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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.

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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,
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Proposed East Lothian LDP Submission

Hargreaves Services Ltd

November 2016

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Claire Semple
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Client
Hargreaves UK Services Limited

Our reference
HARE2001

6 Nov 2016

Executive Summary

1. This report summarises those representations made on behalf of Hargreaves Surface Mining Ltd (Hargreaves) in respect of the East Lothian Proposed Local Development Plan (PLDP)
2. Hargreaves acquired major land holdings in the East Lothian area and across Scotland through the acquisition of assets formerly owned by Scottish Coal. Hargreaves' landholding includes land which has been allocated for a new settlement at Blindwells in the adopted local plan since 2008 and they own or are in control of additional land to the east of this land.
3. The PLDP seeks the views of stakeholders in respect of planning policy within the East Lothian area.
4. The proposed safeguarding of Greater Blindwells to form a larger new settlement is one such development option. Our clients support this wider allocation to create a greater Blindwells settlement, creating a significant and comprehensive solution to the housing land supply within East Lothian for the foreseeable future.
5. Our clients land can be developed as the second phase of a Greater Blindwells or as a standalone extension to the current Local Plan allocation.

1. East Lothian: The Place

- 1.1 Hargreaves' is supportive of the overarching policy aims and objectives contained within this section of the plan.
- 1.2 It is acknowledged that in order to due to the increase in population and a change in the composition of households that there is a requirement for more households to be created and for these households to cater for a wider variety of occupants.
- 1.3 The projected growth in East Lothian's population growth can be partially accommodated through the delivery of additional housing land at Blindwells.
- 1.4 Our clients believe that the delivery of additional housing at Greater Blindwells will facilitate economic benefits across East Lothian and beyond.
- 1.5 Our client is concerned about any new station at Blindwells forming planning policy within the PLDP. This should be delivered through supplementary planning guidance once the viability has been fully assessed.

2. A Spatial Strategy for East Lothian

- 2.1 Our client acknowledges the support given to Blindwells' existing allocation and also the safeguard which has been put in place for Greater Blindwells. Our client considers that there are significant benefits to directing additional growth at this location.
- 2.2 Our client is willing to work with all of those landowners who own land within the Greater Blindwells area, however, our client would also like to point out that the development of additional land to Blindwells could be developed as an extension to the additional allocation if necessary and appropriate.

PROP BW1: BLINDWELLS NEW SETTLEMENT

- 2.3 Our client supports the wording of PROP BW1: Blindwells New Settlement. Also, given that the site has been allocated since 2008, our client also supports the position that development which could jeopardise the delivery of this site should not be supported.
- 2.4 There is currently a live planning application which has been submitted in respect of the allocated site. The application is supported by a suite of technical and environmental information which demonstrates that the site can be developed without any detrimental impacts upon the local environment or population. The planning application addresses those matters outlined in PROP BW1.

PROP BW2: SAFEGUARDED BLINDWELLS EXPANSION AREA

- 2.5 Our client supports the intention of PROP BW2 and the safeguard for an expanded development area. Given the knowledge that our clients and their technical team have of the site, we would anticipate that any Design Framework would be prepared in conjunction with our clients and any other landowners.
- 2.6 Given that there are several landowners involved within the site, submission of a single application and conclusion of a single legal agreement will be complicated. If there is an overarching Design Framework which all landowners have had an input to, this would negate the need for a single application.

POLICY BW3: BLINDWELLS AREA DESIGN FRAMEWORK

- 2.7 Our client supports the development of a design framework for the safeguarded area subject to the involvement of all landowning parties to this document.

3. GROWING OUR ECONOMY AND COMMUNITIES

POLICY HOU 1: ESTABLISHED HOUSING LAND SUPPLY

- 3.1 Our client supports Policy HOU 1 in relation to established housing land supply. Our client requests that there is reference made to the potential housing demand that additional land at Blindwells could accommodate and circumstances where this site may come forward to satiate such demand.

POLICY HOU 2: MAINTAINING AN EFFECTIVE HOUSING LAND SUPPLY

- 3.2 Our client supports the maintenance of an effective housing land supply, furthermore the effective supply should exceed housing land targets in the event that sites are delayed or not delivered.

POLICY HOU3: AFFORDABLE HOUSING QUOTA

- 3.3 Our client supports the approach to affordable housing, 25% is a fair and consistent approach across the whole of East Lothian. On circumstances where there is no required demand, there should be cognisance of this within the policy. It is requested that the figure of 25% is applied to the Greater Blindwells area.

PROP ED3: BLINDWELLS CLUSTER EDUCATION PROPOSALS

- 3.4 Our client supports the approach to the delivery of education as set out on this proposal.

4. Developer Contributions

- 4.1 Our client supports the approach taken to developer contributions. Given the size and scale of developer contributions likely to be made by our clients through delivery of their land, it would be helpful to see which cost matrices are used to calculate contributions required by East Lothian Council.

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07 November 2016

East Lothian LDP Proposed Plan

East Fortune Hospital Site

Representation on behalf of Centuff Limited

1. Centuff Limited is pursuing proposals for the former East Fortune Hospital site, including the retention and refurbishment of the listed buildings and associated development. A Proposal of Application Notice was submitted in May 2016, and consultation events were held in June and July.
2. The site of the former East Fortune is allocated in the adopted Local Plan 2008 under Policy ENV12: Former East Fortune Hospital. The policy states:

“The Council supports the use of the former East Fortune Hospital for employment, leisure or tourism uses. All proposals should safeguard and secure the long-term maintenance of the Listed Buildings and their setting. A housing use will only be acceptable as enabling development to secure this and is further conditional upon:

- 1. satisfactory provision for the retention and long-term maintenance of the 7 Listed Buildings; and*
- 2. any housing being limited in number and size of units to that agreed with the Council on the basis of what is judged the minimum necessary by independent assessment to secure (1) above; and*
- 3. availability of infrastructure, including education capacity”*

3. The site of the former East Fortune Hospital has been vacant since the hospital closed in 1997, and is no longer needed by NHS Lothian. The site contains seven listed buildings which were part of its original use as a First World War airship station. The Council’s objective in the adopted Local Plan is to secure the long term maintenance of the listed buildings and their setting and to provide for an appropriate use for this brownfield site.
4. In the absence of any firm proposals for employment, leisure or tourism uses at the site, the Council accepted, in allocating the site in the adopted Local Plan, that the principle of residential use as enabling development was a reasonable prospect of funding the long-term future of the listed buildings. The scale of any new housing was, however, to be agreed. Since this allocation, economic and viability issues in relation to the future of listed buildings have become more prominent in planning policy, in both Scottish Planning Policy (SPP) 2014 and in the HES Policy Statement (June 2016).
5. The LDP Proposed Plan makes no equivalent allocation in relation to the East Fortune Hospital site, and the future of the listed buildings may be threatened as a result. The current Local Plan policy includes sufficient flexibility to allow consideration of an ‘enabling’ development, subject to appropriate independent verification. The LDP should include an equivalent policy in relation to East Fortune Hospital.
6. Centuff Limited considers that the equivalent of Policy ENV12 should be added either to the North Berwick Cluster as a Mixed Use Proposal for the hospital site, or as a new Inset Map, similar to Inset Map 10 for



Drem, with cross-referencing in the LDP to relevant policies. Centuff would recommend inclusion of a proposal for the East Fortune Hospital site, and as part of the North Berwick Cluster map.

Change Sought

7. Centuff Limited seeks the inclusion of a policy/proposal in the LDP equivalent to Policy ENV12 of the adopted Local Plan 2008, in relation to East Fortune Hospital. Centuff considers that the most appropriate location for this would be a Proposal within the North Berwick Cluster section of the LDP, or an alternative location considered appropriate by East Lothian Council/Reporters.

East Lothian Developments Ltd

East Lothian Local Development Plan – Representation in respect of PROP M13 – Land at Howe Mire

Date: 7 November 2016

HolderPlanning

5 South Charlotte Street, Edinburgh, EH2 4AN.

Tel: 0131 225 6349

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1. Representation on Howe Mire

- 1.1 This representation is submitted on behalf of East Lothian Developments Limited (ELDL), and comprises an objection to PROP M13 – Land at Howe Mire. The Proposed LDP contains the following commentary on the site:

“2.38 Land at Howe Mire is allocated for circa 170 homes and could also provide land for employment uses. The Howe Mire site is located within the core of the designated Pinkie Battle site, adjacent to the existing urban boundary. The previous planning appeal decision in relation to land at Barbachlaw has allowed some encroachment of development beyond the existing urban boundary, on to greenfield land within the core of the battle site. Particular considerations for the Howe Mire site will be a need to demonstrate that the land can be developed in line with Policy CH5. A suitable site access solution for this site will also be required that complements and does not undermine proposals for access for PROP MH9.

2.39 In line with PROP ED1, primary education capacity for site MH13 shall be provided at the new Wallyford Primary School once delivered: it may be that to ensure additional primary education capacity can be provided for development of site MH13, current proposals for land around the proposed primary school campus within site MH9 may need to be modified to provide additional campus land; alternatively, development of site MH13 will be delayed unless and until capacity becomes available at the new Wallyford Primary School. Prior to the commencement of housing development at the Howe Mire site the Council expects the new link road and primary school at the original Wallyford allocation to be ready for use.

- 1.2 *2.40 Careful consideration of landscape impact and mitigation, including any required to mitigate noise, will be required. An assessment of any land remediation works on the water environment will be required. A Flood Risk Assessment will be necessary. Significant landscape planting will be necessary to define new defensible green belt boundaries around the site and to contribute towards green network objectives.”*

- 1.3 This commentary serves to highlight the difficulties with the site. To deal with the points raised above:

- 1.4 Firstly, the site is located at the core of the Pinkie Battlefield Inventory Site. This site is of national importance, and development here would be likely to have a significant harmful impact both in terms of impacting directly upon archaeological remains associated with the battle and the landscape characteristic of the battlefield. This is in direct contradiction to LDP Policy CH5, which states:

Policy CH5: Battlefields

- 1.5 *Development within a site listed in the Inventory of Historic Battlefields will not be permitted where it would have a significant adverse affect on the key features of the battlefield, including its key landscape characteristics and special qualities, unless it can be demonstrated that the overall integrity and character of the battlefield area will not be compromised. Any new development supported in such areas must provide appropriate mitigation that conserves or*

enhances the key features of the battlefield, including through siting, scale, design and landscape treatment and, where relevant, contributes to the understanding of the battle and historic assets, particularly with respect to any archaeological deposits found in situ (See Policy CH4).

1.6 The LDP Environmental Report Appendix 5 (Musselburgh Assessments) reaches the following conclusions for the site in respect to cultural heritage:

1.7 *“The site is in the core area of the designated Pinkie battlefield and contributes strongly towards understanding of the battlefield landscape. Historic Scotland considers its development would raise issues of national importance. Previous archaeological evaluations have identified remains within the area and there is considered to be a very high potential for unknown archaeological remains.”*

1.8 Given these issues, therefore, and how central the Howe Mire site is to the Battlefield area, it is difficult to see how compliance with Policy CH5 is possible.

1.9 Secondly, we are not aware that there is any education capacity for the site in the new Wallyford Primary School, which we understand has been designed to accommodate the Wallyford housing proposal, but not including the Howe Mire site.

1.10 Thirdly, it is notable the text of the LDP refers to the careful consideration of landscape impact in mitigation. However, in our view, there will be a significant harmful impact on the Green Belt landscape through development of the site, and this view is supported by the LDP’s Environmental Report which reaches the following conclusions on landscape:

“The northern half of the site (north of Victory Lane) includes a field to the east currently allocated for business use but with housing recently allowed on appeal while to the west lies a partly constructed greyhound stadium. 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. It would not in itself cause settlement coalescence. If noise mitigation measures are required, they may have an impact upon the landscape and/or surrounding views from the A1 and/or East Coast main Line.”

1.11 Fourthly, we are not aware that the traffic impacts of site development have been fully tested. The LDP’s Environmental Report reaches the following conclusion:

“Access onto Salter’s Road is achievable, however here are traffic capacity constraints within the Musselburgh area and further consideration is required to establish how these might be mitigated.”

1.12 We do not consider that the Howe Mire allocation takes proper account of the other Wallyford proposal, which comprise 2,000 homes, a secondary school and a primary school using the

proposed new distributor road. The Howe Mire proposal would involve a junction onto Salters Road within 50 metres of this major junction, which in our view is not appropriate

1.13 For all of the above reasons, ELDL **object** to the allocation of Howe Mire for mixed-use development.

1.14 **Proposed Modification:** Delete the allocation at Howe Mire for mixed use development

7th November 2016

Local Development Plan Team
East Lothian Council
John Muir House
HADDINGTON

Dear Sirs,

I write to object to the inclusion of the sites in Humbie and East Saltoun as proposed sites for housing development.

The Council's initial assessment of both sites clearly showed that they did not meet the criteria for being suitable for residential development and throughout the "consultation" process East Lothian Council has consistently failed to respond to the concerns expressed at community meetings and has failed to provide any meaningful justification to show why these potential developments of 75 (East Saltoun) and 20 houses (Humbie) are required or can be successfully integrated within the existing communities.

With regard to the Humbie site it has been made clear that one of the landowners has not taken any decision on whether their land will be available for development. The Plan and draft development brief suggest that the site will accommodate a maximum of 20 houses. The Council's Planning Officer advises if only part of the site is made available for development it could still accommodate 20 houses. A reduction in the development area available should lead to a reduction in the maximum number of houses to be built. In the circumstances, I consider the suggested limit of 20 houses has no validity and, if the site, is zoned for housing development it is possible that a much larger number of houses will be proposed which could not be adequately integrated with the existing community.

Serious reservations have also been made with regard to Humbie that the access to/from the site during development and once the site is developed is wholly inadequate to provide safe passage for the likely number of residents' vehicles.

East Lothian Council has failed to make a case to justify the development of either of these sites nor has it been detailed how the additional housing will be integrated to either community and its services (drainage, transport, schools etc.)

Alastair Beck

In the circumstances with too many unanswered questions, I object to the inclusion of either site in the LDP.

Yours faithfully,

Alastair Beck

HOMES FOR SCOTLAND REPRESENTATION
East Lothian Proposed Plan

ABOUT YOU

1. **What is your name?**

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5. **Are you responding on behalf of:** *Other

6. **What is your organisation and role?**

Organisation: Homes for Scotland

Role: Principal Planning Advisor

HOMES FOR SCOTLAND REPRESENTATION
East Lothian Proposed Plan
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:

Homes for Scotland suggests amendment of Para 3.34 which currently suggests that rate of delivery of housing is dependent on factors not related to the SDP requirements, or the LDP or its Action Programme to ensure that the LDP and its Action Programme is less passive in the process of delivery, and far more proactive and focussed on delivery of homes through the allocation of sites that meet the criteria listed in the paragraph.

Amend Table HOU1 and Appendix 2 of Technical Note 1 to take account of more realistic programming of Blindwells BW1, acknowledging constraints to delivery in later years of the plan of this first phase of development.

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):

While we agree that there are many factors influencing the delivery of housing, we do not consider that these factors are unrelated to the LDP or its Action Programme as stated in Para 3.34. It is a matter for the spatial strategy to allocate land for housing development in places where people want to live; sites that are marketable and deliverable, and where there is more likely to be sufficient flexibility to fund any necessary infrastructure interventions.

Homes for Scotland is concerned that the allocation BW1 has over ambitious programming. We do not believe that this site is deliverable in full, and certainly not at the rate programmed within the Plan. We appreciate that the Blindwells expansion BW2 is not programmed to deliver in the plan period, and is instead 'safeguarded', however we suggest that there are issues with delivering the whole of the first allocation as well as the expansion site, and suggest that not all of the 1,600 units in allocation BW1 can be counted as contributing to the effective land supply for the LDP period, together with the entirety of BW2 unless comprehensive solutions to addressing infrastructure constraints can be found. The Council acknowledges in Para 3.36 that a "comprehensive solution that may allow Blindwells to expand" has not yet been found. We consider that much of the initial BW1 phase of Blindwells delivery is also constrained by the same lack of solution to support delivery.

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:

Para 3.42 should be more strongly worded to reflect the onus on the planning authority to determine applications as quickly and efficiently as possible to deliver the ambitious programme set out by the authority in the LDP.

Policy HOU2: Maintaining a 5-year Effective Housing Land Supply part 5 should be amended to ensure that it is consistent with SESplan1 Policy 7 part c.

Programming set out for the early years of the Local Development Plan should be amended and pushed back to start delivery of allocated sites in 2018/19 to be more realistic, reflecting current and recent past delivery rates, and reasonable programmed completions.

Amend Table HOU2 to take into account a generosity allowance and allocations for 10 years from plan adoption – setting out completions up to 2028 clearly within the table.

Amend Paras 3.46 – 3.48 to include marketability as a factor in calculating the five year effective housing land supply. Delete “and this is not due to ‘marketing constraints’” from Para 3.48. Amend Para 3.47 which is currently contradictory – development plan policies about the supply of housing land are considered out of date where a shortfall emerges in the five year effective supply, and the presumption in favour of development which contributes to sustainable development is the significant material consideration, not the Plan strategy.

Delete reference to “or any housing monitoring paper” within point 4 of Advice Box 1.

Amend Policy HOU1 to refer to the most up to date Housing Land Audit.

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):

This section of the Proposed Plan acknowledges the potential difficulty in delivering the programmed completions set. Para 3.41 states “*building new homes at the rates and in the volumes expected by the SDP will be extremely challenging, including for housing providers. Even though a generous housing land supply has been made available by the plan at the point of adoption, an inability to build homes on the land supply at the rate expected to meet SDP requirements when the plan is operative could lead to calls to release additional sites for alternative housing proposals on land not identified as suitable in principle for that purpose by the plan, and thus a very serious and unjustified threat to the delivery of the plan’s strategy and sites*”

Homes for Scotland recommends that part 5 of Policy HOU2 is amended to be compliant with SESpln1 Policy 7 part c. Part 6 of Policy HOU2 reiterates the SESplan policy 'test' for infrastructure, however part 5 does not wholly correspond with this statement, and is convoluted in its language. The existing Interim Planning Guidance (2014) already clearly sets out the assessment of the 5-year effective housing land supply. We support this method of assessment and suggest that this could also be used within the LDP to add clarity.

Homes for Scotland is concerned that the programming set out within Appendix 2 of Technical Note 2 on Planning for Housing may be overly optimistic in the early years of delivery. There is an assumption within the programming that all allocations will deliver homes from 2017/18 onwards. This would require planning permission for all of these sites to be granted this year. We consider this to be impossible as not all of the sites have been subject to the submission of a planning application. Additionally, some sites are in locations which have unresolved infrastructure challenges, and while the Developer Contributions Framework draft supplementary guidance goes some way to identifying solutions to some of these challenges, there may still be discussions and decisions made in order for these sites to come forward, and resulting delays to delivery at the rate programmed. Lastly, not all of the sites have a home builder attached to them, and some sites are very ambitiously programmed in terms of annual yields. There is therefore a risk in the programming in the early years of the LDP that the situation set out within Para 3.41 above does in fact happen. Homes for Scotland is supportive of the step-change in targets set by East Lothian Council in this plan, and the focus on delivery of homes, however the programming set is a concern and we are doubtful of the ability to deliver homes at the pace anticipated.

We suggest that programming should be pushed back for allocated sites to 2018/19 to be more deliverable. We consider this to be a more realistically achievable approach to the programming, although we acknowledge that this will lead to a shortfall in effective housing land supply for the early years of the plan period, meaning that it will not have a continuous five year effective land supply at all times from the point of the Plan's adoption which would be contrary to Scottish Planning Policy and be a concern to the home building industry.

We acknowledge that delivery of ambitious targets will be challenging and so the home building industry must be supported to deliver the Proposed Plan's spatial strategy. As set out within Para 3.43, delivering the SDP requirements "*assumes that annual completion rates of more than double the highest level delivered in East Lothian can be achieved (in some years more than quadruple the annual average since 2001/02), and that such a rate and volume of delivery can be sustained throughout the plan period*". This is an ambitious plan that will require a significant step change in collaborative working to deliver. The Housing Land Supply Interim Planning Guidance (2014 and 2016) encourages early submission of applications, and this is supported by the home building industry, however the early determination of these applications within the statutory timescales and engagement on developer contributions as early as possible in the application process must be implemented for every application. The 2016 Interim Guidance attempted to give more weight to Proposed Plan allocations, and this is supported by Homes for Scotland. Through setting this ambitious programming, the onus is on the planning authority to actively manage applications as they are submitted, and determine these as soon as possible to support delivery of homes.

Homes for Scotland would like to see programming set with the input from the industry (Homes for Scotland and home builders). We would be happy to engage with the planning authority on the Homes for Scotland procedures for Housing Land Audits which includes detail on effectiveness, average completion rates and programming.

It should be noted that very large allocations such as Musselburgh and Blindwells, even with full council and developer support will be inherently slow to deliver by their nature, until the sites are established and multiple developers present. Although the allocation of ambitious sites should be applauded, where the potential for proper supporting infrastructure cannot be planned and delivered, it increases the risk of a shortfall in supply. While Policy HOU2 provides for land to be brought forward for housing development if an adequate five year effective housing land supply is not being maintained, this site must be useable to bring forward sites if those identified within the Plan are not coming forward at the rate anticipated in the projected programming.

Paragraph 116 of Scottish Planning Policy (SPP, 2014) states that the overall housing supply target should be increased by a margin of 10-20% to establish the housing land requirement to ensure that a generous supply of land for housing is provided. It can reasonably be presumed that the terminology of housing requirement set out within SESplan in accordance with the earlier 2010 SPP can be equated to the housing supply target now referred to within the current SPP. While SPP in Para 118 expects the Strategic Development Plan to set both the housing supply target and the housing land requirement with generosity figure built in for each local authority area, in the case of SESplan1 this has not been done since the SDP was approved prior to the publication of the most recent SPP. Therefore it is reasonable to expect the LDP to set the generosity margin on top of the SDP Housing Requirement to ensure that a generous supply of land for housing is provided. We suggest that Table HOU2 should be updated to show the generosity margin, as we note that East Lothian Council has not explicitly added generosity to the SDP Housing Requirement. However, in the case of this SDP, we acknowledge that an element of generosity has certainly been added, although not clearly stated within the Plan. We maintain that a generosity margin should be stated clearly within this table, to add transparency, although we note that at the programming set by the Plan, there is no shortfall in housing land supply. This is dependent on the programming being delivered, and as set out above, we believe amendments are required to the programming to be more realistic to ensure delivery of the numbers identified over the lifetime of the LDP.

Para 119 of Scottish Planning Policy states that LDPs should “allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption”. The East Lothian LDP is expected to be adopted in 2018, and therefore the Plan should allocate land up to 2028. The Proposed Plan, however, does not explicitly set out allocations for the period of 2024-28. Table HOU2 should therefore be amended to be clearer for that period, rather than giving a figure for 2024-32 and beyond 2032 to be compliant with SPP. It is possible to work out these figures from programming within Appendix 2 of Technical Note 1 on Planning for Housing (and we mention again here our concern that this programming must be realistic).

Paragraphs 3.46-3.48 are of concern to Homes for Scotland as they appear to be seeking to remove marketability as a factor when calculating the five year effective housing land supply.

PAN 2/2010 is still valid, and is a material consideration. Therefore marketability is still a valid consideration in testing effectiveness. In Para 3.48 where it states “if a programmed shortfall of dwelling completions from the effective housing land supply arises, and this is not due to ‘marketing constraints’, this will be considered by the Council as it decides whether the principle of housing development on land not identified by this plan as suitable in principle for that purpose should be supported”. It therefore excludes marketability, which is contrary to PAN 2/2010. This could have an impact on delivery, and means that Policy HOU2 is not relevant and land cannot be brought forward for housing development if the reason for a shortfall in effective land is caused by marketability. This reference should be deleted.

Advice Box 1 should delete reference to any other housing paper prepared by the Council – only the latest agreed Housing Land Audit should be used to determine programming.

We query the specific reference in Policy HOU1 to the 2015 Housing Land Audit. While this is currently the most up to date Audit, it will be superseded in due course by subsequent Audits. The Policy should reflect this.

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:

Amend Policy HOU3 to be clear that the obligation on the homebuilder is to provide the land for affordable units, not necessarily the units themselves. Also consider a more flexible approach to delivery of affordable housing on sites, with the potential to deliver more than the 25% required on one site and perhaps less on another site, on a case by case basis to support the delivery of new homes.

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):

Homes for Scotland would support a greater degree of flexibility within the Affordable Housing policy (Policy HOU3). While we do not argue the 25% affordable housing percentage, we are aware of other planning authorities who operate an affordable housing ‘credit system’ whereby over provision on one site within the local authority area may provide ‘credit’ to allow for under provision on another site in the area under specific circumstances. Perth & Kinross Council currently operates this practice with homebuilders, adding flexibility and supporting delivery of homes faster or in locations where there is more need. Homes for Scotland would be happy to discuss this further with East Lothian Council to provide case studies of this in other areas across Scotland. The policy should also clearly state that the obligation on the developer is to provide land for affordable housing units only, not the units themselves – clarity is needed here as this has not been explicitly stated.

Homes for Scotland supports Policy HOU4 which includes a range of types of affordable housing tenure models within the definition of “affordable”.

HOMES FOR SCOTLAND REPRESENTATION

East Lothian Proposed Plan

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:

Homes for Scotland seeks further clarity on education contributions as set out below.

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):

Para 3.94 of the Proposed Plan refers to the Developer Contributions Framework Supplementary Guidance as the source for costs for education interventions, however we feel this could be clearer and more transparent on a few points. It would be better if the education analysis within the Technical Note 14 background paper was introduced to the Supplementary Guidance as an Annex to provide an evidence base for the contributions requested, at the moment the Technical Note provides this rather than the Guidance itself..

We understand that Scottish Futures Trust produces low, mean and upper estimates of construction / project costs. However the Developer Contributions Framework guidance does not confirm which of these estimates has been adopted by East Lothian Council. We also seek clarification and justification for the Council not adopting the actual Scottish Futures Trust figure, but a higher one. We appreciate the Council is building in risk, but do not consider that the development industry should take the burden of this. We suggest the figure should not be higher than the estimate, and justification provided to be more transparent. The homebuilding industry is simply looking for as much clarity and transparency as possible in the process, to allow calculations of contributions to be made as early as possible and set out very clearly upfront. We acknowledge that the draft Supplementary Guidance on Developer Contributions goes some way to delivering this clarity.

We consider that the LDP and/or Supplementary Guidance should acknowledge that where contribution levels exceed actual build costs (based on an open book approach), relevant contributions will be reimbursed.

Homes for Scotland queries the education contributions that seem to be extracting wider benefits not necessarily linked to the scale of development. In some cases a development will tip the school roll over capacity by a few pupils, but the development is expected to pay for new classrooms which are likely to result in surplus capacity. The Council or another developer could then benefit from the extra space. Greater clarification should be provided on the justification for this, giving necessary assurance that the contributions sought are, at

all times, consistent with the scale of development. In addition, it seems that the Council is seeking additional General Purpose space, dining areas and sports halls when a development is the tipping point for capacity. This again is not necessarily linked in scale or kind (Circular 3/2012 tests) to the impact of development as the rest of the school and the future population will benefit from the expanded facilities. Analysis should be provided of what will happen to the extra space created by the loss of the old sports hall, and how this could be productively used.

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:

Homes for Scotland does not agree with the principle of seeking developer contributions for healthcare facilities, therefore we suggest the removal of the requirement for developer contributions towards new facilities at Blindwells.

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):

While we acknowledge that the majority of sites within the Proposed Plan do not have a requirement for developer contributions towards healthcare facilities, Homes for Scotland disagrees with the principle of charging the homebuilding industry for the provision of healthcare facilities.

NHS as an organisation is funded through central government funding, and the burden should not be placed upon the development industry to cover any funding shortfall that may hinder the provision of primary healthcare facilities. Primary healthcare provision should not be for the council to provide for, and this certainly should not be for developer contributions to meet the cost of the necessary facilities. Most surgeries act as businesses, and developers should not be expected to supplement other businesses. It appears that a key issue with healthcare provision is the lack of practitioners rather than physical facilities. This is a national issue and not something that can or should be solved by the local authority or developers. We do not believe that these contributions conform to the tests set out within Circular 3/2012.

The delivery of more homes is a national priority and the private homebuilding industry, which delivers the vast majority of new housing across Scotland, should be supported to increase delivery of homes, rather than having increasing burdens placed upon it. Provision of new homes has a positive effect on health and wellbeing, and should be supported as such.

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:

Removal of text in Policy OS4 under Section 3: General Requirements, part i. "with a suitable buffer set out within Advice Box 2" and justification for the suggested 20-30m buffer zone and allotment provision and community event space included within Advice Box 2.

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):

Homes for Scotland queries the inclusion of a 20-30m buffer being applied to play areas within Advice Box 2 on Page 84 of the Proposed Plan. By way of an example, a 100 home development would require 60m² of play area per development = 6,000m² play area. If this was a square of approx. 77m x 77m, and a 30m buffer was required to be added, this would increase the area to 107m x 107m = 11,449m², almost double the required area. A 20m buffer (97m x 97m) would require 9,409m² area provided. We do not challenge the play area provision, but query the justification for the large land take that would be required to provide either a 20m or 30m buffer for the site.

We also query the justification for other requirements above 50 units within this Advice Box such as "possibly allotments, "community event space", "formal sports facilities" and "possibly sports facilities". Sports facilities are taken into account as part of the necessary developer contributions package and are detailed on a site specific basis within the draft Developer Contributions Framework supplementary guidance, therefore should not be added in to this guidance in an ad hoc manner.

We are concerned that this policy will lead to segregation of play areas and residential use, which raises issues of security and surveillance of the facilities.

HOMES FOR SCOTLAND REPRESENTATION
East Lothian Proposed Local Development Plan
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:

Remove reference to seeking developer contributions towards any rail improvement measures such as larger station car parks or platform lengthening within the text of the plan, within Prop T9 and T10, and within site specific proposals.

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):

Homes for Scotland fundamentally disagrees with the inclusion of contributions towards rail improvements including platform lengthening and increasing station car park sizes within the Developer Contributions Framework draft Supplementary Guidance, and reiterated within Prop T10: Safeguarding Land for Platform Lengthening, and Prop T9: Safeguarding of Land for Larger Station Car Parks.

Network Rail is funded by central government through Transport Scotland, and it is therefore not for the local authority to be burdened with improvements to Network Rail infrastructure either itself, or certainly not through seeking developer contributions towards improvement costs. Network Rail has an operator, who pays to operate the franchise as a commercial organisation, charging customers for use of the service. The increase in passengers over time as the population of East Lothian increases will, in turn, increase the revenue to the franchisee, and it is for Network Rail to seek any necessary remuneration from the operator to account for this and to increase the reinvestment back into the network to cover any necessary improvements.

Seeking developer contributions towards the cost of upgrading Network Rail facilities places an unnecessary burden upon the development industry. Delivering more homes across Scotland is a national priority for the Scottish Government, and in order to achieve this, homebuilders must be supported to deliver homes, rather than having additional burdens added. An accumulation of the necessary education and transport contributions together with these new burdens may raise issues with viability for some home builders, and has the potential to slow the delivery of new homes that we are in acute need of.

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:

Remove reference to enhanced Building Standard – ‘active’ sustainability level within this policy.

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):

Policy SEH2: Low and Zero Carbon Generating Technologies expects new buildings (except those listed within the policy) to meet an aspirational Building Standard level. We do not consider that planning has a role to prescribe the technology in a building, that is for Building Standards to do. We do not argue with the statement that new buildings should meet the energy requirements of Scottish Building Standards; however do not believe that this LDP policy should be imposing a more enhanced, aspirational standard. Minimal climate change gains can be made on an individual planning authority basis through this kind of policy expectation, and we suggest it would be far more beneficial to look at this from central government level across Scotland as a whole, perhaps through the Planning Review or any review of Building Standards, than on an individual authority by authority basis.

HOMES FOR SCOTLAND REPRESENTATION
East Lothian Proposed Local Development Plan
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:

Policy DC4: New Build Housing in the Countryside should include a category to allow for the redevelopment of vacant rural brownfield land. Furthermore it should allow for the expansion of existing settlement groups or clusters of homes of 4 or more houses.

Suggest amendment of Policy DC7: Development in the Edinburgh Green Belt to allow for development where the greenbelt is no longer serving greenbelt functions.

Suggest deletion of Policy DC8: Countryside Around Towns.

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):

Policy DC4: New Build Housing in the Countryside is overly restrictive and does not include the necessary flexibility to allow small settlements to grow and change over time to add to the diverse mix of settlements in East Lothian. There is currently no mechanism to allow small settlement groups or clusters to grow incrementally over time to make use of existing infrastructure in place to serve these clusters. This policy together with Policy DC5 and Policy DC8 are particularly restrictive.

We consider that Policy DC7 could be amended slightly to be a little less restrictive and allow for development in particular cases where greenbelt land is no longer serving greenbelt functions.

When reading Policies DC1 to DC5 as a whole, a very restrictive picture of housing in the countryside comes together. We query the overly restrictive policy, and also query the inclusion of Policy DC8: Countryside Around Towns. This policy seems to be including a sort of 'greenbelt' policy for development around towns, however we do not consider this necessary as the preceding policies are already as restrictive as a greenbelt policy, and this additional policy seems to be duplication. If the intention is for this policy is to direct future development towards more suitable areas for development, then these areas should be identified as such in order that they could come forward should a need/shortfall arise; or indeed if their development could deliver benefits such as supporting local services, employment or infrastructure.

**HOMES FOR SCOTLAND REPRESENTATION
East Lothian Proposed Local Development Plan
Section 6a OUR NATURAL HERITAGE**

2a. Soil Quality - What modifications do you wish to see made to the Soil Quality 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:

Delete reference in Policy NH7: Protecting Soils to “no other suitable site is available”.

2b. Please give any information/reasons in support of each modification suggested to the Soil Quality 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 consider that it is unreasonable, and often unfeasible to expect a proposal to assess other sites to prove that theirs is the only suitable site, and if the proposal in question is the only one coming forward, it would serve no purpose. We do not want to see any policy that could potentially hinder, or slow deliver of housing developments.

6a. Air Quality - What modifications do you wish to see made to the Air Quality 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:

Delete reference within Para 6.34 to developers contributing toward air quality mitigation measures associated with improvements to bus fleets.

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

Justification for Modification(s):

Para 6.34 under Air Quality refers to mitigation measures such as bus fleet improvements and relocation of bus stops. It then goes on to state that developers of major development sites in areas requiring air quality mitigation will be “expected to make appropriate and proportionate financial contributions towards these mitigation measures”. We seek clarity over what would exactly be required of developers here. If it is the case that improvements to bus fleets would be covered by this contribution, we seek justification for this. Bus operators are commercial entities and it is not reasonable that home builders should contribute towards improvement to that organisation which makes a profit from running the service. We do not consider that such a requirement would meet the tests of Circular 3/2012.

**HOMES FOR SCOTLAND REPRESENTATION
East Lothian Proposed Plan**

SECTION 7 - DESIGN (pages 137-141)

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:

Policy DP3 should be reworded to be more flexible in density to allow increase and decrease from the 30 dwellings per hectare average on a site by site basis. We suggest deletion of the final sentence of this Policy, replacing it with more flexible wording to ensure that the density proposed reflects the existing locality.

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):

Homes for Scotland considers that amending the wording of the policy to allow for an increase and decrease of the average 30dph figure would be more flexible and ensure that delivery of new homes across East Lothian will be encouraged and supported rather than hindered in any way, recognising the diversity in the range of sites allocated within the Plan, and focussing on placemaking aspects of delivery, including meeting market demands, rather than simply densities achieved.

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:

If the Development Briefs published for consultation alongside the Local Development Plan are to be adopted with the Plan, we suggest that the wording of Policy DP9 is amended to remove the obligation on the developer to “conform” with the Development Brief.

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):

Homes for Scotland is concerned that the Development Briefs published for consultation

along with the Proposed Plan have not been produced with any input from the homebuilding industry who will be delivering housing sites within the Briefs. These Briefs have been written by East Lothian Council together with SNH, and some Members have indicated that specific aspects of some Briefs contradict ongoing discussions with East Lothian Development Management officers.

We consider that these Briefs should hold very little weight and we have made separate representations on the Development Briefs to suggest that wording is added to explicitly state that these Briefs are works in progress to be used as a guide and that they will have very little weight in the decision making process.

We are concerned that if these Briefs are adopted by the Council alongside the Local Development Plan, and Policy DP9 remains worded in its current form, homebuilders will be required to “conform” to the content of Development Briefs for which they have had no input. This could have an impact on delivery of sites within the Briefs.

We consider that if Development Briefs were to be prepared in collaboration with developers, they will be far more deliverable, and more likely to be adhered to if they are prepared in partnership, rather than a Brief imposed on the developer. The process of a planning permission in principle application could be speeded up as a lot of key issues for the site could be covered in the preparation of the Development Brief. In some other authorities, a collaborative Development Brief has been used effectively as a Planning Permission in Principle, speeding up planning permission by giving developers confidence to go straight to submitting a detailed planning application. We are happy to provide examples of where this has been successful in other planning authorities with some of our Members.

Response ID ANON-ZMS3-3MZJ-H

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-10-01 00:09:11**

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

First name:

Martin

Surname:

Hotchkiss

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 resident/member of the public

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

Organisation:

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::

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 2d - Tranent Cluster Main Development Proposals

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

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

Justification for Modification(s):

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

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

Modifications(s) Sought:

The boundaries for the DR2 site should be amended to exclude the wooded area immediately to the east of the properties at Lochend Kennels (bounded to the south by the track that runs west to east and bounded to the east by the driveway that goes round to the north side of the properties. This area of land should be excluded from the proposed area of development to ensure that it is retained as woodland.

Also the "panhandle" of land that extends eastward past the southern boundary of the school and which separates the northern and southern parts of Lochend Woods should be excluded from PROP DR2.

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

Justification for Modification(s) :

For the area being proposed for development, the boundary immediately to the east of the properties at Lochend Kennels currently incorporates an area of woodland (bounded to the south by the track that runs west to east and bounded to the east by the driveway that goes round to the north side of the properties. This area of land should be excluded from the proposed area of development to ensure that it is retained as woodland.

It is also not clear what the "panhandle" of land that extends eastward past the southern boundary of the school and which separates the northern and southern parts of Lochend Woods is intended for. This area does not seem appropriate for residential development as there would be problems with access. Presumably some sort of improved access road would be required but this would run across the southern gateway to the school. Increased traffic on this access would be a major hazard for the school children. Also, developing this area would act to further isolate the different parts of Lochend Woods (deer and other animals regularly cross this strip of land to move throughout the woodland. Currently the area is a cohesive single area of countryside (woodland and open scrub). Developing this land would divide this area into smaller isolated areas that would further reduce the amenity value for locals who regularly use the area (e.g. dog walkers, cyclists, ramblers etc). Therefore, this area should also be excluded from the land proposed for residential development.

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

1a PROP DR1: Hallhill South West, Dunbar - What modifications do you wish to see made to Prop DR1 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

1b Please give any information/reasons in support of each modification suggested to Prop DR1 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

2a PROP DR2: Hallhill North, Dunbar - What modifications do you wish to see made to Prop DR2 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

Paragraph 2.138 and Prop DR2 should be removed altogether.

2b Please give any information/reasons in support of each modification suggested to Prop DR2 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

Access:

Although the site would be connected to the existing Hallhill South West site, it has very poor connections to the rest of Dunbar. Whilst pedestrian/cycle access may be possible through re-opening the rail underpass, this is likely to be extremely costly and difficult given its impact on the East Coast Main Line. The realistic feasibility of this crucial link should be addressed in detail before considering accepting the proposal.

However, road access will also be extremely difficult. Connecting via Brodie road would mean a ridiculously circuitous route to access the centre of town and even worse for accessing the western parts of the existing town (such as the Grammar School, Belhaven, and onwards to West Barns) despite the fact that they are geographically very close. The alternative existing route via Beveridge Row is extremely narrow, involving dangerous bends by the railway line and blind bends, hill brows and hidden dips to the south. There is no scope to widen the existing road north of the railway due to the existing housing and hospital on Beveridge Row. This route is also used as a pedestrian route for the Primary School children. Traffic on this road has already increased significantly. Care would also need to be taken to ensure that traffic does not increase on the existing narrow single carriageway dirt track/concrete road that runs west to east from Beveridge Row, past the Primary School, before turning south past Hallhill Steading. This road would need to be retained to maintain the existing rights of access between the properties at Lochend Kennels, Lochend Cottage and Hallhill Steading with both Brodie Road to the south-east and Beveridge Row and the A1 to the west. However, the road is single carriageway with blind bends, a very tight turn at Lochend Cottage, blind exits from the existing properties and a blind pedestrian gateway from Lochend Woods next to Hallhill Steading. It also provides one of the main pedestrian access points for the Primary School and a (poorly maintained) common pedestrian route to the rest of the town.

Environment:

Drainage is already an increasing problem at Lochend/Hallhill. The existing developments have changed the flow of drainage runoff leading to the woods becoming excessively waterlogged and many of the trees dying/becoming dangerous as well as a large marshy area developing in the centre of the field in which the development is proposed. These waterlogged areas have notably arisen since the existing developments have taken place over the last 10 years but have perhaps also been exacerbated by the lack of maintenance of existing drains.

There will also be significant impacts on the existing wildlife that use the woods and farmland around Hallhill/Lochend, including:

Mammals such as badgers, bats, hedgehogs, the native roe deer (in fact several deer have already died after getting trapped in the school fences which demonstrates the problems faced by wildlife when their habitats are encroached)

Amphibians such as frogs, toads, newts

A wide variety of woodland/farmland/seaside birds including: buzzards, kestrels, owls and several birds on the BOCC4 Red List such as: Lapwing, Cuckoo, Skylark, Song thrush, Mistle thrush, Tree sparrow, House sparrow, Yellowhammer and possibly more.

Infrastructure:

The town centre is already suffering from significant congestion, and lack of sufficient parking. The East Coast Main Line services are already at maximum capacity during the peak times with no scope to increase services on what is already a very busy line. Station parking facilities are also insufficient.

The existence of the train line creates a significant and insurmountable barrier for traffic connecting the huge new developments with the centre of town and the schools. There are only two ways to connect the north and south of the town: Beveridge Row, which is too small and cannot be improved; and Spott Road, which is already extremely busy, is liable to flooding at the underpass and with an awkward and busy junction at Queens Road.

The school development strategy is always one step behind and constantly playing catch up to meet the increasing demands of the runaway housing developments. Although there may be some scope to increase the size of the Primary Schools, the housing developments that are already under way are going to put extreme strain on the Grammar School. The Grammar School has extremely limited scope for expansion and is already going to have problems accommodating the existing booming Primary School population that will be moving up over the next few years. Adding to this with any of the additional developments suggested for Dunbar and the surrounding areas will surely be impossible to resolve.

Amenity:

The existing track from Hallhill Steading to Beveridge Row is commonly enjoyed by many local walkers/joggers/cyclists/families as a pleasant route taking in the woods and farmland. This is already being partly destroyed by the existing developments. Dunbar needs to retain some open spaces for the enjoyment of the existing inhabitants. It also needs time to adapt to the vast expansion seen over the past few years before rushing headlong into yet more development.

Boundaries:

For the area being proposed for development, the boundary immediately to the east of the properties at Lochend Kennels currently incorporates an area of woodland (bounded to the south by the track that runs west to east and bounded to the east by the driveway that goes round to the north side of the properties). This area of land should be excluded from the proposed area of development to ensure that it is retained as woodland.

It is also not clear what the "panhandle" of land that extends eastward past the southern boundary of the school and which separates the northern and southern parts of Lochend Woods is intended for. This area does not seem appropriate for residential development as there would be problems with access. Presumably some sort of improved access road would be required but this would run across the southern gateway to the school. Increased traffic on this access would be a major hazard for the school children. Also, developing this area would act to further isolate the different parts of Lochend Woods (deer and other animals regularly cross this strip of land to move throughout the woodland. Currently the area is a cohesive single area of countryside (woodland and open scrub). Developing this land would divide this area into smaller isolated areas that would further reduce the amenity value for locals who regularly use the area (e.g. dog walkers, cyclists, ramblers etc). Therefore, this area should also be excluded from the land proposed for residential development.

Archaeology:

There have been existing long cist burial sites found in the Lochend/Hallhill area. I have also myself found a stone age flint scraper in the field that is proposed for

Hallhill North site. Developing the site runs the risk of losing potential historic and cultural sites that may not be fully discovered by the sample archaeological investigations that would obviously be required.

3a PROP DR3: Hallhill Healthy Living Centre Expansion Land - What modifications do you wish to see made to Prop DR3 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

3b Please give any information/reasons in support of each modification suggested to Prop DR3 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

4a PROP DR4: Brodie Road, Dunbar - What modifications do you wish to see made to Prop DR4 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

4b Please give any information/reasons in support of each modification suggested to Prop DR4 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

5a PROP DR5: Land at Newtonlees, Dunbar - What modifications do you wish to see made to Prop DR5 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

Paragraph 2.141 and PROP DR5 should be removed.

5b Please give any information/reasons in support of each modification suggested to Prop DR5 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

The vast extra strain that this development would put on the town centre (traffic and parking), the Grammar School, transportation links, would be too much for the town to cope with, given that it is already struggling with the existing developments.

6a PROP DR6: Beveridge Row Belhaven, Dunbar - What modifications do you wish to see made to Prop DR6 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

6b Please give any information/reasons in support of each modification suggested to Prop DR6 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

7a PROP DR7: Land at Spott Road, Dunbar - What modifications do you wish to see made to Prop DR7 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

7b Please give any information/reasons in support of each modification suggested to Prop DR7 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

8a PROP DR8: Pencraig Hill, East Linton - What modifications do you wish to see made to Prop DR8 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

8b Please give any information/reasons in support of each modification suggested to Prop DR8 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

9a PROP DR9: Land at East Linton Auction Mart - What modifications do you wish to see made to Prop DR9 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

9b Please give any information/reasons in support of each modification suggested to Prop DR9 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

10a PROP DR10: Innerwick East, Innerwick - What modifications do you wish to see made to Prop DR10 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

10b Please give any information/reasons in support of each modification suggested to Prop DR10 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

11a PROP DR11: St John's Road, Spott - What modifications do you wish to see made to Prop DR11 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

11b Please give any information/reasons in support of each modification suggested to Prop DR11 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

12a Policy DR12: Development Briefs - What modifications do you wish to see made to Policy DR12 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

12b Please give any information/reasons in support of each modification suggested to Prop DR12 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

Section 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:

3.101 and PROP ED6. The paragraph implies that the sports pitch at the Grammar School would need to be "reprovisioned". There is no scope for such reprovisioning immediately anywhere immediately adjacent to the school. Any potential development of the Grammar School should not be allowed to reduce the existing adjacent sports pitch site.

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):

Any reprovisioning would require a site further from the school requiring pupils to travel there and back to participate in outdoor sports. This would not be appropriate or sensible.

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):

Response ID ANON-ZMS3-3MZA-8Submitted to **East Lothian Proposed Local Development Plan**Submitted on **2016-10-02 17:07:18****About You****1 What is your name?****First name:**

Joanna

Surname:

Greensit

2 What is your email address?**Email address:**

om

3 Postal Address**Address:****4 Please enter your postcode****Postcode:****5 Are you responding as (or on behalf of) a.....?**

Local resident/member of the public

6 What is your organisation and role (if applicable)?**Organisation:****Your role:****7 Are you supporting the plan?**

No

If Yes: Please include your reasons for support:**Section 2d - Tranent Cluster Main Development Proposals**

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

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

Justification for Modification(s):

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

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

2.166

This should be removed from the proposed LDP as a site for housing development.

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):

2.166

Having a major green field site will compromise the delivery of the brownfield (firestation) site which should be developed first. Once this is complete, greenfield sites should be considered only if additional housing is required.

There is a lack of public transport and facilities. The nearest train station at Drem already has insufficient car parking.

The cumulative effect of all 4 sites is unbalanced for the size of Gullane. Focus on one single brownfield site first.

This should be removed from the proposed LDP as a site for housing development.

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:

2.167

This should be removed from the proposed LDP as a site for housing development.

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):

2.167

Having a major green field site will compromise the delivery of the brownfield (firestation) site which should be developed first. Once this is complete, greenfield sites should be considered only if additional housing is required.

There is a lack of public transport and facilities. The nearest train station at Drem already has insufficient car parking.

The cumulative effect of all 4 sites is unbalanced for the size of Gullane. Focus on one single brownfield site first.

This should be removed from the proposed LDP as a site for housing development.

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:

2.168

This should be removed from the proposed LDP as a site for housing development.

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) :

2.168

Having a major green field site will compromise the delivery of the brownfield (firestation) site which should be developed first. Once this is complete, greenfield sites should be considered only if additional housing is required.

There is a lack of public transport and facilities. The nearest train station at Drem already has insufficient car parking.

The cumulative effect of all 4 sites is unbalanced for the size of Gullane. Focus on one single brownfield site first.

This should be removed from the proposed LDP as a site for housing development.

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) :

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-10-10 00:04:02**

About You

1 What is your name?

First name:

David

Surname:

Maitland

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 resident/member of the public

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

Organisation:

not applicable

Your role:

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

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

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

Modifications(s) Sought:

I object to the inclusions of 3 housing proposals as detailed in para 2.166, 2.167, 2.168. Specifically I request that proposals NK7 - Salcoats, NK8 - Fenton Gait East, and NK9 - Fenton Gait South be removed from the Local Development Plan.

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

Justification for Modification(s):

I believe the above will ruin the amenity of this beautiful Conservation Area and severely impact day to day life in the village adversely as these 3 sites exceeds what is reasonable in scale. The impact of the development of these sites will turn Gullane into a building site for 10 years and will impact tourism. I am not against development per se and support building on infill sites and brownfield sites like the Fire College site. (NK6) My basic problem is that these 4 sites inclusion in the LDP is over development and cannot be absorbed in a village the size of Gullane. Like most towns facilities in the village are already under strain but the added burden of the cumulative development on school and medical facilities will be impossible to deal with without major infrastructure investment and additional resources which need to be in place. This development of executive houses will attract families into the area who commute to Edinburgh and it is already impossible to park at the stations in Drem and Longniddry. Parking in the village would also be impossible and create road safety issues. I believe the

South East Scotland Strategic plan recognised that Gullane was one of the most inaccessible settlements in the region and has poor road and public transport access so I can see no sense it being included. I believe that inclusion of these 3 sites would adversely impact the development of the FIRE College site if it were to proceed and could leave the village with a derelict site while absorbing valuable agricultural land.

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

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

Remove from plan.

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):

I believe the above will ruin the amenity of this beautiful Conservation Area and severely impact day to day life in the village adversely as these 3 sites exceeds what is reasonable in scale . The impact of the development of these sites will turn Gullane into a building site for 10 years and will impact tourism. I am not against development per se and support building on infill sites and brownfield sites like the Fire College site.(NK6) My basic problem is that these 4 sites inclusion in the LDP is over development and cannot be absorbed in a village the size of Gullane. Like most towns facilities in the village are already under strain but the added burden of the cumulative development on school and medical facilities will be impos sible to deal with without major infrastructure investment and additional resources which need to be in place. This development of executive houses will attract families into the area who commute to Edinburgh and it is already impos sible to park at the stations in Drem and Longniddry . Parking in the village would also be impos sible and create road safety issues. I believe the South East Scotland Strategic plan recognised that Gullane was one of the most inaccessible settlements in the region and has poor road and public transport access so I can see no sense it it being included. I believe that inclusion of these 3 sites would adversely impact of the development of the FIRE College site if it were to proceed and could leave the village with a derelict site while absorbing valuable agricultural land.

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:

Remove from plan

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):

I believe the above will ruin the amenity of this beautiful Conservation Area and severely impact day to day life in the village adversely as these 3 sites exceeds what is reasonable in scale . The impact of the development of these sites will turn Gullane into a building site for 10 years and will impact tourism. I am not against development per se and support building on infill sites and brownfield sites like the Fire College site.(NK6) My basic problem is that these 4 sites inclusion in the LDP is over development and cannot be absorbed in a village the size of Gullane. Like most towns facilities in the village are already under strain but the added burden of the cumulative development on school and medical facilities will be impos sible to deal with without major infrastructure investment and additional resources which need to be in place. This development of executive houses will attract families into the area who commute to Edinburgh and it is already impos sible to park at the stations in Drem and Longniddry . Parking in the village would also be impos sible and create road safety issues. I believe the South East Scotland Strategic plan recognised that Gullane was one of the most inaccessible settlements in the region and has poor road and public transport access so I can see no sense it it being included. I believe that inclusion of these 3 sites would adversely impact of the development of the FIRE College site if it were to proceed and could leave the village with a derelict site while absorbing valuable agricultural land.

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:

Remove from plan

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) :

I believe the above will ruin the amenity of this beautiful Conservation Area and severely impact day to day life in the village adversely as these 3 sites exceeds what is reasonable in scale . The impact of the development of these sites will turn Gullane into a building site for 10 years and will impact tourism. I am not against development per se and support building on infill sites and brownfield sites like the Fire College site.(NK6) My basic problem is that these 4 sites inclusion in the LDP is over development and cannot be absorbed in a village the size of Gullane. Like most towns facilities in the village are already under strain but the added burden of the cumulative development on school and medical facilities will be impos sible to deal with without major infrastructure investment and additional resources which need to be in place. This development of executive houses will attract families into the area who commute to Edinburgh and it is already impos sible to park at the stations in Drem and Longniddry . Parking in the village would also be impos sible and create road safety issues. I believe the South East Scotland Strategic plan recognised that Gullane was one of the most inaccessible settlements in the region and has poor road and public transport access so I can see no sense it it being included. I believe that inclusion of these 3 sites would adversely impact of the development of the FIRE College site if it were to proceed and could leave the village with a derelict site while absorbing valuable agricultural land.

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) :

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):

Response ID ANON-ZMS3-3MZQ-R

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-10-11 09:49:36**

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

First name:

Emma

Surname:

Hay

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 resident/member of the public

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

Organisation:

Your role:

7 Are you supporting the plan?

Yes

If Yes: Please include your reasons for support:

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:

Removal of site MH13

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):

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.

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:

2.19 - Strategic Landscape Mitigation

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):

2.19 - green belt is not an adequate designation to provide a secure long term safeguard preventing settlement coalescence in the area. Stronger protection of settlement separation is needed, and should be reflected in this paragraph. The paragraph references to land to the west of Wallyford are supported, but are not consistent with the release of land at Howe Mire, which I object to.

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:

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):

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:

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.

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):

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.

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:

Removal of this site from the development plan.

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):

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.

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:

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):

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 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:

Green Belt - DC7: Development in the Edinburgh Green Belt

Either a separate policy or an addition to this policy is needed to explain that the Green Belt designation is also being used to provide a long term safeguard for settlement separation. Although Green Belt is not a strong enough tool to achieve this, there needs to be a clear statement that the Council is using it as such or there needs to be a separate policy which specifically safeguards land for settlement separation.

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):

As worded currently, the Green Belt policy does not provide a clear basis for the long term safeguarding of settlement separation despite the policy being used for this purpose. Green belt is not a tool designed to provide the long term safeguard needed in areas of pressured growth such as the Musselburgh cluster.

The wording of the policy either needs to be changed to explicitly reference long term settlement separation safeguarding, or preferably a new policy needs to be introduced which gives the appropriate, robust and unequivocal protection to the remaining green areas between settlements.

Additional Comments

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:

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

Justification for Modification(s):

File upload:

No file was uploaded

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-10-11 10:13:28**

About You

1 What is your name?

First name:

Gill

Surname:

Highet

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 resident/member of the public

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

Organisation:

Your role:

7 Are you supporting the plan?

Yes

If Yes: Please include your reasons for support:

I think the plan is comprehensive and will support the development of local communities

Section 2d - Tranent Cluster Main Development Proposals

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

I support the housing development on the condition that a new access road is created at the east end of the village to support the heavy plant that will be required during the building period and the additional traffic that will accrue from the creation of 20 new houses.

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

Justification for Modification(s):

In my view, the only road that provides access to the proposed building site - Lamington Road - is not fit to support this development.

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

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

Justification for Modification(s):

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-10-16 14:05:53**

About You

1 What is your name?

First name:

Andrew

Surname:

Coulson

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:

Pinkie Cleugh Battlefield Group

Your role:

Secretary

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

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:

Removal of designation MH13

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):

Proposal MH13 is incompatible with Policy CH5 (p 135). The development will further compromise the integrity and character of the battlefield area, which has already been committed to serious damage by adjacent development MH12 (regretably, no policy corresponding to Policy CH5 was in place at the time of the application, refusal and appeal for proposal MH12).

The HES Inventory of Battlefields says of this area specifically "The battle was fought on the open ground to the east of Inveresk, around the Howe Mire..." and that it is a particularly significant feature of this site, that the open fields make it possible to envisage the battlefield as it was seen through the eyes of the historic participants, and to trace their manoeuvres upon it. Taken together with the apparently now unstoppable development MH12, this housing development would drive a destructive wedge through the middle of the National Inventory defined battlefield area, destroying its character and integrity.

Development MH13 extends to the immediate vicinity of the Battlefield Memorial Stone, off Salter's Road, a site that was chosen because of the excellent oversight it provides of the approach routes of both armies to their encounter. Paragraph 2.40 requires that there should be 'extensive' landscape planting to mitigate other harmful impacts of the development, and it is inevitable that this will further remove whatever sightlines into the battlefield area remain when the housing is constructed.

A commemoration ceremony is held every year on September 10th at the Memorial Stone. Growing numbers have attended this ceremony in recent years (67 in 2016), as it has been increasingly widely recognised that the site is a field of honour, where more than 10,000 Scots died in defence of their country against invasion.

The Development Brief refers in no way to the status of this area as the centre of the Inventory-designated battlefield area, or to the associated policy CH5. It seems, therefore, that this proposal pre-dates the inclusion of the area in the Inventory, and the adoption of policy CH5. If so, proposal MH13 can only have been included in the LDP by mistake, and we submit that it should be entirely removed.

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:

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):

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:

No modifications are 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):

Regretably, there was no policy corresponding to the current proposed policy CH5 in place at the time of this application, refusal and appeal. Therefore, it does

not seem possible now to make a condition on the development to limit or mitigate in any way the destructive effects of this extensive intrusion into what HES has delimited as a battlefield of national historical importance.

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:

Remove PROP MH13 -- paras 2.38, 2.39, 2.40 and associated text box

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):

Proposal MH13 is incompatible with Policy CH5 (p 135). The development will further compromise the integrity and character of the battlefield area, which has already been committed to serious damage by adjacent development MH12 (regretably, no policy corresponding to Policy CH5 was in place at the time of the application, refusal and appeal for proposal MH12).

The HES Inventory of Battlefields says of this area specifically "The battle was fought on the open ground to the east of Inveresk, around the Howe Mire..." and that it is a particularly significant feature of this site, that the open fields make it possible to envisage the battlefield as it was seen through the eyes of the historic participants, and to trace their manoeuvres upon it. Taken together with the apparently now unstoppable development MH12, this proposal would drive a destructive wedge through the middle of the National Inventory-defined battlefield area, destroying its character and integrity.

Development MH13 extends to the immediate vicinity of the Battlefield Memorial Stone, off Salter's Road, a site that was chosen because of the excellent oversight it provides of the approach routes of both armies to their encounter. Paragraph 2.40 requires that there should be 'extensive' landscape planting to mitigate other harmful impacts of the development, and it is likely that this will further remove whatever sightlines into the battlefield area remain when the housing is constructed.

A commemoration ceremony is held every year on September 10th at the Memorial Stone. Growing numbers have attended this ceremony in recent years (67 persons of all ages in 2016), as it has been increasingly widely recognised that the site is a field of honour, where more than 10,000 Scots died in defence of their country against invasion.

The Development Brief refers in no way to the status of this area as the centre of the Inventory-designated battlefield area, or to the associated policy CH5. It seems, therefore, that the proposal pre-dates the inclusion of the area in the Inventory, and the adoption of policy CH5. If so, proposal MH13 can only have been included in the LDP by mistake, and we submit that it should be entirely removed.

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:

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):

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

Response ID ANON-ZMS3-3MFU-8

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-10-18 23:09:24**

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

First name:

David

Surname:

Thomson

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 resident/member of the public

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

Organisation:

Resident

Your role:

Home owner

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

Section 1 - Introduction (pages 1-10)

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

Modification(s) sought::

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

Justification for Modification(s):

Section 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):

Section 2d - Tranent Cluster Main Development Proposals

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

Modifications(s) Sought:

TT1. I wish to see the proposal of 550 homes abandoned.

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

Justification for Modification(s):

As a resident of _____, a property I purchased in June 2012, I have major concerns at the proposed housing development at Windygoul South.

At the time of purchase I was assured by the developer, Waker Group, that no building of any kind could take place in this area for seventeen years. This was a significant consideration when purchasing my property. I believe that my property holds its value by virtue of the greenfield views it enjoys. The prospect of the building of 550 homes _____ would in my opinion cause significant disruption to my quality of life. The dust, noise and traffic pollution emanating from such a development would cause significant disruption to the residents

This development would also have a dramatic impact to the volume of vehicular traffic through these areas which would undoubtedly impact on the school children walking to and from Windygoul Primary School.

I also have concerns as to the type of housing to be built. Is it social housing, private housing or a mix? Assuming that an element of social housing will be included in the development I am concerned as to whether this may have a negative effect on the value of my home. Whilst I appreciate the need for social housing I do not believe that it should be to the detriment of the owners of the existing housing in the area.

I strongly object to this development.

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

TT3. Abandon this development.

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

Justification for Modification(s):

As a resident of _____ a property I purchased in June 2012, I have major concerns at the proposed employment development at Windygoul South.

At the time of purchase I was assured by the developer, Waker Group, that no building of any kind could take place in this area for seventeen years. This was a significant consideration when purchasing my property. I believe that my property holds its value by virtue of the greenfield views it enjoys. The prospect of the building "employment opportunities" _____ would in my opinion cause significant disruption to my quality of life. The dust, noise and traffic pollution emanating from such a development would cause significant disruption to the residents of _____.

This development would also have a dramatic impact to the volume of vehicular traffic through this area.

I also have concerns as to the type of employment opportunities.

There are several commercial buildings in Tranent town centre which are, and have been for some considerable time, unoccupied. If there is such a demand for employment opportunities should we not be utilising the properties which already exist? The properties I refer to are the civic square properties such as the former community alarm building, the old rent office, the old library, the old infant school and Faside Lodge. I also believe that there are units available at Macmerry industrial estate. Development land on Elphinstone Road has also been for sale for a number of years. I therefore doubt the validity of the need for additional employment opportunities to be built at Windygoul South when the current buildings and development opportunities have failed to attract investment.

I strongly object to this development.

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

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

Justification for Modification(s):

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

1a General Urban Development Policies - What modifications do you wish to see made to this 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 General Urban Development Policies 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 Planning for Employment - What modifications do you wish to see made to the Planning for Employment 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 Planning for Employment 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 Tourism - What modifications do you wish to see made to the Tourism 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 Tourism 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):

Response ID ANON-ZMS3-3MXN-K

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-10-19 11:32:10**

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

First name:

David

Surname:

Campbell

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 resident/member of the public

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

Organisation:

East Lothian Panel AHSS

Your role:

Member

7 Are you supporting the plan?

Yes

If Yes: Please include your reasons for support:

Because the Plan is essential to securing orderly development.

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::

Section 1 – Introduction, p 6

Addition to §1.41, line 8, after "However, the very characteristics which attract people to East Lothian are at risk of being lost if new development is not introduced sensitively."

Add: Nowhere is this more true than of the built heritage.

Section 1 – Introduction, p 8

Insert 2 new sentences at end of § 1.58:

On conservation, the Council is required to treat the advice of HES [and SNH] as a material considerations in planning decisions. The Council will work with these national bodies to achieve a wider public understanding and appreciation of their important role.

Section 1 – Introduction, p 9

Recast opening sentence of § 1.61, first subparagraph of section headed "Promote suitable development" as follows:

To make efficient use of land, buildings and infrastructure and to conserve East Lothian's natural and built cultural heritage. Priority will be given to the

development of previously developed land . . . etc

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):

Justification, p6. The importance of the built heritage is brought out forcefully in the opening paragraphs of this section. Yet references to the cultural heritage throughout the plan tend to be muted or, in some cases, absent (as here), where a reference might be most expected.

Justification, p8. A list of legal and practical constraints cries out for a mention of these eminent bodies. An addition would also clarify the passing references to HES which occur later in the Plan. SNH is mentioned more rarely, if at all, but a reference to its pre-eminence would appear to be appropriate and would increase public awareness of the framework within which the Council has to operate.

Justification, p9. Given the emphasis on the natural and cultural heritage in the first pages of the Introduction, it would appear important for conservation to get a mention in the Plan's "Vision." As the draft stands, the omission is so glaring as to be misleading.

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:

Any comments on the proposed "clusters" will be submitted separately. On a general point: Insert, after the reference to "the town centre first principle" in the penultimate sentence of §2.10:

(see §3.4)

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):

This is needed for ease of reference. As the paragraph stands, its invocation of a new doctrine is almost as surprising as seeing a rabbit pulled from a hat. For further comment on the principle itself, please see comment on p57, below.

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

1a General Urban Development Policies - What modifications do you wish to see made to this 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:

Section 3- Town Centres, Employment and Tourism, p 57, §3.4

Insert new sentence at line 7 of §3.4, after ". . . and the role and function of the centre." as follows:

Many of these centres are of great cultural importance, and all development proposals, including road improvement schemes, will be assessed against all relevant Local Development Plan policies. Large-scale developments . . . etc

1b Please give any information/reasons in support of each modification suggested to the General Urban Development Policies 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):

This caveat draws directly on the much-needed constraint placed on Tourism in §3.26 (on which, please see further comments below). A reference to road improvement schemes would be useful because historic town centres are especially vulnerable to this type of development. In the past, much of their economic strength lay in the way all roads led into them. In many cases this advantage is now a curse, both in terms of parking and through traffic. The Scottish Government's Design policies emphasise the need for sensitivity in dealing with these pressures.

2a Planning for Employment - What modifications do you wish to see made to the Planning for Employment 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 Planning for Employment 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 Tourism - What modifications do you wish to see made to the Tourism 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:

Section 3 - Town Centres, Employment and Tourism, p 63, §3.26

Insert addition to final sentence as follows:

. . . relevant Local Development Plan policies, including those on enabling development ((policy DC5).

3b Please give any information/reasons in support of each modification suggested to the Tourism 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):

A cross reference would be helpful here, a reminder that the highly contentious concessions on enabling development which disfigure certain large-scale tourist developments across the county cannot be treated as precedents

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:

Section 5 – Diverse Countryside and Coastal Areas, p120

Recast final sentence of Policy DC2 as follows:

In all cases, no demolition should be undertaken before planning approval is granted. As part of planning permission an archaeological record may be required. HES guidance on the conversion of historic agricultural buildings should be followed and all original features such as doors, windows, roofing materials and ground treatment preserved where possible. For new work, the external finishes . . . etc

Section 5 – Diverse Countryside and Coastal Areas, pp122-124

Adjust Policies DC7 – DC9 as follows:

DC7. Third relaxation to read; "a national requirement." (remainder deleted).

DC8. Delete conditions ii) and iii). (ie retain only those relaxations referring to the green network and to essential infrastructure)

DC9. Delete relaxation 2 (relating to public benefits)

DC10. Delete all except the first sentence.

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):

Justification, p120

In far too many cases the historic fabric of existing rural buildings has been ruthlessly and prematurely destroyed without any thought of conservation. The Plan is an opportunity to remind developers of the abundance of guidance available, and to put them on notice that the Council will not tolerate further abuses.

Justification, pp122-124

It is undesirable to hint at the possibility of development in areas the Council is determined to protect. The flexibilities which might be allowable under the Green Network policy are better considered as part of the Green Network Strategy.

Section 6a - Our Natural Heritage (pages 125-132)

1a Biodiversity and Geodiversity - What modifications do you wish to see made to the Biodiversity and Geodiversity 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:

Section 6a – Our Natural Heritage, p126

Insert a reference to SNH at some point in pp 125-132, possibly as a new policy on p126:

NHS1. All development proposals affecting the natural environment will be required to conform with relevant guidance from SNH.

1b Please give any information/reasons in support of each modification suggested to the Biodiversity and Geodiversity 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):

This suggestion is consistent with the comment submitted below in relation to the cultural environment (the latter being the main concern of this group of comments). It is made with some diffidence, but the absence of any reference to SNH seems surprising in this section.

2a Soil Quality - What modifications do you wish to see made to the Soil Quality 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 Soil Quality 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 Trees and Woodland - What modifications do you wish to see made to the Trees and Woodland 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 Trees and Woodland 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 Protecting and Enhancing the Water Environment - What modifications do you wish to see made to the Water Environment 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 Water Environment 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 Sustainable Drainage Systems (SuDs) - What modifications do you wish to see made to the SuDs 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 Sustainable Drainage Systems (SuDS) 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 Flood Risk - What modifications do you wish to see made to the Flood Risk 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 Flood Risk 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 Air Quality - What modifications do you wish to see made to the Air Quality 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 Air Quality 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 Noise - What modifications do you wish to see made to the Noise 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 Noise 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 6b - Our Cultural Heritage (pages 133-136)

1a Development Affecting Listed Buildings - What modifications do you wish to see made to Affecting Listed Buildings 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:

Section 6b – Our Cultural Heritage, p133

Insert, with priority, new policy CH1, renumbering further policies accordingly:

CH1. All development proposals affecting the cultural environment will be required to conform with relevant guidance from HES.

1b Please give any information/reasons in support of each modification suggested to the Development Affecting Listed 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) :

Overall, the Cultural Heritage Section reads well but is a little thin, in part because the emphasis appears to have shifted away from generally applicable policies to the development of supplementary planning for individual Conservation Areas. This change of emphasis (assuming it is the Council's intention) makes sense in theory. On signage, for example, what would be appropriate for a popular seaside resort might well be completely wrong in, say, a historic market town. But it is not new; and the devil is in the detail. It will be difficult to comment helpfully until supplementary planning guidance has been drafted. Generally applicable policies will in any case still be needed, the more so because there would appear to be a dangerous gap, caused by the disappearance of the detailed conservation policies adopted in earlier plans. It is fair enough for these to go, seeing they were frequently paraphrases of the now superseded guidance provided by HES's predecessor body, HS. But something needs to appear in their place. The ideal candidate is the new, more flexible guidance contained in HES guidance notes, which deserve much wider dissemination. They could be incorporated into the Plan without any need for elaboration or paraphrase if the simple approach suggested above were adopted. A neat, elegant solution, which may commend itself to the Council. Public understanding of conservation issues would be improved if the notes were highlighted this way. Another benefit of relying on HES guidance more systematically would be the improved understanding of conservation issues which could be expected from the Council's own case officers, not all of whom have conservation qualifications.

2a Development Affecting Conservation Areas - What modifications do you wish to see made to the Development Affecting Conservation 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:

Section 6b – Our Cultural Heritage, p133

Insert new final sentence to §6.43:

Many of the boundaries to these areas are very old and will be reviewed.

Section 6b – Our Cultural Heritage, p134

Add new final sentence to Policy CH2:

Guidance on more general problems such as door and window replacement (including double glazing), solar panels and roof lights will also be available, on the basis that HES guidance should always be consulted.

2b Please give any information/reasons in support of each modification suggested to the Development Affecting Conservation 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):

Justification, P133. The south side of Tranent High Street and the area of good, early council housing along the north edge of the Haddington Conservation Area are examples of areas in need of reappraisal. There are many others. The reluctance of the Council to examine this issue is understood, hence the muted reference suggested. Ideally a policy commitment is desirable, either as a free-standing new policy, or as an expansion of Policy CH2.

Justification, p134. The alternative to this is the cumbersome one of rewriting HES guidance notes in the form of CH policies, a procedure which is less likely to be effective than coopting HES guidance into the Plan in the simpler way suggested.

3a Development Affecting Scheduled Monuments and Archaeological Sites - What modifications do you wish to see made to the Development Affecting Scheduled Monuments and Archaeological 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:

3b Please give any information/reasons in support of each modification suggested to the Development Affecting Scheduled Monuments and Archaeological 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):

4a Development Affecting Gardens and Designed Landscapes - What modifications do you wish to see made to the Development Affecting Gardens and Designed Landscapes 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 Development Affecting Gardens and Designed Landscapes 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 Area Based Cultural Heritage Policies - What modifications do you wish to see made to the Area Based Cultural Heritage Policies 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 Area Based Cultural Heritage Policies 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):

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-10-19 16:12:15**

About You

1 What is your name?

First name:

Lisa

Surname:

Helbig

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 resident/member of the public

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

Organisation:

Your role:

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

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:

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):

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:

-dont allow building on this site!

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):

-beautiful untouched land

-used frequently by a healthy deer population

-used by dog walkers

-quiet rural land

-additional cars/traffic from new residents

-land used by a healthy bat population at night time since no light pollution is in place on the land yet
-estate kids play on upper meadow with bikes etc which will be taken away by new road layout
-not all neighboring houses have been notified!
-noise and dust from building site

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:

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):

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

Response ID ANON-ZMS3-3MJP-7

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-07 00:49:41**

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

First name:

Elaine

Surname:

Edwardson

2 What is your email address?

Email address:

m

3 Postal Address

Address:

4 Please enter your postcode

Postcode:

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

Local resident/member of the public

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

Organisation:

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::

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

Justification for Modification(s):

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

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

Modifications(s) sought:

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.

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:

1. Access to be taken from the B6415: site to be treated in two parts (site 1 and site 2) with a single vehicular access to each part, no vehicular connection is to be created across the minor watercourse. Formal specimen tree avenue planting and a 3m wide shared use path for walking and cycling are required along the B6415 frontage. The existing stone wall must be repaired and rebuild as necessary.

3. The watercourse should be retained and enhanced with a bio-diverse designed landscape edge, forming a green corridor of at least 10m width.

4. This is a sensitive site in landscape terms – a minimum 30m build set back will be required from the A720, behind a 15m-wide noise attenuation mounding with specimen tree and understorey planting.

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):

1. The Old Craighall road infrastructure is unsuitable for this proposed development. Additional entrances on the Old Craighall Road, will just increase the hazards on what is already a very busy and dangerous road.

There is no evidence of any traffic calming measures in this plan.

This development of employment will only increase the amount of traffic coming into the village.

The local train station is 30 minutes walk away. The nearest bus stop which provides a service into town is at least 20 mins walk away.

So it is inevitable that people will commute to this area via car and I can guarantee you will not provide sufficient car park space for this.

So the question is where are these employees going to park ?

Parking in the village is already at a premium whereby some of the existing residents are already forced to park on the wider parts of the pavements. This will just exacerbate the situation.

It's envisaged that this build will cause a constant disruption to the existing residents and a disruption to their services including water, electricity and gas.

This proposed plan does not maintain the identity and character of Old Craighall. This will destroy the secluded nature of the village itself and removing the green belt status.

The surrounding open countryside are one of the many reasons why longstanding residents in Old Craighall choose to live here.

3. The watercourse should be retained and enhanced with a bio-diverse designed landscape edge, forming a green corridor of at least 10m width. !!!

That is approx 32 feet wide !! How are you going to form a green corridor 32 feet wide when residents gardens and houses run parallel to this watercourse. Their septic tanks also overflow into this watercourse so are you going to re-route those ?

This watercourse runs under the A1 and eventually flows into the River Esk.

By all means clean it up but increasing the width brings no benefit to the village.

4. "This is a sensitive site in landscape terms" !!! Why does the new development of employment land justify better road traffic noise measurements than that of the village itself ? You're providing a minimum 30m build set back from the A720 but only 15m build setback from B6415 !!! I don't want to see a big industrial estate across the road from me.

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:

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):

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 4 - Our Infrastructure & Resources (pages 88-117)

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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:

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:

No file was uploaded

Response ID ANON-ZMS3-3MFT-7Submitted to **East Lothian Proposed Local Development Plan**Submitted on **2016-10-21 08:56:51****About You****1 What is your name?****First name:**

Margaret

Surname:

Reid

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 resident/member of the public

6 What is your organisation and role (if applicable)?**Organisation:****Your role:****7 Are you supporting the plan?**

No

If Yes: Please include your reasons for support:**Section 2b - Prestonpans/Cockenzie/Port Seton/Longniddry Cluster Strategy Map (pg 23)****1a What modifications do you wish to see made to the Strategy map for the Prestonpans/Cockenzie/Port Seton/Longniddry Cluster?**

Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question. Do you have any comments to make on the

Modifications(s) Sought :

Reference EGT1 should be applied to the former Power Station site only - not to the surrounding land, which should retain its designation as Public Open Space and Countryside.

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

The area shown on the map accompanying the Local Development Plan (inset Map 32) extends well beyond the site of the former Cockenzie Power Station. The majority of this land is currently designated, in the East Lothian Local Plan 2008, as Countryside (DC1) or Public Open Space (C3). The land associated with power generation extends to the areas of land covered by the main power station building, transformer building, coal plant and the coal conveyor buildings. This is the site allocated in the adopted 2008 local plan as NRG1.

The proposed changes are not a requirement of National Planning Framework 3 and appear to be seeking to extend the boundaries of the former Power Station site.

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

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

Modifications(s) Sought:

2.49 ELC should modify the LDP to accommodate the dispersed spatial strategy - rather than the compact strategy.

2.51 Port-related developments should be removed from potential developments.

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

Justification for Modification(s):

2.49 The Preferred Approach of compact spatial strategy - concentrating development in the west of the county risks removing much of the public and amenity land for the existing communities.

2.51 Energy related uses, manufacturing, servicing and potentially port related developments are not compatible with the dense residential strategy being proposed under the Plan or with the existing rural residential nature of the area.

I would ask that ELC uphold their views at paragraphs 2.55 & 2.56 with regard to Strategic Landscape Mitigation where they state '2.55 There are areas of land outwith the green belt that are also under development pressure. These are between Prestonpans, Cockenzie, the allocated land at Blindwells and Tranent. Development in these locations would lead to the coalescence of settlements, undermine their character and setting, compromise cultural heritage assets, including battlefields, and / or lead to the loss of the best prime quality agricultural land. The combination of these environmental constraints points to a need to restrain further built development here which, individually or cumulatively, would undermine related objectives. A Countryside Around Town Designation applies to land between these neighbouring settlements. Around Town Designation, to ensure Prestonpans, Cockenzie, Tranent, Blindwells and Longniddry retain their separate identities. This will provide active travel opportunities to link communities, growth areas and places beyond them together. Opportunities for recreation and habitat creation and connection will be delivered as part of the multifunctional Green Network. 2.56 Strategic Green Network opportunities will be delivered, including within the Countryside.'

Additionally paragraph 2.57 states that 'The site of the Battle of Prestonpans is designated, as identified by the National Inventory.' Please may this remain so - and it is not designated for industrial use.

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

1a PROP PS1: Longniddry South - What modifications do you wish to see made to Prop PS1 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.

Modification(s) Sought:

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1b Please give any information/reasons in support of each modification suggested to Prop PS1 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

2a PROP PS2: Land at Dolphingstone North, Prestonpans - What modifications do you wish to see made to Prop PS2 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 Prop PS2 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

3a Policy PS3: Development Briefs - What modifications do you wish to see made to Policy PS3 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 Policy PS3 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-10-24 14:52:17**

About You

1 What is your name?

First name:

Toby

Surname:

Durant

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 resident/member of the public

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

Organisation:

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::

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

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

I request SALTCOATS (NK7) be removed from the proposed LDP.

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):

The cumulative effect of including sites NK7, NK8 and NK9 in addition to NK6 in Gullane would damage leisure and recreation opportunities in a village thriving on tourism and have negative impact on the amenities for local people.

The cumulative impact on Gullane and its rural road network has not been thoroughly assessed, in particular the C111 towards West Fenton and beyond to Fenton Barns and Luffness, where use by pedestrians, cyclists, runners and horse riders would become unsafe.

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

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:

I request FENTON GAIT EAST (NK8) be removed from the proposed LDP.

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):

The cumulative effect of including sites NK7, NK8 and NK9 in addition to NK6 in Gullane would damage leisure and recreation opportunities in a village thriving on tourism and have negative impact on the amenities for local people.

The cumulative impact on Gullane and its rural road network has not been thoroughly assessed, in particular the C111 towards West Fenton and beyond to Fenton Barns and Luffness, where use by pedestrians, cyclists, runners and horse riders would become unsafe.

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

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:

I request FENTON GAIT SOUTH (NK9) be removed from the proposed LDP.

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) :

The cumulative effect of including sites NK7, NK8 and NK9 in addition to NK6 in Gullane would damage leisure and recreation opportunities in a village thriving on tourism and have negative impact on the amenities for local people.

The cumulative impact on Gullane and its rural road network has not been thoroughly assessed, in particular the C111 towards West Fenton and beyond to Fenton Barns and Luffness, where use by pedestrians, cyclists, runners and horse riders would become unsafe.

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

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) :

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-10-27 15:45:13**

About You

1 What is your name?

First name:

Chris

Surname:

Crosby

2 What is your email address?

Email address:

3 Postal Address

Address:

Please enter your postcode

Postcode:

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

Local resident/member of the public

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

Organisation:

None

Your role:

N/A

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

Section 1 - Introduction (pages 1-10)

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

Modification(s) sought::

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

Justification for Modification(s):

Section 2d - Tranent Cluster Main Development Proposals

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

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

Justification for Modification(s):

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

Modifications(s) Sought:

1.19

1.25

Conservation area constraints

1.19 Suggests that by 2034 pensionable age population will increase by 43% and those over 75 by 95%. East Saltoun has no doctor within 6 miles ...is this a sensible location to promote 75 new homes?

1.25 Relates to the working age population who are likely to purchase new homes in East Saltoun . Probably half or more will elect to commute into Edinburgh as there is no convenient rail or bus service. This will put considerable strain on the rather poor roads linking the main trunk roads A1 and A68. The properties (apart from the 25%affordable housing) are likely to be higher value and not necessarily in a location that could be effectively marketed to young couples. Poor or no local facilities...a primary school that can't easily be expanded.

Conservation area constraints. Quoting from 2.106 'a masterplan for the site will be required to integrate the site with the village and surrounding landscape ' Conservation suggests that development proposals should be designed to 'preserve or enhance' As there is no suggestion that the development is designed to preserve we come to enhance. This seems rather a tall order for 75 homes that are to be placed in a field that at present is providing sustainable crops, an open view on entrance to the village on the B6355 and Petersmuir Road. A suggestion of allowing the building of 2 storey homes and a green woodland boundary that would still further reduce the distant views that make this area so attractive. A much smaller scale development, more in keeping with the size of the village is surely one that would garner support from a majority of residents?

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

Justification for Modification(s) :

Reducing the number of homes up to 20 would be sellable to the village, sustainable, marketable, in proportion to the size of population and not put pressure on the local primary school and sewerage system.

Too many houses will put potential buyers off, wanting a 'quiet ' area not a housing estate with continued noise and future development disruption. The plan has only one entry road which could become severely congested if a 'phase 2 ' were initiated.

Those wanting a more lively life will not buy here anyway as the infrastructure, wine bars supermarket etc are not close at hand.

As there is no provision for mains gas and likelihood of it, perhaps the council should put teeth into it's green credentials and insist the new homes are heated by ground heat pumps?

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

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

Justification for Modification(s):

Response ID ANON-ZMS3-3MXH-D

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-10-28 13:48:39**

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

Gillian

Surname:

Kyle

2 What is your email address?**Email address:**

Gillian.Kyle@sportscotland.org.uk

3 Postal Address**Address:**

sportscotland
Doges
Templeton on the Green
62 Templeton Street
Glasgow
G40 1DA

4 Please enter your postcode**Postcode:**

G40 1DA

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

Other

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

sportscotland

Your role:

Planner

7 Are you supporting the plan?

Yes

If Yes: Please include your reasons for support:

Yes - subject to minor modifications

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

1a General Urban Development Policies - What modifications do you wish to see made to this 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 General Urban Development Policies 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 Planning for Employment - What modifications do you wish to see made to the Planning for Employment 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:

Insert specific reference to recreational use

Policy EMP2: Operational Harbours - Within harbours areas the Council will give preference to uses that relate to fishing, other industry or recreational use connected with the harbour. The Council will consider other uses provided they do not prejudice these uses.

2b Please give any information/reasons in support of each modification suggested to the Planning for Employment 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):

Policy EMP2 - sportscotland supports the direction of paragraph 90 of the SPP that development plans should promote the developed coast as focus of development requiring a coastal location or which contributes to economic regeneration or well-being of local communities. Such development also includes tourism and recreation proposals. sportscotland also supports the advice of paragraph 251 of the SPP that development plans should outline the issues to be considered when assessing aquaculture proposals, and one of these is interaction with other users of the marine environment, including recreational and leisure activities. The main conflicts are likely to relate to navigation and sharing of recreational space, but safety issues may also exist. It is not clear from the current wording that leisure and recreational uses are safeguarded by policy EMP2.

3a Tourism - What modifications do you wish to see made to the Tourism 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 Tourism 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:

SECF1 Safeguarded Education and Community Facilities - No modifications; comments only

CF1 Provision of New Sports Pitches and Changing Accommodation

Modification 1. Include reference within the supporting text to PROPCF1 (page 80) and the Supplementary Guidance (SG) to the requirement for compensatory replacement where development proposals will impact on outdoor sports facilities - as detailed in SPP and separate to developer contributions.

Modification 2. Amend all references to "Sports Pitches and Changing Accommodation" to read "Sports Facilities, Pitches and Changing Accommodation".

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) :

SECF1 Safeguarded Education and Community Facilities - sportscotland generally supports this policy which would also apply to safeguard community sports facilities. We support the intent to make best use of existing facilities, as well as shared use, and that contributions/proposals should focus on increasing capacity of the most appropriately located sites. It is assumed that sites afforded protection by SECF1 are intended to be retained in that specific community use i.e. that one type of community facility could not be interchanged for another - such as a sports pitch built out for a school. We would highlight that the provisions of SPP would also continue to apply in such instances.

CF1 Provision of New Sports Pitches and Changing Accommodation

New development is likely to result in the requirement for new sports facilities or upgrade to existing facilities in order to enable them to accommodate additional users, and sportscotland supports that ELC's LDP (through policy PROPCF1) and Supplementary Guidance (SG) Developer Contributions Framework makes some provision for this. We advise that sports facilities needs should be defined through an assessment of existing sports facilities and what the future sports needs will be. It is not currently clear how the sports facilities projects proposed have been identified. It is assumed this has been informed by discussions with sports development colleagues and the leisure trust. The Draft Developer Contributions Framework (technical appendix to the SG) refers to sportscotland

guidance on the preparation of sports pitch strategies. ELC's Sports Pitches Strategy was completed in 2007 - sportscotland would encourage and support the Council in updating/reviewing this work. We would suggest that the findings of any Sports Facilities Strategy work that East Lothian undertake should be used to form an evidence base for planning obligations in relation to sports facilities.

Whilst dated, the 2007 Pitches Strategy refers to a number of pitches and pavilions that require upgrades as well as potential future pitch demand. It is assumed these recommendations have been taken into consideration for the relevant contributions areas as some of these relate to pitch upgrades. It appears the contribution proposals relate predominantly to football pitches, sportscotland recommend that consideration is given to other sports where relevant (e.g. rugby, hockey etc) if this has not already informed the LDP – for example, the Pitches Strategy referred to the need for upgraded tennis courts throughout the LA and particularly in the Tranent area where a deficit was identified.

The SG states that costs are derived from a number of sources including sportscotland 2012 guidance as well as recent pitch construction projects in East Lothian. It is unclear how the detail of costs have or would be derived for other sports facilities i.e. halls, pools, etc. sportscotland has developed the Sports Facility Calculator (SFC) - a tool which helps estimate the demand for the following sports facilities, based on a given population: sports halls; swimming pools and full size synthetic pitches (and their pavilions). The estimated demand for these facilities is based on a range of survey information from Scotland and England. The population figure used then has the age and gender profile at Council level applied to it. The costs used in the SFC are from BCIS (projected to Q4 2016) for sports halls, swimming pools and pavilions. The costs for synthetic pitches are based on a range of actual costs for pitches for the period 2012-14. It is important to note that there is no spatial dimension to this nor does it take account of the existing supply of sports facilities. We would be happy to provide further information on the SFC or facilities costings to inform contributions work.

It is appreciated that the detail of some contributions will be determined at the time of development proposals coming forward. Rather than modifications, it is intended these comments will be helpful in moving forward with the detail of requirements. Any clarification on the points raised in relation to policy PROPCF1 and the SG is appreciated.

Modification 1. sportscotland is a statutory consultee in certain circumstances (namely where proposals may result in the loss of outdoor sports facilities; or prejudice the use of an outdoor sports facility; or prevent the use of land which was last used as an outdoor sports facility, from being used again for that purpose).

Where outdoor facilities are to be lost due to development proposals, sportscotland seeks to apply the provisions of SPP paragraph 226, namely, "the outdoor sports facility which would be lost would be replaced either by a new facility of comparable or greater benefit for sport in a location that is convenient for users, or by the upgrading of an existing outdoor sports facility to provide a facility of better quality on the same site or at another location that is convenient for users and maintains or improves the overall playing capacity in the area."

In such instances, the delivery of the replacement facilities will often be secured by way of a Section 69 payment (although other mechanisms may be used). The rationale for monies paid in such cases comes from SPP paragraph 226. This requirement does not always seem to have been picked up by developers – they may be aware of developer contribution requirements (such as those covered by your Policy/SG), but not of this requirement to replace outdoor sports facilities (subject to the other caveats of SPP). To confirm, the requirement to replace outdoor sports facilities is in addition to any developer contribution requirements. Whilst this has clear backing from SPP, given that it is not always picked up by developers, it may help if this is clarified somewhere in the LDP the SG.

Modification 2. The SG initially refers to the requirement for contributions for "Sport Facilities Capacity, including formal indoor and outdoor recreation and changing facilities" (p6). LDP policy PROPCF1 and the SG specify that contributions within the relevant local zones are for "Sports Pitches and Changing Accommodation". We would have concerns that the latter wording is prohibitive to any potential demand generated for other types of facilities including indoor facilities e.g. pools, halls, tennis courts etc. The LDP policy and SG refer to the need for contributions for indoor facilities in relation to the Blindwells development site. The desire to co-locate community facilities at schools sites is noted, and welcomed, however it is unclear if and how the sports facilities and associated costs have been accounted for at these sites. The suggested wording would provide clarity and flexibility in relation to future demand for a broader scope of facilities if needed.

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:

Policy OS1: Protection of Open Space - modification to text as below:

Recreational, leisure and amenity open space and facilities, including outdoor sports facilities will be safeguarded to meet the recreational needs of the community and protect the amenity or landscape setting of an area. Alternative uses will only be considered where there is no significant loss of amenity or impact on the landscape setting and:

- i. the loss of a part of the land would not affect its recreational, amenity or landscape function, or
- ii. alternative provision of equal community benefit and accessibility would be made available, or
- iii. provision is clearly in excess of existing and predicted requirements.

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):

Policy OS1: Protection of Open Space - SPP states that LDPs should identify and safeguard outdoor sports facilities and open space, and enhance existing and promote new green infrastructure. Policy OS1 refers only to open space and facilities which are in active use and which "make a significant contribution". sportsScotland is a statutory consultee in relation to development affecting outdoor sports facilities which includes any planning application for development that is likely to "prevent the use of land, which was last used as an outdoor sports facility, from being used again for that purpose" (Dev. Management Regs. 2013). As currently worded, policy OS1 does not reflect the broader level of protection and positive policy framework advocated by SPP to these spaces - the suggested modification to policy wording is therefore requested.

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:

Proposals Map 5 Aberlady shows that the village bowling green and grass pitch are covered by LDP Policy OS1. The area of Craigiellaw Golf Course which is included in this proposals map is covered by policy DC8 and not OS1. We have noted concerns with the wording of policy OS1 in our response to the LDP Written Statement - however recognise that the policy in its existing format affords some degree of protection to these outdoor sports facilities. In relation to the golf course, whilst not allocated as OS1, sportsScotland would note that SPP provisions which seek to safeguard sports facilities would also apply.

Proposals Map 9 Dirleton shows an area of Archerfield Links Golf Course covered by policy TOUR1 as part of the wider estate. The policy supports the principle of hotel and leisure development on the estate. It states that infill housing will not be allowed. Whilst the existing golf facilities are clearly an important part of the hotel and leisure resort offer, we would highlight that SPP provisions seek to safeguard such sports facilities from development - any further or future development of the estate should take this into account.

Proposals Map 11 Dunbar The harbour area is allocated as EMP2 which states that the Council will give preference to fishing or other industry uses related to the harbour. We have noted concerns with the wording of policy EMP2 in our response to the LDP Written Statement - sportsScotland would seek that access for recreational purposes is safeguarded.

Proposals Map 14 Elphinstone The full-size grass pitch to the west of the village centre is not allocated as open space under policy OS1. For consistency with other sites/proposals maps it is requested that this designation is applied.

Proposals Map 26 Musselburgh There is inconsistent designation of golf courses with Musselburgh Golf Course being designated under policy OS1 whilst Royal Musselburgh Golf Course is not designated. We would note that SPP provisions do not differentiate between public and private facilities and suggest a consistent approach may be more appropriate. The harbour area is allocated as EMP2 which states that the Council will give preference to fishing or other industry uses related to the harbour. We have noted concerns with the wording of policy EMP2 in our response to the LDP Written Statement - sportsScotland would seek that access for recreational purposes is safeguarded.

Proposals Map 28 North Berwick There is inconsistent designation of golf courses with North Berwick Golf Course and Glen Golf Course being only partially designated under policy OS1. We would note that SPP provisions do not differentiate between public and private facilities and suggest a consistent approach may be more appropriate. The harbour area is allocated as EMP2 which states that the Council will give preference to fishing or other industry uses related to the harbour. We have noted concerns with the wording of policy EMP2 in our response to the LDP Written Statement - sportsScotland would seek that access for recreational purposes is safeguarded.

Proposals Map 32 Prestonpans, Port Seton & Cockenzie There is no designation on the Meadowhill Sports Centre and associated grounds to the south of these settlements. This is inconsistent with the approach to other outdoor facilities (i.e. pitches) and we would recommend policy OS1 designation is applied particularly due to the site's importance as a local multi-pitch multi-sport facility for the local settlements. We would note that SPP provisions do not differentiate between public and private facilities and suggest a consistent approach may be more appropriate. The harbour areas at Port Seton and Cockenzie are allocated as EMP2 which states that the Council will give preference to fishing or other industry uses related to the harbour. We have noted concerns with the wording of policy EMP2 in our response to the LDP Written Statement - sportsScotland would seek that access for recreational purposes is safeguarded.

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) :

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Visual Upload:

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Visual Upload:

No file was uploaded

Response ID ANON-ZMS3-3MZ4-USubmitted to **East Lothian Proposed Local Development Plan**Submitted on **2016-10-29 11:53:29****About You****1 What is your name?****First name:**

Barry

Surname:

Turner

2 What is your email address?**Email address:****3 Postal Address****Address:**

5 Carberry Close

Inveresk

4 Please enter your postcode**Postcode:**

EH21 8PP

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

Local Interest Group

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

Musselburgh Conservation Society

Your role:

Committee member

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:**Section 1 - Introduction (pages 1-10)****1a Introduction - what modifications do you wish to see made to the Introduction of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.****Modification(s) sought::****1b Please give any information/reasons in support of each modification suggested to the Introduction of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.****Justification for Modification(s):****Section 2 - A Spatial Strategy for East Lothian (pages 11-14)****1a A Spatial Strategy for East Lothian - what modifications do you wish to see made to this section of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.****Modifications(s) sought:**

We object to the overall spatial strategy as currently expressed in paragraphs 2.1 to 2.13 of the plan. We wish amendments to be made to properly reflect the issues and constraints that we outline below in respect of over-concentration in Musselburgh and including a consequential reference to an approach to dwelling

numbers proposed there.

We are not however proposing abandoning the plan and switching to a dispersed strategy. This is because we are concerned about the impact of further delay and the prospect of development proposals coming forward on inappropriate sites and being supported on appeal if a five year supply of effective housing land is lacking. We are seeking a damage limitation, call it a hybrid, approach with an emphasis on the west that does not flood Musselburgh with development in a form which would make it unattractive to residents and investors alike and unable to meet the plan's objectives. We therefore propose a reduction in the housing allocation to the Musselburgh cluster of 1000 dwellings which is based partly upon not replacing the numbers lost when Goshen Farm was removed from the Plan. It would also represent a gesture to the people of Musselburgh who are faced with an unrealistic and damaging level of expansion which may well prove to be undeliverable.

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

Justification for Modification(s):

The Society takes the view that the compact growth strategy as set out in the plan's broad strategy for East Lothian (paragraphs 2.3 to 2.6 on page 11) is fundamentally flawed in respect of the impact that it would have on Musselburgh. 5300 new homes represents something like a 50% increase in the population. Our argument is as follows:

(1) Musselburgh is a special place with a clear physical and cultural identity reflected in a strong community spirit and the way that people see and enjoy their town. The plan does not seem to recognize this. The dwelling numbers proposed represent a massive and damaging change to the shape, nature and identity of the town, exacerbated by major developments proposed nearby in Edinburgh and Midlothian. This in our view runs contrary to the provisions of national policy. National Planning Framework 3 wants to see growth which respects the quality of environment, place and life. SPP also puts emphasis on placemaking but the strategy appears to fly in the face of the kind of development and the kind of places that SPP seeks to create. The current Single Outcome Agreement in its point No.1 refers to new development reflecting the distinctive identity of towns. The strategy even runs counter to one of the objectives and outcomes of the proposed plan itself (paragraph 1.61) where a bullet point reads 'To ensure that new development reflects the character, appearance and amenity of the area, including its settlements and their settings'. For Musselburgh the compact growth strategy, through saturation, shows no respect whatsoever for these things. We totally reject the implication that the character and identity of Musselburgh are expendable in the interests of meeting housing need.

(2) Musselburgh does not have the capacity or infrastructure to support such an expansion and we see little or no prospect of realistic improvement to cater for numbers on this scale. Taking traffic issues specifically, Musselburgh has particular movement constraints due to the limited river crossings channelling traffic into the High Street. The enormous impact of all the additional traffic generated by compact growth on the town centre and an already heavily congested and seriously polluted Musselburgh High Street casts serious doubts upon the arguments for and alleged advantages of concentration. The High Street is the town's heart and we should be finding ways to make it a safer and a more pleasant place for people rather than funneling more traffic into it. Given the constraints it is our view that it will not be possible to satisfy the provisions of Policy T2 and that the mitigation measures contained in Policies T19 and T21 will represent little more than tinkering and will be ineffectual. Add to this we fail to see how an overcrowded and congestion-riddled town will help grow the economy which is another of the plan's objectives. It is more likely to put investors off as the attractions of the location are eroded.

(3) Accessibility in the west of East Lothian, a consideration at the centre of the compact growth concept, is grossly overstated and assumptions made belie the facts. In Musselburgh's case proximity to Edinburgh does not equate to accessibility. The local train service is poor and in the peaks overcrowded to the extreme. Promised longer trains will only take up latent demand and that created by the many proposed developments further east. Running more trains does not appear to be a possibility without rail capacity improvements for which there is no commitment. The other misapprehension here is about how good the bus services serving Musselburgh are. Certainly there are plenty of buses but they are for the most part slow, delayed by congestion and do not serve the main concentrations of employment beyond the city centre. Overall, transport accessibility for journeys into Edinburgh is in fact better from locations further east in the county where people can actually get on a train or use an express bus which does not have to negotiate Musselburgh High Street.

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:

Remove proposals MH13 and MH15.

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 justification under specific site references.

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:

We object to the omission of a spatial strategy or vision for Musselburgh in paragraphs 2.14 to 2.21 and propose that the following be incorporated:

' Given the scale of development proposed in the Musselburgh cluster and its likely impact it should be provided in accordance with a spatial strategy for the area

which is based upon what physically gives the town its identity and character now and makes it an attractive place to live and do business, what's good and should be preserved and protected and where development should go to cause least damage. It is about getting the right amount of development in the right places whilst protecting acknowledged assets, in other words maintaining a sense of place.

To achieve these aims the strategy proposes protecting four major open areas which give the town breathing space, provide separation from adjoining communities and bring the countryside into the town. They are:

- (i) To the west Newhailes Park and, outwith East Lothian, the adjacent Brunstane area which together give separation between Musselburgh and Edinburgh. Unfortunately it looks like the Brunstane area is to be developed as part of the Edinburgh Local Plan leaving only Newhailes parkland as open land here.
- (ii) The open lung to the west of the river Esk from south of the A1 through Monktonhall Golf Course and The Haugh to Olive Bank bridge.
- (iii) The major open lung east of the river from Carberry across Howe Mire, including land north of Whitecraig, into Inveresk and Lewisvale Park, incorporating the strip of land north of Wallyford station which separates Whitecraig from Musselburgh and provides a link with area (iv). This area is of special importance because it contains much of the historic Pinkie Cleugh battlefield site and gives Inveresk Village Conservation Area its separate identity.
- (iv) The north east coastal strip from Levenhall Links through to Royal Musselburgh Golf Course including the Goshen Farm and Drummohr areas which provide an undeveloped buffer to the adjoining nature conservation area. Overall the area provides separation from Prestonpans, maintains the undeveloped waterfront, protects the designed landscape of Drummohr House and contains another key area of the battlefield site.

Unless there is a persuasive case for limited development which causes no harm, and Whitecraig South and Levenhall are examples, and allowing for extant planning permissions, these areas will be protected by maintaining Green Belt status and introducing new protected open land status where necessary. Musselburgh would thus remain recognisable and retain its identity long term, and there should be no decisions now that would compromise this structure, including allowing minor developments which would threaten the integrity of the open areas. Where major development should be focussed is to the far side of existing built up areas (a) up to the A1 to the south east of the town. i.e. the Wallyford development now underway, and (b) south west of the town around QMU and Craighall where generated traffic can be directed onto upgraded A1 junctions and away from the town centre'.

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):

In putting specific proposals together which will achieve a reduction of 1000 dwellings there we see a need for a logical, sensible and systematic spatial strategy for Musselburgh which should be a vision for the long term structure and physical identity of the town. Such a vision is lacking from paragraphs 2.14 to 2.21 of the proposed plan and so it is difficult to understand the logic behind the allocations.

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:

We object to the proposed allocation at Craighall (Proposal MH1) which should be reduced by 430 dwellings as a preferred contribution to the reduction of 1000 dwellings from the Musselburgh cluster.

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):

Whilst supporting Craighall as a preferred location for development we note that the MIR allocation here was 700 dwellings with potential for more. We take the view that 1,070 is a more acceptable and realistic figure than 1500, with a reduction in the amount of residential development south of the A1 which would be relatively isolated from other housing and more remote from Musselburgh. A greater employment allocation might be possible here.

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:

We object to the proposed allocation at Dolphingstone South (MH10) which should be reduced by 200 dwellings as a preferred contribution to the reduction of 1000 dwellings in the Musse burgh cluster

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):

Whilst supporting the Wallyford expansion now underway we have reservations about the acceptability of extending the development site further east and away from the existing settlement. However we understand that such an extension is apparently needed to create a critical mass for the new secondary school and in any case the land has already been despoiled in preparation for development. The MIR allocation here was 400 and we see this as a more acceptable figure which would help obviate the need for any higher density development on the Haddington Road frontage as indicated in the draft development brief. In our view the relatively remote location would not be suitable for higher density development and would be more suited to employment uses compatible with those on the opposite side of the road. The employment allocation that would be lost from Howe Mire could be relocated here.

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:

We object strongly to the inclusion of Proposal MH13, land at Howe Mire (170 dwellings). It should be removed from the allocations and such removal would also be a preferred contribution to the reduction of 1000 dwellings in the Musse burgh cluster.

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):

This is a totally unacceptable development site regardless of any consideration of numbers. It lies at the heart of the site of the Battle of Pinkie Cleugh which is of national significance. In fact it abuts and would seriously affect views across the battle site from the battle memorial stone. Add to this, evidence suggests that there are burials associated with the battle beneath the land proposed to be developed. No mitigation would be possible to counter its impact and tentative proposals by a consortium of local organisations to establish a battlefield heritage centre nearby would be compromised. It also lies within the major open lung east of the river Esk referred to in our vision statement. If developed the new Green Belt boundary to its west and north would be an indefensible one opening up to development a whole swath of land which apart from the battlefield significance is vitally important in terms of Musselburgh's and particularly Inveresk's identity and character. The impact of this would be disastrous. The reporter at the Barbachlaw inquiry referred to the need for a robust long term boundary to the Green Belt adjacent to that development and also stated that unnecessary encroachment into the residual core landscape of the battle would be undesirable. Nothing has changed apart from the fact that the proposed plan contains a specific battlefields policy (Policy CH5) the provisions of which the development will certainly not satisfy. The Main Issues Report (MIR) which rejected this as a preferred site referred to it as having more significant landscape and cultural heritage impacts than other sites. Though obviously inferior and involving the loss of class 1 agricultural land it has now been included because Goshen was dropped and also presumably to make up the numbers required by the more than adequate generosity allowance. In addition to all the above flaws it represents an unnecessary further development of Wallyford which must cast doubt about its marketability. It quite obviously should not have been included.

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:

We object to the inclusion of Proposal MH15, land at Whitecraig North (200 dwellings) and its removal is a preferred contribution to the reduction of 1000 dwellings in the Musse burgh cluster.

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):

This site encroaches unacceptably into the open lung already referred to in our vision statement for Musse burgh and it would give rise to a new indefensible Green Belt boundary which we maintain would make development right up to the A1 inevitable. This in turn would make development on the Musselburgh side of the A1 more likely meaning the loss of much of this key open area of land. It seems to us as extremely unwise to propose development on Green Belt land which serves the specific purpose of avoiding coalescence and maintaining structural identity. The MIR, in rejecting it as a preferred site, recognised its deficiencies in respect of maintaining a defensible Green Belt boundary and stated that it would not represent as logical an expansion of Whitecraig as the preferred site to the south. We would go further and claim that it would represent an over development of Whitecraig whilst making no contribution to the settlement. Again this appears to be a site included purely for expediency, and like Howe Mire it involves the unnecessary loss of class 1 agricultural land. We also have serious concerns about development here channeling traffic into Inveresk Village. The road through Inveresk is not suited to this purpose on account of its residential nature and the number of vulnerable historic buildings, plus unsatisfactory junction arrangements in Musselburgh.

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:

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):

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 3 - Town Centres, Employment and Tourism (pages 57 - 63)

1a General Urban Development Policies - What modifications do you wish to see made to this 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 General Urban Development Policies 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 Planning for Employment - What modifications do you wish to see made to the Planning for Employment 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:

Remove Proposal MH13 from the list of sites in Table EMP1 and include the displaced employment allocation (1ha) as a new allocation for Proposal MH10.

2b Please give any information/reasons in support of each modification suggested to the Planning for Employment 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 justification under relevant sites in Section 2.

3a Tourism - What modifications do you wish to see made to the Tourism 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 Tourism 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 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:

- (i) In Table HOU1 amend the allocations to reflect the changes contained in Section 2.
- (ii) In Table HOU1 accommodate increased allocations at appropriate sites following an assessment of suitability so as to make provision for 250 of the 1000 dwellings displaced from the Musse burgh cluster.
- (iii) In Table HOU2 reduce the figure for contributions from new allocations by 750.
- (iv) In Table HOU2 add 300 to the the figure for contribution from future windfall sites.
- (v) In Table HOU2 reduce to 18.5% the percentage generosity in land supply to 2024 representing 450 fewer new dwellings being needed overall.

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):

(i) The justification is set out in Section 2 under specific sites.

(ii), (iii), (iv) and (v)

We have identified how we think the reduction of 1000 dwellings in the Musse burgh cluster could be compensated for in order to maintain overall numbers across the county but without proposing new allocations which themselves would add to unwanted delay.

We propose that this be done as follows or by some other numerical combination between the three headings:

- 300 by a greater allowance for windfalls, i.e. unpredicted development, including developments in the countryside and enabling development, plus the bringing back into use of long term vacant units, notably above shops in town centres. Bearing in mind possible significant development proposals that are known about such as at East Fortune Hospital and the housing element at Kirk Park, Musselburgh, and the likely presentation of other proposals based upon recent experience we believe that the windfall estimates contained in Table HOU2 are unrealistically low.
- 250 by an increase in the allocations proposed in villages and small settlements with a school and regular bus service. 250 represents an average of 25 in ten locations achieved through higher density which will facilitate more much-needed socially rented rural housing as well as supporting local facilities which we often hear from residents are under threat. It would help redress the balance between east and west without identifying new locations for development. Our point that it will be easier and more attractive to use trains from stations further east along the East Coast main Line has a bearing here.
- 450 by reducing the generosity allowance by a few percentage points. This would mean sites for 450 homes would not need to be found, notably the inferior sites at Howe Mire and Whitecraig North. The whole concept of generosity is worrying to us and could well lead to over provision and development on less sustainable sites. We think the plan is being over-generous.

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:

There should be a phasing policy for the release of sites contained within this section of the Plan so that priority is given to the larger strategic sites which bring specific benefits.

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):

It is concerning to us that a 23% generosity factor is being built into the allocations. This seems to involve adding in a number of small and arguably less appropriate sites to make up the numbers, but this flies in the face of a strategy focusing on the benefits and economies of scale of large sites. Notwithstanding what we say about increasing numbers in some small settlement allocations, the worry is that there will be allocated poor sites that will be attractive to developers because they will be easy to develop due to the lack of major and expensive infrastructure needs. They will be picked off to the detriment of the larger sites that bring a range of benefits. To avoid this and ensure no over provision, a phasing mechanism will need to be built into the plan so that smaller sites are not released prematurely and that their release is related to the progress of delivery on the strategic sites. This would involve differentiating between allocated sites in terms of their priority and release, and an additional housing policy would be needed to reflect this because guidance or advice may be insufficient.

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:

The plan needs to be much more specific in paragraphs 3.115 and 3.116 about how primary care provision for a huge increase in population is to be met, particularly in the Musselburgh cluster . Reference is sparse and lacks reassurance that adequate facilities will be put in place.

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):

At a time when existing residents are finding it very difficult to obtain doctor appointments and incomers are often unable to get registered with a GP, the plan needs to allay fears that the situation will become intolerable with thousands of new homes being built. Health care is a fundamental need which should be a paramount consideration of the plan. The fact that in the Musselburgh section of the Action Programme document (Appendix 2b) there is not a single entry under NHS Lothian sends a worrying message because action is most certainly needed and recorded there, even if it might be based around revenue proposals. The Musselburgh Health Centre will certainly not be able to cope even with a few more GPs and new facilities will be needed at Craighall and Wallyford.

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

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

Modifications(s) Sought:

We support the modifications to Policy T8 put forward by RELBUS

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) :

Provision must be made to enable buses to adequately serve new developments if we are to get new residents to use public transport.

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):

Section 8 - Delivery (pages 142 - 144)

1a Delivery - What modifications do you wish to see made to the Delivery 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:

There should be a more emphatic statement in this section that development will not be allowed to go ahead on individual sites without all the infrastructure required to support it being in place.

1b Please give any information/reasons in support of each modification suggested to the Delivery 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):

It would be unacceptable to impose on any community a scale of development that would be environmentally damaging and/or unsustainable because of a lack of necessary infrastructure. This is a key element of our objections relating to Musselburgh. Notwithstanding all the work done and related documents produced we have grave doubts, whatever strategy is adopted, about the ability to put in place all the necessary infrastructure improvements needed to support the numbers of dwellings proposed. There is no point in implementing an unrealistic or unsustainable plan. It is paramount that we do not allow development to proceed without the necessary infrastructure being in place and the plan needs to be emphatic about this. We would argue that if key development proposals become undeliverable because of failure to provide infrastructure then an approach has to be made to SESplan seeking a review of the Strategic Development Plan and a redistribution of allocations between authorities.

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

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

Modifications(s) Sought:

The Proposed Craighall Primary Education Contribution Zone should be extended eastwards to the A720 and incorporate that part of the Campie Zone south of the railway line. The Whitecraig Primary Zone should omit land to the west of the A720 and the Campie Primary Zone should omit the strip south of the railway line.

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

Justification for Modification(s):

It is impossible to reach Whitecraig Primary School from the Craighall area except by car or school bus using the A1 and this is unacceptable. We should be planning primary school provision so that children can safely walk or cycle to school. We should also be promoting community cohesion in development areas by having all primary age children in one neighborhood attending the same school, including those already resident. Current catchment areas for both Whitecraig and Campie Primary Schools would be divisive.

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:

Remove Howe Mire development site from the Musse burgh Inset Map (Map 26).

Remove Whitecraig North development site (MH15) from the Whitecraig Inset map (Map 37).

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) :

Justification is set out in Section 2 under the appropriate site headings.

Visual Upload:

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Visual Upload:

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Additional Comments

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:

1. Possibly the most crucial piece of infrastructure required in order to make all the development proposed across East Lothian sustainable in transport terms is that which will increase capacity on the East Coast Main Line and enable more local trains to be run (Proposal T13). And yet no reference is made to this in expected developer contributions (Appendix 3a). It is further development that will make this proposal absolutely necessary. We do not understand why developers will not be contributing something towards its considerable cost.

2. Since it was raised in the MIR we are surprised that no mention is now made of joint education provision with Midlothian Council in respect of the Craighall area (Policy ED1 on page 75).

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

Justification for Modification(s):

1. A prime reason for East Lothian being cited as a preferred location for new housing in the Strategic Development Plan is its supposed access bility, but the rail service is grossly inadequate and new residents, especially in the west of the county, will be unable to use it because of acute overcrowding unless there is increased track capacity. People will have no alternative but to use cars, adding to already unacceptable congestion levels.

2. This would make sense in accessibility terms and take pressure off Musse burgh Grammar School.

File upload:

No file was uploaded

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-10-30 16:19:19**

About You

1 What is your name?

First name:

Alan

Surname:

Lindsey

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 resident/member of the public

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

Organisation:

Your role:

Concerned Resident

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

Section 2c- Introduction to Blindwells Cluster (pg 28)

1a Introduction to the Blindwells Cluster - What modifications do you wish to see made to the introduction of the Blindwells Cluster? 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:

Recognition that the Blindwells site is not non-viable and that it is quite possible using recognized measures to develop it economically and in a structurally sound way.

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

Justification for Modification(s) :

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

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

Modifications(s) Sought:

I FOUND YOUR WEBSITE IMPENETRABLE AND CANNOT REFERENCE PAGE NUMBERS.

- 1) I request that the SALTCOATS (NK7), FENTON GAIT EAST (NK8), and FENTON GAIT SOUTH (NK9) be removed from the proposed LPD as housing sites.
- 2) All forms of Access are problematic-Public transport, private cars and delivery vehicles, pedestrian access (the plan states 1600 mts is access ble for shops etc -No pensioners then no children, no mobility stressed persons then? Ridiculous!)
- 2) The stress on services-public transport, schools health, shops, and the poorly maintained roads will be unbearable and unsustainable if all three sites are developed.
- 3)Development on this scale will ruin the amenity of a village which the Local Authority purports to wish to promote as a tourist, holiday and golfing destination.
- 4)The site also comprise prime agricultural land. A CALA Housing Farm is not what we want and nor should the Council.
- 5) Gullane will not be free of disruption from development disturbance for a decade. Who will wish to live or visit an area where roads are constantly being closed to provide access of services to building sites?
- 6) If the Council wishes to attain its ill considered agreement to 10000 houses, it should ensure brownfield sites are developed first, including the fire school site at Gullane and IN PARTICULAR the Blindwells site at Tranent.

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

Justification for Modification(s):

See above: Your downloaded local plan is impenetrable and I have been unable on my computer to sort out which part of the plan relates to which items about which I am concerned. As a reasonably computer literate elderly pensioner, I think this is to be regretted. I hope you will nevertheless distill my reasons for the modifications I am suggesting by perusal of the comprehensive discourse above

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-10-30 16:41:20**

About You

1 What is your name?

First name:

Lawrie

Surname:

Main

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.....?

Developer/ agent/ landowner

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

Organisation:

Your role:

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

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

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

I object to the following terms and content of the Proposed Local Development Plan:

- (1) inclusion of the allocation of a new site for housing development at Castlemains Place, Dirleton (PROP NK11 Castlemains Dirleton)
- (2) failure to designate that site (Castlemains Place, Dirleton) for inclusion within the Countryside Around Towns policy- this land should remain outwith the Dirleton settlement boundary
- (3) failure to designate the site at Foreshot Terrace Dirleton (ALT-N3) as an allocation for housing development included within the LDP
- (4) designation of the said site for inclusion within the Countryside Around Towns policy- this land should be defined as lying within the Dirleton settlement boundary

And I propose the following amendments to the Proposed LDP :

- Removal of the Castlemains Place site from the LDP as an allocated site for housing development and designation of that site for inclusion within the CAT policy
- Inclusion of the Foreshot Terrace site within the LDP as an allocated site for housing and removal of its designation for inclusion within the CAT policy

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):

Reasons in brief:

By its inclusion of an allocation for housing by ELC there is an acceptance that Dirleton can accommodate some new housing. Consultation responses to the Main Issues Report suggest there is also some acceptance locally that some development within the village may be acceptable.

ELC planners have misdirected themselves in their selection of the Castlemains Place site in preference to the Foreshot Terrace site. Development on the former poses significant risk of harm to the character of the Dirleton Conservation Area and ELC has failed to give proper weight to the comments and views of Scottish Natural Heritage and Historic Scotland in its decision to propose that site for development. The constrained nature of the development brief produced by ELC with input from SNH serves to further reinforce the difficulty of trying to ameliorate the potential for adverse impacts arising from development, on the setting of Dirleton Castle which is at the core of the Dirleton Conservation Area.

The site at Foreshot Terrace is discreet and relatively self-contained, has a committed developer and plans for development have been produced which demonstrate that housing development could be situated there with significantly less risk of harm to the characteristics of the Conservation Area than if development were placed at the Castlemains Place site.

For these, reasons I move the amendments to the Proposed Local Development Plan as stated.

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) :

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 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):

Section 6a - Our Natural Heritage (pages 125-132)

1a Biodiversity and Geodiversity - What modifications do you wish to see made to the Biodiversity and Geodiversity 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 Biodiversity and Geodiversity 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 Soil Quality - What modifications do you wish to see made to the Soil Quality 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 Soil Quality 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 Trees and Woodland - What modifications do you wish to see made to the Trees and Woodland 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 Trees and Woodland 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 Protecting and Enhancing the Water Environment - What modifications do you wish to see made to the Water Environment 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 Water Environment 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 Sustainable Drainage Systems (SuDs) - What modifications do you wish to see made to the SuDs 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 Sustainable Drainage Systems (SuDS) 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 Flood Risk - What modifications do you wish to see made to the Flood Risk 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 Flood Risk 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 Air Quality - What modifications do you wish to see made to the Air Quality 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 Air Quality 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 Noise - What modifications do you wish to see made to the Noise 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 Noise 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 6b - Our Cultural Heritage (pages 133-136)

1a Development Affecting Listed Buildings - What modifications do you wish to see made to Affecting Listed Buildings 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 Development Affecting Listed 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) :

2a Development Affecting Conservation Areas - What modifications do you wish to see made to the Development Affecting Conservation 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:

2b Please give any information/reasons in support of each modification suggested to the Development Affecting Conservation 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):

3a Development Affecting Scheduled Monuments and Archaeological Sites - What modifications do you wish to see made to the Development Affecting Scheduled Monuments and Archaeological 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:

3b Please give any information/reasons in support of each modification suggested to the Development Affecting Scheduled Monuments and Archaeological 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):

4a Development Affecting Gardens and Designed Landscapes - What modifications do you wish to see made to the Development Affecting Gardens and Designed Landscapes 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 Development Affecting Gardens and Designed Landscapes 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 Area Based Cultural Heritage Policies - What modifications do you wish to see made to the Area Based Cultural Heritage Policies 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 Area Based Cultural Heritage Policies 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):

Response ID ANON-ZMS3-3MJD-U

Submitted to **East Lothian Proposed Local Development Plan**
 Submitted on **2016-10-31 09:33:36**

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

Ross

Surname:

Glanville

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 resident/member of the public

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

02a(ii) Inset Map 32: Prestonpans, Port Seton and Cockenzie

I wish to see adjustments made to the proposed areas set out for industrial use around the Cockenzie Power station site and the areas around the coal store. I would like to see any development restricted to within the original footprint of the power station and associated land.

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):

02a(ii) Inset Map 32: Prestonpans, Port Seton and Cockenzie

My reasons for wishing for development to be restricted to the original industrial footprint:

The overall impact on the local area primarily residents living right next to the current green spaces where proposals have been made to expand out with the original industrial areas.

I would like the area to be available for community use, it is also part of the remaining battle site of the battle of Prestonpans. There is a community orchard that is situated on land gifted to the community by Scottish Power some years ago. This is like giving with one hand and snatching back with the other.

There are ample opportunities to "Think Big" for the community to decide on. Training opportunities, recreational use and educational use on this land if it is utilised properly. Development on this land that was never used for industry before will destroy any opportunity to use this in future as a community space.

We've embraced the power station for all these years and nobody is against industry within the area but we are against having more land snatched away when there is opportunity to develop on current industrial areas here.

Communities need a sense of place and well-being. Over development on this land will compromise this and take away from part of the enjoyment of living in the part of East Lothian.

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

1a What modifications do you wish to see made to the Strategy map for the Prestonpans/Cockenzie/Port Seton/Longniddry Cluster? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question. Do you have any comments to make on the

Modifications(s) Sought :

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

Justification for Modification(s) :

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-10-31 14:10:10**

About You

1 What is your name?

First name:

David

Surname:

Queripel

2 What is your email address?

Email address:

3 Postal Address

Address:

Eden Park House

Cupar

4 Please enter your postcode

Postcode:

KY15 4HS

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

Other

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

Organisation:

Montgomery Forgan Associates

Your role:

Planning Consultant representing Meadowhead Ltd

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

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:

Paragraph 5.20 First Sentence:

Should be expanded to clarify that certain appropriate and justified development can be supported in principle, for example, a rural business, tourism or leisure related use such as the expansion of an existing holiday caravan park within a Countryside Around Towns area.

Policy DC8: Countryside Around Towns:

The area to the east of Tantallon Caravan Park should be excluded from the Countryside Around Towns designation.

Policy DC9: Special Landscape Areas:

Amend 2 to read, "... the public or economic benefits...."

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):

Paragraph 5.20 First Sentence:

It is important that appropriate and justified development within a Countryside Around Towns area is supported in principle, and this support is explicit within the text associated with Policy DC8.

Policy DC8: Countryside Around Towns:

The area to the east of Tantallon Caravan Park comprises of an agricultural field. It is bounded to the west by Tantallon Caravan Park, to the north and east by Glen Golf Course and to the south by the A198. This agricultural field should be excluded from the Countryside Around Towns area as it is the only part of the CAT area that is situated to the north of the A198.

This area is appropriate for the possible future expansion of Tantallon Caravan Park and is already within a Special Landscape Area (Policy DC9) and within a Constrained Coast (Policy DC6).

Policy DC1: Rural Diversification, adequately controls rural diversification and development in the countryside.

Policy DC9: Special Landscape Areas:

It is important to recognise that economically important development may also be appropriate within Special Landscape Areas.

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-10-31 14:15:55**

About You

1 What is your name?

First name:

SARAH

Surname:

LINDSAY

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 resident/member of the public

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

Organisation:

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::

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 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:

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):

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:

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):

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

1a What modifications do you wish to see made to the Strategy map for the Prestonpans/Cockenzie/Port Seton/Longniddry Cluster? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question. Do you have any comments to make on the

Modifications(s) Sought :

Reference EGT1 should be applied to the former Power Station Energy footprint only - not to the surrounding land, which should retain its designation as Public Open Space and Countryside.

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

Justification for Modification(s) :

The area shown on the map accompanying the Local Development Plan (inset Map 32) extends well beyond the site of the former energy footprint of Cockenzie Power Station. The majority of this land is currently designated, in the East Lothian Local Plan 2008, as Countryside (DC1) or Public Open Space (C3). The land associated with power generation extends to the areas of land covered by the main power station building, transformer building, coal plant and the coal conveyor buildings. This is the site allocated in the adopted 2008 local plan as NRG1.

The proposed changes are not a requirement of National Planning Framework 3 and appear to be seeking to extend the boundaries of the former Power Station site.

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

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

Modifications(s) Sought:

- 2.49 ELC should modify the LDP to accommodate the dispersed spatial strategy - rather than the compact strategy.
- 2.51 Port-related developments should be removed from potential developments.

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

2.49 The Preferred Approach of compact spatial strategy - concentrating development in the west of the county risks removing much of the public and amenity land for the existing communities.

2.51 Energy related uses, manufacturing, servicing and potentially port related developments are not compatible with the dense residential strategy being proposed under the Plan or with the existing rural residential nature of the area.

I would ask that ELC uphold their views at paragraphs 2.55 & 2.56 with regard to Strategic Landscape Mitigation where they state '2.55 There are areas of land outwith the green belt that are also under development pressure. These are between Prestonpans, Cockenzie, the allocated land at Blindwells and Tranent. Development in these locations would lead to the coalescence of settlements, undermine their character and setting, compromise cultural heritage assets, including battlefields, and / or lead to the loss of the best prime quality agricultural land. The combination of these environmental constraints points to a need to restrain further built development here which, individually or cumulatively, would undermine related objectives. A Countryside Around Town Designation applies to land between these neighbouring settlements. Around Town Designation, to ensure Prestonpans, Cockenzie, Tranent, Blindwells and Longniddry retain their separate identities. This will provide active travel opportunities to link communities, growth areas and places beyond them together. Opportunities for recreation and habitat creation and connection will be delivered as part of the multifunctional Green Network. 2.56 Strategic Green Network opportunities will be delivered, including within the Countryside.'

Additionally paragraph 2.57 states that 'The site of the Battle of Prestonpans is designated, as identified by the National Inventory.' Please may this remain so - and it is not designated for industrial use.

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-10-31 20:32:56**

About You

1 What is your name?

First name:

Caroline

Surname:

Edgar

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 resident/member of the public

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

Organisation:

N/A

Your role:

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

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

1a PROP BW1: Blindwells New Settlement- What modifications do you wish to see made to Prop BW1 of 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 Please give any information/reasons in support of each modification suggested to Prop BW1 of the Plan. State all relevant paragraph numbers of the proposed plan to which the modification(s) refer.

Justification for Modification(s):

2a PROP BW2: Safeguarded Blindwells Expansion Area - What modifications do you wish to see made to Prop BW2 of 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) :

Exclusion of Greendykes Farm from this safeguarded area.

2b Please give any information/reasons in support of each modification suggested to Prop BW2 of the Plan. State all relevant paragraph numbers of the proposed plan to which the modification(s) refer.

Justification for Modification(s):

This is unnecessary development of prime agricultural land, and destruction of existing farm residential community. Is in contradiction to previous DC development in countryside policy applying to this space.

3a Policy BW3: Blindwells Area Design Framework - What modifications do you wish to see made to Prop X of 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:

3b Please give any information/reasons in support of each modification suggested to Policy BW3 of the Plan. State all relevant paragraph numbers of the proposed plan to which the modification(s) refer.

Justification for Modification(s):

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-10-31 22:30:44**

About You

1 What is your name?

First name:

Amanda

Surname:

Ferguson

2 What is your email address?

Email address:

k

3 Postal Address

Address:

4 Please enter your postcode

Postcode:

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

Local resident/member of the public

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

Organisation:

Member of publi

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::

Non employment use of land behind property at old Craig hall junction south west

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):

For to air pollution, change of green belt area and height etc of proposed employment use

Response ID ANON-ZMS3-3MJB-SSubmitted to **East Lothian Proposed Local Development Plan**Submitted on **2016-11-01 15:43:27****About You****1 What is your name?****First name:**

Alexis

Surname:

Inglis

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 resident/member of the public

6 What is your organisation and role (if applicable)?**Organisation:****Your role:****7 Are you supporting the plan?**

No

If Yes: Please include your reasons for support:**Section 2d - Tranent Cluster Main Development Proposals**

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

Modifications(s) Sought:

Para 2.90 - an extra 550 homes at Windygoul is excessive and in no way can be accommodated by the current or proposed Tranent infrastructure. Traffic in the town is already a nightmare with long queues routinely seen along Edinburgh road and the High St. Although plans are included to expand Windygoul primary this would only exacerbate the already dangerous traffic situation outside the school where it's only a matter of time before a child is killed. No mention is made of the resulting capacity issues at Ross High which doesn't have the capacity to expand or the current problems at the health centre which is already oversubscribed. In addition (given that we lived in the area during the building of the current housing estates at Windygoul) I can see no way to make the air quality safe for children at Windygoul primary during construction, or later with the extra traffic.

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

Justification for Modification(s):

As above - proposal has not been properly thought through.

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

Modifications(s) Sought:

Na

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

Justification for Modification(s) :

Na

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

Modifications(s) Sought:

Na

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

Justification for Modification(s):

Na

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

Modifications(s) Sought:

Na

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

Justification for Modification(s):

Na

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

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

Justification for Modification(s):

Response ID ANON-ZMS3-3MJS-ASubmitted to **East Lothian Proposed Local Development Plan**Submitted on **2016-11-01 19:24:09****About You****1 What is your name?****First name:**

Professor Chris Clark and Mrs Joy Clark

Surname:

Clark

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 resident/member of the public

6 What is your organisation and role (if applicable)?**Organisation:****Your role:****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:

The area of land allocated for housing in Humbie, shown as proposal TT15, should be reduced from the present 1.7 ha to approximately 0.5 ha.

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):**

The Proposed LDP envisages 20 houses for Humbie on site proposal TT15. This number is excessive for the reasons detailed under response to 2(d) 15(b). Reducing the area to 0.5 ha would significantly mitigate the negative impacts of the proposed development but still provide ample space for a more proportionate expansion.

Section 2d - Tranent Cluster Main Development Proposals**1a PROP TT1: Housing at Windygoul South, Tranent - What modifications do you wish to see made to Prop TT1 of the proposed Plan?**

Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the

next question.

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

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

Justification for Modification(s):

QUESTION 15(a) PROP TT15 PROPOSED MODIFICATIONS:

[This question is answered here because no response space has been provided under 2(d) 15(a).]

In Paragraph 2.105:

The area of land allocated for housing in Humbie, shown as proposal TT15, should be reduced from the present 1.7 ha to approximately 0.5 ha.

REASONS FOR MODIFICATIONS TO PARAGRAPH 2.105

(1) The land proposed for housing is prime agricultural land. This is a locally and globally scarce and non-renewable resource. While recognising that Scottish Planning Policy provides for the allocation of prime agricultural land for housing for good strategic planning reasons, it is inappropriate for the LDP to needlessly take more prime agricultural land for housing than is strictly necessary to achieve key plan objectives.

(2) The site is inappropriate on grounds of suitability and deliverability according to the ELC Environmental Report 2016, Appendix 7, Tranent area. At pages 5-6, this document adopts a 3-point scale (positive, neutral, negative) for the assessment of housing sites under nine criteria of suitability and deliverability. The possible range of scores for a site is thus from +9 to -9. On pages 247-250, the site at TT15 receives a cumulative score of -1. This translates as negative on balance on grounds of suitability and deliverability.

(3) The site is inappropriate on environmental grounds according to the ELC Environmental Report 2016, Appendix 7, Tranent area. At pages 8-11, this document adopts a 3-point scale (positive, neutral, negative) for the assessment of housing sites under ten environmental criteria. The possible range of scores for a site is thus from +10 to -10. On pages 247-250, the site at TT15 receives a cumulative score of -2. This translates as negative on balance on environmental grounds.

(4) The allocation of 20 new houses to the village of Humbie over the time scale of the LDP, i.e. the seven years 2017-2024, is inappropriate. It is too large an allocation in comparison to the size of the village.

The main body of the the village of Humbie lies within a compact area contained within a radius of 200 metres of the front door of the village hall. This area contains fewer than 30 houses. The development proposed at TT15, which also lies entirely within the same 200 metre radius, would add 20 houses. This represents an increase of some 70 per cent in only seven years. Such a rate of expansion is excessive for a small village and inappropriate for the LDP.

(5) The volume of expansion envisaged under proposal TT15 is contrary to the clearly expressed wishes of the local community. The proposal under TT15 originally appeared in the MIR and subsequently reappeared in the draft LDP approved in November 2015 and the current proposed plan of September 2016. Two public consultation events were held in the village hall under the auspices of the Community Council. ELC officers presented the housing proposals. Through the Community Council, the local community clearly conveyed the consensus view that while development in Humbie was not opposed in principle, the proposed development of 20 houses was excessive and badly located. Despite this, there appears to have been no material change in proposal TT15 as a result of the consultation events. The Council's Service Manager, Planning claimed at the Council meeting on 6 September 2016 that community consultation had been carried out, but the resulting Proposed LDP appears to entirely disregard the views expressed.

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

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

Justification for Modification(s):

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:

Humbie - Inset Map 21

The area of land allocated for housing in Humbie, shown as proposal TT15, should be reduced from the present 1.7 ha to approximately 0.5 ha.

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) :

Humbie - Inset Map 21

The Proposed LDP envisages 20 houses for Humbie on site proposal TT15. This number is excessive for the reasons detailed under response to 2(d) 15(b). Reducing the area to 0.5 ha would significantly mitigate the negative impacts of the proposed development but still provide ample space for a more proportionate expansion.

Visual Upload:

No file was uploaded

Visual Upload:

No file was uploaded

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-01 23:01:08**

About You

1 What is your name?

First name:

Joe

Surname:

Cox

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 resident/member of the public

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

Organisation:

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::

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

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

Full removal from the proposed LDP.

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):

This is a "greenfield" site and should not be prioritised over the redevelopment of Prop NK6. This proposal, in conjunction with NK6/8/9, would increase the size of Gullane by approx. 30% without increasing the Infra-structure to support - where is the justification for this magnitude of development?

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:

Full removal from the proposed LDP.

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):

This is a "greenfield" site and should not be prioritised over the redevelopment of Prop NK6. This proposal, in conjunction with NK6/7/9, would increase the size of Gullane by approx. 30% without increasing the Infra-structure to support - where is the justification for this magnitude of development?

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:

Full removal from the proposed LDP.

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) :

This is a "greenfield" site and should not be prioritised over the redevelopment of Prop NK6. This proposal, in conjunction with NK6/7/8, would increase the size of Gullane by approx. 30% without increasing the Infra-structure to support - where is the justification for this magnitude of development?

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) :

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-02 10:46:31**

About You

1 What is your name?

First name:

Alex

Surname:

Mitchell

2 What is your email address?

Email address:

3 Postal Address

Address:

31 Balmoral Drive
Bishopton
Renfrewshire
PA7 5HR

4 Please enter your postcode

Postcode:

PA7 5HR

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

Developer/ agent/ landowner

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

Organisation:

Zander Planning Ltd

Your role:

Director

7 Are you supporting the plan?

Yes

If Yes: Please include your reasons for support:

On behalf of Ediston Real Estate I wish to support the allocation of the site at Peppercraig East, Haddington under Prop HN8. In supporting this allocation we request that the requirement for a comprehensive masterplan for the whole site is reviewed. This is not necessary given the nature of the site as it is likely to be developed in different phases.

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 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:

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):

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:

PROP HN8 - page 42 - No objections to this Proposal but seek a minor modification relating to the need for a comprehensive masterplan for the entire site.

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):

The nature of the site at Peppercraig East means that it is likely to be developed in phases of development. The linear shape of the site lends itself to phasing development and infrastructure through smaller more manageable development plots. It is unlikely that the site will be served by one access road, for example. Indeed the Development Brief for the site indicates that there could be 3 access locations along the A199. This supports the position that the site should be looked at as smaller development plots that can be brought forward over the time period of the LDP.

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 3 - Town Centres, Employment and Tourism (pages 57 - 63)

1a General Urban Development Policies - What modifications do you wish to see made to this 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 General Urban Development Policies 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 Planning for Employment - What modifications do you wish to see made to the Planning for Employment 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 Planning for Employment 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 Tourism - What modifications do you wish to see made to the Tourism 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 Tourism 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):

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-02 17:35:15**

About You

1 What is your name?

First name:

Michael

Surname:

Izzi

2 What is your email address?

Email address:

3 Postal Address

Address:

5 St John Street
Perth

4 Please enter your postcode

Postcode:

PH1 5SP

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

Local resident/member of the public

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

Organisation:

Strutt & Parker

Your role:

Planning and Development Surveyor.

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

Section 1 - Introduction (pages 1-10)

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

Modification(s) sought::

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

Justification for Modification(s):

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:

We would like to see an amendment to Inset Map 26 (Musselburgh and Wallyford) to extend the newly revised settlement boundary to include Eskfield Cottages as shown on the attached plan.

We would seek an amendment to Green Belt boundaries on Inset Map 26 (Musselburgh and Wallyford) to exclude Eskfield Cottages as shown on the attached plan..

We would like to see an amendment to Inset Map 3 (landscape designations and infrastructure designations) to extend the newly revised settlement boundary to include Eskfield Cottages as shown on the attached plan.

We would seek an amendment to Green Belt boundaries on Inset Map 3 (landscape designations and infrastructure designations) to exclude Eskfield Cottages as shown on the attached plan.

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) :

We support the inclusion of the How Mire Allocation (MH13) within the Local Development Plan and the reconfiguration of the Wallyford Settlement Boundary to accommodate its future delivery. As a result of the future expansion/growth of the settlement and modifications made to accommodate this, our clients find themselves in a situation where half of their garden ground would be located within the settlement boundary and the other half in the green belt along with the Eskfield cottages.

Taking this into consideration, and given the proposed changes to the settlement boundary, we see merit in continuing the extension to include the Eskfield Cottages and excluding it from the Green Belt.

We cannot see any logical reason for the proposed settlement boundary and we believe it would be logical to follow the defined features of the landscape, i.e the road, to form the new settlement boundary.

Whilst we support the need for Green Belt in this location we believe that the Green Belt Boundary should be amended to reflect the criteria outlined in Paragraph 51 of SPP 2014 which states that greenbelt boundaries should follow "clearly visible boundary markers based on landscape features such as rivers, tree belts, railways, or main roads".

The area of land we would like to see removed from the Green Belt and included in the settlement boundary is located on the southern edge of the MH13 Allocation as shown on the attached plan. The current Green Belt boundary the cottages where there is no clearly visible landscape feature to identify what is Green Belt and what is not. It seems logical, in this case, to use the road as the robust long term defensible Green Belt Boundary and the settlement boundary in this location. We believe that this would also comply with Para 51 of SPP 2014.

We believe this makes logical sense whether or not MH13 remains in the plan. Whilst this is a minor change to the plan, it has fundamental implications for our client and should be addressed in this plan. When considering the justification being located in the Green Belt we cannot see why its inclusion would support the spatial strategy of the settlement. When reviewing the Green Belt Objectives outlined in Para 49 in SPP 2014 which states that the Green Belt should;

- direct development to the most appropriate locations and supporting regeneration;
- protecting and enhancing the character, landscape setting and identity of the settlement; and
- protecting and providing access to open space we do not think

Taking the above into consideration, we do not believe that the inclusion in the Green Belt helps facilitate the overall Green Belt Objective. We believe that the amendments suggested in this representation provide a more logical and robust case for the future direction in this location and most importantly would have no adverse effect the established Green Belt.

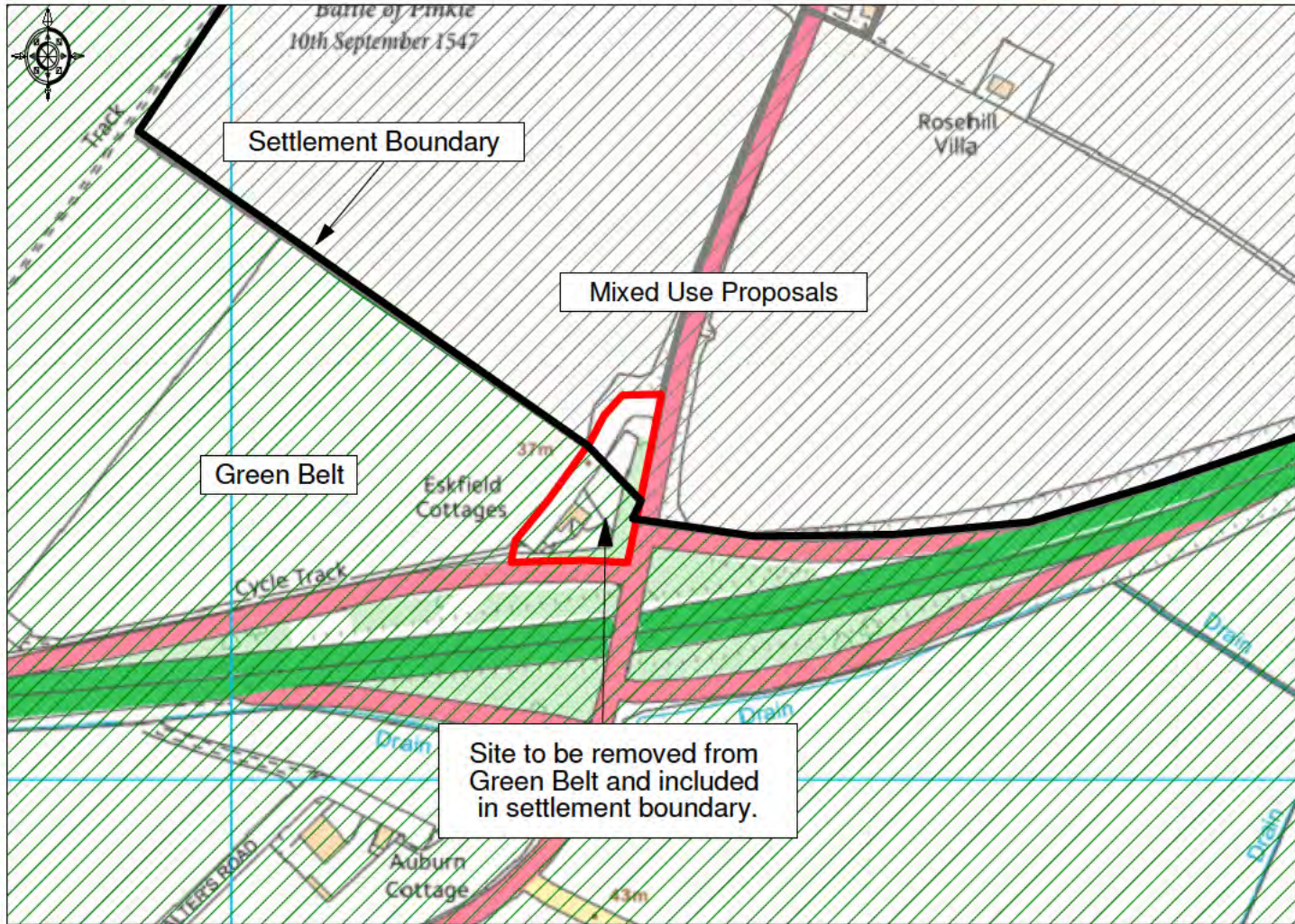
Visual Upload:

East Lothian, Musselburgh, Eskfield 2016.pdf was uploaded

Visual Upload:

No file was uploaded

East Lothian, Musselburgh, Eskfield Cottage - Change to Green Belt & Settlement Boundary



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This plan is for identification purposes only. Its accuracy can in no way be guaranteed.
Reproduced from the Ordnance Survey Map with permission of the Controller
H.M.S.O Crown copyright reserved. Licence No. ES100018525

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-02 22:08:59**

About You

1 What is your name?

First name:

Lianne

Surname:

Millar

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 resident/member of the public

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

Organisation:

Your role:

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

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:

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):

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:

Remove site MH13 from the plan

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):

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.

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:

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):

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

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-02 22:30:46**

About You

1 What is your name?

First name:

Fraser

Surname:

Millar

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 resident/member of the public

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

Organisation:

Your role:

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

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:

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):

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):

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Modifications(s) Sought:

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Modifications(s) Sought:

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Modifications(s) Sought:

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Justification for Modification(s):

10a PROP MH10: Land at Dolphinstone - 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:

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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):

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Modifications(s) Sought:

Remove site MH13 from the plan

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):

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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:

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):

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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

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-03 10:28:40**

About You

1 What is your name?

First name:

Aj

Surname:

Whitehead

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 resident/member of the public

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

Organisation:

Your role:

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-03 16:53:01**

About You

1 What is your name?

First name:

Philip

Surname:

Graham

2 What is your email address?

Email address:

m

3 Postal Address

Address:

Wemyss House
8 Wemyss Place
Edinburgh

4 Please enter your postcode

Postcode:

EH3 6DH

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

Developer/ agent/ landowner

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

Organisation:

Savills

Your role:

Senior Planner

7 Are you supporting the plan?

Yes

If Yes: Please include your reasons for support:

We support the Proposal Site TT9 Gladsmuir East, although we do request some modifications which may constitute objections, dependent on Council opinion.

We feel the Proposal Site is directly in line with national, strategic and local planning policy. In terms of Scottish Planning Policy, we believe the proposal is the "right development in the right place" and that allocation will help deliver accessible housing land; that the proposal site is within a settlement and that development will be accessible and help bring vibrancy to Gladsmuir; and that the site will assist the Council provide a generous 5 year effective housing land supply.

In terms of SESplan, Gladsmuir sits within an identified long term growth corridor. In addition, the proposal is in a marketable location for housing, and therefore meets the SESplan objective to "increase housing land supply". We believe the site is marketable due to its close proximity to the rail network (at Longniddry) and the road network to Haddington via the A199, and the A1 to Edinburgh and beyond.

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

1a PROP PS1: Longniddry South - What modifications do you wish to see made to Prop PS1 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.

Modification(s) Sought:

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1b Please give any information/reasons in support of each modification suggested to Prop PS1 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

2a PROP PS2: Land at Dolphingstone North, Prestonpans - What modifications do you wish to see made to Prop PS2 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 Prop PS2 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

3a Policy PS3: Development Briefs - What modifications do you wish to see made to Policy PS3 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 Policy PS3 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

Section 2d - Tranent Cluster Main Development Proposals

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

The last sentence of paragraph 2.99 "The masterplan for the site must integrate the development with the village and the surrounding landscape" should be deleted and replaced with the following sentence "The design statement submitted with a planning application must ensure integration of the development with the village and the surrounding landscape can be achieved"

Please note this modification relates to our submission for Policy TT17 'Development Briefs' (p37).

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

Justification for Modification(s):

Our clients welcome the formal support given to their site by PLDP Proposal TT9. However, we are not convinced that for a 20 unit development a masterplan will offer any substantive benefits over a design statement supporting a planning application. In the circumstances we would request that the Council reconsiders the requirement in Policy PS3 to provide a masterplan for all allocated sites, and accepts that a more proportionate and equally effective design response for smaller sites can be achieved through the submission of a Design Statement submitted in support of a planning application.

Please note this modification relates to our submission for Policy TT17 'Development Briefs' (p37).

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

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

Justification for Modification(s):

17a. We suggest the following modification to the text in the dark blue box at 'Policy TT17: Development Briefs' (p37):

"As part of any planning application for any allocated site of more than 50 units, comprehensive masterplan solutions for the entire allocated site must be submitted. For smaller sites, a Design Statement will be required. Proposed masterplans and Design Statements must conform to the relevant Development Brief prepared for the site. These documents must demonstrate how the relevant objectives for the allocated site will be secured, how development will be delivered on an appropriate phased basis, and set out design requirements to ensure the development will properly integrate with its surroundings and the character of the local area."

17b. Our clients welcome the formal support given to their site by PLDP Proposal TT9. However, we are not convinced that for a 20 unit development a masterplan will offer any substantive benefits over a design statement supporting a planning application. In the circumstances we would request that the Council reconsiders the requirement in Policy PS3 to provide a masterplan for all allocated sites, and accepts that a more proportionate and equally effective design response for smaller sites can be achieved through the submission of a Design Statement submitted in support of a planning application.

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-03 18:15:59**

About You

1 What is your name?

First name:

Stephen

Surname:

Edwards

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

4 Please enter your postcode

Postcode:

[REDACTED]

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

Local Interest Group

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

Organisation:

Inveresk Village Society

Your role:

Committee member

7 Are you supporting the plan?

No

If Yes: Please include your reasons for 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:

We object to the overall strategy as currently expressed in paragraphs 2.1 to 2.13 of the plan on the basis of its over-concentration of development in Musselburgh. We wish to see a reduction of 1000 dwellings in the cluster and we support the statement made by the Musselburgh Conservation Society (MCS) in its objection.

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

Justification for Modification(s):

The compact growth strategy is fundamentally flawed for the reasons set out by the MCS in its objection. In support of limiting the reduction to 1000 dwellings we would add that the land adjacent to Inveresk Village, an outstanding Conservation Area, is particularly vulnerable to inappropriate development proposals given any delay in plan preparation. Such proposals would threaten the integrity and character of the Conservation Area if accepted - and there is a tendency for reporters to accept such proposals to meet housing need in the absence of a 5 year supply.

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:

Remove proposals MH13 and MH15

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):

We support the justification set out under the specific site references in the MCS objection.

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:

We object to the omission of a spatial strategy or vision for Musselburgh in paragraphs 2.14 to 2.21 and support the incorporation of the wording set out in the MCS objection.

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):

We support the justification set out in the MCS objection.

By way of a general comment, Inveresk Village Society fully supports all the objections raised by Musselburgh Conservation Society in its response to the proposed Local Area Plan as it affects Inveresk Village.

We wish to make the following points concerning possible threats to Inveresk Village.

- 1). The large amount of new housing proposed will inevitably mean an increase in the already heavy traffic through Inveresk Village, with all the associated noise, pollution, speed and danger to pedestrians. Heavy vehicles should be required to use other routes and there should be a 20 miles per hour speed limit.
- 2). The fingers of Green Belt that provide the setting for Inveresk Village, as stated in the existing Local Area Plan, should never be sacrificed to development of any kind. This would severely damage the character of Inveresk Village by turning it into a built up suburban area.
- 3). There should be no further development of new housing in the grounds of existing houses within Inveresk Village, which would cause dangerous access problems along Inveresk Village Road. Both would severely damage the character of Inveresk Village by spoiling spacious gardens and by further increasing traffic.
- 4). Any proposed new housing development within the old Edenhall Hospital site should not be provided with access via Carberry Road in Inveresk Village but only via Pinkie Road in Musselburgh, otherwise the former would severely damage the character of Inveresk Village by further increasing traffic.
- 5). The unique character of Inveresk Village, one of the finest Conservation Areas in the whole of Scotland, has been carefully and thoroughly analysed in the Inveresk Conservation Area Character Appraisal recently drawn up jointly by East Lothian Council and Inveresk Village Society. This character must be respected and safeguarded.

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:

We object to the extent of the proposed allocation at Craighall (MH1) which should be reduced by 430 dwellings as a preferred contribution to the reduction of 1000 dwellings in the Musselburgh cluster.

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):

We support the justification set out in the MCS objection.

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:

We object to the extent of the proposed allocation at Dolphingstone (MH10) which should be reduced by 200 dwellings as a preferred contribution to the reduction of 1000 dwellings in the Musselburgh cluster.

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):

We support the justification set out in the MCS objection.

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:

We object most strongly to the inclusion of proposal MH13. It should be removed from the allocations and such removal would also be a preferred contribution to the reduction of 1000 dwellings in the Musselburgh cluster.

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):

This proposal is totally unacceptable. We see it as a real threat not only to the integrity of the battlefield site but long term to the setting, separate identity and character of Inveresk Village. We support the justification set out in the MCS objection. We would add that this proposal has the added disadvantage of channeling even more traffic through Inveresk Village and onto already congested junctions in Musselburgh.

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:

We object to the inclusion of proposal MH15 and its removal is a preferred contribution to the reduction of 1000 dwellings in the Musselburgh cluster.

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):

We support the justification set out in the MCS objection.

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:

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):

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 3 - Town Centres, Employment and Tourism (pages 57 - 63)

1a General Urban Development Policies - What modifications do you wish to see made to this 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 General Urban Development Policies 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 Planning for Employment - What modifications do you wish to see made to the Planning for Employment 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:

Remove proposal MH13 from the list of sites in Table EMP1 and include the displaced employment allocation (1ha) in a new allocation for proposal MH10.

2b Please give any information/reasons in support of each modification suggested to the Planning for Employment 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 support the justification set out in the MCS objection.

3a Tourism - What modifications do you wish to see made to the Tourism 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 Tourism 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 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:

We support and wish to see the modifications sought by the MCS in its objection.

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):

We support the justification set out in the MCS objection.

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:

We support and wish to see the modifications sought by the MCS in its objection.

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

Justification for Modification(s):

We support the justification set out in the MCS objection.

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:

There needs to be much greater emphasis given in the plan to primary care services in the Musselburgh cluster which will be under considerable pressure given the numbers of new dwellings proposed. We support the modifications sought in paragraphs 3.115 and 3.116 by the MCS in its objection.

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):

We support the justification set out by the MCS in its objection.

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

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

Modifications(s) Sought:

We support and wish to see the modifications to Policy T8 proposed by RELBUS in its objection.

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) :

It is essential that we maximize bus usage to reduce the impact of congestion in Musselburgh and unacceptable levels of traffic coming through Inveresjk Village. The plan can help to do so by ensuring that buses have good access into new developments so that as many residents as possible are within easy walking distance of a bus stop.

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:

Remove Howe Mire development site from the Musselburgh Inset Map (Map 26).

Remove Whitecraig North development site from the Whitecraig Inset Map (Map 37).

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) :

We support the justification set out in the MCS objection

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Additional Comments

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:

We support the points raised by the MCS in its objection.

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

Justification for Modification(s):

We support the justification set out in the MCS objection

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Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-03 19:46:36**

About You

1 What is your name?

First name:

Grant

Surname:

Young

2 What is your email address?

Email address:

grantyoung@youngplanning.com

3 Postal Address

Address:

Young Planning & Energy Consenting
Suite 29
196 Rose Street
Edinburgh

4 Please enter your postcode

Postcode:

EH2 4AT

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

Developer/ agent/ landowner

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

Organisation:

Neart na Gaoithe Offshore Wind Ltd c/o Young Planning & Energy Consenting

Your role:

Planning consultant responding on behalf of developer

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::

Paragraph 1.36: The sentence "Major electricity and gas distribution networks cross East Lothian" should be deleted and replaced with the following:

"A number of major electricity transmission routes cross East Lothian. Such infrastructure, including that related to major offshore renewables developments, are afforded national development status by virtue of National Planning Framework 3. Major gas distribution networks also cross East Lothian."

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):

Paragraph 1.36: The proposed amendment better reflects the planning policy status of major electricity transmission developments. The existing drafting does not recognise such status and fails to distinguish between a national development (major electricity transmission infrastructure) and non-national developments (in this case the major gas distribution network). The proposed amendment provides a more accurate context to the planning basis afforded to energy infrastructure

within East Lothian and is consistent with the approach adopted by the Council in providing more detail at paragraph 1.46.

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

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

(a) Policy EGT4: Enhanced High Voltage Electricity Transmission Network: Identify existing text as part "(a)". That paragraph should precede a new part (b), as follows:

"(b) Inset Map 3 identifies sites of large scale electricity transmission infrastructure which fall within the scope of the National Planning Framework national development number 4. The Council will safeguard these sites for such development and will not support proposals for development which might negatively impact upon the delivery of developments within the scope of national development number 4, or subsequent national development designation."

(b) Strategy Diagram 3: Energy Generation, Distribution and Transmission and Waste Facilities: Reference to the amended policy EGT4 should be included.

(c) Paragraph 4.97: Add a new third sentence: "For example, landfall for the approved onshore transmission infrastructure associated with the Neart na Gaoithe Offshore Wind Farm is adjacent to Torness, with its grid connection via a new substation in the Lammermuirs adjacent to Crystal Rig."

(d) Paragraph 4.99: Amend the sentence "The Council supports this in principle in appropriate locations" to read: "The Council supports this in principle in appropriate locations and will seek to safeguard sites with planning permission for development which is within the scope of NPF3's national development number 4 against proposals for development which could prejudice the delivery of such nationally significant infrastructure."

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):

(a) Justification for (a), above: Whilst NnGOWL welcomes the reference to the route of its onshore infrastructure, illustrated on Strategy Diagram 3: Energy Generation, Distribution and Transmission and Waste Facilities, that diagram is essentially a standalone graphic for information purposes and carries no policy weight; in no way does the diagram contribute towards the safeguarding of the infrastructure illustrated therein.

Identification of land to be safeguarded against potentially conflicting development is necessary in order to meet the requirement, stated at paragraph 1.44 of the Proposed LDP, that: "NPF3 sets out the long term development strategy for Scotland and identifies National Developments that should be included in development plans" (our emphasis).

Furthermore, the Proposed LDP recognises allocation of land on the Proposals Map as a means of safeguarding sites against development which with potential to conflict with a national development designation. For example, in the case of the former Cockenzie Power Station site, paragraph 4.91 of the Proposed LDP states: "...the entire site now requires to be safeguarded... in accordance with NPF3's expectations. A safeguard for this purpose would be the only way to ensure that the Scottish Government's 'National Development 3' is not prejudiced.

The only way to ensure safeguarding of the national development is to make spatial reference to the site on the Proposals Map, cross referencing to (the amended, see NnGOWL response to Section 4) Policy EGT4 (part (B)). Without such measures, proposals for development which fully or partially prevents the delivery of our infrastructure could be considered acceptable in policy terms. In such circumstances planning permission could be approved as a result, potentially preventing the delivery of nationally significant infrastructure in the process.

(b) Justification for (b), above: Although the diagram is for information purposes only, the amended Policy EGT4 should be included on Strategy Diagram 3 to maximise transparency and to emphasise the safeguarding of routes within the scope of NPF3's national development number 4.

(c) Justification for (c), above: Provides context for relevant development within the East Lothian area.

(d) Justification for (d), above: The proposed addition to paragraph 4.99 provides context within the supporting text to the proposed amendment of Policy EGT4.

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):

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:

(a) Policy DC1: Rural Diversification: The sentence: "Proposals must also satisfy the terms of Policy NH1 and other relevant plan policies including Policy DC6" should be amended to read as follows: "Proposals must also satisfy the terms of Policy NH1 and other relevant plan policies including Policy DC6, as well as taking account of the requirements of Policy EGT4(b)."

(b) Policy DC4: New Build Housing in the Countryside: A new criterion should be included to read as follows: "(iv) The proposal does not prejudice the delivery of development covered by Policy EGT4(b)."

(c) Policy DC4: New Build Housing in the Countryside: The bullet points (i) to (iii) should be amended to clarify whether "and" or "or" applies.

(d) Policy DC6: Development in the Coastal Area: A new sentence should be included after the third bullet point, reading as follows: "In all cases development will only be supported where it does not prejudice the delivery of development covered by Policy EGT4(b)."

(e) Paragraph 5.7: at the end of paragraph 5.7, include: "Policies relating to development in the countryside or in coastal areas ensure that nationally significant electricity transmission infrastructure developments, such as onshore infrastructure associated with the Neart na Gaoithe Offshore Wind Farm, will be safeguarded against proposals which might prejudice their delivery."

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):

(a) The following justification applies equally to points (a), (b) and (d), above. For avoidance of doubt, references to Policy EGT4(b) correspond with NnGOWL's proposed amendment to Policy EGT4, as detailed within NnGOWL's response to Section 4, Parts 4a and 4b:

The nature of major electricity transmission developments is such that, given the prevalence of such locations within the East Lothian area, it is likely there will be

regular instances of major electricity transmission developments occurring within areas of open countryside and/or coastal areas. The national significance of such developments merits reference in open countryside/coastal policy designation areas where there are likely to be instances of potential conflict. Inclusion of the suggested text is intended as a transparent safeguard against inappropriate development; specifically, that which might prejudice the delivery of infrastructure supported by NPF3's national development number 4. It acts as a prompt to both the Council and applicants to ensure that proposals do not conflict with the delivery of priority electricity transmission infrastructure developments.

(b) The justification for point (c), above, is that the existing drafting lacks clarity which will impact upon the effective implementation of the policy.

(c) The justification for point (e), above, is to provide context in the supporting text, to the proposed amendments to Policies DC1, DC4 and DC6.

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 3: Inclusion of a designation identifying the site of extant planning permission reference 15/00634/PM. The associated key should be updated to identify the designation as "Safeguarding of electricity transmission infrastructure (see Policy EGT4 (part (B)))".

Inset Map 22: Inclusion of a designation identifying in the north west corner of the map part of the site of extant planning permission reference 15/00634/PM. The associated key should be updated to identify the designation as "Safeguarding of electricity transmission infrastructure (see Policy EGT4 (part (B)))".

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

Justification for Modification(s) :

The following justification applies to both Inset Maps 3 and 22:

Whilst NnGOWL welcomes the reference to the route of its onshore infrastructure, illustrated on Strategy Diagram 3: Energy Generation, Distribution and Transmission and Waste Facilities, that diagram is essentially a standalone graphic for information purposes and carries no policy weight; in no way does the diagram contribute towards the safeguarding of the infrastructure illustrated therein.

Identification of land to be safeguarded against potentially conflicting development is necessary in order to meet the requirement, stated at paragraph 1.44 of the Proposed LDP, that: "NPF3 sets out the long term development strategy for Scotland and identifies National Developments that should be included in development plans" (our emphasis).

Furthermore, the Proposed LDP recognises allocation of land on the Proposals Map as a means of safeguarding sites against development which with potential to conflict with a national development designation. For example, in the case of the former Cockenzie Power Station site, paragraph 4.91 of the Proposed LDP states: "...the entire site now requires to be safeguarded... in accordance with NPF3's expectations. A safeguard for this purpose would be the only way to ensure that the Scottish Government's 'National Development 3' is not prejudiced.

The only way to ensure safeguarding of the national development is to make spatial reference to the site on the Proposals Map, cross referencing to (the amended, see NnGOWL response to Section 4) Policy EGT4 (part (B)). Without such measures, proposals for development which fully or partially prevents the delivery of our infrastructure could be considered acceptable in policy terms. In such circumstances planning permission would be approved as a result, potentially preventing the delivery of nationally significant infrastructure in the process.

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Additional Comments

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:

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

Justification for Modification(s):

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Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-03 21:30:00**

About You

1 What is your name?

First name:

Tay

Surname:

Wilson

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

4 Please enter your postcode

Postcode:

[REDACTED]

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

Local resident/member of the public

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

Organisation:

Your role:

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

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:

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):

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:

Remove mh13

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):

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.

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:

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):

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

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-03 22:11:22**

About You

1 What is your name?

First name:

Robert

Surname:

Richardson

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

[REDACTED]

4 Please enter your postcode

Postcode:

[REDACTED]

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

Local resident/member of the public

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

Organisation:

Your role:

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

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:

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):

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:

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):

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 Dolphinstone - 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:

Remove M13 from plan

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):

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.

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:

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):

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

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-04 09:02:58**

About You

1 What is your name?

First name:

Jane

Surname:

Tennant

2 What is your email address?

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developmentplans@gov.scot

3 Postal Address

Address:

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Edinburgh

4 Please enter your postcode

Postcode:

EH6 6QQ

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

Other

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

Organisation:

Scottish Government

Your role:

Graduate Planner

7 Are you supporting the plan?

Not Answered

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::

Para 1.47 Change

"The Central Scotland Green Network is also a National Development which is to extend into East Lothian. It is to help maintain the environmental quality of the area and to promote active travel and healthier lifestyles."

to:

"The Central Scotland Green Network is also a National Development which extends into East Lothian. It is to help maintain the environmental quality of the area, tackle vacant and derelict land and promote active travel and healthier lifestyles."

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):

The Central Scotland Green Network (CSGN) has been a national development, since its designation in National Planning Framework 2 in July 2009

<http://www.gov.scot/Publications/2009/07/02105627/0>. The current wording in paragraph 1.47 that the CSGN 'is to extend into East Lothian' implies that it will be

extended into the council area at some point in the future, whereas parts of the green network will already be there and linkages and enhancements to the network should already be being considered and acted on. The Scottish Government would expect to see a clearer reflection of the CSGN already being in existence within the Council area.

NPF3 sets out 3 priorities for the CSGN : active travel, tackling vacant and derelict land and disadvantaged communities. We are aware that the CSGN Trust carried out a Review of Vacant and Derelict Sites in the East Lothian Council area (May 2014), which included 18 site reports , covering 17.68ha. Within the sentence about the purpose of the CSGN, we would therefore suggest the addition of reference to tackling vacant and derelict land.

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 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:

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):

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

1a What modifications do you wish to see made to the Strategy map for the Prestonpans/Cockenzie/Port Seton/Longniddry Cluster? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question. Do you have any comments to make on the

Modifications(s) Sought :

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

Justification for Modification(s) :

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

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

Modifications(s) Sought:

Page 24: paragraph 2.51 should be amended to better reflect paragraph 1.46 and National Planning Framework 3.

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

Justification for Modification(s):

Paragraph 2.51 prevents uses other than those defined in national development 3 on the former Cockenzie power station site. This does not fully accord with the aspiration NPF3 has for the site. Paragraph 1.46 of the proposed plan better reflects this position. National Planning Framework 3 (page 39) is clear that 'Given the particular assets of Cockenzie, if there is insufficient land for competing proposals, we wish to see priority given to those which make best use of this location's assets, and which will bring the greatest economic benefits.'

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

1a PROP PS1: Longniddry South - What modifications do you wish to see made to Prop PS1 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.

Modification(s) Sought:

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1b Please give any information/reasons in support of each modification suggested to Prop PS1 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

2a PROP PS2: Land at Dolphingstone North, Prestonpans - What modifications do you wish to see made to Prop PS2 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 Prop PS2 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

3a Policy PS3: Development Briefs - What modifications do you wish to see made to Policy PS3 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 Policy PS3 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

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

1a PROP BW1: Blindwells New Settlement- What modifications do you wish to see made to Prop BW1 of 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 Please give any information/reasons in support of each modification suggested to Prop BW1 of the Plan. State all relevant paragraph numbers of the proposed plan to which the modification(s) refer.

Justification for Modification(s):

2a PROP BW2: Safeguarded Blindwells Expansion Area - What modifications do you wish to see made to Prop BW2 of 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) :

Transport Scotland representation by separate email:

1) Prop BW2 Safeguarded Blindwells Expansion Area

2b Please give any information/reasons in support of each modification suggested to Prop BW2 of the Plan. State all relevant paragraph numbers of the proposed plan to which the modification(s) refer.

Justification for Modification(s):

3a Policy BW3: Blindwells Area Design Framework - What modifications do you wish to see made to Prop X of 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:

3b Please give any information/reasons in support of each modification suggested to Policy BW3 of the Plan. State all relevant paragraph numbers of the proposed plan to which the modification(s) refer.

Justification for Modification(s):

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

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

Modifications(s) Sought:

1 - Para 3.4, second sentence

"Such uses could include retail, commercial leisure uses, offices (class 2), community and cultural facilities, and potentially public buildings such as libraries, education and healthcare facilities." Change the wording "and potentially" to "and where appropriate, other".

2 - Para 3.7, second sentence Change wording from:

"While many Class 4 proposals will be appropriate in scale and character for a town centre and will normally be expected to locate there, some Class 4 proposals may be better located on land specifically allocated by the Plan for such use."

to :

"Class 4 office proposals will normally be expected to locate in town centres, where appropriate in scale and character, however some Class 4 proposals may be located on land specifically allocated by the Plan for such use."

3 - TC2: Town and Local Centres second paragraph

Change first sentence from:

"Residential use may also be acceptable, particularly in a backland or above ground floor location."

to :

"Residential use will be supported, particularly in backland or above ground floor locations."

4 - Paragraph 3.15, third sentence:

Delete words 'non-statutory' before 'supplementary guidance'.

1b Please give any information/reasons in support of each modification suggested to the General Urban Development Policies 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):

1 - Scottish Planning Policy (2014) (SPP), paragraph 68 states "Development plans should adopt a sequential town centre first approach when planning for uses which generate significant footfall, including retail and commercial leisure uses, offices, community and cultural facilities and, where appropriate, other public buildings such as libraries, and education and healthcare facilities." The requested change will ensure consistency with the term used in SPP.

Using the word 'potentially' can be taken to imply a degree of discretion / option as to whether these uses are considered against the town centre first approach, whereas there should be a point where this is considered, and then it be applied where appropriate. Providing this consistency will help ensure there town centre first approach is followed as set out in SPP.

2 - Class 4 includes use as an office. Scottish Planning Policy (2014) (SPP), specifically says that the sequential approach should apply to offices. Office workers can support town centres through lunchtime shopping / activity, and benefit from the sustainable transport options which town centres offer and benefit from.

We feel the suggested change will more closely align with the spirit of the town centre first approach set out in SPP.

3 - The Town Centres Review identified town centre living as one of its themes. In its response, the Scottish Government's Town Centre Action Plan (TCAP)(2013) includes Town Centre Living as a key strand, stating the Scottish Government endorses the idea of encouraging more people to live in town centres.

Following on from the TCAP, one of Scottish Planning Policy (2014) (SPP)'s policy principles, as set out in paragraph 60, is that the planning system should consider opportunities for promoting residential use within town centres where this fits with local need and demand.

The Scottish Government's Local Housing Strategy Guidance seeks to encourage local authorities to fully consider the role that town centres can play as residential communities.

The current wording in TC2, "Residential use may also be acceptable..." raises an element of doubt and does not set out the positive framework to promote town centre living which the Scottish Government expects.

We request the wording be changed to have a more positive tone towards living in town centres and proposals for residential use in such locations.

4 - Scottish Planning Policy (2014) (SPP), expects local authorities, working with partners to use the findings of town centre health checks to develop a strategy to deliver improvements in the town centre. To give weight to town centre strategies, by making their spatial elements part of the development plan to support their delivery, SPP paragraph 66, goes on to state "The spatial elements of town centre strategies should be included in the development plan or supplementary guidance."

Where SPP talks about 'supplementary guidance' Ministers expect this to be formal statutory supplementary guidance, as covered by section 22 of the Town and Country Planning (Scotland) Act 1997 (as amended). Circular 6/2013 'Development Planning' <http://www.gov.scot/Resource/0044/00441577.pdf> confirms paragraph 148 "non-statutory guidance should not be termed Supplementary Guidance and will not form part of the development plan."

Therefore, the Council's proposal to take forward the town centre strategies as non-statutory supplementary guidance, non-statutory guidance not to be termed

Supplementary Guidance as set out the Circular, does not comply with SPP which says that the spatial elements of town centre strategies should be included in the development plan or supplementary guidance.

2a Planning for Employment - What modifications do you wish to see made to the Planning for Employment 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 Planning for Employment 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 Tourism - What modifications do you wish to see made to the Tourism 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 Tourism 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 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:

1 - Table HOU2 (Page 67): demolitions and surplus should be shown as negative figures.

2 - Reference should be made in the plan to how the additional allowance from the SESplan supplementary guidance has been taken into account.

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):

1 - Change sought to ensure clarity.

2 - Change sought to ensure clarity.

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:

Transport Scotland representations by separate email:

- 1) Policy T32: Transport Infrastructure Delivery Fund
- 2) DPMTAG Transport Appraisal
- 3) PROP T18 Land Safeguard for Trunk Road Interchange at Adniston and Eastern Tranent By-pass
- 4) Policy PROP T10: Safeguarding Land for Platform Lengthening

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

- 1 - Page 102, paragraph 4.73 - remove the first sentence.

2 - Page 103, paragraph 4.81. The statement should set out the matters that will be addressed in the Wind Energy Supplementary Guidance.

3 - Page 108: PROP ETG1 should be re drafted to include the arrangements for Cockenzie as set out on page 39 of National Planning Framework 3 reflecting that there may be insufficient land for competing proposals and that priority should go to those that make best use of the location's assets and which bring the greatest economic benefits.

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):

1 - The first sentence refers to text in a previous version of Scottish Planning Policy.

Reference could be made to the Scottish Government's Annual Report on the Operation of Section 72 of the Climate Change (Scotland) Act 2009 as published on the Scottish Government's website which provides information on how the legislative requirements can and have been implemented.

2 - To ensure consistency with Section 27(2) of the Town and Country Planning (Development Planning) (Scotland) Regulations 2008.

3 - Prop ETG1: Land at former Cockenzie power station does not allow for other uses of the site beyond thermal generation in the life time of NPF3 or until a thermal plant is developed and surplus land identified. This does not accord fully with the aspiration of National Planning Framework 3 for the area.

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):

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:

Page 120, paragraph 5.10: change 'Housing permitted in these circumstances will be tied to the business for which it is justified' to 'Housing permitted in these circumstances may in exceptional circumstances be tied to the business for which it is justified'.

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 refer to and expand upon our comments to an earlier draft of the proposed plan and note that no changes have been made in this regard.

We appreciate that paragraph 5.10 aims to set out the circumstances in which development outwith settlements may be appropriate so is partly in accordance with paragraph 81 of SPP. However, the second part of the paragraph sets out circumstances in which housing will be tied to businesses in every such circumstance. This would appear to require occupancy restrictions, so if this is not the case, this should be clearly explained. If this will require occupancy restrictions, it is contrary to SPP policy which states that occupancy restrictions should be avoided. Given that a policy such as this that requires them in every circumstance it is not considered that this can be considered 'avoiding the use of occupancy restrictions'.

Section 6a - Our Natural Heritage (pages 125-132)

1a Biodiversity and Geodiversity - What modifications do you wish to see made to the Biodiversity and Geodiversity 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:

Protection of Local Sites and Areas: the wording of the policy be amended – specifically that “public benefits” be replaced with “social, economic or environmental benefits” and that “to the local area” be removed from the second paragraph.

1b Please give any information/reasons in support of each modification suggested to the Biodiversity and Geodiversity 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):

SPP is clear that the level of protection given to local designations should not be as high as that given to international or national designations. The second paragraph of the policy sets out that “development will only be permitted where it is demonstrated that any damage to the natural heritage interest or public enjoyment of the site is outweighed by the public benefits of the development to the local area and suitable mitigation will be secured”.

There may be instances where a development proposed in such a location would not be necessarily benefit the immediate local area, but could have for example regional or national benefits. Firstly there is also some ambiguity around how “public benefit” would have to be defined. Secondly the wording of the policy could inadvertently prevent development where there is demonstrable benefit either in the local, national or international interest from taking place. There is a need to ensure that the policy provides for a proportionate and balanced consideration to take place on development affecting local sites and areas, better recognising the lower level of protection to be afforded to local sites and areas compared to the policy considerations for national or international sites.

2a Soil Quality - What modifications do you wish to see made to the Soil Quality 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 Soil Quality 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 Trees and Woodland - What modifications do you wish to see made to the Trees and Woodland 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 Trees and Woodland 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 Protecting and Enhancing the Water Environment - What modifications do you wish to see made to the Water Environment 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 Water Environment 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 Sustainable Drainage Systems (SuDs) - What modifications do you wish to see made to the SuDs 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 Sustainable Drainage Systems (SuDS) 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 Flood Risk - What modifications do you wish to see made to the Flood Risk 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 Flood Risk 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 Air Quality - What modifications do you wish to see made to the Air Quality 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 Air Quality 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 Noise - What modifications do you wish to see made to the Noise 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 Noise 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 6b - Our Cultural Heritage (pages 133-136)

1a Development Affecting Listed Buildings - What modifications do you wish to see made to Affecting Listed Buildings 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 Development Affecting Listed 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) :

2a Development Affecting Conservation Areas - What modifications do you wish to see made to the Development Affecting Conservation 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:

2b Please give any information/reasons in support of each modification suggested to the Development Affecting Conservation 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):

3a Development Affecting Scheduled Monuments and Archaeological Sites - What modifications do you wish to see made to the Development Affecting Scheduled Monuments and Archaeological 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:

3b Please give any information/reasons in support of each modification suggested to the Development Affecting Scheduled Monuments and Archaeological 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):

4a Development Affecting Gardens and Designed Landscapes - What modifications do you wish to see made to the Development Affecting Gardens and Designed Landscapes 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:

Remove 'Government' from the first sentence of section 6.54 on page 135 and replace with 'Planning' so it reads 'Scottish Planning Policy requires...'

4b Please give any information/reasons in support of each modification suggested to the Development Affecting Gardens and Designed Landscapes 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):

Historic Environment Scotland (HES) now takes the lead on Gardens and Designed Landscapes not the Scottish Government – see following link <https://www.historicenvironment.scot/advice-and-support/listing-scheduling-and-designations/gardens-and-designed-landscapes/what-is-the-inventory-of-gardens-and-desi>

5a Area Based Cultural Heritage Policies - What modifications do you wish to see made to the Area Based Cultural Heritage Policies 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 Area Based Cultural Heritage Policies 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 8 - Delivery (pages 142 - 144)

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

Modifications(s) Sought:

1 - Provide details in policy DEL1 or the accompanying text of the broad items for which financial or other contributions will be sought.

1b Please give any information/reasons in support of each modification suggested to the Delivery 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):

1 - The plan provides a good level of detail on the broad types and locations of contributions. The contribution zones set out details of education, transport and sports facilities contributions and paragraph 8.9 sets out the relevant policies to the developer contributions framework. However, it is not clear whether this covers all the items for which contributions will be sought. This should be clarified in accordance with paragraph 139 of circular 6/2013 which requires items for which financial or other contributions will be sought, to be in the plan itself rather than supplementary.

Additional Comments

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:

1 - Open Space Provision. Additional wording should be inserted into the plan to encourage opportunities for a range of community growing spaces.

2 - Active Travel. We would request that the planning authority identify at least one exemplar walking- and cycling friendly settlement in the Plan.

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

Justification for Modification(s):

1 - There is no reference to community growing spaces in the plan. Scottish Planning Policy, paragraph 227, states that plans should encourage opportunities for a range of community growing spaces. The Proposed Plan, whilst making reference to allotments, does not refer to community growing, which includes community gardens, community orchards, community market gardens and community farms. The Scottish Government requests additional wording be inserted into the plan to encourage opportunities for a range of community growing spaces.

2 - Paragraph 5.14 of NPF3 states that we will encourage local authorities to develop at least one exemplar walking- and cycling friendly settlement to demonstrate how active travel networks can be significantly improved.

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T: [REDACTED]
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By email: ldp@eastlothian.gcsx.gov.uk

Our ref: A15684089

3 November 2016

Dear Development Plan Team

East Lothian Proposed Local Development Plan Consultation

Thank you for the opportunity to comment on the Proposed East Lothian Local Development Plan and Developer Contributions Supplementary Guidance, highlighted in your correspondence of 14 September 2016. Please find below a summary of the formal response of the Scottish Government (SG) these have been added to the online portal. Transport Scotland's formal response is included in full here, as indicated in the online response.

Town Centres

1 - Modification

Para 3.4, second sentence

"Such uses could include retail, commercial leisure uses, offices (class 2), community and cultural facilities, and potentially public buildings such as libraries, education and healthcare facilities." Change the wording "and potentially" to "and where appropriate, other".

Representation

Scottish Planning Policy (2014) (SPP), paragraph 68 states "Development plans should adopt a sequential town centre first approach when planning for uses which generate significant footfall, including retail and commercial leisure uses, offices, community and cultural facilities and, where appropriate, other public buildings such as libraries, and education and healthcare facilities."

The requested change will ensure consistency with the term used in SPP.

Using the word 'potentially' can be taken to imply a degree of discretion / option as to whether these uses are considered against the town centre first approach, whereas there should be a point where this is considered, and then it be applied where appropriate.

Providing this consistency will help ensure there town centre first approach is followed as set out in SPP.

2 - Modification

Para 3.7, second sentence Change wording from:

“While many Class 4 proposals will be appropriate in scale and character for a town centre and will normally be expected to locate there, some Class 4 proposals may be better located on land specifically allocated by the Plan for such use.”

to :

“Class 4 office proposals will normally be expected to locate in town centres, where appropriate in scale and character, however some Class 4 proposals may be located on land specifically allocated by the Plan for such use.”

Representation

Class 4 includes use as an office. Scottish Planning Policy (2014) (SPP), specifically says that the sequential approach should apply to offices. Office workers can support town centres through lunchtime shopping / activity, and benefit from the sustainable transport options which town centres offer and benefit from.

We feel the suggested change will more closely align with the spirit of the town centre first approach set out in SPP.

3 - Modification

TC2: Town and Local Centres second paragraph

Change first sentence from:

“Residential use may also be acceptable, particularly in a backland or above ground floor location.”

to :

“Residential use will be supported, particularly in backland or above ground floor locations.”

Representation

The Town Centres Review identified town centre living as one of its themes. In its response, the Scottish Government’s Town Centre Action Plan (TCAP)(2013) includes Town Centre Living as a key strand, stating the Scottish Government endorses the idea of encouraging more people to live in town centres.

Following on from the TCAP, one of Scottish Planning Policy (2014) (SPP)’s policy principles, as set out in paragraph 60, is that the planning system should consider opportunities for promoting residential use within town centres where this fits with local need and demand.

The Scottish Government’s Local Housing Strategy Guidance seeks to encourage local authorities to fully consider the role that town centres can play as residential communities.

The current wording in TC2, “Residential use may also be acceptable...” raises an element of doubt and does not set out the positive framework to promote town centre living which the Scottish Government expects.

We request the wording be changed to have a more positive tone towards living in town centres and proposals for residential use in such locations.

4 - Modification

Para 3.15, third sentence Delete words 'non-statutory' before 'supplementary guidance'.

Representation

Scottish Planning Policy (2014) (SPP), expects local authorities, working with partners to use the findings of town centre health checks to develop a strategy to deliver improvements in the town centre. To give weight to town centre strategies, by making their spatial elements part of the development plan to support their delivery, SPP paragraph 66, goes on to state "The spatial elements of town centre strategies should be included in the development plan or supplementary guidance."

Where SPP talks about 'supplementary guidance' Ministers expect this to be formal statutory supplementary guidance, as covered by section 22 of the Town and Country Planning (Scotland) Act 1997 (as amended). Circular 6/2013 'Development Planning' <http://www.gov.scot/Resource/0044/00441577.pdf> confirms paragraph 148 "non-statutory guidance should not be termed Supplementary Guidance and will not form part of the development plan."

Therefore, the Council's proposal to take forward the town centre strategies as non-statutory supplementary guidance, non-statutory guidance not to be termed Supplementary Guidance as set out the Circular, does not comply with SPP which says that the spatial elements of town centre strategies should be included in the development plan or supplementary guidance.

5 - Modification

Page 102, paragraph 4.73 - remove the first sentence.

Representation

The first sentence refers to text in a previous version of Scottish Planning Policy.

Reference could be made to the Scottish Government's Annual Report on the Operation of Section 72 of the Climate Change (Scotland) Act 2009 as published on the Scottish Government's website which provides information on how the legislative requirements can and have been implemented.

6 - Modification

Page 103, paragraph 4.81. The statement should set out the matters that will be addressed in the Wind Energy Supplementary Guidance.

Representation

To ensure consistency with Section 27(2) of the Town and Country Planning (Development Planning) (Scotland) Regulations 2008.

7 - Modification

Page 24: paragraph 2.51 should be amended to better reflect paragraph 1.46 and National Planning Framework 3.

Representation

Paragraph 2.51 prevents uses other than those defined in national development 3 on the former Cockenzie power station site. This does not fully accord with the aspiration NPF3 has for the site. Paragraph 1.46 of the proposed plan better reflects this position. National Planning Framework 3 (page 39) is clear that 'Given the particular assets of Cockenzie, if

there is insufficient land for competing proposals, we wish to see priority given to those which make best use of this location's assets, and which will bring the greatest economic benefits.'

8 - Modification

PROP ETG1 should be re drafted to include the arrangements for Cockenzie as set out on page 39 of National Planning Framework 3 reflecting that there may be insufficient land for competing proposals and that priority should go to those that make best use of the location's assets and which bring the greatest economic benefits.

Representation

Prop ETG1: Land at former Cockenzie power station does not allow for other uses of the site beyond thermal generation in the life time of NPF3 or until a thermal plant is developed and surplus land identified. This does not accord fully with the aspiration of National Planning Framework 3 for the area.

Rural Policy

9 - Modification

Page 120, paragraph 5.10: change 'Housing permitted in these circumstances will be tied to the business for which it is justified', to:

'Housing permitted in these circumstances may in exceptional circumstances be tied to the business for which it is justified'.

Representation

We refer to and expand upon our comments to an earlier draft of the proposed plan and note that no changes have been made in this regard.

We appreciate that paragraph 5.10 aims to set out the circumstances in which development outwith settlements may be appropriate so is partly in accordance with paragraph 81 of SPP. However, the second part of the paragraph sets out circumstances in which housing will be tied to businesses in every such circumstance. This would appear to require occupancy restrictions, so if this is not the case, this should be clearly explained. If this will require occupancy restrictions, it is contrary to SPP policy which states that occupancy restrictions should be avoided. Given that a policy such as this that requires them in every circumstance it is not considered that this can be considered 'avoiding the use of occupancy restrictions'.

Open Space

10 - Modification

1.47 (Central Scotland Green Network) Change:

"The Central Scotland Green Network is also a National Development which is to extend into East Lothian. It is to help maintain the environmental quality of the area and to promote active travel and healthier lifestyles."

to:

"The Central Scotland Green Network is also a National Development which **extends** into East Lothian. It is to help maintain the environmental quality of the area, **tackle vacant and derelict land** and promote active travel and healthier lifestyles."

Representation

The Central Scotland Green Network (CSGN)has been a national development, since its designation in National Planning Framework 2 in July 2009

<http://www.gov.scot/Publications/2009/07/02105627/0> . The current wording in 1.47 that the

CSGN 'is to extend into East Lothian' implies that it will be extended into the council area at some point in the future, whereas parts of the green network will already be there and linkages and enhancements to the network should already be being considered and acted on. The Scottish Government would expect to see a clearer reflection of the CSGN already being in existence within the Council area.

NPF3 sets out 3 priorities for the CSGN : active travel, tackling vacant and derelict land and disadvantaged communities. We are aware that the CSGN Trust carried out a Review of Vacant and Derelict Sites in the East Lothian Council area (May 2014), which included 18 site reports , covering 17.68ha. Within the sentence about the purpose of the CSGN, we would therefore suggest the addition of reference to tackling vacant and derelict land.

11 - Modification

Open Space Provision: additional wording should be inserted into the plan to encourage opportunities for a range of community growing spaces.

Representation

There is no reference to community growing spaces in the plan. Scottish Planning Policy, paragraph 227, says that plans should encourage opportunities for a range of community growing spaces. The Proposed Plan, whilst making reference to allotments, does not refer to community growing, which includes community gardens, community orchards, community market gardens and community farms. The Scottish Government requests additional wording be inserted into the plan to encourage opportunities for a range of community growing spaces.

Developer Contributions

12 - Modification

Provide details in policy DEL1 or the accompanying text of the broad items for which financial or other contributions will be sought.

Representation

The plan provides a good level of detail on the broad types and locations of contributions. The contribution zones set out details of education, transport and sports facilities contributions and paragraph 8.9 sets out the relevant policies to the developer contributions framework. However, It is not clear whether this covers all the items for which contributions will be sought. This should be clarified in accordance with paragraph 139 of circular 6/2013 which requires items for which financial or other contributions will be sought, to be in the plan itself rather than supplementary guidance.

Protection of Local Sites and Areas

13 - Modification

The wording of the policy be amended – specifically that “public benefits” be replaced with “social, economic or environmental benefits” and that “to the local area” be removed from the second paragraph.

Representation

SPP is clear that the level of protection given to local designations should not be as high as that given to international or national designations. The second paragraph of the policy sets out that “development will only be permitted where it is demonstrated that any damage to the natural heritage interest or public enjoyment of the site is outweighed by the public benefits of the development to the local area and suitable mitigation will be secured”.

There may be instances where a development proposed in such a location would not be necessarily benefit the immediate local area, but could have for example regional or national benefits. Firstly there is also some ambiguity around how “public benefit” would have to be defined. Secondly the wording of the policy could inadvertently prevent development where there is demonstrable benefit either in the local, national or international interest from taking place. There is a need to ensure that the policy provides for a proportionate and balanced consideration to take place on development affecting local sites and areas, better recognising the lower level of protection to be afforded to local sites and areas compared to the policy considerations for national or international sites.

Gardens and Designed Landscapes

14 - Modification:

Remove ‘Government’ from the first sentence of section 6.54 on page 135 and replace with ‘Planning’ so it reads ‘Scottish Planning Policy requires...’

Representation:

Historic Environment Scotland (HES) now takes the lead on Gardens and Designed Landscapes not the SG – see following link <https://www.historicenvironment.scot/advice-and-support/listing-scheduling-and-designations/gardens-and-designed-landscapes/what-is-the-inventory-of-gardens-and-designed-landscapes/>

Active Travel

15 - Modification

We would request that the planning authority identify at least one exemplar walking- and cycling friendly settlement in the Plan.

Representation

Paragraph 5.14 of NPF3 states that we will encourage local authorities to develop at least one exemplar walking- and cycling friendly settlement to demonstrate how active travel networks can be significantly improved.

Housing

16 - Modification

Table HOU2 (Page 67): demolitions and surplus should be shown as negative figures

Representation

Change sought to ensure clarity

17 – Modification

Reference should be made in the plan to how the additional allowance from the SESplan supplementary guidance has been taken into account.

Representation

Change sought to ensure clarity.

Developer Contributions Supplementary Guidance

18 - Modification

Supplementary Guidance. Provide detail on the methodology for defining the contribution zones, or indicate where this is set out and provide detail on how the contribution zone relates to the tests of Circular 3/2012.

Representation

Circular 3/2012 paragraph 14 requires that contributions are only sought where they meet the 5 policy tests. Because the contribution zones are establishing the need for the contribution up front in the development plan, it should be set out how these have been calculated. Particularly important is the 'relationship to the proposed development' test. If this methodology is set out in an accompanying assessment, reference could be made to this. P55 refers to demand projections, but it is not clear where these are contained.

Developer Contributions Supplementary Guidance

19 - Modification

Supplementary Guidance. P47, paragraph 4.15 states that the Council will seek to recover costs for drafting legal agreements from applicants. This reference should be removed.

Representation

There is not clear legal basis for such charges. The Fees Regulations provide for planning fees and charges but do not enable charges of this nature to be made.

Transport Scotland Representation Policy T32: Transport Infrastructure Delivery Fund

SPP sets out the national planning policies which reflect the Scottish Ministers' priorities for the development and use of land. It directly relates to development plans. SPP details on page 10, paragraph 30 that:

“Development Plans should:

- *Be consistent with the policies set out in this SPP*
- *Set out a spatial strategy which is both sustainable and deliverable”*

SPP details on page 63, paragraph 275 that:

“Plans and associated documents, such as supplementary guidance and the action programme, should indicate how new infrastructure or services are to be delivered and phased, and how and by whom any developer contributions will be made. These should be prepared in consultation with all of the parties responsible for approving and delivering the infrastructure.”

The Proposed Plan details within Policy T32 *“A package of transportation interventions to mitigate the cumulative impact of development on the transport network has been identified by the Council in consultation with Transport Scotland. Consistent with Policy DEL1: Infrastructure and Facilities Provision, relevant development proposals will be required to contribute to the delivery of these transportation interventions, on an proportionate, cumulative pro-rata basis, as set out in Developer Contributions Framework Supplementary Guidance. Within this overall Transport Infrastructure Delivery Fund separate funds and accounts will be created, monitored and managed by the Council and Transport Scotland as appropriate for each of the infrastructure projects. Developer contributions will always be used by the Council or Transport Scotland as relevant to deliver the mitigation for which they were originally intended.”*

Transport Scotland has consistently stated to East Lothian Council in both formal and informal consultation that it is the responsibility of the planning authority to identify the nature, scale and cost of mitigation required to support delivery of the proposed Plan allocations. The Planning Authority should then define the required funding mechanism, including who is required to contribute, and the scale of developer contributions; and finally define how, when, and by whom such mitigation will be delivered. Transport Scotland is not responsible for delivering transport improvements required to support the delivery of the LDP spatial strategy unless these are also committed infrastructure schemes within Scottish Government investment programmes. As stated within SPP this is the responsibility of the planning authority, East Lothian Council.

East Lothian Council has developed a Developer Contribution mechanism outlined within Supplementary Guidance accompanying the Proposed Plan, which is referred to within Policy T32. It details the LDP allocations which will have to contribute towards the delivery of infrastructure necessary as a consequence of the cumulative impact of development. The contributions collected by the Council from developers will be used to provide new and improved infrastructure when they are identified as being required. This has been a Council led appraisal in consultation from Transport Scotland. The infrastructure included within the LDP which is required as a consequence of development shall be paid for by developers and delivered by the Council, at present the Policy makes reference to Transport Scotland being involved in this process which should not be the case.

What modifications would you like to see in the Plan?

It is recommended that reference to Transport Scotland being party to the formal creation of, monitoring, or managing of East Lothian Council's Transport Infrastructure Delivery Fund, as currently detailed within Policy T32, is removed.

Representation

DPMTAG Transport Appraisal

East Lothian Council is currently undertaking an appraisal of the Local Development Plan (LDP) land allocations which comprises a strategic traffic modelling exercise utilising the SEStran Regional Model, and S-Paramics micro-simulation modelling to analyse specific junctions on the A1 trunk road. The appraisal will determine the cumulative impacts of the preferred spatial strategy in line with DPMTAG requirements, identifying specific infrastructure required to mitigate impacts and informing a funding mechanism to facilitate delivery of the plan allocations. Transport Scotland has welcomed the opportunity to engage in this appraisal process which we recognise was delayed partly due to the upgrade of the SRM12 taking longer than anticipated, and partly due to the lack of certainty surrounding the Council's preferred spatial strategy.

To date, the full appraisal and associated modelling has not been completed by East Lothian Council. The strategic modelling utilising the SRM has been completed and this has informed the Proposed Plan which includes mitigation measures required at specific locations on the trunk road network including Old Craighall, Bankton, Dolphinstone and Salters Road on the A1. The micro-simulation element of the modelling has not yet been completed. On completion, this will provide more detailed information relating to the nature and scale of mitigation measures required on the A1. The inclusion of this information in the LDP would have enabled the impact of the spatial strategy on the transport network (and therefore the nature and scale of required mitigation measures) to be fully identified which would have provided greater certainty to the development community and stakeholders. The Council is undertaking further appraisal work to provide a greater level of detail on required mitigation measures and are working with all parties to enable a swift completion of this process and review of the outcomes.

While the appraisal exercise has not yet been complete, Transport Scotland has engaged with the Council throughout the appraisal process and while the level of detail included within the Proposed Plan and Action Programme requires further assessment to determine the exact nature of the interventions. The wording of the LDP in this regard states:

PROP T15 Old Craighall A1(T) Junction Improvements states that *“Relevant proposals will contribute to improvements of the roundabout and slip roads, to provide additional network capacity.....The feasibility of delivering this intervention will continue to be investigated...”*; and

PROP T17 A1(T) Interchange Improvements provides details of interventions that are required *“as a minimum”* at Salters Road, Bankton and Dolphinstone interchanges on the A1.

Given the Proposed Plan and Action Programme detail that infrastructure improvements are required, *“as a minimum”*, it is considered that this approach affords the opportunity for additional scale of improvements to be identified and delivered dependent upon the findings of the micro-simulation modelling, and the completion of the full appraisal of the LDP.

East Lothian Council has published Supplementary Guidance on Developer Contributions which defines contribution zones for transport based on the assessment of the cumulative development impact. It is for individual Councils to determine the methodology of any

developer Contribution mechanism. Transport Scotland welcomes the Supplementary Guidance which provides further detail and certainty surrounding the delivery of infrastructure for which the improvements at Salters Road, Bankton and Dolphinstone interchanges on the A1 are included.

What modifications would you like to see in the Plan?

As the outcome of the DPMTAG is not yet available it is not possible at this stage to fully endorse the plan, nor request modifications to it. We would reiterate the importance of this work to understand the impact of the plan.

Representation

PROP T18 Land Safeguard for Trunk Road Interchange at Adniston and Eastern Tranent By-pass

SPP sets out the national planning policies which reflect the Scottish Ministers' priorities for the development and use of land. It directly relates to development plans. SPP details on page 10, paragraph 30 that:

“Development Plans should:

- *Be consistent with the policies set out in this SPP*
- *Set out a spatial strategy which is both sustainable and deliverable”*

PROPT18 Land Safeguard for Trunk Road Interchange at Adniston and Eastern Tranent By-pass states *“land for a potential new trunk road interchange at Adniston and potential eastern Tranent by-pass is safeguarded and the feasibility of delivering these interventions will continue to be investigated....”*

Paragraphs 4.31 to 4.33 and the PROPT18 provide a narrative on the potential access strategy for a new settlement at Blindwells with particular regard to the provision of a new trunk road junction. While it is accepted that the detail provided states that further investigation of such a strategy is required, it should be made clear that, any such strategy will require to be approved by Transport Scotland and be in accordance with paragraph 278 of SPP which details:

“While new junctions on trunk roads are not normally acceptable, the case for a new junction will be considered where the planning authority considers that significant economic growth or regeneration benefits can be demonstrated. New junctions will only be considered if they are designed in accordance with DMRB and where there would be no adverse impact on road safety or operational performance.”

What modifications would you like to see in the Plan

It is recommended that PROPT18 is reworded to align with SPP paragraph 278 and that reference is made to the point that the access strategy will require approval from Transport Scotland.

Representation

Prop BW2 Safeguarded Blindwells Expansion Area

SPP sets out the national planning policies which reflect the Scottish Ministers' priorities for the development and use of land. It directly relates to development plans. SPP details on page 10, paragraph 30 that:

“Development Plans should:

- *Be consistent with the policies set out in this SPP*
- *Set out a spatial strategy which is both sustainable and deliverable”*

SPP details on page 62, paragraph 274 that:

“In preparing development plans, planning authorities are expected to appraise the impact of the spatial strategy and its reasonable alternatives on the transport network, in line with Transport Scotland’s DPMTAG guidance.... Appraisals should be carried out in time to inform the spatial strategy and the strategic environmental assessment. Where there are potential issues for the strategic transport network, the appraisal should be discussed with Transport Scotland at the earliest opportunity.”

Furthermore, paragraph 275 details that:

“Development plans should identify any required new transport infrastructure or public transport services, including cycle and pedestrian routes, trunk road and rail infrastructure. The deliverability of this infrastructure, and by whom it will be delivered, should be key considerations in identifying the preferred and alternative land use strategies.”

The LDP in Policy ‘PROP BW2: Safeguarded Blindwells Expansion Area’ safeguards land for a potential future expansion of the allocated Blindwells site outlined in PROP BW1. Policy PROP BW2 sets out that during the life of the plan, the Council will investigate the potential of developing the future site in conjunction with the allocated site, preparing a Design Framework for both sites to be known together as the Blindwells Expansion Area. The Policy states that:

“The Design Framework will be the basis against which the Council will seek to confirm if a comprehensive solution for the development of that entire area exists.....including in respect of delivery mechanism for the provision and phasing of shared infrastructure as necessary to enable appropriate phasing and timing of development. If a comprehensive solution for the development of the entire area is found, it will be detailed in a Development Brief that would be adopted by the Council as Supplementary Guidance and as part of the Development Plan.

The LDP is required by the SDP to set out specific land requirements up to 2019 and 2024. The current Blindwells allocation (Policy PROP BW1) is detailed in paragraph 3.36 and Table HOU2 as contributing to the land supply post 2019. However paragraph 3.36 continues to states that *“if solutions for a larger new settlement are foundthe SDP would not prevent more housing being developed there in the short or medium term”*.

Transport Scotland is concerned with the above proposals and the terms of Policy PROP BW2. As detailed above SPP outlines the requirements for authorities to appraise their spatial strategy and any alternatives in line with DPMTAG guidance in sufficient time to fully inform the spatial strategy. This requirement enables the Council, Transport Scotland, developers and other key stakeholders to understand the implications of the LDP’s strategy on the strategic and local transport networks and for the suitable identification of mitigation measures and appropriate funding and delivery mechanisms for inclusion within the plan and Supplementary Guidance in accordance with Circular 6/2013.

East Lothian Council is currently undertaking its transport appraisal of the LDP allocations, which has therefore been unable to fully inform the LDP process. The transport appraisal will identify the specific mitigation measures required to fully deliver the LDP spatial strategy. Transport Scotland is currently working with the Council to conclude this exercise, but an agreed outcome has yet to be reached. The transport appraisal work, however, does not include the potential for the full 6000 units at Blindwells beyond the 1600 units currently allocated. Consequently, East Lothian Council has included a policy to investigate the allocation of up to 6000 additional houses with no indication of the potential impact, if the site and any required transport infrastructure can be funded or delivered and by whom, or any

information pertaining to timescales or phasing. Consequently, the addition of 6000 units to the spatial strategy could have significant implications to the strategic road and rail network which have not yet been investigated or identified.

This position is not in accordance with SPP, DPMTAG or Circular 6/2013 which details *“Matters that should not be included in Supplementary Guidance, but be within the plan, include: development proposals of more than local impact.”* In this context we feel that inclusion of such a significant site in Supplementary Guidance, rather than the Plan itself is not appropriate. This presents a significant risk, particularly without any transport modelling (to date) to assess the impact on the surrounding network in conjunction with the rest of the plan, and/or modelling to understand how the progression of this allocation through SG may ultimately affect the progress of sites allocated within the proposed plan (and the appraisal work being undertaken to understand their impact). There is no information on the future expansion of Blindwells relating to potential impact, mitigation, funding or delivery mechanism which goes against the principles of SPP requiring this information to fully inform the plan’s preferred spatial strategy. Leaving the assessment of a large scale development to be initiated subsequent to the publication and adoption of a plan and included within Supplementary Guidance, which has the potential to formally become part of the plan without being subject to Examination, is considered to be unacceptable.

What modifications would you like to see in the Plan

We recommend that Policy PROP BW2 is removed or reworded. Transport Scotland welcomes the Council beginning preparatory work to investigate the viability and deliverability of allocating a further 6000 units at Blindwells. However this work should inform the next LDP, giving sufficient time for an appropriate appraisal of the site and its impact, involving all relevant stakeholders. The potential future expansion of Blindwells is not required to satisfy the housing land requirement for this LDP and it has not been assessed in any capacity to determine its potential impacts on the strategic trunk road and rail network. SPP details that development plans should fully appraise the impact of the spatial strategy in line with DPMTAG guidance which has not been undertaken in this instance and Circular 6/2103 details that proposals of more than local impact should not be left to be included within Supplementary Guidance.

Representation

Policy PROP T10: Safeguarding Land for Platform Lengthening

SPP sets out the national planning policies which reflect the Scottish Ministers’ priorities for the development and use of land. It directly relates to development plans. SPP details on page 10, paragraph 30 that:

“Development Plans should:

- *Be consistent with the policies set out in this SPP*
- *Set out a spatial strategy which is both sustainable and deliverable”*

SPP details on page 63, paragraph 275 that:

“Agreement should be reached with Transport Scotland and Network Rail before rail proposals are included in a development plan or planning application and it should be noted that further technical assessment and design work will be required before any proposed new station can be confirmed as viable.”

The East Lothian Proposed Plan and Action Programme detail within Policy T10 *“Land is safeguarded adjacent to the existing stations at Musselburgh, Wallyford, Prestonpans, Longniddry, Drem and Dunbar to allow additional platform capacity to be provided for longer eight car trains as a minimum, as shown on the Proposals Map. Other than for platform capacity at Dunbar, relevant proposals will be required to contribute to these interventions as*

set out in the Developer Contributions Framework Supplementary Guidance in accord with Policy T32 and Policy DEL1. All proposals will be subject to HRA to ensure that effects on the qualifying interests of the Firth of Forth SPA are avoided during construction.”

East Lothian Council is currently undertaking an appraisal of the Local Development Plan (LDP) land allocations which comprises a strategic traffic modelling exercise utilising the SEStran Regional Model, and S-Paramics micro-simulation modelling. The appraisal will determine the cumulative impacts of the preferred spatial strategy in line with DPMTAG requirements, identifying specific infrastructure required to mitigate impacts and informing a funding mechanism to facilitate delivery of the plan allocations. To date, the full appraisal and associated modelling has not been completed by East Lothian Council, however the strategic modelling element utilising the SRM has been completed and this has informed the Proposed Plan. The Transport Appraisal accompanying the LDP includes mitigation measures required at specific locations as a result of the cumulative impacts of development, including identifying the need for platform extensions at Musselburgh, Wallyford, Prestonpans, Longniddry, Drem and Dunbar as a result of the residential and employment developments which would result in a considerable number of additional rail trips, putting pressure on train capacities.

Transport Scotland has been consulted on the development of the LDP and transport appraisal, previously requesting further information relating to the rationale for longer platforms given that a new 6 car service has recently been introduced. To date no evidence has been provided to Transport Scotland to demonstrate that consideration has been given to a range of potential operational solutions which has led to a conclusion that platform extensions are required to accommodate longer trains. Currently, trains on the route use Selective Door Opening (SDO) where platforms are shorter than the train length. We have not been made aware of any work undertaken to determine if, along with platform lengthening, there would be additional requirement for extension/expansion of other passenger facilities (such as ticket machines). Furthermore we haven't seen consideration on the requirement for additional rolling stock, including assessment of whether the current railway line and/or rolling stock is suitable for 8 car running.

What modifications would you like to see in the Plan

Transport Scotland do not consider there is currently a requirement for platform lengthening at Musselburgh, Wallyford, Prestonpans, Longniddry and Drem. Therefore, it is recommended that Policy T10 is removed or reworded to detail that upgrades to the stations may be required as a result of development proposals, the details of which will be determined through further study in consultation with Transport Scotland and Network Rail.

Your sincerely

Jane Tennant
Graduate Planner

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on 2016-11-04 10:12:01

About You

1 What is your name?

First name:

Alex

Surname:

Brougham

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4 Please enter your postcode

Postcode:

[REDACTED]

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

Local resident/member of the public

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

Organisation:

N/A

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::

I OBJECT STRONGLY to the inclusion of the proposed housing developments at SALTCOATS (NK7), FENTON GAIT EAST (NK8) and FENTON GAIT SOUTH (NK9) in the proposed Local Development Plan and REQUEST STRONGLY that they are removed.

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):

The proposed housing development at the FORMER FIRE TRAINING SCHOOL (NK6) provides an excellent opportunity for the provision of additional housing in Gullane that is proportionate to the level of community and other services within the area. Swift development of this site will also ensure that this area of outstanding natural beauty is not blighted with a large derelict brownfield site, as happened for a number of years with the local hotel site.

However, the inclusion of the three other proposed housing developments at the greenfield sites at SALTCOATS (NK7), FENTON GAIT EAST (NK8) and FENTON GAIT SOUTH (NK9) is totally out of proportion and will have a devastating effect on the local landscape and the local community. The cumulative effect

of all four proposed developments, increasing the village by 30%, is disproportionate to the existing infrastructure affecting roads, public transport, schools, medical and other services and employment opportunities.

Road access to the proposed sites via West Fenton (C111) is already extremely limited and narrow, with small bridges over Peffer and Mill Burns; parking and road safety is already an issue in Gullane and West Fenton and public transport to Edinburgh is extremely limited. There is no safe access to rail at Drem, as parking is at capacity and the longstanding proposal for a path from Gullane continues to be blocked, making it extremely dangerous to cycle or walk to the station. School, medical and other community services are already at capacity and the promise of two additional classrooms is clearly inadequate to support the proposed developments, which in total are likely to bring nearly 400 more school children into the area.

The cumulative effect of developing three greenfield sites in such a concentrated area will reduce local employment through the removal of prime agricultural land and the reduced attraction of the area for tourism, particularly horse-riding, walking, cycling, bird watching and golf. It will also reduce significantly the local habitat supporting East Lothian's renowned animal and birdlife, including deer, hares and migratory birds such as the pink footed goose, all of which are seen on the land proposed for development.

Given the scale of the proposed development in such a small area, which would result in the village growing by nearly a third, there will also be significant disruption to the local community over a very long period.

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

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

I OBJECT STRONGLY to the inclusion of the proposed housing development at SALTCOATS (NK7) in the proposed Local Development Plan and REQUEST STRONGLY that it is removed.

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):

This proposed development will have significant negative implications for Gullane, West Fenton, Drem and surrounding areas, as follows:

- Over development disproportionate to the existing infrastructure affecting roads, public transport, schools, medical and other services and employment opportunities. Road access via West Fenton is extremely limited and narrow, with small bridges over Peffer and Mill Burns; parking and road safety is already an issue in Gullane and West Fenton and this will be exacerbated by the increased car usage; public transport to Edinburgh is extremely limited, with no safe access to rail at Drem, as parking is at capacity and the longstanding proposal for a path from Gullane continues to be blocked; Gullane school is already at capacity, as are medical and other services.
- The irreversible development of prime agricultural land, which is one of East Lothian's greatest assets and which provides local employment.
- The reduction in greenfield land, which will reduce the area's attraction for tourism, particularly horse-riding, walking, cycling, bird watching and golf, all of which also provide local employment.
- The reduction in and effect on the local habitat supporting East Lothian's renowned animal and birdlife, including deer, hares and migratory birds such as the pink footed goose, all of which are seen on the land proposed for development.
- The development of unaffordable housing of a size that is not needed – as is clear from the number of larger properties in the village that are not selling at the moment.
- The potential risk that development of the brownfield site at the Fire School will be delayed, resulting in another significant derelict site in the village just as the old hotel site has finally been developed after many years standing derelict.
- The length of time required for development, resulting in long term disruption to the local community.

In conclusion, I see no benefits in the proposed development of land at SALTCOATS (NK7) and believe strongly that the focus should be on a proportional development of the nearby brownfield site at the FORMER FIRE TRAINING SCHOOL (NK6).

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:

I OBJECT STRONGLY to the inclusion of the proposed housing development at FENTON GAIT EAST (NK8) in the proposed Local Development Plan and REQUEST STRONGLY that it is removed.

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):

This proposed development will have significant negative implications for Gullane, West Fenton, Drem and surrounding areas, as follows:

- Over development disproportionate to the existing infrastructure affecting roads, public transport, schools, medical and other services and employment opportunities. Road access via West Fenton is extremely limited and narrow, with small bridges over Peffer and Mill Burns; parking and road safety is already an issue in Gullane and West Fenton and this will be exacerbated by the increased car usage; public transport to Edinburgh is extremely limited, with no safe access to rail at Drem, as parking is at capacity and the longstanding proposal for a path from Gullane continues to be blocked; Gullane school is already at capacity, as are medical and other services.

- The irreversible development of prime agricultural land, which is one of East Lothian's greatest assets and which provides local employment.
- The reduction in greenfield land, which will reduce the area's attraction for tourism, particularly horse-riding, walking, cycling, bird watching and golf, all of which also provide local employment.
- The reduction in and effect on the local habitat supporting East Lothian's renowned animal and birdlife, including deer, hares and migratory birds such as the pink footed goose, all of which are seen on the land proposed for development.
- The development of unaffordable housing of a size that is not needed – as is clear from the number of larger properties in the village that are not selling at the moment.
- The potential risk that development of the brownfield site at the Fire School will be delayed, resulting in another significant derelict site in the village just as the old hotel site has finally been developed after many years standing derelict.
- The length of time required for development, resulting in long term disruption to the local community.

In conclusion, I see no benefits in the proposed development at FENTON GAIT EAST (NK8) and believe strongly that the focus should be on a proportional development of the nearby brownfield site at the FORMER FIRE TRAINING SCHOOL (NK6).

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:

I OBJECT STRONGLY to the inclusion of the proposed housing development at FENTON GAIT SOUTH (NK9) in the proposed Local Development Plan and REQUEST STRONGLY that it is removed.

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) :

This proposed development will have significant negative implications for Gullane, West Fenton, Drem and surrounding areas, as follows:

- Over development disproportionate to the existing infrastructure affecting roads, public transport, schools, medical and other services and employment opportunities. Road access via West Fenton is extremely limited and narrow, with small bridges over Peffer and Mill Burns; parking and road safety is already an issue in Gullane and West Fenton and this will be exacerbated by the increased car usage; public transport to Edinburgh is extremely limited, with no safe access to rail at Drem, as parking is at capacity and the longstanding proposal for a path from Gullane continues to be blocked; Gullane school is already at capacity, as are medical and other services.
- The irreversible development of prime agricultural land, which is one of East Lothian's greatest assets and which provides local employment.
- The reduction in greenfield land, which will reduce the area's attraction for tourism, particularly horse-riding, walking, cycling, bird watching and golf, all of which also provide local employment.
- The reduction in and effect on the local habitat supporting East Lothian's renowned animal and birdlife, including deer, hares and migratory birds such as the pink footed goose, all of which are seen on the land proposed for development.
- The development of unaffordable housing of a size that is not needed – as is clear from the number of larger properties in the village that are not selling at the moment.
- The potential risk that development of the brownfield site at the Fire School will be delayed, resulting in another significant derelict site in the village just as the old hotel site has finally been developed after many years standing derelict.
- The length of time required for development, resulting in long term disruption to the local community.

In conclusion, I see no benefits in the proposed development at FENTON GAIT SOUTH (NK9) and believe strongly that the focus should be on a proportional development of the nearby brownfield site at the FORMER FIRE TRAINING SCHOOL (NK6).

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) :

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-04 10:45:50**

About You

1 What is your name?

First name:

Grant

Surname:

Young

2 What is your email address?

Email address:

3 Postal Address

Address:

Suite 29
196 Rose Street
Edinburgh

4 Please enter your postcode

Postcode:

EH2 4AT

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

Developer/ agent/ landowner

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

Organisation:

Scottish Power Generation c/o Young Planning and Energy Consenting

Your role:

Planning consultant acting on behalf of landowner

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::

SPG's proposed amendments to this section of the Proposed LDP should be read alongside proposed amendments to other sections of the Proposed LDP, as part of a wider representation to the Plan.

(a) Paragraph 1.36: Insert new 4th sentence (after sentence ending "...former power station site." as follows: "NPF3 also recognises the potential of the former power station site for renewable energy and energy-related ports development, whilst in considering the potential for conflicting uses, seeks to promote development which maximises the site's economic development potential."

(b) Paragraph 1.46: No proposed change, SPG endorses the Council's interpretation of NPF3's national development designation and associated policy as it relates to the former Cockenzie Power Station site. SPG reserves the right to make further representations in the event of third parties proposing amendments to this paragraph as it relates to SPG assets.

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):

SPG's proposed amendments to this section of the Proposed LDP should be read alongside proposed amendments to other sections of the Proposed LDP, as part of a wider representation to the Plan.

(a) Paragraph 1.36: The proposed amendment better reflects the planning policy status of the former Cockenzie Power Station site. The existing drafting does not adequately reflect NPF3's position on the site. The proposed amendment provides a more accurate context to the planning basis afforded to energy infrastructure within East Lothian and is consistent with the approach adopted by the Council in providing more detail at paragraph 1.46.

(b) Paragraph 1.46: No proposed change since the paragraph reflects the position of NPF3. No further justification required.

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:

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):

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:

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):

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:

SPG's proposed amendments to this section of the Proposed LDP should be read alongside proposed amendments to other sections of the Proposed LDP, as part of a wider representation to the Plan.

PROP MH18: Levenhall Links to Prestonpans: Area for Habitat Improvements – No changes proposed, SPG supports the proposal which largely relates to the area of former ash lagoons associated with the former Cockenzie Power Station site. SPG reserves the right to make further representations in the event of third parties proposing amendments to this proposal as it relates to SPG assets.

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):

No proposed change, no justification required.

Additional Information :

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

1a What modifications do you wish to see made to the Strategy map for the Prestonpans/Cockenzie/Port Seton/Longniddry Cluster? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question. Do you have any comments to make on the

Modifications(s) Sought :

SPG's proposed amendments to this section of the Proposed LDP should be read alongside proposed amendments to other sections of the Proposed LDP, as part of a wider representation to the Plan.

EGT1: No changes proposed, SPG supports the proposal which largely relates to the area of former operational Cockenzie Power Station site and adjacent SPG assets. SPG reserves the right to make further representations in the event of third parties proposing amendments to this proposal as it relates to SPG assets. The Proposed LDP should ensure that the EGT1 allocation is not prejudiced through incompatible development on neighbouring land.

SPG acknowledges that the EGT1 boundary incorporates a section of the Greenhills which is recognised as public space. SPG considers this area to be key for infrastructure to support the development of the main site which is consistent with the corresponding proposal (PROP EGT1: Land at Former Cockenzie Power Station), which promotes the use of Supplementary Guidance in the event of baseload generation development not being forthcoming on the site, a position supported by SPG.

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

Justification for Modification(s) :

No proposed change, no justification required.

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

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

Modifications(s) Sought:

SPG's proposed amendments to this section of the Proposed LDP should be read alongside proposed amendments to other sections of the Proposed LDP, as part of a wider representation to the Plan.

Paragraph 2.51: Delete sentence: "To avoid prejudicing...reviewed in any revision of NPF3."

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

Justification for Modification(s):

SPG's proposed amendments to this section of the Proposed LDP should be read alongside proposed amendments to other sections of the Proposed LDP, as part of a wider representation to the Plan.

Paragraph 2.51: The sentence which is proposed for deletion misrepresents the position of NPF3 in suggesting that proposals for development other than that covered by the national development designation cannot be supported. Indeed, NPF3 considers that possibility, in stating at page 39 that the Cockenzie site:

"...may present significant opportunities for renewable energy-related investment. We expect developers, East Lothian Council and their key agencies, including Scottish Enterprise to work together to ensure that best use is made of the existing land and infrastructure in this area. Given the particular assets of Cockenzie, if there is insufficient land for competing proposals, we wish to see priority given to those which make best use of this location's assets and which will bring the greatest economic benefits."

To resist proposals for development other than that which is specifically compliant with national development number three would be inconsistent with NPF3's more general aspiration that the economic potential of the site be realised, and would risk the non-delivery of development consistent with such aspirations and which could contribute positively on both micro and macro levels.

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

1a PROP PS1: Longniddry South - What modifications do you wish to see made to Prop PS1 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.

Modification(s) Sought:

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1b Please give any information/reasons in support of each modification suggested to Prop PS1 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

2a PROP PS2: Land at Dolphingstone North, Prestonpans - What modifications do you wish to see made to Prop PS2 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 Prop PS2 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

3a Policy PS3: Development Briefs - What modifications do you wish to see made to Policy PS3 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:

SPG's proposed amendments to this section of the Proposed LDP should be read alongside proposed amendments to other sections of the Proposed LDP, as part of a wider representation to the Plan.

Policy PS3: Development Briefs: Clarification required over the applicability or otherwise of Policy PS3 in respect of Proposal EGT1; PS3 refers to "...all allocated sites..." and whilst EGT1 is referenced within the Spatial Strategy for the Prestonpans/Cockenzie/Port Seton/Longniddry Cluster, it is not referenced within the supporting text.

Paragraph 2.64: Clarification of the statement that "The Council has adopted as supplementary planning guidance development briefs for the allocated sites..." is required – EGT1 is an allocated site within the Prestonpans/Cockenzie/Port Seton/Longniddry Cluster but no development brief for the site has been prepared. The aforementioned statement may be intended to relate to the sites mentioned within Table PS1.

3b Please give any information/reasons in support of each modification suggested to Policy PS3 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

SPG's proposed amendments to this section of the Proposed LDP should be read alongside proposed amendments to other sections of the Proposed LDP, as part of a wider representation to the Plan.

Existing drafting is unclear and ambiguity could result in confusion in the event of Supplementary Guidance and/or planning applications being forthcoming in respect of EGT1.

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

1a General Urban Development Policies - What modifications do you wish to see made to this 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 General Urban Development Policies 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 Planning for Employment - What modifications do you wish to see made to the Planning for Employment 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:

SPG's proposed amendments to this section of the Proposed LDP should be read alongside proposed amendments to other sections of the Proposed LDP, as part of a wider representation to the Plan.

(a) Table EMP1: Employment Sites and Proposals by Cluster Area: Within the Prestonpans Cluster Area section of Table EMP1, include reference to Land at Former Cockenzie Power Station, as follows:

- Proposal Ref: EGT1
- Site Name: Land at Former Cockenzie Power Station
- Operational Land: 28 hectares
- Undeveloped Sites: 49 hectares

- New Allocations: 77 hectares
 - Development Brief: No
 - Comments: To be supported for development which maximises the economic benefits of the site and which makes appropriate use of the sites assets, in the event of there being no forthcoming proposals for development consistent with NPF3's national development number 3
 - Policy/Proposal Applying to Site: EMP1/EGT1
- Totals for Prestonpans Cluster Area to be updated: 83.5 hectares

(b) Paragraphs 3.25/3.26: Include new paragraph 3.26 in between existing paragraphs 3.25 and 3.26, as follows: "Proposal EGT1: Land at Former Cockenzie Power Station is included as an employment proposal. Proposals which maximise the economic benefits of the site and which make appropriate use of the sites assets will be supported in the event of there being no forthcoming proposals for development consistent with NPF3's national development number 3."

(c) New section and policy required, between Employment Locations and Operational Harbours, entitled Employment Proposals on Unallocated Sites, setting out the criteria against which development proposals for employment development on sites which are not allocated for such use, will be assessed. This is particularly relevant in the event of SPG's proposed amendments set out in (a) and (b), above, are not accepted.

2b Please give any information/reasons in support of each modification suggested to the Planning for Employment 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):

SPG's proposed amendments to this section of the Proposed LDP should be read alongside proposed amendments to other sections of the Proposed LDP, as part of a wider representation to the Plan.

(a) NPF3 includes support for development at the former Cockenzie Power Station site which "...make(s) best use of this location's assets and which will bring the greatest economic benefits". NPF3 would support such development in the event of no proposals for baseload energy generation, consistent with national development number 3, being forthcoming. Use of the term "greatest economic benefits" suggests support for employment generating use(s), which seem a most likely alternative to electricity generating use of the site. As such, the site should be included as a potential employment site. Such inclusion would significantly benefit East Lothian's employment land bank, in both quantitative terms, through the addition of 77 hectares of developable land, and in qualitative terms through the addition of a unique site accessible by road, rail and sea.

Without such allocation of the site, there exists no policy basis for the delivery of NPF3's wider aspirations for the former Cockenzie Power Station site.

(b) To reflect the change proposed in (a).

(c) In order to provide clarity on the criteria for which such development will be assessed. In the context of NPF3's support for development at the Former Cockenzie Power Station for development which maximises the economic benefits of the site and makes best use of the site's assets, for example, the existing drafting of the Proposed LDP provides no clarity as to how proposals for such development should be assessed.

Whilst SPG contends at (a) and (b), above, that the site should be covered by the LDP's employment land designations, the additional section Employment Proposals on Unallocated Sites would be particularly essential in the event of amendments (a) and (b) not being accepted. Indeed, even if (a) and (b) are accepted, there would remain an absence assessment criteria for employment proposals on unallocated sites and the amendments remains necessary.

3a Tourism - What modifications do you wish to see made to the Tourism 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 Tourism 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:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

SPG's proposed amendments to this section of the Proposed LDP should be read alongside proposed amendments to other sections of the Proposed LDP, as part of a wider representation to the Plan.

(a) Paragraph 4.88: No proposed change, SPG endorses the Council's interpretation of NPF3's national development designation and associated policy as it relates to the former Cockenzie Power Station site. SPG reserves the right to make further representations in the event of third parties proposing amendments to this paragraph as it relates to SPG assets.

(b) Paragraph 4.92: From "In such circumstances..." onwards, amend paragraph 4.92 to read as follows:

"Notwithstanding, the existing drafting of NPF3 recognises that the Cockenzie site:

"...may present significant opportunities for renewable energy-related investment. We expect developers, East Lothian Council and they key agencies, including Scottish Enterprise to work together to ensure that best use is made of the existing land and infrastructure in this area. Given the particular assets of Cockenzie, if there is insufficient land for competing proposals, we wish to see priority given to those which make best use of this location's assets and which will bring the greatest economic benefits."

In such circumstances it would be appropriate for the Council to prepare Supplementary Guidance (in accordance with Policy PS3: Development Briefs) during the lifetime of this Plan to guide the redevelopment of the site for other purposes, in consultation with landowners, stakeholders and the community. It would also be appropriate to prepare Supplementary Guidance in the event that a thermal power generation proposal is implemented on the site during the lifetime of this Plan to address the redevelopment of any surplus land."

(c) Paragraph 4.93: Amend second sentence to read as follows: "These assets will be considered as part of the aforementioned Supplementary Guidance for the wider EGT1 site, however, the Council would wish to resist built development that would adversely affect these assets."

(d) PROP EGT1: Land at Former Cockenzie Power Station: Should be amended to read as follows:

"(a) The site of the former Cockenzie Power Station is safeguarded as a site for future thermal power generation and Carbon Capture and Storage, consistent with 'National Development 3' in the Scottish Government's National Planning Framework 3. The Council will support, in principle, development consistent with National Development 3.

(b) Alternatively, NPF3 recognises: (i) the site's potential for renewable energy-related investment; and (ii) development which makes best use of the locational assets and which will bring the greatest economic benefits. In the event of there being no proposals for development consistent with National Development 3, proposals for development consistent with (i) and/or (ii) will be supported, in principle and in accordance with Policy EMP1, by the Council.

(c) In the event that the National Planning Framework is updated or replaced during the lifetime of this Plan, the Council will support, in principle, proposals for development which are consistent with the updated NPF.

(d) Any proposals forthcoming for the site will be expected to: (i) be considered through Supplementary Guidance prepared in accordance with Policy PS3: Development Briefs; (ii) make best use of the location's assets and bring significant economic benefits; and (iii) be subject to a Habitats Regulations Appraisal and, if necessary, an Appropriate Assessment under the Habitats Regulations."

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):

SPG's proposed amendments to this section of the Proposed LDP should be read alongside proposed amendments to other sections of the Proposed LDP, as

part of a wider representation to the Plan.

(a) Paragraph 4.88: No proposed change since the paragraph reflects the position of NPF3. No further justification required.

(b) Paragraph 4.92: To accurately reflect NPF3's position on the Cockenzie site, as well as clarifying the relationship between the Supplementary Guidance referenced within Paragraph 4.92 and Policy PS3: Development Briefs.

(c) Paragraph 4.93: To reflect the significance of these areas as part of the wider EGT1 site and to promote comprehensive future planning of the area.

(d) PROP EGT1: Land at Former Cockenzie Power Station: To accurately reflect NPF3's position on the Cockenzie site, as well as providing safeguards against inappropriate development which are consistent with the original drafting of PROP EGT1.

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):

Section 6b - Our Cultural Heritage (pages 133-136)

1a Development Affecting Listed Buildings - What modifications do you wish to see made to Affecting Listed Buildings 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 Development Affecting Listed 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) :

2a Development Affecting Conservation Areas - What modifications do you wish to see made to the Development Affecting Conservation 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:

2b Please give any information/reasons in support of each modification suggested to the Development Affecting Conservation 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):

3a Development Affecting Scheduled Monuments and Archaeological Sites - What modifications do you wish to see made to the Development Affecting Scheduled Monuments and Archaeological 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:

3b Please give any information/reasons in support of each modification suggested to the Development Affecting Scheduled Monuments and Archaeological 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):

4a Development Affecting Gardens and Designed Landscapes - What modifications do you wish to see made to the Development Affecting Gardens and Designed Landscapes 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 Development Affecting Gardens and Designed Landscapes 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 Area Based Cultural Heritage Policies - What modifications do you wish to see made to the Area Based Cultural Heritage Policies 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:

SPG's proposed amendments to this section of the Proposed LDP should be read alongside proposed amendments to other sections of the Proposed LDP, as part of a wider representation to the Plan.

Policy CH5: Battlefields – No changes proposed. SPG reserves the right to make further representations in the event of third parties proposing amendments to this policy which might impact upon SPG assets.

5b Please give any information/reasons in support of each modification suggested to the Area Based Cultural Heritage Policies 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):

No proposed change, no justification required.

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:

SPG's proposed amendments to this section of the Proposed LDP should be read alongside proposed amendments to other sections of the Proposed LDP, as part of a wider representation to the Plan.

EGT1: No changes proposed, SPG supports the proposal which largely relates to the area of former operational Cockenzie Power Station site and adjacent SPG assets. SPG reserves the right to make further representations in the event of third parties proposing amendments to this proposal as it relates to SPG assets.

SPG acknowledges that the EGT1 boundary incorporates a section of the Greenhills which is recognised as public space. SPG considers this area to be key for infrastructure to support the development of the main site which is consistent with the corresponding proposal (PROP EGT1: Land at Former Cockenzie Power Station), which promotes the use of Supplementary Guidance in the event of baseload generation development not being forthcoming on the site, a position supported by SPG.

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) :

No proposed change, no justification required.

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Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-04 11:31:40**

About You

1 What is your name?

First name:

Gladman Developments Ltd.

Surname:

Gladman Developments Ltd.

2 What is your email address?

Email address:

3 Postal Address

Address:

Gladman Scotland
2 Eliburn Office Park
Livingston
West Lothian

4 Please enter your postcode

Postcode:

EH54 6GR

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

Developer/ agent/ landowner

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

Organisation:

Gladman Developments Ltd

Your role:

Strategic Land Promotion

7 Are you supporting the plan?

Not Answered

If Yes: Please include your reasons for support:

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

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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 should set out the housing land requirement for the period of ten years from the expected year of adoption of the plan (2018-2028).

Re-wording of paragraph 3.34 to remove negative references to the rate of delivery of housing, or if remaining, include additional text to show how the LDP will work to overcome this potential issue in order to meet targets, preferably by allocating a larger number and range of sites.

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):**

In accordance with SPP Para. 119.

It is recognised that some matters in delivery of housing are outwith the control of the planning authority, however they are under obligation to facilitate many of the key factors of delivery included providing a generous supply of effective housing land at all times, and ensuring these sites have consent - these matters cannot be considered as unrelated to the LDP or its Action Programme.

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:**

Use of 2016 HLA as a baseline.

Table HOU1: Introduction of a substantial number of additional housing proposals and safeguarded sites.

Table HOU2: Introduction of additional New Allocations, to result in an increased % generosity in the housing land supply.

Table HOU2: full re-appraisal of the level and timing of delivery of new allocations.

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

We would question the reliance upon the established housing land supply as set out in the Housing Land Audit of 2015. A much more up to date picture would be reflected in the 2016 Audit, which should form the starting point for the LDP figures moving forward.

East Lothian Council currently face a recognised shortfall in their housing land supply at approximately 66% (3.32 years) using the 2015 Housing Land Audit, on which the Proposed LDP is based. We understand figures for the Draft 2016 HLA are unavailable at this time.

In order to adequately deal with this existing and ongoing shortfall, and to adequately plan ahead, the proposed 23% generosity does not, in our view, go far enough. The focus should be on effective sites, deliverable within the plan period, in order to ensure delivery in the shortest possible timescale, as large a range of these sites should be included as possible.

Failing that, the Council should consider the option of providing for additional housing opportunity or a greater range of safeguarded sites, that can be brought forward for consideration in the event of a shortfall.

In Table HOU2, the anticipated contribution from new allocations seems highly ambitious given that many sites do not yet have planning permission and are expected to deliver a significant number units by 2019. These allocations need to be fully appraised and the necessary adjustments made - ie introduction of more allocations to make up the shortfall.

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: In our view the plan does not go far enough to ensure an effective five year housing land supply at all times, partly through reliance on larger scale developments that require significant investment, with associated timing implications. As such there is a need to allocate a range of short term, effective sites.

The focus should be on LDP means of delivering sites, rather than challenges.

Introduction of additional housing opportunity sites and safeguarded sites.

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):**

Additional allocations are required as per previous and attached submissions.

Safeguarded sites would become available for consideration in the event of a shortfall in the HLS, in order to ensure the ongoing delivery of appropriate sites at all times.

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:

Gladman does not support the introduction of Countryside Around Town designations.

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):

As per our previous submissions :

The designation is an inappropriate means of restricting SDP Policy 7, and adds another layer of policy protection to areas already subject to appropriate control (eg DC1).

Therefore the policy only serves to further restrict the delivery of housing by unduly restricting development.

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

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

Modifications(s) Sought:

Whilst developer contributions are recognised as justified when fairly and reasonably relate in scale and kind to the proposed development (Circular 3/12), they should not be sought in order to offset existing issues.

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

Justification for Modification(s):

For example; the introductory section of the plan (para. 1.33) suggests existing capacity issues in the transport network are as a result of the cumulative impact of population growth in, and commuting through and from the area.

Developer contributions should not be sought in order to offset existing capacity issues created as a result of cumulative impact,

Response ID ANON-ZMS3-3MJQ-8Submitted to **East Lothian Proposed Local Development Plan**Submitted on **2016-11-04 12:07:05****About You****1 What is your name?****First name:**

Tony

Surname:

Thomas

2 What is your email address?**Email address:**

[REDACTED]

3 Postal Address**Address:**

apt planning & development ltd.

6 High Street

East Linton

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 CALA Management Ltd.

Your role:

Consultant to CALA

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 1 - Introduction (pages 1-10)

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

Modification(s) sought::

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

Justification for Modification(s):**Section 2 - A Spatial Strategy for East Lothian (pages 11-14)**

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

Modifications(s) sought:

2.11 Into the longer term, environmental and infrastructure constraints in the west of East Lothian are expected to result from the implementation of the compact spatial strategy. 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. Confirmation of any longer term spatial strategy will be dependent on the scale and nature of any future strategic development requirements. Notwithstanding this, land has been safeguarded at Drem area by this LDP so as not to prejudice the Council's future consideration of its future development potential. Investors may choose to explore with service and infrastructure providers if and how such safeguarded land may be developed in future should there be a need.

Consequently we would propose suggest adding site 68. Drem Safeguard to the Main Strategy Diagram, List of Main Proposals.

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):

We believe that Drem should be identified as a potential medium-long term safeguard for future housing land.

Both the emerging SESPlan 2 and this plan at 2.11 acknowledge the need to consider a new settlement in the east of East Lothian to meet future housing land supply targets. Both here and at 3.37 reference is made to land that has been safeguarded for future development.

Only Blindwells has been safeguarded. It is not credible to consider Blindwells as being in the east of East Lothian, it will be close to Prestonpans and Tranent and very much still to the west of East Lothian.

Perhaps more pertinently, there is far too much uncertainty over its immediate and long term potential to rely on Blindwells as the alternative and/or long-term solution.

Drem provides a credible and well-located alternative both to consider for longer term housing land provision as well as an appropriate back-up should the proposed LDP housing land delivery strategy fail to deliver the requisite number of new homes.

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:

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):

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:

PROP MH8: Levenhall, Musselburgh

Land at Levenhall is allocated for a residential development of circa 50 homes.

A comprehensive masterplan for the entire allocated site. Any development here is subject to the mitigation of any development related impacts, including on a proportionate basis for any cumulative impacts with other proposals including on the transport network, on education and community facilities, and on air quality as appropriate

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):

CALA continues to support this allocation and having prepared and now lodged a full planning application for the site, we are able to comment on detailed elements of the site. As such we believe that the indicative capacity of the site should be reduced to circa 50 units and we have made further comments with regards to the Draft Development Brief in the appropriate section of the consultation.

The physical and technical constraints of the site have reduced the developable area available whilst the local housing market has an under-supply of larger family homes. In accord with local and national policy, it is important to provide a full range and choice of housing to support placemaking and balanced communities. This combination indicates a site capacity of circa 50 units.

The detailed layout submitted with the a planning application has been widely consulted on during the pre-application stage. As such we believe that the application represents a well-designed and credible response to the site characteristics, opportunities and constraints.

We have attached the latest layout for the Levenhall site as per the planning application. Whilst it does not necessarily represent the final layout, it does represent the outcome of a technical and design process, widely consulted on showing just under 50 units.

We have removed reference to the Development Brief for MH8 as the development brief in its current form cannot be implemented. Reference to it should be omitted until a more inclusive and credible process has been undertaken to finalise the briefs.

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:

Policy MH17: Site Masterplans

As part of any planning application for any allocated site, comprehensive masterplan solutions for the entire allocated site must be submitted.

Proposed masterplans must demonstrate how the relevant objectives for the allocated site will be secured, how development will be delivered on an appropriate phased basis, and set out design requirements to ensure the development will properly integrate with its surroundings and the character of the local area.

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):

We have removed reference to the Development Briefs and altered the title of MH17. The draft development briefs in their current form are not fit-for-purpose.

There has been no engagement with landowners, developers (where known) or council colleagues where they may have had up to date knowledge of the proposals for the sites. The development briefs do not accurately reflect the physical, technical or economic characteristics of the sites. In many cases, the briefs stipulate requirements over third party land which cannot be delivered.

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 :

apt017 - LEVENHALL - Proposal MH8 - Site Layout Plan.pdf was uploaded

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

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

Modifications(s) Sought:

Add Drem Safeguard area (and as per the attached Indicative Development Strategy)

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

Justification for Modification(s):

In line with representations made to this Proposed LDP, the proposed Drem Safeguard should be shown on the North Berwick Cluster Map either as previously shown in the MIR or a more specific land area as appropriate.

CALA believes that the future expansion of Drem can play a critical roll in East Lothian meeting housing delivery targets, at an appropriate location (within the SDA) and with an ability to provide a wide range of house types and tenures alongside community and business facilities (and the provision of a new primary school).

The development of a new settlement in the east of East Lothian is referenced at Paragraph 3.13 of the emerging SESPlan 2 as well as paragraphs 2.11 and 2.154 in the Proposed LDP. SESPlan2 also identifies future housing land requirement to deliver an additional 10,000 new homes to 2038 and this assumes the delivery of all new homes in line with the strategy identified in this LDP.

Whilst the LDP has identified sufficient land for development in this LDP cycle, there are sites constrained by physical, environmental and market factors that could undermine the delivery of this strategy and leave East Lothian exposed to a number of less-desirable sites being granted planning permission through the appeal process.

If an alternative strategy (a 'Plan B') has already been agreed should the allocated sites fail to deliver the requisite number of new homes, then East Lothian Council can be seen to addressing these concerns appropriately and proactively. This Proposed LDP makes reference to safeguarded land (paragraphs 2.11 & 3.37) but this only applies to Blindwells. Given its location in the west of the County and the uncertainty over its delivery, East Lothian should seek an additional and/or alternative safeguard to ensure it can react to medium and long term housing land shortfalls.

The expansion of Drem can be achieved in a controlled and phased delivery of up to 2,000 new homes delivering the full range of house types and tenures at a location that can be developed with relatively little landscape impact. Drem would provide an alternative location for those currently priced out of the east of East Lothian market due to high demand and relatively low supply, whilst the potential to create a new location for new or relocated businesses would help reduce the need to commute and ensure that East Lothian residents are encouraged and able to live and work in the County.

As stated above, Drem is located within the East Lothian SDA as set by SESplan. It is also located on a Strategic Growth Corridor as identified in SESplan2 Proposed Plan. The suitability of this location for strategic growth is clearly supported in the SDP.

We have provided further supporting information and wish to see the land to the north of Drem Station identified for potential future development as outlined above.

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

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

Modifications(s) Sought:

Paragraph 2.154

Drem is within the SDA and benefits from a railway station on the East Coast Main Line, but this is served only by local train services. It also has very limited public transport accessibility by other modes, and very limited facilities. The local road network at Drem is currently inadequate for significant growth.

However, in the medium to long term, or in response to the failure of other allocated sites to deliver sufficient new homes in East Lothian, a significant scale of mixed use development at Drem presents an opportunity for road realignment and the relocation of Drem station. This would sufficiently enhance the road and rail network and facilitate significant enhancement of access to public transport, all of which supports strategic growth. Consequently, land at Drem is Safeguarded for future major development and subject to further studies and consideration of housing market pressures.

We are aware of landowner support for the phased expansion of Drem which could deliver enhanced railway station services (park and ride) as well as providing the necessary primary education solution. The future expansion of Drem would also have the capacity and critical mass to provide a wide range of house types and tenures alongside community facilities and mixed employment opportunities.

Future development of Drem would also be site on relatively low-lying land utilising the existing gentle slopes of the Peffer Burn valley meaning it could be delivered with relatively low landscape impact.

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

Justification for Modification(s):

CALA believes that the future expansion of Drem can play a critical roll in East Lothian meeting housing delivery targets, at an appropriate location (within the SDA) and with an ability to provide a wide range of house types and tenures alongside community and business facilities (and the provision of a new primary school).

The development of a new settlement in the east of East Lothian is referenced at Paragraph 3.13 of the emerging SESPlan 2 as well as paragraphs 2.11 and 2.154 in the Proposed LDP. SESPlan2 also identifies future housing land requirement to deliver an additional 10,000 new homes to 2038 and this assumes the delivery of all new homes in line with the strategy identified in this LDP.

Whilst the LDP has identified sufficient land for development in this LDP cycle, there are sites constrained by physical, environmental and market factors that could undermine the delivery of this strategy and leave East Lothian exposed to a number of less-desirable sites being granted planning permission through the appeal process.

If an alternative strategy (a 'Plan B') has already been agreed should the allocated sites fail to deliver the requisite number of new homes, then East Lothian Council can be seen to addressing these concerns appropriately and proactively. This Proposed LDP makes reference to safeguarded land (paragraphs 2.11 & 3.37) but this only applies to Blindwells. Given its location in the west of the County and the uncertainty over its delivery, East Lothian should seek an additional and/or alternative safeguard to ensure it can react to medium and long term housing land shortfalls.

The expansion of Drem can be achieved in a controlled and phased delivery of up to 2,000 new homes delivering the full range of house types and tenures at a location that can be developed with relatively little landscape impact. Drem would provide an alternative location for those currently priced out of the east of East Lothian market due to high demand and relatively low supply, whilst the potential to create a new location for new or relocated businesses would help reduce the need to commute and ensure that East Lothian residents are encouraged and able to live and work in the County.

As stated above, Drem is located within the East Lothian SDA as set by SESplan. It is also located on a Strategic Growth Corridor as identified in SESplan2 Proposed Plan. The suitability of this location for strategic growth is clearly supported in the SDP.

We have provided further supporting information and wish to see the land to the north of Drem Station identified for potential future development as outlined above.

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

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

No modifications 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):

CALA continues to support the redevelopment of site NK6 for residential use. It is an excellent brownfield development opportunity with a capability of delivering a range of house sizes and styles and will contribute to the mix of sites and new homes that can be delivered to Gullane as part of the sites allocated in the emerging LDP.

Education, transportation and key infrastructure capacity exists for the development of the College site and this should ensure its early delivery, and in advance of other sites in the village.

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:

Please amend the description to 'circa 150 units'.

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):

CALA continues to support the development of site NK7 for residential use. In meeting the challenging targets for new homes delivery in East Lothian, the Council must allocate a number of greenfield sites and Saltcoats represents one such opportunity.

There has been very limited development in Gullane in recent years and the site at Saltcoats enables the Council and CALA to deliver an attractive well-planned south-eastern edge to Gullane. The allocation will deliver a significant number of affordable units excellently located for non-car borne access to the local primary school as well as local amenities and transport links.

Saltcoats will deliver a range of house sizes and styles and will contribute to the mix of sites and new homes that can be delivered to Gullane as part of the sites allocated in the emerging LDP.

CALA has now lodged an application for Planning Permission in Principle for site NK7 seeking permission for up to 150 units.

We have undertaken all necessary studies and the development can be accommodated without significant detrimental impact on roads (both capacity and safety), primary and secondary education capacities and facilities, community and health services or other infrastructure and amenity considerations.

Saltcoats, combined with other proposed development in Gullane represents a significant opportunity to ensure the village is a vital, vibrant and viable community in the coming years.

150 units represents a more efficient use of the site, whilst indicative layouts and design principles have been broadly welcomed by East Lothian Council. Planning permission in principle is being sought reflecting that other sites in Gullane will come forward for development before Saltcoats, which will follow the Fire Training College and Fenton Gait East. This represents an appropriate phasing in the growth of Gullane.

Furthermore we make detailed comments with regards to the development brief for Saltcoats as part of this consultation process (and as part of the response to the Development Briefs consultation document).

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:

No modifications 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):

CALA continues to support the development of site NK8 for residential use with an indicative capacity for 50 units. A detailed application for planning permission has now been lodged showing 49 units including 12 affordable homes.

There has been very limited development in Gullane in recent years and the site at Fenton Gait East Saltcoats enables the Council and CALA to deliver an attractive well-planned eastern edge to Gullane.

Fenton Gait East will deliver a range of house sizes and styles and will contribute to the mix of sites and new homes that can be delivered to Gullane as part of the sites allocated in the emerging LDP.

Furthermore we make detailed comments with regards to the development brief for Fenton Gait East as part of this consultation process (and as part of the response to the Development Briefs consultation document).

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:

Change indicative capacity to circa 35 units.

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):

CALA continues to support the development of site NK11 for residential use with an indicative capacity for approximately 36 new homes. CALA has prepared and submitted an application for full planning permission for 36 new homes including 10 new affordable homes.

36 units represents a more efficient use of the site the capacity having been derived as a consequence of design-led approach. Pre-application discussions have taken place on layouts and design principles, which have been broadly welcomed by East Lothian Council as part of the ongoing application process.

Castlemains will deliver a range of house sizes and styles as part of the development of this field to the south-east of Dirleton and providing a high quality outward facing edge to the settlement whilst looking to protect and enhance key views to Dirleton Castle.

We make detailed comments with regards to the development brief for Castlemains as part of this consultation process (and as part of the response to the Development Briefs consultation document).

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:

Policy NK12: Site Masterplans

As part of any planning application for any allocated site, comprehensive masterplan solutions for the entire allocated site must be submitted.

Proposed masterplans must demonstrate how the relevant objectives for the allocated site will be secured, how development will be delivered on an appropriate phased basis, and set out design requirements to ensure the development will properly integrate with its surroundings and the character of the local area.

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) :

We have removed reference to the Development Briefs and altered the title of NK12. The draft development briefs in their current form are not fit-for-purpose. There has been no engagement with landowners, developers (where known) or Council colleagues where they may have had up to date knowledge of the proposals for the sites. The development briefs do not accurately reflect the physical, technical or economic characteristics of the sites.

Our submissions have addressed these issues in a constructive manner to provide an alternative development brief that reflects the considerable amount of work undertaken as part of the preparation and submission of planning applications for each of the sites.

These applications were submitted following extensive pre-application processes including numerous meetings with East Lothian Council.

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:

3.37 - The SESplan HNDA signposts that there may be need and demand for a further 3,820 dwellings in East Lothian for the period 2024 – 2032. The SDP does not require the LDP to allocate housing land for that period. However, SPP (para. 119) requires that LDPs "allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption". The LDP is expected to be adopted in 2018. Therefore the LDP should allocate land up to 2028. although the Proposed Plan indicates programming of allocations beyond 2028, it does not specifically set out the requirement for the period to 2028. Table HOU2: Housing Land Requirements and Supply on Page 67 should be updated to include the allocations to 2028 to be far clearer, and to be compliant with Para 119 of SPP.

The LDP does identify and safeguard potential opportunities. These include allocated sites that are not expected to be fully developed by 2024. Blindwells is intended to have such a role, which may be enhanced if a suitable comprehensive solution for development of a larger new settlement is found.

A potential new development location at Drem is also safeguarded, both as a potential long-term solution to continued housing land supply pressure but also as a suitable alternative should the preferred strategy fail to deliver the requisite number of new homes.

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):

In line with representations elsewhere, we are proposing that land at Drem is safeguarded for medium-long term development and in response to SESPlan 2 and this plan that recognises the difficulty in accommodating further major growth in the west of the County. Drem would also provide a credible back-up should major developments at inter alia Musselburgh, Wallyford or Blindwells not deliver new homes within the lifetime of this LDP.

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:

PROP T9: Safeguarding of Land for Larger Station Car Parks

Land is safeguarded adjacent to Musselburgh (see also Proposal T11), Longniddry (circa 80 spaces) and Drem (new park and ride facility as part of wider safeguarded land) stations to allow additional car and cycle parking spaces / storage facilities to be provided, as shown on the Proposals Map.

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) :

Our representations throughout this document promote the safeguarding of land for future development at Drem. This is to include greatly improved station facilities at Drem including a dedicated park-and-ride/transport hub to enable and encourage greater public transport use.

In the short term, proposals have been identified that could see the delivery of the park and ride facility at Drem (and therefore far more than the 12 extra spaces identified in Policy T9), underpinned by a limited release of land for enabling residential development to the east of the existing station car park (and within very easy walking distance).

CALA supports the

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):

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:

Policy DP3: Housing Density should be replaced with the following.

Policy DP3: Housing Density

All new housing sites will be expected to respond to the particular circumstances of its location, in particular the accessibility of the site to public transport and other relevant services, and the need to encourage and support the provision of local facilities necessary to high quality urban living. It is the Council's aim to achieve a target average density of 30 dwellings per hectare (net) using a full range of housing types and sizes. However, the Council recognises that design solutions for new housing sites need to account of placemaking principles and the need to meet market demands.

Therefore, density may be increased or reduced where appropriate. In particular, and in response to the specific site characteristics, and in attempting to ensure that a development complements the townscape and landscape setting of the local area, lower densities may be acceptable; this must be justified by developers to the satisfaction of the Council through masterplans and design statements.

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):

Each site must be developed in a appropriate response to the sites' constraints and opportunities and specific characteristics. These physical, locational and market characteristics will best determine the density and mix of the proposed homes.

In the interest of meeting housing delivery targets and in ensuring the efficient development of land, it is entirely appropriate to identify a target density but it must always be more important to ensure an appropriate development for each site as opposed to imposing a blanket density figure. The proposed amendments to the policy therefore allow greater flexibility subject to appropriate justification.

East Lothian must seek to provide a genuine mix of new homes, not necessarily on one site, but across the County and cumulatively across all development sites, acknowledging that certain sites lend themselves better to higher or lower densities.

Developers will know the market better than anyone else and will only build homes that they believe they can sell as quickly as possible. If East Lothian Council wishes to meet its targets for housing delivery to 2019 and beyond to 2024 it must encourage the development of sites, taking full account of placemaking principles and market demands, rather than impose standard density standards unilaterally across the County.

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:

Delete Policy DP9

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) :

The preparation of the development briefs has been completed (admittedly in draft form) without any engagement with landowners, developers (where known) or council colleagues in relevant departments (development management, transportation etc.).

The briefs do not take account of key physical, technical or economic characteristics, opportunities or constraints. In many instances, the briefs require access to or works to take place on third party land, making them impossible to comply with in their present form.

There is planning activity on a significant number of sites that are identified for allocation for residential development and this is critical to ensure the early delivery of new homes.

Pre-application discussions have taken place with Council officials and key consultees and in many circumstances, planning applications have been lodged with East Lothian Council. As the development briefs have been drafted without any reference to the ongoing planning processes, they are, in their current form, not fit-for-purpose and will create a level of conflict in the decision making process as well as (even in draft form) creating a level of expectation within communities who may already have been consulted on specific development proposals and now see a development brief that does not reflect the planning applications already lodged.

It is unreasonable to use previously unseen development briefs to challenge applications that have been submitted with all relevant supporting information and have been consulted on extensively with Council officials. We acknowledge that these conflicts occur to varying degrees at each site but as things stand we believe that policy DP9 should be deleted from the LDP. If it is to be retained, its language should be toned down and the status of the development briefs reduced. As presently worded, Policy DP9 states proposals must conform to the brief. As stated above, in many cases, the requirements of the briefs cannot be delivered. The briefs should only be seen as a guide at most and carry little, if any, weight as a material consideration.

The future preparation and 'adoption' of development briefs should be undertaken by adopting a separate stakeholder consultation process to ensure appropriate and deliverable proposals are promoted through the briefs and sitting alongside established planning policies.

To respond proactively to this situation, we have provided alternative development briefs for the sites CALA is involved in, building on the key aspects of the drafts but reflecting the significant amount of work undertaken in the preparation and submission of applications for planning permission on these sites.

Section 8 - Delivery (pages 142 - 144)

1a Delivery - What modifications do you wish to see made to the Delivery 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 Delivery 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):

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-04 12:50:19**

About You

1 What is your name?

First name:

Ruth

Surname:

Cameron

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

Historic Environment Scotland
Longmore House
Salisbury Place
Edinburgh

4 Please enter your postcode

Postcode:

EH9 1SH

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

Key Agency (Reg 28, Governmental only)

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

Organisation:

Historic Environment Scotland

Your role:

Senior Casework Officer

7 Are you supporting the plan?

Not Answered

If Yes: Please include your reasons for support:

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:

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):

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:

Removal of allocation Prop MH13 from the Plan.

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):

This site is allocated for circa 170 homes with additional potential for employment uses. It was included as an 'other' option in the MIR. It is located within Pinkie battlefield. The proposed plan document states that there would be a requirement to demonstrate that the land can be developed in line with Policy CH5. It is difficult to see how this would be possible, given the sensitivity of the site and the level of development proposed and that the principles in Policy CH5 are consistent with those set out in SPP. In light of this we consider that the impacts of such development would not be in line with SPP policy 149 which states that planning authorities should seek to protect, conserve and, where appropriate, enhance the key landscape characteristics and special qualities of sites in the Inventory of Historic Battlefields. It is on this basis that Historic Environment Scotland is seeking the removal of this allocation from the Local Development Plan.

The Inventory of Historic Battlefields states that the battle of Pinkie was fought in the open fields spread between Inveresk, Musselburgh, Wallyford and the A1. This therefore identifies the allocation as part of the land where the main engagement took place. In an area of engagement such as this, there is the potential for archaeological remains of the battlefield to exist, and these could be significantly adversely impacted by development.

This area also makes a significant contribution to modern understanding of the battlefield landscape. This area is open and flat, set against the higher ground to the south. Much of action of the battle of Pinkie was focussed on attempts to take control of this higher ground. This currently undeveloped open area is an unusual survival for a battlefield in a peri-urban area such as this. It is possible to read in the modern landscape the main areas of manoeuvring and combat, and to understand how these were influenced by the topography of the battlefield.

Given the sensitivity of this area, we do not consider it appropriate for urban development. Building over the currently open fields would significantly impact on the existing battlefield landscape characteristics such that it would be contrary to SPP policy 149. As noted, the proposed local development plan policy for the

protection of battlefields is consistent with the principles set out at national level in SPP. On this basis, we consider that there is no clear reasoning within the plan to demonstrate that the inclusion of this site outweighs national policy for the historic environment.

It is also possible that, depending on the level of as yet unknown archaeological remains in the area, it would have a similarly significant impact on the special qualities of the battlefield. The landscape characteristics and special qualities of inventory battlefields are given equal protection in local and national policy.

The development brief in its current form makes no reference to the battlefield, and therefore does not reflect our previous advice, or the assessment as provided in the ER. We note, in particular, that it identifies an area for employment development in the south west of the allocation. Buildings of an industrial scale in this part of the allocation are likely to separate this land from the rest of the battlefield, and this would be of particular concern. The development brief therefore currently reflects no consideration of this nationally designated heritage asset.

The ER (reference PM/MH/HSG067) identifies potential impacts on the battlefield both on understanding of the battlefield landscape, and on potential archaeological remains. This impact has been scored as negative. We consider it has the potential to be very negative. The text also states that the site submission proposed a 'battlefield monument'. Whilst no comment is made on this in the ER, we would like to clarify that we consider this to be purely compensatory, and not effective mitigation of these potential impacts.

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:

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):

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

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-04 13:59:29**

About You

1 What is your name?

First name:

Lesley

Surname:

McGrath

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

5 South Charlotte Street
Edinburgh

4 Please enter your postcode

Postcode:

EH2 4AN

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

Developer/ agent/ landowner

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

Organisation:

Hallhill Developments Ltd (agent: HolderPlanning)

Your role:

Agent

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

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

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

Modifications(s) Sought:

Please refer to site specific comments related to DR1 to DR5 and DR7.

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

Justification for Modification(s):

This representation has been prepared on behalf of Hallhill Developments Ltd (HDL) in respect to their land interests in Dunbar. HDL have been responsible for providing the land and facilitating the development of the southerly expansion of Dunbar to provide hundreds of homes and the community infrastructure that supports them. HDL have worked closely with East Lothian Council for many years and have funded the development of homes, schools, shops, the Healthy Living Centre, restaurants, a garden centre and much of the infrastructure that supports the community. The outcome has been hugely successful, helping to regenerate the town and providing an attractive and accessible location for thousands of people to live.

With a few reservations, HDL welcome and support the next phase of Dunbar's further planned expansion, and it should be noted that they control the land covered by the proposals DR1 to DR5 and DR7 in the LDP. These are considered further below.

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

1a PROP DR1: Hallhill South West, Dunbar - What modifications do you wish to see made to Prop DR1 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

None

1b Please give any information/reasons in support of each modification suggested to Prop DR1 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

PROP DR1 (Hallhill South West, Dunbar)

HDL secured has already secured planning permission for circa 500 homes on this site, and its development has begun.

2a PROP DR2: Hallhill North, Dunbar - What modifications do you wish to see made to Prop DR2 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

Remove references in the LDP and the Draft Development Brief to the re-opening of the underpass.

2b Please give any information/reasons in support of each modification suggested to Prop DR2 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

PROP DR2 (Hallhill North, Dunbar)

This site is allocated for approximately 250 homes, the expansion of Dunbar Primary School as well as other community uses and infrastructure. However, we have significant concerns regarding the terms of the preamble to PROP DR2 in paragraph 2.138, which states:

“Pedestrian and cycle routes must also be provided to connect the site to other parts of the wider Hallhill development area, and to parts of the town to the north of the rail line, including re-opening of an underpass to the west of the town towards which contributions from the developer of this site will be required”.

Our understanding is that this underpass was infilled with concrete by Network Rail a few years ago because it was structurally unsound. We are also led to understand that the possibility of its reopening was considered subsequently but found to be impractical. We are therefore unclear as to why it is included as a proposal in the LDP, as it is not appropriate for an LDP to require actions that are not supported by evidence to be capable of implementation at reasonable and proportionate cost. We also question the need for the underpass to be re-opened in this location. There is already an underpass leading to the Healthy Living Centre. Also, HDL has recently facilitated the implementation of improvements the Eweford underpass at Dunbar. A 3-phase traffic light system has been introduced, which provides for two-way traffic flows plus a dedicated pedestrian phase. Lighting has also been provided.

3a PROP DR3: Hallhill Healthy Living Centre Expansion Land - What modifications do you wish to see made to Prop DR3 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

In the absence of clear justification for the expansion of Hallhill Healthy Living Centre, as described above, remove all references to it from LDP policies and proposals and supplementary guidance.

3b Please give any information/reasons in support of each modification suggested to Prop DR3 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

PROP DR3 (Hallhill Healthy Living Centre Expansion Land & PROP CF1 (Provision of New Sports Pitches and Changing Accommodation)

This proposals are both identified with reference to Proposal DR2 above, and require one full size grass pitch and two team changing rooms to be provided. Our understanding is that this provision is intended to serve an expanded Dunbar Grammar School, and we are therefore unclear as to why this location at the Healthy Living Centre has been proposed. It would seem more sensible, assuming that a new pitch and changing rooms is actually required, that these be located close to the Grammar School. Therefore, in the absence of any evidence that PROP DR3 is required in this location directly as a result of development at PROP2 DR2.

4a PROP DR4: Brodie Road, Dunbar - What modifications do you wish to see made to Prop DR4 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

None

4b Please give any information/reasons in support of each modification suggested to Prop DR4 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

PROP DR4 Brodie Road, Dunbar

This land is newly allocated for approximately 50 homes, and this proposal is supported by HDL.

5a PROP DR5: Land at Newtonlees, Dunbar - What modifications do you wish to see made to Prop DR5 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

None

5b Please give any information/reasons in support of each modification suggested to Prop DR5 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

PROP DR5 Land at Newtonlees, Dunbar

The land is allocated for approximately 250 homes, and has been granted planning permission in October 2016.

6a PROP DR6: Beveridge Row Belhaven, Dunbar - What modifications do you wish to see made to Prop DR6 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

6b Please give any information/reasons in support of each modification suggested to Prop DR6 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

7a PROP DR7: Land at Spott Road, Dunbar - What modifications do you wish to see made to Prop DR7 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

None

7b Please give any information/reasons in support of each modification suggested to Prop DR7 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

PROP DR7 Land at Spott Road, Dunbar

This land is allocated for employment uses. This proposal is supported by HDL, who will continue in their efforts to identify future end-users for the site.

8a PROP DR8: Pencraighill, East Linton - What modifications do you wish to see made to Prop DR8 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

8b Please give any information/reasons in support of each modification suggested to Prop DR8 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

9a PROP DR9: Land at East Linton Auction Mart - What modifications do you wish to see made to Prop DR9 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

9b Please give any information/reasons in support of each modification suggested to Prop DR9 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

10a PROP DR10: Innerwick East, Innerwick - What modifications do you wish to see made to Prop DR10 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

10b Please give any information/reasons in support of each modification suggested to Prop DR10 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

11a PROP DR11: St John's Road, Spott - What modifications do you wish to see made to Prop DR11 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

11b Please give any information/reasons in support of each modification suggested to Prop DR11 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

12a Policy DR12: Development Briefs - What modifications do you wish to see made to Policy DR12 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

12b Please give any information/reasons in support of each modification suggested to Prop DR12 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

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

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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) :

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:

Proposed Modification: Before Policy DEL1 and related policies and proposals and supplementary guidance are finalised, justification is required on the basis for developer contributions to education as set out in this representation.

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):

PROP ED6 Dunbar Education Proposals

This proposal states:

Part A

The Council will provide additional phased permanent extension to Dunbar Grammar to meet the need arising from proposed new housing development in the Dunbar 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 phased permanent extension to pre-school and primary schools as required to meet the need arising as a direct result of new housing

development in their catchment areas. 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.

Policy DEL1 is also supported by Draft Developer Contributions Framework, intended as Supplementary Guidance. On page 46, it sets out costs for the Dunbar Area Education Contribution Zone as follows:

Secondary School Capacity

Dunbar Grammar School £4,282.00 per house

Pre-school & Primary School Capacity*

Dunbar PS – John Muir P1 – P3 £2,542.00 per house

Dunbar PS – Lochend P4 – P7 £4,973.00 per house

The Draft Developer Contributions Framework is justified by the content of LDP Technical Note 14, which contains the following information for Dunbar on page 36:

Dunbar Grammar: LDP accommodation requirement for increase in capacity from Established (1199) to LDP (1300) new build and alterations to provide 6 classrooms, 1 science, 1 art and ancillary accommodation.

Dunbar Lochend (P4 – P7): 3 classrooms, 1 GP, breakout, stairs, toilets and cloaks, PE hall expansion.

Dunbar John Muir (P1 – P3): 2 classrooms and 1 GP space (1 new classroom and GP space: 1 additional classroom by internal alterations)

We can broadly understand the need for additional classrooms at these schools but unfortunately there is no detailed explanation given for the other construction items. Without a further explanation of the justification for the required contributions, HDL cannot support Policy DEL or the related Developer Contributions Supplementary Guidance relating to education in Dunbar:

Also, we note that the cost per square metre of construction is identified as £3,000. This exceeds the SFT metric and we do not consider this to be justified.

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):

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:

(PROP T3) Proposed Modification: Delete references to the need for developer contribution to the SATC from all LDP policies and proposals and supplementary guidance.

(PROP 9 and PROP10) Proposed Modification: Delete references to the need for developer contribution to rail linked infrastructure from all LDP policies and proposals and supplementary guidance.

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) :

PROP T3: Segregated Active Travel Corridor

The SATC, otherwise known as a 'cycle superhighway' is proposed to extend from Dunbar to Edinburgh, mainly utilising existing roads. As indicated on page 51 of LDP Technical Note 14, the estimated total cost of this is estimated to be £23,400,000 (not including land acquisition costs), of which the developers will be expected to contribute £5,330,000, which is nearly 23% of the cost. There does not appear to be any detailed explanation of how the total amount has been calculated or any explanation of the proportion expected to be funded by developers. We therefore have the following comments:

Firstly, we cannot agree that the needs for the SATC arises directly as a result of new development, and requiring developer contributions would therefore be contrary to the test in Circular 2/2012. Rather, the proposal seems to be a Council aspiration to serve the East Lothian community. We seriously question whether the actual form of provision will provide value for money and is therefore reasonable. And even if it was reasonable to require developer contributions, we doubt that the financial contribution expected from developers is proportionate, at nearly ¼ of the total cost.

PROP T9: Safeguarding Land for Larger Station Car Parks

PROP T10: Safeguarding Land for Platform Lengthening

This proposals are slightly misleading in their titles, as in the text it is explained that developers will be required to contribute to these interventions. In our view, these facilities should be provided directly by Network Rail and not by developers. Network Rail are a private entity who build and maintain the network, and they charge train operators to use the rail network. They seek to make a profit, which they reinvest in the network. Train operators obviously charge passengers with a

view to making a profit. An increased number of passengers arising from new developments will logically increase revenues for both operators and Network Rail. It is therefore completely unacceptable and unreasonable to expect developers to fund improvements to the rail network.

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):

Section 8 - Delivery (pages 142 - 144)

1a Delivery - What modifications do you wish to see made to the Delivery 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:

Proposed Modification: Before Policy DEL1 and related policies and proposals and supplementary guidance are finalised, justification is required on the basis for developer contributions to education as set out in this representation. (PROP ED6).

Proposed Modification: Delete references to the need for developer contribution to the SATC from all LDP policies and proposals and supplementary guidance. (PROP T3).

Proposed Modification: Delete references to the need for developer contribution to rail linked infrastructure from all LDP policies and proposals and supplementary guidance. (PROP T9 and T10).

1b Please give any information/reasons in support of each modification suggested to the Delivery 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):

2. Representations related to DEL1 – Infrastructure and Facilities Provision

Hallhill Developments Limited (HDL) accept the need for new development to be brought forward in association with supporting infrastructure and facilities. The first part of Policy DEL1 states:

“New development will only be permitted where the developer makes appropriate provision for infrastructure and community facilities required as a consequence of their development in accordance with Scottish Government Circular 3/2012 or any revision. Any necessary provision for interventions must be phased as required with the new development”.

As explained in paragraph 2 of Circular 3/2012:

“This Circular sets out the circumstances in which planning obligations and good neighbour agreements can be used and how they can be concluded efficiently. Planning authorities should promote obligations in strict compliance with the tests set out in this circular. In developing planning obligations, consideration should be given to the economic viability of proposals and alternative solutions should be considered alongside options of phasing or staging payments. Concluding planning obligations, or good neighbour agreements, should not delay the benefits of appropriately planned development that is generally in accordance with policy nor add significant costs for developers and infrastructure providers”.

Paragraphs 13 and 14 go on to say:

13. It is not possible to indicate all circumstances in which planning obligations are appropriate. Planning authorities should take decisions based on the relevant development plan, the proposed development, and the tests set out in this circular. Where a planning obligation is considered essential, it must have a relevant planning purpose and must always be related and proportionate in scale and kind to the development in question. These principles are central to the guidance that follows.

POLICY TESTS

14. Planning obligations made under section 75 of the Town and Country Planning (Scotland) Act 1997 (as amended) should only be sought where they meet all of the following tests:

- necessary to make the proposed development acceptable in planning terms (paragraph 15)
- serve a planning purpose (paragraph 16) and, where it is possible to identify infrastructure provision requirements in advance, should relate to development plans
- relate to the proposed development either as a direct consequence of the development or arising from the cumulative impact of development in the area (paragraphs 17-19)
- fairly and reasonably relate in scale and kind to the proposed development (paragraphs 20-23)
- be reasonable in all other respects (paragraphs 24-25)

Although LDP Policy states that the provision of infrastructure and community facilities should be in accordance with Circular 2/2012, we question whether the various policies related to Policy DEL1 meet the above tests. The related policies and proposals are identified in Table DEL1 of the LDP, as follows:

Planning for Housing

Policy HOU3: Affordable Housing Quota

Policy HOU4: Affordable Housing Tenure Mix

PROP ED6: Dunbar Cluster

PROP CF1: Provision of New Sports Pitches and Changing Accommodation

PROP HSC2: Health Care Facilities Proposals Transportation

PROP T3: Segregated Active Travel Corridor

PROP T9: Safeguarding Land for Larger Station Car Parks

PROP T10: Safeguarding Land for Platform Lengthening

PROP T15: Old Craighall A1(T) Junction Improvements

PROP T17: A1(T) Interchange Improvements

PROP T21: Musselburgh Urban Traffic Control System

PROP T27: Tranent Town Centre One-Way System

PROP T28: Junction Improvements Elphinstone Road and Edinburgh Road

Policy T32: Transport Infrastructure Delivery Fund Diverse Countryside & Coast

Policy DC10: The Green Network Our Natural & Cultural Heritage

Policy NH12: Air Quality Delivery

Policy DEL1: Infrastructure and Facilities Provision

The following comments relate to the above provisions which are relevant to HDL's interests.

PROP ED6 Dunbar Education Proposals

This proposal states:

Part A

The Council will provide additional phased permanent extension to Dunbar Grammar to meet the need arising from proposed new housing development in the Dunbar 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 phased permanent extension to pre-school and primary schools as required to meet the need arising as a direct result of new housing

development in their catchment areas. 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.

Policy DEL1 is also supported by Draft Developer Contributions Framework, intended as Supplementary Guidance. On page 46, it sets out costs for the Dunbar Area Education Contribution Zone as follows:

Secondary School Capacity

Dunbar Grammar School £4,282.00 per house

Pre-school & Primary School Capacity*

Dunbar PS – John Muir P1 – P3 £2,542.00 per house

Dunbar PS – Lochend P4 – P7 £4,973.00 per house

The Draft Developer Contributions Framework is justified by the content of LDP Technical Note 14, which contains the following information for Dunbar on page 36:

Dunbar Grammar: LDP accommodation requirement for increase in capacity from Established (1199) to LDP (1300) new build and alterations to provide 6 classrooms, 1 science, 1 art and ancillary accommodation.

Dunbar Lochend (P4 – P7): 3 classrooms, 1 GP, breakout, stairs, toilets and cloaks, PE hall expansion.

Dunbar John Muir (P1 – P3): 2 classrooms and 1 GP space (1 new classroom and GP space: 1 additional classroom by internal alterations)

We can broadly understand the need for additional classrooms at these schools but unfortunately there is no detailed explanation given for the other construction items. Without a further explanation of the justification for the required contributions, HDL cannot support Policy DEL or the related Developer Contributions Supplementary Guidance relating to education in Dunbar:

Also, we note that the cost per square metre of construction is identified as £3,000. This exceeds the SFT metric and we do not consider this to be justified.

Proposed Modification: Before Policy DEL1 and related policies and proposals and supplementary guidance are finalised, justification is required on the basis for developer contributions to education as set out in this representation.

PROP T3: Segregated Active Travel Corridor

The SATC, otherwise known as a 'cycle superhighway' is proposed to extend from Dunbar to Edinburgh, mainly utilising existing roads. As indicated on page 51 of LDP Technical Note 14, the estimated total cost of this is estimated to be £23,400,000 (not including land acquisition costs), of which the developers will be expected to contribute £5,330,000, which is nearly 23% of the cost. There does not appear to be any detailed explanation of how the total amount has been calculated or any explanation of the proportion expected to be funded by developers. We therefore have the following comments:

Firstly, we cannot agree that the needs for the SATC arises directly as a result of new development, and requiring developer contributions would therefore be contrary to the test in Circular 2/2012. Rather, the proposal seems to be a Council aspiration to serve the East Lothian community. We seriously question whether the actual form of provision will provide value for money and is therefore reasonable. And even if it was reasonable to require developer contributions, we doubt that the financial contribution expected from developers is proportionate, at nearly ¼ of the total cost.

Proposed Modification: Delete references to the need for developer contribution to the SATC from all LDP policies and proposals and supplementary guidance.

PROP T9: Safeguarding Land for Larger Station Car Parks

PROP T10: Safeguarding Land for Platform Lengthening

These proposals are slightly misleading in their titles, as in the text it is explained that developers will be required to contribute to these interventions. In our view, these facilities should be provided directly by Network Rail and not by developers. Network Rail are a private entity who build and maintain the network, and they charge train operators to use the rail network. They seek to make a profit, which they reinvest in the network. Train operators obviously charge passengers with a view to making a profit. An increased number of passengers arising from new developments will logically increase revenues for both operators and Network Rail. It is therefore completely unacceptable and unreasonable to expect developers to fund improvements to the rail network.

Proposed Modification: Delete references to the need for developer contribution to rail linked infrastructure from all LDP policies and proposals and supplementary guidance.

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-04 14:39:23**

About You

1 What is your name?

First name:

Philip

Surname:

Graham

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

Wemyss House
8 Wemyss Place
Edinburgh

4 Please enter your postcode

Postcode:

EH3 6DH

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

Developer/ agent/ landowner

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

Organisation:

Savills

Your role:

Senior Planner

7 Are you supporting the plan?

Yes

If Yes: Please include your reasons for support:

Our representation is written in support of the proposed employment allocation HN8 'Land at Peppercraig East, Haddington'. However, we do suggest modifications which, dependent on Council opinion, may constitute significant objections that require to be resolved by a Reporter at Examination of the Proposed LDP.

We support the proposed allocation HN8 for the following reasons.

The allocated site is directly in line with the requirements of national, strategic and local planning policy.

In particular, allocation of the site fits with Scottish Planning Policy (paragraph 93) which details that the planning system should:

- promote business and industrial development that increases economic activity while safeguarding and enhancing the natural and built environments as national assets;
- allocate sites that meet the diverse needs of the different sectors and sizes of business which are important to the plan area in a way which is flexible enough to accommodate changing circumstances and allow the realisation of new opportunities; and
- give due weight to net economic benefit of proposed development.

SESplan, the relevant Strategic Development Plan, details that Haddington is in an "Long Term Growth Corridor" and that the town is identified for strategic growth between 2018 and 2030. In addition, p35 "Employment Land Supply", details that it is "essential that there is sufficient employment land which is both available and situated in the right locations to provide jobs to meet the region's growing population". SESplan also directs Local Development Plans to identify and safeguard a significant supply of employment land, this land should "be able to deliver sites which are serviced or serviceable over the plan period".

Allocation of HN8 will therefore contribute to the strategic policy direction for south-east Scotland.

One of the objectives of the Proposed Local Development Plan (PLDP) is to “Help grow the economy, increase housing supply and reduce inequalities”. To achieve this the plan requires to “meet economic and housing land requirements in appropriate marketable locations so...opportunities for economic growth and job creation can be delivered”.

The allocation at HN8 provides 7 hectares of potential employment land. It is considered that this land is available for development and so it can contribute to the growth of the East Lothian economy and to the Council's supply of economic land.

We also believe that the land is located in the right location. The allocation is located within the Haddington Cluster, and is therefore within one of the main settlements in East Lothian. In addition, it is in a highly accessible location, adjacent to the A1, which is one of the main vehicular routes to and from England, and to Edinburgh and the rest of Scotland.

Our clients are in discussions with a developer for the eastern portion of the land. It is considered that this part of the site will be brought forward for development imminently. In turn, it is expected that service provision at this early stage can assist in allowing further land parcels to come forward within the plan period.

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:

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):

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:

We propose to reword the paragraph at PLDP paragraph 2.125, blue box "Prop HN8: Land at Peppercraig East, Haddington".

We propose the following paragraph is included within the blue box, to replace the existing wording:

"Required mitigation measures, including all required developer obligations, will be established as part of the consideration of each individual planning application in line with the requirements outlined in the Developer Obligations Supplementary Guidance and the relevant Development Framework "

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):

We consider that our suggested modification above is minor but we think it is important to make it clear that there is a specific framework to deal with developer obligations and site specific requirements contained within the Developer Obligations Supplementary Guidance and appropriate Development Framework respectively.

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):

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-04 15:36:49**

About You

1 What is your name?

First name:

Susan

Surname:

Laidlaw

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

Unit 1
Wester Inch Business Park
Old Well Court
Bathgate
West Lothian

4 Please enter your postcode

Postcode:

EH48 2TQ

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

Developer/ agent/ landowner

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

Organisation:

Persimmon Homes East Scotland

Your role:

Strategic Land Manager

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

In the main, Persimmon Homes welcomes and supports the content of the Plan and its associated documentation.

This response relates to matters specific to Proposal TT4: Lammermoor Terrace, Tranent.

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 2d - Tranent Cluster Main Development Proposals

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

PROP TT4: Lammermoor Terrace, Tranent and paragraph 2.94 on page 30 should be amended to state that the site can accommodate circa 180 units rather than the 120 units currently specified in the Proposed Plan.

Should the Reporter be minded to review the unit numbers associated with Proposal TT4: Lammermoor Terrace, we would recommend that the site capacity shown within Table HOU1: Housing Proposals by Cluster Area on page 65 should also be amended to indicate 180 units rather than 120 units.

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

Justification for Modification(s):

Whilst Persimmon Homes wholly support the inclusion of Proposal TT4: Lammermoor Terrace as a housing allocation within the Proposed Plan, it is recommended that the scope of this site be re-assessed to circa 180 units in accord with our previous submissions and representations to the Main Issues Report in 2015. A detailed site layout has been prepared in full accord with the Draft Development Brief prepared by East Lothian Council for the site which demonstrates that the capacity of PROP TT4 has clearly been underestimated.

Persimmon believe the unit numbers allied to the site has been based upon an arbitrary calculation of 30 units/ha over an assumed net site area of 4ha when the actual net developable extent of the site is 4.65 ha.

In this respect, and taking account of a masterplanning exercise has been undertaken for the Lammermoor Terrace site based on the Draft Development Brief prepared by ELC as Supplementary Planning Guidance it has been confirmed that the site can easily accommodate 180 units after necessary open space and landscaping requirements are met. This equates to a density of nearer 38 units/ha and is generally the coverage Persimmon are achieving on the majority of their current sites within Scotland. The housing mix utilised to achieve this coverage would provide for a range and choice of residential units across the site and fully incorporates the requirement for 25% affordable housing. This approach appears to be supported by Policy DP3: Housing Density on Page 139 which states that "all new housing sites will be expected to achieve a minimum average density of 30 dwellings per hectare (net) using a full range of house types and sizes" .

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

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

Justification for Modification(s):

Response to 17a - Modifications (no space to add comments under Section 17a)

It remains unclear as to whether the Draft Development Briefs Supplementary Planning Guidance published for consultation alongside the Proposed Plan will be adopted alongside the Plan. In this respect, we suggest that the wording of Policy TT17 on paragraph 2.109 be amended to remove the absolute obligation for the requirement to 'conform' with the Brief.

It should be further noted that we would wish to raise the same objection regarding Policy DP9: Development Briefs on page 141.

Justification:

Development Briefs prepared for individual sites have been produced without any input from the developers who will be delivering the housing sites. As such, we believe that Policy TT17 is overly restrictive by stating that sites 'must conform' with the relevant Development Brief.

In this respect, it is suggested that insufficient analysis of individual sites has been undertaken at this stage in the process and that it would be remiss to leave absolutely no flexibility in the design of individual sites. It is anticipated that taking such an inflexible approach could potentially impact on the deliverability of individual sites contained within the Plan.

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 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:

It remains unclear as to whether the Draft Development Briefs Supplementary Planning Guidance published for consultation alongside the Proposed Plan will be adopted alongside the Plan. In this respect, we suggest that the wording of DP9 on Page 141 be amended to remove the absolute obligation for the requirement to 'conform' with the Brief.

It should be further noted that we would wish to raise the same objection regarding Policy TT17: Development Briefs and Paragraph 2.109 (Page 37)

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) :

Development Briefs prepared for individual sites have been produced without any input from the developers who will be delivering the housing sites. As such, we believe that Policy DP9 is overly restrictive by stating that sites 'must conform' with the relevant Development Brief.

In this respect, it is suggested that insufficient analysis of individual sites has been undertaken at this stage in the process and that it would be remiss to leave absolutely no flexibility in the design of individual sites . It is anticipated that taking such a inflexible approach could potentially impact on the deliverability of individual sites contained within the Plan.

Section 8 - Delivery (pages 142 - 144)

1a Delivery - What modifications do you wish to see made to the Delivery 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 Delivery 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):

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-04 17:58:58**

About You

1 What is your name?

First name:

David

Surname:

Howel

2 What is your email address?

Email address:

[REDACTED]

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 BS&S Group

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

Object to 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:

Deletion of Countryside Around Towns designation 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):

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 A1 (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.

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-04 18:56:56**

About You

1 What is your name?

First name:

HARRY

Surname:

BARKER

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

[REDACTED]

[REDACTED]

4 Please enter your postcode

Postcode:

[REDACTED]

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

Local Interest Group

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

Organisation:

RELBUS (Rural East Lothian Bus Group)

Your role:

Chairman

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

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:

Our objection relates to paragraphs 4.15 and 4.16 of the Proposed Local Development Plan document and to Policy T8 (pages 91 and 92). Our contention is that this policy should be rewritten as follows:

"The council will continue to liaise closely with bus operators to ensure the bus network has adequate coverage and is fit for purpose, including where new development is proposed. Where the need arises as a direct consequence of development, road networks and housing layouts should be designed so as to allow safe and satisfactory bus access and the maximisation of dwellings within 400m of a bus stop. Developers will also be required to make provision for other infrastructure associated with bus network improvements and/or to make contributions towards an agreed level of service on a case by case basis to ensure that their development benefits from sustainable transport options. This will include and may not be limited to the following bus infrastructure within or in proximity to their sites:

- Bus stops and shelters;

- Waiting facilities;

-Real Time Information at certain locations;

-Bus layover facilities (if appropriate)

-'Kassel' kerbing;

-Electric charging points (if appropriate).'

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

Justification for Modification(s) :

The substantial increase in housing in several East Lothian towns and villages means that public transport, and in particular bus provision, will have to be reviewed. In particular where new housing estates are built which are situated a meaningful distance from the town's shopping centre(s) will require to have some form of public transport provided if the objective of having a bus stop within 400 yards of housing is to be met.

Para 4.15 and 4.16

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:

None

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):

None as above

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:

None

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):

None as above

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:

None

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):

None as above

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:

None

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):

None as above

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:

None

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):

None as above

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on 2016-11-04 20:45:35

About You

1 What is your name?

First name:

Kate

Surname:

Smith

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

[REDACTED]

[REDACTED]

[REDACTED]

4 Please enter your postcode

Postcode:

[REDACTED]

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

Local Interest Group

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

Organisation:

Save East Linton from Excessive Expansion

Your role:

Co-manager

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

Section 1 - Introduction (pages 1-10)

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

Modification(s) sought::

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

Justification for Modification(s):

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

1a PROP DR1: Hallhill South West, Dunbar - What modifications do you wish to see made to Prop DR1 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

1b Please give any information/reasons in support of each modification suggested to Prop DR1 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

2a PROP DR2: Hallhill North, Dunbar - What modifications do you wish to see made to Prop DR2 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

2b Please give any information/reasons in support of each modification suggested to Prop DR2 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

3a PROP DR3: Hallhill Healthy Living Centre Expansion Land - What modifications do you wish to see made to Prop DR3 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

3b Please give any information/reasons in support of each modification suggested to Prop DR3 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

4a PROP DR4: Brodie Road, Dunbar - What modifications do you wish to see made to Prop DR4 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

4b Please give any information/reasons in support of each modification suggested to Prop DR4 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

5a PROP DR5: Land at Newtonlees, Dunbar - What modifications do you wish to see made to Prop DR5 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

5b Please give any information/reasons in support of each modification suggested to Prop DR5 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

6a PROP DR6: Beveridge Row Belhaven, Dunbar - What modifications do you wish to see made to Prop DR6 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

6b Please give any information/reasons in support of each modification suggested to Prop DR6 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

7a PROP DR7: Land at Spott Road, Dunbar - What modifications do you wish to see made to Prop DR7 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

7b Please give any information/reasons in support of each modification suggested to Prop DR7 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

8a PROP DR8: Pencraighill, East Linton - What modifications do you wish to see made to Prop DR8 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

2.144 Land at Penraig Hill is allocated for circa for 100 homes and we object to this.

8b Please give any information/reasons in support of each modification suggested to Prop DR8 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

1.61 To ensure that new development, and the locations where and way in which it is delivered, contributes to climate change and regeneration objectives, including the need to reduce travel, greenhouse gas emissions as well as energy consumption and waste, and to provide for appropriate renewable energy generation opportunities

We do not believe the development meets the objective of reducing the need to travel given there is no train station (East Linton being the only settlement along the A1 corridor that does not have one).

We believe the cumulative effect of all the proposed allocations to housing plus the recent new developments such as the 500 houses at North Berwick, has increased the need to travel which exacerbates greenhouse gas emissions.

1.61 To integrate land use and transport by finding locations for new development that reduce the need to travel and that are well-served by a range of transport modes, particularly public transport and active travel opportunities, and to help reduce CO2 emissions

We do not believe this allocation reduces the need to travel given the lack of transport infrastructure and the lack of viable employment opportunities in East Lothian.

1.61 To provide opportunities for economic growth and job creation and to meet housing requirements in appropriate marketable locations. There are very limited job opportunities in East Linton.

1.61 In so doing, to promote regeneration and the creation of mixed communities which provide opportunities for employment and housing, including affordable homes, and areas for leisure and recreation and other services and amenities locally, focusing on town centres first.

This allocation is outside the village boundaries and is proposing 100 houses which could arguably increase the population of the village by 20-25%. We are concerned about the lack of recreational facilities and health infrastructure, including doctor's surgery and pharmacy facility.

The parking available within the village is insufficient to cope with traffic from new housing.

1.61 To recognise the important role that town centres and other mixed use areas have in providing services locally and to protect them from inappropriate development while identifying where and how appropriate new beneficial development opportunities may be realised .

Unlike many villages in East Lothian, East Linton is a conservation village and a stopping point for the John Muir Way. We are concerned about the measures being taken to ensure that its conservation status is being preserved and protected and to ensure that the development is appropriate to its conservation status.

1.61 To encourage the diversification of the rural economy by supporting appropriate economic development and tourism, while recognising the pressures the area is under for housing development, and to maximise the use of appropriate traditional buildings.

This allocation, given that it is currently agricultural land, will not be maximising the use of appropriate, traditional buildings and recent developments have not enhanced the appearance of the village.

We are concerned additional housing will not support economic development and tourism.

1.61 To 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.

It is our opinion that the proposed allocation will have a visual impact from both the ingress and exit points of the John Muir Way e.g. viewpoints from Drylawhill and also Tynninghame Bay. The recent development of Miller Homes has slate and harling which we believe is out of character, not in the vernacular of the region and, in our opinion, has had a detrimental impact on the visual appearance of East Linton as you approach from both Edinburgh and North Berwick.

Furthermore, within the Main Issues Report, the view point from Markle Laird's House is considered significant and we do not believe this has been taken into consideration.

1.61 To ensure that the area's significant international, national and local cultural and natural heritage assets are protected and conserved, and where appropriate enhanced, including biodiversity, flora and fauna as well as soil, water and air quality.

The housing allocation will have a visual impact on the nearby standing stone as you approach from Penraig Hill. This is particularly important given the nearby Neolithic settlement and Ancient Scheduled Monument at Drylawhill.

1.61 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.

We object to the proposed development given that it falls outwith the current village boundary.

1.61 To 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.

The 2011 Census states that East Lothian has the highest proportion of younger and older people in Scotland and that the number of older people between 2012 – 2037 is expected to increase by 72%. We believe that this should be recognised by planners specifically in relation to stretched health services. Retired people require different facilities and this will impact the current medical services and facilities for older people.

In relation to the education infrastructure, the East Linton Primary School playground is already proportionately small compared to the size of the school. Any additional housing will have a huge and negative impact, given that at least two of the primary school classes are at capacity. This is crucial as East Lothian is one of the fastest growing counties in terms of population and the developers of Andrew Meikle only committed £98,000 towards education facilities.

This housing allocation could substantially increase the number of pupils at school by as much as 20-25%.

Finally, there are few leisure facilities in East Linton.

To minimise energy consumption, safeguard mineral deposits where appropriate and reduce waste arising.

We believe that the proposed allocation will have an impact on the sewerage which we understand is already at capacity.

9a PROP DR9: Land at East Linton Auction Mart - What modifications do you wish to see made to Prop DR9 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

9b Please give any information/reasons in support of each modification suggested to Prop DR9 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

10a PROP DR10: Innerwick East, Innerwick - What modifications do you wish to see made to Prop DR10 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

10b Please give any information/reasons in support of each modification suggested to Prop DR10 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

11a PROP DR11: St John's Road, Spott - What modifications do you wish to see made to Prop DR11 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

11b Please give any information/reasons in support of each modification suggested to Prop DR11 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

12a Policy DR12: Development Briefs - What modifications do you wish to see made to Policy DR12 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

12b Please give any information/reasons in support of each modification suggested to Prop DR12 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-04 21:41:16**

About You

1 What is your name?

First name:

Simon

Surname:

Capaldi

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

[REDACTED]

4 Please enter your postcode

Postcode:

[REDACTED]

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

Local resident/member of the public

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

Organisation:

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::

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

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

Removal from the local development plan. The site is grade 1 agricultural land and out with the village boundary where there is no clear defensible and robust boundary and it is unsustainable as a development site.

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) :

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on 2016-11-04 21:54:40

About You

1 What is your name?

First name:

Simon

Surname:

Capaldi

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

[REDACTED]

4 Please enter your postcode

Postcode:

[REDACTED]

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

Local resident/member of the public

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

Organisation:

Your role:

7 Are you supporting the plan?

No

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:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

Removal of PROP NK7 from the local development plan.

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):

The site is outwith the settlement boundary/envelope.

There are no defendable and robust boundaries to the site.

The site is unsustainable.

The site is prime grade 1 agricultural land.

The council has not provided any jobs that would provide employment for the proposed home owners/occupiers.

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:

Removal from the local development plan.

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):

The site is outwith the settlement boundary/envelope.

There are no defendable and robust boundaries to the site.

The site is unsustainable.

The site is prime grade 1 agricultural land.

The council has not provided any jobs that would provide employment for the proposed home owners/occupiers.

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:

Removal from the local development plan.

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) :

The site is outwith the settlement boundary/envelope.

There are no defendable and robust boundaries to the site.

The site is unsustainable.

The site is prime grade 1 agricultural land.

The council has not provided any jobs that would provide employment for the proposed home owners/occupiers.

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) :

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

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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):

Additional Comments

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:

Complete review of the local development plan.

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

Justification for Modification(s):

There has been no thought on the impact on the existing infrastructure which needs to be in place prior to any further development.

File upload:

No file was uploaded

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on 2016-11-05 14:32:03

About You

1 What is your name?

First name:

Anna

Surname:

Buckby

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4 Please enter your postcode

Postcode:

[REDACTED]

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

Local resident/member of the public

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

Organisation:

Your role:

7 Are you supporting the plan?

No

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:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

I request that Saltcoat (NK7) be removed from the proposed LDP

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):

The cumulative effective of NK7, NK 8 and NK 9 in addition to NK 6 in Gullane will damage and negatively impact on local amenities, leisure facilities, the village hall, medical facilities, the school and recreation for local residents. Community facilities can not meet the increased level of demand. The village is one of the most attractive locations, expansion would have a negative impact on tourism.

The cumulative impact on Gullane's rural road network has not been thoroughly accessed e.g. C111 towards West Fenton and beyond West Fenton and Luffness. Increased use will make the road unsafe and increase personal risk to pedestrians, cyclists, runners and horse riders. This along with the cumulative result in increased traffic will again negatively impact on the nature of the village as a rural community, a tourist place of attraction, place extra demand on parking and increase environmental noise and pollution in this conservation area. The inclusion of two major greenfield sites compromises the delivery of the brownfield site. The scale would be over development and is proportionally unreasonable in this East Lothian village, the community of Gullane can not meet the increased capacity and the negative impact can not be mitigated.

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:

I request that Fenton Gait East (NK8) is removed from the proposed LDP.

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):

The cumulative effective of NK7, NK 8 and NK 9 in addition to NK 6 in Gullane will damage and negatively impact on local amenities, leisure facilities, the village hall, medical facilities, the school and recreation for local residents. Community facilities can not meet the increased level of demand. The village is one of the most attractive locations, expansion would have a negative impact on tourism.

The cumulative impact on Gullane's rural road network has not been thoroughly accessed e.g. C111 towards West Fenton and beyond West Fenton and Luffness. Increased use will make the road unsafe and increase personal risk to pedestrians, cyclists, runners and horse riders. This along with the cumulative result in increased traffic will again negatively impact on the nature of the village as a rural community, a tourist place of attraction, place extra demand on parking and increase environmental noise and pollution in this conservation area. The inclusion of two major greenfield sites compromises the delivery of the brownfield site. The scale would be over development and is proportionally unreasonable in this East Lothian village, the community of Gullane can not meet the increased capacity and the negative impact can not be mitigated.

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:

I request that Fenton Gait South is removed from the proposed LDP.

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) :

The cumulative effective of NK7, NK 8 and NK 9 in addition to NK 6 in Gullane will damage and negatively impact on local amenities, leisure facilities, the village hall, medical facilities, the school and recreation for local residents. Community facilities can not meet the increased level of demand. The village is one of the most attractive locations, expansion would have a negative impact on tourism.

The cumulative impact on Gullane's rural road network has not been thoroughly accessed e.g. C111 towards West Fenton and beyond West Fenton and Luffness. Increased use will make the road unsafe and increase personal risk to pedestrians, cyclists, runners and horse riders. This along with the cumulative result in increased traffic will again negatively impact on the nature of the village as a rural community, a tourist place of attraction, place extra demand on parking and increase environmental noise and pollution in this conservation area. The inclusion of two major greenfield sites compromises the delivery of the brownfield site. The scale would be over development and is proportionally unreasonable in this East Lothian village, the community of Gullane can not meet the increased capacity and the negative impact can not be mitigated.

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) :

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-05 15:43:07**

About You

1 What is your name?

First name:

E

Surname:

Dickson

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

[REDACTED]

4 Please enter your postcode

Postcode:

[REDACTED]

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

Local resident/member of the public

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

Organisation:

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::

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

Justification for Modification(s):

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

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

Modifications(s) sought:

para 2.3

the "spatial" strategy should a dispersed one.

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):

para .1-2.13

The small "west sector" of the west side of East Lothian (as per the compact map) cannot cope with any further developments.

The small west sector is already struggling to cope with the current increase in population. Public Transport (particularly Trains) are already at capacity, along with local roads (A720/A1 Old Craighall Junction, A1/A198 Bankton junction and Musselburgh).

A compact growth will just exacerbate the problem in this small area of East Lothian, with extra cars and buses using the existing road space. Slower moving traffic will increase pollution and in town centres, Musselburgh in particular pollution will increase and affect people's health and well being.

Countryside and Open Space is valuable to people's quality of life and should not be lost in the small minority west area of East Lothian being proposed for the majority of the developments.

The compact growth strategy will just increase the price of land and house in and around the towns on the east side of East Lothian, making it harder for low waged and first time buyers to get on the property or rental market, House prices and Rental prices will increase as demand will outstrip supply in the east. Making towns like North Berwick only for the elite and rich.

Also it will not increase the demand for Public Transport, in particular buses due to the lack of demand.

A dispersed approach should be adopted.

This will reduce congestion in the small west area of the west of the county (as per spatial) marked for the majority of the developments. Improve people's quality of life by retaining countryside and open spaces in the west.

Housing should be dispersed evenly and fairly across the county. Increasing the supply of houses in the east, which will have 2 benefits:

Make houses in the east more affordable.

Public transport: Demand will increase for buses, extra and more frequent services would be required. With the potential for the introduction of express services.

Example North Berwick direct to Edinburgh, bypassing Musselburgh.

Getting people out of their cars and onto Public Transport, which would reduce traffic on the roads and reduce pollution in towns.

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

1a What modifications do you wish to see made to the Strategy map for the Prestonpans/Cockenzie/Port Seton/Longniddry Cluster?

Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question. Do you have any comments to make on the

Modifications(s) Sought :

Reference EGT1 should be applied to the former Power Station Energy footprint only - not to the surrounding land, which should retain its designation as Public Open Space and Countryside.

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

Justification for Modification(s) :

The area shown on the map accompanying the Local Development Plan (inset Map 32) extends well beyond the site of the former energy footprint of Cockenzie Power Station.

The majority of this land is currently designated, in the East Lothian Local Plan 2008, as Countryside (DC1) or Public Open Space (C3). The land associated with power generation extends to the areas of land covered by the main power station building, transformer building, coal plant and the coal conveyor buildings. This is the site allocated in the adopted 2008 local plan as NRG1.

The proposed changes are not a requirement of National Planning Framework 3 and appear to be seeking to extend the boundaries of the former Power Station site

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

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

Modifications(s) Sought:

2.49 ELC should modify the LDP to accommodate the dispersed spatial strategy - rather than the compact strategy.

2.51 Port-related developments should be removed from potential developments

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

Justification for Modification(s):

2.49 The Preferred Approach of compact spatial strategy - concentrating development in the west of the county risks removing much of the public and amenity land for the existing communities.

2.51 Energy related uses, manufacturing, servicing and potentially port related developments are not compatible with the dense residential strategy being proposed under the Plan or with the existing rural residential nature of the area.

I would ask that ELC uphold their views at paragraphs 2.55 & 2.56 with regard to Strategic Landscape Mitigation where they state '2.55 There are areas of land outwith the green belt that are also under development pressure. These are between Prestonpans, Cockenzie, the allocated land at Blindwells and Tranent. Development in these locations would lead to the coalescence of settlements, undermine their character and setting, compromise cultural heritage assets, including battlefields, and / or lead to the loss of the best prime quality agricultural land. The combination of these environmental constraints points to a need to restrain further built development here which, individually or cumulatively, would undermine related objectives. A Countryside Around Town Designation applies to land between these neighbouring settlements. Around Town Designation, to ensure Prestonpans, Cockenzie, Tranent, Blindwells and Longniddry retain their separate identities. This will provide active travel opportunities to link communities, growth areas and places beyond them together. Opportunities for recreation and habitat creation and connection will be delivered as part of the multifunctional Green Network. 2.56 Strategic Green Network opportunities will be delivered, including within the Countryside.'

Additionally paragraph 2.57 states that 'The site of the Battle of Prestonpans is designated, as identified by the National Inventory.' Please may this remain so - and it is not designated for industrial use.

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

1a PROP PS1: Longniddry South - What modifications do you wish to see made to Prop PS1 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.

Modification(s) Sought:

File upload:

No file was uploaded

1b Please give any information/reasons in support of each modification suggested to Prop PS1 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

2a PROP PS2: Land at Dolphingstone North, Prestonpans - What modifications do you wish to see made to Prop PS2 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 Prop PS2 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

3a Policy PS3: Development Briefs - What modifications do you wish to see made to Policy PS3 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 Policy PS3 of the 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:

No file was uploaded

Visual Upload:

No file was uploaded

Additional Comments

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:

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

Justification for Modification(s):

File upload:

No file was uploaded

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-05 21:49:23**

About You

1 What is your name?

First name:

Carol

Surname:

Agnew

2 What is your email address?

Email address:

parentcouncil@wallyford.elcschool.org.uk

3 Postal Address

Address:

C/O Wallyford Primary School
39 Salters Road
Wallyford

4 Please enter your postcode

Postcode:

EH21 8LB

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

Local Interest Group

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

Organisation:

Wallyford Primary School Parents & Carers Council

Your role:

Chair

7 Are you supporting the plan?

Yes

If Yes: Please include your reasons for support:

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:

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):

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:

None

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):

We support the proposed location of a new secondary school in Wallyford, particularly the choice of a location close to other local services including shops. Our only concern relevant to the development plan relates to traffic management around the school, ensuring there is adequate provision for drop off by car as well as safe access for pedestrians and cyclists.

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:

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):

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 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):

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-06 14:01:51**

About You

1 What is your name?

First name:

Ed

Surname:

Bethune

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

[REDACTED]

4 Please enter your postcode

Postcode:

[REDACTED]

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

Local resident/member of the public

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

Organisation:

Your role:

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

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

1a What modifications do you wish to see made to the Strategy map for the Prestonpans/Cockenzie/Port Seton/Longniddry Cluster?

Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question. Do you have any comments to make on the

Modifications(s) Sought :

Reference EGT1 should be applied to the former Power Station Energy footprint only - not to the surrounding land, which should retain its designation as Public Open Space and Countryside.

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

Justification for Modification(s) :

The area shown on the map accompanying the Local Development Plan (inset Map 32) extends well beyond the site of the former energy footprint of Cockenzie Power Station. The majority of this land is currently designated, in the East Lothian Local Plan 2008, as Countryside (DC1) or Public Open Space (C3). The land associated with power generation extends to the areas of land covered by the main power station building, transformer building, coal plant and the coal conveyor buildings. This is the site allocated in the adopted 2008 local plan as NRG1.

The proposed changes are not a requirement of National Planning Framework 3 and appear to be seeking to extend the boundaries of the former Power Station site.

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

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

Modifications(s) Sought:

2.49 ELC should modify the LDP to accommodate the dispersed spatial strategy - rather than the compact strategy.

2.51 Port-related developments should be removed from potential developments - it is my opinion that port related developments are unsuitable for this site due to the lack of deep water and the inevitable loss of land which has been used as public parkland for decades.

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

Justification for Modification(s):

2.49 The Preferred Approach of compact spatial strategy - concentrating development in the west of the county risks removing much of the public and amenity land for the existing communities.

2.51 Energy related uses, manufacturing, servicing and potentially port related developments are not compatible with the dense residential strategy being proposed under the Plan or with the existing rural residential nature of the area.

I would ask that ELC uphold their views at paragraphs 2.55 & 2.56 with regard to Strategic Landscape Mitigation where they state '2.55 There are areas of land outwith the green belt that are also under development pressure. These are between Prestonpans, Cockenzie, the allocated land at Blindwells and Tranent. Development in these locations would lead to the coalescence of settlements, undermine their character and setting, compromise cultural heritage assets, including battlefields, and / or lead to the loss of the best prime quality agricultural land. The combination of these environmental constraints points to a need to restrain further built development here which, individually or cumulatively, would undermine related objectives. A Countryside Around Town Designation applies to land between these neighbouring settlements. Around Town Designation, to ensure Prestonpans, Cockenzie, Tranent, Blindwells and Longniddry retain their separate identities. This will provide active travel opportunities to link communities, growth areas and places beyond them together. Opportunities for recreation and habitat creation and connection will be delivered as part of the multifunctional Green Network. 2.56 Strategic Green Network opportunities will be delivered, including within the Countryside.'

Additionally paragraph 2.57 states that 'The site of the Battle of Prestonpans is designated, as identified by the National Inventory.' Please may this remain so - and it should not be designated for industrial use. The notion of any other position is completely unacceptable to me and many many other local people and visitors to our historic area.

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-06 18:06:37**

About You

1 What is your name?

First name:

Gary

Surname:

Donaldson

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

[REDACTED]

[REDACTED]

[REDACTED]

4 Please enter your postcode

Postcode:

[REDACTED]

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

Community Council

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

Organisation:

Cockenzie and Port Seton Community Council

Your role:

Chairman

7 Are you supporting the plan?

No

If Yes: Please include your reasons for 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:

Page 11 Section 2.3

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):

We do not believe focussing development, especially housing, in the west of East Lothian is the best strategy.

This would put great strain on shared services especially schools and doctors surgeries.

The volume of traffic on the roads around the west of East Lothian is already creating many problems. Roads are at saturation point and concentrating further road users to this will lead to frustration and an increase in road traffic accidents.

The concentration of traffic will also lead to a decrease in local air quality. With areas such as Musselburgh already experiencing a major air pollution issue this will only worsen the situation.

We believe the best option would be to spread housing accross East Lothian, especially along the A1 corridor.

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-06 18:36:44**

About You

1 What is your name?

First name:

Justin

Surname:

Lamb

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

Justin Lamb Associates
4a Glenfinlas Street
Edinburgh

4 Please enter your postcode

Postcode:

EH3 6AQ

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

Developer/ agent/ landowner

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

Organisation:

Justin Lamb Associates

Your role:

Consultant for Ewan Rutherford

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

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:

Our client Mr Rutherford owns 1.05 acres of land at Old Craighall which is located within the village envelope within the adopted East Lothian Council Local Plan 2008. The land is located adjacent to Old Craighall Road directly between 1 Old Craighall Road and Stanmore (cottage) - see attached plan denoting the location of the site.

The land should be zoned for residential development either independent of PROP MH1 or as housing site as part of the PROP MH1 proposal.

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):

Our clients site is located in Old Craighall village directly between 1 Old Craighall Road and Stanmore (cottage).

The land is within the village envelope in the Adopted Local Plan and therefore in policy terms would be currently supported for housing subject to detailed

design.

We have held initial discussions with planning and highways officials regarding the development of this land and received detailed feedback from planning on the site layout and development considerations that should be taken into account in any application. We have engaged with a developer and a detailed design for the site is being developed for submission as a planning application.

The MH1 designation brings the site into the much larger Persimmon Homes proposal and does not take account of the current designation or work that is ongoing at present.

Furthermore, the proposed Design Brief for the MH1 site zones our clients land as town centre zoning where a Primary School is required. We have had no communication from East Lothian Council or Persimmon Homes in relation to the proposed zoning of Mr Rutherford's land within the MH1 site.

We respectfully request that Mr Rutherford's land which is located within the existing settlement boundary be zoned for housing in line with its current housing and compatible uses status such that it can be brought forward in the short term as currently intended.

We are of course willing to discuss and work with East Lothian Council to ensure that the site layout is complimentary to the MH1 wider objectives.

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:

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):

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.

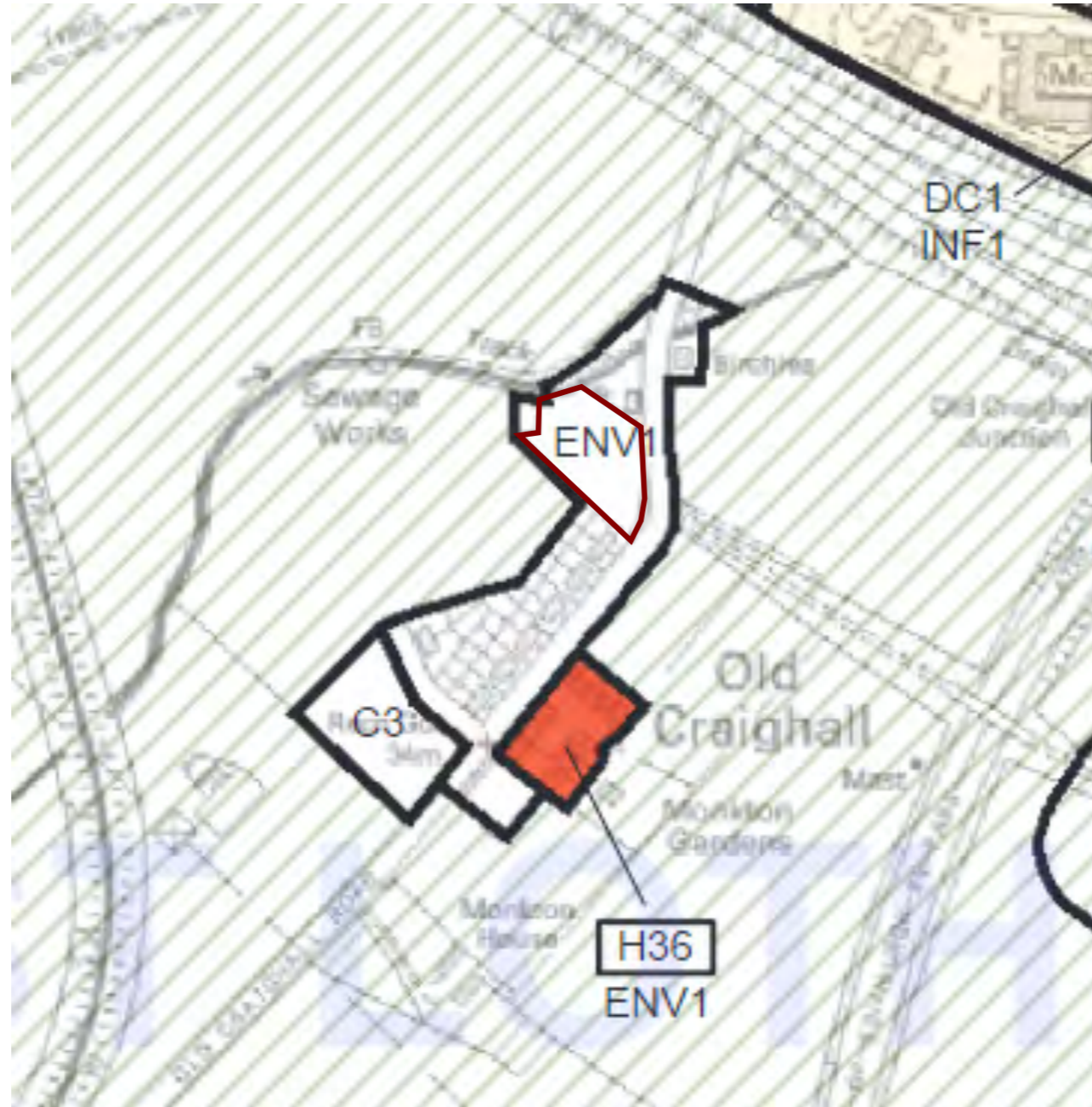
Modifications(s) Sought:

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 :

Location Plan- Local Plan Map Context.pdf was uploaded



Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-06 18:37:47**

About You

1 What is your name?

First name:

Justin

Surname:

Lamb

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

Justin Lamb Associates
4a Glenfinlas Street
Edinburgh

4 Please enter your postcode

Postcode:

EH3 6AQ

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

Developer/ agent/ landowner

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

Organisation:

Justin Lamb Associates

Your role:

Consultant for Ewan Rutherford

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

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:

Addition of extension to allocated housing site Proposal MH2 at Old Craighall and associated removal from Green Belt designation

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):

Introduction

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

The representation seeks to highlight the potential of a proposed extension of existing allocation Proposal MH2 at Old Craighall as an additional housing site within the Proposed LDP.

The site offers scope for local improvements in the form of new landscaped public open space, repair of existing stone walls and a range of private and affordable housing.

The land forms part of a wider area promoted via the LDP Main Issues Report stage (part ref.PM/MH/HSG056 and part within ref.SDP/MH/HSG003). A revised site boundary has been provided which combines a part of each of the above representations (included within supporting document sent by email).

It is considered that the site presents a small-scale but valuable extension of an existing effective housing site which can contribute towards East Lothian's 5 year supply of effective housing land.

The representation addresses the relevant Proposed LDP sections and seeks inclusion of the site as a housing allocation within the Proposed East Lothian Local Development Plan.

Proposed Site

The site comprises two parcels of land as indicated on Figure 1 within the supporting document (marked A and B and shown within the context of emerging LDP development proposals).

Area A extends to approximately 1 hectare (2.5 acres) and comprises rough grazing land (formerly walled garden) which sits on the south-western edge of Old Craighall, bound by existing housing and the proposed housing site MH2 to the east, by the B6415 Old Craighall Road to the north and stone wall to south and west.

Access is currently taken to the site from the B6415 which also serves as an access for Monkton Gardens, an existing residential unit.

Area B extends to approximately 2 hectares (5 acres) and comprises agricultural land which sits to the immediate south of Area A and is bound by the shared stone wall to the north, further stone wall to the west, the proposed housing site MH2 to the east and the landscape edge to the A720 City Bypass to the south.

This area would be accessed via an extension from proposed housing site MH2.

The proposal would consolidate the urban extension of Old Craighall which has been established by the existing housing allocation and the amalgamation with the larger Craighall development allocation to the north (which includes a new village centre adjoining Old Craighall within the associated LDP Development Brief).

The overall site capacity is approximately 30-40 units, subject to detailed design considerations.

Musselburgh Spatial Strategy and Development Considerations

In terms of the Spatial Strategy for the Musselburgh Cluster, the LDP proposes significant growth for this area including substantial expansion of Musselburgh to the south-west (Craighall) and Wallyford (extending existing allocation) and it is noted that both these major new allocations were rated negatively by the Council's own landscape assessment (LDP Environmental Report Appendix 5).

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 Old Craighall South is located within the preferred growth area and the proposal would have a negligible impact upon Green Belt objectives given the adjoining land allocations.

The proposed site provides an opportunity for extension of an existing housing allocation (ref.MH2), consolidation of urban form and landscape boundary at Old Craighall plus refurbishment of existing stone walls.

Initial discussions with AOC Archaeology Group (who undertook assessment of the adjacent approved housing site) have highlighted the heritage issues to be taken into consideration. As such, Figure 2 within the supporting document illustrates the proposals within an Indicative Design Framework for the proposed site.

In particular, Area A comprises a former walled garden and the proposals can allow for refurbishment of the walls which are dilapidated in parts (especially the frontage to Old Craighall Road).

The existing access from Old Craighall Road would be improved to provide a link to the existing Monkton Gardens property and an extension into the allocated housing site MH2 to the east. The remainder of the wall would be repaired as an existing feature with limited development in the eastern part of this area.

The remainder of Part A would provide for landscaped public open space which would provide a high quality landscape buffer (and retained open visual linkage) to the A Listed Monkton House. This area would also provide a local amenity asset.

Part B would complete the expansion of Old Craighall South and retain the stone wall boundary to the north/west with new landscaping creating a buffer to an identified scheduled monument (pit alignments identified as crop marks) on the south-western edge of this area plus a long term boundary. This site could be accessed via the adjoining allocated site MH2 without further impact upon the stone walls.

As such, the Traquair and Stewart family seek allocation of the proposed site as an extension to Proposal MH2 for inclusion within the Musselburgh Spatial Strategy and associated Table HOU1 and Inset Map 26 (Musselburgh). Allowing for design considerations to protect heritage assets and provide landscape planting, the site would provide scope for approximately 30-40 residential units.

Site Effectiveness

PAN2/2010 criteria for assessing site effectiveness provide a test against which sites require to be gauged with the land at Old Craighall South 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.

Status: Effective

Contamination

The site, given its undeveloped 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 30-40 units.

Status: Effective

Infrastructure

Utility connections and water and drainage connections are available to the site with financial contributions towards planned upgrading of education capacity able to be met by the developer.

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.

Summary

The landowners wish to highlight the potential of the proposed site as an extension of the existing allocation Proposal MH2 at Old Craighall.

The site offers scope for local improvements in the form of new landscaped public open space, repair of existing stone walls and a range of private and affordable housing.

The Indicative Design Framework outlines the proposed approach to integrating the site with Old Craighall, the adjoining housing allocation and existing heritage assets. In particular, there would remain a green landscape buffer between proposed development and Monkton House and the existing scheduled monument to the south-west could be protected.

The landowners therefore object to the current Musselburgh Cluster Spatial Strategy and seek removal of the proposed site from the existing Green Belt designation and inclusion as an allocated housing site at Old Craighall South for approximately 30-40 units with associated amendments to the Musselburgh inset map 26 and Table HOU1.

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:

Our client Mr Rutherford owns 1.05 acres of land at Old Craighall which is located within the village envelope within the adopted East Lothian Council Local Plan 2008. The land is located adjacent to Old Craighall Road directly between 1 Old Craighall Road and Stanmore (cottage) - see attached plan denoting the location of the site.

The land should be zoned for residential development either independent of PROP MH1 or as housing site as part of the PROP MH1 proposal.

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):

Our clients site is located in Old Craighall village directly between 1 Old Craighall Road and Stanmore (cottage).

The land is within the village envelope in the Adopted Local Plan and therefore in policy terms would be currently supported for housing subject to detailed design.

We have held initial discussions with planning and highways officials regarding the development of this land and received detailed feedback from planning on the site layout and development considerations that should be taken into account in any application. We have engaged with a developer and a detailed design for the site is being developed for submission as a planning application.

The MH1 designation brings the site into the much larger Persimmon Homes proposal and does not take account of the current designation or work that is ongoing at present.

Furthermore, the proposed Design Brief for the MH1 site zones our clients land as town centre zoning where a Primary School is required. We have had no communication from East Lothian Council or Persimmon Homes in relation to the proposed zoning of Mr Rutherford's land within the MH1 site.

We respectfully request that Mr Rutherford's land which is located within the existing settlement boundary be zoned for housing in line with its current housing and compatible uses status such that it can be brought forward in the short term as currently intended.

We are of course willing to discuss and work with East Lothian Council to ensure that the site layout is complimentary to the MH1 wider objectives.

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:

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):

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:

1b 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 :

Location Plan- Local Plan Map Context.pdf 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:

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):

Paragraph 3.31 – To reflect Scottish Planning Policy

Paragraphs 3.32 and 3.33 and 3.35 - It is considered that proposed programming of LDP sites is overly optimistic and a shortfall will still remain when assessed against SDP requirements.

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.

Table HOU2 - programming to be agreed with development industry / Homes for Scotland.

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):**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:

Addition of extension to allocated housing site Proposal MH2 at Old Craighall and associated removal from Green Belt designation, as per plan within emailed supporting document (extract attached 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 Musselburgh Cluster Strategy map above.

Visual Upload:

Old Craighall Site - location plan LDP.pdf was uploaded

Visual Upload:

Old Craighall - Indicative Design Framework.pdf was uploaded

Representation to
East Lothian Proposed Local Development Plan

In Support of
Old Craighall South

Prepared by
Clarendon Planning and Development Ltd

On behalf of
The Traquair & Stewart Families

November 2016



- 3 Introduction & Proposed Site**
- 4 Section 1: Aims, Objectives & Outcomes**
- 4 Section 2: Spatial Strategy**
- 5 Indicative Design Framework**
- 6 Section 3: Growing our Economy & Communities**
 - Planning for Housing
- 7 Environmental Report Appendix 5**
 - Site Assessment
- 8 Conclusions - A Deliverable Site:**
 - Site Effectiveness Summary
 - Summary

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

The representation seeks to highlight the potential of a proposed extension of existing allocation Proposal MH2 at Old Craighall as an additional housing site within the Proposed LDP.

The site offers scope for local improvements in the form of new landscaped public open space, repair of existing stone walls and a range of private and affordable housing.

The land forms part of a wider area promoted via the LDP Main Issues Report stage (part ref.PM/MH/HSG056 and part within ref.SDP/MH/HSG003). A revised site boundary has been provided which combines a part of each of the above representations.

It is considered that the site presents a small-scale but valuable extension of an existing effective housing site which can contribute towards East Lothian's 5 year supply of effective housing land.

The representation addresses the relevant Proposed LDP sections and seeks inclusion of the site as a housing allocation within the Proposed East Lothian Local Development Plan.

The site comprises two parcels of land as indicated on **Figure 1** (marked **A** and **B** and shown within the context of emerging LDP development proposals).

Area A extends to approximately 1 hectare (2.5 acres) and comprises rough grazing land (formerly walled garden) which sits on the south-western edge of Old Craighall, bound by existing housing and the proposed housing site MH2 to the east, by the B6415 Old Craighall Road to the north and stone wall to south and west.

Access is currently taken to the site from the B6415 which also serves as an access for Monkton Gardens, an existing residential unit.

Area B extends to approximately 2 hectares (5 acres) and comprises agricultural land which sits to the immediate south of Area A and is bound by the shared stone wall to the north, further stone wall to the west, the proposed housing site MH2 to the east and the landscape edge to the A720 City Bypass to the south.

This area would be accessed via an extension from proposed housing site MH2.

The proposal would consolidate the urban extension of Old Craighall which has been established by the existing housing allocation and the amalgamation with the larger Craighall development allocation to the north (which includes a new village centre adjoining Old Craighall within the associated LDP Development Brief).

The overall site capacity is approximately 30-40 units, subject to detailed design considerations.

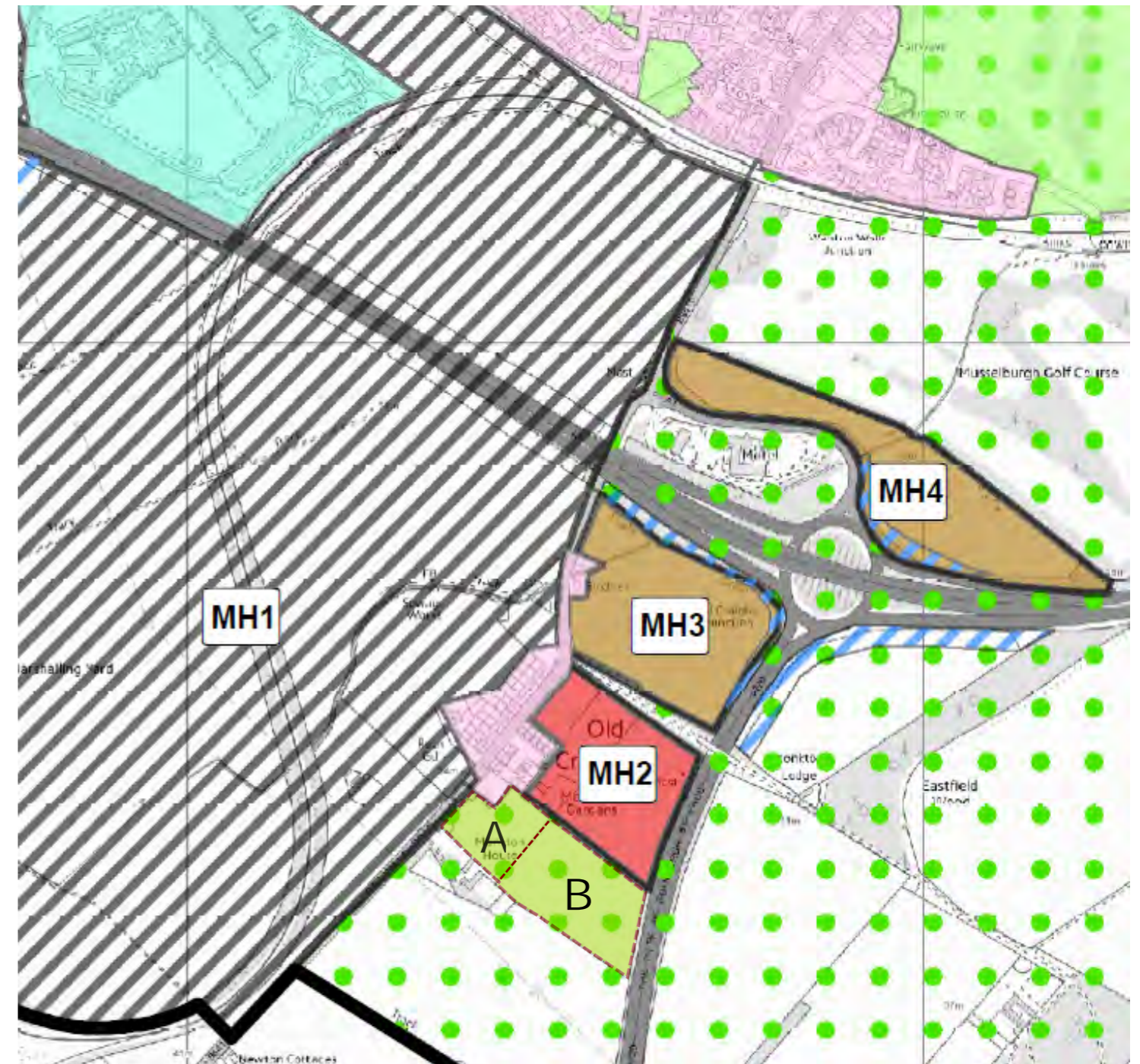


Figure 1 - Site boundary: Old Craighall South

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 Old Craighall, the proposed site is adjacent to the village centre (which will be expanded by new proposals for the adjoining Craighall mixed-use allocation) and an existing bus route.

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

This objective is supported. The proposed housing site at Old Craighall will address this objective by virtue of providing additional housing 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 Old Craighall does not sit within a Special Landscape Area and proposals can be sensitively design to accommodate existing heritage assets.

- Ensure adequate infrastructure capacity and an appropriate use of resources

This objective is supported. It is noted that the LDP provides for extended education capacity in the Old Craighall area. Vehicular access can be provided and the site can contribute proportionally to wider transport impact requirements.

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 including substantial expansion of Musselburgh to the south-west (Craighall) and Wallyford (extending existing allocation) and it is noted that both these major new allocations were rated negatively by the Council's own landscape assessment (LDP Environmental Report Appendix 5).

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 Old Craighall South is located within the preferred growth area and the proposal would have a negligible impact upon Green Belt objectives given the adjoining land allocations.

The proposed site provides an opportunity for extension of an existing housing allocation (ref. MH2), consolidation of urban form and landscape boundary at Old Craighall plus refurbishment of existing stone walls.

Initial discussions with AOC Archaeology Group (who undertook assessment of the adjacent approved housing site) have highlighted the heritage issues to be taken into consideration. As such, **Figure 2** illustrates the proposals within an Indicative Design Framework for the proposed site.

In particular, Area A comprises a former walled garden and the proposals can allow for refurbishment of the walls which are dilapidated in parts (especially the frontage to Old Craighall Road).

The existing access from Old Craighall Road would be improved to provide a link to the existing Monkton Gardens property and an extension into the allocated housing site MH2 to the east. The remainder of the wall would be repaired as an existing feature with limited development in the eastern part of this area.

The remainder of Part A would provide for landscaped public open space which would provide a high quality landscape buffer (and retained open visual linkage) to the A Listed Monkton House. This area would also provide a local amenity asset.

Part B would complete the expansion of Old Craighall South and retain the stone wall boundary to the north/west with new landscaping creating a buffer to an identified scheduled monument (pit alignments identified as crop marks) on the south-western edge of this area plus a long term boundary. This site could be accessed via the adjoining allocated site MH2 without further impact upon the stone walls.

As such, the Traquair and Stewart family seek allocation of the proposed site as an extension to Proposal MH2 for inclusion within the Musselburgh Spatial Strategy and associated Table HOU1 and Inset Map 26 (Musselburgh).

Allowing for design considerations to protect heritage assets and provide landscape planting, the site would provide scope for approximately 30-40 residential units.

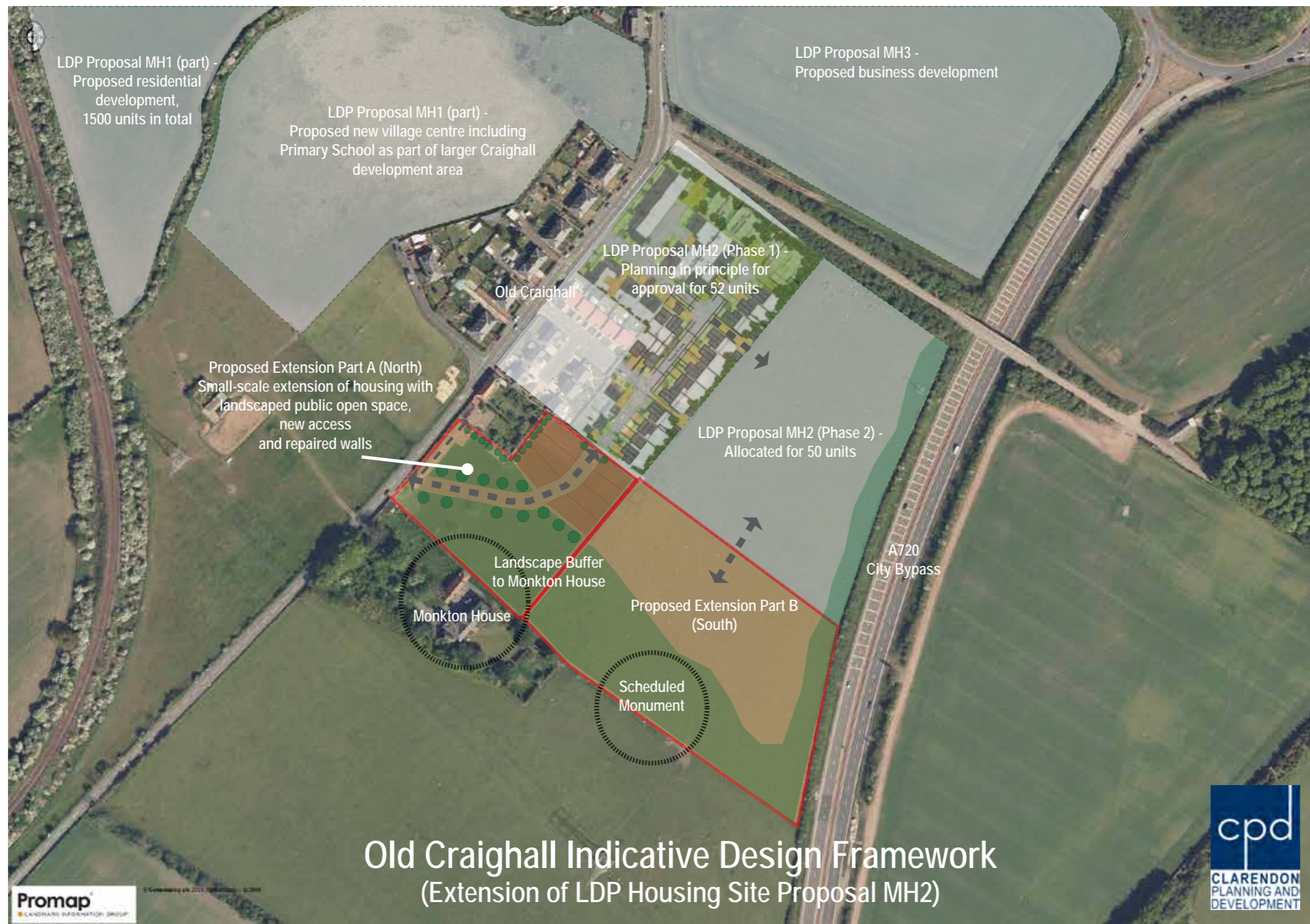


Figure 2 - Indicative Design Framework: Old Craighall South

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.

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.

Proposed Site in relation to Policy HOU2

Notwithstanding the objection to the current wording of Policy HOU2, the proposed site at Old Craighall South can be assessed positively against the proposed criteria:

- 1. Location** - Site is an extension of an existing settlement within the East Lothian Strategic Development Area.
- 2. Effectiveness** - Site is owned by willing seller and 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.
- 4. Timing** - The site 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.

Proposed LDP Environmental Report Appendix 5

Site Assessment: Old Craighall South

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 partly included within ref.PM/MH/HSG056 (Part A) and partly within ref.SDP/MH/HSG003 (Part B) site ref.MIR/TT/HSG132 within Appendix 5 of the Environmental Report (Pages 82-91).

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 that Part A site is well located to the existing settlement. Part B is rated negatively but as part of a wider landholding promoted which has now been reduced. **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 existing development and treebelts provide shelter, which could be extended southwards. **Considered this should 'positive'.**

Suitability for Proposed Use

- The assessment notes that the proposed site would be physically suitable but notes noise concerns from the A720 - noise surveys were undertaken for the adjoining allocated site with mitigation measures. **Considered this should '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 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 access can be physically achieved. Water treatment and waste water treatment capacity exists. **Considered this should 'positive'.**

Service Infrastructure Capacity

- The assessment notes the potential extension of capacity for primary and secondary schools. **Considered this should 'positive'.**

Deliverability/Effectiveness

- The assessment notes that land is control of housebuilder but infrastructure capacity has to be confirmed. **Considered this should 'positive'.**

Biodiversity, flora & fauna

- The assessment notes the site is not within any areas designated for their international, national or local nature conservation areas. The site is around 2.5 km from the Firth of Forth SPA and bird surveys would be required. There is an opportunity for habitat connectivity improvement. **Considered this should 'positive'.**

Population

- The assessment notes the site would provide housing, including an element of affordable housing to help meet local need. 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 mitigation measures for any previous site contamination and noise impact from the A720 would be required. The site is close to existing open space and paths. **Considered 'neutral'.**

Soil

- The development of the site would result in some loss of 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 requirement for Flood Risk and drainage assessment but is not subject to flood risk. **Considered 'neutral'.**

Air

- Development on the site would not be affected by existing sources of air pollution and the site would have reasonable public transport accessibility. **Considered 'neutral'.**

Climatic Factors

- The assessment notes the risk of car-based journeys to increase emissions but close proximity to public transport connections. **Considered 'neutral'.**

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 concern over impact on the A Listed Monkton House and the presence of a scheduled monument on the south-western boundary. Part B of the site formed part of a wider area that was deemed to have a negative impact but this boundary has now been reduced. As detailed within the representation, initial archaeology and heritage assessment and associated mitigation measures has been incorporated into an Indicative Design Framework submitted with the representation. **Considered 'neutral'.**

Landscape

- The assessment notes visibility from the A1 but less so from the A720 due to levels and landscaping. Part A is considered a logical extension of the settlement and the former walled garden area clearly benefits from containment. Part B formed part of a wider landholding and the reduced boundary can reflect landscape proposals for allocated site MH2. **Considered that constraints are capable of being overcome with suitable landscape design as detailed within the Indicative Design Framework included with this representation.**

Overall

- The proposed site would extend an existing allocated housing site and consolidate the urban form of the village of Old Craighall. Sensitive design can allow for existing heritage assets to be protected and creation of a long term settlement edge 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 Old Craighall South 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.
Status: **Effective**

Contamination

The site, given its undeveloped 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 30-40 units.
Status: **Effective**

Infrastructure

Utility connections and water and drainage connections are available to the site with financial contributions towards planned upgrading of education capacity able to be met by the developer.
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.

Summary

The landowners wish to highlight the potential of the proposed site as an extension of the existing allocation Proposal MH2 at Old Craighall.

The site offers scope for local improvements in the form of new landscaped public open space, repair of existing stone walls and a range of private and affordable housing.

The Indicative Design Framework outlines the proposed approach to integrating the site with Old Craighall, the adjoining housing allocation and existing heritage assets. In particular, there would remain a green landscape buffer between proposed development and Monkton House and the existing scheduled monument to the south-west could be protected.

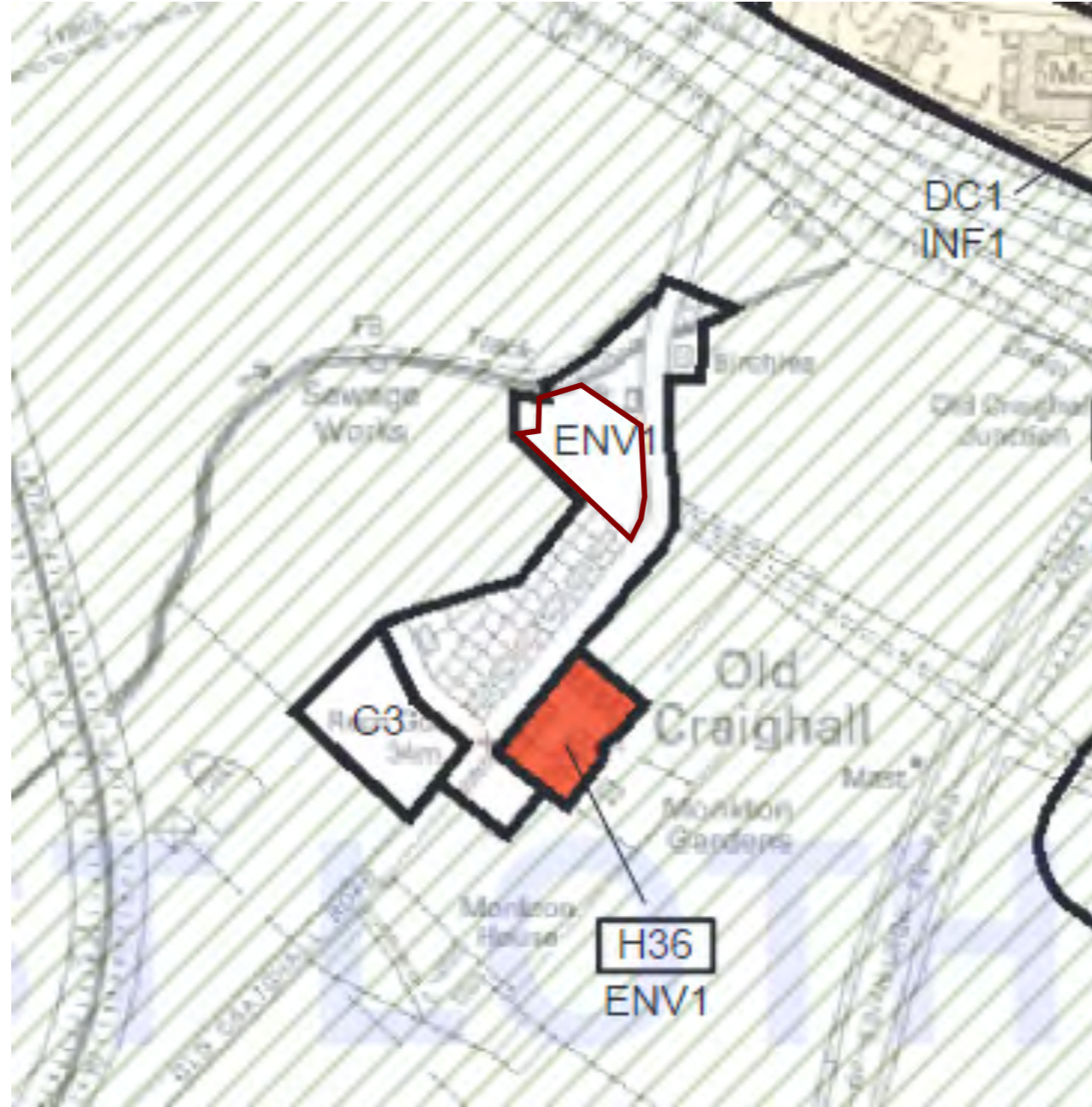
The landowners therefore object to the current Musselburgh Cluster Spatial Strategy and seek removal of the proposed site from the existing Green Belt designation and inclusion as an allocated housing site at Old Craighall South for approximately 30-40 units with associated amendments to the Musselburgh inset map 26 and Table HOU1.

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LDP Proposal MH1 (part) -
Proposed residential
development,
1500 units in total

LDP Proposal MH1 (part) -
Proposed new village centre including
Primary School as part of larger Craighall
development area

LDP Proposal MH3 -
Proposed business development

LDP Proposal MH2 (Phase 1) -
Planning in principle for
approval for 52 units

Old Craighall

Proposed Extension Part A (North)
Small-scale extension of housing with
landscaped public open space,
new access
and repaired walls

LDP Proposal MH2 (Phase 2) -
Allocated for 50 units

Landscape Buffer
to Monkton House

Monkton House

Proposed Extension Part B
(South)

Scheduled
Monument

A720
City Bypass

Old Craighall Indicative Design Framework (Extension of LDP Housing Site Proposal MH2)

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-06 18:47:40**

About You

1 What is your name?

First name:

Name

Surname:

Scott

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

[REDACTED]

4 Please enter your postcode

Postcode:

[REDACTED]

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

Local resident/member of the public

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

Organisation:

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::

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

1a What modifications do you wish to see made to the Strategy map for the Prestonpans/Cockenzie/Port Seton/Longniddry Cluster? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question. Do you have any comments to make on the

Modifications(s) Sought :

Reference EGT1 should be applied to the former Power Station Energy footprint only - not to the surrounding land, which should retain its designation as Public Open Space and Countryside.

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

Justification for Modification(s) :

The area shown on the map accompanying the Local Development Plan (inset Map 32) extends well beyond the site of the former energy footprint of Cockenzie Power Station. The majority of this land is currently designated, in the East Lothian Local Plan 2008, as Countryside (DC1) or Public Open Space (C3). The land associated with power generation extends to the areas of land covered by the main power station building, transformer building, coal plant and the coal conveyor buildings. This is the site allocated in the adopted 2008 local plan as NRG1.

The proposed changes are not a requirement of National Planning Framework 3 and appear to be seeking to extend the boundaries of the former Power Station site.

Section 2b - Introduction to Prestonpnas/Cockenzie/Port Seton/ Longniddry (pg 24)

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

Modifications(s) Sought:

2.49 ELC should modify the LDP to accommodate the dispersed spatial strategy - rather than the compact strategy.

2.51 Port-related developments should be removed from potential developments.

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

Justification for Modification(s):

2.49 The Preferred Approach of compact spatial strategy - concentrating development in the west of the county risks removing much of the public and amenity land for the existing communities.

2.51 Energy related uses, manufacturing, servicing and potentially port related developments are not compatible with the dense residential strategy being proposed under the Plan or with the existing rural residential nature of the area.

I would ask that ELC uphold their views at paragraphs 2.55 & 2.56 with regard to Strategic Landscape Mitigation where they state '2.55 There are areas of land outwith the green belt that are also under development pressure. These are between Prestonpnas, Cockenzie, the allocated land at Blindwells and Tranent. Development in these locations would lead to the coalescence of settlements, undermine their character and setting, compromise cultural heritage assets, including battlefields, and / or lead to the loss of the best prime quality agricultural land. The combination of these environmental constraints points to a need to restrain further built development here which, individually or cumulatively, would undermine related objectives. A Countryside Around Town Designation applies to land between these neighbouring settlements. Around Town Designation, to ensure Prestonpnas, Cockenzie, Tranent, Blindwells and Longniddry retain their separate identities. This will provide active travel opportunities to link communities, growth areas and places beyond them together. Opportunities for recreation and habitat creation and connection will be delivered as part of the multifunctional Green Network. 2.56 Strategic Green Network opportunities will be delivered, including within the Countryside.'

Additionally paragraph 2.57 states that 'The site of the Battle of Prestonpnas is designated, as identified by the National Inventory.' Please may this remain so - and it is not designated for industrial use.

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-06 18:49:12**

About You

1 What is your name?

First name:

Fiona

Surname:

Docherty

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

[REDACTED]

[REDACTED]

4 Please enter your postcode

Postcode:

[REDACTED]

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

Local resident/member of the public

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

Organisation:

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::

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 2d - Tranent Cluster Main Development Proposals

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

Modifications(s) Sought:

Para 2.90 Reduce the proposed number of new houses.

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

Justification for Modification(s):

Facilities in Tranent for example GP services are already stretched to capacity. At present waiting times for a routine GP appointment are at least 4 weeks. It can be extremely difficult to access facilities such as sports clubs for children. The services and shops on the high street are not adequate for the population increase. Public transport services are also limited with only 1 service covering this area on a regular basis and taking a protracted route which means long journeys into Edinburgh. The traffic at peak times is also considerable and it is my belief that road improvements e.g., the A1 link should be made prior to any increase in housing.

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

Modifications(s) Sought:

Windygoul Primary school should not be extended.

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

Justification for Modification(s) :

The school has already been extended twice since it was opened. Numbers at the school are very large and although staff do an excellent job there is a risk of the numbers becoming overwhelming both from a management point of view and for the children in such a huge school. Building another primary school in Tranent would be a more acceptable option.

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

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

Justification for Modification(s):

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-06 19:03:22**

About You

1 What is your name?

First name:

Antony

Surname:

Duthie

2 What is your email address?

Email address:

3 Postal Address

Address:

Clarendon Planning & Development Ltd
5a Castle Terrace
Edinburgh
EH1 2DP

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:

Agent for landowner

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

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:

Deletion of Countryside Around Towns designation from the area north-east of Ormiston

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) :

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.

It is considered that the existing Countryside designation provides sufficient protection without putting in place similar restrictions as a Green Belt designation.

The LDP Technical Note 8 - Countryside Around Towns, sets out the specific reasoning for certain areas including the north-east of Ormiston. Whilst not being

promoted for development, this land may offer the only long term expansion opportunity for the village, subject to access, landscape and design considerations being addressed.

This objection therefore relates to the overly restrictive of the proposed policy designation which does not allow for suitable mitigation measures or inclusion of non-developable areas should long term growth of Ormiston require to be accommodated.

Visual Upload:

No file was uploaded

Visual Upload:

No file was uploaded

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on 2016-11-06 19:26:16

About You

1 What is your name?

First name:
JONATHAN

Surname:
SWIFT

2 What is your email address?

Email address:
[REDACTED]

3 Postal Address

Address:
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

4 Please enter your postcode

Postcode:
[REDACTED]

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

Community Council

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

Organisation:
DUNPENDER COMMUNITY COUNCIL

Your role:
SECRETARY

7 Are you supporting the plan?

Not Answered

If Yes: Please include your reasons for support:

UNDECIDED

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 2f - Dunbar Cluster Strategy Map (pg 45)

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

Modifications(s) Sought:

RESPONSE TO STRATEGY FROM DUNPENDER COMMUNITY COUNCIL:

We agree with ELC's assessment of no preferred development in East Linton, and would not want to see large scale development imposed upon anywhere in our Dunpender Community Council Ward. Development over the years has been gradual and has integrated well and we recognise that limited new building can bring new families to keep our school, shops and businesses open, as well as the many voluntary and social activities without destroying the character of our environment. In past consultations we suggested a limit of 150 new houses in total for our whole area over the timescales given in the Main Issues Report and previous LDP; we continue to support this position.

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

Justification for Modification(s) :

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

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

Modifications(s) Sought:

DUNPENDER COMMUNITY COUNCIL BELIEVES THAT LAND ADJACENT TO EAST LINTON AND GIVEN POTENTIAL FOR DEVELOPMENT (PENCRAIG/ORCHARDFIELD SITE) SHOULD BE REASSESSED AND CLASSIFIED AS "DC8". INSET MAP 12 - EAST LINTON DUNBAR CLUSTER. PAGE 53

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

Justification for Modification(s):

TO PROTECT THE ENVIRONMENT, HERITAGE, CHARACTER AND LANDSCAPE VALUE OF EAST LINTON.

PAGE 53

INSET MAP 12 - EAST LINTON

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

1a PROP DR1: Hallhill South West, Dunbar - What modifications do you wish to see made to Prop DR1 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

1b Please give any information/reasons in support of each modification suggested to Prop DR1 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

2a PROP DR2: Hallhill North, Dunbar - What modifications do you wish to see made to Prop DR2 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

2b Please give any information/reasons in support of each modification suggested to Prop DR2 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

3a PROP DR3: Hallhill Healthy Living Centre Expansion Land - What modifications do you wish to see made to Prop DR3 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

3b Please give any information/reasons in support of each modification suggested to Prop DR3 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

4a PROP DR4: Brodie Road, Dunbar - What modifications do you wish to see made to Prop DR4 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

4b Please give any information/reasons in support of each modification suggested to Prop DR4 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

5a PROP DR5: Land at Newtonlees, Dunbar - What modifications do you wish to see made to Prop DR5 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

5b Please give any information/reasons in support of each modification suggested to Prop DR5 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

6a PROP DR6: Beveridge Row Belhaven, Dunbar - What modifications do you wish to see made to Prop DR6 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

6b Please give any information/reasons in support of each modification suggested to Prop DR6 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

7a PROP DR7: Land at Spott Road, Dunbar - What modifications do you wish to see made to Prop DR7 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

7b Please give any information/reasons in support of each modification suggested to Prop DR7 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

8a PROP DR8: Pencraighill, East Linton - What modifications do you wish to see made to Prop DR8 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

THAT THE SITE IS REASSESSED AND GIVEN "DC8" STATUS

8b Please give any information/reasons in support of each modification suggested to Prop DR8 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

TO PROTECT THE ENVIRONMENT, HERITAGE, CHARACTER, AND LANDSCAPE OF EAST LINTON.

PAGE 53

INSET MAP12

9a PROP DR9: Land at East Linton Auction Mart - What modifications do you wish to see made to Prop DR9 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

NONE SOUGHT AS DUNPENDER COMMUNITY COUNCIL SUPPORTS THIS DEVELOPMENT.

9b Please give any information/reasons in support of each modification suggested to Prop DR9 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

10a PROP DR10: Innerwick East, Innerwick - What modifications do you wish to see made to Prop DR10 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

10b Please give any information/reasons in support of each modification suggested to Prop DR10 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

11a PROP DR11: St John's Road, Spott - What modifications do you wish to see made to Prop DR11 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

11b Please give any information/reasons in support of each modification suggested to Prop DR11 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

12a Policy DR12: Development Briefs - What modifications do you wish to see made to Policy DR12 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

12b Please give any information/reasons in support of each modification suggested to Prop DR12 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

Additional Comments

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:

DUNPENDER COMMUNITY COUNCIL WISHES TO HIGHLIGHT POTENTIAL PROBLEMS WITH THE PROPOSED BURIAL SITE IN WHITEKIRK.

INSET MAP 38

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

Justification for Modification(s):

DUNPENDER COMMUNITY COUNCIL SUPPORTS THE CONCERNS OF THE WHITEKIRK COMMUNITY COMPANY TO THE PROPOSED BURIAL SITE GIVEN BELOW:

"Local development plan: proposal for development at land at Glebe Field to the south of Whitekirk (PROP OS5)

The Directors of the Company are concerned that:

No consultation with the community has taken place regarding the proposals

The location of the site is too remote from the existing Kirk churchyard

The size of the proposed site is inappropriately large for the likely need

The proposed site is currently greenfield, the development of which will require related amenities – car parking etc – that would be an inappropriate visual intrusion to a conservation village".

INSET MAP 38 - WHITEKIRK

Please note - Could not find this proposed site listed in the LDP. Not listed under North Berwick nor Dunbar Clusters.

File upload:

No file was uploaded

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on 2016-11-06 19:33:20

About You

1 What is your name?

First name:

Chris

Surname:

Bruce

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

[REDACTED]

[REDACTED]

4 Please enter your postcode

Postcode:

[REDACTED]

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

Community Council

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

Organisation:

East lammermuir Community Council

Your role:

Chair

7 Are you supporting the plan?

Not Answered

If Yes: Please include your reasons for support:

Please see letter below:

East Lothian's Proposed Local Development Plan

Comments from East Lammermuir Community Council

October 2016

East Lammermuir Community Council welcomes the chance to comment on the Local Development Plan, and members discussed the report at our meeting on Tuesday 25th October 2016. This followed a number of previous discussions about specific issues in the report - both amongst us as Community Council members, and with other local residents.

The Community Council wishes to make the following contribution to the consultation:

Firstly, we wish to note that the Council chose to consult on this key document over a period of time which included the Community Council elections. This was presumably a decision that the council took knowingly. It undermines our capacity as statutory consultees to make full and informed comments, as for a significant part of the consultation period we could not meet in a formal capacity, and were not officially community councillors until our first scheduled meeting – which fell 7 days before the deadline for comments.

We feel that this displays a deliberate disrespect for our voluntary roles as community councillors, and would ask the council to avoid such an obvious clash of timetabling in future.

East Lammermuir is an entirely rural area with four main villages. Our opportunities to consider the LDP have been limited by the community council elections, and so we have decided to limit our comments to primarily focus on housing.

As was the case for the Main Issues Report, (that time in Stenton), it appears that land proposed for housing was allocated thus in the LDP without any discussion (be that consultation or even just advice) with the landowners (this time in Innerwick). We do not think this is acceptable and would ask the council to advise us how this will be avoided in future – please.

Turning to our local issues, we begin with reference to the two villages where additional housing land is proposed.

Innerwick

Do we support the proposed housing allocation in Innerwick?

Our meeting on 25th October was attended by 23 residents of Innerwick. This represents perhaps 1 in 5 of the adult population of the village. The Community Council undertook to represent those present and object to the allocation of the land North of Kirk Brae for housing. Concerns were expressed re infrastructure: sewage, water supplies, transport, road safety.

However, we do want to push for the remaining (affordable?) housing at Temple Mains Steading to be built. The Monitoring Statement incorrectly lists this development as complete (para 158, figure 60, H33).

Spott

Do we support the proposed housing allocation in Spott?

No, local community councillors have fed in their view that this is the wrong location, and there are more suitable sites at the edge of Spott Village itself. ELCC wishes to object to this allocation.

We also wish to query to how many houses are actually planned for consent to build, 6 or 10? There are references to both numbers at different points in the LDP.

All of the proposed allocations for housing in East Lammermuir are perhaps aimed at traditional housing developers. East Lammermuir Community Council wishes to ask the following questions with regard to allocating land for housing, and we would appreciate a detailed response from the council:

Are any other places within settlements (villages or smaller hamlets) where housing could be made available for self-build including cooperatives? Is there any way land could be made available for co-housing groups?

Are any other places within Spott, and Oldhamstocks where housing could be sympathetically built e.g. as in II? We think there might be.

How can we ensure future building to be of a really high quality, with a low carbon impact e.g.. Passivhaus standard?

How can we ensure that new housing meets local people's needs and preserves and encourages the diversity of the villages? Related to this question, can someone tell us what the Council understands about housing need in East Lammermuir? Can we discuss this with a council representative please?

Could there be any way of asking developers to offer construction apprenticeships?

Is there any housing/or a means of offering support with renovations - for people who become elderly and infirm?

Looking more broadly, the Community Council wishes to raise these related points/queries.

How would the proposed expansion of Dunbar affect traffic and public transport, particularly on the A1?

Increased amount of traffic.

With respect to motor vehicles; East Lammermuir Community Council sees the improvement of safety at junctions on the A1 between Spott Road and Cockburnspath as a priority.

With respect to rail; there is discussion of a new track, platform and bridge at Dunbar station.

Why have contributions by developers to transport not been included as well as to education?

If (contrary to our recommendations) the proposed housing in Innerwick and Spott are to proceed, could there be a proposed contribution figure towards primary education to be included in the LDP for each of these developments?

We note that the Local Development Plan is virtually silent on Health Centres and hospitals, despite the duty on the Council and NHS Board from April 2015 to produce a Strategic Plan for all health and care in East Lothian through an Integration Joint Board. Is it really still acceptable to omit these matters from the Local Development Plan?

Finally, we feel that more emphasis should be given to supporting infrastructure for employers and businesses in rural settings. This may be as simple as high speed broadband for people working at home, through to an emphasis on providing for flexible office and workshop space in community facilities in the villages and surrounding countryside. Only by shifting more employment nearer to the villages can we reduce our reliance on transport and therefore reduce our energy consumption and increase sustainability of these relatively fragile communities.

East Lammermuir Community Council
30th October 2016

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

1a PROP DR1: Hallhill South West, Dunbar - What modifications do you wish to see made to Prop DR1 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

1b Please give any information/reasons in support of each modification suggested to Prop DR1 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

2a PROP DR2: Hallhill North, Dunbar - What modifications do you wish to see made to Prop DR2 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

2b Please give any information/reasons in support of each modification suggested to Prop DR2 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

3a PROP DR3: Hallhill Healthy Living Centre Expansion Land - What modifications do you wish to see made to Prop DR3 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

3b Please give any information/reasons in support of each modification suggested to Prop DR3 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

4a PROP DR4: Brodie Road, Dunbar - What modifications do you wish to see made to Prop DR4 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

4b Please give any information/reasons in support of each modification suggested to Prop DR4 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

5a PROP DR5: Land at Newtonlees, Dunbar - What modifications do you wish to see made to Prop DR5 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

5b Please give any information/reasons in support of each modification suggested to Prop DR5 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

6a PROP DR6: Beveridge Row Belhaven, Dunbar - What modifications do you wish to see made to Prop DR6 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

6b Please give any information/reasons in support of each modification suggested to Prop DR6 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

7a PROP DR7: Land at Spott Road, Dunbar - What modifications do you wish to see made to Prop DR7 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

7b Please give any information/reasons in support of each modification suggested to Prop DR7 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

8a PROP DR8: Pencraighill, East Linton - What modifications do you wish to see made to Prop DR8 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

8b Please give any information/reasons in support of each modification suggested to Prop DR8 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

9a PROP DR9: Land at East Linton Auction Mart - What modifications do you wish to see made to Prop DR9 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

9b Please give any information/reasons in support of each modification suggested to Prop DR9 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s) :

10a PROP DR10: Innerwick East, Innerwick - What modifications do you wish to see made to Prop DR10 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

We do not wish to see this land allocated as suitable for housing

If the allocation proceeds we wish to see proposed developer contribution figures for Primary Education and for Transport infrastructure costs

10b Please give any information/reasons in support of each modification suggested to Prop DR10 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

Our East Lammermuir Community Council meeting on 25th October was attended by 23 residents of Innerwick. This represents perhaps 1 in 5 of the adult population of the village. The Community Council undertook to represent those present and object to the allocation of the land North of Kirk Brae for housing. Concerns were expressed re infrastructure: sewage, water supplies, transport, road safety.

However, we do want to push for the remaining (affordable?) housing at Temple Mains Steading to be built. The Monitoring Statement incorrectly lists this development as complete (1, para 158, figure 60, H33).

11a PROP DR11: St John's Road, Spott - What modifications do you wish to see made to Prop DR11 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

We do not wish to see the land at St John's Road allocated for housing

We wish to clarify whether the proposal is for 6 or 10 units

We wish to see proposed developer contribution figures for Primary Education and for Transport infrastructure costs

11b Please give any information/reasons in support of each modification suggested to Prop DR11 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

Spott Community Councillors made this proposal to the community council on behalf of local residents who feel that there are more appropriate sites at Spott.

12a Policy DR12: Development Briefs - What modifications do you wish to see made to Policy DR12 of the proposed Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

12b Please give any information/reasons in support of each modification suggested to Prop DR12 of the proposed Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

Additional Comments

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:

Please see letter below:

East Lothian's Proposed Local Development Plan

Comments from East Lammermuir Community Council

October 2016

East Lammermuir Community Council welcomes the chance to comment on the Local Development Plan, and members discussed the report at our meeting on Tuesday 25th October 2016. This followed a number of previous discussions about specific issues in the report - both amongst us as Community Council members, and with other local residents.

The Community Council wishes to make the following contribution to the consultation:

Firstly, we wish to note that the Council chose to consult on this key document over a period of time which included the Community Council elections. This was presumably a decision that the council took knowingly. It undermines our capacity as statutory consultees to make full and informed comments, as for a significant part of the consultation period we could not meet in a formal capacity, and were not officially community councillors until our first scheduled meeting – which fell 7 days before the deadline for comments.

We feel that this displays a deliberate disrespect for our voluntary roles as community councillors, and would ask the council to avoid such an obvious clash of timetabling in future.

East Lammermuir is an entirely rural area with four main villages. Our opportunities to consider the LDP have been limited by the community council elections, and so we have decided to limit our comments to primarily focus on housing.

As was the case for the Main Issues Report, (that time in Stenton), it appears that land proposed for housing was allocated thus in the LDP without any discussion (be that consultation or even just advice) with the landowners (this time in Innerwick). We do not think this is acceptable and would ask the council to advise us how this will be avoided in future – please.

Turning to our local issues, we begin with reference to the two villages where additional housing land is proposed.

Innerwick

Do we support the proposed housing allocation in Innerwick?

Our meeting on 25th October was attended by 23 residents of Innerwick. This represents perhaps 1 in 5 of the adult population of the village. The Community Council undertook to represent those present and object to the allocation of the land North of Kirk Brae for housing. Concerns were expressed re infrastructure: sewage, water supplies, transport, road safety.

However, we do want to push for the remaining (affordable?) housing at Temple Mains Steading to be built. The Monitoring Statement incorrectly lists this development as complete (para 158, figure 60, H33).

Spott

Do we support the proposed housing allocation in Spott?

No, local community councillors have fed in their view that this is the wrong location, and there are more suitable sites at the edge of Spott Village itself. ELCC wishes to object to this allocation.

We also wish to query to how many houses are actually planned for consent to build, 6 or 10? There are references to both numbers at different points in the LDP.

All of the proposed allocations for housing in East Lammermuir are perhaps aimed at traditional housing developers. East Lammermuir Community Council wishes to ask the following questions with regard to allocating land for housing, and we would appreciate a detailed response from the council:

Are any other places within settlements (villages or smaller hamlets) where housing could be made available for self-build including cooperatives? Is there any way land could be made available for co-housing groups?

Are any other places within Spott, and Oldhamstocks where housing could be sympathetically built e.g. as in II? We think there might be.

How can we ensure future building to be of a really high quality, with a low carbon impact e.g.. Passivhaus standard?

How can we ensure that new housing meets local people's needs and preserves and encourages the diversity of the villages? Related to this question, can someone tell us what the Council understands about housing need in East Lammermuir? Can we discuss this with a council representative please?

Could there be any way of asking developers to offer construction apprenticeships?

Is there any housing/or a means of offering support with renovations - for people who become elderly and infirm?

Looking more broadly, the Community Council wishes to raise these related points/queries.

How would the proposed expansion of Dunbar affect traffic and public transport, particularly on the A1?

Increased amount of traffic.

With respect to motor vehicles; East Lammermuir Community Council sees the improvement of safety at junctions on the A1 between Spott Road and Cockburnspath as a priority.

With respect to rail; there is discussion of a new track, platform and bridge at Dunbar station.

Why have contributions by developers to transport not been included as well as to education?

If (contrary to our recommendations) the proposed housing in Innerwick and Spott are to proceed, could there be a proposed contribution figure towards primary education to be included in the LDP for each of these developments?

We note that the Local Development Plan is virtually silent on Health Centres and hospitals, despite the duty on the Council and NHS Board from April 2015 to produce a Strategic Plan for all health and care in East Lothian through an Integration Joint Board. Is it really still acceptable to omit these matters from the Local Development Plan?

Finally, we feel that more emphasis should be given to supporting infrastructure for employers and businesses in rural settings. This may be as simple as high speed broadband for people working at home, through to an emphasis on providing for flexible office and workshop space in community facilities in the villages and surrounding countryside. Only by shifting more employment nearer to the villages can we reduce our reliance on transport and therefore reduce our energy consumption and increase sustainability of these relatively fragile communities.

East Lammermuir Community Council
30th October 2016

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

Justification for Modification(s):

File upload:

ELCC - comments on East Lothian Development Plan October 2016.docx was uploaded

East Lothian's Proposed Local Development Plan

Comments from East Lammermuir Community Council

October 2016

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We feel that this displays a deliberate disrespect for our voluntary roles as community councillors, and would ask the council to avoid such an obvious clash of timetabling in future.

East Lammermuir is an entirely rural area with four main villages. Our opportunities to consider the LDP have been limited by the community council elections, and so we have decided to limit our comments to primarily focus on housing.

As was the case for the Main Issues Report, (that time in Stenton), it appears that land proposed for housing was allocated thus in the LDP without any discussion (be that consultation or even just advice) with the landowners (this time in Innerwick). We do not think this is acceptable and would ask the council to advise us how this will be avoided in future – please.

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However, we do want to push for the remaining (affordable?) housing at Temple Mains Steading to be built. The Monitoring Statement incorrectly lists this development as complete (para 158, figure 60, H33).

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Do we support the proposed housing allocation in Spott?

No, local community councillors have fed in their view that this is the wrong location, and there are more suitable sites at the edge of Spott Village itself. ELCC wishes to **object** to this allocation.

We also wish to query to how many houses are actually planned for consent to build, 6 or 10? There are references to both numbers at different points in the LDP.

All of the proposed allocations for housing in East Lammermuir are perhaps aimed at traditional housing developers. East Lammermuir Community Council wishes to ask the following questions with regard to allocating land for housing, and we would appreciate a detailed response from the council:

Are any other places within settlements (villages or smaller hamlets) where housing could be made available for self-build including cooperatives? Is there any way land could be made available for co-housing groups?

Are any other places within Spott, and Oldhamstocks where housing could be sympathetically built e.g. as infill? We think there might be.

How can we influence future building to be of a really high quality, with a low carbon impact e.g.. Passivhaus standard?

How can we ensure that new housing meets local people's needs and preserves and encourages the diversity of the villages? Related to this question, can someone tell us what the Council understands about housing need in East Lammermuir? Can we discuss this with a council representative please?

Could there be any way of asking developers to offer construction apprenticeships?

Is there any housing/or a means of offering support with renovations - for people who become elderly and infirm?

Looking more broadly, the Community Council wishes to raise these related points/queries.

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With respect to rail; there is discussion of a new track, platform and bridge at Dunbar station.

Why have contributions by developers to transport not been included as well as to education?

If (contrary to our recommendations) the proposed housing in Innerwick and Spott are to proceed, could there be a proposed contribution figure towards primary education to be included in the LDP for each of these developments?

We note that the Local Development Plan is virtually silent on Health Centres and hospitals, despite the duty on the Council and NHS Board from April 2015 to produce a Strategic Plan for all health and care in East Lothian through an Integration Joint Board. Is it really still acceptable to omit these matters from the Local Development Plan?

Finally, we feel that more emphasis should be given to **supporting infrastructure for employers and businesses in rural settings**. This may be as simple as high speed broadband for people working at home, through to an emphasis on providing for flexible office and workshop space in community facilities in the villages and surrounding countryside. Only by shifting more employment nearer to the villages can we reduce our reliance on transport and therefore reduce our energy consumption and increase sustainability of these relatively fragile communities.

East Lammermuir Community Council

30th October 2016

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-06 21:35:32**

About You

1 What is your name?

First name:

Sam

Surname:

Mutters

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

[REDACTED]

[REDACTED]

[REDACTED]

4 Please enter your postcode

Postcode:

[REDACTED]

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

Local resident/member of the public

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

Organisation:

n/a

Your role:

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

Additional Comments

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:

East Saltoun - Development of Dryden Field

My Husband and I wish for the site / development in East Saltoun to be reconsidered for the following reasons:

- 1) The plan to have 75 new houses would almost double the village. It would overwhelm the village. This size of development is not appropriate and would totally change the character of this rural conservation area. This is also not in accordance with the National Policy guidance, which states that there is a general presumption against new housing in the countryside.
- 2) It will not maintain and enhance the character and appearance of East Saltoun in fact it will change it dramatically.
- 3) As the village currently has a very very limited bus service and only to Haddington, and no other transport links, people will have cars which will increase the traffic issues and the air quality will decrease.
- 4) The infrastructure is limited i.e. there is no shop, no pub and no other facilities for people to use.
- 5) The land is prime agricultural land and developing this, would not only reduce the land but, on a more personal note, would affect our views of the hills and surrounding area. Instead we will have a housing estate staring down on us. We note that on page 36, section 2.106 of the (LDP) plan talks about longer distance views but there is no consideration for current house owners, such as us and others who enjoy this quiet village and views.
- 5) We are concerned about other impacts from this large development, such as noise, air quality (from more cars and fires / fuel being burned) and more

pedestrian traffic going to / from the school as they use Burnet Crescent as a cut through and play ground.

6) There are no employment opportunities within the village and so people will need to travel further afield.

7) The main issues report highlighted that the site was not viable / suitable. The issues have not changed and hence the site is still not suitable.

8) There has been a suggestion to plant trees on the eastern side of the village. This would not help to compensate for the development. There was talk about the trees being planted so that the development is not seen from the Lammerlaw. Consideration for the existing villagers would be more considerate.

9) We have concerns that there may not be enough sewage capacity for the local works and that this needs to be considered and confirmed by Scottish Water, especially as the number of houses has gone up from 50 to 75, since the main issues report was produced.

10) We don't consider that holiday properties that are proposed for the site are to be within the local development plan.

11) Perhaps a better solution would be to build a new village within East Lothian, which is away from East Saltoun, as apart from having pupils visit the school there are no other advantages of the houses being in East Saltoun i.e. no transport, no employment, no shop, limited bus service.

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

Justification for Modification(s):

See above - 1a.

File upload:

No file was uploaded

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-06 23:12:20**

About You

1 What is your name?

First name:

Clare

Surname:

Cavers

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

[REDACTED]

[REDACTED]

[REDACTED]

4 Please enter your postcode

Postcode:

[REDACTED]

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

Local resident/member of the public

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

Organisation:

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::

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

Justification for Modification(s):

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

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

Modifications(s) sought:

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

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s) :

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

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

Justification for Modification(s):

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

Modifications(s) Sought:

Saltcoats, Gullane (NK7) should be removed altogether.

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):

Gullane already has a brownfield site in the form of the Former Fire Training School (NK6) which will offer approximately 100 new homes. Any further development as proposed in paragraph 2.166 is not sustainable in view of Gullane's poor access to employment and services.

Present and proposed infrastructure especially public transport is woefully inadequate compared to what would be needed for the scale of development proposed which includes Saltcoats. The bus service is poor, and access to the train is via North Berwick, Drem or Longniddry, all of which have limited parking facilities which is oversubscribed. I and another female commuter have on separate occasions received threatening behaviour from male commuters in the carpark of Drem station as a direct result of the limited parking and related stress imposed on commuters. As a result neither of us use the station any longer, as the lack of a safe off-road cycle route to Drem necessitates the use of a car to access it. This involves further travelling by car to either North Berwick or Longniddry, necessitated by poor bus services which do not connect with the train services and which are prohibitively expensive. There have been several accidents on the roads surrounding Gullane, which are very rural, narrow and winding, and the inevitable increases in commuter traffic that will come with development on the scale of Saltcoats will only make an increase in accidents more likely.

Within Gullane itself, the development is at the opposite end of the village to most amenities and away from the main road, making the use of cars to access the shops, services and the beach highly likely and increasing village traffic with resultant increases in pollution from cars, risk of accident to other road users and pedestrians, wear and tear on roads, pressure on (already limited) parking in the middle of the village and at the beach.

Community facilities themselves such as the village hall and community groups (i.e. guides, scouts, brownies, cubs, rainbows, beavers) are already at full capacity. The school and medical facilities are also. There is no ability to effectively absorb the increase in population that would accompany the proposed development at Saltcoats. In particular local childcare in the form of childminders and after-school club are pretty much at capacity with little or no room for expansion.

The Saltcoats field at present is used extensively by children playing, dog walkers, families and for the World Ploughing Championships. It is also used extensively by the migratory geese and swans visiting in the winter. Loss of this as a recreational rural site would have a significant impact both environmentally and socially.

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:

Fentoun Gait East, Gullane, (NK8) should be removed altogether from the plan.

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):

Gullane already has a brownfield site in the form of the Former Fire Training School (NK6) which will offer approximately 100 new homes. Any further development as proposed in paragraph 2.167 is not sustainable in view of Gullane's poor access to employment and services.

Present and proposed infrastructure especially public transport is woefully inadequate compared to what would be needed for the scale of development proposed which includes Fentoun Gait East. The bus service is poor, and access to the train is via North Berwick, Drem or Longniddry, all of which have limited parking facilities which is oversubscribed. I and another female commuter have on separate occasions received threatening behaviour from male commuters in the carpark of Drem station as a direct result of the limited parking and related stress imposed on commuters. As a result neither of us use the station any longer, as the lack of a safe off-road cycle route to Drem necessitates the use of a car to access it. This involves further travelling by car to either North Berwick or Longniddry, necessitated by poor bus services which do not connect with the train services and which are prohibitively expensive. There have been several accidents on the roads surrounding Gullane, which are very rural, narrow and winding, and the inevitable increases in commuter traffic that will come with development on the scale of Fentoun Gait East will only make an increase in accidents more likely.

Within Gullane itself, the development is at the opposite end of the village to most amenities and away from the main road, making the use of cars to access the shops, services and the beach highly likely and increasing village traffic with resultant increases in pollution from cars, risk of accident to other road users and pedestrians, wear and tear on roads, pressure on (already limited) parking in the middle of the village and at the beach.

Community facilities themselves such as the village hall and community groups (i.e. guides, scouts, brownies, cubs, rainbows, beavers) are already at full capacity. The school and medical facilities are also. There is no ability to effectively absorb the increase in population that would accompany the proposed development at Saltcoats. In particular local childcare in the form of childminders and after-school club are pretty much at capacity with little or no room for expansion.

The Fentoun Gait East field at present is used extensively by dog walkers and families. It is also used extensively by the migratory geese and swans visiting in the winter. Loss of this as a recreational rural site would have a significant impact both environmentally and socially.

9a PROP NK9: Fentoun 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:

Fentoun Gait South, Gullane (NK9) should be removed from the proposed Plan altogether.

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) :

Gullane already has a brownfield site in the form of the Former Fire Training School (NK6) which will offer approximately 100 new homes. Any further development as proposed in paragraph 2.168 is not sustainable in view of Gullane's poor access to employment and services.

Present and proposed infrastructure especially public transport is woefully inadequate compared to what would be needed for the scale of development proposed which includes Fentoun Gait South. The bus service is poor, and access to the train is via North Berwick, Drem or Longniddry, all of which have limited parking facilities which is oversubscribed. I and another female commuter have on separate occasions received threatening behaviour from male commuters in the carpark of Drem station as a direct result of the limited parking and related stress imposed on commuters. As a result neither of us use the station any longer, as the lack of a safe off-road cycle route to Drem necessitates the use of a car to access it. This involves further travelling by car to either North Berwick or Longniddry, necessitated by poor bus services which do not connect with the train services and which are prohibitively expensive. There have been several accidents on the roads surrounding Gullane, which are very rural, narrow and winding, and the inevitable increases in commuter traffic that will come with development on the scale of Fentoun Gait South will only make an increase in accidents more likely.

Within Gullane itself, the development is at the opposite end of the village to most amenities and away from the main road, making the use of cars to access the shops, services and the beach highly likely and increasing village traffic with resultant increases in pollution from cars, risk of accident to other road users and pedestrians, wear and tear on roads, pressure on (already limited) parking in the middle of the village and at the beach.

Community facilities themselves such as the village hall and community groups (i.e. guides, scouts, brownies, cubs, rainbows, beavers) are already at full capacity. The school and medical facilities are also. There is no ability to effectively absorb the increase in population that would accompany the proposed development at Saltcoats. In particular local childcare in the form of childminders and after-school club are pretty much at capacity with little or no room for expansion.

The Fentoun Gait South field at present is used extensively by dog walkers and families. It is also used extensively by the migratory geese and swans visiting in the winter. Loss of this as a recreational rural site would have a significant impact both environmentally and socially.

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) :

Submitted to **East Lothian Proposed Local Development Plan**
Submitted on **2016-11-06 22:04:58**

About You

1 What is your name?

First name:

Yvonne

Surname:

Addison

2 What is your email address?

Email address:

[REDACTED]

3 Postal Address

Address:

[REDACTED]

[REDACTED]

[REDACTED]

4 Please enter your postcode

Postcode:

[REDACTED]

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

Local resident/member of the public

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

Organisation:

n/a

Your role:

7 Are you supporting the plan?

No

If Yes: Please include your reasons for support:

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

1a What modifications do you wish to see made to the Strategy map for the Prestonpans/Cockenzie/Port Seton/Longniddry Cluster?

Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question. Do you have any comments to make on the

Modifications(s) Sought :

Reference EGT1 should be applied to the former Power Station Energy footprint only - not to the surrounding land, which should retain its designation as Public Open Space and Countryside.

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

Justification for Modification(s) :

The area shown on the map accompanying the Local Development Plan (inset Map 32) extends well beyond the site of the former energy footprint of Cockenzie Power Station. The majority of this land is currently designated, in the East Lothian Local Plan 2008, as Countryside (DC1) or Public Open Space (C3). The land associated with power generation extends to the areas of land covered by the main power station building, transformer building, coal plant and the coal conveyor buildings. This is the site allocated in the adopted 2008 local plan as NRG1.

The proposed changes are not a requirement of National Planning Framework 3 and appear to be seeking to extend the boundaries of the former Power Station site.

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

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

Modifications(s) Sought:

2.49 ELC should modify the LDP to accommodate the dispersed spatial strategy - rather than the compact strategy.

2.51 Port-related developments should be removed from potential developments.

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

Justification for Modification(s):

2.49 The Preferred Approach of compact spatial strategy - concentrating development in the west of the county risks removing much of the public and amenity land for the existing communities.

2.51 Energy related uses, manufacturing, servicing and potentially port related developments are not compatible with the dense residential strategy being proposed under the Plan or with the existing rural residential nature of the area.

I would ask that ELC uphold their views at paragraphs 2.55 & 2.56 with regard to Strategic Landscape Mitigation where they state '2.55 There are areas of land outwith the green belt that are also under development pressure. These are between Prestonpans, Cockenzie, the allocated land at Blindwells and Tranent. Development in these locations would lead to the coalescence of settlements, undermine their character and setting, compromise cultural heritage assets, including battlefields, and / or lead to the loss of the best prime quality agricultural land. The combination of these environmental constraints points to a need to restrain further built development here which, individually or cumulatively, would undermine related objectives. A Countryside Around Town Designation applies to land between these neighbouring settlements. Around Town Designation, to ensure Prestonpans, Cockenzie, Tranent, Blindwells and Longniddry retain their separate identities. This will provide active travel opportunities to link communities, growth areas and places beyond them together. Opportunities for recreation and habitat creation and connection will be delivered as part of the multifunctional Green Network. 2.56 Strategic Green Network opportunities will be delivered, including within the Countryside.'

Additionally paragraph 2.57 states that 'The site of the Battle of Prestonpans is designated, as identified by the National Inventory.' Please may this remain so - and it is not designated for industrial use.

Submitted to **East Lothian Proposed Local Development Plan - Draft Development Briefs**
Submitted on **2016-10-15 09:45:16**

Introduction

What is your name?

Enter your name.:
Rob Moore

What are your contact details?

Email:
[REDACTED]

Postal address:
[REDACTED]

If you submitted a representation on the Proposed Local Development Plan, please enter the reference number. You will find this on the email acknowledging receipt of your representation.

Local Plan Development reference:

Are you submitting comments as/on behalf of:

Local resident/member of the public

Draft Development Briefs

Do you have any general comments on the draft Development Briefs as a whole, or in relation to all briefs in any particular area? Do not include comments on specific briefs here. You will be asked for specific comments on particular draft Development Briefs in the next question.

General comments on draft Development Briefs :

I feel the overall plans are too focused on the west of east Lothian to much which will have a detrimental effect on infrastructure and quality of life.

Please choose the first Development Brief on which you wish to comment. You will be given the opportunity to select further briefs for comment later in the survey.

TT11 Elphinstone West

TT11 Elphinstone West

What modifications do you wish to see made to the Development Brief TT11 Elphinstone West?

Modifications sought to TT11 Elphinstone West?:

I attended the public consultation on 28th Sept in Elphinstone Community Centre, the architects EMA James Fraser said they were keen to hear from and engage with the local community, Two days later I sent them a list of questions to help me decide on / comment on in more detail and they have refused to answer my questions. Directing me to ELC.

So, here are the questions / comments:

Questions for the Architects / Developers – 1st October 2016

Q. What successful examples can you demonstrate where villages have doubled in size with no guarantee / immediate investment in local infrastructure?

Q. What finance and resource are you giving to the local community under your 'Section 75' responsibilities?

The council own 'main issues report' states:-

"The topography leads it to being a very open / un-sheltered location and its visual impact from all sides will be detrimental and an eyesore on the skyline for miles around"

Q. Your housing example at the exhibition didn't demonstrate low rise housing in keeping with the surrounding area or address the statement above, please explain?

"The site only aligns moderately well to the SDA / SES plan, many other sites align far better" "The sites development would not make efficient use of land" "It is greenfield site of prime agricultural land

Q. So, why build here?

"The site is within the CMD (mining) high risk area"

Q. What impact will construction have on the listed and old building opposite the site entrance?

Q. What will you do to mitigate this?

Q. Will you consider a smaller development of affordable homes (Macfarlane Court example) along with investment in local infrastructure to support future sustainable development?

Q. What route restriction through the village for construction traffic will there be over the possible 5 years of building?

Q. What provision will you put in to minimise the construction impact on road safety, air quality and road quality?

Q. What impact will development have on utilities provision? (Elphinstone currently has above average power and water cuts and the 'Main Issues Report' states

"The site would not lend itself well to resource efficiency i.e solar")

Q. How will broadband services be affected? (Elphinstone is currently at the boundary of effective service from the Tranent exchange)

Q. What increase in public transport is planned to support the development?

Q. What healthcare resource or access to it is planned?

Q. What budgets/plans are available to expand the school?

Q. What budgets/plans are available to make the community centre more accessible?

Q. What consideration / plans are in place to avoid disturbance of protected species that live in the development area (EG Badgers, Bats, Buzzards, Hedgehogs) ?

Q. What play / leisure spaces are built in to the development plan?

Q. What native species of plants will be used / will allotments be considered?

Q. What allocation of affordable homes will be made for current Elphinstone tenants/residents who live in under/over populated houses?

Q. What guarantee of jobs / apprenticeships for local people will there be during the construction?

Q. Why do your plans show the destruction of mature woodland between the development and Waterloo Place?

Q. In the same area a footpath is shown to connect the development to Waterloo Place – this is mapped over privately owned land, please explain?

Q. On your exhibition plan it has a 'potential gateway feature' – what is that?

I have also attached their refusal to answer

upload map relative to TT11:

EMA Conversation 4th October.pdf was uploaded

Please give reasons for your suggested change.

Reasons for changes TT11 Elphinstone West:

Please see my questions / comments in the above

Do you wish to comment on any further Development Briefs? If so, choose one below. You will be given the opportunity to select further briefs later in the survey.

I do not wish to comment on any further Development Briefs

Rob Moore [REDACTED]

12:40 (6 minutes ago)

Reply

to james.f

Thanks James

Appreciate your comments as well and my questions are purely personal rather than on behalf of any group.

I disagree though as you are directly refusing to answer the questions that you encouraged people to ask.

Although I sense now that no matter how I put it them to you you wont be answering any of them as you have said *"we have gone beyond our statutory requirements related to community engagement"*

I find this a strange position to take considering the open conversation we have had over the last months.

I'm happy to chat further.

Kind regards

Rob
Rob Moore FIH MIO
Managing Director

[REDACTED]
[REDACTED]
[REDACTED]

On 4 October 2016 at 12:18, [REDACTED] > wrote:
Rob

Thank you for your email. We are certainly not refusing to answer questions and we have gone beyond our statutory requirements related to community engagement. We have spent a lot of time engaging with the community and are now in the process of collating all the comments received to inform the final design.

Rob, The purpose of the feedback form made available at the event was for the local community to highlight their views and this was the form we encouraged everyone to complete. We have obviously met with you and your colleagues on a number of occasion and you have made your points clear. We will consider all comments made by the public as we progress towards a planning application.

As highlighted in the previous email, comments / questions should be made direct to the council once the application is lodged.

Regards

James Fraser
Associate Director
for EMA Architecture + Design Limited
EMA Architecture + Design Limited
42 Charlotte Square, Edinburgh, EH2 4HQ.
w: <http://www.ema-architects.co.uk>
e: [REDACTED]

[REDACTED]
[REDACTED]

From: Rob Moore [mailto: [REDACTED]]
Sent: 04 October 2016 11:30
To: [REDACTED]
Subject: Re: Development Questions

Hi James

Thanks for the reply, can you just confirm that you are refusing to answer any of my questions that relate to your plans?

I thought the idea of a Public Consultation / Exhibition was for the local community engage with you to ask questions? and we were encouraged by you last week to submit these?

Kind regards

Rob

Rob Moore FIH MIO
Managing Director

On 4 October 2016 at 11:20, [REDACTED] > wrote:

Thank you for attending the Elphinstone public event on Wednesday 28th of September 2016, at the Elphinstone Community Centre and for your subsequent email.

At present we are working through all the comments received at the event and this will inform the design towards a submission. We do not intend to provide a response to each individual and your comments / questions should be made direct to the council once the application is lodged.

Regards

James Fraser
Associate Director
for EMA Architecture + Design Limited
EMA Architecture + Design Limited
42 Charlotte Square, Edinburgh, EH2 4HQ.
w: <http://www.ema-architects.co.uk>
e: [REDACTED]

From: Rob Moore [mailto: [REDACTED]]
Sent: 01 October 2016 10:23
To: [REDACTED]
Subject: Development Questions

Hi James

Thanks for the chat on Weds, I didn't have a chance to ask all my questions though.

So hopefully you can get back to me with a bit more detail on the attached

Many thanks

Rob

Rob Moore FIH MIO

Submitted to **East Lothian Local Development Plan - Action Programme**
Submitted on **2016-11-05 19:09:40**

Introduction

What is your name?

Name:
Francis Ogilvy

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

Landowner

If you submitted a representation on the Proposed Local Development Plan, please enter the reference number. You will find this on the email acknowledging receipt of your representation.

Proposed Local Development Plan Representation reference:

What are your contact details?

Email:
[REDACTED]

Postal address:
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Action Programme Introduction (Pages 2 - 6 only)

What modifications do you wish to see made to the Introduction to the Action Programme?

Modifications to Introduction sought:

Please give any information/reasons in support of each of your suggested modifications. State all relevant page numbers of the Action Programme.

Reasons for changes, Introduction:

Priority 1 - Adoption of Local Development Plan Supplementary Guidance and Supplementary Planning Guidance

What modifications do you wish to see made to the "Priority Action 1 - Adoption of Local Development Plan Statutory and Non-Statutory Guidance" section of the Action Programme?

Changes sought to Priority 1 - Statutory and Non-Statutory guidance :

Please give any information/reasons in support of each of your suggested changes. State all relevant Guidance and policy references.

Priority One, explanation of reasons for changes :

Priority 2 Major Infrastructure

What modifications do you wish to see made to the "Priority 2 - Delivery of Specific Proposals relating to Major Infrastructure" section of the Action Programme?

Changes sought to Priority 2 - Major Infrastructure :

Please give any information/reasons in support of each of your suggested changes. State all relevant Proposed Local Development Plan Policy or Proposal references.

Priority 2 - explanation of reasons for changes:

Priority 3 Education Proposals

What modifications do you wish to see made to the "Priority Action 3 - Education Proposals" section of the Action Programme?

Changes sought to Priority 3 - Education Proposals:

Please give any information/reasons in support of each of your suggested changes.

reasons in support of changes to Priority 3:

Guidance Action 1 Adoption of Local Development Plan Supplementary Planning Guidance

What modifications do you wish to see made to the "LDP Guidance - 1 (Adoption of Local Development Plan Supplementary Planning Guidance" section of the Action Programme?

Changes to Guidance Action 1:

Please give any information/reasons in support of each of your suggested modifications. State all relevant Supplementary Guidance and policy references.

Reason for changes, Guidance Action 1:

Guidance Action 2 Growing our Economy and Communities

What modifications do you wish to see made to the "Growing our Economy and Communities" section of Guidance Action 2 of the Action Programme?

Changes sought to Growing our Economy and Communities:

Reference to the countryside and the part it can play for the wellbeing and economic development of the county is welcomed, though greater emphasis on the contribution appropriate development can play is to be encouraged. In particular the following points are offered:

DC1-3 & 5 There remains a presumption against new-build in most circumstances. Is this necessary when there is also a desire to see variety of good architectural design.

SEH1 Emphasis on community heat schemes is welcomed. Can this be strengthened and applied to many existing public buildings also which are likely to be the largest users of heat with lesser standards of insulation?

MIN5 There are no signs that representation to the LDP MIR have been taken into account. In particular the identification that there is a legal requirement for a landbank of resources for sand and gravel extraction which the current allocation falls far short of. The proposed LDP draft action programme completely fails to address the issues raised in respect of both landbank or facilitating the potential to bring forward reasonable proposals for minerals development.

There is a very small exception in Policy MIN5 as the statement of a presumption against minerals development finishes with the words "with some exceptions granted" although there is no expansion on what might constitute a reasonable exception.

Policy MIN5 should be deleted or at least reworded to make provision for minerals development where environmental assessment demonstrates that this can be undertaken within acceptable parameters.

Policies DC8 & 9 introducing yet more protective designations - Countryside around Towns (CAT) and Special Landscape Areas (SLA) would appear unnecessary given the protection already available.

WD2 Small Wind Turbines - the restriction on small scale turbines to below 12m in height would seem to ignore intelligence from within the industry and the need to work towards a low carbon economy.

Please give any information/reasons in support of each of your suggested changes to the Growing our Economy and Communities section. State all relevant Proposed Local Development Plan Policy or Proposal references.

Reasons for changes, growing our economy and communities:

DC1-3 + 5 When housing is expected to be only in large groups, most likely now constructed by national house builders, individuality will be stifled and the benefit of local contractors will not be won. There is also an opportunity for self-build which offers further opportunities for affordable housing to come naturally rather than under an designation.

The housing policy still places emphasis on larger blocks and this is after many years of holding back on release of land. We now have a wave of large consents coming forward. Can there be a presumption to look to releasing small groups of land on a regular basis? This would have the advantage of allowing developments to use local developers and for rural communities to integrate developments in a more organic fashion, as well as benefit rural schools and services.

MIN5 & 10

Almost two years have elapsed since representation was made relative the limited land bank for sand and gravel compared with the legal requirement. Since then there have been no new applications/permissions for sand and gravel extraction within that period so the issue in respect of landbank is even more critical and relevant.

In many cases, the possibility for enhancement of the countryside, in addition to employment created as a consequence of mineral extraction linked with the

quality of after-use could be argued strongly in favour of development and the future benefits that would be enabled. The location of sand and gravel reserves at Pencaitland in this respect to leave behind a water recourse for tourism and wildlife is a particular opportunity which this blanket policy would seem to ignore. The minerals policy MIN5 would appear also to ignore the potentially significant benefits to flood prevention downstream where areas can be left under water and an expanded permanent flood area rather than water routes channelled in the manner they have become through changes in agriculture.

WD2 Small Scale Wind Turbines - Industry favourites for maximum economic contribution point to turbines of at least 100kw. If we are serious about contributing in this manner to reducing reliance on fossil fuels, we should make it easier to encourage farm-scale developments as there used to be in the East Lothian countryside with single turbines at many steadings where wind speeds will relate to an economic proposition. These turbines are generally >22m high. Some can be seen around the county, but generally there is room for many more.

Guidance Action 2 - Infrastructure and Resources

What modifications do you wish to see made to the "Infrastructure and Resources" section of Guidance Action 2?

Infrastructure and resources changes wished:

Please give any information/reasons in support of each of your suggested changes to the Infrastructure and Resources section. State all relevant Proposed Local Development Plan Policy or Proposal references.

Infrastructure and resources reasons :

Guidance Action 2 - Diverse Countryside and Coastal Areas

What modifications do you wish to see made to the "Diverse Countryside and Coastal Areas" section of Guidance Action 2

Diverse Countryside and Coastal Areas changes sought:

Please give any information/reasons in support of each of your suggested changes to the Diverse Coast and Countryside section. State all relevant Proposed Local Development Plan Policy or Proposal references.

Reasons for the changes to Diverse Countryside and Coastal Areas:

Guidance Action 2 - Our Natural and Cultural Heritage

What modifications do you wish to see made to the "Our Natural and Cultural Heritage" section of Guidance Action 2 of the Action Programme?

Changes to our Give changes to Natural and Cultural heritage section of Guidance Action 2:

Please give any information/reasons in support of each of your suggested changes to the Our Natural and Cultural Heritage section. State all relevant Proposed Local Development Plan Policy or Proposal references.

Give reasons and information in support of suggested change to Our Natural and Cultural heritage section of Guidance Action 2 of the Action Programme:

Guidance Action 2 - Design

What modifications do you wish to see made to the "Design" section of Guidance Action 2 of the Action Programme?

Give changes to Design section of Guidance Action 2 of the Action Programme:

Please give any information/reasons in support of each of your suggested changes to the Design section. State all relevant Proposed Local Development Plan Policy or Proposal references.

Reasons for changes to Design section :

Guidance Action 2 - Delivery

What modifications do you wish to see made to the "Delivery" section of Guidance Action 2 of the Action Programme?

Give changes to Delivery section of Guidance Action 2 of the Action programme:

Please give any information/reasons in support of each of your suggested changes to the Delivery section. State all relevant Proposed Local Development Plan Policy or Proposal references.

Reason for change to the Delivery section of Guidance Action 2 of the Action Programme:

Monitoring and Assessment for LDP Review

What modifications do you wish to see made to the "Monitoring and Assessment for LDP Review" section of the Action Programme?

Give changes to Monitoring and Assessment for LDP review section :

Please give any information/reasons in support of each suggested modification.

reasons for changes to monitoring and review:

Do you wish to suggest a modification in respect of any specific cluster area? If so, please select one area. You will be given the opportunity to comment on further areas later in the survey

Tranent Cluster

Tranent Cluster

What modifications do you wish to see made to the Tranent Cluster section of the Action Programme?

Tranent Cluster changes:

There is a reference to a burial ground at Pencaitland. No intimation of this has been given to the landowner.

Please give any information/reasons in support of each of your suggested changes to Tranent Cluster section of the Action Programme. State all relevant site names and proposal references.

Tranent Cluster reasons:

Do you wish to comment on any further specific Cluster Areas? Please select one. You will be given the opportunity to select further areas later in the survey if you wish to comment on more than one.

Not Answered

Blindwells Cluster

What modifications do you wish to see made to the Blindwells Cluster section of the Action Programme?

Blindwells cluster changes:

Please give any information/reasons in support of each of your suggested changes to Blindwells section of the Action Programme. State all relevant site names and proposal references.

Blindwells reasons :

Do you wish to comment on any further specific Cluster Areas? Please select one. You will be given the opportunity to select further areas later in the survey if you wish to comment on more than one.

Not Answered

Haddington Cluster

What modifications do you wish to see made to the Haddington Cluster section of the Action Programme?

Haddington Cluster changes:

Please give any information/reasons in support of each of your suggested changes to Haddington Cluster section of the Action Programme. State all relevant site names and proposal references. .

Haddington Cluster reasons:

Do you wish to comment on any further specific Cluster Areas? Please select one. You will be given the opportunity to select further areas later in the survey if you wish to comment on more than one.

Not Answered

Dunbar Cluster

What modifications do you wish to see made to the Dunbar Cluster section of the Action Programme?

Dunbar Cluster:

Please give any information/reasons in support of each of your suggested changes to Dunbar Cluster section of the Action Programme. State all relevant site names and proposal references.

Dunbar Cluster changes:

Do you wish to comment on any further specific Cluster Areas? Please select one. You will be given the opportunity to select further areas later in the survey if you wish to comment on more than one.

Not Answered

North Berwick Cluster

What changes do you wish to see made to the North Berwick Cluster section of the Action Programme?

North Berwick Cluster changes:

Please give any information/reasons in support of each of your suggested changes to North Berwick Cluster section of the Action Programme. State all relevant site names and proposal references.

North Berwick Cluster Reasons for changes:

Do you wish to comment on any further specific Cluster Areas? Please select one. You will be given the opportunity to select further areas later in the survey if you wish to comment on more than one.

Not Answered

Any other comments?

Do you have any further comments on the Action Programme?

Any other comments:

Upload file with further comments :

No file was uploaded

6 October 2016

Our reference FGAO/W001/M008)

Iain McFarlane
East Lothian Council
John Muir House
Haddington
East Lothian

Dear Iain,

**Response to the East Lothian Local Development Action Programme
On behalf of Winton Estate, Pencaitland**

I have submitted a response at the consultation hub for the LDP Action Programme, however it concerns me that I may not have followed everything in the correct order so this is offered as essentially a cut-and-pasted version simply as a letter along with the two attachments of submissions made originally to the MIR which still stand. I consulted with Nick Wright and Richard Heggie who assisted me before and also with Willie Booth of Dalgleish Associates for the minerals representation.

General

Reference to the countryside and the part it can play for the wellbeing and economic development of the county is welcomed, though greater emphasis on the contribution appropriate rural development can play is to be encouraged. In particular the following points are offered:

Housing - DC1-3 & 5

There remains a presumption against new-build in most circumstances. Is this necessary when there is also a desire to see variety of good architectural design? When housing is expected to be only in large groups, most likely now constructed by national house builders, individuality will be stifled and the benefit of using local contractors will not be won.

There appears very little at all to promote self-build development and the individuality that this could bring. Self-build also offers opportunities for affordable housing to come naturally rather than under a designation.

The promotion now of larger blocks comes after many years of holding back on release of land. Can there be a presumption to look to releasing small groups of land on a regular basis? This would have the advantage of allowing developments to use local developers and for rural communities to integrate developments in a more organic fashion, as well as benefit rural schools and services.

Minerals (MIN5) – sand and gravel

There are no signs that representation to the LDP MIR have been taken into account. In particular the identification that there is a legal requirement for a landbank of resources for sand and gravel extraction which the current allocation falls far short of. The proposed LDP draft action programme

completely fails to address the issues raised in respect of both landbank or facilitating the potential to bring forward reasonable proposals for minerals development.

There is a very small exception in Policy MIN5 as the statement of a presumption against minerals development finishes with the words “with some exceptions granted” although there is no expansion on what might constitute a reasonable exception. The suggestion is for policy MIN5 to be deleted or at least reworded to make provision for minerals development where environmental assessment demonstrates that this can be undertaken within acceptable parameters.

Almost two years have elapsed since representation was made relative the limited land bank for sand and gravel. There have been no new applications/permissions for sand and gravel extraction within that period so the issue in respect of landbank is even more critical and relevant.

In many cases, the possibility for enhancement of the countryside, in addition to employment created as a consequence of mineral extraction linked with the quality of after-use could be argued strongly in favour of development and the future benefits that would be enabled. The location of sand and gravel reserves at Pencaitland in this respect to leave behind a water recourse for tourism and wildlife is a particular opportunity which this blanket policy would seem to ignore.

The minerals policy MIN5 would appear also to ignore the potentially significant benefits to **flood prevention** downstream where areas can be left under water and an expanded permanent flood area rather than water routes channelled in the manner they have become through changes in agriculture.

Policies DC8 & 9

Countryside around Towns (CAT) is (I think) a new designation. Whilst the intention is clear, the requirement of yet another protective designations (along with Special Landscape Areas (SLA) and others) would appear unnecessary given the protection already available.

Renewable Energy

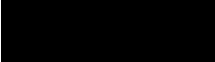
SEH1 Emphasis on **community heat** schemes is welcomed. Can this be strengthened and applied to many existing public buildings also which are likely to be the largest users of heat with lesser standards of insulation?

WD2 Small Wind Turbines - the restriction on small scale turbines to below 12m in height would seem to ignore intelligence from within the industry and the need to work towards a low carbon economy. Research for maximum economic contribution point to turbines of at least 100kw. If we are serious about contributing to reducing reliance on fossil fuels, we should make it easier to encourage farm-scale developments as there used to be in the East Lothian countryside with single turbines at many steadings where wind speeds will relate to an economic proposition. These 100kw turbines are generally >22m high. Some can be seen around the county, but generally there is room for many more.

Tranent Cluster – Pencaitland

I note there is a suggestion of extending the public cemetery to across the road behind the war memorial. This is the first I have heard of the idea which I find odd since I am responsible for the land there. I would not, at this juncture at least, favour the proposal.

Yours sincerely



Francis G A Ogilvy
Direct Dial: [Redacted]
E-mail: [Redacted]

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

Submitted by email to: ldp@eastlothian.gov.uk

6 February 2015

Dear Sir/Madam,

Main Issues Report consultation response for Winton Estate, Pencaitland

Following on from our pre-Main Issues Report representation submitted on 1 February 2013 (copy enclosed) by my colleague [REDACTED], I am writing on behalf of [REDACTED] to set out the Estate's response to the Main Issues Report.

1 Introduction

In our pre-MIR response, we emphasised that Winton Estate is particularly interested in creating and supporting employment in the countryside. With this in mind the Estate continually reviews its long-term management and development strategy. This is essential in supporting the viability of the Estate as a whole and in particular the historic Category A listed Winton House, which has seen considerable investment in recent years to secure its future. A clear vision for the future is important for the Estate, which provides valuable employment and economic benefit to East Lothian through its high profile tourism/hospitality business and other activities. It is also useful in engaging interested agencies, partners and the local community, providing a context for Estate initiatives and projects.

Since that pre-MIR response was submitted two years ago, the Estate has begun to prepare that future vision. Importantly, this is being done collaboratively with local authority members and officers, other public agencies and residents from the surrounding villages (Pencaitland, Ormiston and New Winton) and the intervening countryside.



The initial stage was a series of seven tours and visits in late 2013 and early 2014 at which the Estate laid out its stall – essentially to initiate a conversation about the need for development and change if the Estate is to have a viable future as both a source of employment and offering responsible stewardship of the countryside, biodiversity and built heritage. These events looked at potential development proposals in a number of locations around the Estate: residential and employment development at New Winton, sand and gravel extraction in the valley of the Tyne, renewable energy production and tourism/social enterprises at Broomrigg and Winton Hill farms. These developments were trailed in our pre-MIR representation.

More recently, in January 2015, the Estate organised two further update events for local communities and public agencies. In the intervening year, the Estate did further research on the initial ideas discussed in late 2013 / early 2014, taking into account the suggestions and comments made at those events. This resulted in some modification of those initial ideas.¹

At those January 2015 events, the Estate presented a draft long-term package of development ideas for the period covering the next Local Development Plan (LDP) and beyond. Again, this package of proposals was not presented as a *fait accompli* but as part of the ongoing conversation. Although the package needs further work on costing, viability and programming – and will continue to evolve – before it can be considered a fully-fledged masterplan, we submit it as part of this representation to illustrate the Estate's long-term aspirations (see enclosed plan extract from public leaflet).

We have explained this background for two reasons. Firstly, to demonstrate the Estate's commitment to **appropriate rural development** and to working collaboratively and responsively to determine what that should be. Secondly, because we believe that this process could be a **model for managing long term rural change** in other parts of East Lothian. There are real lessons for using this collaborative model as the methodology for determining the long-term vision and finer grained detail of LDP policy at village or estate level, particularly if it is linked with Community Planning so that it properly integrates spatial planning, economic growth and community development.

¹ For example, the idea of residential and employment development at New Winton put forward in late 2013 / early 2014 has been shelved. The Estate knows from its community engagement in early 2014 that there is some demand locally for a small amount of new housing, and believes that every rural community should be encouraged to grow incrementally. We also understand there are concerns within the community about new development.

The Estate is not currently in a position to progress development at New Winton, and has therefore decided not to seek any development land allocation at New Winton in the forthcoming LDP. As explained in our pre-MIR representation, the Estate would engage on a collaborative masterplanning exercise with the residents of New Winton if and when it is ready to consider progressing development there.

(For the avoidance of doubt, site reference PM/TT/HSG092 on page 219 of the MIR Interim Environmental Report Appendix 6 is not a site that the Estate currently supports or intends to develop.)

2 MIR consultation question 10: development in the countryside and on the coast

We will return to Winton in the final section of this representation. Before that, let us take a step back to the rural agenda for East Lothian as a whole, well beyond the limits of Winton Estate.

In our pre-MIR representation, we stated our support for the Rural Voice pre-MIR consultation work undertaken in late 2013 with the Council's support. The report of that pre-MIR consultation, enclosed as part of this representation, clearly stated in its executive summary:

"... no change is not an option. There is a good opportunity for the Council to break new ground with an integrated rural planning policy that releases rural economic potential, enables sustainable communities, and conserves natural resources."

Given this was the conclusion of a Council-sponsored pre-MIR engagement, the Estate is disappointed that the Main Issues Report (pages 72-73) concludes that no change is in fact the most appropriate option for East Lothian's countryside:

"Preferred Approach: Maintain current policy approach to development in the countryside..."

"Reasonable Alternative: ... Generally maintain the current policy approach, but review Policy DC1 to include the following exceptions: [like-for-like replacements of existing dwellings rendered uninhabitable by accidental fire etc, and very small-scale solely-affordable housing as extensions to existing settlements or groups of dwellings]"

Neither the Preferred Approach nor the Reasonable Alternative makes any mention of the wider economic and community agenda emerging from the pre-MIR rural engagement. It was clear at the 'rural' MIR consultation workshop organised by the Council on 26 January 2015 that this disappointment was shared by the majority of rural business, landowner and community stakeholders at that event.

In response to MIR consultation question 10, **the Estate cannot support either the Preferred Approach or the Reasonable Alternative**. Question 10 asks for respondents to suggest alternatives. We would refer you to the alternatives outlined in a discussion paper shared with Council officers in February 2014.² That paper is enclosed as part of this representation.

² Please note that the examples from other planning authorities mentioned in that paper are not exhaustive. Loch Lomond and the Trossachs National Park, for instance, is currently a few months ahead of East Lothian Council in the LDP process and its officers have useful experience to share on their emerging policy response to a similar combination of rural circumstances and aspirations in the rural lowland areas of the Park around the southern edges of Loch Lomond.

3 Winton Estate's aspirations for the next Local Development Plan period

This final section outlines the main aspirations of our emerging long term Estate plan relevant for the forthcoming Local Development Plan.

Tourism, visitor and community proposals

As explained in our pre-MIR representation, the Estate has a number of tourism and visitor related projects under consideration. All are designed to contribute to a vibrant, enterprising and prosperous rural East Lothian as well as to the Estate's long term sustainability – particularly the jobs that the Estate supports, conservation of the countryside and public access around various parts of the Estate, and support for the long term future of the A-listed Winton House which is both jewel-in-the-crown and millstone-round-the-neck for the Estate.

Our emerging proposals are as described on the enclosed leaflet and plan distributed locally in January 2015:

- Broomrigg Farm: refurbishment of the old steading as a venue for rustic weddings and parties, with a new building to accommodate bakery, café, activity centre and/or education space run by private/social enterprise for local residents and visitors.

This would link with restoration of the proposed sand and gravel extraction at adjacent Loanfoot (see 'Minerals' below) to create a small number of discrete self-catering lodges, increased public access and additional wildlife habitats.

- Wintonhill Farm: the Estate proposes, when funds allow, to convert the steading area for a small number of self-catering units.

These aspirations will require planning permission if they proceed. The forthcoming LDP's planning policies for development in the countryside and tourism developments will be applicable, and we would encourage the LDP to support and promote appropriate tourism development as fully as possible.

Renewables

In our pre-MIR representation, we explained that the Estate has a number of renewable energy projects in development or under consideration. Future planning policy will provide a framework against which planning applications will be assessed.

Winton Estate has invested in renewable energy initiatives for some years, and continues to keenly support them. A single, farm-scale wind turbine is due to be erected in February 2015 at Nisbet Farm. The Estate proposes to erect three other similar turbines for discrete installation on three other farms, including one at Broomrigg to link with the other activities proposed there (see above).

We note that the MIR suggests that existing Supplementary Planning Guidance for onshore wind turbines is generally sound, although a new spatial framework for wind energy development will be prepared (incorporating guidance on cumulative issues). We believe

that the existing Supplementary Guidance needs to be revised to reflect the updated national policy position contained in 2014 Scottish Planning Policy (SPP, published after the Supplementary Guidance), and that the Guidance also needs to be revised to take account of other changed circumstances. Our reasoning for this is laid out in the accompanying paper on wind energy, produced by wind consultants and chartered planners Realise Renewables.

Generally, we urge that the policy framework in the Proposed Plan and any accompanying Supplementary Guidance should be generally supportive of wind power generation. Critically, planning policy should allow flexibility, whilst protecting the amenity of residents and communities and sensitive landscapes. Given the levels of constraints outlined in the MIR (pages 185-190), flexibility will be important to avoid stymying the important contribution that small and medium sized wind turbines can make to the Scottish Government's targets for renewable power generation and properly reflect SPP requirements.

We are currently considering potential sites for wind turbines, and it is our intention to contact the Council in the coming months to discuss those.

In response to MIR consultation question 22 (renewable energy), **the Estate cannot support either the Preferred Approach or the Reasonable Alternative as they relate to wind energy.** Our enclosed paper suggest alternatives.

Minerals

As explained in our pre-MIR representation, the current Local Plan policy controlling sand and gravel extraction appears to be restrictive, identifying a single site at Longyester. This is not in the best interests of a competitive and enterprising East Lothian economy. A range of sites providing materials for local projects would support sustainable economic development, minimising transportation requirements.

We are disappointed that only Longyester is put forward in the MIR's Preferred Approach for future sand and gravel extraction, with mention of Skateraw in paragraph 7.43. These locations are already consented and cannot be regarded as future areas of search. The MIR (paragraph 7.43) acknowledges its likely inability to maintain a 10 year land bank of aggregates as required by SESplan Strategic Development Plan, yet fails to put forward a strategy to satisfy the shortfall.

More detailed analysis is contained in the accompanying paper on sand and gravel, which is submitted as part of this representation.

To meet SESplan requirements, additional sites will need to be included as areas of search. We suggest two sites on Winton Estate in the valley of the Tyne upstream and downstream of Pencaitland (at Loanfoot and Spilmersford respectively). A basic scoping assessment has been undertaken of potential environmental and amenity issues, the conclusion of which was that, operations could be undertaken to meet current standards with appropriate design, drainage, traffic routing, management, operations and restoration proposals. The Estate's

plan is that the sites would subsequently be restored as wetland and freshwater lochs, part of the Estate's long term aspirations to create opportunities for public access, visitor accommodation, flood attenuation and additional wildlife habitats.

In response to MIR consultation question 24 (minerals), **the Estate cannot support either the Preferred Approach or the Reasonable Alternative**. Question 24 asks for respondents to suggest alternatives. Our enclosed paper on sand and gravel contains alternative options for sand and gravel, suggested amendments to minerals planning policy and suggestions of specific areas of search for aggregates to be considered for inclusion in the Local Development Plan.

New Winton

As explained in the footnote on page 2, the Estate currently has no intentions to develop at New Winton within the next 5-10 years.

That said, we do believe that small-scale and incremental development is in the community's long term interest. We will wish to progress some appropriate proposals through future LDP reviews, but the local community should rest assured that consultation with them would be the first step in that process. The overall time-frame for any development is long term and will depend on funds being available.

4 Conclusion

We trust that this letter and accompanying documents will be helpful for the Council in preparing the Local Development Plan. Please do not hesitate to contact us if you require any further information.

Yours faithfully,



Nick Wright

For and on behalf of Winton Estate

cc Richard Heggie, Urban Animation
Willie Booth, Dalgleish Associates
John Maslen, Realise Renewables

Enclosures:

- 1 Pre-MIR representation, 1 February 2013
- 2 Estate consultation leaflet and plan, January 2015
- 3 Rural Voice pre-MIR consultation report, January 2013
- 4 Discussion paper containing alternative rural policy alternatives, February 2014
- 5 Paper on renewable energy (MIR question 22) by Realise Renewables, February 2015
- 6 Paper on minerals (MIR question 24) by Dalgleish Associates, February 2015

Ian Glen

Planning & Building Standards
East Lothian Council
John Muir House
Court Street
Haddington
East Lothian
EH41 3HA

1 February 2013

Dear Ian

Pre-MIR Representations : Winton Estate

Following on from the recent Rural Voice engagement study, I am writing on behalf of our clients, Winton Estate, to set out some preliminary views in advance of the Main Issues Report. Although these views are distinct from the Rural Voice report and relate specifically to Winton Estate, the content of that report is endorsed as a useful contribution to the Local Development Plan process. The Estate is particularly interested in creating and supporting employment in the countryside.

Winton Estate continually reviews its long term management and development strategy. This is essential in supporting the viability of the Estate as a whole and in particular the historic Category A listed Winton House. A clear vision for the future is important for the Estate, which provides valuable employment and economic benefit to East Lothian through its high profile tourism/hospitality business and other activities. It is also useful in engaging interested agencies, partners and the local community, providing a context for Estate initiatives and projects.

Planning policy is equally important to the Estate since some of its activities and ambitions relate to development or changes in land use which require planning permission. Accordingly, I would be grateful if you would take the following opportunities and comments into consideration when finalising the Main Issues Report :

1. **Rural Voice** - Winton Estate supports the findings of the recent Rural Voice study. The Estate is committed to promoting rural enterprise and the vitality of East Lothian's rural communities through its own activities and in partnership with others.

The LDP process offers an opportunity to review rural policy and make any appropriate adjustments in response to changing economic, social, and environmental circumstances. Support for rural enterprise and communities should be a priority for the LDP.

2. **Pencaitland** - The LDP process presents an opportunity to consider the current and long term vitality of Pencaitland and its requirements for housing, employment and enterprise, local services and community wellbeing. This might best be achieved through a master planning and community engagement exercise which considers the village as a whole.

Whilst there has been expansion of the village in the recent past, local services have been under pressure. What services and facilities does the village need in order to prosper? Is new housing required to maintain current population levels or attract new residents? What can be done to support local employment and enterprise? The Estate has no site specific proposals at this stage but would encourage and participate fully in devising a long term strategy for Pencaitland.

3. **New Winton** - The New Winton settlement is a planned village, constructed in two distinct phases. The LDP process presents an opportunity to consider the potential for further growth of the village through a master planned approach, protecting and enhancing the distinctive character of New Winton.

No site specific proposals have been prepared for development at Winton. However, the Estate would like to undertake a master planning study, including community engagement, to identify a sustainable long term proposal for the village.

4. **Minerals Policy** - There are significant deposits of coal, fireclay and sand and gravel within the Estate. In the case of coal, there are no plans for extraction at present.

The current Local Plan policy controlling sand and gravel extraction appears to be restrictive, identifying a single site at Longyester. This is not in the best interests of a competitive and enterprising East Lothian economy. Other sites, including Winton Estate, may meet the rigorous environmental and planning considerations which typically apply to extraction and should also be considered favourably where their benefits can be illustrated. A range of sites providing materials for local projects would support sustainable economic development, minimising transportation requirements.

5. **Tourism Developments** - The Estate has a number of tourism and visitor related projects under consideration. Some will require planning permission if they proceed. The Council's policies relating to Development in the Countryside and Tourism Developments will be applicable.

The Estate wishes to reinforce the findings of the Rural Voice study as it relates to these policy areas. Supporting a vibrant, enterprising and prosperous rural area is in the interests of all East Lothian's residents, businesses and communities. The LDP should support and promote appropriate tourism development as fully as possible.

6. **Renewables** - The Estate has a number of renewable energy projects in development or under consideration. The Council's Supplementary Guidance (SG) will provide a framework against which any relevant planning applications will be devised and decided. The SG should allow flexibility where appropriate, whilst protecting important landscape and the amenity of residents and communities.

7. **Design Quality** - The Estate is a strong supporter of good quality rural design and will seek to achieve a high standard in all projects. Where this can best be achieved through a hands on approach, the Estate will play a central role in delivery of development. Any developments at Pencaitland and New Winton would benefit from this approach, ensuring development progresses at an appropriate time and pace, and to an appropriate form and design, with integrated housing, community and employment uses. Accordingly, the Estate supports the Council's commitment to quality design through its planning policies.

Perhaps we could meet soon to discuss these points? Meantime, please let me know if you require any clarification on the contents of this letter.

Kind Regards

Richard Heggie
Director,
Urban Animation

For and on behalf of **Winton Estate**

cc. Nick Wright Planning

Estate Housing at New Winton.

At one time, building houses was commonplace on the estate on farms, in Pencaitland and the early phase of New Winton. In the last century, only four have been built yet there is demand for more. We plan to build gradually at New Winton in small groups, complimenting the surroundings, not detracting from them.

Community consultation would be the next step in this process but the overall time frame for any development is long term and depends on funds being available.



The Estate woodlands

An important part of the landscape, covering 850 acres with half a million trees, two thirds of which are broadleaves.

Our management aims are to produce high quality timber and wood for fuel (firewood and chip) whilst seeking to offer beautiful places to walk and a diverse habitat for wildlife.



Self catering

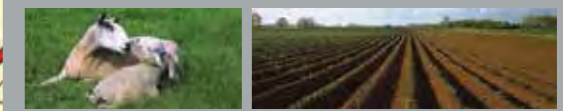
Winton Estate operates two luxury self catering houses; Wintonhill Farmhouse, sleeping 12 - 14 people and the large former laird's house, Winton Cottage, sleeping 10 - 12. The two are amongst the very best self-catering properties in East Lothian.

We propose, when funds allow, to convert the steading area for a small number of self-catering units, though this is not a priority.



Winton farmland

Farming has been the backbone of the estate for centuries. Ambitious proposals for Broomrigg Farm in 2016 would further local employment and extend opportunities for tourism.



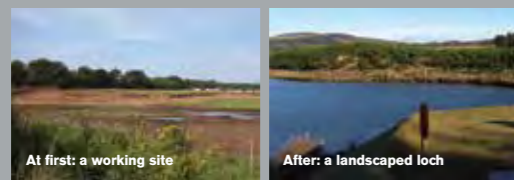
Mineral reserves

There are various opportunities but sand and gravel have the most potential. Extraction proposals cover four fields next to the river between Ormiston and Pencaitland, then a further four fields east of the Spimersford Bridge (all marked in pink on the map). Transportation routes would be carefully planned to avoid disturbance.

The big prizes from this proposal are leaving lochs landscaped for recreation, improving flood prevention by the River Tyne and providing additional habitats for wildlife and improved public access.



The fields: top left



At first: a working site

After: a landscaped loch

Winton House

The jewel in the crown and a millstone round the neck.

Built to entertain and impress, Winton is one of Scotland's most architecturally important houses. It draws in visitors but sucks out money. The annual cost for maintenance is eye-watering and barely offset by tourism usage: these estate plans are in part designed to avoid resorting to the public purse for assistance.

As such, the future of the house is dependent on the success of these proposals.



Renewable energy

Winton Estate keenly supports renewable energy initiatives. A single, farm-scale wind turbine is due to be erected in February 2015 at Nisbet Farm; three similar ones are suggested for discrete installation on three other farms, one being Broomrigg to link with other activities there. Likewise when opportunities arise for biomass heating and solar panels on sheds, these will be the favoured energy source.



Tourism

The proposals emerging around Broomrigg Farm are what excites us most from all of these plans.

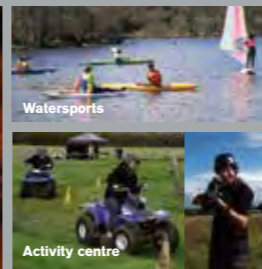
The old steading, with its red doors, oozes character but is no longer suited for modern farming; we would refurbish it as a venue for rustic weddings and parties. A new building to the west could accommodate a bakery, café, activity centre and education space, all heated and powered by a biomass boiler and wind turbine. New self-catering accommodation within the woodland would overlook landscaped

lochs created along the Tyne by the proposed sand and gravel excavations. The lochs themselves would create new wetland habitats as well as enabling water-based activities.

Together, these proposals would enable us to enhance the farm for visitors and residents, encompassing education (education space, countryside, farm animals and crops), employment (farm, bakery, visitor accommodation, wedding venue and activity centre), conservation (wildlife habitats), heritage (iron-age settlement investigations) and food from the land (bakery).

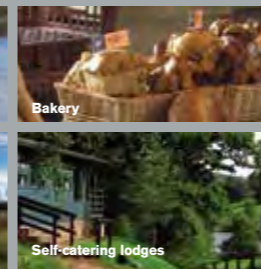


Social functions



Watersports

Activity centre



Bakery

Self-catering lodges



Iron-age settlement

East Lothian Rural Voice

Community perspectives on the
future of East Lothian's countryside

January 2013

nick wright planning
www.nickwrightplanning.co.uk

 **urban animation**
planning + urban design consultants



COMMUNITIES

- continue to grow organically
- schools key to future of smaller communities + quality secondary schools in the county
- local amenities or facilities - shops, pubs etc.
- more local job creation + people working from home (part of the 31% good jobs)
- will planning give due consideration to needs support local business creation?



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Executive summary

East Lothian Council intends to replace the existing Local Plan in two to three years' time. To inform how the new plan will handle the rural dimension, surveyors and architects Chalmers & Co agreed with East Lothian Council to identify a 'rural voice' from the rural community in East Lothian, through use of the local press, online survey and a workshop. The aim was to put forward as credible a Rural Voice as possible.

Participation was drawn openly from residents, businesses, landowners, professional advisors and public agencies. 40 people participated in a workshop and 36 people responded to an online survey. Specialist facilitators Nick Wright Planning and Urban Animation were commissioned to facilitate the workshop, analyse the outputs from the workshop and survey, and prepare this report.

The report aims to be a summary of the Rural Voice emerging from the survey and the workshop, and as input to the Council on East Lothian's 'rural voice' as it prepares to publish its Main Issues Report for publication in 2013.

The results are considered in detail in the report. Analysis of the results identified a number of potential growth sectors for rural East Lothian:

Potential growth sectors

- 1 Agriculture & minerals
- 2 Renewable energy generation
- 3 Tourism & recreation
- 4 Sustainable communities
- 5 Transport & broadband infrastructure

In addition, a number of important themes emerge for the next generation of rural planning policy:

Themes for future rural planning policy

- 1 Build on local assets
- 2 Prioritise local enterprise & initiative
- 3 Proactive public sector
- 4 Flexible & responsive planning policy
- 5 Good quality design
- 6 Retain local facilities

It was clear that **no change is not an option.**

There is a good opportunity for the Council to break new ground with an integrated rural planning policy that releases rural economic potential, enables sustainable communities, and conserves natural resources.

The workshop and survey outputs also suggested five other areas that the forthcoming Main Issues Report could usefully address:

Other areas for the Main Issues Report to address

- 1 The nature of rural settlements
- 2 Linking economic development strategy, land use planning and Community Planning
- 3 A positive planning policy framework
- 4 Managed planning experiments
- 5 Defining *appropriate rural development*

The Council now has an excellent opportunity to break new ground in Scotland with an integrated rural planning and economic development policy that releases the countryside's potential, creates truly sustainable rural communities, conserves natural resources, and shows that East Lothian is open for business. That, surely, is a goal worth striving for.

Finally, it is worth noting that this work offer valuable lessons for other local authorities. Firstly, around leveraging in additional private sector resources to support public consultation. Secondly, using the local networks and credibility of partners like Chalmers & Co to enable greater reach into rural business and community sectors. Finally, the approach identifies fresh, locally sensitive ways for planning to support rural economies and communities.

Thanks to Chalmers & Co and East Lothian Council for initiating, organising and supporting the work, and to all participants who took part in the workshop and survey.

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B	Workshop groupwork outputs
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1 Introduction and context

Background

East Lothian Council is currently preparing its Main Issues Report. This is the first statutory stage in the preparation of a new East Lothian Local Development Plan, which will replace the existing East Lothian Local Plan in two to three years' time.¹

The Main Issues Report will consult the public on the main land use planning issues facing East Lothian, and offer the Council's preferred options in response to these issues; after the public consultation, the Council will prepare a draft plan.

To help inform the content of the Main Issues Report, the Council carried out a series of public engagement events in early 2012 in partnership with Planning Aid for Scotland². These events were carried out in each of the main towns in East Lothian, together with special events for businesses and community groups.

Local surveyors, architects and estate agents Chalmers & Co, based in Haddington, felt that the forthcoming Main Issues Report should also be informed by the views of those who live and work in the rural areas of East Lothian. With the support of the Council and coverage in the press, Chalmers & Co undertook an online survey and

organised a workshop to add a rural dimension to the pre Main Issues Report consultation.

Specialist facilitators and planners Nick Wright Planning and Urban Animation were commissioned to facilitate the workshop, analyse the online survey findings and prepare this report. They liaised closely with East Lothian Council and Chalmers & Co to ensure that the workshop design would provide useful input for the Main Issues Report.

This report aims to be a representative summary of the online survey and workshop discussion. It is intended to provide the Council with a rural perspective as it prepares the Main Issues Report for publication in 2013, as well as being part of the Council's economic development strategy. The authors are grateful to all those who participated in the survey and workshop, and to Chalmers & Co and East Lothian Council for initiating, organising and supporting the work.

Survey and workshop

The **online survey** asked a series of 9 questions relating to rural planning issues in East Lothian.

It was emailed to a cross-section of over 200 local residents, farmers, business people, elected members and professionals in East Lothian, as well as being publicised in the press. 36 responses were received. They are summarised in chapter 2 of this report.

¹ The Local Plan, or Local Development Plan as it will in future be known, contains local planning policy for East Lothian for the next ten to fifteen years and is used to assess planning applications.

² See www.planningaidforscotland.org.uk

The **workshop** – entitled *Rural Voice* – took place on the afternoon of 28 November 2012 at Winton House, near Pencaitland. Its purpose was to generate material which could enable the facilitators and the Council to consider how the Main Issues Report should plan for the future of rural East Lothian.

Invitations were sent to approximately 100 people from the private, community and public sectors who live and work in East Lothian's countryside and villages. 40 people participated in the workshop. They included:

- Residents
- Community groups
- Businesses
- Farmers
- Landowners
- Developers
- Architects, land agents and planners
- Public sector agencies

The workshop was deliberately organised to be as interactive as possible, with the aim of sharing ideas amongst those present about the future of East Lothian's countryside. Participants spent much of the 2 hour session in discussions. The facilitators' emphasis was on encouraging participants to be creative and imaginative, to share their own knowledge and experience of rural areas in East Lothian and beyond, and to explore each other's aspirations for future change.

The workshop discussions are summarised in chapter 3 of this report.

Reporting v. analysis

As explained above, chapters 2 and 3 of this report comprise **summaries** of the survey responses and workshop discussions. They are effectively reports of the survey and workshop findings, necessarily edited for ease of understanding.

Chapter 4 of the report presents the **authors' analysis** of the workshop and survey findings, including a number of pointers for future planning policy. To be clear, the content of

chapter 4 is the authors' analysis of what survey respondents and workshop participants said.

Lessons for other rural areas

This pioneering workshop was a first for Scotland. It is the first dedicated public engagement event to seek 'the rural voice' in this way as input to a Main Issues Report. Equally importantly, it is a ground-breaking partnership between a local authority and the private sector (Chalmers & Co) to deliver public engagement.

This gives three valuable lessons for other local authorities. Firstly, around leveraging additional private sector resources to support public consultation. Secondly, the local networks and credibility of partners like Chalmers & Co enable greater reach into the rural business and community sectors. Finally, the approach used draws out fresh, locally sensitive ways for planning to support rural economies and communities.

Current planning policy

Everywhere – city, town or countryside – changes over time. One of planning's main purposes is to manage that change. The way that the planning system achieves that is by planning policy.

At the **national** level, the Scottish Government's overarching purpose is to increase **sustainable economic growth**.³

Scottish Planning Policy is quite clear about the connection between rural planning and the government's purpose of sustainable economic growth:

*"The planning system has a significant role in supporting sustainable economic growth in rural areas. By taking a positive approach to new development, planning authorities can help to create the right conditions for rural businesses and communities to flourish."*⁴

³ See <http://www.scotland.gov.uk/About>

⁴ Scottish Planning Policy, 2010 (paragraph 92). See <http://goo.gl/ckvQQ>

At the 'regional' level, the **Edinburgh and the Lothians Structure Plan** sets out strategic planning policy and proposals for Edinburgh and the Lothians. This document will be replaced by SESplan (South East Scotland plan) in due course, covering the Scottish Borders and parts of Fife.

Both documents focus on strategic issues, directing housing and employment developments in East Lothian to large sites along the A1 corridor and east coast rail route. Rural East Lothian is identified as an area of restraint, where development should be contained due to infrastructure, landscape, built heritage and other environmental objectives.

The **local** planning policy framework is provided by the **East Lothian Local Plan**, which was adopted in 2008. The Local Plan sits within the Structure Plan framework. It notes that the countryside and coast of the county are valuable assets. Much of the land is in highly productive agricultural use. The attractive landscape, fine coastline and numerous golf courses bring tourists and visitors to the area.

The Plan notes that rural East Lothian is not considered remote in terms of travel distances and the population level is stable (unlike some of Scotland's other rural areas, where population is falling). The Plan states there is 'little need for regeneration, renewal or action' in the rural area.

As a result, the Council's current planning policies are designed to contain development within villages and groups of buildings and support businesses which are appropriate for the countryside. The Local Plan does not support other general development in the rural area, outside established villages and towns. This policy framework has made a clear distinction between urban and rural areas. Housing and employment growth is directed to East Lothian's main towns, whilst the rural area is seen largely as an attractive asset to be protected from development. In previous years of economic boom, this approach may have served the rural area well in terms of avoiding over development.

Is it appropriate to continue with a policy of restraint in the rural area? Should an alternative

strategy be adopted to secure a sustainable future for rural communities and areas?

The forthcoming Main Issues Report is an opportunity to consider these questions, and to assess the needs of rural East Lothian in the context of economic and social change.

Change in the countryside

To help the process of developing the next Local Development Plan, the Rural Voice workshop and survey engaged people in discussions about change in East Lothian's countryside.

The workshop discussion began by asking participants to look back: how had the countryside changed over the last ten to fifteen years, in participants' experience? From these conversations, an interesting perspective emerged of how the countryside has changed in recent years, and what it is like at the moment.

The six main points were, in no particular order:

- Changing **work patterns** – more homeworking and more commuting, driven partly by A1 improvements and improved information technology.
- More energy production through **renewables**.
- Changing **agricultural operations** and scale – e.g. less livestock, more arable, bigger buildings.
- Perceived differences between communities **north and south of A1** – with the north faring better.
- **Limited employment related development** – especially since the credit crunch in 2008.
- Concerns about the nature of new development: **design quality, suburban feel, lack of community benefit, rapid expansion of some villages**.

This view from those who live and work in East Lothian's countryside reflects national trends in the UK countryside. Recent research undertaken on behalf of the Carnegie UK Trust⁵ confirms the

⁵ 'Future Directions in Rural Development' by Professor Mark Shucksmith of the Centre for Rural Economy, Newcastle University; Carnegie UK Trust, 2012

impact of the changing role of technology on the rural economy in recent years, agricultural activity becoming increasingly capital intensive, and a growth of service employment in rural areas (sometimes referred to as the 'New Rural Economy'⁶).

The Carnegie research challenges the conventional urban-centric view that rural economies are pulled along in the wake of urban 'engines of growth'. It presents compelling evidence that rural areas have considerable economic potential themselves. It has been found, for example, that innovation is greater in rural areas than in urban⁷, that productivity is growing faster, and around 2 million people are using broadband to work from home in rural England. In a report to the Prime Minister in 2008, the Commission for Rural Communities stated that the untapped economic potential of rural areas may add between £246 billion and £347 billion per annum to the English economy if policies supported rural economic development.⁸ (Unfortunately no comparable figure has been calculated for Scotland.)

Making the most of this rural potential is an important theme of this report and of Scottish Planning Policy.

⁶ Matthew Taylor *'Living Working Countryside: The Taylor Review of Rural Economy and Affordable Housing'* Department for Communities & Local Government, 2008

⁷ BOP and Experian *'Creative Countryside: Creative Industries Driving New Rural Economies'* Report for Scottish Enterprise, Highlands & Islands Enterprise, One NorthEast, East Riding Council and Lancashire County Council, 2007

⁸ Commission for Rural Communities *'England's rural areas: steps to release their economic potential'* Advice from the Rural Advocate to the Prime Minister, 2008

3 Survey results

The online survey organised by Chalmers and Co sought responses to a series of 9 questions around rural planning. The 36 respondents – rural businesses and residents throughout East Lothian – offer valuable perspectives into current issues. The responses also helped to shape the workshop discussions.

The questions are reproduced in their entirety in this chapter. Each question is accompanied by a brief summary of responses, together with selected quotes to provide additional insight.

The survey responses can be read verbatim in Appendix D (separately bound).

Renewables

Question 1 At a recent Chalmers & Co Question Time, a show of hands suggested renewable energy for electricity and heat has its place in the countryside, but as part of a mix including wind, solar and biomass (woodchip).

Where would you draw limits and what would you encourage? For instance, should any restrictions be placed on the height or numbers of wind turbines in a farm setting?

Although renewable power generation often gives rise to polarised views, there was in fact plenty of common ground amongst the 35 respondents to this question. Renewables were seen by most, if not all, respondents as an important source of energy and income which should be supported.

A mixture of wind, solar, marine and biomass was seen as most appropriate for East Lothian, rather than one dominant form of production. Large groups of tall wind turbines emerge as the biggest concern, particularly where they are prominent on the skyline. Many respondents suggested that 1 or 2 “small” turbines (for example up to 50-100kw), linked to individual farms or businesses, would be more acceptable.

“Single turbines, tailored to the farms requirements, would prevent overly large structures or clusters whilst serving the needs of the business in a sustainable manner.”

“Encourage a mix of wind, solar, marine and biomass energy sources”

“1,2 or 3 small turbines cleverly linked in to a farm steading makes good sense. Sticking up large turbines on low ground almost inevitably intrudes”

“Scotland attracts many tourists and gets income from its landscape and history. Some areas must be protected.”

“Renewables make sense and should be supported”

Housing and communities

Question 2 Current proposals promote large, new settlements or extensions to existing main towns rather than adding to existing rural communities. Do you support this? If not how much would you allow existing settlements to grow over 10 years? Should this be measured as a percentage of an existing settlement size? If so – by how much?

The majority of the 36 respondents to this question saw a need for new housing everywhere – towns and villages.

The main benefit cited for new housing in villages and the countryside was that it would help to sustain rural communities: *“Small communities where there is a primary school, a post office or store and a community hall should be enabled to grow in order to maintain those facilities”*.

But most respondents also thought that expansion needs to be managed sensitively. The pace of development must not be too fast for the size of the settlement. New housing must be better designed, and have good facilities and infrastructure. Young families must be able to afford to live in new houses, and there should be some self-build plots. And each community should have some say in what they want their place to be like in the future.

“Yes but some smaller villages must be able to expand to keep the local school/rural village life alive with young blood.”

“Most rural communities and main towns could accommodate some growth. I don't however have a problem with new settlements.”

“in rural locations one or two additional houses can make a big difference and redundant farm buildings should be utilised for housing”

“Rural settlements must be allowed to expand at say 5-10%/year or they will become ghost settlements made up of retired or commuter based residents.”

“I think expansion needs to be handled very sensitively. Some settlements could easily accommodate growth without their nature being changed. For others even two more houses would have a dramatic effect.”

“My preference, rather than letting developers run all projects, is to follow examples from e.g. Almere in the Netherlands, where self-build plots are released, in a designed layout, which promotes variety and allows people to build and live in the kind of houses they desire at an affordable price.”

Question 3 What are the essential ingredients for vibrant rural communities? Can you supply examples?

According to respondents:

- Balanced/varied community
- Employment opportunities
- Public transport
- Broadband
- School
- Places to meet: pub, school, church, shop etc
- Shop
- Church
- Mix of housing, including affordable
- Steady growth - opportunities to build new houses and businesses
- Good public spaces
- Sense of belonging & willing to get involved

- Leadership with vision and momentum

“probably most importantly a community spirit”

“A balance in the community. One third living and working in the rural community, one third commuting and one third retired.”

“A core of families living and working in the community. This requires local job opportunities and low cost housing.”

“A vibrant rural community requires easy access to employment and quality schooling, transport to medical facilities, a viable shop and a village hall or other public building in which the community can meet.”

Minerals

Question 4 Though East Lothian still has considerable reserves of coal, rock sand and gravel, currently mineral working is restricted to four sites overall across the county. Would you like to see mineral extraction develop and should more licences be granted? Why, or why not?

The majority of the 35 respondents regarded minerals as a valuable resource to satisfy demand and help the local economy, if the right controls are in place to ensure that communities and the landscape were not adversely affected.

A few people suggested that supplying local sand and gravel for local construction needs makes sense as it reduces the need for transport.

Only a small number of respondents were against more minerals extraction.

“Everyone uses aggregates but no-one wants quarries.”

“Mineral extraction creates employment, fills needs and provides an opportunity for suitable site developments after extraction.”

“Yes, but place restrictions on lorry sizes and make them PAY for road repairs.”

“With modern equipment and proper marketing of the mineral it should be possible to have a maximum exploitation time of 5 years in sensitive areas and probably less.”

“No objection. Industrial scars can be temporary and repair / recover quickly. The exception being e.g. an exposed site like Traprain Law quarry.”

“No - era has passed.”

“the ecology, landscape and traditions of East Lothian are very valuable assets and it is essential that they are preserved. More mining licences should only be granted for low quality, non-agricultural land which is not near to scenic sites, SSSI's, housing or historical areas.”

“I am happy for mineral extraction to be developed so long as wildlife habitats are protected during operation and that the site is landscaped for environmental / biodiversity gain once operations are complete.”

“The excavation of rock sand and gravel for local construction should be encouraged, but coal should await an effective scheme for carbon capture.”

“Jobs are vital in this county and mineral extraction can provide this but we must take the public along and NIMBYISM will always be an issue.”

“undoubtedly there are suitable sites that wrongly are getting refused”

Question 5 Should alternative uses following extraction or development be regarded as justification for consent (e.g. water park after sand & gravel extraction)?

Yes 17 respondents (49%)

Maybe 14 respondents (40%)

No 4 respondents (11%)

Comments included:

- Depends on circumstances
- Only if in long term interests of community
- Must not be a bribe to the community
- Long timescales can make it hard to plan reinstatement activities so far ahead

Tourism

Question 6 East Lothian has the potential for significant tourism spend; golf has played a strong lead along the coast in particular, but there is less tourism inland. Do you believe tourism is worth promoting in rural areas and if so, how should this be balanced against other enterprises?

The vast majority of the 34 respondents strongly supported more tourism, largely because of the economic benefit that it brings. Many respondents noted that East Lothian has much to offer tourists, and that it should be promoted more vigorously.

Particular ideas included:

- low-impact / enhanced biodiversity tourism, such as birdwatching or red squirrels at Paxton House
- sailing at Whiteadder Reservoir
- walks, cycling and pony trekking in the Lammermuirs
- complete 'infrastructure' such as cycle routes and paths
- live and target shooting, fishing
- make more of festivals like Lennoxlove Book Festival and Lammermuir Festival
- B&Bs and holiday lets
- promote inland golf courses like Gifford

“planning regulations mustn’t get in the way of rural businesses wanting to diversify”

“East Lothian has much to offer and should capitalise on heritage and natural environment tourism opportunities”

“Outdoor recreation can complement and bolster other rural enterprises such as farming if potential conflicts (e.g. access) are well managed”

“it will take entrepreneurial spirit to create such enterprises, they should not be hindered by planning”

Infrastructure investment

Question 7 If large scale infrastructure investment is needed, what would be your priorities? Would they include, for instance, an extension of the rail links, or super fast broadband.

Broadband	24 respondents
Better rail links*	17 respondents
Better mobile phone network	4 respondents
Complete dualling of A1 to Berwick and beyond	4 respondents
Better bus services	3 respondents
Better rural roads	2 respondents

* Better services, reopening East Linton station, more park and ride, reinstate Haddington rail link.

Second homes

Question 8 Should we follow examples of Scandinavian countries where second homes are commonplace in the countryside with the resulting economic benefits?

There was considerable reticence about this suggestion:

No	19 respondents (56%)
Uncertain	13 respondents (38%)
Yes	2 respondents (6%)

The following quotes explain respondents' concerns:

"With the current housing shortage I'm not sure that this is appropriate. People living and working in the rural communities being priced out of their homes."

"Second homes in the countryside do not always bring economic benefit to local communities."

"empty houses in a rural area for long periods of the year are not desirable"

"community spirit would be harmed"

"Not necessary near Edinburgh."

"I think there is scope for something like a country park with holiday barns/lodges etc like in Nottingham or Penrith - good local mountain and road biking and a few lochs, nice pubs etc."

"Yes, many steadying conversions and quality planned rural holiday hamlets can be seen to be attractive and economically beneficial in Perthshire (Aberfeldy for example). These seem to exist sympathetically beside rural life."

"The key is to ensure that there is a supply of affordable homes for those who live and work locally. To legislate against second homes is to distort market forces and to remove substantial external investment"

General comments

Question 9 Are there any other key planning issues which you would like to raise?

27 respondents provided additional comments. The following issues were raised by more than one respondent:

- By far the most common comment (13 respondents) was concern about the planning process – particularly the speed of processing applications.
- 4 respondents expressed an aspiration to facilitate more small scale development in villages and the countryside, as opposed to suburban style land release.
- 2 respondents emphasised the need for more low cost rural housing.

The following quotes explain other issues not already referred to above:

"Each village surely needs an industrial zone. Business zone for offices/work zone for businesses? Maybe not pure industrial. Bring day time occupation back to villages. Keep people living there. Avoid pure retirement areas. Retirees may like them but not a healthy idea."

"Energy, tourism, minerals, housing are not mutually exclusive. The development of a quarry, for example, could facilitate immediate habitat and access development, which could encourage rural tourism."

"I think it is all about prevention of leakage - stop that and the money will stay and then start to come in from other sources. Town centres need to have the shops for rural communities or they will be by-passed and die and become a drain on the rural budget. These country towns are part of the rural communities' lives and both need to ask what they can do for one another."

"Currently there are around 11,500 jobs in East Lothian, the majority of these being in the public sector. A very large number commute every day into Edinburgh. Measures to increase employment opportunities in East Lothian (in which superfast broadband should be available) should take a high priority in future planning."

3 Workshop discussions

The main part of the workshop asked participants to think about the future of East Lothian’s countryside. The question that participants were asked was:

What changes do you want to see in East Lothian’s countryside in the next 10-15 years?

Participants were asked to consider:

- What will a productive, vibrant countryside and villages look like in 2025?
- How will they function?
- How will they be different from now?
- What shouldn’t change?

The 40 participants were split into a number of groups to undertake the task. Each group had a different starting point to ensure that all necessary dimensions were covered. The different starting points were:

- Renewable energy, quarrying, minerals
- Farming, forestry
- Tourism, recreation, crafts
- Rural life, communities

The design of the exercise deliberately encouraged participants to consider rural business and enterprise (although they were not limited to those issues). This was to reflect the Scottish Government’s purpose of increasing sustainable economic growth (see page 5 above) and the Council’s ambition to create new employment.

Participants were provided with handouts providing factual information on East Lothian including education, employment, health, quality

of life, climate change, housing and population change (see appendix A). The purpose was to ensure that participants’ perceptions were informed by some essential local statistics, without wishing to steer their discussions in any particular directions.

Each group prepared a flipchart sheet which summarised their main points in response to the question. These sheets were then shared with the workshop as a whole and prompted general discussion. The original sheets are reproduced in appendix B.

A summary transcript of the points made during the workshop discussions can be found at appendix C.

This chapter contains the authors’ summary of responses. The headings used are from the authors’ own analysis.

Potential growth sectors

The report authors’ analysis of the workshop discussions identified five potential growth sectors for rural East Lothian.

Potential growth sectors

- 1 Agriculture & minerals
- 2 Renewable energy generation
- 3 Tourism & recreation
- 4 Sustainable communities
- 5 Transport & broadband infrastructure

1 Agriculture and minerals

Agriculture is envisaged as remaining a vital part of East Lothian's rural economy. The scale and nature of agricultural operations will continue to evolve: the trends are less livestock, more arable, and bigger operations and buildings. Farms need ongoing investment to remain competitive.

Participants suggested that there is also scope for more small scale agricultural businesses, reflecting lifestyle and new entrant trend. A co-operative approach may be a way of achieving scale economies and competitiveness – which is difficult for individual small businesses like farm shops.

There was a call for greater flexibility on conversion of existing buildings, including larger agricultural structures, to encourage more development proposals. Refurbishing older buildings is often more expensive than new build, so the existing policy requirement to refurbish can compromise or deter new development.

It was suggested that East Lothian should aspire to be both minerals and energy self-sufficient.

The important role of farmers in maintaining land was highlighted, particularly in relation to alleviating flooding.

One challenging question remained unresolved: how to secure and manage community benefits from mineral extraction and renewable energy generation?

2 Renewable energy generation

There was a general aspiration for more community owned renewable energy production (particularly wind, but also biomass and other sources), and for appropriate community benefits to be derived from renewables developments. More infrastructure may be required to maximise the potential of renewables, particularly in the east of the county where Torness has potential to be a focus for mixed energy production.

As far as landscape impact was concerned, the main point was that individual or small groups of wind turbines are more acceptable than large scale windfarms.

As stated above, it was suggested that East Lothian should aspire to be both minerals and energy self-sufficient – 'local energy for local people'. Continuing government policy support will be critical if this is to be achieved.

3 Tourism and recreation

The tourism sector is better developed in the north of the county, where the traditional attractions of coast, castles and golf combine with better tourist facilities and infrastructure.

But the southern part of East Lothian, south of the A1, offers plenty of potential for more innovative or adventurous forms of tourism such as walking and mountain biking in the countryside and hills.

The range and choice of overnight visitor accommodation needs to be improved across East Lothian. Similarly, there is potential to expand the already growing local food and crafts offering. Better north-south connections within East Lothian (particularly public transport) would mean that the south of the county is better connected to existing tourist honeypots in the north.

The marketing of East Lothian needs to improve, not least to the huge pool of potential visitors in Edinburgh.

4 Sustainable communities

A vision of healthy, sustainable communities was at the heart of many participants' future aspirations for East Lothian's countryside. This means diverse ages and income groups in local communities, local opportunities for employment and enterprise, and local facilities such as schools, shops and village halls

This in turns suggests a need for:

- housing development of different types, sizes and affordability

- more local business opportunities and workspace
- more conversion of rural buildings for other uses
- good quality new build
- good roads, services and broadband infrastructure

5 Transport and broadband infrastructure

Superfast broadband is regarded as important as other utilities – a basic essential for business and everyday life. A failure to invest in broadband would be a threat for East Lothian, whereas investment in improved services would create an opportunity.

Better north-south transport connections within East Lothian would help connect existing tourist attractions in the north of the county to potential new businesses in the south.

The east of the county was felt to be in particular need of infrastructure investment, given its distance from Edinburgh.

Themes for future rural planning policy

The report authors also identified six important themes emerging from the workshop which might inform the next generation of rural planning policy in East Lothian:

Themes for future rural planning policy

- 1 Build on local assets
- 2 Prioritise local initiative
- 3 Proactive public sector
- 4 Flexible and responsive policy
- 5 Good quality design
- 6 Retain local facilities

1 Build on local assets

Rural areas possess two types of assets: people and physical resources. **People assets** are the villages and communities, including rural residents and commuters who are increasingly

setting up their own enterprises where they live, and existing rural businesses which wish to expand. **Physical assets** include a great range of opportunities: landscape and habitat, footpath networks, sand and gravel resources, woodland, agricultural land, built heritage and tourist attractions.

Together, these assets provide opportunities to enhance rural communities and employment.

This reflects the finding of the Carnegie research (see pages 4 and 5 above) that rural areas themselves have considerable economic potential.

2 Prioritise local enterprise & initiative

Many participants believed that economic development will come predominantly from local initiative and enterprise rather than external investment (again reflecting the findings of the Carnegie research).

Prioritising this type of local economic development was seen by participants as helping to reduce commuting, create more local employment, and support sustainable communities.

Local initiative and enterprise might be a commuter setting up a home-based business, a farmer investing in new manufacturing plant or processing operations, a landowner or community group opening up new recreational facilities for mountain biking – or many other examples. Enterprises such as these are likely to be based on local assets and strengths.

This focus on enterprise also implies that development should not just be about building homes – it should also create opportunities for employment. One of the requirements is sufficient land for business and employment use in villages and the countryside: Council officers explained that the Call for Sites in early 2012 resulted in a large number of housing sites coming forward from landowners, but almost no employment sites. This needs to be addressed if planning is to encourage enterprise, build sustainable rural communities and reduce commuting.

3 Proactive public sector

To encourage local initiative and enterprise to come forward, the public sector should see itself first and foremost as an enabler. Of course the public sector also has a regulatory function (such as determining planning applications), but the primary purpose should be seen as to encourage **appropriate development** – in line with Scottish Planning Policy for rural areas (see page 5 above).

4 Flexible and responsive policy

Planning policy should be flexible and responsive, promoting growth and opportunities. Allocating specific sites for specific uses may not be appropriate in the rural area, where greater flexibility is required to meet local or individual needs and encourage potential economic development. Some participants suggested that imposing strict policy boundaries around villages deters expansion and investment by existing businesses (although ELC planning officers suggested this perception may not accurately reflect reality).

The call for greater flexibility on conversion of existing buildings has already been mentioned.

5 Good quality design

Many participants saw good design as critical. There is a concern that larger developments have not always respected the character and scale of the rural towns and villages and their countryside setting. Good quality design of smaller buildings is also important.

The general desire was to conserve the particular character and amenity of each village or rural

area, and to allow those places to grow organically and at an appropriate pace. There was little opposition to new development if it is of appropriate scale and design, and if it provides local benefit.

6 Retain local facilities

The question of local benefit was a critical one for most participants. The retention of local facilities like schools and shops (particularly if they are locally owned and managed) was regarded as vital for the future wellbeing of rural communities. Any new development that can help that to happen should be welcomed.

Something needs to change

The report authors identified one thread which ran through all of the discussions: **something needs to change**.

This is not a criticism of existing policy, but a reflection of a tough competitive economic climate and social change. If East Lothian's countryside does not progress and move forward, communities and businesses will struggle and East Lothian will fail to fulfil its potential contribution to national and local government's economic growth objective.

Public sector policy and interventions should fully support rural areas, to sustain communities and enable growth in enterprise and employment.

The next chapter of the report considers some pointers for how future policy could adapt to support a more positive for East Lothian's countryside.

4 Pointers for future planning policy

The workshop and survey made clear to the report authors that East Lothian’s rural area does have a voice – that wants a policy framework which explicitly supports rural communities and economic development, which is of course also an aim of Scottish Planning Policy for rural Scotland).

Supporting the sectors and themes

With ‘something needing to change’, how might the next generation of local planning policy change to implement the **potential growth sectors** (page 11 above) and **planning themes** (page 13) that emerged from the Rural Voice workshop?

This chapter identifies pointers to help future planning policy and the Main Issues Report deliver the positive future changes sought by the rural voice. To be clear, these suggestions have been made by the report authors having considered the survey and workshop outputs.

The next generation of rural planning policy in East Lothian needs to focus on **creating the conditions** that would enable thriving rural economies and communities over the next 10 to 15 years – the lifetime of the forthcoming Local Development Plan. Those conditions should aim to **encourage development and growth from within** – local, indigenous growth based on the countryside’s physical and people assets, as workshop participants expressed so effectively.

The sectors and themes put forward by participants (see pages 11 and 13) should form the **foundation of a refreshed rural planning policy** for East Lothian which is responsive to local aspirations. They are a good basis from which planning professionals can develop supportive planning policies as the Local Development Plan process progresses.

Other areas to address

The workshop findings and survey results also suggest **five other areas that the forthcoming Main Issues Report** could address:

Other areas for the Main Issues Report to address

- 1 The nature of rural settlements
- 2 Linking economic development strategy, land use planning and Community Planning
- 3 A positive planning policy framework
- 4 Managed planning experiments
- 5 Defining *appropriate rural development*

1 The nature of rural settlements

There was a clear aspiration from workshop participants that rural planning policy needs to be fine-grained, down to the level of towns, villages and settlements. It is not appropriate to allocate large development sites for either residential or employment use, where these may be out of scale. Suburban development in rural areas should also be avoided.

Settlement growth could be spread across a number of small sites to ensure appropriate scale, design quality, and pace of development. This might also provide work for local developers and builders, supporting the local economy and helping to build vibrant communities.

Ideally, every village should have a settlement statement which briefly explains its history, identity and character, current issues and future scenarios. It should identify the needs of the settlement and highlight opportunities to sustain it as a vibrant community. The statement should be prepared collaboratively between the planning authority and the community, so that it reflects local identity and aspirations. It should act as part of the framework for guiding development proposals and decisions on planning applications. The settlement statement could be reviewed concurrently with the Local Development Plan cycle.

Settlement statements also offer an opportunity to review rural housing land allocations – particularly in the light of the contribution that population growth can make to support school rolls in villages where there is capacity in the local school. In other words, using forward planning as a way of supporting local services and communities into the future. More opportunity for self-build may be a part of this.

This approach would bring rural communities into the core of East Lothian's spatial strategy, which currently focuses on the main towns.

2 Linking economic development strategy, land use planning and Community Planning

Planning policy cannot single-handedly meet rural East Lothian's aspirations. Many of the aspirations expressed by workshop participants relate to community facilities, tourism marketing, jobs and enterprise – meaning that land use planning really needs to connect with economic development strategy and Community Planning.

It is essential that the Local Development Plan explicitly dovetails with the Council's economic development strategy and Community Plan to create the conditions that encourage rural investment and appropriate development – such

as visitor marketing, broadband, retention of community facilities and better north-south transport connections. The Plan must do more than simply state that it supports these other strategies; it must actively create the conditions for their implementation, through its policies, spatial strategy and proposals.

With Community Planning currently undergoing review at both national and East Lothian levels, there are moves towards a more integrated and collaborative approach – as well as connections with community empowerment through the forthcoming Community Empowerment and Renewal Bill. The time is right to consider how land use planning can better connect with Community Planning to respond to the aspirations expressed through the Rural Voice workshop.

3 A positive planning policy framework

Generally - not just in East Lothian - plans and policy need to use simple positive language that promotes opportunities, possibilities, ambitions and visions, instead of setting out lists of what cannot be done. Getting the right language and tone is important to demonstrate a more enabling, proactive attitude towards rural development.

But there is a need to change more than simply language and tone. There must be substance to policy change. The rules around demolition, conversion, extension and re-use of redundant agricultural buildings need to be more flexible to encourage more development proposals, provided that what is built in their places is well designed. And if, as seems to be the case, the stock of the redundant buildings is drying up, that means that the policy for new build should also be freed up.

There were clear messages from workshop participants that the current policy framework is deterring investment proposals from coming forward, not least because planning permission is perceived as slower or more difficult to gain than other rural areas. There were suggestions that planning permission is seen as such a significant hurdle that 'it is not worth the trouble'. On the other hand, Council planning officials at

the workshop suggested there is limited evidence of this deterrent effect; in fact, East Lothian Council's performance statistics do not compare unfavourably with other Scottish planning authorities.⁹

It is difficult to quantify evidence whether planning policy is deterring development. However, the workshop did record a clear perception that it is not *encouraging* investment. Given the perception from potential rural investors and developers that gaining planning permission is difficult, and the Council's ambition to promote economic development, a review of rural planning policy would be appropriate.

4 Managed planning experiments

Maybe it is time to pilot some new policy initiatives. Here are some suggestions, based on the Rural Voice findings, which would need to be developed in more detail through piloting:

- a. Map-based village envelopes could be replaced by positive **criteria for appropriate development** for each settlement, to encourage more landowners to come forward with development proposals. Rather than limit land release geographically, allow any development which meets set criteria (which might include a limit on the pace of development). This would.
- b. **Adventure tourism** could be promoted, in the manner of the Seven Stanes mountain bike centres across the Southern Uplands.
- c. Ways of promoting viable **mixed residential and employment proposals** could be explored in particular villages.
- d. **Enabling development**: in the future, how could enabling development help to deliver

⁹ The Council's latest statistical reporting states that "Overall, the planning authority's performance compares well with the Scottish average. Our 2011-12 performance of determining 75.2% of all applications in less than two months compares with the Scottish average of 68.1%." One of the service improvement proposals for 2012-13 is to reduce average times to determine applications. See *Report on the Planning Performance Framework* to East Lothian Council's Policy and Performance Review Committee, 27 November 2012 (available at <http://tinyurl.com/ave8xue>).

community, environmental or economic benefits in rural areas? What models or criteria could be used? It is important that this issue is discussed with a range of stakeholders, and the Main Issues Report offers an excellent opportunity to do so.

- e. The Council struggles to identify anything like the amount of deliverable **employment land** it needs, and rural landowners are reluctant to promote employment land. With both supply and demand constrained, change is needed. Maybe it is time to identify some housing sites put forward in the 'Call for Sites' exercise where business uses could be supported; or to free up the criteria for employment use in villages and the countryside. The workshop suggested that a more overtly proactive planning framework may be required to stimulate latent demand.
- f. Pilot a new more flexible approach needs to be tried out based on **entrepreneurs' needs** to develop a business in a specific location, in response to the demand to support more local enterprise and initiative.
- g. **Renewable energy**: the detail of renewable energy policy could be handled through Supplementary Guidance, based on meaningful engagement with local interests, communities, and bigger players in the sector. In the longer term, should East Lothian have a 'strategy' to promote renewable energy generation as a follow on from the closure of Cockenzie and, ultimately, Torness power stations?

There may be scope for further workshops to explore these and other areas in more depth.

5 Defining 'appropriate rural development'

This was a critical issue for many participants at the workshop. Just what is appropriate development in the East Lothian countryside?

Workshop participants were generally not against new development if it provides community benefit and is of appropriate scale and design.

Clearly and simply defining 'appropriate rural development' would provide an essential part of

a new positive rural development planning policy. The Main Issues Report could prove to be a useful tool to help reach a definition. The workshop indicated a number of essential criteria such as:

- design quality
- community benefits – supporting local facilities, enterprises and employment
- a preference for organic settlement growth
- avoidance of critical nature/landscape designations

Some of these criteria are already referred to in the Council's policy relating to development in the countryside. A review of this policy is now required, to reflect changing patterns of travel, employment, retailing, demography, agriculture and communications, as well as the need to encourage development proposals. The balance between the availability of older farm buildings for refurbishment and the need for new buildings to accommodate housing (including affordable), businesses and other uses should also be reviewed.

Richard Heggie, Urban Animation
Nick Wright, Nick Wright Planning
January 2013

Appendix A

Handout for workshop participants

East Lothian

Facts and figures 2010-11

Some positives

- East Lothian has better primary and secondary **school attendance** than the Scottish average.
- The **employment** rate of 72.3% is slightly above the Scottish average of 71% – but is down from 75.5% in 2009.
- Male and female **life expectancy** is significantly better than the Scottish average.
- An estimated 20% of adults **smoke** in East Lothian, well below the Scottish average of 25%.
- The **ecological footprint** of East Lothian residents reduced by 11% to 4.78 global hectares per capita (2010).
- 68% of people rate their **neighbourhood** as a very good place to live (compared to 52% for all of Scotland).
- East Lothian has a relatively low **crime rate** and low number of people in prison.

Some variations

- The proportion of households officially assessed as **homeless** is significantly above the Scottish average.
- An above average number of people live in the 15% most '**access deprived**' (**hard to reach**) areas.
- People are more than twice as likely to be hospitalised for **alcohol** conditions depending on where they live.
- **Life expectancy** varies within the county by 7.1 years for men and 8.1 years for women.
- Women are three times more likely to breastfeed **depending on where they live**.

Future challenges for East Lothian

- Predicted 34% **increase in population** from 2010 to 2033, from 97,500 to 128,000. The population has increased by 8% (7,300 people) since 2001.
- **Economic recession** leading to:
 - rising unemployment and long term youth unemployment
 - increasing stress and decline in well-being
 - increasing debt
 - increase in crime
- In 2010/11, 8% of **households** reported that they were not managing very well, had some financial difficulties or were in deep financial trouble, which is a reduction of 3% from 2009.
- Impact of **welfare changes** on people's wellbeing as an estimated £8-9 million will be taken out of their incomes and hence the local economy.
- Balancing **limited public finances** with growing demand and expectations for services as our population grows.
- **Climate change** – dependency on fossil fuels.

Sources:

- East Lothian Single Outcome Agreement: Annual Performance Report 2010-11 (East Lothian Community Planning Partnership)
- East Lothian Facts and Figures (East Lothian Council)

Appendix B

Workshop groupwork outputs

The following pages show the flipchart sheets which were presented by each group to the workshop as a whole, summarising their response to the question: what changes do you want to see in East Lothian's countryside in the next 10-15 years?

- Table 1: starting point – renewables, quarrying, minerals
- Table 2: starting point – farming, forestry
- Table 3: starting point – tourism, recreation, crafts
- Table 4: starting point – rural life, communities
- Table 5: general, no particular starting point

Table 1: starting point - renewables, quarrying, minerals

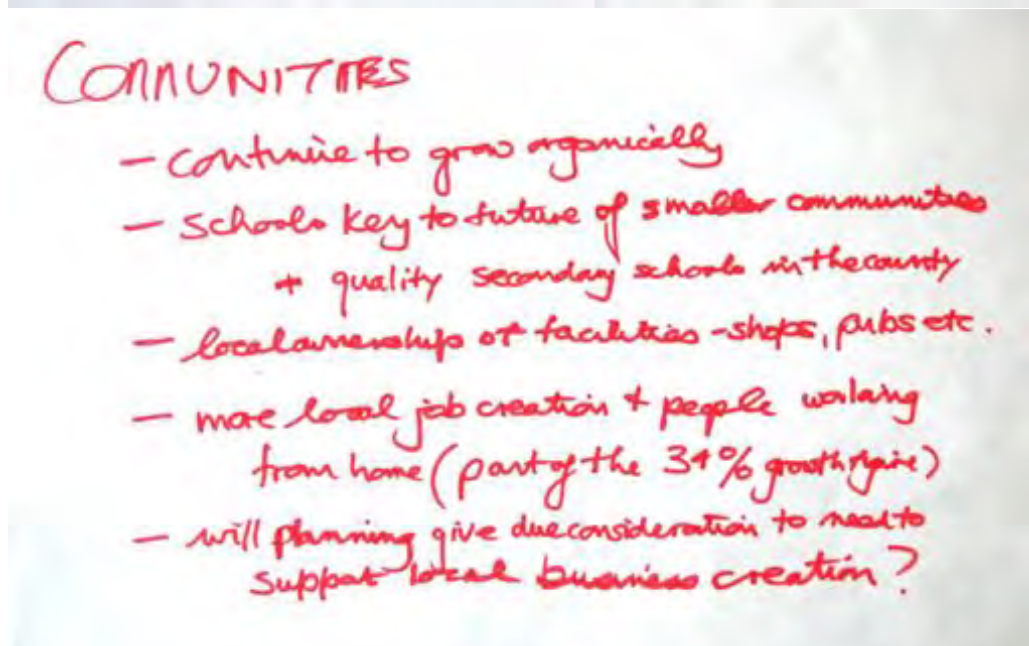
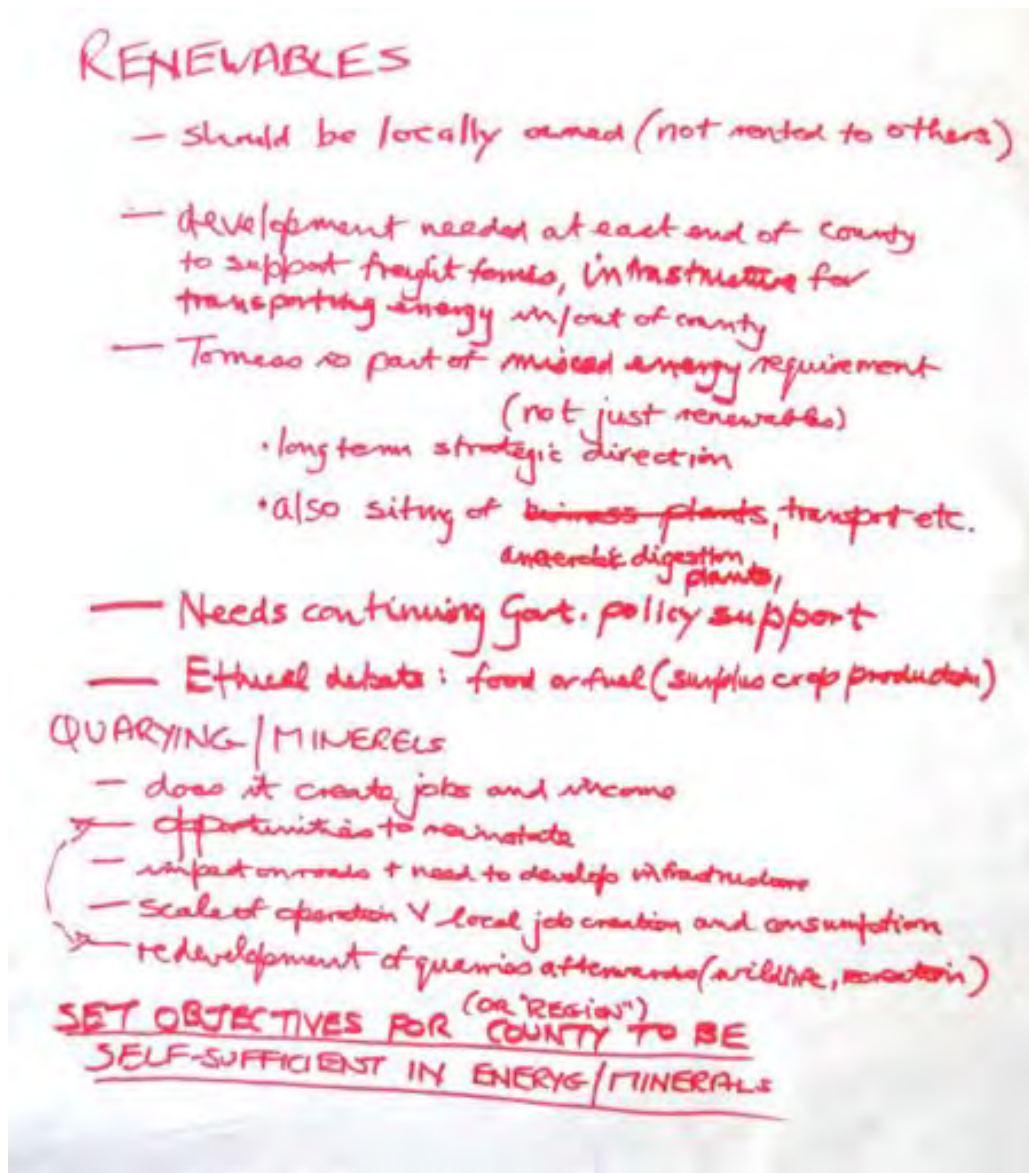
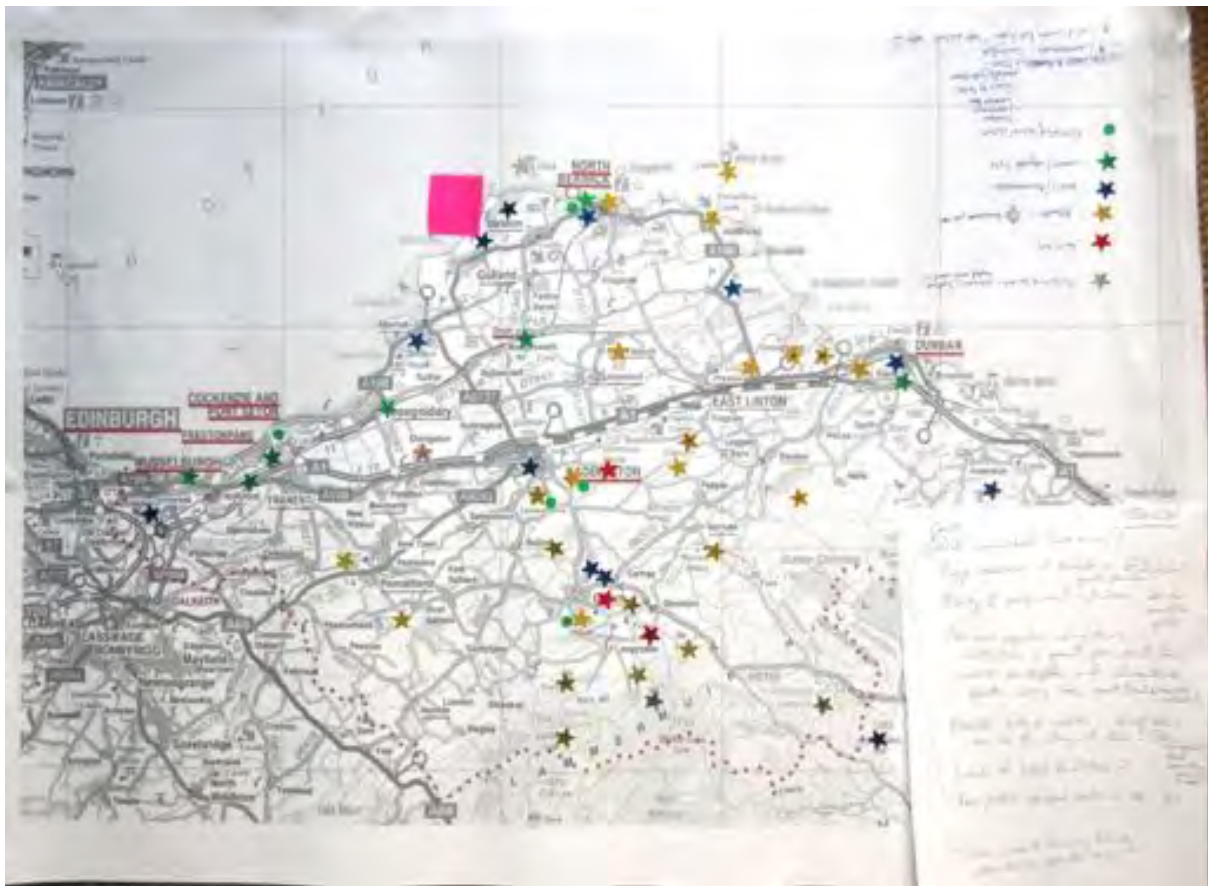


Table 2: starting point – farming, forestry

1. FAR MORE EFFICIENT USE OF EXISTING (LIMITED) RESOURCES
 - ORGANISATIONAL IMPROVEMENTS: / 'COOPERATIVES'
 - FEWER BIGGER OPERATORS. (FARMING)
 - LOCALISED USE OF ~~FARMING~~ FORESTRY RESOURCES.
2. MORE FLEXIBILITY IN 'DCI': REDUNDANT FARM/RURAL BUILDING.
3. FLEXIBILITY IN APPROACH TOWARDS HERITAGE ASSETS.
4. PROMOTION OF LOCAL ENERGY FOR LOCAL PEOPLE
PD RIGHTS / PRESUMPTION IN FAVOUR.
5. BETTER UNDERSTANDING / PROACTIVE RESPONSE TO TOWN & RURAL CONFLICT OR RELATIONSHIP.

Table 3: tourism, recreation, crafts



- ★ - The Saltire Centre - everyone - Scotland should know about it.
- ★ - Rural Golf
- ★ - Attractions - recreational potential
- ★ - Hotels/Accommodation.
- ★ - stations/integrated links
- - Festivals of 'national' stature
 - 3 harbours
 - Lammesmuir
 - Lammesmuir folk
 - Fringe by the Sea potential @ Yester House

Wildlife Tourism & Recreation + Access

- * Lammesmuir - 'Country Parks'
- * Core & Country Path System - better advertised... better use

TOURISM

Get Well connected (road & rail)

Huge reservoir of tourists in Edinburgh - great potential

Plenty of traditional activities beach castle golf

Few new popular adventure activities - great potential for more countryside and adventure sports away from coast (but a tourist market)

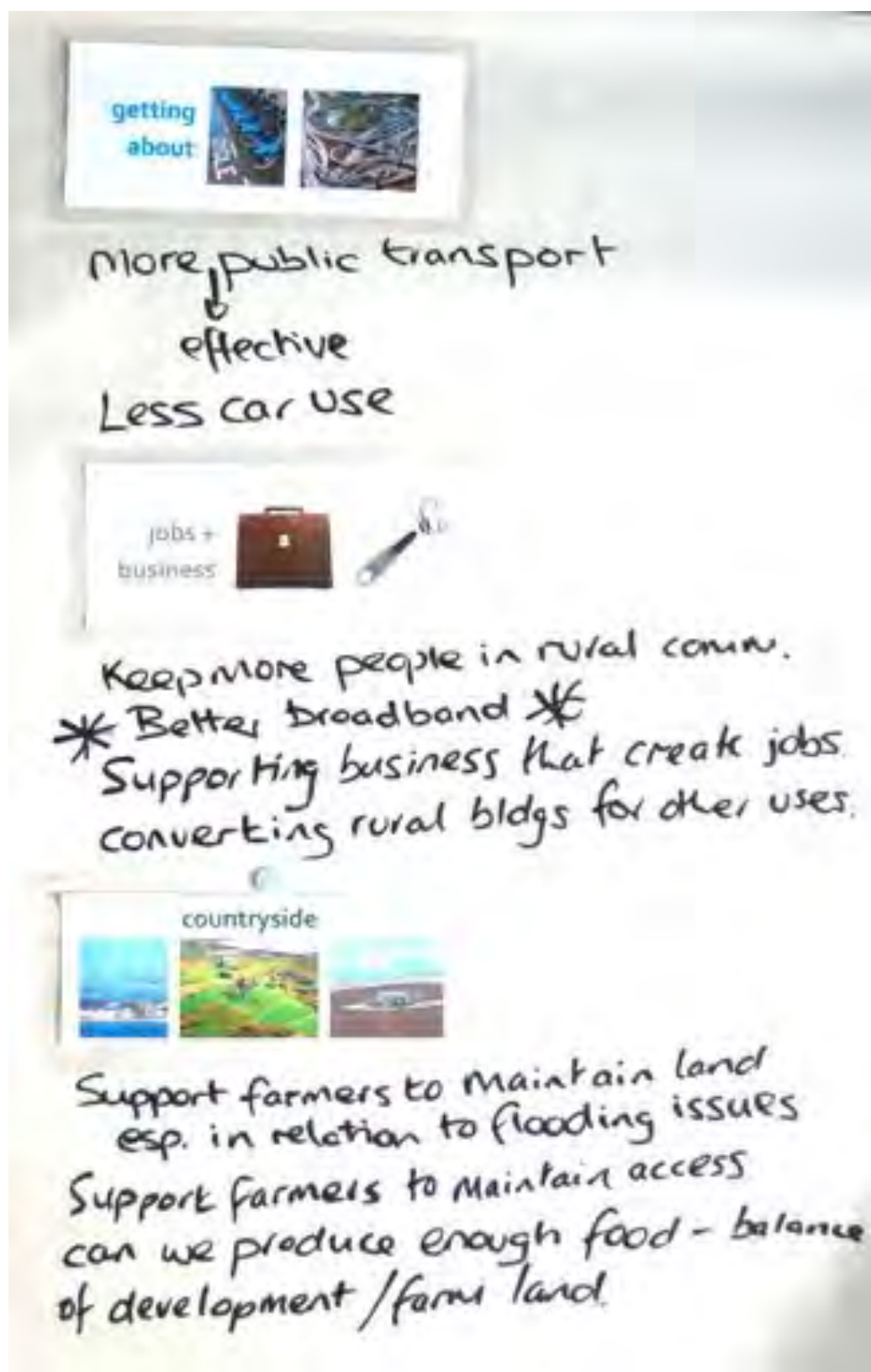
Promote arts & crafts - East Lothian can do it. Why not EL? (EL successful food production & arts)

Lack of hotel facilities?

Poor public transport south of the A1.

Does current Planning Policy allow for or provide this?

Table 4: starting point – rural life, communities



health +
wellbeing



Access to countryside
Locals / tourists
Quality amenity - transport (public)
Aging population
Importance of 'community' to
look after old / infirm, etc.
Village halls + facilities

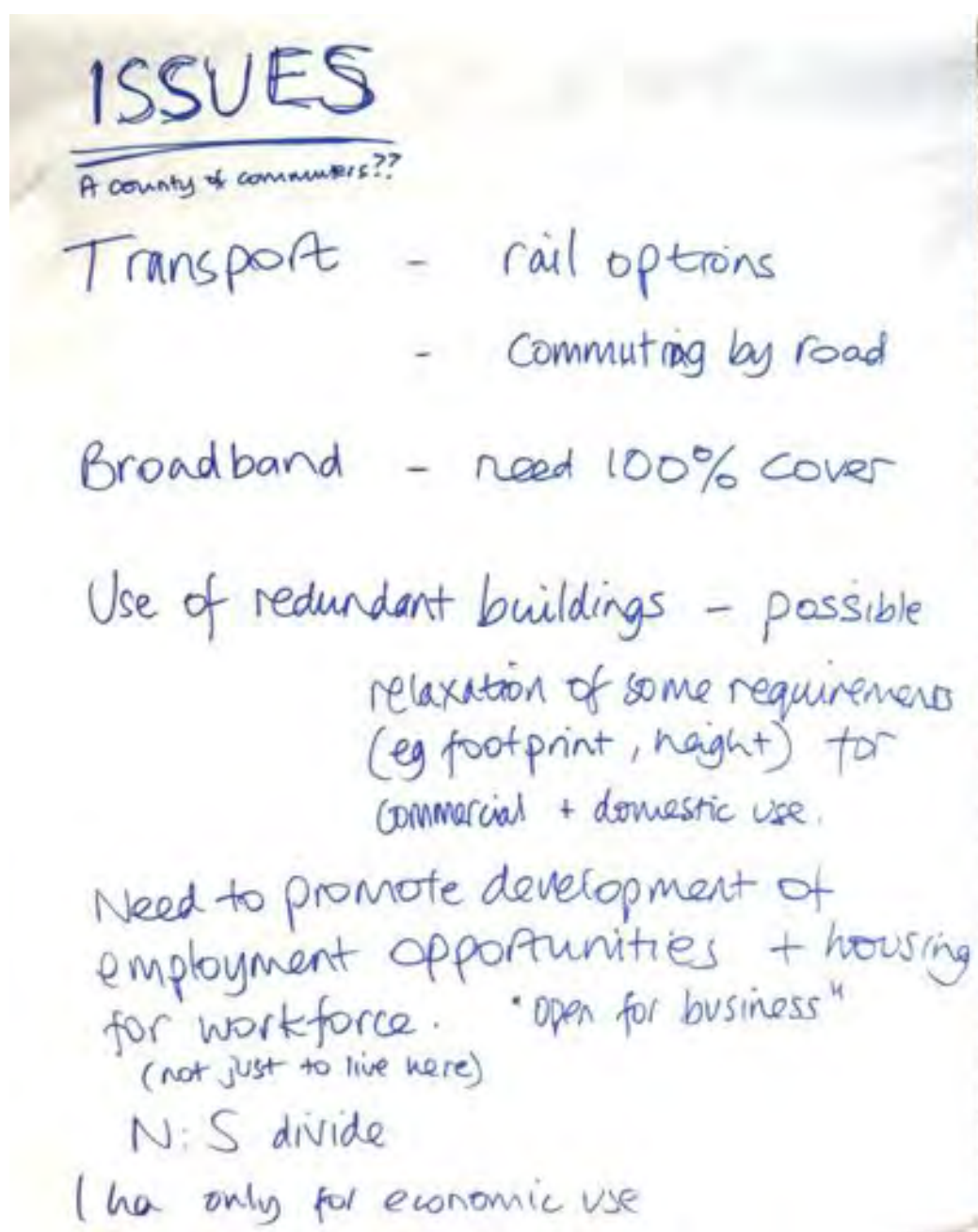
housing
need



Quality new build schemes essential
Planners to look at the bigger picture - schools,
social integration. Too much of same style.
Infrastructure - Electricity
Broadband

COMMUNITY

Table 5: no particular starting point



Appendix C

Summary transcript of workshop discussions

1 Initial discussion: changes in East Lothian's countryside over last 10-15 years

- Communication infrastructure improvements – people can increasingly live, work and play in the same place.
- Some commuters now setting up businesses locally.
- More part-time working.
- Need to reduce dominance of commuting and create more local jobs.
- Need to reduce reliance on public sector
- Some smaller villages have expanded rapidly but many new residents are commuters.
- Increase in agri-environment schemes - management/planting of hedgerows, verges, habitat etc.
- Biomass energy is emerging.
- More specialisation in agriculture - large crops/fields/agricultural units.
- Move towards larger farm buildings.
- Planning policy restricts what can be done with older buildings.
- Lower employment levels in agriculture but growth in foreign labour.
- Less livestock farming, more arable.
- A1 has created easier access + increased traffic.
- House prices increased in Edinburgh so people moved out – driving up East Lothian too.
- Area south of A1 less well served by transport, towns north of A1 have rail and better bus services.
- What's being done to reduce carbon footprint?
- Heavier vehicles and more of them are damaging narrow rural roads.
- Low number of employment related planning applications, for example in last 12 months.

2 Groupwork sessions: looking forward to the next 10-15 years

Groups considered the question “What changes do you want to see in East Lothian's countryside in the next 10-15 years?” Please also refer to flipchart reproductions in appendix C.

Renewables, quarrying, minerals

- Let's have more community owned renewables.
- Renewables infrastructure at eastern part of county?
- Make Torness part of the long term energy supply mix.
- Where can generating plant such as anaerobic digestion be located?
- Develop an improved supply chain for bio materials for energy.
- Seek local benefits/employment etc from minerals/quarry activity; encourage community engagement.
- Could East Lothian aim for energy self-sufficiency?

- Benefits from wind turbines are already happening - but danger of blackmail, where big companies buy off community. Could a community benefit test be applied to windfarms/turbines?

Farming, forestry

- Make more efficient use of land.
- Room to increase woodland resource but perhaps not to national average level.
- Scope for more smaller scale agricultural businesses, reflecting lifestyle and new entrant trend? There are often economies of scale but a co-operative approach might work.
- Rural businesses like farm shops may give the impression of being thriving, but not always as profitable as people think.
- Allow greater flexibility on conversion of existing buildings, including larger agricultural structures. Refurbishing older buildings often more expensive than new build, so

requirement to refurbish compromises development at times.

Tourism, recreation, crafts

- Tourism focus lies north of A1: coast, golf etc. Area to north of A1 perceived as having more going for it – more investment, better facilities and infrastructure, more activity, more attractions.
- Can we use opportunities to boost south side of A1 by improving existing offering and adding new attractions – e.g. mountain biking and adventure tourism?
- Need better north-south connections across A1 (so south is better connected to tourism assets in north).
- Difficulty in getting people to stay overnight in East Lothian - lack of accommodation at all market sectors.
- Expand crafts / local food offering?
- Create a tourist route in southern part of county?
- Opportunity to make more of the Lammermuirs.
- Tourist marketing in East Lothian is too low key.

3 General discussion points

- Superfast broadband is as important as other utilities – it is now a basic essential for business and a key threat or opportunity for East Lothian.
- What spin-off benefits could new housing in the countryside deliver?
- Need to free up rules restricting demolition and re-use of redundant agricultural buildings provided that what is built in their places is well designed. How many redundant buildings are there left now? Existing 'Development in Countryside' policy approach needs to change.
- Development should not just be about building homes – that may just create commuting – but about creating opportunities for employment.

Rural life, communities

- Need to promote village and community life – the components being:
 - local jobs and businesses (not just homeworking)
 - less car use
 - broadband
 - conversion/reuse of buildings especially for tourism and commercial use
 - support farmers to maintain food production, landscape quality, access to countryside, flood prevention etc
 - conserve the particular amenity of villages and rural areas
 - 'looking after each other' – that neighbourliness which is part of the perceived amenity of villages
 - tackle housing need
- All this needs effective infrastructure to facilitate it – broadband and transport.
- Could new housing development at places like Pencaitland be done on a smaller scale – more organic
- What role can housing in the countryside play in delivering a good demographic mix?

- The Council is struggling to identify deliverable employment land in the countryside, and rural landowners prefer housing development. On the demand side, there seems to be little demand from landowners and farmers to come forward with new development proposals, particularly around employment uses; why?
- Not against new development if it provides local benefit and is of appropriate scale and design. Question about how to secure and manage community benefit for minerals and renewables.
- Planning shouldn't be so much about trying to predict future land uses as about encouraging growth and opportunities.

.../continued overleaf

- Is it time to take some policy 'risks'? Maybe it was right to be restrictive in the boom times, but now that the economy is struggling should policy allow some more adventurous pilot projects for example?
- Need a better balance between urban and rural parts of East Lothian - don't think of rural policy as completely separate from urban.
- The role of the local authority is changing - need for more dialogue and a shared sense of purpose.

Appendix D

Online survey results

Separately bound. Please contact nick@nickwrightplanning.co.uk to obtain a copy.

East Lothian MIR Consultation Response: Renewable Energy

The East Lothian MIR indicates that any new policy related to wind turbines will reflect the current planning policy of the Local Plan and rely on the Council's existing Supplementary Guidance on Wind Turbines.

We suggest there are a number of key new aspects of the recent Scottish Planning Policy (dated June 2014, post-dating ELC's Supplementary Wind Guidance) which indicate that any new Council Planning Policy for renewables should be changed.

SPP has a highly positive emphasis on renewables as part of a sustainable development strategy for Scotland. It encourages balanced assessment of development proposals against a number of criteria, with landscape and cumulative impacts always being a key consideration and indeed one measure of sustainability.

The following extracts from the Scottish Planning Policy are worthy of note (all extracts are indented and in italics):

Outcome 2: A low carbon place – *reducing our carbon emissions and adapting to climate change.*

This outcome is one of four published Scottish Government aspirations for planning which are set out in the SPP.

*25. The Scottish Government's commitment to the concept of sustainable development is reflected in its **Purpose**. It is also reflected in the continued support for the five guiding principles set out in the UK's shared framework for sustainable development. Achieving a sustainable economy, promoting good governance and using sound science responsibly are essential to the creation and maintenance of a strong, healthy and just society capable of living within environmental limits.*

In this context the SPP talks about climate change, living within environmental limits and delivering the Scottish Government's committed targets for reducing greenhouse gas emissions through delivery of renewable power generation.

Policy Principles

This SPP introduces a presumption in favour of development that contributes to sustainable development.

This presumption was newly introduced in the 2014 SPP. For the first time, a highly positive emphasis is given to sustainable aspects of development.

Development Management

32. The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Proposals that accord with up-to-date plans should be considered acceptable in principle and consideration should focus on the detailed matters arising. For proposals that do not accord with up-to-date development plans, the primacy of the plan is maintained and this SPP and **the presumption in favour of development that contributes to sustainable development will be material considerations.** [emphasis added]

33. Where relevant policies in a development plan are out-of-date or the plan does not contain policies relevant to the proposal, then the presumption in favour of development that contributes to sustainable development will be a **significant** material consideration. . [emphasis added] Decision-makers should also take into account any adverse impacts which would significantly and demonstrably outweigh the benefits when assessed against the wider policies in this SPP. The same principle should be applied where a development plan is more than five years old.

Resource Efficient

45. This is development that re-uses or shares existing resources, **maximises efficiency** of the use of resources through natural or technological means and prevents future resource depletion, for example by mitigating and adapting to climate change. [emphasis added] This can mean denser development that shares infrastructure and amenity with adjacent sites. It could include siting development to take shelter from the prevailing wind; or orientating it to maximise solar gain. It could also include ensuring development can withstand more extreme weather, including prolonged wet or dry periods, by working with natural environmental processes such as using landscaping and natural shading to cool spaces in built areas during hotter periods and using sustainable drainage systems to conserve and enhance natural features whilst reducing the risk of flooding. It can include using durable materials for building and landscaping as well as low carbon technologies that manage heat and waste efficiently.

153. Terrestrial and marine planning facilitate development of renewable energy technologies, link generation with consumers and guide new infrastructure to appropriate locations. **Efficient supply** of low carbon and low cost heat and generation of heat and electricity from renewable energy sources are **vital** to reducing greenhouse gas emissions and can **create significant opportunities for communities.** [emphases added] Renewable energy also presents a significant opportunity for associated development, investment and growth of the supply chain, particularly for ports and harbours identified in the National Renewables Infrastructure Plan. Communities can also gain new opportunities from increased local ownership and associated benefits.

Policy Principles

154. The planning system should:

- support the transformational change to a low carbon economy, consistent with national objectives and targets, including deriving:

- 30% of overall energy demand from renewable sources by 2020;
- 11% of heat demand from renewable sources by 2020; and
- the equivalent of 100% of electricity demand from renewable sources by 2020;
- support the development of a diverse range of electricity generation from renewable energy technologies – including the expansion of renewable energy generation capacity – and the development of heat networks;

Development Planning

155. Development plans should seek to ensure an area's **full potential for electricity and heat from renewable sources is achieved, in line with national climate change targets, giving due regard to relevant environmental, community and cumulative impact considerations.**
[emphasis added]

The SPP therefore places strong emphasis on **efficiency** in terms of renewable generation and wind capture.

This is not reflected in the existing East Lothian wind energy guidance. Instead, in its desire to secure the perfect 'landscape fit' for wind development, the guidance does not deliver a balanced approach to sustainable development nor the efficient generation of renewable energy with significant levels of excellent wind resource left 'un-captured'. This runs counter to the requirement in SPP paragraph 155 to maximise an area's full potential subject for renewable power generation subject to relevant other considerations.

Turbine Typology

We would challenge existing Council guidance detailed in Clause 6.5 relating to a typology of turbines which is derived from the Supplementary Landscape Capacity Study in 2011.

We do not believe this is 'industry standard' or, to our knowledge, used elsewhere. We believe it is outdated, unrepresentative of turbines being sold, and focuses on landscape design with inadequate knowledge of the wind industry. For example, there are almost no turbines installed in the UK under 20m (Typology D).

The typology currently used in Section 6.5 of the guidance is:

- Typology A - turbines between 65 metres and less than 120 metres high
- Typology B - turbines between 43 metres and less than 65 metres high
- Typology C - turbines between 20 metres and less than 43 metres high
- Typology D - small wind turbines between 12 metres and less than 20 metres high

We suggest this typology of turbines should be revised in response to current circumstances. The most common tip heights for wind turbines in the UK market are:

- Small: 23-25m
- Small-medium: 30-35m

- Medium: 35-45m
- Medium-large: 70-80m
- Large: 100m+

We would therefore recommend the typology should be amended as follows:

- Typology A - turbines between 50 metres and less than 120 metres high (this could reasonably be split into 2 categories either side of a tip height of 75m although, it could be argued, turbines at this scale are largely unsuitable to Lowland East Lothian and therefore a broader category is appropriate)
- Typology B - turbines between 35 metres and less than 50 metres high
- Typology C - turbines between 25 metres and less than 35 metres high
- Typology D - small wind turbines less than 25 metres high

We trust these comments are of use in updating the Council's policy stance for renewable power generation in the forthcoming Proposed Plan.

Realise Renewables

February 2015

CONSULTATION RESPONSE TO MIR QUESTION 24: MINERALS, INCLUDING AGGREGATES & COAL

Table 33: Minerals, Including Aggregates & Coal	
Preferred Approach	<p>In relation to minerals, aggregates and coal, the preferred approach is as follows:</p> <p>Spatial Strategy approach:</p> <ul style="list-style-type: none"> • Do not identify an area of search for open cast coal extraction; • Approval of planning permission for an extension of Longyester sand and gravel quarry has increased associated reserves in East Lothian so no further action proposed other than to identify consented area and delete existing area of search for sand and gravel extraction; • Hardrock can be met from existing operational and non-operational quarries so no further action proposed other than to safeguard these existing extraction areas. <p>Policy approach:</p> <ul style="list-style-type: none"> • Develop policy to manage proposals for the extraction of shale gas or oil; • Clarify the role of restoration bonds / guarantees in relation to proposals for mineral workings.
Reasonable Alternative	<p>In relation to minerals, aggregates and coal, the alternative approach is as above, but in relation to an area of search for open cast coal:</p> <ul style="list-style-type: none"> • An Area of Search may be identified south of the A6093 due to proximity to the trunk road network. However, it is not clear if a potential area of search there is underlain by deposits which are of sufficient scale or quantity to be of commercial interest or if extraction could be carried out in a way which would be acceptable. Features in this area, including individual houses, would be protected by criteria based policy. Based on the constraints mapping described above this is one of the areas not directly covered by the constraints listed. However, notwithstanding this, it remains the Council’s view that any open cast operation in any of these areas is likely to have unacceptable impacts.

Question 24: Minerals, Including Aggregates & Coal

In terms of the approach to minerals, do you support the preferred approach, the reasonable alternative, or neither?

Please explain your answer. If you support neither of the above options, what alternatives do you suggest?

Winton Estate Consultation Response to MIR Question 24: Minerals, Including Aggregates & Coal

The **ELC LDP MIR Monitoring Statement 2014** is intended to provide an evidence base for the Main Issues Report. Paragraph 69 acknowledges that: *“East Lothian has a variety of minerals of varying quality, reflecting its geological history. Their extraction is important to support development, and although recycled materials are available for some uses, such as aggregate for roads, extraction remains the only possible source for other uses. East Lothian has deposits including sand and gravel deposits as well as building stone, rock aggregates (hardrock), limestone and coal”*. Figure 40 provides a plan showing the location of potential mineral resources within East Lothian.

Paragraph 70 acknowledges Longyester as a sand and gravel quarry where a planning permission has been approved for an extension to these workings. In addition a further sand and gravel quarry is identified at Skateraw.

The Monitoring Statement fails to make any comment with respect to the demand for sand and gravel within East Lothian or the wider SESplan area or as to the sufficiency of the sand and gravel landbank for either of these areas.

The **ELC LDP MIR Interim Environmental Report 2014** assesses the options identified in the Main Issues Report. The IER sets out Strategic Environmental Assessment [SEA] objectives and sub objectives in Table A. With respect to Material Assets, the SEA Objective is to: *“Manage, maintain or promote the efficient, effective or appropriate use of material assets”*, the SEA Sub Objective with specific reference to minerals being: *“safeguard mineral resources, the extraction of which would be acceptable in policy terms, from permanent sterilisation”*.

With reference to these SEA Objectives, Table B provides a summary of the key environmental issues likely to be faced in East Lothian as relevant to the emerging LDP. With respect to Material Assets, and specifically minerals, Table B identifies the issues as: *“to recognise that potential mineral reserves in East Lothian, particularly coal that could be extracted by opencast means, often occur in populated areas set within an open, attractive landscape where the intervisibility and proximity of workings and settlements would be a significant landscape and visual impact and amenity issue”*.

Table C then identifies key potential changes to the environmental baseline for each of the SEA Objectives if the local development plan were not prepared. For Material Assets, the evolution of baseline without the LDP is stated as: *“Opportunities to manage, maintain or promote the efficient, effective or appropriate use of material assets would be reduced. Such assets include land, buildings and infrastructure, minerals and aggregates, and the ability to make provision for the appropriate treatment of waste”*.

In relation to sand and gravel it should be noted that, with the exception of safeguarding the two areas that already have planning permission to extract sand and gravel and, where appropriate, safeguarding other potential resources from sterilisation through alternative development, the MIR makes no provision whatsoever to maintain or promote the efficient, effective or appropriate use of East Lothian’s sand and gravel resource.

The Interim SEA Findings refer to the Preferred and Alternative Spatial Strategy Approaches respectively as the as the ‘compact’ and ‘dispersed’ approaches. In summary the report finds that: *“The main differences between the two spatial strategy approaches is that with a compact spatial strategy there is the opportunity to secure more significant positive environmental effects for certain SEA Objectives and reduced environmental effect on other SEA Objectives”*.

With respect to Minerals, Including Aggregates & Coal the IER states: *“The preferred approach is predicted to have a positive effect on SEA Objective on material assets, an uncertain effect on biodiversity, a neutral effect on population, health, water, air, climate and heritage, and a negative effect on soil and landscape. The reasonable alternative policy approach suggests the inclusion of a potential area of search for open cast coal working. It is predicted to have similar effects to the preferred approach, but there is predicted to be a very positive effect instead of positive effect on material assets, a negative instead of neutral effect on population and climate, and a very negative effect instead of negative effect on landscape”.*

The IER fails to acknowledge that there will be a need for further minerals development, most specifically sand and gravel. Consequently, the IER fails to undertake proper assessment of the actual environmental effects of the minerals development that is likely to be required over the plan period.

The **ELC LDP Main Issues Report 2014** identifies stated aims and objectives which include ensuring adequate infrastructure capacity and an appropriate use of resources.

Paragraph 5.84 notes: *“minerals can only be worked where they are found and East Lothian has deposits of sand and gravel, coal, hard rock and aggregates in its countryside. These types of proposal are assessed against criteria based policies, the review of which has raised no major issues.”*

Paragraph 7.1 states: *“The LDP and / or Supplementary Guidance must set a policy framework against which all applications for planning permission, whether on allocated sites or not, will be assessed. The current local plan has a range of planning policies covering matters such a biodiversity and natural heritage, the built and historic environment, retailing, minerals, energy and the planning requirements on development sites. These policies have been reviewed internally and in consultation with others, including SNH, SEPA and Historic Scotland for continued relevance and to establish if any change to them may be justified, taking account of updated national and regional planning strategy and policy (NPF3, SPP and SESplan)”.*

Paragraph 7.2 states: *“The review has found that the principles behind the majority of the current local plan policies remain relevant. They have been used in assessing and determining planning applications and have proved to be robust. For example, there are very few instances of policies being overturned at planning appeal. However, that is not to say that there is no need to review them for continued relevance and robustness. Changes in national and regional planning strategy and policy indicate that in some circumstances there may be some scope for the MIR to consult on potential amendments. Examples of this include consideration of the policy approach to developer contributions, affordable housing, energy, minerals and waste”.*

Paragraph 7.42 states: *“SPP requires Development Plans to identify, review and safeguard areas of search for mineral extraction. Planning authorities are also to ensure a minimum 10 year landbank of permitted reserves for construction aggregates. The SDP requires the LDP to identify areas of search for mineral extraction, including aggregates and coal. This review has been undertaken at SESplan level in so far as the available landbank is concerned. It also requires mineral resources to be safeguarded where appropriate and use of secondary / recycled aggregates to be encouraged”.*

Paragraph 7.43 states: *“The current position is as follows. There may be a shortage of sand and gravel in terms of maintaining a 10 year landbank in the SESplan area. Longyester sand and gravel quarry in East Lothian has reserves estimated to be sufficient for one year, and an application for its extension has been approved. The LDP will safeguard this extension area as an area of search for future sand and gravel extraction in East Lothian. It will also safeguard Skateraw sand and gravel*

quarry. There is no shortage of hardrock as the landbank in the SESplan area is greater than 10 years. In East Lothian, Bangley hard rock quarry is currently inactive, but has a reserve of around 14 years remaining, as does Markle Mains hard rock quarry which is active. A Limestone quarry is active at Oxwellmains providing raw materials for cement manufacture and the LDP should safeguard the resource and provide for its working”.

Paragraph 7.44 states: *“The sustainable restoration / after care of any extraction site to beneficial use must be secured and guaranteed. The LDP will take in to account any further Scottish Government guidance on this matter. The impacts of any extraction on communities, the environment and the built and natural heritage must be minimised and mitigated. The SDP requires the LDP to:*

- *Safeguard minerals from sterilisation where the deposits are of a sufficient scale or quality to be of potential commercial interest and their extraction is technically feasible and may be carried out in a way that is environmentally and socially acceptable;*
- *Identify areas of search for aggregate minerals and coal, or, where appropriate, specific sites, having regard to national guidance and other environmental objectives of the SDP”.*

Paragraphs 7.42 and 7.44 acknowledge the LDP’s obligations with respect to complying with SPP and the LDP policy. However, with regards to areas of search, whilst the MIR has produced a statement with respect to opencast coal, the report has completely failed to comply with this requirement in relation to aggregates and specifically sand and gravel. Whilst para 7.43 makes reference to safeguarding the areas at Longyester and Skateraw as areas of search for future sand and gravel, as planning permission has been already granted for these sites, these consented reserves are clearly part of the existing landbank and cannot be regarded as a future area of search.

Similarly, the MIR completely fails to consider the obligation to maintain a 10 year landbank of aggregates at SESplan level. The statement at Para 7.43 that: *“There may be a shortage of sand and gravel”* is an obvious understatement. The SESplan Minerals Technical Note Nov 2011, which is referenced within the MIR, placed the landbank at 4.5 years at the end of 2010. Allowing for additions to the landbank since the date of the SESplan survey, and consumption over that period, the sand and gravel landbank is currently in the region of 1.7 years which demonstrates a very significant deficit. The MIR, and associated documents, provide no assessment of the current/future demand for sand and gravel within East Lothian and no assessment of how a 10 year landbank will be maintained and rolled forward over the 10 year life of the plan. Similarly, the MIR provides no detail on how East Lothian will seek to contribute towards addressing the current deficit in the 10 year sand and gravel landbank deficit within the SESplan area or to the maintenance of this landbank over the plan period.

In conclusion the ‘Preferred Approach’ is not supported because it does not comply with SPP or SDP policy with respect to both the identification of areas of search for sand and gravel or in relation to recognising the need to make provision for and maintain a 10 year landbank. Apart from failing to comply with overarching guidance, the current proposal fails to make any provision for the possibility of future aggregate development and, as a consequence, any future application for mineral extraction would effectively be contrary to the development plan.

Whilst the ‘Reasonable Alternative’ makes provision for a limited area of search for opencast coal, it fails to address the issues raised in respect of the ‘Preferred Approach’ and therefore cannot be supported as a direct alternative.

As neither option is supported we would suggest the following three options as reasonable potential alternatives:

- Option 1 As there is an extensive range to the geographic location of economically viable mineral resources within East Lothian the whole area should be treated as an “Area of Search”. Within this search area there will obviously be areas that are unsuitable for minerals development due to environmental/amenity sensitivities, these areas being effectively protected by existing legislation and policy. This is an approach that has been successfully utilised in other areas, for example South Lanarkshire.
- Option 2 Figure 40 of the ELC LDP MIR Monitoring Statement 2014 provides a plan showing the location of potential mineral resources within East Lothian. These could be considered as an area of search, although it should be acknowledged that BGS mapping is not absolute and that viable deposits may be present outwith these areas. Again, within this search area there will be areas that are unsuitable for minerals development due to environmental/amenity sensitivities, these areas being effectively protected by existing legislation and policy.
- Option 3 ELC undertakes consultation with interested parties to establish potential areas of search for inclusion in the LDP.

As the submission of planning applications for minerals development will be subject to market demand as perceived by individual operators, East Lothian Council cannot guarantee an ongoing contribution of planning permissions to supplement the aggregates landbank. However, by providing reasonable areas of search, ELC would be seen to meet current SPP and SDP policy by facilitating the development of aggregate sites wherever these proved to meet acceptable environmental/amenity standards.

Amendments to Minerals Policy

The changes required to ensure LDP compliance with SPP and SDP policy would also require revision of the existing minerals policies.

In this respect Policy MIN2 should refer to Areas of Search with the specific reference to Longyester deleted.

Policy MIN4 should be amended as follows:

- Delete Policy 1(a) – This policy restricts the potential for new operators to enter the market even if there is a demonstrated need for additional mineral reserves, as is the current case for sand and gravel.
- Delete the reference to Longyester in Policy 1(b) as this is a permitted area, not an area of search.

Representation of Specific Areas of Search for Aggregates for Inclusion in LDP

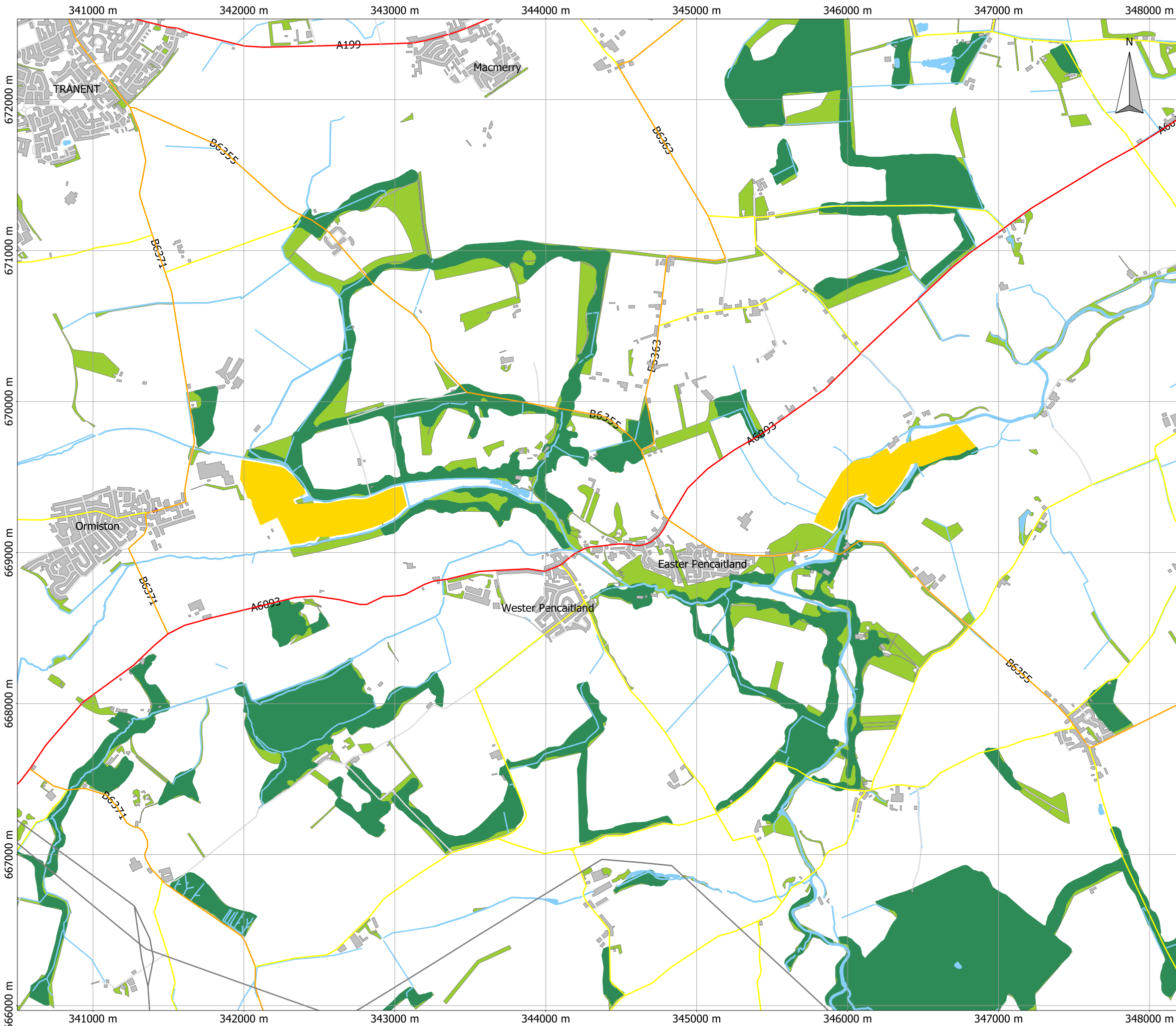
With specific reference to option 3, Winton Estate seeks to promote the areas identified on attached plan Figure WE1, Areas of Search for Sand and Gravel Extraction. These areas are identified as potential mineral resources on the aforementioned Figure 40 and have been subject to site investigation which has confirmed the presence of sand and gravel. A basic scoping assessment has been undertaken with respect to potential environmental and amenity issues the conclusion of which was that, with appropriate design, operations could be undertaken to a standard that would meet current societal standards.

It is noted that the IER considers potential changes to the environmental baseline. In respect of the proposed operations at Winton Estate, these have been considered in conjunction with other longer-term estate aspirations. The proposals are considered to enable future development which would enhance the landscape, provide flood attenuation and have positive impacts on biodiversity, flora and fauna as set out below.

The development of key areas for sand and gravel would incorporate a reinstatement design creating landscaped waterbodies offering significant possibilities for recreation including enhanced country walks, wildlife and ornithological interest, fishing and other water based activities. The reinstated landscape would provide an attractive tourist setting which would be a key enabler in relation to the proposals to establish self-catering accommodation.

The areas identified for potential sand and gravel are located in close proximity to the Tyne Water, Puddle Burn and Bellyford Burn all of which are susceptible to flooding. The excavation of sand and gravel in proximity to these watercourses could provide overflow catchments which would contribute to flood alleviation in the immediate area and further downstream.

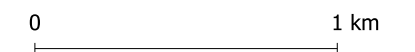
In general, the creation of water bodies with sinuous edges and reed-beds would provide potential nesting and foraging habitat for a number of species including otters, water voles, insects [locally rare or scarce dragonflies and damselflies], ducks and waders such as Lapwing. A range of depths around the edges would allow a variety of flora to thrive, providing structural variety to the created habitat. The creation of islands, either through landform or rafts, would provide potential nesting habitat for ducks, waders and terns free from mammalian predators. An element of bare ground with a mix of cobbles would provide habitat diversity as well as nesting habitat for a number of bird species.



AREAS OF SEARCH SAND AND GRAVEL

Legend

 Areas of Search



Client: WINTON ESTATE

Project: ELC MIR

Title: AREAS OF SEARCH

Figure: WE1 Drawn: RML

Scale: 1:25,000 Checked: WB

Date: 03/02/2015 Sheet Size: A3

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