates the opportunity to create a railway stop to serve the new settlement. As such, Fenton Barns is a highly sustainable location for a new settlement.

Local Planning Policy

East Lothian Proposed Local Development Plan, September 2016

The Proposed Plan sets out a development strategy for the future of East Lothian to 2024 and beyond, as well as a detailed policy framework for guiding development. It is noted that constraints in the west of East Lothian will mean settlements in the east of East Lothian will need to play a more prominent role in the dispersed spatial strategy, with the need for a new settlement in the east of East Lothian identified (Para. 2.11). We consider the inclusion of the land surrounding the existing employment areas at Fenton Barns as an appropriate and sustainable location for a new settlement with capacity for up to 6,000 homes.

National Design Guidance Overview

Development Frameworks help to deliver planning policy requirements by setting out the main planning and design principles to which subsequent masterplans will conform. Scottish Planning Policy and associated documents require that land and resources are used efficiently. A new settlement at Fenton Barns would include planning for integrated transport with an appropriate mix of land uses and offering a full range and choice of housing types, forms, sizes and tenures.

The Scottish Government places great emphasis on improving the design of all new development to reflect the character of the area within which it is to be located, as well as creating mixed communities that are safer, more inclusive and provide new residential streets that are both attractive and safe for all to use.

Additionally, developments of this scale must provide a range of house types, sizes and tenures including affordable housing, as well as the necessary enabling and supporting facilities and infrastructure. This includes mitigation of any impacts on education facilities, the provision of open space, play areas, a sports pitch and related changing accommodation as well as opportunities for local retail, employment and community use. The DFP which has been prepared provides an indicative layout of the proposed new community at Fenton Barns.

New residential development should produce mixed communities where opportunities to live, work and play are located side by side. This is to be achieved at higher densities by designs that respond to the context and qualities of a site and its surroundings. From this, positive relationships between buildings are to be created to produce a sense of place, identity and welcome, and to clearly define public from private space. Designs are to provide a hierarchy of attractive streets and spaces that are defined by buildings that reflect local architectural styles. This will result in distinctive new places in which it is easy for people to find their way around. Such places must also be designed to a human scale, be resource efficient and adaptable. Central to this is a network of well-connected, attractive and enclosed public spaces that are safe, pleasant, and easy to move around, especially on foot and cycle. Fenton Barns provides a real opportunity to deliver a well planned settlement around an established employment, retail and amenity area.

3. Landscape and Visual Impact

Landscape Character

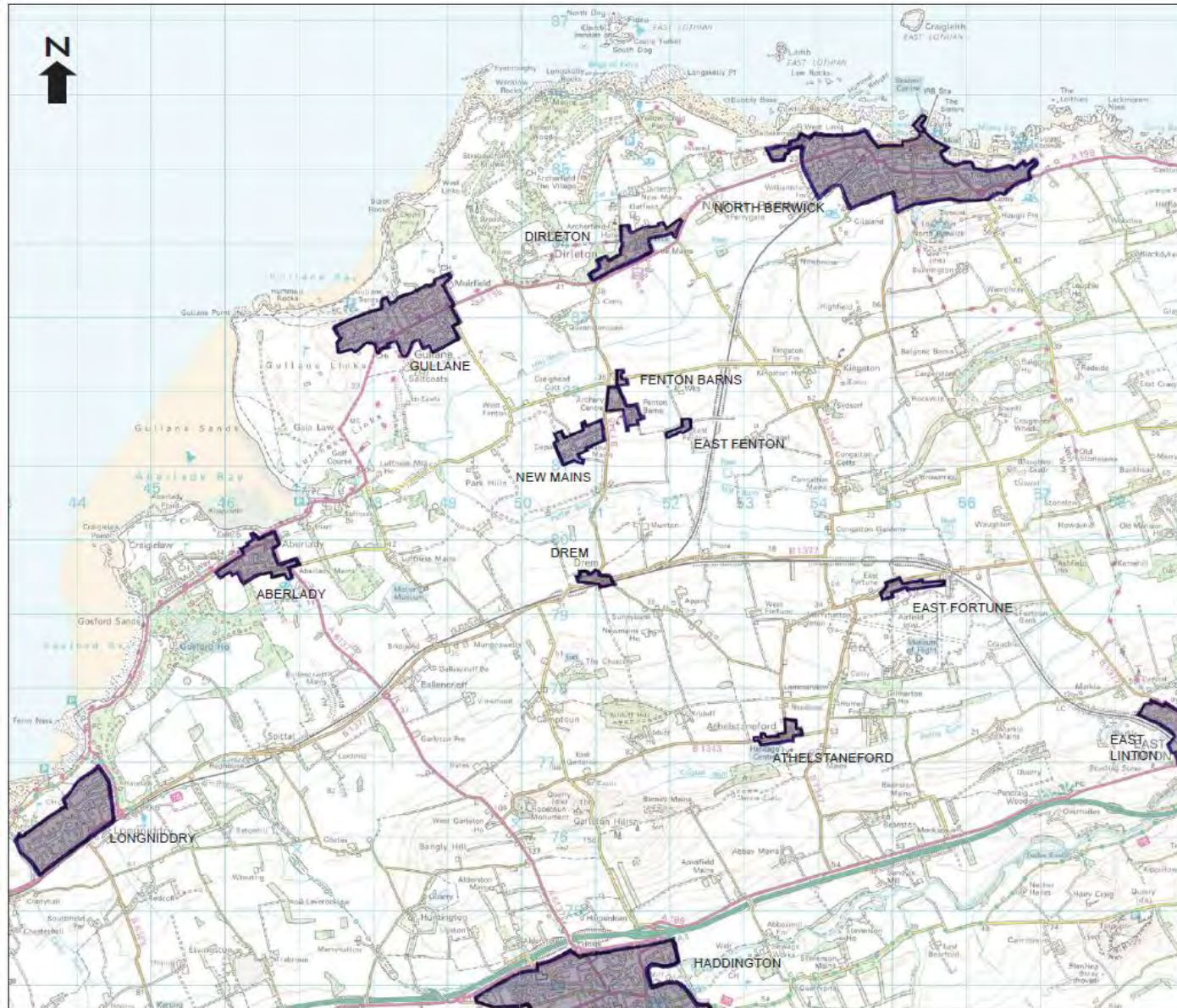
The extended land holding at Fenton Barns is located within the North Berwick Plain Landscape Character Area (LCA) of the Coastal Margins Landscape Type as defined in the Lothians Landscape Character Assessment published by Scottish Natural Heritage (SNH) in 1998. In describing this LCA, SNH note that “settlement is concentrated mainly along the coastal fringe” (Page 76) however, it is acknowledged that there is, in relation to development, “potential wider pressure from successful tourism and recreation industry”. (Page 75) In addition, it is acknowledged that there is “pressure for residential expansion of coastal settlements” and in relation to regional planning policy, East Lothian as a whole however, this must be viewed in the context of the “high visual sensitivity of immediate coastal zone”. (Page 75)

Whilst it is acknowledged that the northern part of the North Berwick Plain LCA is “virtually flat” the land towards the middle and south of the LCA does have a gently undulating character as the land begins to rise towards the Garelton Hills which form part of the Lowland Hills and Ridges Landscape Type. This “landscape of great diversity”, extending also into the Haddington Plain LCA, has provided a rich context to the establishment of a broad range of “locally distinctive villages, farmsteads and mansions” (Page 75) which are seen scattered across the landscape linked by a network of roads and lanes.


Woodland cover is, as described by SNH, often limited to “small tree clumps, shelterbelts and a scattering of hedgerow trees” across the central part of the North Berwick Plain LCA with the “major policy woodlands.....forming outstanding landscape features” (Page 74) established around the edge, to the north and east at Archerfield, Luffness and Gosford and Tynninghame and Biel to the east and south east.

The generally flat to gently undulating landscape with limited tree cover allows views to open up at locations across the Plain exposing a settled and well managed landscape incorporating a “large scale network of fields”. (Page 74) The key characteristics and “pattern of terrain” (Page 75) allow the major infrastructure networks which cross this part of East Lothian to remain generally unobtrusive although the local road network, often involving near straight lengths of carriageway edged by hedges, walls and/or fences, is regularly seen cutting across the landscape linking the villages, farmsteads and mansions which combine to give the area its distinctive settlement pattern. (Figure 1 Existing Settlement Pattern – North Berwick Cluster)

In some areas of the LCA business and/or tourism activities have led to an increase in the size and profile of a particular settlement taking advantage of the area’s location and in turn, accessibility advantages. At Fenton Barns the growth of the retail and farm diversification business activities has led to a significant expansion of the built form in this area, drawing visitors in from around the Lothians and beyond. Fenton Barns is located essentially across a local ridge line with in part a south facing aspect overlooking the shallow valley formed by the Peffer/Mill Burn. The conservation village of Drem is located on the southern edge of the valley, on land which continues to rise to the south towards the Garelton Hills, part of the Lowland Hills and Ridges Landscape Type. (Figure 2 Landscape Context)



LEGEND

 EXISTING SETTLEMENT EXTENTS

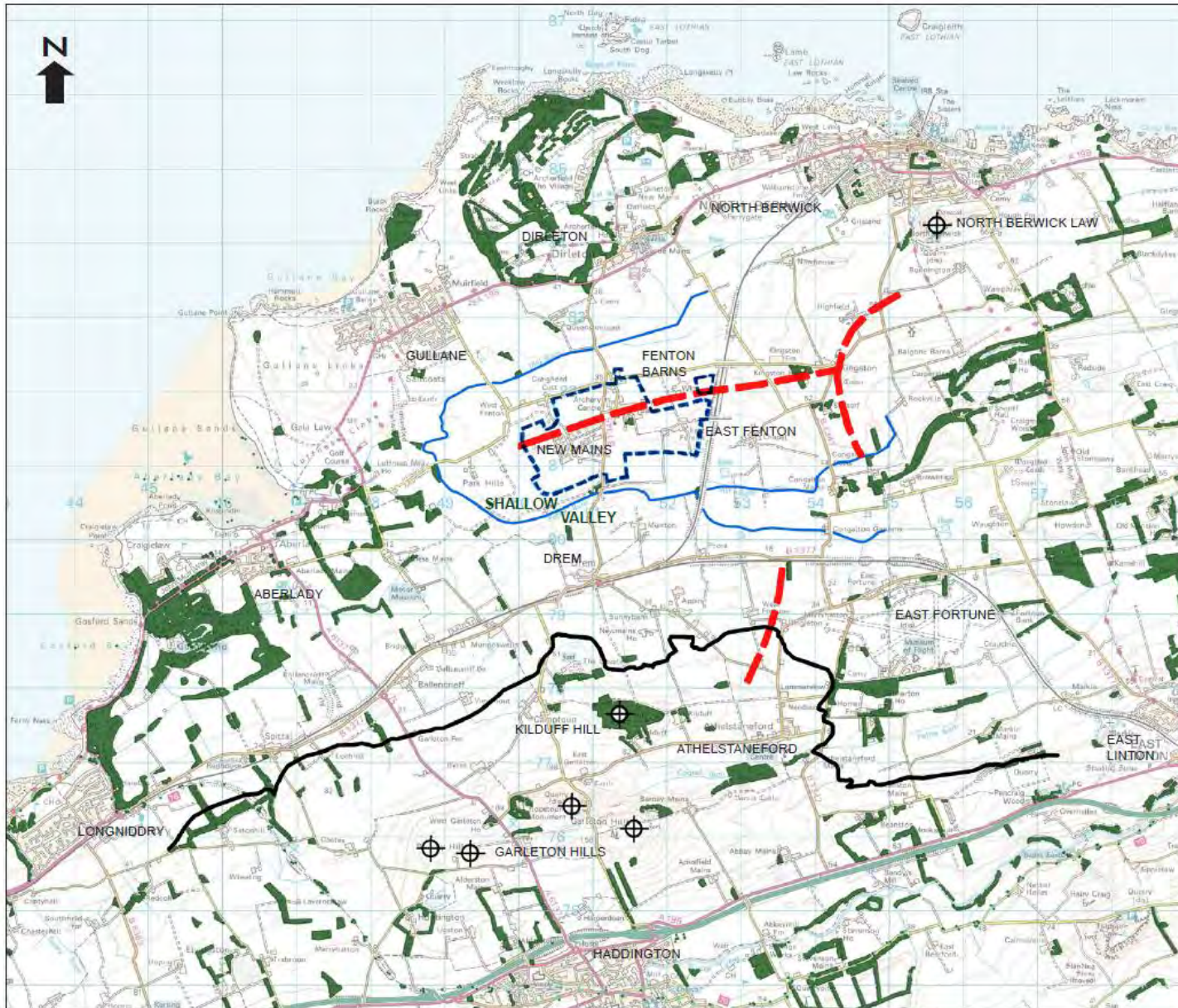
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FENTON BARNES







FIGURE 1

EXISTING SETTLEMENT PATTERN
(STRATEGIC) -
"NORTH BERWICK CLUSTER"

Scale: 1:50,000 @ A3 Date: October 2016



LEGEND

-  LOCALLY SIGNIFICANT RIDGE LINES
-  SIGNIFICANT TREE COVER / WOODLAND (INDICATIVE)
-  PEFFER / MILL BURN
-  50m CONTOUR INDICATIVELY DEFINING THE EDGE OF THE GARLETON HILLS LANDSCAPE CHARACTER AREA
-  HIGH POINTS (100m +)
-  THE SITE (SCHEMATIC)

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FENTON BARNES

FIGURE 2

STRATEGIC LANDSCAPE CONTEXT

Scale: 1:50,000 @ A3 Date: October 2016

Landscape Designations

Whilst it is acknowledged that the North Berwick Plain LCA benefits from a broad range of high quality landscapes with appropriate national and local designations designed to protect their assets and in turn their settings, it is noted that the site and its immediate context does not benefit from any specific landscape designations. The site does however, include a small number of listed buildings and a scheduled ancient monument which will be the subject of more detailed assessments as the project unfolds to firstly, identify the key attributes of each designation and secondly, to determine how best to protect the key assets as part of a detailed master planning exercise. The site is located outwith the Drem Conservation Area to the south and the extent of land identified under Policy CH12: Development Affecting Conservation Areas as included in the East Lothian Proposed Local Development Plan 2016.

Landscape Capacity

East Lothian is a settled and managed landscape and the area covered by the North Berwick Plain LCA reflects these characteristics. From the coastal towns and villages in the north, stretching across the generally flat to undulating terrain the area displays a wide range of settlement forms. Many of these settlements have witnessed continual growth over the years based upon residential led development, in villages and towns like Aberlady and North Berwick in the north, Dunbar in the east and Haddington to the south.

Other settlements have seen other forms of investment and growth, including in new business and commerce as well as tourism and these include Fenton Barns which has become a focus for business and retail growth in recent years drawing in visitors from across the Lothians and beyond. The existing settlement has grown along the northern edge of a shallow valley and has extended up the slopes and across the top of a local ridgeline with views of the building forms visible from a number of locations to the south within the valley form, including from the B1377 to

the south near to Drem. Views of the established building group at Fenton Barns are also available from the north on the B1345 Dirleton Road.


Views from beyond the valley though will be limited due to a combination of factors and when these are available the views will often be filtered, screened by road side hedges and trees. However, it is acknowledged that, as the businesses at Fenton Barns have continued to grow and their draw to visitors has increased, this has become a landscape in transition as the setting is dominated by the building forms associated with the businesses and the movement of people to and from the area. In this context it is considered there is scope for further growth to be delivered at Fenton Barns focussed upon the existing and emerging settlement form. The site is well connected with the potential for improved access facilities associated with this plan to create a new Planned Scottish Settlement. The landscape has the potential capacity to accommodate this scale and form of development as through careful planning the new development would be seen in the context of the existing extensive settlement form, expanding out from an established core and following the profile of the shallow valley of the Peffer/Mill Burn with its east-west axis.

New development would be seen in the context of an already established settlement form which includes residential areas set out around the edge of the business and retail core. Reference would need to be taken from the wider landscape context to ensure the new development knits into the landscape. In this regard new structure planting would be designed to set the context to the development, adding to the landscape resource in this area and potentially creating a woodland and parkland setting to rival in time, other more historic features in the Landscape Character Area. This new planting would be introduced to help to 'soften' the elevation of the new built form when seen in local views but would not be designed to 'screen' the site. Rather the extended settlement form would need to be designed to take advantage of its setting and profile, outward looking with an appropriately designed interface with the countryside setting.

Out with the established core building group at Fenton Barns there are a number of smaller, mainly residential building groups as well as farmsteads which will need to be integrated into the masterplan to help reinforce the extended settlement's sense of place and its history. These include the building group at East Fenton as well as potentially West Fenton. The creation of an extended community at Fenton Barns will be seen to consolidate an existing dispersed settlement form. A focus will be given to the existing community with the new development effectively extending out across the lower slopes and into the valley with the overall form ultimately tailored by the constraints and opportunities that will be established across this land holding.



LEGEND

-  EXISTING SETTLEMENT EXTENTS
-  THE SITE (SCHEMATIC)

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FENTON BARN'S

FIGURE 3

PROPOSED SETTLEMENT PATTERN
(STRATEGIC)

Scale: 1:50,000 @ A3 Date: October 2016

Development Strategy

In planning for this extended community at Fenton Barns it is important to note how the existing settlement already fits into the wider settlement pattern as identified in Figures 1 and 3 (Existing Settlement Pattern - North Berwick Cluster and Proposed Settlement Pattern - North Berwick Cluster). There is a balance in East Lothian between towns, villages, mansion houses and farmsteads, as noted in the SNH Landscape Character Assessment, and their landscape settings with many communities established at locations that reflected a wider function in the region, including inland market towns and agriculture/mill based communities. These communities are all linked by a network of A, Band C class roads supported by rail services to North Berwick.

The opportunity to deliver an extended Planned Scottish Settlement at Fenton Barns draws upon these locational and accessibility advantages as well as, importantly, the fact that Fenton Barns already offers a nucleus of key functions and services to the wider community with a broad business base at its core. This reflects the growth of some of our more historic communities, built on the back of markets, Haddington for example, from which people were drawn in to help build on an area's success. The landscape around Fenton Barns is already in transition and offers scope for a planned settlement to emerge over time offering a broad community base with the potential for improved transport links to serve the wider area.

This transitional, increasingly urbanised landscape therefore, forms the focus for the potential to masterplan the consolidation of the settlement pattern in the area, bringing in new homes and community facilities as well as the potential for new business investment to create a new 'village' environment. A Development Framework Plan (DFP) (Figure 5) has been drawn up to help illustrate the potential of the area to accommodate a significant new population whilst allowing the established community to continue to grow to create a new living, working and leisure environment designed for the 21st Century and beyond.

The DFP has therefore, been designed to help illustrate the potential for growth in this area leading ultimately, if the Council are minded to support this, to the creation of an extended community of up to 5000 - 6000 homes. The DFP also illustrates how a masterplan for this extended community could be created building out from the established community focus and set out around an enhanced infrastructure framework. The new development could, subject to the completion of various detailed assessments and with the support of the authorities, build out around the main access road network that crosses the landscape, including the B1354 and the B1377, whilst taking advantage of, in the short term, the established railway station at Drem.

Drem however, with its Conservation Area status would not be the focus of the new development strategy but rather this would be planned around Fenton Barns itself extending out essentially to the east and west along the valley to develop a settlement pattern consistent with other established and historic settlements in the area, including Gullane, Aberlady and Longniddry.

In Masterplanning for such a scale of development the DFP illustrates the potential to open up a new rail halt to serve the needs of the larger planned settlement form as the 'local' railway line serving communities up to North Berwick runs in a south-north direction from Drem to the east of Fenton Barns. In addition to this approach opportunities would need to be taken as necessary to improve the local road network to accommodate the scale of development envisaged for Fenton Barns however, with the existing railway station at Drem and the potential for a second rail halt at Fenton Barns it is considered that there is scope for a real sustainable transport initiative to be applied to this proposed development opportunity fully in keeping with both National and Local Government Policy.

In planning for a phased development at Fenton Barns there is also real scope to provide for a new landscape framework into which the new development would be sited. In this regard the DFP illustrates how extensive areas of new structure planting could be initiated at all stages in the process to allow the new development to be seen within a woodland landscape context. It is not envisaged that this would lead to a 'screening' of the new building forms but rather, the new structural woodland framework would be seen to 'soften' the overall development form whilst offering a framework for the creation of a broad Green Infrastructure network including a range of leisure and recreational facilities. This could also include the setting for a new secondary school campus which, through careful planning, could offer facilities to the wider community of this part of East Lothian.

The new development will be planned in detail at a future stage but the approach taken to date envisages a consolidated village centre with the settlement extending out from this core area with all new development and infrastructure planned to promote Government Policy in the form of Designing Streets. A broad range of homes can be provided with the design and finishes to the development controlled by a settlement wide Design Code which could come forward as part of the Masterplanning process. This would lead to the delivery of a high quality and desirable community reflecting the characteristics of many of the established historic communities across East Lothian.





LEGEND

-  EXISTING SETTLEMENT
-  RAILWAY LINE
-  RAILWAY STATION
-  DEVELOPMENT PARCELS INCLUDING RESIDENTIAL AND ASSOCIATED LAND USES
-  VILLAGE CENTRE DEVELOPMENT
-  ROADS
-  PATHS / CYCLEWAYS
-  VILLAGE SQUARE
-  GATEWAY FEATURES
-  TREES / WOODLAND
-  OPEN GREEN SPACE
-  DREM CONSERVATION AREA

- NOTE: VILLAGE CENTRE BROAD RANGE OF LAND USES:**
- RETAIL
 - LEISURE
 - BUSINESS
 - HEALTH CARE
 - RESIDENTIAL
 - PRIMARY SCHOOL
 - NEW SECONDARY SCHOOL

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FENTON BARNS

FIGURE 5

PROPOSED DEVELOPMENT FRAMEWORK PLAN

Scale: 1:12,500 @ A3 Date: October 2016

4. Transport and Access

Dougall Baillie Associates undertook a detailed 'Site Feasibility Study' in September 2016 to inform this section of the report. The key findings of their assessments have been summarised below.

Development Access Strategy

Vehicular Access

Gateway junctions on the B1345 would establish the transition from rural to urban / village road layout physically limiting vehicle speeds while enabling development on both sides of the B1345.

Walking & Cycling Accessibility

Walking trips are likely to be confined within the development site. While Drem Station is approximately 1.6km to the south of the development site, the B1345 does not incorporate footway provision between Fenton Barns and Drem. However there may be scope to accommodate this within the existing road verge to Drem.

The existing minor rural roads are suitable for use by commuting and leisure cyclists. Signage and route improvements would meet additional demand created by the development site.

Bus Services

The B1345 is an existing bus route. Because of development, a step change in bus service provision would be required. In discussion with local operators, frequent commuter services to Drem Station, throughout East Lothian and potentially onwards to Edinburgh would be established to meet anticipated levels of demand.

Rail Network

Travel by rail has an important role to play in minimising the impact of the Development on the local and trunk road networks. During the early phases of development, linking the Development to Drem Station would be important measures in minimising car trips and mitigating traffic impact.

At the higher end of development scale, if viable, it may be beneficial to relocate Drem Station onto the North Berwick Branch Line. A relocated Fenton Barns Station could have a significant impact in minimising development traffic generation while providing increased Park and Ride supply serving the wider area. The relocation of Drem Station could have the additional benefit of freeing up capacity on the East Coast Main Line (ECML).

Road Network Impact

In considering the Drem / Fenton Barns Area of Search East Lothian Council have noted *'The local road network may require some improvements; connections to the A1 are relatively poor for a development of a significant scale. There may be cumulative impacts on the A1, particularly Bankton junction.'*

Development Trip Distribution

Due to the relatively low level of jobs in East Lothian, 48% of East Lothian's employed residents work outside of East Lothian. The East Lothian Economic Development Strategy for 2012 to 2022, produced by the University of Glasgow, noted that of East Lothian's employed residents: 52% work in East Lothian, 40% work in Edinburgh and 5% work in Midlothian or West Lothian. Given this it can be assumed that a significant proportion of vehicle generated by the Development would travel to and from the west and in doing so would seek to use the A1 west of Haddington.

It can be expected that Bankton Junction will experience capacity issues because of the committed Blindwells development and other development in the area. Given the location of Fenton Barns, it can be anticipated that traffic travelling to and from the A1 (west) would seek alternative routes to avoid delay.

There are 3 alternative access points onto the A1 from the development site, these being the Abbotsview and Oak Tree Junctions at Haddington and the Gladsmuir Junction, that will be attractive and feasible for trips to and from Fenton Barns.

It can be anticipated that as traffic flows and delays increase along the B1377 / A198 route, particularly on the approaches to Bankton Junction, traffic will divert to use these alternative access points onto the A1. It could be anticipated that the routes following the A6137 to the south of Ballencrieff and the B6363 to the south of Longniddry would be used by significant proportions of development traffic. In the case of the larger development scenarios the use of the above routes is likely to require local upgrades to road geometry.

Development Constraints – Transport

Preliminary discussions with the Council indicate that, as a consequence of the lower scale development (<1000 units) at Fenton Barns, they would seek a capacity assessment, and impact mitigation where necessary, to demonstrate the ability of the road network to accommodate development trip generation at the following points on the road network:

- Bankton Junction;
- A198 / B1361 Meadowmill Roundabout;
- A198 bridge crossing the ECML at Meadowmill

Of the above, any improvement of the A198 bridge crossing would be constrained by the presence of the ECML. Given the limited traffic generation of the lower scale

development proposal, there is potential that the improvements associated with the Blindwells development could accommodate this level of additional demand.

With regard to larger development scenarios at Fenton Barns, the Council have noted that they would seek a capacity assessment, and impact mitigation where necessary, to demonstrate the ability of the road network to accommodate development trip generation at the following points:

- Link capacity and route suitability of the B1345;
- Link capacity and route suitability of the B1377;
- Dolphingstone Interchange;
- Salters Road Interchange.

Discussions with JMP as technical advisors to Transport Scotland have noted that they would seek clarification on the impact of any development within East Lothian on:

- A1 west of Wallyford,
- Old Craighall Interchange.

In addition to the above, it is anticipated that, depending on the scale of development, assessment of the following points on the road network would be required:

- B1345 / A198 priority junction at Dirleton (2000+ units);
- B1345 / B1377 priority junction at Drem (all scenarios);
- B1377 / A6137 roundabout (all scenarios);
- A6137 / A199 roundabout at Haddington (2000+ units);
- B1377 / A198 roundabout at Longniddry (all scenarios);

Figure 6 over, illustrates the potential locations of transport network interventions required to address the consequences of the development proposals. The nature of any interventions required would be dependent on the scale and phasing of development.



Figure 6: Transport Network Overview

5. Ground Conditions

Historic Review and Sources of Contamination

A brief review of available historical maps indicates that the land under consideration has generally been arable land with no appreciable development. There are some industrial buildings within the central portion of the site which, although not part of any future development, will require consideration. The following are noted:

- A gasometer in the east of the site, which was evident from historic mapping from 1892 to 1908. This gasometer is no longer evident on the site, but localized contamination could be present.
- A disused airfield in the south west c.1968-1980.
- An unspecified depot in the south west since c.1968.
- Several current industrial/commercial units (including several garages) throughout.
- Several unspecified tanks throughout since c.1968.
- A current fuel distributor and supplier in the south.
- Additionally, past and current land uses of moderate concern have been identified at the study site.

The presence of a disused quarry which was utilised as a landfill site outwith the site to the east is noted.

It is considered that none of these issues would result in a significant barrier to development, however a detailed site investigation would be required when further developing the proposals.

Anticipated Ground Conditions

Superficial deposits shown to be glacial till, which overlies solid geology, which is shown to be igneous lavas.

Anticipated Foundation Solutions

Superficial deposits are shown to be glacial till. It is anticipated that foundations would be normal founds, depending on any previous developments and subject to earthworks profiling.

Mineral Stability and Radon

The Coal Authority has advised that there are no details of historic coal mine workings within the proposed development area, while the e site is not within a radon affected area.

6. Flooding

Existing Hydrological Regime

The development site falls within the natural drainage catchment of two watercourses, these being Mill Burn and Peffer Burn.

The Mill Burn raises some 4km north east of the site, to the south east of North Berwick, from a series of land drains which drain the higher ground to the south. The watercourse flows in a general south westerly direction, picking up a number of tributaries along the way, towards the proposed development site predominantly in open channel, however there are a number of culverted section to facilitate road and railway crossings. The Mill Burn, at its closest point, is some 350m north of the site boundary at Cudgel House Bridge. The watercourse continues to flow in a general south westerly direction ultimately discharging to the Peffer Burn.

The Peffer Burn raises some 4.5km south east at a small pond and reservoir at East Fortune Small holdings. The watercourse flows in a general westerly direction picking up a number of small tributaries and a major tributary also known as Mill Burn, however is unrelated to the previously mentioned Mill Burn north of the development site. The watercourse flows in open channel with the exception of culverted railway and road crossings. The Peffer Burn, at its closest point, is located some 300m south of the proposed site. The watercourse continues to flow west before its confluence with the Mill Burn joining from the north west. From here the Peffer Burn continues to flow west before discharging to the Firth of Forth at Aberlady Bay.

Sources of Flood Risk

Current best practice recommends and planning advice requires that all new developments should be free from significant flood risk from any source and should not materially increase the probability of flooding elsewhere. For the purposes of this report existing flood risk has been considered from the following sources –

Coastal Flooding

A review of the SEPA flood maps (Figure 7) notes that the site is not considered to be at risk of coastal flooding. A further review of OS mapping notes the site to be approximately 3km inland from the extents of the Peffer Burn affected by the tide, in addition the site is in excess of an elevation of 15mAOD. It is concluded that the site is not at risk of coastal flooding.

Fluvial Flooding

Fluvial flooding arises when the capacities of river channels are exceeded due to high flows resulting in inundation of adjacent floodplains. The source of fluvial flooding to the development are the previously mentioned Mill Burn north of the site and Peffer Burn South of the site. A review of the SEPA flood notes the site not to be at risk of fluvial flooding from either of these watercourses.

Available OS information notes the Mill Burn to be at a level of less than 25mAOD at Cudgel House Bridge and levels along the northern site boundary are circa 35mAOD. It is considered, given the plan distance (350m), and vertical separation (10m) that the site is not at risk of flooding from the Mill Burn.

Available OS information notes that the Peffer Burn, as it flows past the southern site boundary, to be at a level of 10mAOD, with levels along the southern site boundary in the region of 15mAOD, it is considered given the plan distance (300m) and vertical separation (~5m) that the site is not at risk of flooding from Peffer Burn.

Pluvial Flooding and Overland Flows

Pluvial flooding arises from rainfall generated overland flow prior to the overland flow being intercepted by a watercourse, sewer or other drainage network. OS information notes there to be a ridge running through the site with land falling north and south towards the Mill Burn and Peffer Burn respectively. A local topographic high point is located beyond the western site boundary, there is a small catchment which would naturally shed runoff towards and through the development before reaching the watercourses. As such, any future development should consider the risk of runoff from the higher ground and provide sufficient mitigation measures to intercept runoff and divert flows around the development discharging to the same pre-development receiving watercourse.



Figure 7: SEPA Flood Map

7. Topography

Fenton Barns is located on a gentle slope of a hillock which falls from the east of the village towards the west, north and south (see Figure 8). The high point, to the east, is at an elevation of approximately 45m. It is anticipated that the proposed development will extend, approximately, to the 30m contour to the north, 20m contour to the west and 15m contour to the south. As such, development could be progressed with minimal regrading work.

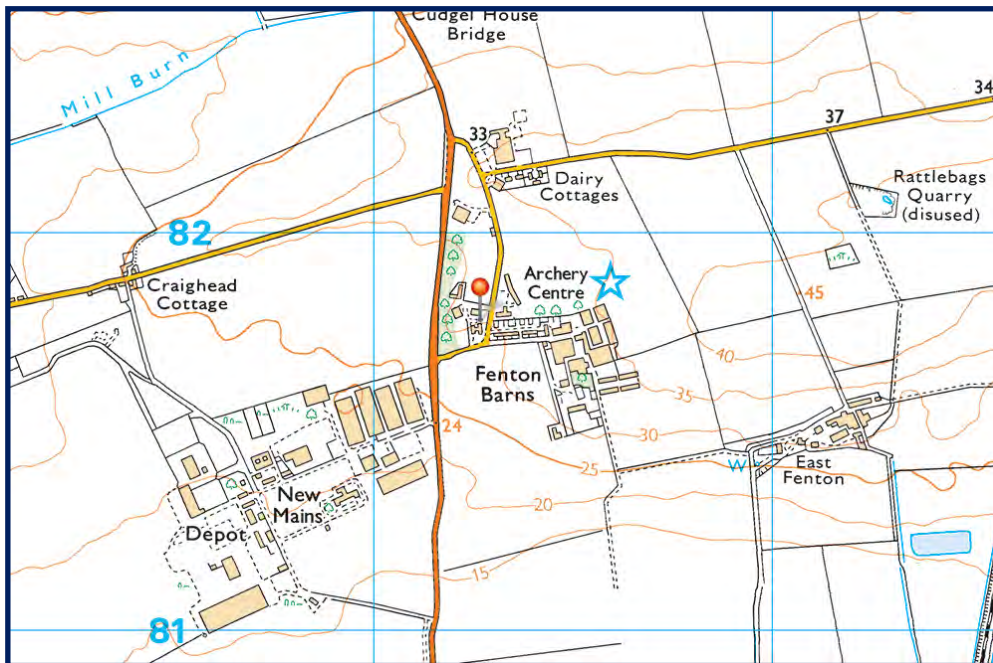


Figure 8: Topography Plan

8. Drainage

Existing Drainage

Foul and Surface water from Fenton Barns currently discharges into Peffer Burn, following treatment provided by a small privately maintained waste-water treatment plant, located adjacent to Peffer Burn, 1km south of Fenton Barns (Figure 9). The current sewerage treatment works, installed in 1940, is said to be unable to cope with demand and consequently a number of pollution incidents have occurred in recent years.

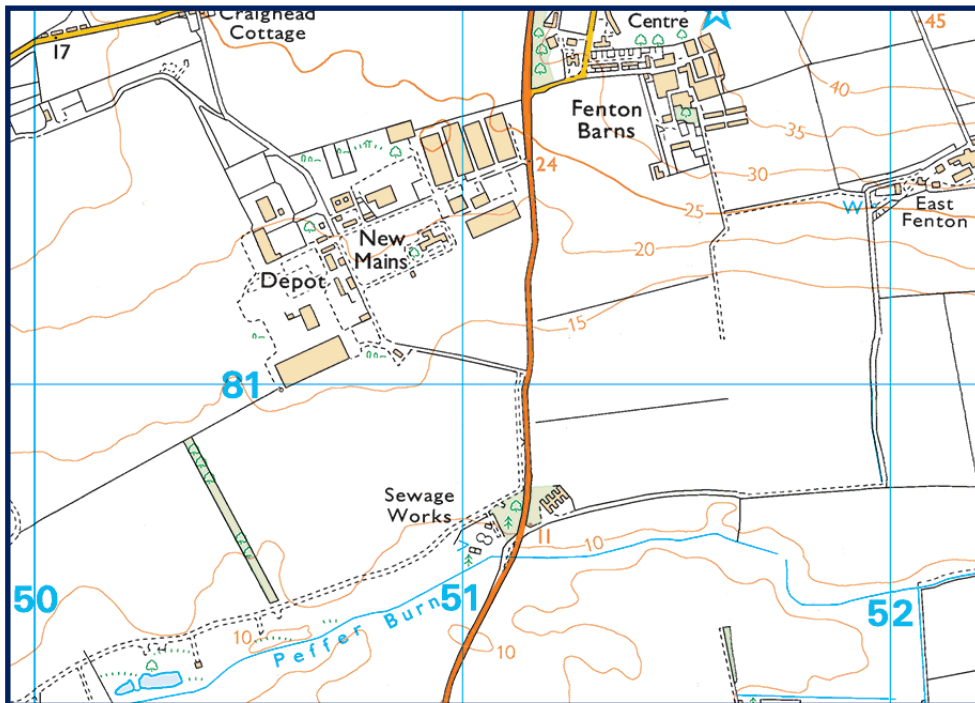


Figure 9: Location of Existing Waste Water Treatment Works

Due to the combined nature of the drainage network, surface water enters the waste water treatment works prior to discharge into Peffer Burn. Combined Systems are not desirable as extreme rainfall events result in overloading of the water treatment works, resulting in pollution instances within Peffer Burn and Aberlady Bay.

Proposed Foul Drainage

The existing Treatment works would not have capacity for any additional foul flows from Fenton Barns and upgrade would not be possible as it is anticipated that Peffer Burn, at this location, would not have sufficient dilution for the scale of the development.

It is therefore anticipated that any new development, whether 1,000 houses, or up to 5,000 houses, would require the construction of a new drainage system for Fenton Barns, improving the existing situation and separating the existing foul flows, where practicable, to discharge to a foul pumping station, probably located on the site of the existing Waste Water Treatment works. From this location, the effluent would be pumped to either Gullane Waste Water Treatment Works or North Berwick WWTW.

Discussions have been held with Scottish Water and their preferred solution would be North Berwick Waste Water Treatment Works, as this WWTW is planned to be renewed in the near future. Further discussions would have to be held with Scottish Water to ensure that the upgrade capacity includes the proposed Fenton Barns contribution.

Surface Water Drainage

It is anticipated that the development will provide a separate drainage system for the new development, which would separate the existing combined system where possible. The system would be designed in accordance with C753 – The SUDS Manual, East Lothian Council guidance and Sewer for Scotland 3. It is anticipated that this would include ponds for treatment and attenuation of surface water prior to discharge into the existing watercourses of Peffer Burn, to the south, and Mill Burn, to the north.

The design would have to embrace the principles of SUDS and would therefore have to allocate sufficient land within the development masterplan to provide SUDS facilities commensurate with the scale of development.

9. Services Infrastructure

Scottish Water - Drinking Water Supply

A Scottish Water Capacity Search confirmed that there is capacity in Castle Moffat Water Treatment Works for greater than 2000 properties. Should the development exceed this capacity then it is possible that upgrade works would be required to the Water Treatment works. A Water Impact Assessment will have to be undertaken to assess if, and when, the local network would have to be upgraded to convey the water from Castle Moffat WTW to Fenton Barns.

Scottish Power Energy Networks – Electricity

There are a several options for the supply of electricity to the site, the most appropriate solution is dependent on development phasing:

Option 1 – 5,000 Units

- The full 12MVA load, to serve 5,000 houses would require the construction of a new Primary Substation. Scottish Power would supply this from a 33kV connection to be agreed with Scottish Power. This connection would be available following SP's upgrade works which are due to be completed in 2017.
- A new sub-station network would be required in Fenton Barns.
- The cable route from Dunbar would be approximately 23km.

Option 2 - 2,500 houses

- Scottish Power has advised that an 11kV connection can be taken from the existing North Berwick Primary Sub-station. This connection would be available following SP's upgrade works which are due to be completed in 2017.
- Secondary sub-station(s) would be required at Fenton Barns.

Option 3 - 500 houses

- Scottish Power has advised that 500 houses could be supplied from the existing HV network surrounding the proposed development.

Electricity Diversion Works

Existing 11kV / LV cable assets appear to cross the development footprint throughout the proposed site. Rather than be abandoned, it is anticipated that this/these asset(s) may require to be relocated/diverted to retain the existing network configuration arrangements.

Scotia Gas Networks – Gas

Gas Proposed:

- A medium and low pressure network would be installed for the development, with gas supplied from North Site Boundary and the installation of the gas governor.
- New gas governors would be required within the development.

Gas Diversion:

The proposed development footprint appears to be clear of host GT gas assets. As such, no abandonment/diversionary works would be required. The development layout would have to take cognisance of the alignment of GTC's gas main which follows the site boundary.

Telecommunications – BT

BT currently supplies Fenton Barns by overhead lines. It is anticipated that they will reinforce this overhead network to supply the development, then supply the development by underground duct / cable network. It is anticipated that these costs would be borne by BT.

Telecommunications – Cable

There are currently no cable operators within the Gullane, Fenton, North Berwick areas. It is therefore assumed that telecommunications requirements will be met BT.

10. Cultural Heritage

GUARD Archaeology Limited undertook an archaeological desk-based assessment of a proposed development area at Fenton Barns in East Lothian. The aims of the assessment considered evidence for the past human use of the development plot, its archaeological sensitivity and the potential impact of the development upon the archaeological resource.

The assessment found that there were a number of cultural heritage sites identified within the proposed Fenton Barns development area. Scheduled Monuments and Listed Buildings have statutory designation and are subject to additional considerations within the planning process. The Scheduled Monument is of national significance, and the Listed Buildings are of local or regional significance. The remaining cultural heritage sites within the proposed development area are of lesser or unknown significance.

A limited number of cultural heritage sites are located within 100 m of the proposed Fenton Barns development area, including a number of Listed Buildings. The remaining cultural heritage assets are of lesser significance.

National planning policy has caveats and/or criteria that require to be met for any development that would affect Scheduled Monuments. As illustrated within the DFP (Figure 5), the design of the new settlement at Fenton Barns has been sensitively prepared to ensure the Scheduled Monument is located within the centre of the Village Green West, with an indicative 50 metre buffer to any built development.

National planning policy also gives additional protection to Listed Buildings and their settings. Development affecting a Listed Building must give special regard to the importance of preserving and enhancing the building, its setting and any features of special architectural or historic interest.

The proposed development area contains some prehistoric cultural heritage sites in the form of cropmarks that, by their nature, are of unknown cultural heritage significance. National and local planning policy stipulates that the preferred option for undesignated archaeological remains is preservation in situ but, where this is not possible, allows for preservation by record.

The detailed design and layout of a new settlement at Fenton Barns would be highly sensitive to the setting of the cultural heritage sites which have been identified and the future masterplan will consider all policy requirements to ensure the new development is sited appropriately within the existing surrounding context.

As such, any future planning application would include the following:

- an Environmental Impact Assessment of the effects of the proposed Fenton Barns development upon New Mains Scheduled Monument;
- an Environmental Impact Assessment of the effects of the proposed Fenton Barns development upon Listed Buildings within the development area and on the settings the Listed Buildings located within 100 m of the development area;
- a programme of archaeological works in order to preserve by record the prehistoric sites that are located within the proposed development area, and
- a programme of archaeological works in order to demonstrate the presence, or not, of any other significant archaeological remains within those parts of the proposed development area that will be subject to ground-breaking works in advance of any planning application submissions.

11. Ecology

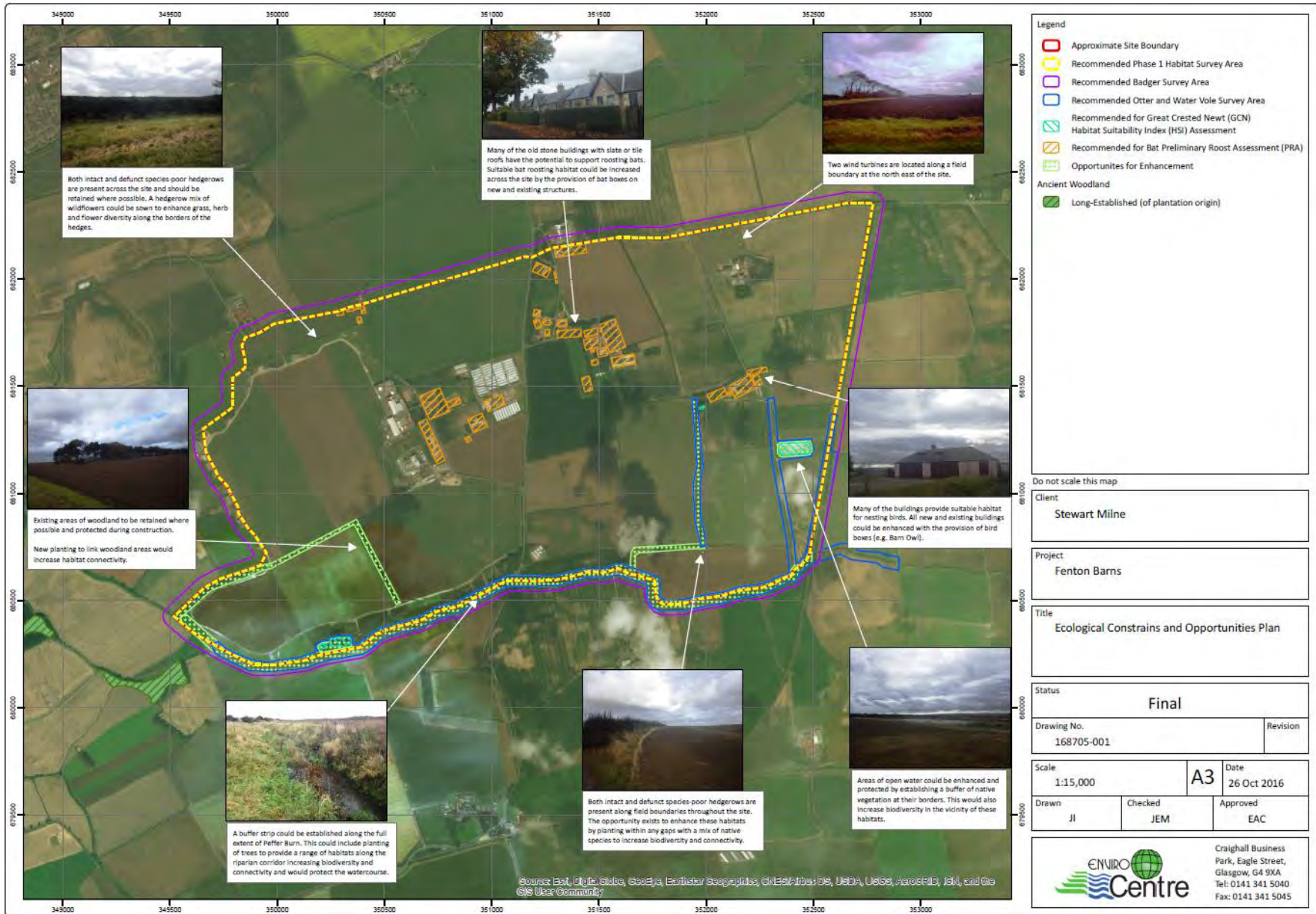
A site visit was undertaken by EnviroCentre in October 2016 to inform the production of an Ecological Constraints and Opportunities Plan (ECOP) for the land surrounding Fenton Barns. An ECOP is a useful tool/drawing that may be used to present ecological information to other professionals and can assist with gaining the best outcomes for biodiversity. The ECOP is included below.

A detailed desk study to identify designated sites and potential ecological sensitivities within the site and its environs was undertaken. A search radius of 2km was applied for ancient woodland and 5km for designated sites as appropriate to the size of the development.

The desk study and site visit undertaken, suggest that there do not appear to be any significant constraints to the development of a new settlement in this location. Table 1 below provides a summary of the recommended surveys to be undertaken as part of the masterplanning and planning process moving forward.

Table 1 : Summary of Recommendations

Item	Timescale
Phase 1 Habitat Survey of the site	Optimal survey period extends from May to September
Badger survey of the site plus a 50m buffer	Badger surveys can be undertaken year-round
Bat Preliminary Roost Assessment (PRA) of all buildings and trees within the site boundary and a general scoping assessment of the foraging and commuting habitats available to bats across the site.	PRAs and scoping assessments can be undertaken at any time of year. If required, bat activity surveys would need to be undertaken between May and August (inclusive).
Otter and water vole survey of the watercourse adjacent to the site boundary plus 250m up and downstream from the site extents.	Optimal survey period for water vole extends from March to October. Otter surveys are limited by vegetation cover rather than seasonality.
Great crested newt 'Habitat Suitability Index' (HSI) of the ponds present within the site boundary	Optimal time for completion of HSI is April to October and will inform the requirement for further targeted surveys
It is likely that due to the presence of suitable habitat and the close proximity of the Firth of Forth Ramsar, SPA and SSSI, it is likely that wintering bird surveys will be required as a minimum.	The scope and timings of the surveys would be designed at a later stage in the development in agreement with SNH.



12. Education Provision

Introduction

This section assesses the impact of the proposals on education provision in the surrounding area. Research has been carried out on the current education provision, with reference made to Proposed Plan and the accompanying Technical Note 14.

Current Education Provision

The new proposed settlement would lie in both the catchment area of Dirleton Primary School and Gullane Primary School. These schools consist of the Non-Denominational Primary Provision, with no denomination primary provision in the immediate area to While there are some small housing developments in the catchment area Technical Note 14 of 30 August 2016 to the Proposed Local Development Plan indicates that the capacity will not be breached as a result of the proposed housing developments. At Dirleton Primary School the peak projected roll is 99 in 2022.

Gullane Primary School is larger than Dirleton Primary School with a roll of 222 (August 2015 and a capacity of 238). There are proposed housing developments in the catchment area and Technical Note 14 indicates that the capacity will be breached in 2018 with a projected roll of 243. The peak projected roll is 292 by 2023. Technical Note 14 indicates that, in order to meet planned housing in the catchment area, the school will be extended by adding 2 classrooms, 1 General Purpose Room and a PE Hall, along with nursery provision. This would increase the capacity to around 288 and would deal with the expected increase from the housing already approved.

In terms of Non-Denominational Secondary Provision, the zoned secondary school for Dirleton and Gullane Primary Schools is North Berwick High School. The roll of

the school was 894 (August 2015) with a capacity of 950 pupil. There are already a number of housing developments proposed within the catchment area and Technical Note 14 indicates that the capacity will be breached in 2020 with a projected roll of 957. The peak projected roll of 1051 is reached by 2028. The Local Development Plan indicates that an expansion of North Berwick High School is committed to accommodate sites allocated by the previous Plan and further extension of the school is envisaged.

Impact of Proposed Development on Education Provision

Table 2 below shows the pupil projections, using the relevant ratios, for the proposed range in the total number of units:

Table 2 – Projected Pupil Numbers

Provision	3700 Units	5000 Units	6000 Units
Primary Non-Denominational	1243	1680	2016
Primary Denominational	74	100	120
Combined Primary	1317	1780	2136
Secondary Non-Denominational	592	800	960

None of these projections could be completely contained within the existing provision at Dirleton and Gullane Primary Schools given the very limited surplus capacity at Dirleton Primary School and the non-existent surplus capacity at Gullane Primary School.

East Lothian currently has a significant range in size of primary schools – in session 2015/2016 from 19 to 931. Given the projections in the table above the Council reaction at the various projected housing units would probably be as follows:

- 3700 units probably 2 new non-denominational primary schools;
- 5000 units probably 2 new non-denominational primary schools;
- 6000 units possibly 2 non-denominational primary schools but more possibly 3, or alternatively it could also be 2 non-denominational primary schools and a joint campus non-denominational and denominational school.

In the earlier stages of the development there are two possibilities to create additional capacity at Gullane:

1. Build a further extension at Gullane.
2. Provide temporary units until the point at which a new primary school would be provided at Fenton Barns.

In terms of secondary provision, the scale of the projected rolls for the development is such that they could not be contained within North Berwick High School even if extended given the housing already approved. A new secondary school would be required. A further possibility to be considered is whether part of the provision might be made as a primary/secondary joint campus to reduce part of the capital costs.

Phasing

Clearly the proposed Fenton Barns development would be phased although no definitive details of the possible phasing are yet available. Often phased developments can be dealt with educationally by the initial phase(s) using existing surplus capacity or temporary capacity created by providing temporary units and later phases being accommodated in new provision.

Based on an indicative phasing programme the possible dates for provision of primary education can be estimated. The required Non-Denominational Primary

schools would be provided in Year 4 and 17. This takes into account the possible scenario of providing temporary units at Gullane Primary School to increase the capacity by about 100.

Secondary Provision

As indicated above there is limited capacity in North Berwick High School to accommodate pupils from this development. It is considered from Years 1 to 5, when on average there is a very low number of associated pupils, that these pupils could be accommodated at North Berwick High School within temporary accommodation.

A further possibility in the scenario envisaged above with a re-zoning of North Berwick High School would be to transfer pupils who would live in the re-zoned catchment area from North Berwick High School in S1 to S3 to the new secondary school to join those from the new housing. Pupils in S4 to S6 would go to North Berwick High School in the capacity created by removing the S1/S3 pupils and then that provision would phase out as the S1/S3 pupils moved on to be joined by other pupils from the new housing.

From Year 8 onwards a new secondary school could be viable if the pupil output from Aberlady, Athelstaneford and Gullane were added to the pupil output from the new housing. Again it should be possible to consider a phased build of the secondary school. This would require a careful design solution allowing elements of the general and specialist accommodation to be at the core. A further option would be to use a wing of general classrooms as the first primary school and then move the primary pupils to a new primary school at a later date.

Conclusion

It is clear that a development on this scale will have some impact on education provision. Notwithstanding, pupils for both primary and secondary can be accommodated within existing schools or temporary accommodation in the early years of development, working towards provision of primary school in Year 4 and secondary in Year 8.

13. Conclusions

Stewart Milne's interest in the Proposed Plan relate to how the Council envisages the future housing land supply, in particular the opportunity to allocate up to the 6,000 houses envisaged in the area of search in the longer term.

The assessments undertaken to inform this DFR demonstrate that a new settlement can be feasibly accommodated in this location. Where impacts have been identified for the development, appropriate mitigation measures and solutions have been identified and would be undertaken as part of the future masterplanning and planning of the site. Overall, the new settlement at Fenton Barns will help address the need for additional housing in East Lothian over the coming years.

We therefore object to the non inclusion of land at Fenton Barns within the Proposed East Lothian Local Development Plan, and provide support in the form of this Development Framework Report for inclusion of the land surrounding the existing employment areas at Fenton Barns as a new settlement with capacity for up to 6,000 homes and appropriate commercial uses along with a policy to guide its future development through a master planning brief.

Notwithstanding, we support an initial allocation of the land to the west of Fenton Barns for a smaller first phase of residential development in the region of up to 1000 homes.



This document has been prepared by Savills (UK) Ltd.

Savills, Wemyss House, 8 Wemyss Place, Edinburgh, EH3 6DH

From: .
To: [Local Development Plan](#)
Cc: [Hubby](#)
Subject: Objection to proposed Gullane LDP
Date: 05 November 2016 14:37:56

Dear Sir/Madam,

We are writing to strongly oppose the proposed LDP for Gullane. Whilst we accept some development is necessary, we STRONGLY object to the scale of overdevelopment and believe this to be well beyond what is reasonable.

The cumulative impact on Gullane has not been adequately assessed and this will have many repercussions, including the following:

- negative impact on a rural road network
- lack of public transport facilities, particularly on the train network
- huge negative impact on medical and school facilities
- community facilities will not cope

Tourism provides a good income in East Lothian and this will affect the attractiveness and popularity of the area.

The cumulative effect of all 4 sites being developed in Gullane is deeply concerning and grossly unbalanced.

We request Saltcoats (NK7), Fenton Gait East (NK8) and Fenton Gait South (NK9) to be removed from the proposed LDP as sites for housing development.

We have already lodged written objections to the proposed Saltcoats and Fenton Gait East developments.

Yours sincerely,

Ben and Jenni Carter

From:
To: [Local Development Plan](#)
Cc: [Goodfellow, Jim](#); [Judith Priest](#)
Subject: Local development plan: proposal for development at land at Glebe Field to the south of Whitekirk (PROP OS5)
Date: 05 November 2016 15:34:42

Dear Sir

I received your notification regarding the update of the local development plan for Whitekirk With a great deal of difficulty – and largely because I have contacts in Dunpender Community Council I managed to get a copy of the plans
My comments are as follows

No consultation with the community has taken place regarding the proposals – I am very interested to understand how many people have been contacted for their views prior to publication

The Area outlined is disproportionate to any foreseeable need for hundreds of years (it appears to be about 3 times the existing graveyard)

And as the proposed site is currently greenfield, the development would not be in keeping with the village

From my point of view there are other fields closer to the church that could be considered.

Reading the benefits I find it difficult to see how this proposal could benefit Haddington which indicates that this proposal was prepared

More by Cut n Paste than by considered preparation of the document.

Finally I attempted to add my comments via the web site but this was far too difficult as the reference used in the notification

was not indexed or referenced within the website.

And the page numbers available on line were out of sync with the document copy I was given

I spoke to someone in the planning team who was very helpful who admitted that “it was not very easy on line”

I hope my comments can be used to improve this process

Regards
Eric Martin

6 November 2016

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

Dear Sir/Madam,

East Lothian Local Plan – 2016.

Members of the East Lothian Liberal Democrat Party have considered and discussed the East Lothian Local Plan.

I would now like to make a submission on behalf of the local Party please as per the attached document. I note that you would prefer submissions to be made through the Consultation Hub as this makes for easier analysis but given the generally high level nature of this submission, we have chosen to submit it as one document. I hope that this is not too great an inconvenience.

I would be happy to answer any questions that you might have about this submission or to discuss any of the points raised within it.

Yours faithfully,

Robert O’Riordan
Convenor
East Lothian Liberal Democrat Party

East Lothian Local Plan – 2016.

East Lothian Liberal Democrat Submission to Consultation

The overarching premise of this response is that we accept that there is a severe housing crisis in the United Kingdom, and in Scotland in particular, and that there is a shortage of housing for first time occupiers, both individuals and families.

We support Scottish Government initiatives to address this imbalance and note that the burden of the housing crisis falls on those with low to middling incomes, the very people most in need of government support in the current economic climate

We accept that East Lothian needs to take its share of new housing; we also accept that the scale of the new development is considerable in both absolute and relative terms and that there is a degree of urgency required to fulfill this requirement.

Consequently, we broadly accept the thrust of the 2016 Local Plan subject to the following provisos and comments.

- 1) We accept that, on the surface, it is logical that the bulk of development should take place in the west of the county given its proximity to Edinburgh, the source of considerable employment opportunity.
 - a) However, this does not take into account the fact that that transport links from Musselburgh and surrounding areas are currently inadequate (as witnessed by the frequency of commuter traffic at Musselburgh station with passengers unable to board already full trains). Development can only take place once adequate solutions have been found. We support the proposal to construct a four-line section of the East Coast mainline between Prestonpans and Drem but it is too tentatively addressed in the Plan and there is no mention of how it might be funded.

- b) Additionally, the nature of road links within Musselburgh (the River Esk is only bridged for traffic flow at two points below the A1) mean that congestion is already often severe in Musselburgh and additional development within the area will exacerbate this already considerable problem. Avoiding significant new development on sites where traffic would be channeled onto the High Street and instead concentrating on large developments at Wallyford and Craighall where there is good access onto the A1 would ease this challenge.
 - c) Consideration should be given within the local plan to the regeneration of Musselburgh High Street parallel to the development of new housing in the area. However, the creation of extra housing close to the centre of Musselburgh will create extra traffic resulting in additional congestion and air pollution.
 - d) We strongly object to the inclusion of Proposal MH13 (land at Howe Mire for 170 dwellings); this lies at the heart of the site of the Battle of Pinkie Cleugh which is of national significance. The site also lies within the major open lung east of the River Esk and, if developed, the new Green Belt boundary to its West and north would be indefensible and a whole swathe of land would be opened to potential development. This area is vitally important in terms of Musselburgh and Inveresk's identity and character.
- 2) The Plan generally does not seem to lay due emphasis on the impact of new development on existing local infrastructure including transport links and access as well as educational and medical facilities. Local communities have already expressed concern about these issues which we consider should be fully addressed as part of the Plan. It is imperative that communities are involved in the planning process and that they are won over; these are their communities and considerable ownership of the future shape of communities should lie in the hands of local people helped and guided by the East Lothian Planning Department. Currently many communities within East Lothian feel as if they are "put upon" by national and local government and developers and have little sway over planning matters. This is not how it should be.
- a) With particular reference to Dunbar, there are concerns about linkage between developments north and south of the East Coast mainline; consideration needs to be given to the creation or re-opening of underpass(es) or footbridges under/over the railway.
 - b) With particular reference to Gullane, priority should be given to developing the brownfield Fire School site before "greenfield" sites are developed as urged for by well supported GOOD (Gullane Opposes Over-Development) Campaign.

- 3) In broad terms the Plan lays emphasis on the proximity to Edinburgh as a source of employment. We think an approach whereby consideration is given to creating employment within East Lothian removing the need for commuting offers a dual benefit of boosting the local economy as well as reducing traffic over the already strained local and city based transport systems and roads. While East Lothian has already become to some extent a dormitory for Edinburgh, we believe there is a case for imaginative and creative solutions which seek to reverse this trend, including: finding ways to encourage employers to locate in East Lothian from Edinburgh; stimulating a culture of home working and establishing local office hubs and workshops. While many of those who are educated at primary and secondary level within the county will go further afield for continued education or to seek employment opportunities, it is highly desirable that employment opportunities, including for self-employment, are fostered within East Lothian giving those who wish to stay in the county the means to do so. Where possible developers should be encouraged to offer construction apprenticeships on a local basis.
- 4) We are unhappy with an apparent increasing tendency whereby local planning decisions are overruled by government appointed reporters. We believe the involvement of local communities in the development and planning process should be encouraged and supported by both local government and developers; currently we see that little more than lip service is paid to this important principle by both of these parties and central government too. The level of resourcing of public and private planning departments needs to take this consideration into account.
- 5) We are concerned that provision for social housing is often allocated to the periphery of developments rather than integrated within them.
- 6) We are concerned that the Scottish Government's allocations to East Lothian of funding for affordable housing will be completely inadequate to allow for take-up of the 25% of sites due to be set aside for this type of housing. Where it does not appear to be possible to fully use this allocation (even for alternatives to social-rented housing such as shared equity, etc.) would it not be possible to use the "commuted sums" mechanism to lever in more funding from developers to try and solve the infrastructure problems we have highlighted above?
- 7) We would like to see the Plan take into account the possibility of the Council making some provision to support groups wishing to build their own houses. Obtaining suitable sites is the main problem such groups face. It ought to be possible to set aside for this purpose a small proportion of the 25% site allocation for affordable housing.

- 8) We see a distinct need for a variety of housing styles including bungalows for those seeking to down-size and also for households which include family members with impaired mobility or other disabilities.
- 9) We suggest greater consideration is given to building standards and in particular to obligatory rigorous green/eco-friendly requirements.
- 10) We suggest that priority is given to restoring and bringing unoccupied and derelict housing or potential housing back into the market.
- 11) The scale of development outlined in the Plan will mean that many of the towns and villages in East Lothian will grow considerably in the coming five years. While this may be achievable in the current planning window, it should be noted that the scale of this development may not be possible in future five year plans. It is important that communities, notably those along the coast between Musselburgh and North Berwick remain separated and are not joined together to form one long built up ribbon spreading out from the city. Capacity for further development is limited here once and if the Plan under consideration is fulfilled. Similar issues exist in Dunbar where we strongly favour maintaining the distinct communities of Belhaven and West Barns; these should not be allowed to coalesce with, and become conjoined, to Dunbar.
- 12) The provision of single occupancy housing for all age groups is important and a need that is sometimes overlooked. It does not appear to be given any prominence within the Plan.

6 November 2016

From:
To: [Local Development Plan](#)
Subject: objection to the proposed Local Development Plan
Date: 05 November 2016 17:31:35

04/11/2016

Dear Sir/Madam,

I am sending this email to you to register my objection to East Lothian Council's proposed Local Development Plan (LDP). I have previously submitted objections to two planning applications from CALA Homes (Planning Applications 16/00594/PPM and 16/00587/PM) and I include copies of those objections with this email.

My strong objection to the proposed LDP is centred around what seems to be a massive scale of housing development planned for Gullane village and the cumulative and extremely damaging effect of that development on the inhabitants of the village.

I was deeply shocked to read in the LDP that East Lothian Planning have actually proposed to include a staggering total of 4 zones for housing development within Gullane – a single and small coastal village in East Lothian.

If this ill-advised proposal were to be confirmed, Gullane village would quite literally be overwhelmed and would cease to exist as it does at present. The cumulative effect of 4 new housing developments on the village is very difficult to imagine but I would argue that the following points give a reasonable view of the key impacts.

1. There would be a total of 344 new houses built, with the overwhelming majority of these NOT being affordable housing in any shape or form. The proposal to have all of these new homes built within Gullane would mean that the village would be contributing a total of 50% of ALL the new housing zones within the North Berwick coastal area. This cannot possibly be seen as taking a balanced approach to the spread of new housing development across all of the coastal area of the county.
2. The cumulative, adverse impact of such a scale of development on the local & rural road network has clearly not been properly assessed. There would be around an extra 600 vehicles driving on the roads. Gullane Main St already suffers from difficult and very limited parking as well as coping with heavy volumes of through traffic accompanied with persistent speeding through the village.

These current issues would be exacerbated with an additional 600 vehicles requiring daily access to shops, community facilities, the primary school and the health centre. We would have to contend with an extra 344 commuters driving in and out of the village daily or driving to access the nearby railway station at Drem where parking issues are already a serious and dangerous issue for residents and pedestrian traffic. The Drem link would be particularly dangerous for users of the C111 route towards West Fenton. This "road", known locally as a lane, has dangerous narrow bends, no footpath and is regularly used by walkers, pedal cyclists and horses. These vulnerable users would be in real danger from a huge increase in vehicle traffic, particularly from the largest site at Saltcoats Field.

3. The massive overstretching of scant local amenities. The village school and medical facilities would be seriously compromised given the projected increase in population. There is a projected increase of 382 school age children and a further 107 pre-school children requiring nursery placements. The village primary school would not be able to accommodate this level of demand. The village medical practice is already struggling to cover Gullane and the nearby communities of Dirleton and Aberlady. An already struggling practice could not be scaled up to meet the increased level of demand. There would be a similar outlook for community facilities like the Village Hall.

4. The actual scale of change and its' duration of development of at least 10 years cannot possibly be mitigated against and therefore would have a significant, adverse effect on tourism and

most fundamentally, on the very day to day life in the village itself.

5. The delivery of such a scale of development sites cannot be sustainable in the medium to long term as they will have poor access to employment and a range of expected services. They will therefore most certainly damage future opportunities for leisure and recreation in one of the region's most attractive locations.

In conclusion, I just cannot reconcile the proposed LDP from East Lothian Council including 4 zones of housing development within one East Lothian coastal village. I strongly urge and appeal to East Lothian Council to please look again at this again as it currently simply looks like very poor planning.

I would therefore request that three of the sites proposed for housing development (NK7 Saltcoats, NK8 Fenton Gait East and NK9 Fenton Gait South) are removed from the current version of the plan and that it retains the proposed brownfield development of 125 houses on the old Fire Training College site. That surely makes sense and does give a balanced view that a small village community like Gullane will accept taking on its' fair share of local housing development within the county.

Yours faithfully,
Mrs Anne Watson

24/08/2016

Planning Application No. 16/00594/PPM

Dear Sir/Madam,

I am writing to register my objection to the above Planning Application by CALA Homes.

My principle objection is subjective. Based on the latest census on population, Gullane is classed as a village. This proposal, alongside the other CALA Homes planning applications for our village, would increase the population to the size of a small town. Given other planning applications for housing in East Lothian's coastal villages, I strongly question the Council's policy. Is it their intention to obliterate most of our scenic, historical villages and replace them with homogenous towns?

I also wish to object on practical grounds to the development of Saltcoats field for the following reasons.

1. In spite of Scottish Planning Policy advocating that re-development of existing brownfield sites should take precedence over greenfield developments, the large scale CALA development proposal would be on prime agricultural land set in beautiful rural countryside. It would result in a massive over development of Gullane village and completely ruin the amenity of the Gullane Conservation Area.

2. I believe that approval of this CALA proposal would certainly compromise the delivery of the proposed brownfield development on the site of the old Fire College. It is far more financially attractive for a developer to develop a greenfield site than have to invest large sums of money on clearing a brownfield site for re-development. A likely outcome would be that Gullane would be facing the unpalatable prospect of a large derelict site sitting in the centre of the village for years to come.

3. CALA Homes' application anticipates that completion of the site would be by 2020. In my view, a more realistic timescale to complete all of the proposed greenfield development would be anything up to ten years. This would severely impact the basic day to day quality of life for the inhabitants of Gullane & West Fenton communities for a very long period of time and would have a detrimental effect on tourism to the local area.

4. Gullane village currently suffers from large volumes of local and through traffic coupled with narrow road lanes on the main street and very limited parking facilities. This CALA proposal would greatly exacerbate this situation as it will result in a substantial increase in road users which will, in turn, result in increased traffic levels, noise, pollution and an inevitable rise in pedestrian & cyclist safety issues.

5. As previously stated, Gullane is a village and NOT a town. It has very limited local facilities

which already struggle to match an increase in population in recent years. This CALA proposal would put an intolerable extra burden on these facilities resulting in major issues for our primary school, the village medical practice and our small community Village Hall.

6. The road between Gullane & West Fenton is known locally as a "lane" for good reason. It is narrow, has no pavement for most of its length and is regularly used by walkers, cyclists (mostly children), horse riders and some local traffic. This CALA proposal will introduce a large amount of road traffic from the proposed development onto this quiet country lane. In doing so, it will greatly increase the potential for road accidents and raise general safety concerns for pedestrians, horse riders and cyclists.

7. It is already acknowledged by Senior ScotRail Officials that the North Berwick to Edinburgh rail line currently has issues with passenger numbers and parking issues at all of its' stations. Public parking facilities at Drem & Longniddry railway stations do not cope currently with passenger demand. This CALA proposal would definitely increase the level of demand and thus cause considerable traffic & pedestrian safety issues at and around the two local stations.

8. I am deeply concerned over the delay in publication of the Local Development Plan (LDP). Surely the CALA application is premature as we have been informed that the new 10 year LDP will not be published until the end of September 2016. Any approval of the CALA proposal ahead of an agreed LDP must prejudice the LDP content and if so, will have a detrimental impact on the brownfield proposal for the Fire College site.

Finally, I consider that the proposed CALA development would be an extremely harmful one for the Gullane & West Fenton communities. It would result in a massive overdevelopment of Gullane, increasing its size by around 30%. Such an increase would overwhelm the small and limited village infrastructure and would certainly destroy the basic amenity & community life of the village. Also, if other Planning Applications are approved for more housing in our neighbouring villages, it will put further pressure on our amenities and roads because the population of these villages already use our local shops, Health Centre, Libraries etc.

I urge East Lothian Council (Planning) to reject the CALA proposal and I look forward to hearing from them following their decision on the Saltcoats Field planning application.

Yours faithfully,

Mrs Anne Watson

5/9/2016

Planning Application No. 16/00587/PM

Dear Sir/Madam,

I am writing to register my objection to the above Planning Application by CALA Homes.

My principle objection is subjective. Based on the latest census on population, Gullane is classed as a village. This proposal, alongside the other CALA Homes planning applications for our village, would increase the population to the size of a small town. Given other planning applications for housing in East Lothian's coastal villages, I strongly question the Council's policy. Is it their intention to obliterate most of our scenic, historical villages and replace them with homogenous towns?

I also wish to object on practical grounds to the development of Saltcoats field for the following reasons.

1. In spite of Scottish Planning Policy advocating that re-development of existing brownfield sites should take precedence over greenfield developments, the large scale CALA development proposal would be on prime agricultural land set in beautiful rural countryside. It would result in a massive over development of Gullane village and completely ruin the amenity of the Gullane Conservation Area.

2. I believe that approval of this CALA proposal would certainly compromise the delivery of the proposed brownfield development on the site of the old Fire College. It is far more financially attractive for a developer to develop a greenfield site than have to invest large sums of money on clearing a brownfield site for re-development. A likely outcome would be that Gullane would be facing the unpalatable prospect of a large derelict site sitting in the centre of the village for years to come.

3. CALA Homes' application anticipates that completion of the site would be by 2020. In my view, a more realistic timescale to complete all of the proposed greenfield development would be anything up to ten years. This would severely impact the basic day to day quality of life for the inhabitants of Gullane & West Fenton communities for a very long period of time and would have a detrimental effect on tourism to the local area.

4. Gullane village currently suffers from large volumes of local and through traffic coupled with narrow road lanes on the main street and very limited parking facilities. This CALA proposal would greatly exacerbate this situation as it will result in a substantial increase in road users which will, in turn, result in increased traffic levels, noise, pollution and an inevitable rise in pedestrian & cyclist safety issues.

5. As previously stated, Gullane is a village and NOT a town. It has very limited local facilities which already struggle to match an increase in population in recent years. This CALA proposal would put an intolerable extra burden on these facilities resulting in major issues for our primary school, the village medical practice and our small community Village Hall.

6. The road between Gullane & West Fenton is known locally as a "lane" for good reason. It is narrow, has no pavement for most of its length and is regularly used by walkers, cyclists (mostly children), horse riders and some local traffic. This CALA proposal will introduce a large amount of road traffic from the proposed development onto this quiet country lane. In doing so, it will greatly increase the potential for road accidents and raise general safety concerns for pedestrians, horse riders and cyclists.

7. It is already acknowledged by Senior ScotRail Officials that the North Berwick to Edinburgh rail line currently has issues with passenger numbers and parking issues at all of its' stations. Public parking facilities at Drem & Longniddry railway stations do not cope currently with passenger demand. This CALA proposal would definitely increase the level of demand and thus cause considerable traffic & pedestrian safety issues at and around the two local stations.

8. I am deeply concerned over the delay in publication of the Local Development Plan (LDP). Surely the CALA application is premature as we have been informed that the new 10 year LDP will not be published until the end of September 2016. Any approval of the CALA proposal ahead of an agreed LDP must prejudice the LDP content and if so, will have a detrimental impact on the brownfield proposal for the Fire College site.

Finally, I consider that the proposed CALA development would be an extremely harmful one for the Gullane & West Fenton communities. It would result in a massive overdevelopment of Gullane, increasing its size by around 30%. Such an increase would overwhelm the small and limited village infrastructure and would certainly destroy the basic amenity & community life of the village. Also, if other Planning Applications are approved for more housing in our neighbouring villages, it will put further pressure on our amenities and roads because the population of these villages already use our local shops, Health Centre, Libraries etc.

I urge East Lothian Council (Planning) to reject the CALA proposal and I look forward to hearing from them following their decision on the Saltcoats Field planning application.

Yours faithfully,

Mrs Anne Watson

From:
To: [Local Development Plan](#)
Subject: Objection to proposed Gullane LDP
Date: 05 November 2016 18:23:57

Dear Sir/Madam,

We are writing to strongly oppose the proposed LDP for Gullane. Whilst we accept some development is necessary, we STRONGLY object to the scale of overdevelopment and believe this to be well beyond what is reasonable.

The cumulative impact on Gullane has not been adequately assessed and this will have many repercussions, including the following:

- negative impact on a rural road network
- lack of public transport facilities, particularly on the train network
- huge negative impact on medical and school facilities
- community facilities will not cope

Tourism provides a good income in East Lothian and this will affect the attractiveness and popularity of the area.

The cumulative effect of all 4 sites being developed in Gullane is deeply concerning and grossly unbalanced.

We request Saltcoats (NK7), Fenton Gait East (NK8) and Fenton Gait South (NK9) to be removed from the proposed LDP as sites for housing development.

We have already lodged written objections to the proposed Saltcoats and Fenton Gait East developments.

Yours sincerely,

Jenny and Stefan Gries

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-05 18:17:54**

About You

1 What is your name?

First name:

David

Surname:

Howel

2 What is your email address?

Email address:

info@clarendonpd.co.uk

3 Postal Address

Address:

Clarendon
5a Castle Terrace
Edinburgh

4 Please enter your postcode

Postcode:

EH1 2DP

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

Developer/ agent/ landowner

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

Organisation:

Clarendon

Your role:

Consultant for The Esperance Trust

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

Section 2d - Tranent Cluster Strategy Map (pg 31)

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

Modifications(s) Sought:

Addition of proposed housing site at Hillview Road, Ormiston (ref.MIR/TT/HSG132), as detailed below.

Amendment to proposed Countryside Around Towns designation at south-east Ormiston, as detailed below.

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

Justification for Modification(s):

Introduction

This representation to the East Lothian Proposed Local Development Plan (LDP) has been prepared by Clarendon Planning & Development Ltd on behalf of The

Esperance Trust.

The representation objects to the non-inclusion of land at Hillview Road, Ormiston as a (specialist) residential development site.

It is considered that the site presents a small-scale, effective housing site which can contribute towards East Lothian's 5 year supply of effective housing land and, in particular, the need for specialist retirement housing to complement existing mainstream housing proposals in the village.

In this regard, discussions have taken place between the landowner and Places for People, an established Registered Social Landlord, who would act as developer of the proposed retirement properties. Alternatively, an agreed governance structure would be put in place by the landowner to allow for funding via the Rural Housing Fund for part or all of the site.

Proposed Site

The site extends to approximately 2.4 hectares (6 acres) and sits on the south-eastern edge of Ormiston, bound by established housing to north and west, tree planting on the southern edge with an opportunity to create a new landscaped edge to east. The site boundary is indicated on Figure 1 of the supporting document (emailed).

The site previously formed part of a wider agricultural landholding which is now in separate legal ownership and therefore, the proposed site is not a viable agricultural enterprise in its own right.

The opportunity is based upon a small-scale, high quality landscaped approach to create a suitably scaled extension to accommodate a specific housing need in the area.

The site capacity will be determined by the agreed form and type of housing units and associated landscaping requirements, in conjunction with the potential RSL partner and East Lothian Council.

Proposed Use

LDP Paragraph 3.58 supports the principle of specialist housing provision and provision for other specific housing needs based upon a Council need and demand assessment. The need for additional retirement housing in the locality is verified within this study.

In particular, the landowner has been in discussion with the Senior Housing Strategy Officer within East Lothian Council regarding the Fa'side (Housing Sub-Market Area 01) area which includes Ormiston.

The Council's assessment notes SESPlan HNDA2 Outputs (March 2015) which evidence that for the East Lothian Housing Sub-Market Area 01 (2012-32) there is a need for 3,303 to 3,909 social rented units depending on the economic scenario applied. It is envisaged that the proposed site can provide a mixed-tenure solution including affordable rented units managed by an RSL.

In addition, analysis of information from National Records of Scotland (NRS) figures at Ward level and the area proposed for development for the population group of 65+ shows a projected increase from 3,161 in 2012 to 4,750 in 2026, i.e. an increase of 50.3% which is very high when compared with the remainder of East Lothian.

This evidences a high level of affordable housing need and for housing for the over 65 age group across East Lothian with a particularly high need in the Fa'side area.

As noted above, the landowner has entered into discussions with Places for People with regard to taking forward a specialist retirement housing proposal for the site.

It is considered that the proposal would complement mainstream housing development growth at Ormiston. A mixed-tenure solution could be provided with a combination of affordable rent, discounted sale or other tenures to be agreed.

The need for this type of housing has been confirmed by the Council's own Housing Need and Demand Assessment, as per discussions between the landowner and Council's Housing Strategy team.

Notwithstanding discussion with an RSL, the landowner intends to apply for viability funding from the Government's Rural Housing Fund to fully prepare a proposal for part of the site. This could provide for an element of the site to be retained by the landowner as long term affordable rented retirement housing (the governance structure is to be investigated to ensure this long term social benefit is maintained).

There is potential for a planning application to be prepared in early 2017 to include supporting studies including landscape, design and technical assessment.

Tranent Cluster - Ormiston

The Spatial Strategy for the Tranent Cluster includes one allocated site south of Limeylands Road, Ormiston (Proposal TT10) which actually comprises a wider site including an allocated site from the adopted Local Plan and two subsequent extensions granted planning permission.

Additionally, the strategy does not include land north of Limeylands Road (for 120 units) which is the subject of a minded to grant Appeal Notice of Intention (Ref.PPA-210-2048, 24th February 2016) subject to conclusion of an associated Section 75 legal agreement.

The proposed site south of Hillview Road is on the opposite edge of the village and would form a limited expansion for a specific housing need, as detailed

hereafter.

The proposed site was submitted to the LDP Main Issues Report consultation and the Council have provided a Site Assessment within Appendix 7 of the LDP Environmental Report (ref.MIR/TT/HSG132) which is assessed below.

This representation objects to the current Spatial Strategy for the Tranent Cluster and seeks inclusion of the proposed housing site at Hillview Road, Ormiston for specialist retirement housing (site capacity to be confirmed) with associated amendments to Table HOU1 and Inset Map 30 (Ormiston).

Site Effectiveness

PAN2/2010 criteria for assessing site effectiveness provide a test against which sites require to be gauged with the land at Ormiston considered effective, being free of potential site constraints and able to deliver units within the plan period. Specifically:-

Ownership

The site is owned by a willing seller.

Status: Effective

Physical

The site is not known to be restricted by any physical factors which would preclude development. Site access can be taken from Hillview Road.

Status: Effective

Contamination

The site, given its greenfield arable nature, has been deemed to have a low risk of contamination.

Status: Effective

Deficit Funding

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

Status: Effective

Marketability

The proposal is for specialist retirement housing which has been identified as a housing need within East Lothian and the site can be developed within a five year timescale.

Status: Effective

Infrastructure

The proposal can be accommodated within existing infrastructure (and does not require education capacity), subject to localised upgrades.

Status: Effective

Land Use

Housing is the predominant proposed use for the site.

Status: Effective

Overall, there are no known constraints which will hinder delivery of housing completions within the LDP period.

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

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

Modifications(s) Sought:

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

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

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

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

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):

Housing Land Supply

Table HOU1 sets out Proposed LDP housing proposals with new sites providing for 7,772 units in the period 2009-32 with Table HOU2 setting out the extent to which LDP sites can contribute to the LDP requirement in the periods 2009-19 and 2019-24.

Contribution from Proposed LDP sites is considered optimistic. In particular, the LDP Housing Technical Note Appendix 2 sets out estimated programming of Proposed LDP sites and it is noted that an estimated 790 completions are programmed on 35 No. LDP sites in 2017/18 with a further 1,325 completions programmed for 2018/19. This will require planning approvals with agreed legal agreements and associated infrastructure (school) provision to allow for site starts by October 2017 at the latest. This is highly optimistic given the LDP examination requirements in 2017 along with associated impact on infrastructure programming.

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

To counter the real risk that further slippage will occur in implementing the proposed allocations, further sites should be allocated/approved to increase the chances of strategic targets being achieved. The proposed site provides an opportunity for mixed-tenure specialist retirement provision to contribute to this requirement.

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

Modifications(s) Sought:

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

Justification for Modification(s):

3a Maintaining an Adequate Effective Five-Year Housing Land Supply - What modifications do you wish to see made to the Maintaining an Adequate Effective Five-Year Housing Land Supply section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

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

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

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

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

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

3b Please give any information/reasons in support of each modification suggested to the Maintaining an Adequate Five-Year Housing Land Supply section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

Effective Land Supply Methodology

Paragraph 3.44 and 'Advice Box 1' sets out the Council's position on assessing whether a five year effective housing land supply is being maintained. The proposed calculation does not take into account the SPP requirement for a 10%-20% generosity allowance on top of the housing land requirement. This should be reflected in effective land supply calculations.

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

Paragraphs 3.46 and 3.48 suggests that the Council will discount the marketability criteria of PAN2/2010 when assessing effective land supply shortfall. This is contrary to national policy and should be deleted.

Policy HOU2 sets out the criteria by which potential new sites to meet an effective land supply shortfall should be assessed. It is noted that the recent Edinburgh LDP examination report recommends that their similar policy should reflect SESplan Policy 7 with just the addition of effectiveness and contribution to sustainable development. This approach should be reflected in East Lothian and proposed Policy HOU2 should be amended accordingly.

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

the next question.

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

5b Please give any information/reasons in support of each modification suggested to the Specialist Housing Provision & Other Specific Needs section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

Proposals Map

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

Modifications(s) Sought:

Inset Map 30 (Ormiston) - add proposed housing site at Hillview Road, Ormiston (LDP Environmental Report Site Assessment ref.MIR/TT/HSG132)

Amend Countryside Around Towns designation at south-east Ormiston to exclude above site.

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

Justification for Modification(s) :

Proposed housing site justification within response to Tranent Cluster Strategy.

Countryside Around Towns

Paragraphs 5.20 to 5.22 and Policy DC8 set out the Council's proposed Countryside Around Towns policy. The proposed site is covered by this designation and is included within a wider identified area to the south-east of Ormiston.

It is acknowledged that the aim of this policy is to conserve the landscape setting of identified settlements within East Lothian. It is also noted that these areas can also provide opportunities to extend the wider green network and related recreational accessibility. The policy puts in place similar restrictions as a Green Belt designation and has the effect of shaping settlement growth.

The LDP Technical Note 8 - Countryside Around Towns, sets out the specific reasoning for including certain areas and with regard to land south-east of Ormiston, states:

"Land to the south of Ormiston, adjoining the glebe field and extending to the Tyne Water forms a prominent and visible part of the setting of the Ormiston Conservation Area when viewed from the A6093 and B6371 to the south. It provides an attractive setting and approach to Ormiston from the south that should be retained as countryside. Development to the south of the village would be visually detrimental to the landscape setting and character of the historic core of the village."

In term of the proposed designation at Ormiston, the special character and appearance of the Conservation Area village core is acknowledged and supported. However, whilst the setting of this area should be protected the proposed designation boundaries are excessive and should be reduced.

In particular, the housing along the south of Hillview Road is two-storey ex-local authority terraced and semi-detached stock and not within the Ormiston Conservation Area.

The longer range views from the A6093 and B6371 to which the Technical Note refers highlight the rear of this housing, which cannot be deemed an attractive settlement edge.

The proposed site affords the possibility of providing a suitable landscape screen on the southern edge which would assist with visual interpretation of the setting of the village core.

Figure 2 outlines the proposed site in the context of the highlighted long range views and illustrates the potential to improve the settlement edge. The site's north-eastern boundary could also be designed to provide for a landscaped frontage to Hillview Road.

It should be noted that land further south from the proposed site is subject to flood risk from the adjoining Tyne Water which therefore precludes any risk of further urban growth to the south-east.

This representation therefore objects to the extent of the proposed Countryside Around Towns policy designation south-east of Ormiston and seeks exclusion of the proposed site for the reasons stated above.

Visual Upload:

Hillview Road.pdf was uploaded

Visual Upload:

Landscape plan.pdf was uploaded

Representation to
East Lothian Proposed Local Development Plan

In Support of
Hillview Road, Ormiston

Prepared by
Clarendon Planning and Development Ltd

On behalf of
The Esperance Trust

November 2016



- 3 Introduction & Proposed Site**
- 4 Section 1: Aims, Objectives & Outcomes**
- 4 Section 2: Spatial Strategy**
- 5 Section 3: Growing our Economy & Communities**
 - Planning for Housing
- 6 Section 5 - Diverse Countryside & Coastal Areas**
 - Countryside Around Towns
- 7 Environmental Report Appendix 7**
 - Site Assessment
- 8 Conclusions - A Deliverable Site:**
 - Site Effectiveness Summary
 - Proposed Development
 - Summary

This representation to the East Lothian Proposed Local Development Plan (LDP) has been prepared by Clarendon Planning & Development Ltd on behalf of The Esperance Trust.

The representation objects to the non-inclusion of land at Hillview Road, Ormiston as a (specialist) residential development site.

It is considered that the site presents a small-scale, effective housing site which can contribute towards East Lothian's 5 year supply of effective housing land and, in particular, the need for **specialist retirement housing** to complement existing mainstream housing proposals in the village.

In this regard, discussions have taken place between the landowner and Places for People, an established Registered Social Landlord, who would act as developer of the proposed retirement properties. Alternatively, an agreed governance structure would be put in place by the landowner to allow for funding via the Rural Housing Fund for part or all of the site.

The landowner has also been in discussion with East Lothian Council's Housing Strategy section and the Council's emerging Need and Demand Assessment Report on Specialist Housing confirms the need for this type of housing in the Fa'side Ward for East Lothian.

The representation addresses the relevant Proposed LDP sections and seeks inclusion of the site as a (specialist) housing allocation within the Proposed East Lothian Local Development Plan.

The site extends to approximately 2.4 hectares (6 acres) and sits on the south-eastern edge of Ormiston, bound by established housing to north and west, tree planting on the southern edge with an opportunity to create a new landscaped edge to east. The site boundary is indicated on **Figure 1**.

The site previously formed part of a wider agricultural landholding which is now in separate legal ownership and therefore, the proposed site is not a viable agricultural enterprise in its own right.

The opportunity is based upon a small-scale, high quality landscaped approach to create a suitably scaled extension to accommodate a specific housing need in the area.

The site capacity will be determined by the agreed form and type of housing units and associated landscaping requirements, in conjunction with the potential RSL partner and East Lothian Council.



Figure 1 - Site boundary, Hillview Road, Ormiston

Aims & Strategy Drivers

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

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

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

The plan's **key aims are broadly supported** in terms of East Lothian's role within the Edinburgh City Region.

East Lothian therefore requires to accommodate its share of the growth requirements as set out in SESplan for South-East Scotland with a primary focus on the East Lothian Strategic Development Area centred upon the main A1/East Coast Rail transport corridor.

It is clear that 'appropriate timescales' in delivering spatial strategy, as noted within Aim No.2, are going to be difficult to meet in terms of pre-2019 strategic housing requirements.

Objectives & Outcomes

- *Promote sustainable development*

This objective is supported. With regard to Ormiston, the proposed site is close to the village centre services and bus routes.

- *Help grow the economy, increase housing supply and reduce inequalities*

This objective is supported. The proposed housing site at Ormiston will address this objective by virtue of providing additional housing (retirement properties) along with associated job creation and local economic benefits.

- *Protect and enhance the area's high quality environment and its special identity*

This objective is supported. The proposed site at Ormiston does not sit within a Special Landscape Area. The proposed Countryside Around Towns designation is contested as detailed hereafter.

- *Ensure adequate infrastructure capacity and an appropriate use of resources*

This objective is supported. The proposed retirement housing use would not place further pressure on education capacity whilst proportionate contributions can be provided to wider transport requirements.

The **Spatial Strategy for the Tranent Cluster** includes one allocated site south of Limeylands Road, Ormiston (Proposal TT10) which actually comprises a wider site including an allocated site from the adopted Local Plan and two subsequent extensions granted planning permission.

Additionally, the strategy does not include land north of Limeylands Road (for 120 units) which is the subject of a minded to grant Appeal Notice of Intention (Ref.PPA-210-2048, 24th February 2016) subject to conclusion of an associated Section 75 legal agreement.

The proposed site south of Hillview Road is on the opposite edge of the village and would form a limited expansion for a specific housing need, as detailed hereafter.

The proposed site was submitted to the LDP Main Issues Report consultation and the Council have provided a Site Assessment within Appendix 7 of the LDP Environmental Report (ref.MIR/TT/HSG132) which is assessed below.

This representation objects to the current Spatial Strategy for the Tranent Cluster and seeks inclusion of the proposed housing site at Hillview Road, Ormiston for specialist retirement housing (site capacity to be confirmed) with associated amendments to Table HOU1 and Inset Map 30 (Ormiston).

Proposed LDP

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

Housing Land Supply

Table HOU1 sets out Proposed LDP housing proposals with new sites providing for 7,772 units in the period 2009-32 with Table HOU2 setting out the extent to which LDP sites can contribute to the LDP requirement in the periods 2009-19 and 2019-24.

Contribution from Proposed LDP sites is considered optimistic. In particular, the LDP Housing Technical Note Appendix 2 sets out estimated programming of Proposed LDP sites and it is noted that an estimated 790 completions are programmed on 35 No. LDP sites in 2017/18 with a further 1,325 completions programmed for 2018/19. This will require planning approvals with agreed legal agreements and associated infrastructure (school) provision to allow for site starts by October 2017 at the latest. This is highly optimistic given the LDP examination requirements in 2017 along with associated impact on infrastructure programming.

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

To counter the real risk that further slippage will occur in implementing the proposed allocations, further sites should be allocated/ approved to increase the chances of strategic targets being achieved. The proposed site provides an opportunity for mixed-tenure specialist retirement provision to contribute to this requirement.

Effective Land Supply Methodology

Paragraph 3.44 and **'Advice Box I'** sets out the Council's position on assessing whether a five year effective housing land supply is being maintained. The proposed calculation does not take into account the SPP requirement for a 10%-20% generosity allowance on top of the housing land requirement. This should be reflected in effective land supply calculations.

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

Paragraphs 3.46 and 3.48 suggests that the Council will discount the marketability criteria of PAN2/2010 when assessing effective land supply shortfall. This is contrary to national policy and should be deleted.

Policy HOU2 sets out the criteria by which potential new sites to meet an effective land supply shortfall should be assessed. It is noted that the recent Edinburgh LDP examination report recommends that their similar policy should reflect SESplan Policy 7 with just the addition of effectiveness and contribution to sustainable development. This approach should be reflected in East Lothian and proposed Policy HOU2 should be amended accordingly.

Affordable Housing

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

Specialist Housing

Paragraph 3.58 supports the principle of specialist housing provision and provision for other specific housing needs based upon a Council need and demand assessment. **The need for additional retirement housing in the locality is verified within this study.**

In particular, the landowner has been in discussion with the Senior Housing Strategy Officer within East Lothian Council regarding the Fa'side (Housing Sub-Market Area 01) area which includes Ormiston.

The Council's assessment notes SESplan HNDA2 Outputs (March 2015) which evidence that for the East Lothian Housing Sub-Market Area 01 (2012-32) there is a need for 3,303 to 3,909 social rented units depending on the economic scenario applied. It is envisaged that the proposed site can provide a mixed-tenure solution including affordable rented units managed by an RSL.

In addition, analysis of information from National Records of Scotland (NRS) figures at Ward level and the area proposed for development for the population group of 65+ shows a projected increase from 3,161 in 2012 to 4,750 in 2026.

This is an increase in numbers of 50.3% which is very high when compared with the remainder of East Lothian.

This evidences a high level of affordable housing need and for housing for the over 65 age group across East Lothian with a particularly high need in the Fa'side area.

Proposed LDP

Section 5: Diverse Countryside & Coastal Areas - Green Belt

Countryside Around Towns

Paragraphs 5.20 to 5.22 and Policy DC8 set out the Council's proposed Countryside Around Towns policy. The proposed site is covered by this designation and is included within a wider identified area to the south-east of Ormiston.

It is acknowledged that the aim of this policy is to conserve the landscape setting of identified settlements within East Lothian. It is also noted that these areas can also provide opportunities to extend the wider green network and related recreational accessibility. The policy puts in place similar restrictions as a Green Belt designation and has the effect of shaping settlement growth.

The LDP Technical Note 8 - Countryside Around Towns, sets out the specific reasoning for including certain areas and with regard to land south-east of Ormiston, states:

“Land to the south of Ormiston, adjoining the glebe field and extending to the Tyne Water forms a prominent and visible part of the setting of the Ormiston Conservation Area when viewed from the A6093 and B6371 to the south. It provides an attractive setting and approach to Ormiston from the south that should be retained as countryside. Development to the south of the village would be visually detrimental to the landscape setting and character of the historic core of the village.”

In term of the proposed designation at Ormiston, the special character and appearance of the Conservation Area village core is acknowledged and supported. However, whilst the setting of this area should be protected the proposed designation boundaries are excessive and should be reduced.

In particular, the housing along the south of Hillview Road is two-storey ex-local authority terraced and semi-detached stock and not within the Ormiston Conservation Area.

The longer range views from the A6093 and B6371 to which the Technical Note refers highlight the rear of this housing, which cannot be deemed an attractive settlement edge.

The proposed site affords the possibility of providing a suitable landscape screen on the southern edge which would assist with visual interpretation of the setting of the village core.

Figure 2 outlines the proposed site in the context of the highlighted long range views and illustrates the potential to improve the settlement edge. The site's north-eastern boundary could also be designed to provide for a landscaped frontage to Hillview Road.

It should be noted that land further south from the proposed site is subject to flood risk from the adjoining Tyne Water which therefore precludes any risk of further urban growth to the south-east.

This representation therefore objects to the extent of the proposed Countryside Around Towns policy designation south-east of Ormiston and seeks exclusion of the proposed site for the reasons stated above.

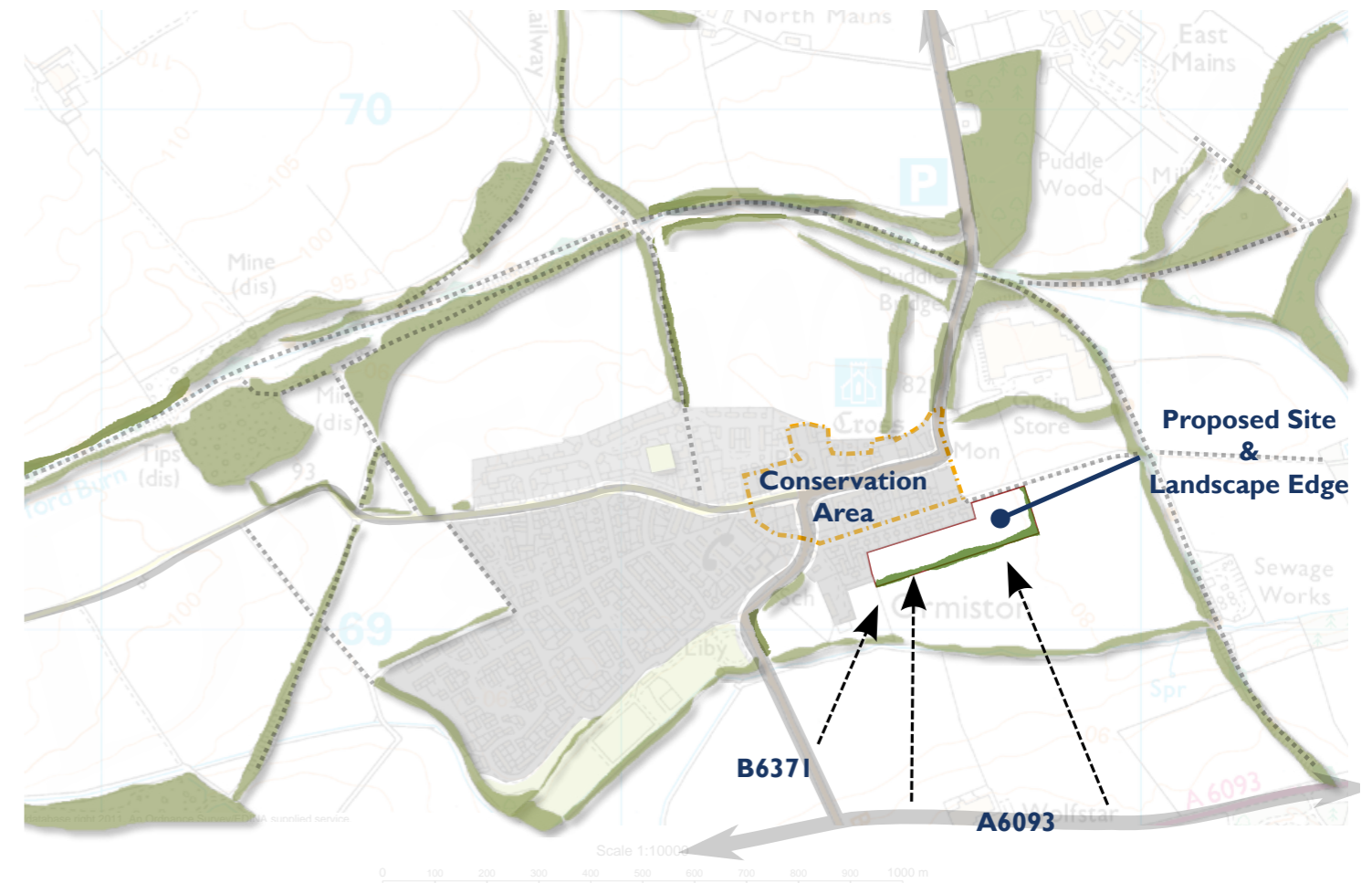


Figure 2 - Site boundary, Hillview Road, Ormiston

Proposed LDP Environmental Report Appendix 7

Site Assessment: Hillview Road, Ormiston

The Council has provided a Site Assessment for each of the sites promoted for development within the Proposed LDP Environmental Report.

The proposed site is included as site ref.MIR/TT/HSG132 within Appendix 7 of the Environmental Report (Pages 277-281).

The following provides an analysis of this assessment.

Each comment accords with the colour coding utilised by the Council, i.e. green (positive), amber (any constraints can be overcome), red (significant constraint).

Location

- The assessment notes the site is well located to the existing settlement. **Considered this should be 'positive'**.

Accessibility

- The assessment notes that the site is within 400m of a bus stop and 1600m of local services. **Considered this should be 'positive'**.

Exposure

- The assessment notes that the site benefits from shelter from northern winds due to the adjoining built form. **Considered this should be 'positive'**.

Aspect

- The assessment notes that the site has a generally eastern aspect. **Considered this should 'positive'**.

Suitability for Proposed Use

- The assessment notes that the proposed housing development would be unlikely to conflict with surrounding land uses (residential and agriculture). **Confirmed 'positive'**.

Fit with local/strategic policy objectives

- The assessment notes the site is located within East Lothian's SDA as defined by SESplan and its development would therefore align well with strategic policy objectives of steering new development towards the most sustainable locations within the city region. **Confirmed 'positive'**.

Physical Infrastructure Capacity

- The assessment notes that Hillview Road would require extension for vehicular and pedestrian traffic but would have capacity for the proposal. Wider traffic impacts may require financial contributions. Water treatment capacity exists but waste water treatment capacity is required. **Considered this should 'positive'**.

Service Infrastructure Capacity

- The assessment notes the potential extension of capacity for primary and secondary schools. The proposal for retirement housing would have no impact upon this. **Considered this should 'positive'**.

Deliverability/Effectiveness

- The assessment notes that infrastructure capacity has to be confirmed. **Considered 'neutral'**.

Biodiversity, flora & fauna

- The assessment notes the site is not within any areas designated for their international, national or local nature conservation areas. Use of the site for housing is likely to increase the variety of habitat over the current agricultural use. Song Thrush, a notable species, has been recorded within 100m of the site. This species may benefit from housing development. No SPA bird species were recorded in the tetrad in which it sits. The site is around 6.5 km from the Firth of Forth PA and is small. It is therefore screened out of the HRA. **Confirmed 'positive'**.

Population

- The assessment notes the site would provide housing, including an element of affordable housing to help meet local need. Its development may make a contribution to the regeneration of Ormiston, parts of which are the comparatively disadvantaged. The site has reasonable access to facilities, services, and employment opportunities by active travel or public transport. **Confirmed 'positive'**.

Human Health

- The assessment notes that the site has some access to the core path network, which is located to the east and west of the site. Traffic in through Tranent is likely to increase, with potential adverse impacts on air quality.

Soil

- The development of the site would result in some loss of Class 2 prime agricultural land but there are no rare or carbon rich soils on this site. It is noted that the majority of the LDP allocated sites result in loss of prime agricultural land.

Water

- The assessment notes the site is not shown to be at risk of flooding however to the east and south of the site there are large areas at medium risk of river flooding. **Considered 'this should positive'**.

Air

- Development on the site would not be affected by existing sources of air pollution and the site would have moderate public transport accessibility. **Considered 'neutral'**.

Climatic Factors

- The assessment notes the risk of car-based journeys to increase emissions. Given East Lothian settlement pattern, this is a similar risk

to all housing allocations in smaller settlements.

Material Assets

- The site has been assessed negatively as greenfield land but this is the case in the majority of the allocated LDP sites. **Considered 'neutral'**.

Cultural Heritage

- The assessment notes the site is not located within a conservation area and is not located adjacent to or within a scheduled and ancient monument with no listed buildings within the site. Historic Environment Scotland makes no comment on this site. **Considered 'neutral'**.

Landscape

- The assessment notes the site is bounded by existing residential development to the west end and a large section of the northern boundary with a track forming the remaining section of the northern boundary which links to the Ormiston Railway Walk core path route 72. A landscape boundary has been planted on the site's southern edge. Whilst the assessment notes the potential impact upon the setting of the historic heart of Ormiston, it also notes that limiting development to the section of site directly south of Hillview Road would minimise adverse landscape impact and contain the development within the existing settlement pattern. Landscaping proposals to integrate the site are noted above. **Considered that landscape should be assessed as amber with constraints capable of being overcome with suitable landscape design improving current long range views.**

Overall

- **The proposed site would offer landscape enhancements to the south-east edge of Ormiston and provide specialist retirement housing in a suitable location accessible to public transport and services.**

Conclusions - A Deliverable Site

Site Effectiveness Summary

Scottish Planning Policy and guidance set out in PAN 2/2010 Affordable Housing and Housing Land Audits require that sites allocated within Local Development Plans are effective, being able to contribute completions during the plan period (up to year 10 from LDP adoption).

As such, PAN2/2010 criteria for assessing site effectiveness provide a test against which sites require to be gauged with the **land at Ormiston considered effective, being free of potential site constraints and able to deliver units within the plan period.** Specifically:-

Ownership

The site is owned by a willing seller.
Status: **Effective**

Physical

The site is not known to be restricted by any physical factors which would preclude development. Site access can be taken from Hillview Road.
Status: **Effective**

Contamination

The site, given its greenfield arable nature, has been deemed to have a low risk of contamination.
Status: **Effective**

Deficit Funding

The development would be privately funded, also allowing for required infrastructure upgrades.
Status: **Effective**

Marketability

The proposal is for **specialist retirement housing which has been identified as a housing need within East Lothian** and the site can be developed within a five year timescale.
Status: **Effective**

Infrastructure

The proposal can be accommodated within existing infrastructure (and does not require education capacity), subject to localised upgrades.
Status: **Effective**

Land Use

Housing is the predominant proposed use for the site.
Status: **Effective**

Overall

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

Proposed Development

As noted above, the landowner has entered into discussions with Places for People with regard to taking forward a specialist retirement housing proposal for the site.

It is considered that the proposal would complement mainstream housing development growth at Ormiston. A mixed-tenure solution could be provided with a combination of affordable rent, discounted sale or other tenures to be agreed.

The need for this type of housing has been confirmed by the Council's own Housing Need and Demand Assessment, as per discussions between the landowner and Council's Housing Strategy team.

Notwithstanding discussion with an RSL, the landowner intends to apply for viability funding from the Government's Rural Housing Fund to fully prepare a proposal for part of the site. This could provide for an element of the site to be retained by the landowner as long term affordable rented retirement housing (the governance structure is to be investigated to ensure this long term social benefit is maintained).

There is potential for a planning application to be prepared in early 2017 to include supporting studies including landscape, design and technical assessment.

Summary

The landowner objects to the current Tranent Cluster Spatial Strategy and seeks inclusion of the proposed housing site at Hillview Road, Ormiston (capacity to be confirmed) with associated amendments to the Ormiston inset map and Table HOU1.

Additionally, the landowner objects to the extent of the proposed Countryside Around Towns designation south-east of Ormiston for the reasons outlined above and seeks removal of the proposed site from this restrictive policy. It is considered that the proposal, with suitable landscape design, could enhance the landscape edge of Ormiston and address issues highlighted in the associated Technical Note.

This representation outlines a proposal for specialist retirement housing which can expand housing choice in Ormiston and would be developed and managed by an established Registered Social Landlord or alternative agreed governance structure.

Clarendon Planning and Development Ltd

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Edinburgh EH1 2DP**

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www.clarendonpd.co.uk**



From: .
To: [Local Development Plan](#)
Cc: [shonagh mcewan](#); [Gullane Parent Council](#); [Jude Leslie](#)
Subject: Comments in relation to East Lothian Council Proposed Local Development Plan 2016
Date: 06 November 2016 15:28:10

Dear Sirs,

The Parent Carer Council of Gullane Primary School (PCC) is constituted under the Scottish Schools (Parental Involvement) Act 2006 and represents the views of the parent body at Gullane Primary School.

The PCC has the following comments in relation to the proposed East Lothian Council Local Development Plan 2016.

1. The PCC notes that there are four major sites proposed for housing development in Gullane - Fenton Gait East, Fenton Gait South, Saltcoats Field and the site of the old Fire Training College. The PCC notes that these four sites together could generate a minimum of 339 houses (planning applications have been submitted for 49 houses at Fenton Gait East, 150 houses at Saltcoats Field, 125 houses at the old fire school and the LDP suggests 15 houses at Fenton Gait South). This equates to Gullane growing by approximately 30%. Recent experience in Gullane indicates that the cumulative impact of these developments could ultimately generate an extra 339 primary aged children.
2. The PCC surveyed all Gullane Primary School parents in March 2016 to ascertain their views about proposed developments in Gullane. The survey response rate equated to 77% of all families attending the school. Significant findings were:
 - * 84% of parents were concerned that the formula used by East Lothian Council to work out numbers of primary school pupils generated per new build house were inadequate;
 - * 94% of parents were concerned that the existing school facilities are inadequate;
 - * 96% of parents were concerned that proposed developments would detrimentally impact on road safety issues around the school;
 - * 89% of parents were concerned that the proposed developments would not have a positive impact on the school;
 - * 95% of parents were concerned to ensure that the southern boundary of the school was protected from development.
3. The PCC notes East Lothian Council's explanation of how it estimates the numbers of primary/secondary pupils "generated per new build house". The PCC remains concerned that the numbers of children generated by 339 houses could be significantly underestimated. Even a moderate underestimate could result in significant additional pressures on Gullane Primary School. The PCC would ask for assurances that if these sites remain in the Local Development Plan the Council's base ratio for primary pupils generated per house of 0.356 will be increased to take account of recent local experience and the types of houses that are proposed in these developments.
4. Furthermore, the PCC notes with concern that the proposed Local Development Plan appears to suggest that if all of these developments go ahead, Gullane Primary School will only require an additional two classrooms and 20 additional nursery places. **The PCC suggests that this provision is woefully inadequate to cater for the numbers of children realistically generated from such developments.**
5. At a meeting held by the PCC with East Lothian Council on 20 April 2016 ELC acknowledged that Gullane Primary School is at capacity. ELC also acknowledged that as things stand a new dedicated hall for PE is required, together with a general purpose room for 30 children and extra toilet facilities. It is clear that development of 339 houses will only add to the pressures on the school facilities. ELC advised that housing developers cannot be asked to fund educational facilities that are already required. Given this background, what facilities and resources will be provided at Gullane Primary

School if all 4 sites are built on and who will provide them? Furthermore, what (if any) specific planning conditions can ELC place on these development sites in relation to necessary school expansion?

6. The PCC has serious concerns about road safety in the vicinity of Gullane Primary School, including on the Main Road and West Fenton Road. Accordingly the PCC requests that the proposed Local Development Plan should ensure that if these sites are to be zoned for development, planning applications are conditional on appropriate road safety/traffic control measures being put in place; and that footpaths/safe cycle routes linking the proposed developments with other parts of the village (including the Main Road) are implemented;
7. The PCC is concerned that the southern boundary of Gullane Primary School may become landlocked. Although the master plan for the proposed Local Development Plan shows an area of land delineated as "School expansion land" on Saltcoats Field the PCC would ask that if Saltcoats Field remains zoned for development in the final version of the Local Development Plan, any planning permission is conditional on a title condition that guarantees that this land to the south of Gullane Primary School is protected for educational purposes only.

We should be grateful if the above points could be taken into account when considering the proposed Local Development Plan. We are happy to provide further information if required and can be contacted by post at Gullane Primary School Parent Carer Council, c/o Gullane Primary School, Muirfield Terrace, Gullane.

Yours faithfully,

Gullane Parent Carer Council

From: .
To: [Local Development Plan](#)
Cc: [Berry, David](#); [Goodfellow, Jim](#); [Rodger, Lauren](#)
Subject: North Berwick High School Parent School Partnership: comments on Proposed LDP 2016
Date: 06 November 2016 15:30:56

[1] SAFEGUARDED LAND

We note the following in the main document, pages 79–80:

“3.107 An expansion of North Berwick High School is committed to accommodate sites allocated by the previous local plan. The LDP continues to safeguard land adjacent to the Mains Farm site to the west of the high school campus for the further expansion of the high school facility.

PROP ED7

Part A

The Council will provide additional phased permanent extension to North Berwick High School to meet the need arising from proposed new housing development in the North Berwick cluster. Developer contributions will be sought from the developers of housing land to fund the costs of this permanent provision, which will be the subject of legal agreements.

Part B

The Council will provide additional campus land at:

i. North Berwick High School ...

Developer contributions will be sought from the developers of relevant sites to fund the costs of providing this campus land, which will also be the subject of legal agreement including with the landowners of the relevant campus land.”

COMMENT: We welcome this confirmation that land lying between the High School and the Mains Farm site is to be safeguarded. However, we would stress that the entire strip of land west of the High School – not just the portion currently identified as the minimum sufficient for school expansion – should be safeguarded from any kind of building development that is unrelated to the High School. For example, the community playing field should remain within the residentially developed part of the Mains Farm site, not shifted onto part of the safeguarded strip to allow for any other kind of building development at Mains Farm. Whatever its future purpose, the whole strip from Grange Road to the southern perimeter of the School campus, along with its delineated margins to east and west, can be seen as therapeutic green open space and an ideal location for outdoor learning and environmental studies.

[2] PE HALL

We note the following in Technical Note 14, page 40:

“Overall accommodation requirement – 11 classrooms, 1 science, 1 technology, 1 music, 1 art, additional dining, PE hall, changing and other core requirements to increase from existing capacity (950) to LDP capacity (1200). Additional PE hall will offset need for additional community requirements for LDP developments.”

COMMENT: We welcome the undertaking to adjust the core requirements upwards to LDP capacity. We would stress that the PE hall’s size should be pinned at maximum applicable capacity because, going forward, the High School must contain a facility that covers its entire sporting requirements with no necessity to share the community facility at North Berwick Sports Centre.

[3] PUPIL-TO-HOUSE RATIO

COMMENT: We would ask the local authority to review its ratio for calculating extra school capacity at North Berwick High School. Many of the houses being built in, or being planned for, the High School’s catchment are large-size family houses. The number of pupils attending the High School from these new-build developments is likely to be greater than the currently calculated East Lothian average, which means that the theoretical capacity increase (and associated requirement for developer contributions) for North Berwick will probably be a significant underestimate in practice.

Eddie Clark

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-06 20:49:04**

About You

1 What is your name?

First name:

Paul

Surname:

Scott

2 What is your email address?

Email address:

ps@scotthobbsplanning.com

3 Postal Address

Address:

24A Stafford Street, Edinburgh

4 Please enter your postcode

Postcode:

EH3 7BD

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

Other

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

Organisation:

Queen Margaret University c/o Scott Hobbs Planning

Your role:

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

Section 1 - Introduction (pages 1-10)

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

Modification(s) sought::

See attached Representation

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

Justification for Modification(s):

See attached Representation

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

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

Modifications(s) sought:

See attached Representation

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

Justification for Modification(s):

See attached Representation

Section 2a - Musselburgh Cluster Strategy Map (pg 15)

1a Strategy Map for Musselburgh Cluster - what modifications do you wish to see made to the Strategy Map for the Musselburgh Cluster in the proposed Plan? Your justification for this will be sought in the next question.

Modifications(s) Sought:

See attached Representation

1b Strategy Map for Musselburgh - Please give any information/reasons in support of each modification suggested to the Strategy Map for Musselburgh in the proposed Plan.

Justification for Modification(s):

See attached Representation

Section 2a - Introduction to Musselburgh Cluster (pg 16)

1a Introduction to Musselburgh Cluster - what modifications do you wish to see made to the Introduction of the Musselburgh 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:

See attached Representation

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

Justification for Modification(s):

See attached Representation

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

1a PROP MH1: Land at Craighall, Musselburgh - what modifications do you wish to see made to Prop MH1 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

See attached Representation

1b Please give any information/reasons in support of each modification suggested to Prop MH1 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

See attached Representation

2a PROP MH2 - Land at Old Craighall Village - What modifications do you wish to see made to Prop MH2 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

2b Please give any information/reasons in support of each modification suggested to MH2: Land at Old Craighall Village of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

3a PROP MH3 Land at Old Craighall Junction South West, Musselburgh - What modifications do you wish to see made to Prop MH3 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

3b Please give any information/reasons in support of each modification suggested to Prop MH3 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

4a PROP MH4: Land at Old Craighall Junction, Musselburgh - What modifications do you wish to see made to Prop MH4 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

4b Please give any information/reasons in support of each modification suggested to Prop MH4 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

5a PROP MH5: former Edenhall Hospital Site, Musselburgh - What modifications do you wish to see made to Prop MH5 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

5b Please give any information/reasons in support of each modification suggested to Prop MH5 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

6a PROP MH6: Pinkie Mains, Musselburgh - What modifications do you wish to see made to Prop MH6 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

6b Please give any information/reasons in support of each modification suggested to Prop MH6 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

7a PROP MH7: Pinkie Mains, Musselburgh (Intensification) - What modifications do you wish to see made to Prop MH7 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

7b Please give any information/reasons in support of each modification suggested to Prop MH7 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

8a PROP MH8: Levenhall, Musselburgh - What modifications do you wish to see made to Prop MH8 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

8b Please give any information/reasons in support of each modification suggested to Prop MH8 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

9a PROP MH9: Land at Wallyford - What modifications do you wish to see made to Prop MH9 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

9b Please give any information/reasons in support of each modification suggested to Prop MH9 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

10a PROP MH10: Land at Dolphingstone - What modifications do you wish to see made to Prop MH10 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

10b Please give any information/reasons in support of each modification suggested to Prop MH10 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

11a PROP MH11: New Secondary School Establishment, Musselburgh - What modifications do you wish to see made to Prop MH11 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

11b Please give any information/reasons in support of each modification suggested to Prop MH11 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

12a PROP MH12: Barbachlaw, Wallyford - What modifications do you wish to see made to Prop MH12 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

12b Please give any information/reasons in support of each modification suggested to Prop MH12 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

13a PROP MH13: Land at Howe Mire, Wallyford - What modifications do you wish to see made to Prop MH13 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

13b Please give any information/reasons in support of each modification suggested to Prop MH13 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

14a PROP MH14: Land at Whitecraig South - What modifications do you wish to see made to Prop MH14 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

14b Please give any information/reasons in support of each modification suggested to Prop MH14 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

15a PROP MH15: Land at Whitecraig North - What modifications do you wish to see made to Prop MH15 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

15b Please give any information/reasons in support of each modification suggested to Prop MH15 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

16a PROP MH16: Whitecraig Primary School Expansion Land - What modifications do you wish to see made to Prop MH16 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

16b Please give any information/reasons in support of each modification suggested to Prop MH16 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

17a Policy MH17: Development Briefs - What modifications do you wish to see made to Policy MH17 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

See attached Representation

17b Please give any information/reasons in support of each modification suggested to Policy MH17 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

See attached Representation

18a PROP MH18: Levenhall links to Prestonpans: Area for Habitat Improvement - What modifications do you wish to see made to Prop MH18 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

18b Please give any information/reasons in support of each modification suggested to Prop MH18 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

Additional Information :

No file was uploaded

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

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

3a Maintaining an Adequate Effective Five-Year Housing Land Supply - What modifications do you wish to see made to the Maintaining an adequate Effective Five-Year Housing Land Supply section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

3b Please give any information/reasons in support of each modification suggested to the Maintaining an Adequate Five-Year Housing Land Supply section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

5b Please give any information/reasons in support of each modification suggested to the Specialist Housing Provision & Other Specific Needs section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

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

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

Modifications(s) Sought:

See attached Representation

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

Justification for Modification(s) :

See attached Representation

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

Proposals Map

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

Modifications(s) Sought:

See attached Representation

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

Justification for Modification(s) :

See attached Representation

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Visual Upload:

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East Lothian LDP Proposed Plan

Representation on behalf of Queen Margaret University

Introduction

1. This Representation is submitted on behalf of Queen Margaret University (QMU) in relation to the East Lothian Local Development Plan (LDP) Proposed Plan. The Proposed Plan consultation period closes on 7 November 2016.
2. QMU responded to the Main Issues Report (MIR) stage of the LDP preparation, in February 2015 and also submitted a pre-Proposed Plan publication in October 2015. Reference will be made to these submissions in this Representation.
3. The pre-Proposed Plan submission by QMU, in October 2015, makes reference to the **Masterplan and Delivery Strategy (MDS)**, which was under preparation at the time of the October 2015 submission. The MDS outlines the QMU proposals for the new Commercial Hub and Innovation Park centred on the University's Musselburgh campus and land immediately adjacent. The University considers that the development will be an exemplar project that firmly meets the criteria set out in the submissions to the Westminster and Scottish Governments as part of the Edinburgh City Region City Deal bid.
4. The MDS is submitted in response to the Proposed Plan consultation alongside this formal Representation and QMU invites ELC to consider the detail of this and ensure that it forms the basis of the finalised LDP proposals as they relate to the Craighall site.

Detailed Response

5. The following paragraphs outline the detailed response of QMU to the policies and proposals included within the Proposed Plan.

PROP MH1: Land at Craighall, Musselburgh

6. QMU recommended, in response to the MIR, that the overall allocation for land at Craighall would be better addressed as a series of sub-proposals. It recommended that the Commercial Hub and Innovation Park, centred on QMU land and land to the north-west of Queen Margaret Drive, should be identified separately from the remainder of the allocation, to ensure that they have a specific focus, and the infrastructure requirements associated with their delivery are clearly identified.
7. The Proposed Plan fails to take account of the QMU recommended approach, and on this basis, QMU **objects** to the current wording of PROP MH1 and recommends its redrafting as follows:

“PROP MH1a: Land at Craighall, Musselburgh – Queen Margaret University.

Queen Margaret University and land to the north-west of Queen Margaret Drive provides the opportunity to deliver the Commercial Hub and Innovation Park as identified in the QMU Masterplan and Delivery Strategy (2016). In addition to the

University, a Commercial Hub, and Innovation Park is envisaged for the site, incorporating up to 45,000 sqm of commercial (including a mix of uses such as hotel, local centre, community facilities, etc.) and Innovation Park. The delivery of this opportunity is predicated on the completion of the approved grade-separated junction on the A1 at QMU, to facilitate appropriate access to the site.

“This will be enabled by housing development elsewhere within the MH1 Craighall allocation as outlined below.

Land to the north-east of the University is allocated for mixed use development, including the relocated QMU car park and housing uses.”

“PROP MH1b: Land at Craighall, Musselburgh – Mixed Use Development

Land at Craighall, straddling the A1, is allocated for a mixed use development, including xx homes (exact number as included in finalised LDP), around 41 hectares of employment land, a new primary school and community uses, as well as infrastructure and associated works. This includes:

- *55 hectares of land to the east of Millerhill Marshalling Yards, between the freight rail loop and south of the A1, which is allocated for mixed use development including up to xx homes (as above) and around 20 hectares of employment land, to which Policy EMP1 will apply. Access to this land will be from the upgraded grade-separated junction on the A1 at QMU.*
- *21 hectares of land to the south of the A1 at Old Craighall, which is allocated for a mixed use, predominantly housing development, which has capacity for xx homes (as above). Access to this land will be from the local road network.*
- *15 hectares of land to the east of Queen Margaret University and north of the A1, which is allocated for housing and has capacity for xx homes (as above). Access to this land will be from the local road network.”*

“PROP MH1c: Land at Craighall, Musselburgh – Masterplanning and Enabling Development

A comprehensive Masterplan for the entire MH1 allocated site, which conforms to the MH1 Development Brief, will be required as part of any planning application for the allocated land. The Masterplan shall include a phasing plan which will commit to enabling infrastructure provision as follows:

- *The completion, and opening for public use, of the approved grade-separated junction on the A1 at QMU (PROP T16) prior to the occupation of a maximum of 100 houses within the overall MH1 allocation;*

- *The delivery of the infrastructure requirements for the site as outlined in the approved MH1 Development Brief, in accordance with the requirements of policy DEL1: Infrastructure and Facilities Provision and Supplementary Guidance: Developer Contributions Framework”.*
8. It is clear from the recommended revisions to PROP MH1 above that QMU **objects** to the vague and imprecise wording of the proposal and, in particular, its failure to identify the trigger for the delivery of essential infrastructure to enable the overall allocation to be successfully delivered. QMU **objects** to the absence of a trigger for the completion of the grade-separated junction on the A1 at QMU in advance of significant house building, which the proposal states will “*be enabled by housing development on other parts of the Craighall site*”.
 9. The housing proposed east of QMU, north of the A1 (circa 350 units) will result in the loss of the employment land allocated in the 2008 Local Plan. The MH1 allocation, as drafted in the Proposed Plan, retains the employment land north-west of QMU and allocates additional land south of the A1, but in the absence of a trigger, based on the programme of housebuilding elsewhere in the MH1 allocation, there is no prospect of either of these sites being successfully developed. The current A1 junction at QMU is severely constrained, with no access to QMU from the north-bound A1, or from QMU north-bound on the A1.
 10. It is entirely reasonable, therefore, for the capital receipts from house completions elsewhere in the MH1 allocation, as intended by the current wording, to fund the completion of the A1 junction in the short term, to ensure that the only remaining employment land in the vicinity of QMU is delivered timeously. In the absence of such a trigger, there is no guarantee that the new junction will be completed until the housing it is directly to serve (the 55 hectares of land referred to under QMU’s suggested PROP MH1b above) is constructed and occupied. Unfortunately, as explained below, the evidence suggests that this could be more than 15 years away.
 11. Technical Report 1 (page 51) accompanying the Proposed Plan programmes a total of 450 houses in the 2017/18-2023/24 period across the overall MH1 site, representing just 75 completions per annum on average. A planning application was submitted in 2015 for 473 houses at the 15 hectare (former employment) site east of QMU, and there is every expectation, therefore that this will be the first phase of development, until at least 2024. Thereafter the 21 hectare site at Old Craighall, also accessed off the existing road network, is likely to be the subsequent phase, and assuming this could accommodate some 500 houses, the programming in the Technical Note anticipates that this will be complete in or around 2030/31. Following completion of this phase, the 55 hectare site to be serviced by the A1 upgraded junction may come forward.
 12. The proposed trigger for the completion of the QMU junction on the A1, the completion of 100 houses on the overall MH1 allocated site, is linked to the programmed completion rate included in LDP Technical Report 1 (which was presumably discussed and agreed with the relevant housebuilders). As referred to above, this is 75 dwellings per annum. On the assumption that housing commences in 2018, this would necessitate the completion of the junction by 2020. This is some three years away, and QMU considers this to be a reasonable target timescale.

13. In the absence of a trigger for the completion of the A1 junction in line with that outlined in the revised PROP MH1c above, it is possible that the junction may not be completed until post-2031. **This timescale would block any potential to see the delivery of the QMU Commercial Hub and the Edinburgh Innovation Park**, as outlined in the Masterplan and Delivery Strategy accompanying this Representation. The completion of the A1 junction to full grade-separated status is fundamental to the commercial viability of the Commercial Hub and Innovation Park.
14. The number of houses proposed within the overall MH1 allocation has increased from 700 (in the draft Proposed Plan of November 2015) to 1,500, and the amount of employment land has reduced from 79 hectares to 41 hectares.
15. In addition to the amendment outlined above to PROP MH1, QMU **objects** to the MH1 Development Brief included as draft Supplementary Planning Guidance with the Proposed Plan in its current form, as it should be amended to take account of the revisions outlined above. In particular, the MH1 Development Brief requires the following revisions:
 - The removal of any reference to a “town centre” at Old Craighall. The QMU Commercial Hub has been promoted for a number of years, in consultation with ELC, as the local centre to serve the expanding population at Craighall, centred on the established and proposed facilities at QMU. This will bring the greatest benefit for both the existing community at Stoneybank and the new community at Craighall. Proposing a new town centre at Old Craighall is contradictory to the aims of the QMU Commercial Hub to meet the requirements of the existing and new communities, as well as those of the University and proposed Innovation Park, as outlined in the MDS.
 - The relocated QMU car park should be illustrated on land to the north-east of the University, together with the proposed housing in this location, and referred to as MH1a on the Proposals Map.
 - The text associated with MH1 should delete reference to “a new village centre” in point 1 and elsewhere within the text.
 - Reference to the A1 QMU grade-separated junction within the timeframe outlined in the amended PROP MH1c above should be referred to at point 10 of the Development Brief text.
 - The Development Brief and text should ensure that the details included within the Masterplan and Delivery Strategy accompanying this representation are fully reflected in the Development Brief and associated text. References to the Commercial Hub and Innovation Park are currently minimal.

PROP T16: A1 Junction Improvements at Queen Margaret Drive Interchange

16. Consistent with the QMU objection to MH1 above, QMU **objects** to the current wording of PROP T16, which fails to include any meaningful delivery timescale for the completion of the A1 junction. The proposal should be amended to include the trigger for the completion and opening of the new junction as outlined in the revised MH1c above.
17. In addition, the reference to connecting the land at Craighall to Musselburgh “*in combination with PROP T22*” should be deleted, for the reasons outlined below. Aside from these reasons, linking the delivery of the

upgraded A1 junction at QMU to a proposal that merely requires the investigation of a proposal for the Mucklets Bridge is plainly unacceptable in a LDP proposal.

PROP T22: Reopen link to Vehicle Access at Queen Margaret Drive/Whitehill Farm Road

18. The LDP includes a proposal to consider re-opening the link over the Mucklets Road bridge (between Queen Margaret Drive and Whitehill Farm Road) to all vehicular traffic. As with the QMU comments in relation to MH1 above, the proposal is worded imprecisely, rendering it largely meaningless. Notwithstanding this, and for the avoidance of doubt, QMU **objects** to any proposal to reopen this link to any traffic other than pedestrians and buses, as originally intended when the QMU development was approved.
19. Given its scale, the QMU campus at Craighall presented a number of challenges, not least the impact on the transportation network from the University population. Sustainable transport solutions were a key consideration, as was minimisation of impact on the environment and the local communities. The strategy adopted was to focus vehicular use on the existing trunk road network and to create a new junction on the A1. Along with this was a requirement to ensure that private vehicular access was not available from Mucklets Road, to avoid a through route/"rat run".
20. A controlled parking zone was created adjacent the University to protect the area from staff and student parking. This was part funded by the University. Mucklets Bridge had never previously been used to access the campus area, and the planning permission for the QMU campus included a planning condition restricting access, enforced by the inclusion of a regulated bus barrier. The structural suitability of the bridge was assessed and although it could only provide one way traffic flow it was considered safe for use by pedestrians and public transport. Alterations were carried out to ensure safe separation.
21. Although Mucklets Bridge has operated in this manner since the opening of the QMU campus in 2007, its use has increased significantly with the increase in local bus services, largely as a result of University passengers. Recent surveys conducted by QMU suggest that the bridge is at peak capacity.
22. The PROP T22 proposal to consider opening the Mucklets Bridge for vehicular traffic was not discussed with QMU or its consultants in advance of its inclusion in the Proposed Plan. It is a significant divergence from previous strategy and presents a number of challenges and risks to the QMU, as follows: -
 - Cost to upgrade – use for anything other than current uses would require an additional or replacement bridge to be built. T22 is included in the Proposed Plan without any consultation with the main stakeholders, or any understanding of cost. Rather than include an imprecise reference to investigation of the possibility, ELC should have consulted earlier with QMU to allow the implications to be fully understood. Such investigation and consultation should now take place as part of the next LDP, not the current one.
 - Public objection - opening the bridge for private transport would create a rat run, would be unpopular with the local community and would increase the likelihood of objections to any development plans. This is as was evidenced via the University PPP consultation process with the bridge and parking being the core concerns of the local community.
 - Transport Strategy – the transport strategy for the QMU MDS is founded upon its links to public transport, active travel and sustainable transport modes. The strategy considers the links to Newcraighall, the A1

and Musselburgh for all transport modes and does not require the opening of Mucklets Bridge to general traffic to fulfill the objectives in the strategy.

- Level of use – the Mucklets Bridge is a heavily used pedestrian, cyclist and public transport link with approx. 240 buses per day. It is a vital link on the National Cycle Route N1 with extensive cycle usage, and reopening the Bridge would reduce the attractiveness of the route to cyclists and increase risk with interaction with potentially high traffic volumes.
- Green Travel Plan – The University currently has a working Green Travel Plan which has successfully reduced single occupancy car trips to the university each year for the past 6 years. A main contributor to this is the accessibility of public transport, provision of the bus barrier on Mucklets Bridge and a parking management system.
- QMU parking in station car park – QMU has in the past and continues to experience students utilising the rail station car park to access the university. The university endeavours to continue working with the British Transport Police to reduce this however should Mucklets Bridge be open to general traffic, this could make parking in the rail station a more attractive option, causing significant implications for rail users.
- Impact of more vehicles on the bridge traffic - the bridge currently requires extensive ongoing maintenance due to the number of buses causing significant rutting, pot holing and general surface wearing of the pavement surface, adding further vehicles to this would result in a more durable surface course required. As previously stated the impact on the local community and public transport times would be severe.

Response ID ANON-ZMS3-3MPS-G

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

Submitted on **2016-11-06 20:49:04**

About You

1 What is your name?

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

Other

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

Organisation:

Queen Margaret University c/o Scott Hobbs Planning

Your role:

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

Section 1 - Introduction (pages 1-10)

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

Modification(s) sought::

See attached Representation

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

Justification for Modification(s):

See attached Representation

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

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

Modifications(s) sought:

See attached Representation

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

Justification for Modification(s):

See attached Representation

Section 2a - Musselburgh Cluster Strategy Map (pg 15)

1a Strategy Map for Musselburgh Cluster - what modifications do you wish to see made to the Strategy Map for the Musselburgh Cluster in the proposed Plan? Your justification for this will be sought in the next question.

Modifications(s) Sought:

See attached Representation

1b Strategy Map for Musselburgh - Please give any information/reasons in support of each modification suggested to the Strategy Map for Musselburgh in the proposed Plan.

Justification for Modification(s):

See attached Representation

Section 2a - Introduction to Musselburgh Cluster (pg 16)

1a Introduction to Musselburgh Cluster - what modifications do you wish to see made to the Introduction of the Musselburgh 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:

See attached Representation

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

Justification for Modification(s):

See attached Representation

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

1a PROP MH1: Land at Craighall, Musselburgh - what modifications do you wish to see made to Prop MH1 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

See attached Representation

1b Please give any information/reasons in support of each modification suggested to Prop MH1 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

See attached Representation

2a PROP MH2 - Land at Old Craighall Village - What modifications do you wish to see made to Prop MH2 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

2b Please give any information/reasons in support of each modification suggested to MH2: Land at Old Craighall Village of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

3a PROP MH3 Land at Old Craighall Junction South West, Musselburgh - What modifications do you wish to see made to Prop MH3 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

3b Please give any information/reasons in support of each modification suggested to Prop MH3 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

4a PROP MH4: Land at Old Craighall Junction, Musselburgh - What modifications do you wish to see made to Prop MH4 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

4b Please give any information/reasons in support of each modification suggested to Prop MH4 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

5a PROP MH5: former Edenhall Hospital Site, Musselburgh - What modifications do you wish to see made to Prop MH5 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

5b Please give any information/reasons in support of each modification suggested to Prop MH5 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

6a PROP MH6: Pinkie Mains, Musselburgh - What modifications do you wish to see made to Prop MH6 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

6b Please give any information/reasons in support of each modification suggested to Prop MH6 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

7a PROP MH7: Pinkie Mains, Musselburgh (Intensification) - What modifications do you wish to see made to Prop MH7 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

7b Please give any information/reasons in support of each modification suggested to Prop MH7 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

8a PROP MH8: Levenhall, Musselburgh - What modifications do you wish to see made to Prop MH8 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

8b Please give any information/reasons in support of each modification suggested to Prop MH8 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

9a PROP MH9: Land at Wallyford - What modifications do you wish to see made to Prop MH9 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

9b Please give any information/reasons in support of each modification suggested to Prop MH9 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

10a PROP MH10: Land at Dolphingstone - What modifications do you wish to see made to Prop MH10 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

10b Please give any information/reasons in support of each modification suggested to Prop MH10 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

11a PROP MH11: New Secondary School Establishment, Musselburgh - What modifications do you wish to see made to Prop MH11 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

11b Please give any information/reasons in support of each modification suggested to Prop MH11 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

12a PROP MH12: Barbachlaw, Wallyford - What modifications do you wish to see made to Prop MH12 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

12b Please give any information/reasons in support of each modification suggested to Prop MH12 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

13a PROP MH13: Land at Howe Mire, Wallyford - What modifications do you wish to see made to Prop MH13 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

13b Please give any information/reasons in support of each modification suggested to Prop MH13 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

14a PROP MH14: Land at Whitecraig South - What modifications do you wish to see made to Prop MH14 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

14b Please give any information/reasons in support of each modification suggested to Prop MH14 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

15a PROP MH15: Land at Whitecraig North - What modifications do you wish to see made to Prop MH15 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

15b Please give any information/reasons in support of each modification suggested to Prop MH15 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

16a PROP MH16: Whitecraig Primary School Expansion Land - What modifications do you wish to see made to Prop MH16 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

16b Please give any information/reasons in support of each modification suggested to Prop MH16 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

17a Policy MH17: Development Briefs - What modifications do you wish to see made to Policy MH17 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

See attached Representation

17b Please give any information/reasons in support of each modification suggested to Policy MH17 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

See attached Representation

18a PROP MH18: Levenhall links to Prestonpans: Area for Habitat Improvement - What modifications do you wish to see made to Prop MH18 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

18b Please give any information/reasons in support of each modification suggested to Prop MH18 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

Additional Information :

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

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

3a Maintaining an Adequate Effective Five-Year Housing Land Supply - What modifications do you wish to see made to the Maintaining an adequate Effective Five-Year Housing Land Supply section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

3b Please give any information/reasons in support of each modification suggested to the Maintaining an Adequate Five-Year Housing Land Supply section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

5b Please give any information/reasons in support of each modification suggested to the Specialist Housing Provision & Other Specific Needs section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

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

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

Modifications(s) Sought:

See attached Representation

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

Justification for Modification(s) :

See attached Representation

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

Proposals Map

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

Modifications(s) Sought:

See attached Representation

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

Justification for Modification(s) :

See attached Representation

Visual Upload:

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Visual Upload:

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From:
To: [Local Development Plan](#)
Subject: Local Development Plan
Date: 06 November 2016 16:28:40

I wish to make the following comments re. LDP.

In general I am appalled at the rate and extent of the current construction projects and future proposed projects particularly in the west of the county.

East Lothian used to be known as the Garden County of Scotland. It is a county of great beauty - wonderful coast with beaches, rocky outcrops and cliffs, fertile agricultural plain, attractive villages and small towns, woods and hills. It also has a diverse and in places threatened ecosystem.

Much of this, especially in the west, is being concreted over. Yes, there are provisions for manicured green patches within developments but that is just what they are.

From Musselburgh inland east to Macmerry and coastal to Longniddry is destined to simply be part of Greater Edinburgh.

Indeed this is a premise which is quite clearly made in the plan - section 4.3 1 page 29 - states East Lothian is part of the wider city region and has a significant role to play in accommodating and providing for the city region.

I do not support this premise.

Given that -

The current expansion of the Wallyford area is well underway and cannot be halted.

Blindwells 1 looks set in stone.

As noted above, there will be a concrete carpet all the way out to Macmerry (note the housing proposals for Kingslaw and Adniston) and Longniddry.

I reject the idea of any further large scale developments whether dispersed or compact.

Specifically, I object to the proposed 'safeguarded' Blindwells 2 expansion.

This is an area of class 1 agricultural land. It is an area which is increasingly becoming popular for walkers, runners and cyclists for those working and living in the locality. Witness the numbers who come out onto the paths at lunch times. The bird life is wonderfully rich especially when the summer migrants arrive but also very fragile. I am not a botanist but I am sure the same applies to plant life.

Obviously, from my general comments above, I object to any further concrete carpeting.

I realise that the LDP covers many issues but they are all many resulting from pressures from Edinburgh.

East Lothian councillors and planners need to respect the integrity of their county and not concede any more to the land grabbing hands of Edinburgh and its developers.

Eve Ryan,

Representation in response to the publication of East Lothian proposed Local Development plan 2016 & the associated Environmental report 2016.

Introduction

I write in response to the publication of the East Lothian proposed Local Development plan 2016 and its associated environmental report 2016.

The following comments and questions have specific regard to the DR8 Housing Proposal: Pencraig Hill, East Linton and DR9 also located in East Linton. However, some of the comments and questions have a general applicability to the documents as a whole.

I have grouped my main issues of concern into six topics so as to provide clarity for the persons considering them.

1) Flooding

East Lothian proposed Local Development plan 2016; Page 46 section 2.133

The paragraph acknowledges that ground condition constraints will need to be addressed and mitigation provided. However, SEPA interim position statement on planning and flooding – July 2009 paragraph 12 states: *“Development plans and action programmes should spell out how unavoidable impacts will be mitigated and delivered.”*; therefore I would have expected that these constraints be addressed and mitigated in this document in detail. Later in the development plan (page 129 - 131 SuDs & Flood Risk) reference is made to SuDs areas and their design criteria being required within planning applications but this is not “spelling out” how unavoidable impacts will be mitigated and delivered specific to this location.

I would like to bring to your attention the example of the Andrew Meikle Grove SuDs area. This area was developed as per the requirements of the planning application. I and a number of other residents of Andrew Meikle Grove were led to believe that Scottish Water would accept full responsibility for the SuDs area from the developers after the construction phase of the development was complete. However, it transpires that this was by no means a foregone conclusion and residents now face being potentially left with the responsibility instead. Without Scottish Water accepting responsibility for such a large SuDs area, how can ongoing upkeep be responsibly ensured? If a similar situation were to develop with regards the DR8 Pencraig hill site, the existing developments ‘down slope’ would be at the mercy of the developers and residents commitment to responsibly maintain their SuDs area. I would appreciate clear commitment and planning outlined within the development plan on the part of East Lothian Council to ensure a clear path of responsibility and accountability for any potential SuDs during any construction and occupancy phases of the DR8 Pencraig hill site. Unfortunately for the residents of Andrew Meikle Grove, planning of the SuDs area was fully addressed by the planning department, but the ongoing use and upkeep were not considered. I would like to see guarantees within the development plan that this situation will not happen again.

East Lothian proposed Local Development plan 2016; Page 48 section 2.144

It states of the DR8 Pencraig hill land that: “A Flood Risk Assessment will be necessary”. SEPA interim position statement on planning and flooding – July 2009 paragraph 13 states: *“We will strongly encourage planning authorities to use Strategic Flood Risk Assessment (SFRA) as a practical tool to help deliver real change in managing flood risk early on in the development plan process.”*; therefore I would have expected it to form part of this document. However I have been unable to find this within

the development plan or the environmental report, perhaps it is part of another existing document. I recommend it be added as an appendix to the environmental report.

East Lothian proposed Local Development plan 2016; Page 131 **Flood risk**

Policy NH11: Flood Risk particularly issues d), h), i) & j)

Circa 100 homes on DR8 Pencraig hill would particularly affect the existing developments Eastwards and 'downslope' of the area (Andrew Meikle Grove & Orchardfield). The topsoil here is approximately 1' deep (and in some areas considerably less), thereunder is predominantly clay which has poor natural draining qualities. The proposed DR8 site development would result in the disruption of the natural land drainage which has been built up over more than 100 years of use as farm land. There have been several instances this summer of localized flooding due to heavy rainfall on the Andrew Meikle Grove development. During the past two winters, an area adjacent to the railway underpass has been under near constant flood. Thankfully to my knowledge this flooding has not yet led to water damage within properties. I can attest though that I found it necessary to use a submersible pump during one particularly heavy rain shower to move water away from the rear of my property within the development on the border of the proposed DR8 site (please see the below photograph). Further development 'up slope' of the existing developments will only serve to exacerbate the flooding problems.



Flooding to the rear of my property

The SEPA flood map of the East Linton area records an area categorized as High risk 'down slope' of the DR8 Pencraig hill area. Indeed, there are several High risk areas in close proximity to the DR8 location. Is the DR8 location sited appropriately given that by the development plans own statement on page 131 section 6.31 *"The Council promotes a precautionary approach to flood risk from all sources through avoidance as a first principle"*? One of the previously mentioned High risk areas identified on the SEPA flood map is adjacent to the railway embankment. Surely this safety hazard should be eliminated before any further development with the potential to increase the level of flooding is considered?

East Lothian proposed local development plan environmental report 2016 appendix 9; page 59 SEA

The water impact assessment does not appear to take into account the adjacent areas to the proposed DR8 site otherwise it would make mention of the High risk areas in close proximity. I request a review of this element of the assessment.

Drainage may be expected to be at its most vulnerable during the construction phase of any future development. I would seek assurance within this development plan that flood mitigation would have to be implemented prior to all other construction phases on the DR8 Pencraig hill site.

2) Education

East Lothian proposed Local Development plan 2016; Page 79 Section 3.101 to 3.105

These sections make no specific mention of East Linton Primary school, in fact 3.103 states *“Generally, the housing land allocations in the catchment areas of the smaller schools will help to sustain their pupil rolls.”*

Below I list the last five East Lothian Council pupil census results for East Linton primary school

2015-2016: 183

2014-2015: 178

2013-2014: 161

2012-2013: 165

2011-2012: 159

If we take an average of the pupil roll from 2011-2014 we have a roll of 162 pupils and growing.

If we take an average of the pupil roll from 2014-2016 we have a roll of 181 pupils and growing.

Andrew Meikle Grove numbers 50 homes and was broadly speaking gradually occupied between 2014-2015.

As the Andrew Meikle Grove development was by far the most significant development in the East Linton primary school catchment area between 2014-2016 it can be argued that the construction of 50 homes along with the background annual average of separate developments increased the school roll by an average of 19 pupils.

The development of circa 100 homes on the DR8 Pencraig hill in conjunction with the background annual average of separate developments may then be expected to increase the school roll again by 38 pupils.

If we add the expected increase in roll (38) to the current previous 2 year average (181) we have a roll of 219 and growing.

According to the East Lothian Council under the FOI Ref: 2014/340(6202) the East Linton Primary school capacity is 208.

The development of circa 100 homes on the DR8 Pencraig hill can be expected to push the East Linton primary school overcapacity by more than 5% in the first year following occupancy alone.

From these figures it is clear that in contradiction to the statement in paragraph 3.103 *“Generally, the housing land allocations in the catchment areas of the smaller schools will help to sustain their pupil rolls.”* East Linton primary school currently has a growing pupil roll which does not require extra numbers to sustain it, indeed the increase in pupil roll from circa 100 homes would push the school over capacity.

Surely the East Lothian proposed Local Development plan 2016 should mitigate against this expected overcapacity of East Linton primary school specifically. I request a commitment by the council to expand and upgrade the East Linton primary school to ‘future proof’ against the growing population of East Linton prior to any further development. Alternatively I recommend the development plan reduce the number of homes allocated to the DR8 site to 30. This number of homes will not push the primary school over capacity.

3) Infrastructure

East Lothian proposed Local Development plan 2016; Page 93 section 4.22

This section makes no mention of car parking for the future station at East Linton. It would be appreciated if a minimum number of parking spaces were named in the proposed LDP.

4) Loss of Agricultural land

East Lothian proposed Local Development plan 2016; Page 128 section 6.19

This section states: *"Prime agricultural land is the most versatile land for food production, and is a nonrenewable resource. The Council aims to reduce adverse impacts on soils, avoid where possible development on prime agricultural land"*.

East Lothian proposed local development plan environmental report 2016 appendix 9; page 59 SEA

The soil impact assessment identifies the site as being class 3.1 prime agricultural land.

I suggest that the DR8 Pencraig hill site is not appropriate for development as it would result in the loss of this prime agricultural land.

5) Housing Density

East Lothian proposed Local Development plan 2016; Page 137 section 7.7

The paragraph states *"New development will be expected to integrate with the existing urban form, street pattern, and the plots sizes, building lines, and the form, scale and massing of development in the local area"*. The proposed DR8 Pencraig hill site has been identified for circa 100 homes. The most recent development in the area is Andrew Meikle Grove consisting of 50 homes set in around 4.5 hectares and is located adjacent to the proposed DR8 site. The Andrew Meikle Grove development is only marginally smaller than the DR8 site which is around 1 hectare larger. Doubling the housing density on the DR8 site is in direct contradiction to section 7.7. The proposed circa 100 homes would not be in keeping with the area, a more appropriate number in keeping with existing urban form, plot sizes, scale and massing would be 62 homes.

6) Character and setting of East Linton

East Lothian Main Issues Report 2014; page 137 section 6.76

Table 22 states of East Linton *"...any further housing development here would have to take account of the sensitive landscape setting of the historic village.....Recent housing allocations have sought to contain the settlement within this landscape feature and additional growth may undermine this characteristic of the settlement.....Any encroachment on to higher land to the north, south and west would not be supported. However there may be limited scope for additional housing development without significantly compromising the character and setting of the settlement if it were to expand to the east"*.

East Lothian proposed local development plan environmental report 2016 appendix 9; page 59 SEA

The Landscape impact assessment incorrectly states that there is a tree belt on the Eastern boundary of the proposed DR8 site which screens the adjacent housing development. This tree belt is very far from being established and currently consists of some thinly planted saplings of an average height of two feet which are struggling to survive. The 'tree belt' does nothing to screen the landscape impact a development on DR8 would have. I am struggling to understand how it can possibly be claimed in the SEA that the Landscape impact is only classified as 'some' when it can be nothing but 'significant'. I would bring into question the accuracy of the environmental report regarding this site and request it be revised.

The proposed DR8 Pencraig hill site location would undermine the character and setting of the village as it is located on higher ground to the West of the village. There is no visual screening of the proposed site from the established Orchardfield development. The environmental report of the DR8 site identifies the impact of development as generally 'some' to 'significant'. The section regarding potential impact of the development is generally 'significant'. As the MIR states, perhaps a better location for housing development would be to the East of the village.

Conclusion

I would like to thank you for your consideration of my comments and questions and look forward to your response and reassurances.

Magnus Thorne

Contact details

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Policy & Projects

Development

Partnerships & Services for Communities

East Lothian Council

John Muir House

Haddington

EH41 3HA

6.11.16

Dear Sirs,

WRITTEN REPRESENTATION SUBMISSION IN RELATION TO THE PROPOSED EAST Lothian LOCAL DEVELOPMENT PLAN

We have been formally instructed to write on behalf of our client group GOOD '*Gullane Opposing Over Development*' in order to make written representations to the proposed East Lothian Local Development Plan.

The Nature of the Objector making these Written Representations

GOOD is a constituted campaign group formed in May 2015 by Gullane residents. The purpose of the group is that it provides a cohesive way for residents to share information, research, knowledge and findings in order to enable the community to engage constructively and effectively with the local planning process.

The initial attempts by the community to actively engage in the LDP process had been with the staff and elected members of East Lothian Council in the preparation of the Main Issues Report of the East Lothian Local Development Plan.

Since that time and in order to be representative of the village GOOD have canvassed the whole village and have met regularly with large groups of residents in order to establish their opinions on the future of their settlement relating to transport, infrastructure, service provision, development opportunities, committed sites, conservation tensions, recreation, special qualities of the place, pressure for development and quality of life.

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The data gathered at these meetings and consultations has been used to inform discussions on the community's view as to how the settlement should be reflected in the LDP and respond accordingly to the planning process.

The Planning System

The plan led system embedded in the Town and Country Planning (Scotland) Act 1997 (as amended) is at the root of the issue that the residents of Gullane have embraced in engaging positively with the planning process.

They note that a developer has sought to gain leverage in the plan process by submitting two planning applications post main issues/ pre-proposed plan stage in Gullane for greenfield sites.

Reflecting on this, it is very much felt in the community that both the council and the developer sought to skip stages of the development plan process and push these sites to a conclusion without due consideration through the LDP process and all that has gone before in the SDP.

The lack of consideration of a sequential, properly planned approach to the expansion of Gullane sitting within the North Berwick Cluster area is of extreme concern. The motivation for such a high percentage of expansion in one settlement is not conveyed in any of the council's documents.

The Reporter is respectfully requested to examine the strategy in relation to that which is set out in the strategic development plan and to assess the Gullane proposed expansion in relation to other criteria in relation to desirability and effectiveness of sites eg access to educational and health facilities, access to public transport and range and choice of sites available for example brownfield before greenfield.

An Effective Housing Land Supply

The Council's Housing Land Supply: Interim Planning Guidance dated 23.2.16 looks to clarify matters in relation to the issues of the non-statutory nature of the draft proposed plan stage in the process that has been introduced here, it also goes on to give some guidance on the matter of prematurity and prejudice; and where there are matters of contention. The Reporter is asked to consider that also in reviewing the housing strategy in East Lothian.

What the council does not explain in any level of detail is the reason behind the shortfall in relation to effective sites within the land supply yet it readily accepts that there is a shortfall in effective sites. GOOD question this assumption as a starting point and request that the

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Reporter seek detailed survey information from the council in relation to the assessment of effectiveness of sites and assumptions regarding shortfalls.

It has also been assumed in that document that the Gullane sites promoted by a developer as those presented in the applications submitted to the council in recent months would represent effective sites that could potentially plug this gap, hence their inclusion by the council; a matter we will go on to cover later in this document – this method seeks to short circuit the plan system and examination in public.

The East Lothian community rightfully require an explanation from the council and a rigorous assessment of the reasons, which are hinted at in the document, as to why sites previously allocated within the land supply are now, post-recession, considered ineffective. The matter appears to be wholly guided by the preferences of developers as opposed to good planning for the area. This approach is highly questionable.

The Proposed Plan commits to ensure sufficient housing land is available as per SESplan's figures for East Lothian it states *'land capable of delivering 10,050 homes will be needed up to 2024, with an interim requirement for land capable of delivering 6,250 homes up to 2019. An adequate five year effective housing land supply is to be maintained at all times.'* It also seeks to support existing established housing land supply which includes all allocations from previous plans.

It advises that the shortfall between the existing housing land supply and what is required, forms the basis for the new land allocations within the LDP (also taking into consideration start date and rate of development anticipated for new housing land allocation at point of adoption).

We note that it is stated that the overall capacity of sites in the LDP is in *"excess of 10,050"* to *"take account of the amount of development that could take place within the plan periods"*. It also states that a *"generous supply"* will be provided and maintained so that SDP requirements can be met in line with Scottish Planning Policy.

The Strategic Development Plan directs the majority of new housing land to the main settlements in West of the district. However, it also states that it recognises need for new homes in the East. It advises *"The SDA is prioritised as the location for new housing, but a range and choice of smaller site allocations are made outside the SDA"*. However, this isn't the case upon examination of the percentage of development expansion being suggested in Gullane, which lies within the North Berwick cluster, and not within the SDA in the west of the district. The number of new housing units proposed in Gullane on greenfield sites is nigh on 300 new units plus 100 on a brownfield site – the former fire training site. The Reporter

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is asked to interrogate this strategy which appears to correspond more to profitability and desirability of sites by developers than to effectiveness and proper planning.

Noting that the Proposed LDP advises:

2.3 The spatial strategy is a compact one, as it focuses the majority of new development in the west of East Lothian. This is where the best opportunities are to locate new housing and economic development in the most accessible part of the area. Appropriate development sites that are or can be integrated with sustainable transport options are allocated. This is so new development will have good access via sustainable transport modes to existing or new employment locations or community facilities that are or will become available locally and regionally. This will help minimise the need to travel by car as well as travel distances and associated CO2 emissions.....Some additional development has been distributed further east. This is in recognition of the need and demand for new homes and economic development opportunities in other appropriate and accessible parts of East Lothian where local service provision and sustainable transport options are good.

The proposed plan also advises there is very little on brownfield development as a priority for development; however its Objectives and Outcomes are to *“To make efficient use of land, buildings and infrastructure, prioritising the development of previously developed land over greenfield land where appropriate, while recognising that the nature of East Lothian and the scale of strategic development requirements will likely require significant amounts of greenfield land, including prime quality agricultural land, to be used;”* In Gullane, a sequential approach can and should be adopted with the significant expansion realised first on the brownfield site.

Looking at the breakdown of new land allocations in East Lothian

Musselburgh Cluster – 5,300 (West)

Dunbar 1,500 (East)

PrestonPans Cluster – 650 (West)

North Berwick Cluster 1,300 (East)

Blindwells – 1,600 (West)

Tranent Cluster – 1,500 (West)

Haddington – 1,700 (Central)

The Reporter is asked to interrogate the 1300 homes to be built outside Strategic Development Area in North Berwick Cluster and question why such a large proportion are to be built in this area.

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The development of the edge of settlement Gullane sites NK7, NK8 and NK9 and the overall growth proposed for Gullane is in direct conflict with SESplan, the strategic development plan. SESplan has defined a Strategic Development Area (SDA) for East Lothian and requires that Local Development Plans MUST prioritise the SDA as the area in which to find and allocate new housing land. The significant growth proposed in the LDP, on greenfield land, outwith the SDA is in conflict with the SESplan. SESplan requires a sequential approach to identifying land allocation for housing with the preferred area of growth being to the west of the SDA and then a more dispersed approach towards the East of SDA corridor. The percentage growth of Gullane as a settlement does not represent a dispersed approach.

In Para 26 of the SESplan it states that planning authorities should – “give priority to the development of brownfield land and to land within the thirteen SDAs.” Clearly, this has not been the approach in East Lothian.

Para 113 of SESplan is consistent in approach with Scottish Planning Policy and with *‘achieving sustainable development, priority in allocating new sites for housing development should be given to brownfield sites within existing built up areas. Where additional land is required, sites should first be sought within the 13 identified SDAs, as shown in Table 3, to assist in implementing this plan’s locational strategy. Each LDP will also identify where further land is to be allocated so that the scale of the additional housing requirement for that area, as confirmed in the supplementary guidance which is to be prepared, can be delivered.’*

Policy 7 of the SESplan does allow for greenfield sites to be identified outwith the SDA, however, it goes on to state that proposals promoted under SDP Policy 7 MUST be in keeping with the character and local area....and any infrastructure required as a result of the development must be committed or funded by the developer. SESplan clearly states that the area of North Berwick Cluster, within which Gullane sits, must NOT be a focus for additional strategic sites at this stage. The SDA should remain the priority.

SESplan Para 108 states that LDPs retain and focus on the delivery of established housing land....and in para 55 land allocations brought forward must not undermine the ability to develop existing housing allocations. In terms of housing land allocations, SESplan focuses on the importance of sustainable brownfield development, taking a sequential approach. In reality, in Gullane the redevelopment of the Fire Station site (planning permission granted) would constitute a significant development within the village in terms of size and impacts but in terms of principle - an acceptable brownfield development within the established settlement boundary of Gullane. This should be conveyed in the proposed LDP. A modification suggested is that a sequential approach to development within the village is adopted and until the Fire Station site is built out no other sites should come forward.

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In essence it would not be in the interests of good and proper planning to support a sensitive greenfield allocation before the redevelopment of the Fire Station site had been completed. By doing so a sustainable, sequential approach would be undertaken and impacts on local services, education and infrastructure can be examined, monitored and mitigated against. SESplan clearly states on page 17 that local planning authorities should: *Promote the development of urban brownfield land for appropriate uses.* In addition, the adopted East Lothian Local Plan strategy for housing growth promotes the development of brownfield land over that of greenfield development.

Suggested Modifications

Removal from this LDP of Sites NK7 Saltcoats, NK8 Fentoun Gait East and NK9 Fentoun Gait West.

Summary of Justification for the Modification of the Proposed Development Sites NK7 Saltcoats, NK8 Fentoun Gait East and NK9 Fentoun Gait West – site and settlement specific issues

In summary, there are a number of key arguments that GOOD would make in relation to the principle of development on the Gullane sites: Proposed Developments NK7, NK8 and NK9 in the proposed plan; first is one of prematurity – the developer seeks to force the hand of the planning authority in the preparation of the LDP – this runs contrary to national advice on engagement in the planning process and undermines the transparency of the process as well as public faith in it. The current applications should either be withdrawn or sisted until an adopted LDP is in place.

The proposals represent developments outwith the established confines of the village and within the countryside and a departure from the strategic development plan as the percentage growth proposed for Gullane is a departure from the Strategic Growth Area proposed in the SESplan. No material considerations have been put forward by the applicant to demonstrate that a contrary view should be taken that would allow the council to support this proposal. In addition, the point raised in the previous paragraph relating to the lack of demonstration of the need for a departure from the development plan process of allocating housing land has not been made by the council. The assumption of an ineffective supply must be proven before departing from the plan led system.

There are also a number of localised, detailed design arguments as to why the sites aren't suitable for development and the current applications should be refused. These relate to infrastructure, transport, education, service provision, village form & design, sustainability, amenity, permeability, visual distinctiveness and landscape character.

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The Principle of the Development

The government drive to boost the housing land supply in the local development plans, the encouragement of a comfortable level of expansion of housing unit numbers in each local authority area is not a development at any cost approach. It is clear that there is a rigorous set of policy and guidance documents in place at both local and national level – these are required to be addressed in this application. National, strategic and local planning policy each support the need for sustainable development in appropriate locations usually with a positive relationship to existing settlements. The planning process looks to well considered sites, where impacts are assessed and mitigated, adequate infrastructure provision is put in place and support of the local communities and elected representatives is gathered, an appropriate level of examination is held and the site forms part of a plan led approach. This hasn't been the case in Gullane.

GOOD notes that pressure for housing development in Gullane village is at this time considerable due to Gullane being a desirable place to live, an attractive village environment with outstanding world renowned golf courses, high land values and a commutable distance to Edinburgh. However, this is not a new phenomenon – it has always been the case and was certainly the case when the strategy for development in East Lothian was embedded in the strategic development plan. There is no adequate reason to depart from the strategic development plan. None has been conveyed by the Council.

Conflict with the Strategic Development Plan

The development of this site and the overall growth proposed for Gullane is in direct conflict with SESplan, the strategic development plan. SESplan defines a Strategic Development Area (SDA) for East Lothian. SESplan requires that Local Development Plans MUST prioritise the SDA as the area in which to find and allocate new housing land. The application site is outside the confines of the village, within the countryside and outside the SDA. SESplan requires a sequential approach to identifying land allocation for housing with the *Preferred* area of growth being to the west of the SDA and then a more dispersed approach towards the East of SDA corridor. Policy 7 of the SDP does allow for greenfield sites to be identified outwith the SDA, however, it goes on to state that *proposals promoted under SDP Policy 7 MUST be in keeping with the character and local area....and any infrastructure required as a result of the development must be committed or funded by the developer*. SESplan clearly states that the area of North Berwick Cluster, within which Gullane sits, must NOT be a focus for additional strategic sites at this stage. The SDA should remain the priority. Para 108 states *that LDP retain and focus on the delivery of established housing land....and para*

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55 land allocations brought forward must not undermine the ability to develop existing housing allocations.

In terms of housing land allocation, SESplan focuses on the importance of sustainable brownfield development, taking a sequential approach. In reality, the redevelopment of the Fire Station site (planning permission granted) in Gullane would constitute a significant development within the village in terms of impacts but in terms of principle - an acceptable brownfield development within the established settlement boundary of Gullane. It would not be in the interests of good planning to support a greenfield allocation before the redevelopment of the Fire Station site had been completed. By doing so a sustainable, sequential approach would be undertaken and impacts on local services, education and infrastructure can be examined, monitored and mitigated against. SESplan clearly states on page 17 that local planning authorities should: *Promote the development of urban brownfield land for appropriate uses.*

In addition, the adopted East Lothian Local Plan strategy for housing growth promotes the development of brownfield land over that of greenfield development stating on page 59: *Priority will be given to brownfield sites followed by greenfield land releases.*

Scottish Planning Policy 3 – Planning for Housing (SPP3) recognises that good housing in the right locations supports economic competitiveness, social justice, sustainable development and regeneration. It encourages the planning system to create quality residential environments, guide development to the right places and deliver an adequate supply of housing. We do not believe that this proposal to develop the land on the edges of Gullane at Fentoun Gait East and West and at Saltcoats Field are developments in the right locations and far from creating a *quality residential environment*, will conversely have an adverse impact on existing quality of the environment enjoyed within Gullane. Scottish Planning Policy (2014) states the policies and decisions should be guided by, *avoiding over development, protecting the amenity of new and existing developments...* (paras 27-29).

The Saltcoats Field site is described by MIR as *a preferred land release, subject to education capacity.* (Table 23 MIR) and further justification by the council in the MIR for identifying this particular piece of land are:-

Development of this land would allow for a logical southern expansion of the settlement, and potentially provision of expanded education and open space facilities. Development here would mirror the settlement pattern to the north of High Street, and provide new housing adjacent to the existing primary school (Table 23 MIR)

We consider however that MIR guidance does not take account of national, strategic or existing local plan policies in relation to housing allocation. As stated previously, it is

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evident that SESplan makes allowances for housing allocation land away from the west of the county, however the scale of the potential housing land allocation is believed not to be in accordance with existing statutory guidance. The MIR received considerable opposition at consultation stage and the concerns relating to scale, infrastructure and amenity do not appear to have been addressed by the council or the developer. It appears to be a case of the developer promoting a site and the council officers taking that and running with it as opposed to a well planned approach to the allocation of housing land following the plan for growth embedded in the strategic plan.

The allocation of land for housing within the North Berwick Cluster appears biased towards Gullane with only an additional 3 identified preferred sites for housing development in other locations within the cluster area (Tantallon Road, Castlemains and Aberlady West) which culminates in a further 230 homes. Gullane has been allocated a total of 290 units within the council's preferred locations.

It is considered that the housing allocation sites identified within the MIR over-estimate the capacity of a village the size of Gullane to cope with the rapid increase in population. Over the past 30 years Gullane has been expanding at a steady rate. However, these proposed developments could see a total growth of up to 30% of its current physical and population size with no provision for addressing the infrastructure implications of this degree of expansion. This does not represent good planning and is clearly a strategy born out of the significant push by developers with specific land holdings in the most desirable and profitable parts of East Lothian as opposed to the strategy of good, sound planning principles and reasoning adopted for the county in the strategic plan. This approach is highly questionable and part of the reasoning put forward to the Reporter as requiring to be interrogated.

Impact on the Amenity and Special Qualities of Gullane, a conservation village

It is considered that the proposal for the expansion of Gullane would have a number of significant negative impacts on the general level of amenity of Gullane which is a conservation village. These would be contrary to accepted planning policy and guidance.

The protection of existing settlements in the countryside and coastal locations, such as Gullane, is supported in the current East Lothian Local Plan (2008). In that plan it is advised that in terms of scale and design, *development must have regard to its nature and scale and must be integrated into the landscape and reflect its quality and place* and states *the proposal must have no significant adverse impact on nearby uses*. These are standard requirements which have not been considered in the proposals to allocate sites NK7, NK8 and NK9. We believe that the proposal fails to meet these policy standards and the development of this scale will give Gullane a highly suburban edge appearance and further

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detract from its individual character and uniqueness. Current Policy DP2 Design states that *development must be appropriate to its location in terms of the following - positioning, size, form, massing, proportion and scale and add to the sense of place*. For the reasons already stated, a new standard uniform housing development due to its scale, form and indicative type of layout suggested in the design statement will not contribute in a positive way to the sense of place of Gullane and should be resisted.

In addition, and an important consideration in the objection to the proposal, the westerly segment of Gullane settlement has a Conservation Designation – at certain points the site is within 200m of the most southerly boundary of the Gullane Conservation Area. With the close proximity in mind, the setting of the conservation area must be taken into account when considering the proposal.

Planning Authorities are actively encouraged and required to undertake conservation area appraisals. Government guidance states that this is to assist and inform owners and developers in preparing proposals and assist with decision making - it is important to note that there is no Conservation Area Appraisal for Gullane, therefore the proposal has not been assessed for its impact on the Conservation area on nearby land. Valid concerns which have emerged from the local community are the detrimental impact that the proposal will have on the Gullane Conservation Area in terms of the rapid increase in parking and road congestion in Gullane and the degradation of protected areas in general.

Scottish Planning Policy (2014) and Designing Places promote appropriately located developments that exhibit the six qualities of successful places; distinctive, safe and pleasant, easy to move around, welcoming, adaptable and resource efficient. The proposed East Lothian Local Development Plan - in respect of protecting and enhancing the East Lothian area's high quality environment and its special identity should *ensure that new development is located in such a way that it respects the character, appearance and amenity of the area, including its settlements and their settings and To ensure that the design of new development reflects the sense of place and identity of the local area, and is properly integrated with its surroundings in terms of movement as well as form and appearance, while contributing to wider sustainability and place making objectives*. As has been stated above we would strongly dispute that the development respects the character, appearance and amenity of the area.

Impact on the Local Infrastructure of Gullane

The impact of the expansion of Gullane on local infrastructure and how the village infrastructure will cope with the demands of such a rapid increase in population over a short timescale. Of particular concern is primary and secondary school capacity, the ability of

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local road network and junctions to accommodate so much extra traffic in one location in the village, the lack of adequate public transport to go some way to providing a green travel strategy, foul and surface drainage capacity and medical, surgery and emergency services ability to cope with such a rapid increase in population when services are at capacity at present. Each of these issues represents a material planning consideration in the determination of this application.

The proposed LDP seeks to ensure adequate infrastructure capacity and an appropriate use of resources and also must ensure that all new development is capable of being served by available infrastructure capacity, or that this will be provided to allow the development to take place, while maintaining appropriate levels of service. However the expansion of Gullane is highly questionable in this regard.

In terms of education facilities, our research as shown that North Berwick High is at 99% capacity, and although there is some expansion potential through the development of additional campus land, this expansion is to accommodate existing school numbers and not any perceived increases in numbers. In addition, the Council has no control over these expansion plans, although land is safeguarded within current local plan and will be continue to be in the new local plan. Gullane Primary School has very limited capacity with its current numbers "peaking" at 228 pupils in the August 2016 school roll.

The impact of increases in through traffic from a development of this size (mainly from Fenton Road) poses a main concern for existing residents in Gullane. Trip generation, adverse impact on the surrounding network, road safety, poor public transport service to accommodate increased population are the main issues that have been raised by the community at the pre-application stage of the proposal. The Transport Statement submitted to the council by the developer attempts to address concerns that have been raised. The report concluded that due to the sites location within *walking* and *cycling* distance of schools, local facilities, train station and bus stops that traffic generation within Gullane and the surround network would be minimal and hence is in keeping with local and national planning guidelines. However, that is far from a rigorous and robust assessment and fails to take into account the experience of residents at present. Anecdotal evidence tells us that the bus service is described by the local community as poor and there is no train station in Gullane. The nearest station - Drem Station is 5km away and already has inadequate parking spaces available for those using the service. The train service is already overcrowded with no further carriages planned by Scotrail. It also should be considered that contrary to the statement in the transport Report, most of Gullane's facilities are on located on the opposite end of the village, and would likely require a car journey from the development site to the local shops.

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Looking at the impact on Gullane Primary School, in particular, the residents of the village state that the development will have a significant impact on the school. The current site of Gullane Primary School was built in 1977. At that time the total school roll was around 100 children in 7 primary stages, there was no nursery then. In August 2016 the school roll was 228 children plus an additional 60 children in the nursery. Although some new classrooms have been added to the building, no additional communal learning spaces have been added since 1977. The school hall is the only shared space in the school and is a corridor connecting infant area and the nursery and the upper area. ELC have acknowledged that Gullane Primary School is at capacity. ELC also acknowledge that a new dedicated hall for PE is required, together with a general purpose room for 30 children and extra toilet facilities. It is clear that further development will only add to the pressures on the school facilities. ELC have advised that housing developers cannot be asked to fund educational facilities that are already required.

Recent housing developments in Gullane have resulted in an average of 1 primary school pupil per new build house (compared to ELC's base assumption of 0.356 primary pupils per house). It is of real concern that ELC's pupil projections for primary pupils generated per house built will be underestimated again in the course of this application by failing to look at local circumstances as opposed to national averages. Even a moderate underestimate could result in significant additional pressures on Gullane Primary School. The Reporter is asked to consider this point with reference to the local circumstances.

The impact of the proposed development on the local GP service will be significant. In Scotland 34% of GPs are aged 50 and over and therefore likely to retire within the next 10 years. Locally the situation is even more precarious with 10 of the 13 GPs working at Gullane Medical Practice or North Berwick Group Practice being within 10 years of retirement (including all full time male partners). The failure to recruit new GPs resulted last year in 5 GP partnerships in Lothian collapsing, including Eskbridge Medical Practice in Musselburgh. This has led to a GP service reliant on temporary locums. Our current GPs are already overstretched. Nearly 1 in 12 of all the 75-84 years olds in East Lothian are cared for by Gullane Medical Practice. Given the upcoming retirement of so many local GPs and unprecedented crisis in GP recruitment, the community questions whether it is sustainable to build so many houses in a village so overstretched in terms of services.

Given that there is no meaningful analysis of the acute impacts of the proposed sites on local services and infrastructure then this is clearly required to be done before a site can be supported and represents a key element of the effectiveness of sites. The community would also argue that as well as being premature in planning policy terms at present the sites do not represent effective sites for inclusion in the local development plan. The sites cannot be serviced by primary or secondary school places, a local GP or emergency services let alone

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the ability of the local road network to cope with the additional traffic demands. As such the sites clearly fail in being effective sites.

The degree of effectiveness must come into question once the full range of the impacts are quantified. The role of the planning process is to bring forward effective housing sites in the proposed plan, not those that will be stalled for years through inadequate infrastructure which requires to be paid for by the developer.

It is therefore respectfully suggested that a rigorous site by site assessment comparing this site to other sites within the northern sector of the proposed LDP will require to be undertaken before any commitment to these sites is given by the council or the Reporter. We also look forward to seeing a robust argument for the council departing from the strategic plan's growth strategy.

GOOD will maintain this objection until it is demonstrated that a sequential approach to the development of Gullane is brought forward; an acceptable rationale for the departure from the SESplan adopted strategy for growth and until the local impacts are addressed. The nature of those impacts until that time, renders sites proposed for development NK7, NK8 and NK9 ineffective. A sequential approach to the development of Gullane should be adopted with the building out of the Fire Station site before any future development is supported. The Council and the Reporter are respectfully requested to address these points. GOOD seeks the opportunity to be heard at any hearing or inquiry sessions relating to the LDP.

Yours sincerely

Suzanne C McIntosh BA(Hons)MRTPI Hon FRIAS

Director: Suzanne C McIntosh BA(Hons) MRTPI Hon FRIAS

From:
To: [Local Development Plan](#)
Subject: Proposed development at Letham Mains Expansion, Haddington (PROP HN2)
Date: 06 November 2016 18:10:57

D. Dickson
W. Lee

Dear Sirs,
We have 3 issues with the proposed development as follows:

Issue #1

We believe that the proposed development at Letham Mains to include the Expansion into the South West Field (PROP HN2) will create a development of unreasonable and disproportionate size. The original Letham Development HN1 has already increased in capacity from 750 houses to 876. In addition, there are now developments at the Dovecot and Gateside. The inclusion of the South West Field will create a huge disproportionate housing development on the West side of town creating significant imbalance in the flow of traffic and people. We believe that to provide a more balanced approach to housing developments in Haddington, other areas to the East of the town (eg OTH-H6 Amisfield) should be considered in preference to the South West Field.

Issue #2

We believe that not only should the character of the small holdings be preserved but the inhabitant's right to use their properties for the purposes they were originally created should also be respected and upheld. there are a large number of poultry and fowl (Geese, Peacocks, hens, ducks) which form part of our livelihood. These birds cause considerable noise and do so at unsocial hours. The build of a housing estate in such close proximity to us is not appropriate and we do not expect to be asked to compromise our chosen lifestyle or livelihood at our property, particularly given the original intended purpose of the area.

Issue #3

We believe that not enough consideration has been given to the wildlife in the area marked by this expansion. Grey Partridge (a red listed species), skylark and Barn Owl for example can regularly be found in the South West Field and are in desperate need of conservation, not destruction as would surely be the case if the field were developed for housing. This field should remain undeveloped to allow these animals a corridor to the Letham Burn and surrounding woodlands.

Yours faithfully

D Dickson
W Lee

Response ID ANON-ZMS3-3MPU-JSubmitted to **East Lothian Proposed Local Development Plan**Submitted on **2016-11-04 12:29:45****About You****1 What is your name?****First name:**

David

Surname:

Howel

2 What is your email address?**Email address:**

dhowel@clarendonpd.co.uk

3 Postal Address**Address:**Clarendon Planning & Development Ltd
5a Castle Terrace
Edinburgh**4 Please enter your postcode****Postcode:**

EH1 2DP

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

Developer/ agent/ landowner

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

Clarendon

Your role:

Consultant for Stewart Milne Homes

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

Object to non-inclusion of land at Galt Terrace/The Loan, Musselburgh as a proposed housing allocation within the Musselburgh Cluster Spatial Strategy.

Section 1 - Introduction (pages 1-10)**1a Introduction - what modifications do you wish to see made to the Introduction of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.**

Modification(s) sought::

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

Justification for Modification(s):

Section 2a - Musselburgh Cluster Strategy Map (pg 15)**1a Strategy Map for Musselburgh Cluster - what modifications do you wish to see made to the Strategy Map for the Musselburgh Cluster in the proposed Plan? Your justification for this will be sought in the next question.**

Modifications(s) Sought:

Add new site, Galt Terrace/The Loan, Musselburgh (LDP Environmental Report Site Assessment ref.MIR/MH/HSG133) for approximately 190 units.

1b Strategy Map for Musselburgh - Please give any information/reasons in support of each modification suggested to the Strategy Map for Musselburgh in the proposed Plan.**Justification for Modification(s):**

In terms of the Spatial Strategy for the Musselburgh Cluster, the LDP proposes significant growth for this area with fifteen land allocations for housing, mixed-use and employment sites. Of these allocations, this LDP supports new proposals for substantial expansion of Musselburgh to the south-west (Craighall), Wallyford (extending existing allocation) and Whitecraig (north and south). It is noted that the Craighall allocation (Ref.MH1 - 1500 homes plus mixed-use elements) in particular extends Musselburgh across the A1 and joins with Old Craighall, i.e. promotes coalescence.

The extension of existing allocations (1,544 homes) at Wallyford to both north-east and south-west (Ref.MH10 - 600 homes and MH13 - 170 homes) presents a considerable incursion into the Green Belt which is highly visible from the A1.

The major new allocations at Craighall and Wallyford (Howe Mire and Dolphingstone) were both rated negatively by the Council's own landscape assessment (LDP Environmental Report Appendix 5). The extended development area as illustrated on the Spatial Strategy map for Musselburgh demonstrates that any perception of separation between Musselburgh and Wallyford will be removed.

Overall, in order to accommodate the required growth, the LDP has endorsed planned coalescence (Musselburgh with Old Craighall and essentially with Wallyford).

LDP Paragraph 2.6 reiterates that the proposed spatial strategy will require amendment to green belt boundaries in the west of East Lothian, stating "the form and structure of settlements as well as the boundaries of the green belt will need to change to deliver new development in the most appropriate way."

In this respect, the proposed site at Galt Terrace / The Loan is located at the heart of the preferred growth area and the proposal would have a minor (not significant) impact upon Green Belt objectives, as set out in the Landscape and Visual Impact Appraisal undertaken and submitted as part of the current planning application (see Appendix A to supporting submission - CD).

Additional landscape information is currently being prepared as part of the current application with impact of development being assessed in greater detail (the proposed landscape framework is included within Appendix A). This demonstrates how the site could be integrated within both Musselburgh and Wallyford and improve greenspace connections and linkage and gateway place character at Wallyford rail station.

As detailed hereafter, East Lothian require additional short term housing sites. Given the Musselburgh cluster is within the western and most accessible part of the Strategic Development Area (Paragraph 2.14) and the proposed site adjoins Wallyford which is "well served by public transport" (Paragraph 2.17) with improvements proposed at Wallyford station, including car park expansions and platform lengthening (Paragraph 2.18) the proposal accords wholly with proposed LDP spatial strategy.

The pending planning application for the site (ref. 16/00118/PPM) includes full supporting information which, as noted, is currently being added to with additional landscape information. A copy of the supporting reports have been provided on CD (Appendix A) as appendices to this representation to demonstrate deliverability and suitability of the site for approximately 190 new homes.

As such, Stewart Milne Homes object to the non-inclusion of Galt Terrace / The Loan, Musselburgh as a proposed site within the Musselburgh Spatial Strategy and associated Table HOU1 and Inset Map 26 (Musselburgh) with revisions sought as per the following:

Proposal - Land at Galt Terrace/The Loan, Musselburgh. Capacity 190 homes with associated landscaping, amenity greenspace and SUDS features.

With regard to the site's current Green Belt status, Paragraph 5.17 notes that the purpose of the Green Belt in East Lothian is to maintain the setting, character and identity of Edinburgh and its neighbouring settlements, including Musselburgh, Wallyford and Whitecraig. However, as stated in Paragraph 5.18, the boundaries of the Green Belt require to be modified to accommodate the spatial strategy (including housing growth). Boundaries have therefore been amended within the Musselburgh Cluster as part of the Proposed LDP.

This representation objects to the inclusion of the proposed site at The Loan/Galt Terrace, Musselburgh within the defined Green Belt. As noted above, additional housing sites will be required to support the spatial strategy (and strategic housing requirements) and the over-riding housing requirement, aligned with the site's highly sustainable location, outweigh the site's current Green Belt designation.

In particular, the site has excellent public transport accessibility and, as noted in the LDP Main Issues Report (when assessing realignment of Green Belt boundaries) "if the coalescence of settlements would be a consequence, then this will only be supported if the advantages of the site in question clearly outweigh those of other sites and the resultant loss of settlement identity that would arise from its development" (LDP MIR).

Coalescence of Musselburgh and Wallyford has already occurred with the Wallyford Park and Ride facility and adjoining consented housing site (as illustrated on Figure 1 within the supporting document) joining the settlements to the east of the site. Further, the allocation of additional land at Pinkie Mains to the west of the proposed site has also added to overall perception of coalescence.

It is accepted that release of the proposed site would require a suitable design response in relation to new open space, landscape and boundary treatment. There would also be Green Network opportunities in terms of linkage to existing paths and providing greater greenspace connectivity.

Competing East Lothian Green Belt Release Locations

The Proposed LDP seeks to amend the existing Green Belt at several locations within the Musselburgh Cluster, including proposed housing sites at Craighall, Dolphingstone and Howe Mire.

The LDP Environmental Report (Appendix 5) assessments of these sites rates impact either red, amber or green in terms of negative to acceptable impact. The landscape impact is assessed as follows:

Craighall (Proposal MH1 - 1500 units): 'red' - significant impact on landscape. There are "long views across the site" and "open views across site...towards Mayfield ridge and Moorfoot Hills". The conclusion is that "development would have significant urbanising effects in a currently open landscape, particularly in views from the A1. Development of the whole site would also result in the physical coalescence of Musselburgh with Newcraighall (Edinburgh) and the planned Shawfair development in Midlothian." (LDP Emt Report Appendix 5, Page 27)

Dolphingstone (Proposal MH10 - 600 units): 'red' - significant impact on landscape. "The site is largely devoid of natural boundary features and is highly visible from the surrounding landscape and road network, including the A1 to the south, from which there are open views across the site towards Edinburgh and the Firth of Forth. The site is within the Edinburgh Green Belt and helps maintain the separation between Wallyford and Prestonpans, especially when seen in long distance views from higher land to the south such as around Fa'side and Tranent. The scale of development proposed would represent a significant encroachment into the Green Belt and may undermine its role in preventing coalescence." (LDP Emt Report Appendix 5, Page 76)

Howe Mire (Proposal MH13 - 170 units): 'red' - significant impact on landscape. "To the south of Victory Lane is a large open agricultural field. This field is clearly visible from Salter's Road to the east, where there are open long-distance views across it to Arthur's Seat and the Pentland hills. It is also visible in views from Crookston Road further west, looking east towards Fa'side Hill. This field has no particular landscape or topographical features to provide visual containment and its development would be visually prominent and represent a major intrusion into open countryside, affecting the landscape setting of Wallyford." (LDP Emt Report Appendix 5, Page 80-81)

This highlights that all three of these major housing sites were assessed by the Council as having significant landscape impact (including long range visibility and coalescence) but this impact was dismissed in allocating these sites.

The proposed site at Musselburgh, by contrast, is well contained from long range views towards the site and Musselburgh and Wallyford are already conjoined.

As further illustrated in response to the LDP Environmental Report Site Assessments , the proposed site compares favourably with proposed allocations and given the housing need and sustainability factors, the site should be excluded from the Green Belt designation.

Summary

PAN2/2010 criteria for assessing site effectiveness provide a test against which sites require to be gauged with land at Galt Terrace/The Loan, Musselburgh considered effective, being free of potential site constraints and able to deliver units within the plan period. Specifically:-

Ownership

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

Status: Effective

Physical

The Site Feasibility Desk Study contained within Appendix A outlines the suitability of the site for the proposed development with no insurmountable issues anticipated.

Status: Effective

Contamination

The site, given its greenfield arable nature, has been deemed to have a low risk of contamination.

Status: Effective

Deficit Funding

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

Status: Effective

Marketability

The Edinburgh housing market remains a highly marketable location with demand for both private and affordable units confirmed via the SESplan Housing Needs and Demand Assessment. The proposed site could be programmed for completion within the LDP period (including a contribution to the pre-2019 SESplan period). Based on the estimated capacity of 190 units, a 3-4 year build and sales programme would be required allowing for a site start in 2017/18.

Status: Effective

Infrastructure

Utility connections and water and drainage connections are available to the site with any localised upgrading of capacity able to be met by the developer.

Status: Effective

Land Use

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

Status: Effective

Overall, there are no known constraints which will hinder delivery of housing completions within the LDP period.

The site allows for a suitable 'infill' opportunity (where the existing Green Belt designation is now redundant due to wider coalescence of Musselburgh and Wallyford), adjacent to a rail station and is capable of a significant contribution to Edinburgh's land supply shortfall.

Planning Application

In order to demonstrate deliverability, the landowner submitted a Proposal of Application Notice (Ref.14/00017/PAN, registered 16th July 2014) with an initial pre-application consultation event undertaken on 17th September 2014 at the Musselburgh East Community Centre. The purpose of this event was to introduce the potential development proposals in broad terms.

Thereafter, Stewart Milne Homes entered into a conditional purchase contract with the landowner and a planning application (in principle) was prepared which included the full suite of supporting reports contained within Appendix A.

The application was registered by East Lothian Council on 15th March 2016.

Subsequently, the Council advised that additional information would be required under the terms of Environmental Impact Assessment legislation. This related specifically to additional landscape and ecology information, namely:

Zones of Theoretical Visibility diagrams
Wireframe image visual assessment of proposed housing massing in relation to seven agreed key viewpoints
updated landscape framework strategy
bird surveys

This updated information is currently being prepared and will be submitted to the Council in November to enable full consideration of the pending application.

The above process demonstrates the intentions of Stewart Milne Homes to enable short term delivery of the proposed site.

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

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

Modifications(s) Sought:

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

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

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

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

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

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

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

Justification for Modification(s):

Paragraph 3.31 – To reflect Scottish Planning Policy

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

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

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

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

- 2,115 completions are programmed from LDP sites in the period to 2019 which is split as 790 in 2017/18 and 1,325 in 2018/19 (HTN Table 14) - this would result in overall annual completions of 1,652 and 2,012 in these respective years (HTN Table 15) in comparison to the highest recorded figure of 867 (2006/07) and 2009-15 average of 340.
- 2,906 completions are programmed between 2019-24 which is split 990-530-445-435-506 from 2019-24 (HTN Table 14) - this results in overall annual completions being in excess of the highest ever recorded for three years (2019-22) as per HTN Table 15
- HTN Appendix 2 sets out estimated programming of Proposed LDP sites which supports the aforementioned figures for the two respective time periods. It is appreciated that this has been reviewed since the Main Issues Report stage. However, it is noted that an estimated 790 completions are programmed on 35 No. LDP sites in 2017/18 with a further 1,325 completions programmed for 2018/19. This will require planning approvals with agreed legal agreements and associated infrastructure (school) provision to allow for site starts by October 2017 at the latest. This is still highly optimistic given the LDP examination requirements in 2017 along with associated impact on infrastructure programming.
- Programming of LDP sites is not yet agreed with the development industry and the 2015 Housing Land Audit presents the most up to date assessment of supply.
- To counter the real risk that further slippage will occur in implementing the proposed allocations, further sites should be allocated/approved to increase the chances of strategic targets being achieved.

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

Modifications(s) Sought:

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

Justification for Modification(s):

3a Maintaining an Adequate Effective Five-Year Housing Land Supply - What modifications do you wish to see made to the Maintaining an Adequate Effective Five-Year Housing Land Supply section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

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

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

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

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

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

3b Please give any information/reasons in support of each modification suggested to the Maintaining an Adequate Five-Year Housing Land Supply section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

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

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

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

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

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

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

5b Please give any information/reasons in support of each modification suggested to the Specialist Housing Provision & Other Specific Needs section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

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

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

Proposals Map

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

Modifications(s) Sought:

Inset Map 26 (Musselburgh) - add proposed housing site at Galt Terrace/The Loan, Musselburgh (LDP Environmental Report Site Assessment ref.MIR/MH/HSG133)

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

Justification for Modification(s) :

As stated above, in order to meet strategic and effective housing land supply targets, additional sites will be required. The proposed site is a suitable opportunity for additional housing.

Visual Upload:

Musselburgh site.jpg was uploaded

Visual Upload:

No file was uploaded

Representation to East Lothian Proposed Local Development Plan

In Support of
Galt Terrace / The Loan, Musselburgh

Prepared by
Clarendon Planning and Development Ltd

On behalf of
Stewart Milne Homes

November 2016



3	Introduction & Proposal
4	Section 1: Aims, Objectives & Outcomes
5	Section 2: Spatial Strategy
6	Section 3: Growing our Economy & Communities - Planning for Housing
8	Section 3: Growing our Economy & Communities - Education & Community
8	Section 4: Our Infrastructure & Resources - Transport
9	Section 5 - Diverse Countryside & Coastal Areas - Green Belt
11	Conclusions - A Deliverable Site: - Site Effectiveness Summary - Planning Application
Appendix A -	CD containing supporting documents contained within Application Ref. 16/00118/PPM

This representation to the East Lothian Proposed Local Development Plan (LDP) has been prepared by Clarendon Planning & Development Ltd on behalf of Stewart Milne Homes.

The representation objects to the non-inclusion of land at Galt Terrace/The Loan, Musselburgh and seeks an associated amendment to the Green Belt boundary.

In this respect, it is considered that the site presents an effective housing site which can contribute towards East Lothian’s strategic housing land requirement including the need to maintain a 5 year supply of effective housing land.

The site was the subject of a representation to the LDP Main Issues Report, on behalf of the landowner, in February 2015.

Additionally, an application for planning permission in principle for residential development on the site was submitted to East Lothian Council in February 2016 (ref.16/00118/PPM). Further landscape information is currently being prepared to support this application, in response to the Council’s request.

The representation therefore reiterates the merits of the proposal and addresses the relevant sections of the Proposed LDP and supporting documentation, seeking inclusion of the site as a housing allocation within the adopted East Lothian Local Development Plan.

The site extends to approximately 5 Hectares and sits on the south-eastern edge of Musselburgh and is bound by Galt Terrace and Galt Road to the north, The Loan (and Wallyford park & ride) to the east and the East Coast Main line to the south. The site’s immediate context is shown on **Figure I**.

The site and adjoining area is located within the East Lothian Strategic Development Area, as defined by the approved Strategic Development Plan. The site is therefore within an approved focus area for future growth where it will be necessary to realign the existing Green Belt boundary to facilitate planned growth, as per proposed allocations in the Proposed LDP.

The site was initially introduced via a Proposal of Application Notice, and associated initial pre-application public consultation, in 2014.

The submitted application is based upon planning permission in principle for approximately 190 residential units (detached, semi-detached, terraced and flatted types) with associated landscaping, footpaths and roads (including 25% on-site affordable housing provision).

As elaborated upon within the application supporting documentation (contained on CD as **Appendix I**), the design intention is to integrate the site with both Musselburgh and Wallyford by maximising close proximity to the existing rail station and improving the quality of connecting space (an existing footpath bisects the site leading from the rail station to Galt Road/Terrace). This approach will include a high quality landscape framework which will address site boundaries and link green space.



Figure I - Aerial view highlighting proposed residential site at Galt Terrace/The Loan, Musselburgh

Aims & Strategy Drivers

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

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

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

The plan's **key aims are broadly supported** in terms of East Lothian's role within the Edinburgh City Region.

East Lothian therefore requires to accommodate its share of the growth requirements as set out in SESplan for South-East Scotland with a primary focus on the East Lothian Strategic Development Area centred upon the main A1/East Coast Rail transport corridor.

It is clear that 'appropriate timescales' in delivering spatial strategy, as noted within Aim No.2, are going to be difficult to meet in terms of pre-2019 strategic housing requirements.

Objectives & Outcomes

- Promote sustainable development

This objective is supported. With regard to the proposed site at Musselburgh, given its location adjacent to a Wallyford rail station, new housing would contribute to climate change objectives by reducing car travel requirements whilst making efficient use of infrastructure (transport and land use integration) and maximising public transport opportunities (also adjacent to established bus route and nearby park and ride facility).

- Help grow the economy, increase housing supply and reduce inequalities

This objective is supported. The proposed housing site at Musselburgh will address this objective by virtue of providing additional housing (market and affordable) within a marketable location along with associated job creation and local economic benefits. The proposal will also contribute to regeneration of this part of Musselburgh to assist with creating mixed communities.

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

This objective is supported. The proposed site at Musselburgh does not sit within a Special Landscape Area and its role within the Green Belt has been significantly diminished through existing development which has joined Wallyford and Musselburgh. New housing can be accommodated within a suitable landscape framework which can enhance the current settlement edge and provide new greenspace opportunities whilst contributing to place making objectives.

- Ensure adequate infrastructure capacity and an appropriate use of resources

This objective is supported. Education infrastructure is now one of the main hurdles to delivering new housing in line with Government objectives. The proposed site can provide for proportional financial contributions towards planned new primary and secondary schools in the local area.

Proposed LDP

Section 2: Spatial Strategy

Paragraph 2.3 of the Proposed LDP states “the spatial strategy is a compact one, as it focuses the majority of new development in the west of East Lothian. This is where the best opportunities are to locate new housing and economic development in the most accessible part of the area.”

In terms of the **Spatial Strategy for the Musselburgh Cluster**, the LDP proposes significant growth for this area with fifteen land allocations for housing, mixed-use and employment sites. Of these allocations, this LDP supports new proposals for substantial expansion of Musselburgh to the south-west (Craighall), Wallyford (extending existing allocation) and Whitecraig (north and south), as illustrated on **Figure 2**.

It is noted that the Craighall allocation (Ref.MH1 - 1500 homes plus mixed-use elements) in particular extends Musselburgh across the AI and joins with Old Craighall, i.e. promotes coalescence.

The extension of existing allocations (1,544 homes) at Wallyford to both north-east and south-west (Ref.MH10 - 600 homes and MH13 - 170 homes) presents a considerable incursion into the Green Belt which is highly visible from the AI.

As detailed in relation to LDP Section 5 below, the major new allocations at Craighall and Wallyford (Howe Mire and Dolphingstone) were both rated negatively by the Council’s own landscape assessment (LDP Environmental Report Appendix 5). The extended development area as illustrated on **Figure 2** demonstrates that any perception of separation between Musselburgh and Wallyford will be removed.

Overall, in order to accommodate the required growth, the LDP has endorsed planned coalescence (Musselburgh with Old Craighall and essentially with Wallyford).

LDP Paragraph 2.6 reiterates that the proposed spatial strategy will require amendment to green belt boundaries in the west of East Lothian, stating “the form and structure of settlements as well as the boundaries of the green belt will need to change to deliver new development in the most appropriate way.”

In this respect, the proposed site at Galt Terrace / The Loan is located at the heart of the preferred growth area and the proposal would have a minor (not significant) impact upon Green Belt objectives, as set out in the Landscape and Visual Impact Appraisal undertaken and submitted as part of the current planning application (see **Appendix A - CD**).

Additional landscape information is currently being prepared as part of the current application with impact of development being assessed in greater detail (the proposed landscape framework is included within Appendix A). This demonstrate how the site could be integrated within both Musselburgh and Wallyford and improve greenspace connections and linkage and gateway place character at Wallyford rail station.

As detailed hereafter, East Lothian have not identified sufficient short term housing sites. Given the Musselburgh cluster is within the western and most accessible part of the Strategic Development Area (Paragraph 2.14) and the proposed site adjoins Wallyford which is “well served by public transport” (Paragraph 2.17) with improvements proposed at Wallyford station, including car park expansions and platform lengthening (Paragraph 2.18) the proposal accords wholly with proposed LDP spatial strategy.

The pending planning application for the site (ref. 16/00118/PPM) includes full supporting information which, as noted, is currently being added to with additional landscape information. A copy of the supporting reports have been provided on CD (**Appendix A**) as appendices to this representation

to demonstrate deliverability and suitability of the site for approximately 190 new homes.

In summary, Appendix A contains the following studies:

- Planning Policy Statement
- Housing Land Assessment
- Landscape Visual Impact Assessment
- Draft Landscape Framework
- Design Statement
- Transport Assessment
- Education Impact Assessment
- Pre-application Consultation Report
- Noise Survey
- Site Feasibility Desk Study Report
- Ground Investigation Report
- Archaeology Desk Based Report
- Bat Activity Survey Report
- Extended Phase I Habitat Survey

As such, Stewart Milne Homes object to the non-inclusion of Galt Terrace / The Loan, Musselburgh as a proposed site within the Musselburgh Spatial Strategy (as per Figure 2 below) and associated Table HOU1 and Inset Map 26 (Musselburgh) with revisions sought as per the following:

Proposal MH16 - Land at Galt Terrace/The Loan, Musselburgh. Capacity 190 homes with associated landscaping, amenity greenspace and SUDS features.

Spatial Strategy for the Musselburgh Cluster

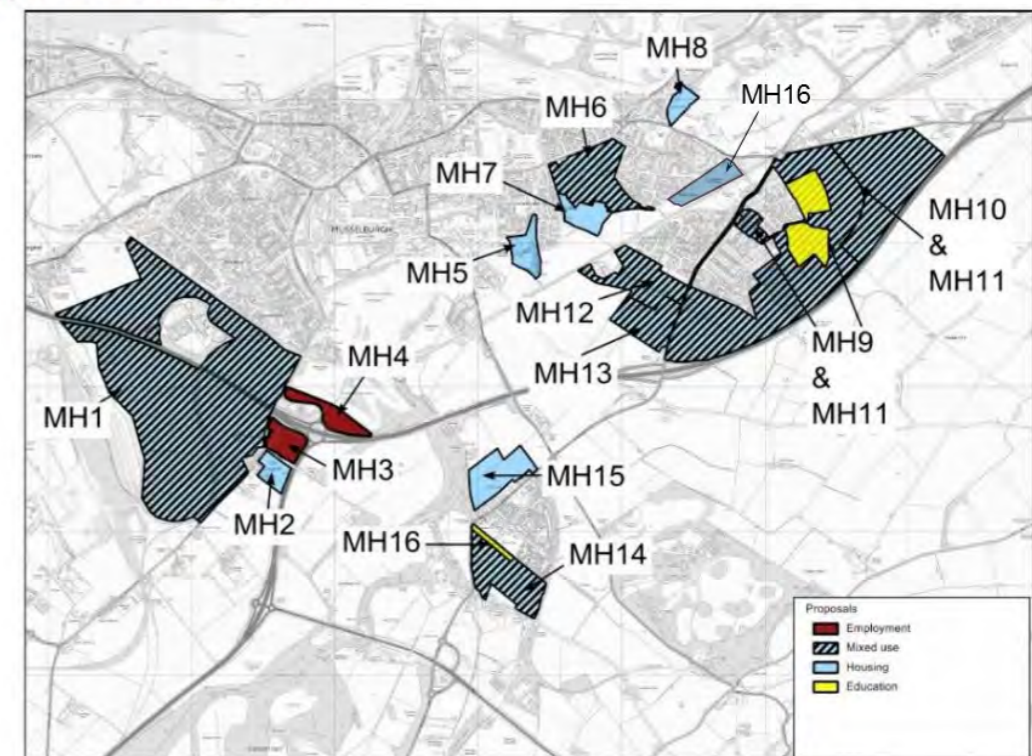


Figure 2 - Proposed LDP Musselburgh Spatial Strategy with proposed site added as Proposal MH16

Proposed LDP

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

Housing Land Requirement

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

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

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

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

Housing Land Supply

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

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

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

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

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

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

the highest ever recorded for three years (2019-22) as per HTN Table 15

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

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

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

Effective Land Supply Methodology

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

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

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

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

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

The adjusted calculation is illustrated in Table A below.

Table A
5 year Effective Land Supply 2015-2020

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

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

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

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

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

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

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

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

Policy HOU2 sets out the criteria by which potential new sites to meet an effective land supply shortfall should be assessed. Whilst requiring compliance with SESplan Policy 7 criteria (i.e. impact on local character, Green Belt objectives and local infrastructure availability), the policy has additional criteria; location (extension of defined settlement), effectiveness (can be substantially complete

within 5 years), scale (maximum of 300 units), timing (housebuilder interest) and development plan strategy (not prejudicing existing allocations and associated infrastructure requirements).

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

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

For clarity, the proposed site at Galt Terrace/The Loan could meet the requirements of the proposed Policy HOU2:

1. **Location** - Site is an extension of the principal settlement within the East Lothian Strategic Development Area.
2. **Effectiveness** - Site is under control of housebuilder and can be completed within a five year period.
3. **Scale** - The proposal would be appropriate in relation to the existing settlement and is under 300 units (proposal is for 190).
4. **Timing** - The site is under legal contract to Stewart Milne Homes and can be delivered in the short term.
5. **Development Plan Strategy** - Infrastructure in terms of transport/access is achievable and in terms of education, financial contributions would assist with delivering planned new primary and secondary schools in the catchment area.
6. **Infrastructure** - As above, the site can be implemented with planned education infrastructure committed.

Affordable Housing

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

Education Infrastructure Strategy

It is noted that, with reference to new education provision in the Musselburgh Cluster, Paragraph 3.76 states that significant new capacity is required at primary and secondary level.

This includes a committed new primary school at Wallyford and a planned new secondary school also at Wallyford. Paragraph 3.77 states that Musselburgh Grammar School will accommodate requirements on a temporary basis until the new secondary school is completed with all new housing developments of over 5 units required to make financial contributions as per the Proposed Musselburgh Secondary Education Contribution Zone (set out in the Supplementary Guidance: Developer Contributions Framework - referred to hereafter). Proposal ED1 sets out that financial contributions will be sought for both primary and secondary school provision in relation to planned new schools at Wallyford.

An assessment of education capacity was undertaken and submitted with the current planning application for the proposed site. This is included as **Appendix A** and also highlights the scope for temporary accommodation to accommodate short term housing prior to completion of new schools.

The overall approach to education for the Musselburgh Cluster as outlined in Proposal ED1 is therefore supported in principle.

Education Contribution Requirements

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

The proposed site is located with the Musselburgh Secondary Education Zone and the Wallyford Primary Education Zone. It is noted that these new schools are subject to schools consultation to confirm the new catchment areas.

Page 28 of the **Supplementary Guidance: Developer Contributions Framework** outlines the specific sums for this zone.

The proposed site would require to make the following financial contributions.

- £4,073 per house towards Secondary capacity
- £237 per house towards Secondary campus land
- £7,153 per house towards Primary capacity
- Total of £11,463 per house

Impact upon Loretto RC Primary School is to be assessed on a site by site basis for proposals not included within the LDP.

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

In this regard, costings for new infrastructure in terms of a clear calculation of how this cost is spread across proposed contribution sites/areas should be set out in more detail (it is noted from the LDP Action Programme that the developer proportion of the new secondary school for this cluster is £12.686m from a total cost

of £37.884m whilst the new primary school cost is £5.508m).

It is noted in Paragraph 1.21 of the Supplementary Guidance that windfall sites will not be supported where they impact negatively upon LDP sites and associated infrastructure requirements. However, it is clear that the proposed site at Musselburgh could assist with the overall strategy by releasing early funds towards provision of new schools where final school capacities are yet to be determined.

Community Facilities (Proposal CF1)

It is noted that there is a requirement for sports pitches across some, but not all, of the contribution zones to meet additional demand arising from the proposed development strategy. The proposed site lies generally within one of the Musselburgh Sports Facilities Contribution Zones (LDP Page 195) but is not subject to specific requirements given it is a non-allocated site. Proximity to existing sports pitch provision (adjacent to the site) should be taken into account in any future site specific negotiation.

Health and Social Care Facilities (Proposal HSC2)

No specific health care requirements are noted for the Musselburgh area where the proposed site is located.

Open Space and Play Provision (Policy OS3&OS4)

The proposed site can adhere to requirements, which would be the subject of detailed design considerations, in terms of minimum open space requirements for new housing, off-site enhancements and play provision requirements.

Location

Policy T1 requires new development to be well located and accessible in relation to public transport and walking/cycling routes, which the proposed site at Musselburgh wholly adheres to (T.A. contained within **Appendix A**).

Infrastructure Fund

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

Whilst not covered by site specific requirements, the proposed site at Musselburgh is located immediately adjacent to the following contribution zones (**Supplementary Guidance: Developer Contributions Framework** sets out contributions) albeit it is noted that windfall sites will be assessed on a case by case basis:-

- Segregated Active Travel Contribution Zone: £454 per unit
- Rail Network Contribution Zone: range of £305 to £762 per unit
- Old Craighall A1/A720 Junction Contribution Zone: £25 to £36 per unit
- Salter's Road Interchange A1 Contribution Zone: £190 to £919 per unit
- Bankton Interchange A1 Contribution Zone: £10 per unit
- Musselburgh Contribution Zone: £47 to £265 per unit
- Tranent Contribution Zone: £82 to £459 per unit
- Total ranging from £1,113 to £2,905 per unit

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

Proposed LDP

Section 5: Diverse Countryside & Coastal Areas - Green Belt

Green Belt Purpose

Paragraph 5.17 notes that the purpose of the Green Belt in East Lothian is to maintain the setting, character and identity of Edinburgh and its neighbouring settlements, including Musselburgh, Wallyford and Whitecraig. However, as stated in Paragraph 5.18, the boundaries of the Green Belt require to be modified to accommodate the spatial strategy (including housing growth). Boundaries have therefore been amended within the Musselburgh Cluster as part of the Proposed LDP.

Policy DC7 - Development in the Edinburgh Green Belt - protects the existing Green Belt from development that does not accord with specific criteria.

This representation objects to the inclusion of the proposed site at The Loan/Galt Terrace, Musselburgh within the defined Green Belt.

As noted above, it is concluded that additional housing sites will be required to support the spatial strategy (and strategic housing requirements).

The over-riding housing requirement, aligned with the site's highly sustainable location, outweigh the site's current Green Belt designation.

In particular, the site has excellent public transport accessibility and, as noted in the LDP Main Issues Report (when assessing realignment of Green Belt boundaries) "if the coalescence of settlements would be a consequence, then this will only be supported if the advantages of the site in question clearly outweigh those of other sites and the resultant loss of settlement identity that would arise from its development" (LDP MIR).

Coalescence of Musselburgh and Wallyford has already occurred with the Wallyford Park and Ride facility and adjoining consented housing site (as illustrated on **Figure 1** on Page 3) joining the

settlements to the east of the site. Further, the allocation of additional land at Pinkie Mains to the west of the proposed site has also added to overall perception of coalescence.

It is accepted that release of the proposed site would require a suitable design response in relation to new open space, landscape and boundary treatment. There would also be Green Network opportunities in terms of linkage to existing paths and providing greater greenspace connectivity.

East Lothian Green Belt Release

The Proposed LDP seeks to amend the existing Green Belt at several locations within the Musselburgh Cluster, including proposed housing sites at Craighall, Dolphingstone and Howe Mire.

The LDP Environmental Report (Appendix 5) assessments of these sites rates impact either red, amber or green in terms of negative to acceptable impact. The landscape impact is assessed as follows:

- **Craighall** (Proposal MHI - 1500 units): **'red' - significant impact on landscape.** There are **"long views across the site"** and **"open views across site...towards Mayfield ridge and Moorfoot Hills"**. The conclusion is that **"development would have significant urbanising effects in a currently open landscape, particularly in views from the A1. Development of the whole site would also result in the physical coalescence of Musselburgh with Newcraighall (Edinburgh) and the planned Shawfair development in Midlothian."** (LDP Emt Report Appendix 5, Page 27)
- **Dolphingstone** (Proposal MH10 - 600 units): **'red' - significant impact on landscape.** **"The site is largely devoid of natural boundary features and is highly visible from the surrounding landscape and road network, including the A1 to the south, from which**

there are open views across the site towards Edinburgh and the Firth of Forth. The site is within the Edinburgh Green Belt and helps maintain the separation between Wallyford and Prestonpans, especially when seen in long distance views from higher land to the south such as around Fa'side and Tranent. The scale of development proposed would represent a significant encroachment into the Green Belt and may undermine its role in preventing coalescence." (LDP Emt Report Appendix 5, Page 76)

- **Howe Mire** (Proposal MH13 - 170 units): **'red' - significant impact on landscape.** **"To the south of Victory Lane is a large open agricultural field. This field is clearly visible from Salter's Road to the east, where there are open long-distance views across it to Arthur's Seat and the Pentland hills. It is also visible in views from Crookston Road further west, looking east towards Fa'side Hill. This field has no particular landscape or topographical features to provide visual containment and its development would be visually prominent and represent a major intrusion into open countryside, affecting the landscape setting of Wallyford."** (LDP Emt Report Appendix 5, Page 80-81)

This highlights that all three of these major housing sites were assessed by the Council as having significant landscape impact (including long range visibility and coalescence) but this impact was dismissed in allocating these sites.

The proposed site at Musselburgh, by contrast, is well contained from long range views towards the site and Musselburgh and Wallyford are already conjoined.

As further illustrated in the comparison of LDP Environmental Report Site Assessments on Page 10, the proposed site compares favourably with proposed allocations and given the housing need and sustainability factors, the site should be excluded from the Green Belt designation.

Landscape & Visual Impact Assessment

The LVIA contained within the supporting application documents (**Appendix A**) elaborates upon the justification for releasing the proposed site from the Green Belt. In particular, an assessment of existing landscape and heritage designations is provided along with assessment of ten key viewpoints.

The assessment concludes that:

- There is landscape capacity for the site to absorb the proposed development.
- In respect of the existing Green Belt designation, it is important to note that the proposed site allows for continuation of the Musselburgh urban fringe without undermining the objectives of the Green Belt.
- At present there is a degree of integration between Musselburgh and Wallyford given the facilities for commuters to Edinburgh, namely the Rail halt, Park and Ride and footpath connections.
- The existing weak Green Belt boundary at the edge of this part of Musselburgh would be replaced with the proposed development incorporating defensible boundaries which demarks the extent of the town whilst retaining the footpath connections.
- The proposed development appears to be acceptable in landscape and visual terms given the visual containment of the site, and the limited landscape and visual impacts as noted in the assessment.

As noted above, the existing LVIA is currently being added to with wireframe image assessment of the key viewpoints and an updated landscape framework strategy.

Proposed LDP Environmental Report Appendix 5

Site Assessment - The Loan, Musselburgh

The Council has provided a Site Assessment for each of the sites promoted for development within the Proposed LDP Environmental Report.

The site at Galt Terrace/The Loan, Musselburgh is included as site ref.MIR/MH/HSG133 within Appendix 5 of the Environmental Report (Pages 119-123).

The following provides an analysis of this assessment to illustrate comparison with allocated housing sites.

Each comment accords with the colour coding utilised by the Council, i.e. **green** (positive), **amber** (any constraints can be overcome), **red** (significant constraint).

Location

- Site is outwith settlement boundary but is “well related” to Musselburgh and Wallyford.

Accessibility

- The assessment notes that Musselburgh has the highest ranking for accessibility within East Lothian and second in the whole SESplan area. The site is within 400m of bus stops and Wallyford Park and Ride, within 800m of Wallyford Rail Station (adjoins the site) and within 1600m of local facilities.

Exposure

- The assessment notes that the site has some shelter from northerly winds due to existing housing to the north. The Council have also assessed as ‘amber’ the allocated sites at Craighall, Edenhall, Pinkie Mains, Levenhall, Howe Mire and Whitecraig South. **The Council have assessed as ‘red’ (significant constraint) for allocated sites at Dolphingstone and Whitecraig North.**

Aspect

- The site is assessed as having a northerly aspect. However, given the site is relatively flat this is contested. **The Council have also assessed as ‘red’ the allocated sites at Craighall, Edenhall, Pinkie Mains, Levenhall, Dolphingstone, Howe Mire and Whitecraig South and North.**

Suitability for Proposed Use

- Compatible with adjoining residential uses. Mitigation measures required for potential noise impact from rail line (Noise Survey provided in Appendix A). The Council have also assessed as ‘amber’ allocated sites Craighall, Edenhall, Pinkie Mains, Howe Mire and Whitecraig North.

Fit with local/strategic policy objectives

- Whilst the assessment notes the site is within the SDA and would “align well with strategic policy” it notes that it would conflict with Green Belt objectives and is assessed as ‘red’. Conversely, **the Council have assessed as ‘green’ allocated (greenfield) sites which are also within the current Green Belt including Craighall, Pinkie Mains, Levenhall, Howe Mire, Whitecraig North and South whilst Dolphingstone is assessed as ‘amber’.** **There is a clear discrepancy between these assessments.**

Physical Infrastructure Capacity

- The assessment notes a requirement for careful design of any proposed access from The Loan and wider traffic impact assessment (TA contained within **Appendix A**). The Water and Waste Water Treatment works are noted as having capacity. The Council have also assessed as ‘amber’ all allocated sites.

Service Infrastructure Capacity

- The assessment notes the potential extension of capacity for the Musselburgh Grammar and

Wallyford Primary catchment areas, which forms part of the LDP strategy. The Council have also assessed as ‘amber’ all allocated sites.

Deliverability/Effectiveness

- The assessment notes that the site is within a Coal Mining High Risk Area and that infrastructure capacity is yet to be confirmed. The Site Feasibility and Ground Conditions reports (**Appendix A**) address the coal mining risk whilst infrastructure upgrades / financial contributions can be provided. Additionally, the site has national housebuilder involvement and, subject to agreed solutions/contributions for local road network and education capacity, is deliverable in the short term. The Council have also assessed the majority of the allocated sites as ‘amber’.

Biodiversity, flora & fauna

- The site is not within any areas designated for their international, national or local nature conservation interest. The need for additional survey work for birds is highlighted and this is currently being addressed as part of an updated habitat/ecology report for the current application. This requirement is also the case at allocated sites Craighall, Pinkie Mains, Levenhall, Dolphingstone, Howe Mire and Whitecraig North and South.

Population

- The assessment notes the positive contribution of housing (including affordable housing) and contribution to regeneration of disadvantaged areas of Pinkie Braes and Wallyford.

Human Health

- The site has no known contamination and good access to open space and the core path network. Noise impact and air quality require to be assessed. The Council have also assessed the majority of the allocated sites as ‘amber’.

Soil

- The development of the site would result in some loss of prime agricultural land. There are no rare or carbon rich soils on this site. The Council have also assessed as ‘red’ allocated sites Craighall, Levenhall, Pinkie Mains, Howe Mire and Whitecraig North and South.

Water

- The assessment notes medium risk of surface water flooding in the north east of the site. This is addressed in the Site Feasibility Desk Study (**Appendix A**). The Council have also assessed the majority of the allocated sites as ‘amber’.

Air

- As per other sites assessed in MIR, development on the site would not be affected by existing sources of air pollution. The site is in a location with good access to local facilities, active travel and public transport accessibility so the need to travel by car is minimised.

Climatic Factors

- As per other sites assessed in MIR, Musselburgh is in a highly accessible location in regional terms and closer to major centres of employment than other East Lothian settlements, and therefore development of this site would be focusing development in the most accessible and sustainable locations. The site is well positioned to access public transport, active travel routes, as well as local facilities and services. The site’s aspect does offers some potential for development that is resource efficient through siting (i.e. solar gain).

Material Assets

- The site has been assessed negatively as greenfield land but this is the case in the majority of the allocated LDP sites.

Conclusions - A Deliverable Site

Cultural Heritage

- As with the majority of other allocated housing sites (and existing allocations) in the local area, the site is within a wider designated battlefield area and therefore proposals would be subject to suitable archaeological evaluation. This is addressed in the desk top archaeology report (**Appendix A**).

Landscape

- The assessment notes that the site is the only remaining open area between Wallyford and Musselburgh at this location. However, as noted elsewhere, these settlements have already been joined with the Wallyford Park and Ride facility and consented housing. The coalescence of these settlements has therefore already occurred and this narrow strip of land does not now contribute to wider Green Belt objectives. **The landscape assessment and strategy contained within Appendix A address this further. It is noted that the allocated sites at Craighall, Howe Mire and Dolphingstone are also rated negatively for landscape with considerably greater coalescence/landscape impact issues.**

Overall

- The site compares favourably with allocated LDP housing sites. The only criteria rated differently for the proposed site as against allocated sites was that of 'fit with local/strategic policy objectives'. This however was due to conflict with its Green Belt designation which is the same case for the majority of the housing allocations. With suitable mitigation, as outlined in supporting reports in Appendix A, there is no reason why the proposed site at Galt Terrace / The Loan cannot contribute positively as a new housing site.**

Site Effectiveness Summary

Scottish Planning Policy and guidance set out in *PAN 2/2010 Affordable Housing and Housing Land Audits* require that sites allocated within Local Development Plans are effective, being able to contribute completions during the plan period (up to year 10 from LDP adoption).

As such, PAN2/2010 criteria for assessing site effectiveness provide a test against which sites require to be gauged with **land at Galt Terrace/ The Loan, Musselburgh considered effective, being free of potential site constraints and able to deliver units within the plan period.** Specifically:-

Ownership

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

Physical

The Site Feasibility Desk Study contained within Appendix A outlines the suitability of the site for the proposed development with no insurmountable issues anticipated.
Status: **Effective**

Contamination

The site, given its greenfield arable nature, has been deemed to have a low risk of contamination.
Status: **Effective**

Deficit Funding

The development would be privately funded, also allowing for required infrastructure upgrades.
Status: **Effective**

Marketability

The Edinburgh housing market remains a highly marketable location with demand for both private and affordable units confirmed via the SESplan

Housing Needs and Demand Assessment. The proposed site could be programmed for completion within the LDP period (including a contribution to the pre-2019 SESplan period). Based on the estimated capacity of 190 units, a 3-4 year build and sales programme would be required allowing for a site start in 2017/18.

Status: **Effective**

Infrastructure

Utility connections and water and drainage connections are available to the site with any localised upgrading of capacity able to be met by the developer.

Status: **Effective**

Land Use

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

Status: **Effective**

Overall

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

The site allows for a suitable 'infill' opportunity (where the existing Green Belt designation is now redundant due to wider coalescence of Musselburgh and Wallyford), adjacent to a rail station and is capable of a significant contribution to Edinburgh's land supply shortfall.

The site compares favourably with allocated housing sites within the Proposed LDP and is considered, by virtue of its location adjacent to Wallyford rail station, as being the most sustainable available site within the Musselburgh cluster area.

Planning Application

In order to demonstrate deliverability, the landowner submitted a Proposal of Application Notice (Ref.14/00017/PAN, registered 16th July 2014) with an initial pre-application consultation event undertaken on 17th September 2014 at the Musselburgh East Community Centre.

The purpose of this event was to introduce the potential development proposals in broad terms.

Thereafter, Stewart Milne Homes entered into a conditional purchase contract with the landowner and a planning application (in principle) was prepared which included the full suite of supporting reports contained within **Appendix A**.

The application was registered by East Lothian Council on 15th March 2016.

Subsequently, the Council advised that additional information would be required under the terms of Environmental Impact Assessment legislation. This related specifically to additional landscape and ecology information, namely:

- Zones of Theoretical Visibility diagrams
- Wireframe image visual assessment of proposed housing massing in relation to seven agreed key viewpoints
- updated landscape framework strategy
- bird surveys

This updated information is currently being prepared and will be submitted to the Council in November to enable full consideration of the pending application.

The above process demonstrates the intentions of Stewart Milne Homes to enable short term delivery of the proposed site.

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On behalf of Stewart Milne Homes





Figure 1 - Aerial view highlighting proposed residential site at Galt Terrace/The Loan, Musselburgh

From:
To: [Local Development Plan](#)
Subject: LDP Representations
Date: 06 November 2016 18:59:26

Dear Sir,

Finalised Local Development Plan 2016

I wish to make the following representations on behalf of the East Lothian Panel of the Architectural Heritage Society of Scotland.

1. The proposed policy in the LDP on Listed Buildings, Ancient Monuments and Conservations Areas lacks strength and consistency.
2. SESplan's SDP says that the Region is *internationally recognised as an outstanding area* but the policies of the proposed LDP will not in my view be strong enough to maintain this vision.
3. The overall objective of the LDP on p10 is to *protect the county's cultural heritage assets and its character and appearance are to be reflected in new development*. The wording is not strong enough to achieved this. Experience on the ground shows how difficult they are to achieve in practice without tightening up on the wording.
4. Everything depends on the supplementary guidance. If there is not a strong steer in the LDP wording to start with, the objectives will not be achieved. Over time, the reason for having a plan in the first place will be compromised leaving a more damaged environment than ever.
5. It is also stated that the policy is "to ensure that the area's significant international, natural and local cultural assets are protected and conserved and, where applicable, enhanced". The words "where applicable" are not explained and therefore meaningless.
6. Presumably the policy applies to the character and appearance of Conservation Areas, Listed Buildings and their settings, Scheduled Ancient Monuments or their settings, local archaeological sites, historic gardens and designed landscapes and historic battlefield sites, *but it is too weak*.
7. To accommodate additional development "*while preserving and enhancing historic environment features, including their setting, and ensuring that their impact on the cultural heritage of EL towns, villages and areas is minimised*" would allow such a wide interpretation as to be useless.
8. The omission of any reference to Historic Environment Scotland with its considerable experience and long tradition of clear and practical advice notes is surprising. The wording of the objectives of the new LDP do not reflect let alone build on this experience. At least there should be a list of

them.

In summary, the new LDP will considerably weaken the control of development in East Lothian with respect to the protection of its extensive historic built and environmental assets.

Yours faithfully,

Brian Young

From:
To: [Local Development Plan](#)
Subject: East Lothian Council proposed Local Development Plan 2016
Date: 06 November 2016 19:03:36
Attachments: [East Lothian Council Draft Local Development Plan 2016 Consultation Response FORL \(CORRESPOND - 1128355 - PDF A - A\) - 1.PDF](#)

Dear Sir/Madam,

Find attached a consultation response to the East Lothian Council's proposed Local Development Plan, submitted by Natural Power Consultants Limited on behalf of Fred. Olsen Renewables Limited.

An email acknowledging receipt of this response would be appreciated.

Yours sincerely,
Gavin

Gavin Shirley MRTPI
Project Manager
naturalpower.com
[renewable energy consultants](#)

tel: +44 1644 430 775

email: gavins@naturalpower.com

The Natural Power Consultants is a registered company ((SC177881) in Scotland. Our Registered Office is The Greenhouse, Dalry, Castle Douglas, DG7 3XS, UK.
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East Lothian Council Draft LDP 2016

Dear Sir / Madam

Fred. Olsen Renewables Ltd (FORL) is a Renewable Energy Developer whose initial focus has been in wind power and its first investment was made back in 1996. Crystal Rig Wind Farm was the first large scale onshore wind farm development by FORL with a nameplate capacity of 200.5 Megawatts (MW). The initial Crystal Rig Wind Farm Phase I of the development became operational in October 2003, and at the time was the largest onshore wind farm in Scotland consisting of 20 turbines, with an installed capacity of 50 MW. A further 5 turbines were added in 2006. Phase II of the wind farm became operational in July 2010 and added an additional 60 wind turbines to the site, which increased the capacity of the site by 138 MW. Phase III has almost finished construction which will add 6 more turbines.

The development and construction of Phase I and II of Crystal Rig Wind Farm has supported 400 job years across Scotland and 200 job years across Scottish Borders and East Lothian. The operations and maintenance of Crystal Rig Wind Farm continues to support jobs. For Phases I and II it supports approximately 90 jobs across Scotland, including 40 in the Scottish Borders and East Lothian.

The Community Development Fund set up by Fred. Olsen Renewables Ltd. Has to date distributed over £1 million to local communities.

Since 2011 Crystal Rig Wind Farm has produced electricity approximately equivalent to the power consumed by every household in Scottish Borders and East Lothian throughout this time period.

Crystal Rig Wind Farm currently saves over 200,000 tonnes of carbon emissions each year and could save an additional 75,000 tonnes annually if Phase III and Phase IV are constructed.

FORL has spent a total of £215.5 million on the development and construction of Phases I and II of Crystal Rig Wind Farm. This represents one of the most significant investments in the local area over the past ten years. Indeed, if Phase III and the costs of potential future phases proceed, for which the investment would amount to approximately £94.6 million, the total investment for Crystal Rig Wind Farm would exceed the proposed investment in the Borders Railway (estimated at over £300 million in 2012).

Local suppliers have formed a fundamental component of the supply chain during both the construction and operational phase of Crystal Rig Wind Farm. The local companies involved in the supply chain represent a range of sectors. The companies include:

- Glendinning Ground Works;
- Belhaven;
- Claymore Lock & Alarm Co;
- RD Anderson Haulage;
- FM Now;
- CMYK Digital Solutions;
- Alba Water;
- Arthur Mackay; and

November 2016

1128355



- Demvik (Scotland).

In addition to the direct spend by the developer and subcontractors, the tourism sector locally benefits from the spend of contractors that come into the area to work. Each year there are 300 bednights taken by workers on the Crystal Rig Wind Farm. It is estimated that these stays add £30,000 each year to the local tourist economy.

Crystal Rig Wind Farm (Phase I and Phase II) has paid an estimated £6.7 million in business rates since 2003.

FORL has a close interest in the East Lothian area. Natural Power Consultants Limited has on behalf of FORL submitted the consultation response to the East Lothian Council's draft Local Development Plan.

Yours sincerely,

Euan Hutchison
Principal Consultant

euanh@naturalpower.com

1. Section 1 – Intro

'There is now very limited remaining strategic capacity for further wind farm development in the area without significantly harming its character and appearance, although in identified areas of strategic capacity there may be opportunities to repower existing wind farm sites with appropriate proposals.'

It is welcomed that East Lothian Council (ELC) recognises potential for re-powering existing sites. As ELC will be aware, whilst government financial support for new large scale onshore wind energy has been removed, clear political support still remains for further development of onshore wind energy in Scotland. It must however be recognised that future onshore wind proposals can only continue if larger turbines are allowed to be developed in order for them to compete with other forms of generation and deliver electricity at the lowest possible cost to the consumer. Therefore, it is all the more important that the generating capabilities of existing sites are maximised through appropriately designed extensions and re-powering projects that make the most of existing site infrastructure such as access tracks and grid connections. The statement above should therefore be altered to reflect this position.

'The Scottish Government is committed to promoting the increased use of renewable energy sources. This commitment recognises renewables' potential to support economic growth. Renewable energy has a central role to play in Scotland's transition to a low carbon economy - representing a safer, more secure and cost-effective means of electricity generation than new nuclear plants; reducing our dependence on carbon-intensive fuels; and offering significant economic opportunities'. (Scottish Government – March 2016).

2. Other Infrastructure

2.1. Policy O13

Responsible wind farm developers consult with aviation authorities as standard practice. This policy is a reasonable inclusion provided that potential mitigation measures are accounted for in determining applications based on Edinburgh Airport's response. Where mitigation measures are available, they should be included in reasonably worded suspensive planning conditions. This should also apply to the Ministry of Defence.

3. Energy Generation, Distribution & Transmission

'Most renewable energy proposals can be considered against relevant policies of the Plan but wind turbines raise particular planning issues and require their own policy.'

Given the LDP is proposing policy specific to wind energy, it should be the wind policy that is of prime consideration and if compliant with such policy, the proposed development should be consented. If the proposed development fails a test against other policy, a balanced decision should be taken with weight given to the wind policy.

3.1. Wind Turbines

3.1.1. Paragraph 4.79

'The boundaries of the designations informing the extent of Group 2 areas may change during the lifetime of the Plan and any such change would be taken into account'

Any change should be directed by national policy and undergo appropriate consultation.

3.1.2. Paragraph 4.80

'Prior to the determination of a planning application for any wind farm the Council will require the landowner and any other parties with a legal or financial interest in the scheme to enter into a legal agreement to secure the complete decommissioning and restoration of the site and any relevant offsite works. This should include financial provision such that no decommissioning or restoration costs risk falling to the Council. The amount of financial provision required shall be informed but not bound by advice from an independent, suitably qualified contractor approved by the Council. This may also be required for smaller scale wind developments in some cases.'

It is not considered appropriate to expect legal agreements to be entered in to with the Council for securing decommissioning and restoration costs prior to planning consent being granted. It has the potential to unnecessarily delay

consents being granted and risk suitable projects not being built and risk missing delivering upon Scottish Government renewable energy targets.

The current process of securing such bonds post consent via a suspensive planning condition is apt and it is this approach that the LDP should advocate.

Suggest re-wording the start of the paragraph to: '*Prior to the start of construction, the Council will require...*'

The policy should be clear that the provision of the financial interest should be done so that it does not unnecessarily create a burden on the developer to provide duplicate arrangements for both owner and Council.

The reference of complete decommissioning and restoration of the site in the policy should be altered to relevant decommissioning and restoration. As per Scottish Renewables' response to Head of Planning Scotland in September 2016¹:

'...assumptions should not be made a 'standard' when they will place unnecessary cost burdens on developers and also undermine what may be best environmental practice, e.g. leaving trenched cable in-situ when it is at a depth to allow usual surface activity (e.g. agriculture) and leaving tracks for future beneficial use or natural regeneration. Natural re-generation is likely to be the normal practice for other activities such as forestry harvesting. Wind farms should not, as a matter of routine, be considered differently...In the case of an onshore wind development, a value can be attributed to the permanent physical asset. Re-sale value can also be validly attributed where it is realisable.'

3.1.3. Policy WD1: Wind Farms

'Wind farms are considered to be groups of four or more turbines over 42m in height to blade tip and will be assessed against the spatial framework for wind farms as illustrated on the Spatial Framework Plan for Wind Turbines including Areas of Strategic Capacity.'

Wind farms within Group 2 areas will only be supported where the Council is satisfied that siting, design or other mitigation can substantially overcome any significant effects on the qualities of the relevant designation(s) that justify inclusion in the Group 2 area. Proposals will only be supported where they will not have an adverse effect on the integrity of European sites designated under the Habitats Directive either alone or in combination with other projects and plans.'

Appropriate provision will be required to secure financial provision for decommissioning and restoration.'

We welcome this pragmatic approach to implementing SPP with respect to wind farms and would just note as per previous comment regarding paragraph 4.80, that the final sentence be re-worded as such:

'Appropriate provision will be required post-consent through an appropriately worded suspensive planning condition to secure financial provision for decommissioning and restoration.'

The spatial framework which includes an 'Area of Strategic Capacity' indicates potential for developing appropriate extensions to and re-powering of the existing Crystal Rig Wind Farm which backs our initial comments on Section 1 for maximising the potential of existing wind energy development.

3.1.4. Policy WD3: All Wind Turbines

Suggested changes have been made to the policy below. Deletions are marked with a strike through. Additions are underlined and any comment is provided in square brackets.

'Applications for ~~freestanding~~ [not clear what the term 'freestanding' is meant to mean] wind turbine development will be supported subject to policies WD1 and WD 2 and provided the impact of turbines, access tracks, and any other ancillary development is acceptable in terms of the following considerations:

- a) Cumulative issues with other similar development;*
- b) Impacts on communities ~~or individual dwellings~~;*
- c) Landscape and/or visual impacts;*

¹ Available online from: <https://www.scottishrenewables.com/publications/consultation-response-decommissioning-and-restorat/> (last accessed 04/11/2016)

- d) Impacts on natural and cultural heritage assets including their settings where relevant;
- e) Impact on the economy including tourism or and recreation;
- ~~f) Impact on the recreational value of public access routes;~~ [covered above]
- g) Impacts on aviation, defence interests, seismological monitoring;
- h) Impacts on the water environment, including drinking water quality;
- i) Impacts on telecommunications and broadcasting installations, especially transmission links;
- j) The 'carbon calculator' must have been completed;
- k) Feasible and acceptable routes and proposals for accommodating any abnormal loads and mitigating impacts on road network;
- l) Feasible and acceptable connection to the electricity grid, where relevant;
- m) The generating potential of an Area of Strategic Capacity would not be undermined; [potentially welcomed] and
- n) There is no adverse effect on the integrity of integrity of European sites designated under the Habitats Directive either alone or in combination with other projects and plans. [covered by (d)]

The economic impact of proposals including local and community socio-economic benefit, the scale of contribution to renewable energy targets, and effects on greenhouse gas emissions will be taken into consideration as appropriate. [covered by (b)(e)(j)]'

In general, this policy seems an appropriate approach. Bearing in mind the need to meet renewable energy generation at the lowest possible cost to the consumer it is important to identify the difference in wind yield that is achieved through optimising a site with higher tip heights.

The LDP defines 'Area of Strategic Capacity' as an area where there is long term potential for large scale wind development. Paragraph 4.82 (l) states that:

Proposals within an Area of Strategic Capacity should maximise the generating potential of the site while recognising the landscape and other constraints.

It is unclear how the generating potential of the 'Area of Strategic Capacity' would be assessed and prevented from being undermined. The 'Area of Strategic Capacity' is not specified by SPP and is a designation that goes beyond SPP guidance. In isolation the area appears to be an area of preference for the Council but read in conjunction with the comment made in Section 1, it is apparent that the Council considers there to be no capacity for new wind farm development anywhere outside the Area of Strategic Capacity. Wind farm proposals in Group 3 Wind Areas and outside of the Area of Strategic Capacity must be approached in the same fashion as those within the Area of Strategic Capacity. Provided this approach is taken, this area is a welcomed addition.

3.1.5. Policy WD4: Access Tracks

A policy for wind farm access tracks is unnecessary given this is infrastructure that is included within the assessment of Policy WD3. It is also baffling that wind energy development been singled out in the LDP for development of access tracks and no other form of development appears to have been restricted with such policy.

3.1.6. Policy WD5: Re-powering

This policy doesn't add anything to what is already enforced by Policy WD1, 2, & 3. It fails to recognise that re-powering sites could be subject to reduced scope of assessment given the current use of the site as a wind farm. Restoration is already covered in Policy WD3 & WD5 and is therefore unnecessary.

The aim of re-powering is to utilise as much of the existing infrastructure, such as access tracks and grid, as possible. In order to maximise the use of the site it may also be appropriate to include other technologies such as energy storage and other complimentary sources of generation, which could add significant value to the operation of the national grid. A possible re-worded condition is presented below:

'Proposals for re-powering will be considered favourably subject to consideration against relevant provisions of Policy WD1 and WD3. Re-powering may include, but not be limited to energy storage, wind turbine upgrades such as blade-tip

extensions and other forms of complimentary generation technologies. Re-powering proposals should demonstrate the use of existing infrastructure where possible. Given the existing use of the site for renewable energy, the scope of assessments required is likely to be less than that for a new proposal and should be agreed with the Council in advance of an application being submitted.'

It is noted that the re-powering requirement of Cockenzie Power Station in Policy PROP EGT1 is that '*any redevelopment proposal will be expected to make best use of the location's assets and bring significant economic benefits.*' The site is a National Development, but the assessments required upon this project are significantly less than that required of a re-powering wind farm which appears as a very unbalanced position for the LDP to hold.

3.1.7. Policy WD6: Decommissioning and Site Restoration

'All wind turbines must be decommissioned and the site restored to an appropriate condition within an agreed timescale after the earliest of (a) expiry of planning consent; or (b) the failure of the wind turbine to produce electricity for a continuous period of six months, unless otherwise agreed in writing by the planning authority. This will be secured by a condition of planning consent. The applicant must demonstrate how decommissioning and restoration could be achieved at the time of application.

For wind turbines over 42m, prior to the issue of planning consent the planning authority will require the landowner and any other parties with a legal or financial interest in the scheme, to enter into a legal agreement to secure appropriate decommissioning and restoration of the site and any relevant offsite works including delivery of a financial guarantee such that no decommissioning or restoration costs risk falling to the Council. To inform the decision on the level of financial guarantee required, the applicant may be required to commission advice from an independent, suitably qualified contractor, the selection and terms of reference of which must be agreed with the Council.'

As per previous comments, it is not clear if the Council expects the financial guarantee to be made with the Council or just that one is put in place between the applicant and landowner. Either way it should not be a requirement prior to issue of consent, rather a requirement forced by an appropriately worded suspensive planning condition attached to a consent.

The timescale of six months for turbine downtime should be extended to twelve months to overcome potential difficulty in replacing components particularly during the winter.

This approach is heavy handed in contrast to the requirement for such financial guarantees on thermal energy generation projects, especially nuclear for which the decommissioning and restoration costs are significant but barely given a mention in Policies PROP EGT1 & EGT2.

3.1.8. PROP EGT1 and EGT2

It is recognised that land at the former Cockenzie Power Station has been identified for use as National Development and that the Torness Power Station is operational for at least 14 more years. A balanced energy generation mix is supported. However, the difference in the policy requirements between these and wind farm developments (WD1-6) is stark. For example, there is no policy or requirement pertaining to assessing landscape and visual effects, carbon balance, effects on water environment etc. and neither is there explicit requirement for decommissioning and restoration bonds to be established, the costs for which will dwarf such costs associated with wind farms.

This is not a levelised, fair or representative situation and undermines the ability of ELC to facilitate the generation of low cost renewable energy whilst supporting the generation of potentially environmentally damaging and potentially higher cost sources of power.

These policies should be amended to ensure that such developments are subject to the very same assessments that wind farm developments are subject to.

4. Summary

FORL welcomes the proposed spatial framework which accords with the direction of SPP. In general, the proposed LDP policies are appropriate albeit with some minor changes suggested. However, the general policy approach taken towards wind energy development does appear more onerous than that for thermal energy developers. This seems somewhat short-sighted given the national drive towards a renewable electricity powered economy.

From:
To: [Local Development Plan](#)
Subject: Proposed Local Development Plan 2016: Consultation Process EDT1
Date: 06 November 2016 19:07:18

Hello,

I wish to comment on, and in doing so, to object to the Proposed LDP 2016 for East Lothian and in particular those elements relating to EGT1 (concerning the future use of the site previously occupied by Cockenzie Power Station and associated land). Having suffered the noise and dirt pollution of the previous industry (power generation) and the crackling overhead cables, it is now time for the Prestonpans / Cockenzie / Port Seton) area to be used to generate revenues and employment via non-industrial based usages. The coastal area is an area of natural beauty and this should be exploited to generate revenues and employment via businesses such as leisure, education and tourism.

The battlefield site should be treated as a military cemetery and developed as a tourist / historical site with a visitor centre and signposted walks. The other areas should be developed to exploit the visually (e.g. on the A1) promoted Golf Coast, concentrating on attracting golfers from around the world. When coupled with the battlefield site we will have an area of historical (battlefield / Wagon Way / Edinburgh), cultural (Edinburgh), natural / environmental (protected coastline and offshore attractions such as the Bass Rock) and leisure (golf, walking / hiking / cycling / windsurfing and sailing); overall a brilliant opportunity to put East Lothian on the map for all the right reasons. The area needs to shake off the industrial image which should be replaced with an international reputation for leisure, education, tourism and natural beauty.

Along with many other local residents I am proud of the stunning beauty of our local coastline and we have a duty to preserve this not only for the present but also the future. Industries come and go, they become superseded but history, education, leisure, tourism and natural beauty, if preserved, live on with each generation of locals and visitors.

Please register this correspondence as part of the consultation process.

Yours sincerely

Brian Hall

Dr Brian Hall

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-06 19:40:54**

About You

1 What is your name?

First name:

Tony

Surname:

Thomas

2 What is your email address?

Email address:

tony@apt-plandevelop.co.uk

3 Postal Address

Address:

apt planning & development ltd.

6 High Street

East Linton

East Lothian

4 Please enter your postcode

Postcode:

EH40 3AB

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

Developer/ agent/ landowner

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

Organisation:

For Wemyss & March Estate

Your role:

Consultant to WME

7 Are you supporting the plan?

Yes

If Yes: Please include your reasons for support:

The LDP has addressed many of the major issues facing East Lothian and whilst we respond to the document elsewhere in this consultation process, suggesting changes, it is a very worthwhile and positive document and we are happy to offer our conditional support.

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

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

Modifications(s) sought:

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

Justification for Modification(s):

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

1a Diverse Countryside & Coastal Areas - What modifications do you wish to see made to the Diverse Countryside & Coastal Areas section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Your justification for this will be sought in the next question

Modifications(s) Sought:

Please see note lodged directly by email seeking modifications to Policies DC1-DC7.

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

Justification for Modification(s):

We welcome the changes made to the policies relating to the Diverse Countryside and Coastal Areas but feel that the policy still requires further flexibility to ensure that rural business and development opportunities are not stifled by unnecessarily cautious policy approach.

Paragraph 2.12 of the LDP states:

"there is also a need to support appropriate development that enables East Lothian's countryside and coastal areas to thrive and diversify. This Plan provides clear policy support for appropriate development that is suitable in different countryside or coastal locations to support associated economic activities and way of life".

Unfortunately the judgement of what is appropriate and what is inappropriate remains to narrow to fully exploit opportunities in the rural and coastal areas to ensure a vital and viable future. This is not asking for tacit planning permission to develop across huge swathes of the countryside BUT to permit appropriately scaled and designed development that may maintain dwindling populations, enable farm and business diversification or simply encourage any businesses to establish themselves in rural areas (delivering employment and economic development) providing it is clear that there are no unacceptable environmental or economic impacts.

The suite of DC policies are too prescriptive and need to be made more flexible. Our submission does not claim to be the finished article but the culmination of many months of debate and discussion with ELC through the Rural Voice initiative. We would be delighted to continue to discuss these potential changes, within and outwith the LDP process.

Section 7 - Design (pages 137-141)

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

6b Please give any information/reasons in support of each modification suggested to the Infill, Backland and Garden Ground Development 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):

7a Design Standards for New Housing Areas - What modifications do you wish to see made to the Design Standards for New Housing Areas section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

7b Please give any information/reasons in support of each modification suggested to the Design Standards for New Housing Areas section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

8a Development Briefs - What modifications do you wish to see made to the Development Briefs 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:

8b Please give any information/reasons in support of each modification suggested to the Development Briefs 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) :



Wemyss & March Estate
Response to East Lothian Local Development Plan – November 2016
Diverse Countryside & Coastal Areas

Please find below suggested text for policies DC1-DC7.

We would be delighted to further discuss these changes and they are submitted as a constructive and proactive response to the LDP and following discussions as part of the ***Rural Voice*** initiative.

Policy DC1: Rural Diversification

Development in the countryside, including changes of use or conversions of existing buildings, will be supported in principle where it is for:

- a. Development that will enhance rural economic development opportunities will be permitted provided that they are of a scale and character appropriate to the rural area and well integrated into the rural landscape;
- b. Development proposals will be supported where there is an operational or economic need for the particular countryside location;
- c. Sites outwith settlements may be acceptable where they offer opportunities to diversify an existing business or are related to a site-specific resource or opportunity. This is provided that they will contribute to the local economy through the provision of permanent employment.
- d. Proposals for tourist accommodation will be supported where it can be developed without adverse impacts on the surroundings and neighbouring uses.
- e. In the case of an employment, tourism or leisure use, an element of new build housing may be acceptable as enabling development where the Council is satisfied that
 - i. The wider public benefits of securing the primary use outweigh the normal policy presumption against new build housing in the countryside; and
 - ii. The enabling development is essential, it is the minimum necessary to achieve the primary use and it is not a substitute for normal development funding, including borrowing.
- f. Other business use will also be acceptable where it is of an appropriate scale and character for its proposed location in the countryside, it can be suitably serviced and accessed and there are no significant traffic or other environmental impacts.
- g. Leisure, tourism or infrastructure proposals, provided they have a clear operational requirement for a countryside location that cannot reasonably be accommodated within an existing urban or allocated area or, in the case of a proposed development within the undeveloped coast, that cannot be accommodated elsewhere and any potential detrimental impact is outweighed by its social and economic benefits;



Wemyss & March Estate
Response to East Lothian Local Development Plan – November 2016
Diverse Countryside & Coastal Areas

Proposals must also satisfy the terms of Policy NH1 and other relevant plan policies including Policy DC6. Proposals for mineral extraction and renewable energy will be assessed against the other relevant policies of the Plan. Any proposals for the restoration or conversion of vernacular buildings to accommodate uses supported in principle by this policy should be of an appropriate scale and character and designed in such a way that maintains or complements their layout and appearance.

Policy DC2: Conversion of Rural Buildings to Housing

Conversion of appropriate buildings in the countryside to residential use will be supported where:

- a. The building stands substantially intact (normally to at least wall-head height) and requires no significant demolition. In order to be satisfied that the existing structure is suitable for the change of use or the conversion, without significant demolition, the Council must be provided with credible evidence of the building's structural stability at the time of the planning application, and
- b. The existing building is physically suitable for the proposed use and any extensions or alterations are compatible with and do not harm any significant architectural or historic features of the building and are in keeping with its size, form, scale proportion massing and architectural character;
- c. In the case of a farm steading conversion, a limited amount of new build may be acceptable where
 - i. it reinstates a part of the original steading group demolished or altered by later development alien to its character and appearance, where there is clear physical and/or historic evidence of the original form, or
 - ii. it is a logical extension to an existing part of the steading that would provide a completeness to the steading's overall composition that it in keeping with its scale, form and character and
- d. In the case of a change of use of a building to a house or houses, the existing building is worthy of retention by virtue of its architectural or historic character;
- e. In the case of the change of use of agricultural buildings to housing, the change of use must involve the whole building group, and
- f. In the case of a change of use to garden ground, any well-defined settlement boundary or landscaped edge must not be prejudiced, the area of change of use must be small in scale and the terms of Policy DC1 Part 5 must be met.
- g. in all cases, the materials used on the exterior of the new buildings are sympathetic with those of the existing buildings proposed for conversion;



Wemyss & March Estate
Response to East Lothian Local Development Plan – November 2016
Diverse Countryside & Coastal Areas

Policy DC3: Replacement Dwellings in the Countryside

Proposals for replacement dwellings in the countryside will be supported in principle where they would:

- (i) be a like for like replacement of a dwelling recently rendered uninhabitable by unforeseen circumstances, such as a demonstrable and accidental fire, provided there is compelling evidence that the loss of the original habitable dwelling was recent and that it benefited from lawful use as a dwelling immediately prior to the loss; or
- (ii) replace an existing dwelling with lawful use rights as such (not the plot of a previous, now demolished house) that the Council accepts that due to the construction of the building it is incapable of retention for habitation and that all reasonable efforts have been made to maintain the building.
- (iii) Renovation or replacement of homes (where it can be proven that the existing home is unable to support modern living); that the carbon footprint of the proposed new house will be significantly lower than that of the original; the scale of the new house is broadly similar; and original materials are reused as far as possible;

Applicants must submit credible evidence at the time of the planning application to demonstrate compliance with this policy as relevant. Any replacement dwelling must be similar in size, scale and massing to the original and would be of an appropriate character for its location.

Policy DC4: New Build Housing in the Countryside

- a. Housing in the Countryside will, in principle, be acceptable where it is directly related to agriculture, horticulture, forestry and countryside recreation and where no appropriate existing building is available.
 - i. Where satisfied that a new house is justified by an operational requirement, it will be a requirement that the applicant and, where different, the landowner enter into a Section 75 Agreement with the planning Authority
 - ii. To tie the proposed house to the business for which it is justified and
 - iii. To restrict the occupancy of the house to a person solely or mainly employed, or last employed, in that specific business, and their dependents.
 - iv. Where a business or agricultural use is not yet established seeks to justify an operational requirement for an associated house, the Council will either grant temporary planning permission for temporary accommodation, or condition any consent such that, in both cases, permanent accommodation will only be permitted once the business use is established and that permanent



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Response to East Lothian Local Development Plan – November 2016
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- accommodation is justified. In such situations the requirement for the above Section 75 Agreement will then apply.
- v. Applications must be accompanied by a statement justifying the direct operational requirement for the house. The Council may take independent advice as to this requirement.
- b. The Council will also support proposals for the erection, or creation through conversion, of single houses and groups of houses in the countryside which fall into at least one of the following categories;
- i. Building groups
- Allowing one/two new dwelling(s) during a plan period where there are 5 existing units
 - Where the site is well related to an existing group of houses or buildings that are capable of conversion to residential use;
 - Where the cumulative impact of the whole development and the completed group of buildings will be taken into account and where development does not adversely affect their character or that of their surroundings;
- ii. Appropriate infill sites.
- iii. Conversion or replacement of redundant non-domestic buildings (with similar stipulations as (iii));
- iv. Development on rural brownfield land;
- c. In more rural areas, development may be acceptable where it would result in tangible community, economic or environmental benefit. In such circumstances the sense of place and the rural character of the proposed development will be a prime consideration.

Exceptional approvals may be granted where there is an identified shortfall in the 5 year housing land supply and the development represents a logical extension to an existing settlement, is an appropriate scale and does not prejudice the character, visual cohesion or landscape setting of the area.



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Policy DC5: Housing as Enabling Development

Housing in the countryside may exceptionally be supported as enabling development where it will:

- a. enable a desirable primary use supported in principle by criterion b of Policy DC1 and the benefits of the primary use outweighs the normal presumption against new build housing in the countryside; or
- b. fund the restoration of a listed building or other building with recognised heritage value, or other significant designated feature of the built or natural environment, the retention of which is desirable. Proposals must also protect or enhance the setting of such features and satisfy the terms of Policies CH1 and where relevant, CH6;
- c. the proposal satisfies the terms of Policy NH1.

Any enabling development must be on the same site as and part of the main proposal.

In all cases, the benefits of the proposed development must outweigh the normal presumption against new build housing development in the countryside. The Council will obtain independent advice on the extent of enabling development to ensure that it is the minimum necessary to achieve the primary use and it is not a substitute for normal development funding including borrowing.

Policy DC6: Development in the Coastal Area

Development proposals in the coastal area will be assessed against the relevant qualities of the coastal area in addition to all other relevant Plan policies. Where it is proposed on the:

1. Developed Coast it will be supported in principle if it complies with other relevant Plan policies;
2. Constrained Coast it will only be supported if it requires a coastal location;
3. Largely Unspoiled Coast it will only be supported if there is an established need for the development and a specific need for that particular coastal location.

Coastal developments are likely to be subject to Habitats Regulation Appraisal (unless these are directly related to the management of the nature conservation interests of the Natura 2000 sites).

Where a development proposal has a likely significant effect on a Natura 2000 or a Ramsar site either alone or in combination with other plans or projects then proposals must be accompanied by project specific information to inform an Appropriate Assessment. This will allow the competent authority to complete and Appropriate Assessment to determine if there are any adverse effects on the integrity of a Natura 2000 or Ramsar site.

The siting and design of new development must respect the qualities of the particular coastal location.



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Policy DC7: Development in the Edinburgh Green Belt

New built development will only be permitted in the Edinburgh Green Belt where necessary for:

1. agricultural, horticultural or forestry operations, including community woodlands;
2. an extension or alteration to an existing building, or ancillary development within its curtilage;
3. a national requirement or established need, if no other suitable site is available;
4. a replacement house (supported under Policy DC3); or
5. essential infrastructure.

Proposals should be of a size, scale and nature that do not harm green belt objectives or the character or appearance of the local area.

Changes of use will be acceptable in principle subject to other relevant Plan policies.

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

6th November 2016

Dear Sirs

**Proposed Local Development Plan 2016
Response on behalf of Scottish Wildlife Trust**

I am responding to the proposed Local Development Plan on behalf of the local group of Scottish Wildlife Trust (the Trust).

Para 2.47 and 2.48 Levenhall Links

The Trust welcomes Prop MH18 to continue to manage the land at Levenhall Links to Prestonpans to 'improve the availability of suitable habitat for qualifying interest for the Firth of Forth SPA'. However the Levenhall site is of a wider wildlife interest than just the qualifying interest of the SPA. This statement seems rather limiting in terms of proposed management. There is potentially valuable grassland habitat for example. We would like to see a broader statement of the management of the site.

The Trust would like to see a commitment to creating **a Local Nature Reserve** at Levenhall to build on the local interest and support for the site and to enhance and develop the valuable management already carried out at the site by Scottish Power and the Council.

The Main Issues Report (para 6.26) mentioned that there may be opportunities to create a Local Nature Reserve (LNR) at this location. This was supported by the SWT in our comments on the Main Issues Report. It is disappointing to note that this proposal is not carried forward into the LDP

Para 5.24 and 5.25

The Scottish Wildlife Trust welcomes the intention to adopt a Green Network Strategy and notes that the Council 'will have regard for the Green Network Strategy when assessing planning applications.'

The Trust suggests that the preparation of the Strategy is a priority in light of the considerable extent of the proposed development in the LDP (and development already underway) in order to maximise the opportunities to create and enhance green infrastructure.

The Trust hopes that sufficient resources within the Council are available to prepare the Strategy. There is a risk the pace of development may overtake the preparation of the Strategy.

Para 6.11 Local Nature Conservation Sites, Local Nature Reserve and Country Parks

New Biodiversity Sites. The Trust notes the new Biodiversity Sites and has previously commented on the selection process. We welcome the protection given in policy NH3.

Para 6.14 The East Lothian Biodiversity Action Plan (ELBAP)

The Trust welcomes the proposal to refer to the ELBAP in considering planning applications but notes that the current plan ran out in 2013. The Trust would like to see a commitment to the updating of the plan and some indication of how it will link in the proposed Green Network Strategy.

Para 6.16

The Trust welcomes the statements in para 6.16. The Plan has extensive areas of land especially in the west around Musselburgh, committed for development. Whilst the loss of land is regrettable there is an opportunity for habitat creation and enhancement. In this the Green Network Strategy will assist but we hope to see the Council ensuring that landscaping associated with new developments will add value to the environment. The paragraph mentions SNH guidance which we know to be useful. The Trust has also produced guidance for extensive areas under Trust management in Cumbernauld and this may also be useful.

http://cumbernauldlivinglandscape.org.uk/docs/083_385_southcumbernauldcga_greenetworkguidance_webversion_1446561841.pdf

Please do contact the Trust if any points require clarification.

Yours faithfully

Susan Manson

MGS Parent Council
c/o Musselburgh Grammar School
86 Inveresk Road
EH21 7BA

6th November 2016

Musselburgh Grammar School Parent Council's response to the East Lothian Proposed Local Development Plan

General comments

Musselburgh Grammar School Parent Council (MGS PC) is very disappointed with the lack of information in the Local Development Plan (LDP) relating to the provision of education in the Musselburgh cluster, including the lack of financial summaries. We do not believe the option of a second secondary school in Wallyford is the best way forward for the cluster and have already given reasons in our response to the related consultation on that specific matter.

MGS PC has placed a Freedom of Information request to East Lothian Council (ELC) to seek answers to questions we feel were not fully covered during the consultation. ELC was asked very pertinent questions throughout the consultation into the provision of education in Musselburgh and failed to answer these adequately. Unfortunately, the LDP is another missed opportunity to give the community these answers.

We are also concerned that for the LDP to go ahead, an effective solution to the education provision in the Musselburgh area has to be delivered first. As the outcome to the school consultation has not yet been published, let alone been passed at council level, this entire LDP proposal would appear to be flawed. We have already argued that the secondary school outcome in Musselburgh is seen by many people to be pre-determined, and this LDP appears to reinforce our argument.

We also have concerns about the plan's lack of structure, with no focus on enhancing or developing any sense of community, which is important for our young people to develop and thrive. We see this LDP as a series of policies, lacking the cohesion to deliver and create an enlarged community and area which will be a great place to live and work.

Lack of educational impact summary in the proposal

The LDP does not contain a consolidated summary on education provision, which is disappointing given the impact the unprecedented level of population growth proposed for Musselburgh will have on this sector within our community. The period of change and disruption will be experienced by at least two generations of school pupils.

The way the plan is presented is very difficult for lay people to read and piece together. Information is scattered throughout the numerous and extremely lengthy LDP documents. This has resulted in a significant level of work for volunteers having to read through and interpret all the documents in order to identify what the implications may be for our schools and the wider Musselburgh community.

Objections to the proposal for a new, second secondary school

MGS PC's opposition and objections to a new, second secondary school still stand and the LDP appears to be lacking in information with respect to the following.

- An explanation of how ELC intends to minimise or avoid any adverse effects that may arise from the proposal, in particular in respect to the pupils at MGS.

- An assessment of the likely effects of the proposal on the pupils of any affected school and the pupils of any other schools in the area.
- Clear reasoning that the proposal is the most beneficial in educational terms and details of specific benefits Musselburgh and its communities.
- Any detailed consideration of the financial implications and lack of supporting evidence in respect of costs for the proposal, including consideration of longer term financial implications.

Our preferred option for secondary education

The preferred option of MGS PC is a single secondary school, built in a manner that would cater for future fluctuations and be flexibility in use, would offer governance benefits and savings in terms of a single management structure (only one head teacher salary, etc), enable the educational and curriculum choices available to young people growing up in our community to be widened, with equality of educational provision and opportunity irrespective of where they live.

We have grave concerns that building a second secondary education establishment in the Musselburgh area would disadvantage the existing Grammar School. The new school would have many advantages that come with a new build, and we have not had any reassurances from ELC that money would be put into MGS to ensure two schools of equal standing.

We note the figures contained within the Draft Developer Contributions Framework. As parents, we consider it is reasonable to expect that MGS will receive sufficient investment in resources and capital infrastructure from ELC during the development period to ensure our pupils receive an equitable educational experience and similar opportunities to those who will be attending the (proposed) new secondary school, should that proposal be implemented. In this case, although we understand the financial constraints being faced by ELC, we seek assurance from ELC that, along with the new secondary school, MGS would benefit either directly or indirectly from the financial gains that will accrue to ELC from developers' contributions, particularly those that come from house building within the MGS catchment areas.

Pupil Number Projections

Given that the current funding model for secondary schools is based on school roll, we have concerns over the reliability of school roll number projections throughout the development period, how numbers will fluctuate at MGS as developments progress (both house building and the proposed new school) and the risks and challenges this presents to MGS' management team in terms of the ability to financially plan and manage teacher numbers. We are particularly concerned that, in the absence of appropriate support at ELC's Educational Department level, restrictions on the curriculum may arise as a result of management having insufficient resources to replace staff members as and when required due to (temporary or otherwise) dips in the school roll.

We want to ensure the significant increases in attainment recently achieved at MGS are not just maintained, but built upon. All MGS stakeholders (management, teachers, staff, pupils and parents) need to have confidence that ELC shares and supports our vision to be one of the best schools in Scotland and will provide appropriate and flexible support over the period of implementing the LDP, both financially and to the management and staff in the school. Parents need to be able to have confidence in ELC and its ability to provide the very best education for our young people. It is our view that the LDP does not give us this confidence as it does not provide sufficient information to allow us to conclude that the most appropriate options for our community are being proposed. We ask for more detail on how ELC will mitigate financial and planning risks, e.g. by adopting a more flexible approach to funding secondary educational establishments that is not solely based on pupil numbers.

We ask also for information on how 'optimism bias' has been addressed within the LDP, specifically what analysis and planning has been made to ensure educational provision within Musselburgh generally, and MGS in particular, will not suffer should developments not progress at the rate planned (in particular the new secondary school provision).

We also have concerns about long-term school roll projections beyond 2030 given the significant level of investment ELC will be making to the school capital estate. For example, once the families that have moved into the new housing proposed in the LDP have grown up, how confident is ELC that there will be sufficient numbers to sustain two secondary schools? Whilst in the short to medium term the two school solution may seem a good option, it would fail to be so should Musselburgh end up with two schools neither of which are able to run at capacity or efficiently. We look to councillors to make brave and innovative choices that will strengthen the educational experience of future generations within Musselburgh, not just for short to medium term benefit, or in response to short-term financial or political pressures.

Summary

We do not support the proposed LDP and are concerned that it does not demonstrate a plan that will deliver a better future for our children or our communities. We have already outlined our educational concerns regarding the LDP, but we also believe that the implementation of this LDP will lead to reduced standards of living for the following reasons.

1. Physical infrastructure, such as roads, parking, utilities provision and public transport, is not in place to support the population growth and there is no mention of how this will be enhanced to cope.
2. Public services provision, such as doctors, dentists, police, already cannot cope with population growth and there is no mention of how these services will be enhanced to cope.
3. Most of the green belt areas around Musselburgh will be eliminated and no effort has been made to protect green corridors, ensuring nature and wildlife continue to thrive.
4. There is no mention of our town's unique culture and heritage or how this will be retained in the context of significant population expansion. There is no additional provision for community centres and associated facilities, such as a new sports centre to cater for more people.
5. There is no mention of how to combat the pollution problem in our town centre.

MGS PC believes that the LDP consultation, whilst no doubt meeting statutory requirements, is not designed to present information cohesively or in a way that is easy to read, making it very difficult to properly engage the general populace and elicit their views.

For all these reasons, MGS PC is emphatically opposed to the LDP in its current form.

Yours sincerely,

On behalf of Musselburgh Grammar School Parent Council

Gaynor Allen, Co-chair

Sean Elliot, Co-chair

Pam Stott, Vice Chair

From:
To: [Local Development Plan](#)
Subject: Development of Dryden field In east saltpun
Date: 06 November 2016 21:44:24

From: elise cachat >;
To: Elise Cachat ;
Subject: Development of Dryden field In east saltpun
Sent: Sun, Nov 6, 2016 9:25:02 PM

To whom it may concern,

As a resident of East Saltoun I would like to respond to the Dryden field proposal.

First, the scale of the development seems unrealistic as it would almost double the population of the village, affecting its nice rural character.

Second, would the council insure that proper infrastructures are developed to support the growth of the village: public transport, play areas, mobile and internet networks, etc. ?

Third, would the council make sure the village is safe for our children to cross over. In particular, would safe crossings be installed to allow children to travel safely from the east part, the west part and now the south part of the village through busy country roads?

Fourth, would the council support the expansion of the school and it's nursery to be able to house many more children ?

In summary, should help us update and improve the village infrastructures before thinking of developing it further.

Sincerely,
Elise Cachat

From:
To: [Local Development Plan](#)
Subject: Parkview Easter Pencaitland PROP TT14
Date: 06 November 2016 22:05:21

Dear sirs,

have been aware of the intent of the 2008 local plan for 30 units. I am also aware that this site had become land locked for the Council and that by reference to the extent of land now included in the site, the area of the site has increased considerably with access now to be gained from the B6355.

With the increase to 55 houses and the 2 other new housing announcements for Pencaitland; i.e. Woodhall Road and Lempockwells Road; another almost 200 additional houses in a village with next no committed public amenity alongside is a real concern.

The introduction of Vinefields, The Green and Millway brought little additional amenity and the thought of another large tranche of housing without demonstrated thought of social infrastructure is alarming; another heartless dormitory village in East Lothian?

Specific concerns are as follows:

- The council has clearly had to acquire additional land at Parkview. At what cost was this and what assurance can be delivered that an excambion arrangement has not been made with adjacent landowners to enable further development in the Parkview vicinity?
- The cross roads at the A6093 and the B6355 have very poor visibility and the burden of vehicles from another 55 houses using this junction at various times needs to be demonstrated as having been examined and costed with the option of physical change being considered to make the junction viable and safe. This is a duty of care matter, not just for the potential residents of the new homes, but for all road users in the locality.
- It would appear that an inconsistency exists within the Local Development Plan draft action programme wherein the stated education "Costs" and "Proportionality" for the Woodall site's 16 houses and the Parkview site's 55 houses are the same amounts. This seems inconsistent to say the least. And of course the impact that the occupants of 186 new houses will have on the existing (and already extended) primary school facility again causes great concern.

In summary, I have no difficulty with the concept of additional housing within the village of Pencaitland provided amenity provision can be demonstrated, necessary road safety measures achieved and lastly, a high standard primary school maintained.

Alistair Kettles
Director

From:
To: [Local Development Plan](#)
Subject: Saltcoats(NK7), Fenton Gait East(NK8) & Fenton Gait South (NK9)
Date: 06 November 2016 22:10:57

I request that the above be removed from the proposed LDP as sites for housing development. The cumulative impact of such a development is unsustainable for a variety of reasons as follows:

- 1 The existing road network is not capable of handling such an increase in traffic.
- 2 Public transport, particularly the trains, are not able to handle existing numbers of passengers at peak times never mind a substantial increase in numbers. Both Drem & Longniddry stations are at full capacity.
- 3 The cumulative impact of such a sizeable development has not in my view been properly assessed.
- 4 There is little local employment resulting in most of the new residents commuting into Edinburgh increasing traffic congestion on the A1 and other routes.
- 5 The impact on existing services particularly the school & medical services has not been properly investigated and given the on-going shortage of doctors is not sustainable.
- 6 It is an over-development of the village which is unrealistic resulting in a 30% growth in the village population.

Regards

G K Sims

From:
To: [Local Development Plan](#)
Subject: Objection to Local Development Plan proposals
Date: 06 November 2016 22:35:18

To whom it may concern

Ref: Local Development Plan proposals for NK7, NK8, NK9

I am writing to lodge my objection to the Local Development plan with relation to the extent of housing development proposed for Gullane, with four sites earmarked for development representing some 300 new houses, which appears disproportionate to the current size of the village and does not take account of existing constraints on infrastructure, transport links, and limitations on local employment opportunities. The suggestion that all four developments be given the go ahead in parallel seems short sighted, and this sudden change in the scale of the village would not allow for the gradual evolution of services to meet this increased population.

It would seem sensible to instead consider a phased approach, allowing a gradual step change in population, parallel step changes in service provision and infrastructure and the chance to withdraw commitment to developing all the options until the impact of a more measured increase in housing has been assessed.

I would be fully supportive of more measured development of housing stock in Gullane – specifically if (a) focused on the redevelopment of the brownfield Fire College (NK6) site first (in preference to destroying green field sites on the village periphery) and (b) focused on much needed affordable houses, rather than the luxury family homes proposed by Cala. I would therefore be supportive of proposal NK6 being the priority for development in Gullane with an proportionate c.100+ homes, but would strongly request NK7, N8 and NK9 (together 219 homes) be removed from the plan at this stage, allowing future reconsideration when the impact of an initial 100+ houses on the village’s services and infrastructure (including transport links) has been assessed, then allowing further new housing sites to be released in a phased manner.

Overall at present the cumulative impact of all four developments would be significant and detrimental to village life and its primary tourism industry, would impact primary service provision (medical and education) and would put unacceptable pressure on transport infrastructure (in terms of increased commuting into Edinburgh, given the nature of the proposed homes and limited local employment – increasing road traffic and rail congestion at peak times). Developing this level of additional housing stock in a small village such as this would be against the principles of sustainable development for a rural area.

I note that the Local Development Plan states *“The overall capacity of all the sites in the Local Development Plan housing land supply is in excess of the 10,050 home Housing Land Requirement set by the SDP. This takes into account the amount of development that could take place on sites within the plan periods and to provide a generous supply of*

housing land so the SDPs requirements can be met, in line with Scottish Planning Policy. It is also reflects that the allocations selected would allow development to take place in the most appropriate locations, even if their capacity means development could continue into the longer term. As such, some sites may not be fully developed within the plan period and may continue to be developed beyond 2024.”

I would thus urge the Council to consider putting some of the four proposed housing development sites for Gullane on hold, to ensure the village is not impacted disproportionately due to the likely focus on developing all greenfield sites proposed. By prioritising the Fire College in the Local Development Plan, the Council could ensure that this site - which needs redeveloped - is not left as an eyesore on the approach to the village, whilst green field sites are destroyed. Thus I would urge the Council to take a phased approach to development in the village, rather than approving all four sites at once.

Yours faithfully

Abigail Edmondson

REPRESENTATION Ref: WAD/ 1

TO East Lothian Council ON

Proposed Local Development Plan 2016

Thank you for providing the opportunity to comment on this proposed plan.

ARGUMENT:

Para 6.39 in the Cultural Heritage section

“Planning decisions will be taken in accordance with the advice contained in national historic environment policies and guidance”, is a diffuse statement of no help to a would be applicant proposing to alter an historic building, also since the most appropriate advice is in a current series of HES Guidance Notes, those that are not yet published, will become Supplementary Guidance, and this must be clearly indicated in the Written Statement in accordance with para 1.6.

SUGGESTED ADDITION TO END OF PARA 6.39

“In particular the current series of HES Guidance Notes published periodically, on managing change in the historic environment, set out the principles that apply to the alteration of some aspects of historic buildings. Each should inform planning policies and the determination of applications relating to the historic environment, and replaces the equivalent guidance in *The Memorandum of Guidance on Listed Buildings & Conservation Area (1998)*. All these HES policies and guidance notes as they are published, will be material considerations in planning and/or Listed Building Consent decisions thereafter.”

Submitted by:

Mr W A Dodd,

6 Nov 2016

REPRESENTATION Ref: WAD/ 2

TO East Lothian Council ON

Proposed Local Development Plan 2016

Thank you for providing the opportunity to comment on this proposed plan.

ARGUMENT:

In the '*FORWARD*' the Council's 'Spokesperson for Environment' writes that. 'It is vitally important that we conserve East Lothian's special qualities for future generations'; and this message of urgency reflects the statutory requirement to preserve buildings of special architectural, historic or archaeological interest for future generations, and apparently also in para 6.37 of the proposed LDP, which boasts that, " East Lothian has around 2,700 properties or structures", which are Listed Buildings [LB's]. The Listing section of the former Historic Scotland, and the new 'Designation Team' of HES, are each a dedicated body busily searching out fresh buildings of special interest and correcting judgements on existing LB's, in an on-going dynamic operation to safeguard in the face of pressure from the accelerating speed of development, worthy examples for the benefit of future generations; and it is to be presumed that East Lothian gets its share of new designations and corrections. In this context it is surprising to find that the number of LB's in East Lothian given in the 2008 ELDP, para 4.12, is an identical "approximately 2,700 buildings", and this is now being implied to have remained unchanged over the lapse of the last eight years.

A fundamental fault in this proposed ELDP is the short peremptory treatment of the Historic Built Environment, paying lip service to statutory requirements, but regarding it as a minor static restraint on free-wheeling development to deliver the council's quota set by Scottish Ministers. This is in sad contrast to the vision set out by Scottish Ministers in *OUR PLACE IN TIME The Historic Environment Strategy for Scotland*. Their VISION is that, 'Scotland's historic environment is understood and valued, cared for and protected , enjoyed and enhanced. It is at the heart of a flourishing and sustainable Scotland and will be passed on with pride to benefit future generations.'

SUGGESTED ADDITION TO PARA 6.37

"Monitoring of the numbers of, and alterations to Listed Buildings, in extent, nature and spatial distribution of cases, will form part of an annual audit of East Lothian cultural assets, to guide the Council in the formulation of statutory Supplementary Guidance on policies for their protection, repair and conservation. Such policies will be material considerations in planning decisions."

Submitted by: Mr W A Dodd,

REPRESENTATION Ref: WAD/ 3

TO East Lothian Council ON

Proposed Local Development Plan 2016

Thank you for providing the opportunity to comment on this proposed plan.

ARGUMENT:

The statute which created Listed Buildings made it the duty of [Scottish] Ministers to compile A LIST of buildings of SPECIAL architectural or historic interest, with a view to their effective protection as part of the nation's heritage. Either a building is 'Listed' or it is not : there is no alternative status. The word 'special' distinguishes this class of building as a subject of the Act of Parliament. In Scotland the categories 'A', 'B' and 'C(s)' were introduced for administrative reasons, and now indicate the estimated cultural value in a geographical analogy of as of: A – National or wider interest; B – Regional interest, and C – Local interest. All such buildings remain LB's regardless of their category. Generally less than 10% of LB,s are Category A; a much greater number are Category B, but more than half of the total are Category C(s). [Originally the number at Category C proved to be so great that a review was imposed to chose only the best, which are designated C(s), and only those remain as statutory Listed Buildings.] It was expected that Councils would adopt special policies for the 'non-statutory C' buildings of less than Special interest, in a LOCAL LIST, but this seldom happened, and the buildings once more took their place in the mass of buildings in a gradation of increasing architectural or historic interest which had always existed, leading up to that standard artificially denoted 'SPECIAL' for the purpose of the Act of Parliament, but the great number of buildings of Local Interest are important to the character of our towns, villages and favourite places, whether or not they are designated as conservation areas.

Originally all alterations to LB,s had to be submitted to the Ministry's expert architects for approval, then later this was required only when a Local Planning Authority (LPA) was minded to grant consent. Finally HS were told to entrust LPA's with this expert work according to the Category of the LB and the competence of the LPA's staff. Para 6.42 of this proposed LDP states that HES will only be consulted on planning applications that will affect a Category A LB or its setting, and applications for LBC for works to Category A and B LB's. [In the 2008 LDP it was stated that all demolitions of LB's still had to be approved by Ministers, but this is not noted in the proposed LDP.]

The section of this proposed LDP, dealing with Listed Buildings, and with Local List buildings is wholly inadequate, because over half of the boasted 2,700 LB's in East Lothian, are of Category C(s), and yet there is no mention of their existence, or of any arrangements proposed for dealing with the statutory business of their future

preservation, conservation and monitoring, by suitably qualified and experienced officers , who as a minimum qualification should be full members of the Institute of Historic Building Conservation.

SUGGESTED ADDITION TO PARA 6.42:

“ The Council as LPA will adopt as its special responsibility, the Category C(s) Listed Buildings of East Lothian, which can be regarded as peculiarly of Local but special architectural or historic interest, and it will provide effective means for their better conservation and interpretation as common cultural assets, to be passed on to future generations.”

“Similarly, a Local List of buildings of architectural or historic interest in East Lothian will be compiled with the help of local societies and knowledgeable persons, so that buildings which are important to the character of East Lothian can be recorded and protected. In regard to alterations to such buildings any applicant must undertake and make available to the planning authority a professional survey and historical analysis, produced by a building archaeologist.”

Submitted by: Mr W A Dodd,

6 Nov 2016

REPRESENTATION Ref: WAD/ 4

TO East Lothian Council ON

Proposed Local Development Plan 2016

Thank you for providing the opportunity to comment on this proposed plan.

ARGUMENT:

Ref. Page 121, "Policy DC5: Housing as Enabling Development."

This practice is an abuse of the planning system, and should no longer be tolerated. The aim of this development plan is to ensure that houses are provided where they are planned to be, carefully balancing need, infrastructure and amenity, but this practice is the antithesis, and introduces a "wild card" of irrational, unplanned development. It also condemns a group of ratepayers to live for the next 60 years in an isolated development, lacking in most local amenities, on a site made sustainable only by infrastructure costs and council services considerably higher than elsewhere, and made bearable only by using cars. The practice must be abandoned, and the Council should directly grant aid deserving developments, and as LPA it should no longer misuse the planning system as an indirect financial encouragement, on the cheap, regardless of the misery of the lives of those living where houses were never planned to be, without identified need or adequate infrastructure, and usually oppressively intrusive in open countryside, on a site chosen arbitrarily by its owner for a quite different type of development, which may have succeed or failed sometime in the past, all on a site he just happened to own.

SUGGESTED REPLACEMENT TO THE TEXT OF POLICY DC5

"Due to advances in planning optimum provision of housing land, the practice of permitting the erection of housing as enabling development, will no longer be supported."

Submitted by:

Mr W A Dodd,

7 Nov 2016

REPRESENTATION Ref: WAD/ 5

TO East Lothian Council ON

Proposed Local Development Plan 2016

Thank you for providing the opportunity to comment on this proposed plan.

ARGUMENT:

Ref page 83, "Policy OS2: Change of use to Garden Ground"

The introductory paragraph 4.124 very adequately explains the many undesirable consequences of this practice, but then the actual policy proposes to support the practice: this is quite irrational, and the tenor of the policy should be reversed, to indicate that this iniquitous and anti-social practice will no longer be supported by the LPA. Put simply, the duty of the LPA is to ensure any housing development includes an adequate extent of open space, to be maintained and enjoyed in common by the householders, thereafter if a householder seeks to fence around and use for his personal enjoyment any part of the common open space as his own garden, excluding all other householders who have rights to enjoy that land, he commits an anti-social act that is probably illegal and is morally undesirable. If he then seeks to 'legalise' this act by bolstering it with planning permission, the practice has been to support his application in accordance with the former Policy allowing Change of use of open space to private Garden Ground. This is patently a robbers' charter, which brings the planning system into disrepute, and the tenor of the policy in the proposed LDP 2016 should be reversed.

Where the land is public open space or amenity land held in trust by the Council for the enjoyment of all ratepayers, the alienation of land to become private garden ground, should not be supported by the LPA.

SUGGESTED REPLACEMENT OF POLICY OS2

"Policy OS2: Change of use to Garden Ground"

"Adequate open space is essential to the health, enjoyment and well being of householders, and the LPA will not support any reduction of open space, due to its enclosure, for its exclusive use as a private garden."

Submitted by:

Mr W A Dodd,

REPRESENTATION Ref: WAD/ 6

TO East Lothian Council ON

Proposed Local Development Plan 2016

Thank you for providing the opportunity to comment on this proposed plan.

ARGUMENT:

Ref page 36: a further case to be added;

The northern defences of the medieval Burgh of Haddington consisted of the Town Wall (now a Listed Building) and a broad "killing field" stretching an arrow-shot outside, kept free of buildings. Council houses have been built over part of this open space but it remains next to the length of the Town Wall running between Victoria Place and Dunbar Road, where the instructive relationship of defensive wall and open ground can still be appreciated. The open ground was a functional part of the burgh defences, and must still be regarded as "the setting" of the (Listed) Town Wall. Proposals have been made to build houses on the open ground, with their rear gardens running up to and making inaccessible the north face of the Town Wall, but the applications were refused by the LPA. A statement of intent to maintain the open character of the land to the north of this part of the Town Wall in future, would be appropriate in the new DLP. Better public access by means of a pedestrian board-walk [so as to protect the roots of trees], along the line of the wall, may be negotiated, and the wall conserved, linking to the Council's own properties at the western end of the wall.

SUGGESTED ADDITIONAL POLICY:

"Policy CH10: Setting of Town Wall, Haddington"

" The northern defences of the medieval Burgh of Haddington consisted of the Town Wall (now a Listed Building) and a broad "killing field" stretching an arrow-shot outside, kept free of buildings. Council houses have been built over part of this open space but it remains next to the length of the Town Wall running between Victoria Place and Dunbar Road, where the instructive relationship of defensive wall and open ground can still be appreciated. No new building within the setting of this stretch of the listed Town Wall will be supported. This site forms part of the landscaped setting of Tenterfield House, a Listed mansion."

Submitted by:

Mr W A Dodd,

From:
To: [Local Development Plan](#)
Subject: Objection to Local Development Plan proposals
Date: 06 November 2016 22:59:48

Ref: Local Development Plan proposals for NK7, NK8, NK9

I am writing to lodge my objection to the Local Development plan with relation to the extent of housing development proposed for Gullane, with four sites earmarked for development representing some 300 new houses, which appears disproportionate to the current size of the village. The suggestion that all four developments be given the go ahead in parallel seems short sighted, and this sudden change in the scale of the village would not allow for the gradual evolution of services to meet this increased population.

As a resident it is very much apparent that the priority should be to develop the brownfield site Fire College site (NK6), but that if all 4 sites are allowed, developers will target the other sites which require less cost and more profit on their part. The danger is that this site is just left to decay, which benefits no one.

This general principle applies throughout the LDP where, not only is the 10,000 target unrealistically high, but the plan even allows for more than this number. Shouldn't planners be directing developers to where the most appropriate development areas are, not letting profits dictate the most appropriate areas.

Given this it would seem sensible to instead consider a phased approach, allowing a gradual step change in population, parallel step changes in service provision and infrastructure and the chance to withdraw commitment to developing all the options until the impact of a more measured increase in housing has been assessed.

Yours faithfully

Duncan Edmondson

To whom it may concern

Ref: Local Development Plan proposals for NK7, NK8, NK9

I am writing to lodge my objection to the Local Development plan with relation to the extent of housing development proposed for Gullane, with four sites earmarked for development representing some 300 new houses, which appears disproportionate to the current size of the village and does not take account of existing constraints on infrastructure, transport links, and limitations on local employment opportunities. The suggestion that all four developments be given the go ahead in parallel seems short sighted, and this sudden change in the scale of the village would not allow for the gradual evolution of services to meet this increased population.

It would seem sensible to instead consider a phased approach, allowing a gradual step change in population, parallel step changes in service provision and infrastructure and the chance to withdraw commitment to developing all the options until the impact of a more measured increase in housing has been assessed.

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-07 15:29:30**

About You

1 What is your name?

First name:

Tim

Surname:

Harding

2 What is your email address?

Email address:

3 Postal Address

Address:

4 Please enter your postcode

Postcode:

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

Local Interest Group

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

Organisation:

cycle forth

Your role:

Member

7 Are you supporting the plan?

Not Answered

If Yes: Please include your reasons for support:

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

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

There is an opportunity to create a shared-use (pedestrian/cycle) route through the northern part of this site, to connect with other routes and form a "southern boundary ring" providing, amongst other benefits, safer routes to the local schools.

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

Justification for Modification(s):

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

Modifications(s) Sought:

There is an opportunity to create a shared-use (pedestrian/cycle) route through the northern and eastern parts of this site, to connect with other routes and form a "southern boundary ring" providing, amongst other benefits, safer routes to the local schools.

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

From: [McFarlane, Iain](#)
To: [Local Development Plan](#)
Subject: FW: NBCC - East Lothian Development Plan
Date: 07 November 2016 09:38:04
Attachments: [NBCC - supplementary response to LDP - Nov 2016.docx](#)

From: Kathryn Smith]
Sent: 04 November 2016 16:31
To: McFarlane, Iain
Subject: NBCC - East Lothian Development Plan

Dear Iain

Following the community council elections on 6th October which saw 7 new community councillors elected to North Berwick Community Council, the new councillors requested a review of the proposed Local Development Plan Response. As a result, a supplementary Response has been prepared and is attached hereto. It should be read in conjunction with the two responses already submitted on 7th June and 22nd September.

Please acknowledge receipt.

Yours sincerely

Kathryn

(Miss) Kathryn E Smith
Secretary, NBCC

NORTH BERWICK COMMUNITY COUNCIL

Supplementary response to East Lothian Proposed Local Development Plan

Submitted 4th November 2016

Introduction

This report is the response of the newly elected (6 October 2016) North Berwick Community Council (NBCC) to the proposed East Lothian Local Development Plan (LDP). It is supplementary to the responses provided by NBCC on 7 June 2016 and 22 September 2016. For the avoidance of doubt, it does not replace the Community Council's previous responses: the three responses are intended to be read in conjunction with each other.

As a newly elected Community Council, we welcome this opportunity to comment further on the LDP. We would also like to acknowledge at the outset the considerable efforts and hard work of East Lothian Council Planning Department in reaching this stage in the LDP process given the many constraints and competing interests which we know they must consider and balance.

A Spatial Strategy for East Lothian

We recognise that most of the land allocations for housing and mixed use in North Berwick have already been approved (2.151-2.164); indeed, several are now in the process of construction. However, we want to make some general comments on this section of the LDP.

Most importantly, we believe the proposed LDP demonstrates **an urgent need to develop a comprehensive Area Plan for North Berwick**. In its absence, the LDP inevitably takes a piecemeal approach, focused on the several parcels of land available now or in the near future around the edges of the town. We would advocate developing a spatial strategy that encourages a long-term view of the future of North Berwick and its community. At present, we do not feel that the community itself is sufficiently visible within the LDP, and issues such as community sustainability, quality of life, and the impacts of piecemeal growth on the historic town centre and the town's infrastructure are not adequately considered.

The LDP approach appears to us to run counter to that of the North Berwick Coastal Area Partnership (NBCAP). This is disappointing given that ELC is to be congratulated in initiating and supporting the establishment and running of NBCAP. We would welcome clarification of how this and future LDPs are intended to reflect and reinforce the work of the Area Partnership and the area plans emerging from the work of the Partnership. We would be very grateful for an opportunity to meet with ELC to explore how the Council could work better with the community in finalising this LDP and co-producing future LDPs and other relevant strategies.

Some examples of issues which we believe could and should be included or considered more fully in this LDP are as follows.

1) The Spatial Strategy in the LDP would benefit from consideration of the proposed final extent of North Berwick. We believe that the town is near capacity in terms of development (including the 800+ new homes proposed in the LDP) if it is to retain its character and sense of place, and be capable of supporting the resident community. In protecting the landscape setting of the Law, the proposed LDP provides for a substantial area of land to remain undeveloped around the southern edge of the town. We welcome this. As well as protecting the Law and providing an area with 'long-term recreation value', we submit that this area is effectively a partial 'green belt' for North Berwick. We would like to see this area protected as a Countryside Around Towns designation (CAT) and extended around the west and east sides of the town - thereby setting a spatial limit on development for the foreseeable future. Once that boundary has been agreed, we would urge ELC to adopt and enforce the principle of no more development on greenfield sites.

2) The LDP does not take adequate account of the impact of new development on the town's ageing infrastructure and its long-term sustainability. It does allocate an area for expansion of educational provision - which we welcome and support - but it does not adequately consider, for example, health provision (already under significant pressure), or the need for new facilities for young and old, for arts and culture, or the impact of 800+ new homes on transport and parking. All of these have been identified as priority issues by the NBCAP - which is exploring a range of possible solutions and creative ideas suggested by the community.

3) The LDP does not adequately acknowledge that the cumulative impact of the new developments will change the spatial layout of the town and impact on the ability of residents, new and old, to access services. It does earmark land for a new local centre at Mains Farm, but the precise function and character of that new centre cannot be determined in isolation from consideration of the range and appropriate locations of a number of new and/or upgraded facilities throughout the town.

4) The LDP does not adequately consider the current and future demography of North Berwick. For example, it does not take account of the implications and opportunities of an ageing population on employment, housing and transport: there is no sense of an *Ageing in Place* policy. One of the most pressing problems for older residents is housing, but the only housing option for older people addressed in the LDP is residential care (section 3.59). This is unsustainable as it can only be available or suitable for an increasingly smaller proportion of older people. Better housing options are preventative and improve quality of life. The LDP needs to consider options for older people to downsize or adapt housing, thereby enabling people to remain in their own homes. *Ageing in Place* advocates a much more inclusive approach to planning and design, for example, looking at how far people have to travel by foot to reach local amenities and social networks - both of which are highly significant to quality of life at all ages and impact significantly on mental and physical health. The principles are very similar to those in Scottish planning policy and guidance, which is very people orientated.

5) Similarly, there is a pressing need for more affordable housing in North Berwick, but this is also not adequately considered in the LDP. At present, it is very difficult for local people to find a home for long-term rent, let alone to buy their own home. One factor contributing to the shortage of housing of all types, but especially smaller homes, is the

growth in second home and holiday home ownership - but this is not touched on in the LDP. We believe that possibly several hundred homes in and around North Berwick are second or holiday homes, which impacts adversely on the housing market and availability of affordable housing for local residents. We would welcome research into the scale and nature of second and holiday home ownership in North Berwick (including properties owned by commercial holiday letting companies). If the findings confirm our view that this is a significant issue for the town and surrounding area, we would urge ELC to consider introducing measures such as those now being adopted in Cornwall (eg. taxing empty homes, second and holiday homes, and setting up a Community Fund to develop more affordable housing). This is essential if the LDP is to begin to address issues of inequality - one of its stated aims.

6) NBCC welcomes the statements made in the section on Design (7), for example, about housing density, infill and garden ground development and design standards for new housing areas, but - on the basis of the developments currently approved or underway - we would question how far they are being applied in practice. North Berwick has a very special character, but this risks being eroded by uniformity in modern developments, lower quality design, low density development and lack of imagination. We would urge ELC to redouble its efforts to ensure that developers adhere to these policies and encourage them to propose more ambitious, creative and sympathetic schemes - fit for a growing community in this beautiful and historic place.

7) NBCC has responded previously (7 June and 22 September 2016) on the specific proposals for employment land in the LDP. However, we believe that an essential first step would be to carry out an audit of the employment and business needs of the town during the life of this LDP, including assessment of the types of business, types of space and preferred locations (for example, digital and creative industries normally require office or studio space, while other trades require industrial units of various sizes; some businesses must be in the town centre to thrive, while others would prefer to be sited around the edges of the town; etc).

In general, we would like to see the LDP taking a longer-term and more wide-ranging view of employment opportunities. As just one example, supporting an ageing population offers significant employment opportunities in many spheres, and is also changing in nature. Care work is currently undervalued, but a 'care academy' or similar could develop both a local care force and a range of different business models for providing care and services for older people. There is an opportunity in the LDP to take an innovative approach to ageing in place - learning from other countries where new approaches have been developed, such as the Netherlands and Scandinavia. It could also, for example, contain more on digital connections, lifelong learning and how employment will change when people are working into their 70s and 80s.

8) The LDP contains no assessment of how the proposed development of the town will impact on community cohesion, resilience and capacity - in short, the social capital of the town. The key to this is provision of opportunities and incentives for people to be out and about in social spaces - which brings us back to the need for a vision and area plan for the town, incorporating a new or upgraded community centre and/or arts centre, a replacement for Space (for young people), spaces which encourage inter-generational activities and contact, etc. NBCC firmly believes that the LDP should be

about developing the community as much as about finding sites for prescribed numbers of new houses.

To conclude, the decisions made today will impact on generations to come, but we do not feel this is adequately explored in the LDP. We would advocate and welcome a more forward-looking and holistic approach to planning for the future of our town - and one which involves the community. ELC has set up a mechanism to help this happen through the NBCAP, but does not yet seem to be working in partnership with the Partnership and reaping the benefits of its investment in NBCAP.

The Community Council would be pleased to work with ELC to address the issues in the LDP identified here. Specifically, we would be pleased to work with ELC and our partners in NBCAP to develop a vision and area plan for North Berwick and nearby settlements. We consider this to be a very high priority given that the proposed LDP is at an advanced stage in the process and given the significant pressures already facing our town and community.

NBCC has seven new members, two of whom are the Co-Chairs of NBCAP, and all of whom bring new skills, experiences and perspectives to the Community Council, to add to those of the re-elected members. If possible, we would welcome a presentation on the LDP from ELC in the near future, together with an opportunity to discuss some of the issues and concerns raised in this report.

“By 2032, the Edinburgh City Region is a healthier, more prosperous and sustainable place which continues to be internationally recognised as an outstanding area in which to live, work and do business.”

Our representation is that in its approach to the planning of Haddington, and elsewhere in the County, the Planning Authority has not acted in a manner likely to achieve these objectives and that the proposed LDP shows little evidence of the level proactivity and foresight necessary to achieve its stated vision over the next 15 years.

Section 2 : A Spatial Strategy for East Lothian

Our concern is that in surrendering to the pressure from Government regarding housing numbers, the Planning Authority has allowed its wider duty to the people of East Lothian to be forgotten. The message received through SESplan, as processed and approved by Government, is a narrow one – that housing numbers are all important and that if these are delivered then that is “job done”. That is not, should not be, a sufficient brief for our LDP.

The Call for Sites approach is open to serious question. It effectively hands the initiative to developers whose agenda is profit driven. Easily developed sites on the edge of existing settlements are likely to be attractive to developers for this reason. The role of the planning authority is to ensure that the public interest is fully taken into account but there is little sign of that in this LDP.

We question the adequacy of this strategy and we submit that it should be closely examined in public in due course. It is important to consider how the planning of the County has been undertaken in the past in order to assess the efficacy of the proposed plan for the future. Affected communities must be involved.

Section 2c : Blindwells Cluster

Policies BW1 and BW2 relate to the proposed new settlement at Blindwells and the allocation of an area for expansion. There is widespread public scepticism that this proposal, in either initial or expanded form, is deliverable and that reliance upon it prevents other imaginative new settlement options to be considered. The Examination should call for evidence regarding the deliverability of Blindwells New Settlement and the setting of a timescale either to prove its soundness as a development prospect or its removal from the LDP.

Section 2d: Tranent Cluster

Prop TT15 : Humbie North proposes the doubling of size of the existing village and consideration should be given to the reduction of the size of this allocation. There is no objection in principle to some new development – this objection is to the scale of expansion proposed.

Section 2e : Haddington Cluster

Our experience in Haddington, which we believe is shared elsewhere in the County, is that the town is growing in size, on unsuitable sites, with poor quality outcomes. It seems that sites promoted by developers are found acceptable in the form submitted and that poor sites are developed, apparently without demur.

Government advice contained in PAN 44 states that “in some places good design will not in itself be enough to offset detrimental effects on the landscape” and that “insensitive development can undermine the special environmental quality of towns and their setting in the countryside”. We understand this guidance to remain in place – but it has, here in Haddington, and elsewhere in the County, been ignored both by the Council as Planning Authority, and on appeal. The omens are not good for the future in which it is envisaged that large numbers of houses will be built in the County, on sites selected by developers and with a permissive attitude on behalf of the Planning Authority.

HADAS objected to the allocation of Letham Mains (PROP HN1 – Letham Mains) at the local plan inquiry 2005 engaging Counsel to conduct its case and calling expert witnesses. The original justification for this site, advanced by the planning authority, was that the site was available, that it was located on the edge of the urban area and that it was “Haddington’s turn”. Our objection was that the Council did not seem to have conducted due diligence in terms of the impact of this scale of development and had not involved the public.. The allocation was confirmed and further land at this location is now included in the plan (PROP HN2 – Letham Mains Expansion). A decade later there is no sign of development.

Land at Dovecot was promoted on behalf of a developer the argument being that Letham had failed to deliver and that their site, to the south, was immediately available. This site is wholly unsuitable for development of any type as it breaches an open area of countryside which forms part of the setting of the town and is prime agricultural land. It is now allocated (PROP HN3 – Dovecot) following a decision on appeal. Instead of snuffing this site out very early in the process the planning authority did nothing with the predictable outcome that the applicant appealed against non-determination. This quite spineless approach has been followed up in the plan with : “in the longer term, the only suitable location for a further significant expansion of Haddington may be in the wider Dovecot area.” One error is seen as the justification for the next.

Land at Alderston (PROP HN7) is allocated for 89 houses to reflect an appeal decision – another instance in the Planning Authority has failed to carry out its responsibilities and has allowed the decision to be made elsewhere.

This representation requests the deletion of any reference in the LDP “to a suitable location for expansion in the Dovecot area” as the only remaining suitable area for the expansion Haddington. The Examination should consider the terms of the DPEA Appeal Decision Ref:PPA-210-2037 and how such a poor decision could be taken relative to the setting of Haddington, the sterilisation of prime agricultural land and without mention of any community view or interest.

Section 3 : Town Centres, Employment and Tourism

Policy RCA1 : Residential Character and Amenity protects housing areas from the adverse impacts of uses other than housing. Proposals for new development will be assessed against other local plan policies.

The Examination should assess the import of this policy when read together with Policy DC8: Countryside Around Town which states that new development must not harm the landscape setting of the countryside location.

Section 3b : Education, Community and Health and Social Care

Policy OS5 includes a cemetery extension at Brierybank, Haddington.

This proposal is objected to as the site is located outside the town boundary. A more appropriately located site should be identified.

Policy Prop OS7 requires that consideration should be given to the provision of allotments in Musselburgh, Tranent and Blindwells Clusters.

This representation requests that similar provision for allotments be made in the Haddington Policy Cluster and that Prop OS7 should be changed accordingly.

Section 4 : Our Infrastructure and Resources

This representation seeks, through examination in public, amplification and explanation of Policy T3: Segregated Active Travel Corridor. The concept is not clear.

Also requested is the inclusion on Strategy Diagram 2 of the Longniddry/Haddington Route Safeguard (T14) in line with the status accorded to East Linton rail proposal (T12).

Section 5 : Diverse Countryside and Coastal Areas

An assessment of the landscape setting of Haddington is overdue – this is particularly urgent in view of the recent development incursions into the countryside surrounding the town, in apparent contravention of Policy DC8 which states that “new development must not harm the landscape setting of the countryside location”. Recent decisions on the edge of the town send out the message that Haddington could grow further to the west.

This representation seeks the inclusion of Clerkington should be designated as designed landscape in line with protection already available to the south and east of the town. Similar consideration should be given to open countryside to the north of the town.

Section 6a : Our Natural Heritage

East Lothian has the richest resource of prime agricultural land in Scotland and an agricultural community of importance both to the national and local economy. We believe that in the land grab encouraged by Government, and supported in the proposed LDP, sites poorly located for development but of prime agricultural quality, are being sacrificed unnecessarily. Scottish Planning Policy (SPP) protects prime agricultural land (80) and states that its development should not be permitted “except where it is essential as a component of the settlement strategy”. Our view is that the sites promoted largely through developer preference do not constitute a development strategy in any meaningful sense and that to sacrifice good quality land is short sighted and not in the public interest. Claims regarding the wish to develop sustainably sound hollow in this context.

We feel that Policy NH7 : Protecting Soils is too narrowly expressed. The agricultural community requires greater acknowledgement in the plan and higher status within a development strategy for the future.

This representation seeks protection of prime quality land in recognition of its importance both national and local economies. It should be one of the important drivers of the spatial strategy and Policy NH7 should be redrafted to reflect this wider strategic significance

Section 6b : Our Cultural Heritage

We support the approach to West Road Field, Haddington outlined at paragraph 6.57. The Society supported a planning application, subsequently granted some years ago, for the development of the frontage to Pencaitland Road. We are therefore in agreement with policy CH6 and would encourage the Council to be proactive in implementing this policy.

Section 7 – Design

Policies DP1 and DP2, relating to Landscape Character and Design are supported in terms of what they say about integration and density. The issue, as will be clear from these representations, is that these policies, similar to those in previous plans, are often not heeded in considering applications.

We believe that there is a number of issues which require to be examined in public including those identified in this representation. We note that there may be no further opportunity to amplify/expand our representations and trust that these representations are sufficiently clear for those arranging the hearing of objections in public.

Yours faithfully

Andrew Robinson
(Chairman)



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

Taylor Wimpey UK Limited
Strategic Land
1 Masterton Park
Carnegie Campus
Dunfermline, Fife
KY11 8PL

T: 01383 845700
F: 01383 845725

www.taylorwimpey.co.uk

02 November 2016

Dear Sir/ Madam

Proposed Local Development Plan 2016
Proposed Housing Site Allocation: TT7 Macmerry North
Online Reference: ANON-ZMS3-3MJH-Y

We refer to the representation made through the Consultation Hub on behalf of Taylor Wimpey in respect of Proposed Housing Allocation site TT7: Macmerry North.

We do not seek a modification and therefore did not know where best to state our comments of support and in this respect we would be grateful if you could include this letter and attached plan with our online representation.

Taylor Wimpey **support** the Proposed Housing Allocation **TT7: Macmerry North**. Taylor Wimpey control the eastern section of the proposed site as shown on the attached plan.

We have undertaken technical due diligence across the site and can confirm that on this basis the site is effective and will be able to deliver new homes within the Local Development Plan period.

Our intention is to work together with the Council and adjacent landowner and at the appropriate time submit a planning application in respect of the area shown on the attached plan.

I trust this is appropriate.

Yours sincerely,
For & on behalf of Taylor Wimpey UK

Andrew Roberts
Taylor Wimpey
Senior Strategic Land & Planning Manager

Taylor Wimpey UK Limited
Registered Number:
1392762 England and Wales.
Registered Office:
Gate House, Turnpike Road
High Wycombe, Buckinghamshire
HP12 3NR

Response ID ANON-ZMS3-3MJH-Y

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

Submitted on **2016-11-02 13:11:39**

About You

1 What is your name?

First name:

Andrew

Surname:

Roberts

2 What is your email address?

Email address:

andrew.roberts@taylorwimpey.com

3 Postal Address

Address:

Taylor Wimpey Strategic Land
1 Masterton Park,
South Castle Drive,
Dunfermline,
Fife, KY11 8NX

4 Please enter your postcode

Postcode:

KY11 8NX

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

Developer/ agent/ landowner

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

Organisation:

Taylor Wimpey

Your role:

Senior Strategic Land Manager

7 Are you supporting the plan?

Yes

If Yes: Please include your reasons for support:

Taylor Wimpey Support Proposed Residential Allocation TT7: Macmerry North as an effective proposed housing site which can deliver new homes over the plan period.

Taylor Wimpey control the eastern parcel of TT7 with access from Chesterhall Avenue. It is our intention to work with East Lothian Council and the adjacent landowner who controls the balance of Proposed Allocation TT7 with a view to addressing any development related impacts as appropriate and to ensure the site respects and is well integrated with the existing settlement.

Section 2d - Tranent Cluster Strategy Map (pg 31)

1a Strategy Map for Tranent Cluster - What modifications do you wish to see made to the strategy map for the Tranent Cluster in the Plan?

Please state all relevant paragraph numbers of the proposed plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

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

Justification for Modification(s):

Proposals Map

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

Modifications(s) Sought:

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

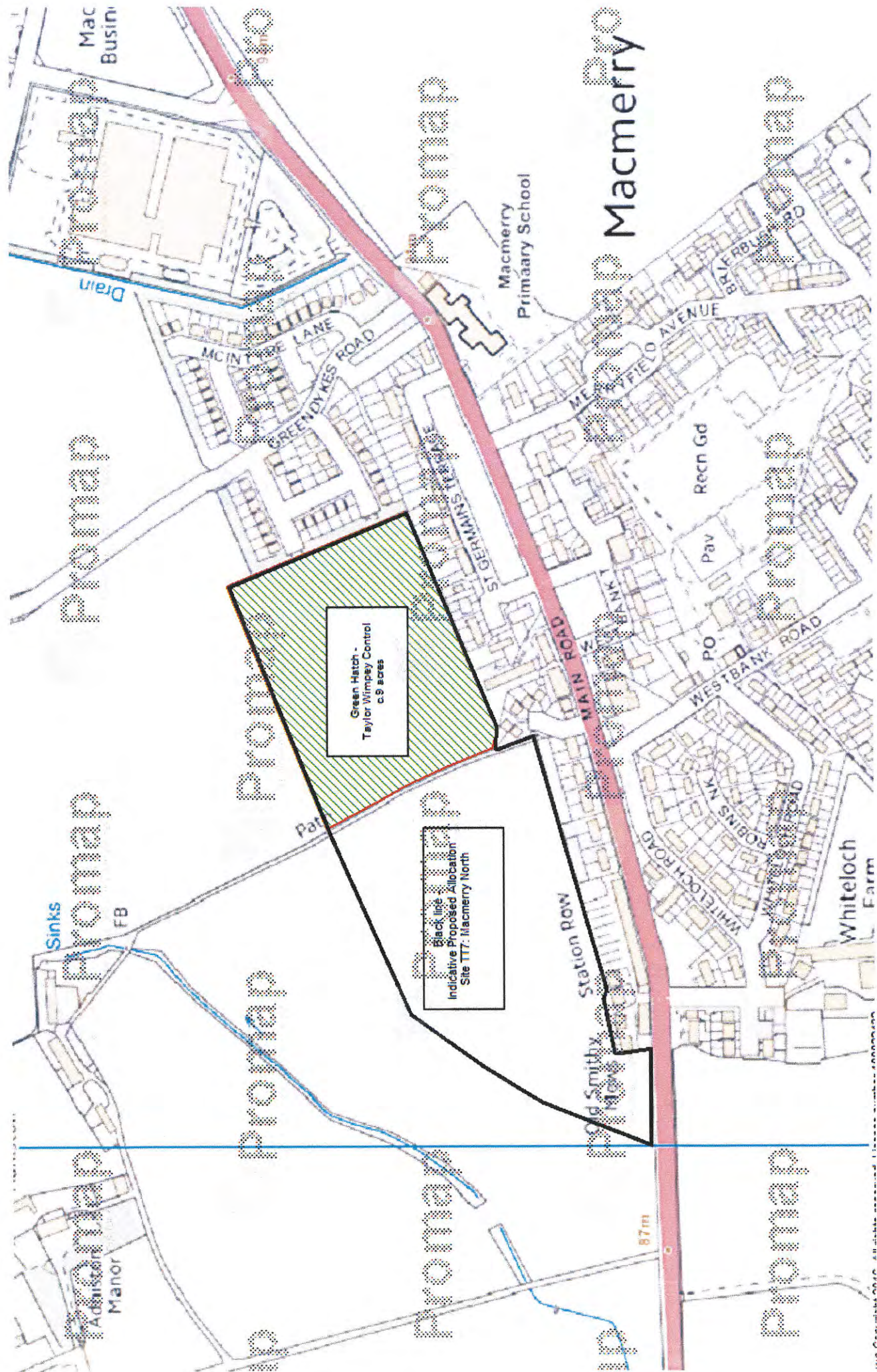
Justification for Modification(s) :

Visual Upload:

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Visual Upload:

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Green Hatch -
Taylor Wimpey Control
c.9 acres

Black site -
Indicative Proposed Allocation
Site T17, Macmerry North

87m

Mac Busin

Macmerry
Primary School

White Loch
Farm

Sinks

FB

Manor
Administration

St. Germain's
New

Station Road

Main Road

Recn Gd

Pav

PO

Robins

White Loch

Westbank

Field

Drain

McIntyre Lane

Green Dykes Road

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From:
To: [Local Development Plan](#)
Subject: Proposal for development at Windygoul South, Tranent (PROP TT1)
Date: 07 November 2016 12:04:10

Dear Sir/ Madam,

Further to your notification of a proposal for development at the Windygoul South, Tranent.

I hereby wish to raise my objections to the proposal on the following grounds....

I was advised by the builders on purchasing my property in 2009 that no further developments adjoining my property would take place for approx 18 years.

The existing infrastructure in terms of the road network and access is not sufficient and will greatly increase the volume of traffic coming in and out of Tranent.

The increase of traffic to the existing estate and potential safety issues if this increased traffic has access past the primary school.

The increase in emissions caused by the increase in cars. As you will be aware most families have a least one car per household , if not more.

I understand the emissions in Tranent High street are already at a high level. What measures are the council taking to deal with emissions ?

The development also increases the demand for both primary and secondary school places. The primary school recently underwent an expansion which caused inconvenience to existing residents along with increased noise levels and mess.

The GP practices in the area are already at capacity and with the a National shortage of GP's how does the proposal deal with potentially new residents not being able to be registered with a GP practice.

By building on existing agricultural land which is prime land and is needed as part of the food chain this development increases cost of food.

Lastly, the impact on the wildlife needs to be considered and the green spaces for existing residents is also lost.

I would be grateful if you would reply to this email to confirm receipt of my objections.

Regards
Adrian Kidd

TaylorWimpey

**Proposed East Lothian Local
Development Plan - Eweford Farm,
Dunbar**

Date 7 November 2016

HolderPlanning

5 South Charlotte Street, Edinburgh, EH2 4AN.

Tel: 0131 225 6349

www.holderplanning.co.uk

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Appendix 1: Context Plan

Appendix 2: Indicative Development Framework

1. Eweford Farm, Dunbar

- 1.1 This representation is submitted on behalf of Taylor Wimpey in support of an allocation of a site in Dunbar, known as Eweford, for a residential led, mixed use development. The site is shown on the attached Context Plan.
- 1.2 Development of the site presents the opportunity to connect the new neighbourhoods and, importantly, the existing neighbourhoods at Hallhill with the nationally significant natural resources of Belhaven Bay and the John Muir Way. The landscape strategy of the indicative development framework has been devised to integrate Dunbar, West Barns and Eweford in a positive way that allows access for all to these natural resources.
- 1.3 The Eweford Farm site is currently not proposed to be allocated in the LDP, although it is referred to in paragraph 2.132, as follows:

“In to the longer term, land at Eweford Farm may be considered suitable as a mixed use expansion area. Matters to be resolved include the means of access to the site, in particular how this might be provided without adding additional vehicle journeys to Spott Road. Additional connections may be considered to Thistly Cross roundabout. A second vehicle access may need to be provided over the East Coast Main Line where it is in cutting. This would provide a vehicular access into Dunbar from the A1 Expressway over the East Coast Main Line to connect with Edinburgh Road. In terms of education provision, solutions would need to be found, and these may offer scope for such a new road alignment. Dunbar Grammar would also require to be expanded. To allow for this the relocation of sports pitches south of the rail line to the Dunbar Healthy Living Centre or adjacent to Dunbar Primary School is likely.”

- 1.4 The design of the new neighbourhood for Eweford Farm has been based upon the qualities of successful places set out within Creating Places (a policy statement on architecture and place in Scotland) and the attached development framework identifies how some of these objectives can be achieved.
- 1.5 The six qualities of successful places are set out as:
 - distinctive
 - safe and pleasant
 - easy to move around
 - welcoming
 - adaptable
 - resource efficient

Distinctive

- 1.6 The layout has been developed to fit within the existing landscape structure and the existing and emerging built environment. It will contain spaces and elements which are unique to this area such as provision of open space around scheduled monuments and will be designed to maximise the views north towards the Forth and south towards the rolling countryside of East Lothian.

Safe and Pleasant

- 1.7 The new neighbourhood will be designed so that streets and open space are overlooked by housing. This will increase natural surveillance and the sense of safety and security.

Easy to move around

- 1.8 The design of the streets will prioritise pedestrians and cyclists and maximise connections through the development. This will also help to integrate the new neighbourhood with the surrounding residential areas. The retention of key routes such as School Brae will help to integrate the new houses.

Welcoming

- 1.9 The design proposes a series of gateways which will provide access to the new neighbourhood. These will be focal points and formed by buildings or spaces which provide a positive experience on arrival within the new area.

Adaptable

- 1.10 The masterplan will provide a framework for future development which should be flexible to accommodate the changing requirements of people and housing moving forward.

Resource Efficient

- 1.11 The houses within the new neighbourhood will be designed to the latest technical standards and be capable of incorporating emerging sustainable technologies relating to carbon reduction.

Site Assessment

- 1.12 The LDP's Environmental Report Appendix 9 assesses the site and reaches generally positive conclusions as follows:

Location

- 1.13 The site is within open countryside however it lies adjacent (but separated by the East Coast railway line, with access along a single carriageway road under the railway track) to the existing settlement of West Barns and is also in close proximity to Dunbar. It also lies directly to the west of land which is currently allocated for housing in the current Local Plan and would therefore relate to an existing settlement once the allocated housing has been developed.

Accessibility

1.14 Dunbar's overall accessibility via public transport to the wider city region and key employment locations as well as health and retail facilities ranks sixth among other settlements in East Lothian. The site is not within 400m of a bus service or 800m of a rail station, however given the scale of the proposed development it would be assumed that a bus route would be provided through the development, similarly to the adjacent housing development at Hallhill. West Barns is within 800m and provides a limited selection of local facilities, a full range of facilities and services are provided in Dunbar and the town centre is under 3km away.

Suitability for Proposed Use

1.15 The site would generally be suitable for housing and would not arise in land use conflicts with surrounding uses. The site is bordered by the East Coast railway line to the north and A1 to the south, which could result in potential and noise impacts dependent upon siting and design. Mitigation measures may be required.

Fit with Strategic Policy Objectives

1.16 The site is adjacent to a main settlement within the East Lothian SDA as identified within SESplan. Its development would therefore align well with strategic policy objectives of steering new development towards the most sustainable locations within the city region.

Physical Infrastructure Capacity

1.17 The site submission indicates that the site has electricity, gas, water and sewage connections. The site would be served by Castle Moffat WTW and Dunbar WWTW. Castle Moffat WTW has available capacity and Dunbar WTW has very limited capacity. Significant investment to provide suitable access to the site from the A1 at the Thistly Cross roundabout would be needed. A secondary vehicular access would be required to cross the East Coast railway to link North and South Dunbar, as Spott Road does not have the capacity to accommodate flows from this scale of additional housing development.

Service Infrastructure Capacity

1.18 The site is within the catchment of West Barns Primary School which has no capacity, but potential for further very limited expansion on the site may be possible dependent on the timing of implementation of existing planning permissions. At secondary level the site would be served by Dunbar Grammar School, which has no capacity but there may be potential for further limited expansion on the site. A development on the scale proposed would require a new primary school.

Biodiversity

1.19 The site is not within any sites designated for international, national or local nature conservation interests, however it is within 1km of the Forth of Forth SPA, and the cumulative impact on the SPA of the development of this site in conjunction with other sites would need to be assessed. SNH has advised that there are records of SPA birds using the area, there is suitable habitat on the site, and there is potential connectivity to the SPA, therefore the site

should be screened in for consideration through the Habitats Regulations Appraisal (HRA) process at this stage. There are some small areas of priority habitat within the site including semi improved acid grassland and a section of species rich defunct hedge and species rich intact hedge.

Population

- 1.20 The site would provide housing, including an element of affordable housing to help meet need. The site currently has limited access to facilities and services by public and active transport. Depending on the size of the development, the site submission states that it could also provide a community hall and convenience retail provision, which would benefit residents of the site and potentially other existing residents nearby.

Human Health

- 1.21 The site is not known to be contaminated. Its development could provide opportunities for linkages with the core path network which passes through the site to encourage healthy travel. Open space could be provided as part of the development to serve the local population.

Soil

- 1.22 The development of the site would result in the loss of a large area of class 2 and 3.1 prime agricultural land. It would not result in the loss of rare or carbon rich soils.

Water

- 1.23 The site is within Potentially Vulnerable Area 10/25. A small part of the north eastern area of the site is shown on SEPA's flood map to be at risk of flooding from the watercourse which flows through the site and a FRA would be required to assess the flood risk from this watercourse. SEPA's flood risk map also identifies areas of the site as being at risk of surface water flooding. The development of the site could potentially increase flood risk downstream where there have been historic flood events. SEPA's comments highlighted opportunities to open up more of Eweford Burn which is heavily modified and culverted.

Air

- 1.24 The site is bounded by the A1 and East Coast Mainline which could result in air and noise pollution depending upon detailed siting and design. The site could be provided with good access to local facilities and services, and good active and public transport accessibility to minimise travel by car. However, given the proximity to the A1 it is inevitable that the development of housing on this site would result in an increase in travel by private car and resultant emissions.

Cultural Heritage

- 1.25 There are a number of category C listed cottages (Eweford Cottages) within the site boundary and two scheduled monuments (Thistly Cross enclosure and ring ditches and Eweford Cottages enclosure and ring ditches). The development of the site would impact on the sites and settings of the two scheduled monuments within the site boundary, and dependent upon an

appropriate design strategy these impacts could be mitigated to an extent. Significant archaeological remains were uncovered during the A1 upgrade work and there are significant cropmark remains in area, and human burials have also been uncovered within the site boundary. There is a very high potential for unknown archaeological remains. ELCAS would normally recommend no development in this area however, if it is progressed early consultation with ELCAS would be required along with pre-determination evaluation.

Landscape

- 1.26 Within the site there are natural stone walls, some defunct species poor hedgerows and groups of mid aged to mature trees largely interspersed in the grassy verge along or adjacent to the access road (running parallel to A1) to the south, but in general the landscape is largely open in character with 360 degree panoramic views of the surrounding landscapes including John Muir Country Park, Bass Rock, Traprain Law and the Lammermuir Hills. Due to the relative
- 1.27 flatness of the site and the lack of any natural boundaries the site will be highly visible from the busy A1 and from the East Coast Railway line. If noise mitigation measures are required, they may also have an impact on the landscape and/or views from the A1 and/or East Coast Main Line. West Barns is located mid way along the northern boundary of the East Coast Railway line and Dunbar sits to the north and east of the site boundaries. Any expansion of housing on this site would raise issues with coalescence between the two areas.

Housing Land Supply

- 1.28 We refer the Council to the submission made by Homes for Scotland to the Proposed LDP, which raises concerns that the assumed programming for newly allocated sites maybe optimistic, and that a further assessment of the supply will be required to establish if the LDP allocates sufficient housing to meet SESplan requirements.

Proposed LDP Modification

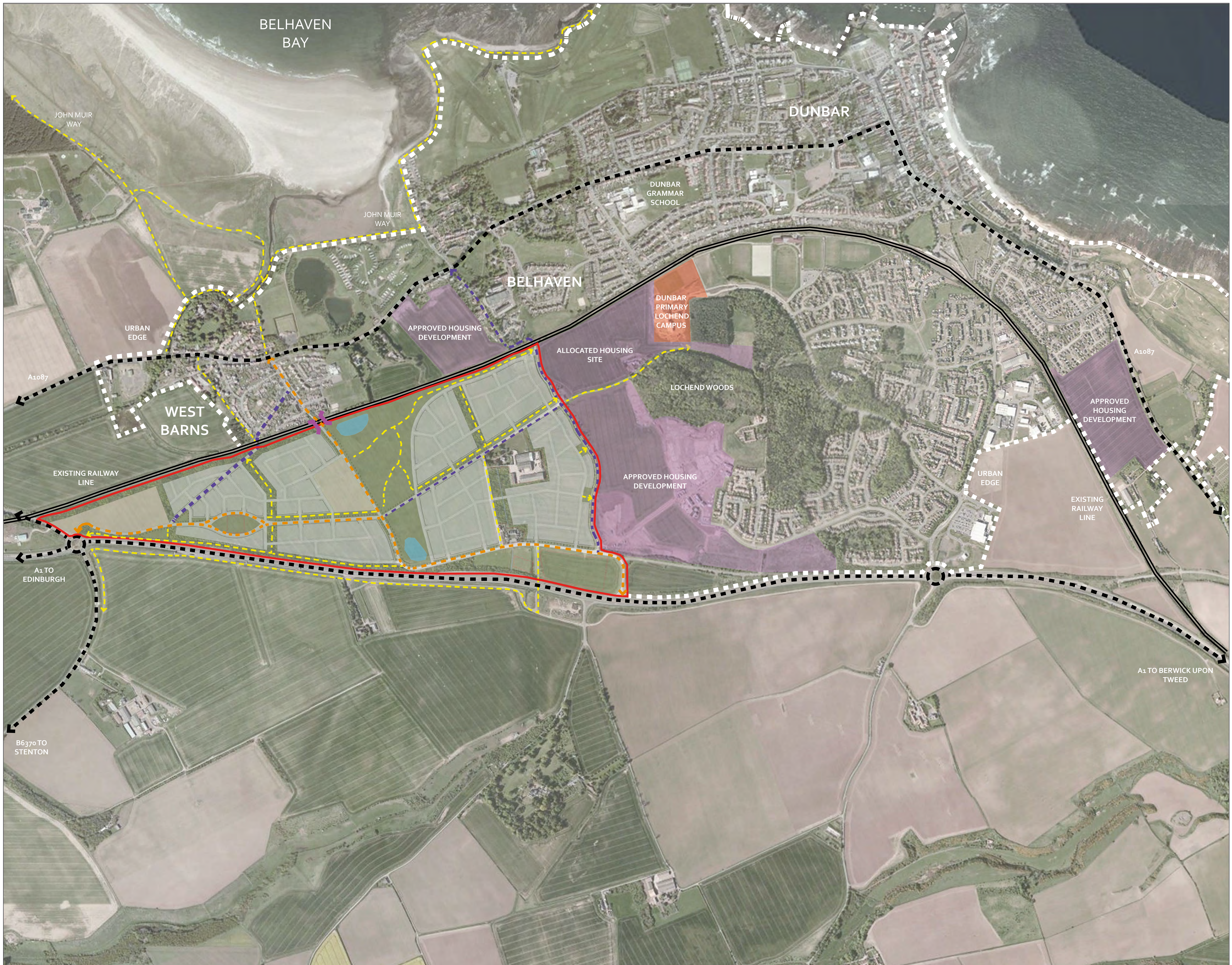
Dunbar Cluster

- 1.29 Allocate the Eweford land for residential led mixed use development through inclusion of a new proposal and identification of the site on the Proposals Map.
- 1.30 However, if East Lothian Council and/or the Examination reporter do not consider this to be necessary, then we propose that the site is safeguarded for development.
- 1.31 This latter would simply reflect the terms of LDP paragraph 2.132, which states that the site may be considered suitable in the longer term as a mixed used expansion area. To identify the site as a specific safeguard in the text and to delineate that safeguard on the Proposals Map would provide greater clarity on the position, and make it clear what area of land is being referred to in the text.

2. Proposed LDP Modification

Dunbar Cluster

- 1.29 Allocate the Eweford land for residential led mixed use development through inclusion of a new proposal and identification of the site on the Proposals Map.
- 1.30 However, if East Lothian Council and/or the Examination reporter do not consider this to be necessary, then we propose that the site is safeguarded for development.
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TAYLOR WIMPY
EWEFORD FARM
DUNBAR, EAST LOTHIAN

CONTEXT PLAN

DATE	NO.	DESCRIPTION
16/11/2020	001	ISSUE FOR PERMIT

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- SITE BOUNDARY
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- PROPOSED PRIMARY ROUTES
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- PROPOSED PEDESTRIAN / CYCLE NETWORK
- PROPOSED RESIDENTIAL
- PROPOSED COMMERCIAL
- PROPOSED COMMUNITY HUB / SCHOOL
- OPEN SPACE
- WOODLAND
- TREE LINED AVENUE
- OPPORTUNITY TO OPEN UP BURN
- POTENTIAL FOR NEW BRIDGE
- PRIMARY FRONTAGE



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FRAMEWORK DRAWING

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