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Additional information:

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

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

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Proposed East Lothian Local Development Plan Schedule 4 Representation Responses

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

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

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

For further information or advice, please contact:

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

Submitted to **East Lothian Proposed Local Development Plan - Draft Environmental Report**
Submitted on 2016-10-15 09:06:49

About You

What is your name?

First name:

Gail

Surname:

Hardy

What is your email address?

Email:

[REDACTED]

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

Local resident / member of the public

What is your organisation and role (if applicable)?

Organisation:

Your role:

Please enter your postcode

Postcode:

[REDACTED]

In the interests of transparency we will publish responses to this consultation. We will not publish personal email addresses. If you believe your intended response may contain sensitive or confidential information you should contact us to discuss this.

I consent to my response being published, including my name

Section 3. Current state of the environment

Do you think this section of the Draft Environmental Report provides sufficient and appropriate information on the current state of the environment in East Lothian?

No

changes box:

I do think that the plan is not sufficiently structured to take into account the support services that would need to be in place to serve the proposed expansion.

Key services, including education, transport and health services are already at capacity and any expansion needs to be predicated on a more robust examination of those services- including a full user consultation with those already using them, rather than just a look at the numerical indicators provided by the council.

Other comments box:

Section 5.2: Development Locations

Do you think that the strategic environmental assessment of the proposed approach is appropriate? (Q6)

Not Answered

changes box:

As a Gullane resident, I am hugely concerned about the zoning that is being proposed in East Lothian over the next 20 years.

in particular the combination of all four proposed sites - the Fire College, the Saltcoats area, Fenton Gait and Fenton Gait South would deliver a cumulative burden on resources and infrastructure in the immediate vicinity.

This infrastructure is simply not there.

With changes to the local GP surgery, reduction of the bus services (which were almost lost entirely), and with a proposal for only 2 more classrooms to meet the addition demand for school places, this proposal has not been properly structured.

Why, for example, is the Fire College not being prioritised, rather than new building areas?

Gullane bears more than 50% of the burden of new sites in the North Berwick Coastal area, and as a small community, it is simply not equipped to cope with this kind of expansion.

comments box:

Section 5.2: Development in the Countryside & on the Coast

Do you think that the strategic environmental assessment of the proposed approach is appropriate? (Q20)

Not Answered

changes box:

As a Gullane resident, I am hugely concerned about the zoning that is being proposed in East Lothian over the next 20 years.

in particular the combination of all four proposed sites - the Fire College, the Saltcoats area, Fenton Gait and Fenton Gait South would deliver a cumulative burden on resources and infrastructure in the immediate vicinity.

This infrastructure is simply not there.

With changes to the local GP surgery, reduction of the bus services (which were almost lost entirely), and with a proposal for only 2 more classrooms to meet the addition demand for school places, this proposal has not been properly structured.

Why, for example, is the Fire College not being prioritised, rather than new building?

Gullane bears more than 50% of the burden of new sites in the North Berwick Coastal area, and as a small community, it is simply not equipped to cope with this kind of expansion.

comments box:

Submitted to **East Lothian Proposed Local Development Plan - Draft Development Briefs**

Submitted on **2016-10-30 11:32:21**

Introduction

What is your name?

Enter your name.:

Linda Kelly

What are your contact details?

Email:

[REDACTED]

Postal address:

[REDACTED]

[REDACTED]

[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:

TT12

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 :

Woodhall Road, Pencaitland

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.

TT12 Woodhall Road, Pencaitland

TT12 Woodhall Road, Pencaitland

What modifications do you wish to see made to the Development Brief TT12 Woodhall Road, Pencaitland

Modifications sought to TT12 Woodhall Road, Pencaitland :

As a resident I don't want to see this proposal go ahead at all.

Upload map relative to TT12:

No file was uploaded

Please give reasons for your suggested change.

Reasons for changes TT12 Woodhall Road, Pencaitland :

Reasons for objection of the proposal:

1. The back of our house would be overlooked by the development. We have not been advised of the style of the housing and the projectory on which they would face.
2. We would experience loss of light to our garden in the afternoon. This would be detrimental to our lives as we spend a lot of time in our garden. We also have a 98 year old neighbour whose garden is her lifeline. She is not as able to get out and about as she once was so this is her only real pleasure.
3. Increased noise and dust. We are in a cul-de-sac which means all cars have to pass our house to enter and exit the scheme. Sitting in our back garden provides us with a welcome break from this noise.
3. Increased traffic. The road leading to the proposed development is steep and runs alongside many pensioner houses. Currently it is local residents that actually grit the hill in the winter as we have been told by a member of East Lothian Council that this road is not a priority as it is a B road.
4. Our street is already pushed to the limits with relation to parking. Would there be additional parking provided at the rear the of our property to accommodate present residents cars as well?
5. The park at the end of the street is barely suitable for the children who reside in the street at present. Many of the children actually resort to playing on the road instead. We have a sign at the beginning of the street to alert drivers of the children playing - this very rarely has any impact and the cars still come down the hill at speed.
6. The entrance to the proposed development would just increase this risk.
7. The footpaths are a disgrace ! These are never normally gritted either - again many of the residents clear and grit them especially for the older residents in the street. We did have our road re-laid a number of years ago and to my knowledge the top coat was never applied.
8. We had thought about extending our property to the rear in the not too distant future. My feeling is that we would not receive planning permission due to the outlook from the new houses. Would that be the case?
9. The road at Lempockwells Road is awful to drive on - the surface of the road is full of holes. The increased cars parking on this road makes it difficult for two way traffic. Building site lorries would only increase this hazard.
10. When these houses are allocated does East Lothian Council consider who the best resident would be for the area? We have been in our house for nearly 10 years and No. 23, across the road from us has had 4 tenants in it!! One of those tenants was witnessed running along the street with a knife trying to stab her boyfriend. Having been brought up in the village, I did not expect to have to protect our children from these scenes.
11. Having spoken with the land owner, he assures me that he is not aware of this development site, no one has approached him to purchase the land. Other local residents on the same street were also not aware of these plans. To my knowledge only one side of the street received the notice. Therefore I feel that this has given unfair representations of residents comments.

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

Submitted to **East Lothian Proposed Local Development Plan - Draft Development Briefs**

Submitted on **2016-11-05 22:12:27**

Introduction

What is your name?

Enter your name.:

Loreen Pardoe

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 have a clear concern re additional building around villages of East Lothian, so significantly affecting village life where residents have chosen to sacrifice certain amenities and options in favour of a more rural and associated links to a particular way of life for themselves and their families.

Adding more housing affects that dynamic clearly, changes infrastructure, schooling in many regards and the intrinsic feel of a village and small community. With criticism of previous building splurges of 80s and early 90s it is clear that not all developments were sympathetic or in keeping with village life.

Where larger communities already exist, expansion does not create the same universal change, can be linked to better amenities and resources so have an intrinsic appeal to new residents which is not the same as 'overspill' type of thinking with less interest or respect for communities as has been discussed before. I feel this is the better focus, keeping the balance within East Lothian, more of it's heritage and identity and safeguarding green and open spaces.

I also think the concept of what relates to 'affordable housing' should be more realistically defined and in line with local first time buyers and those on lower salary incomes where larger communities can offer relevant supports, amenities and transportation.

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.

I do not wish to comment on a specific brief

Submitted to **East Lothian Proposed Local Development Plan - Draft Development Briefs**
Submitted on **2016-09-19 11:40:20**

Introduction

What is your name?

Enter your name.:
Neil Murray

What are your contact details?

Email:
[REDACTED]

Postal address:
[REDACTED]
[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:
[REDACTED]

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 :

MH8 Levenhall - After having spoken to residents of [REDACTED] the vast majority are against this development for a number of reasons. Our green belt area would disappear, we would have 1 - 2 years of noise and dust pollution plus vibrations from the building site. This would lead to the resident wildlife moving from the area (to where I don't know, as there seems to be copious housebuilding just up the road!). We have families of deer and foxes in that area, not to mention the many wild birds who will lose their environment. I will be contacting Councillors, the RSPCA, the RSPB and my MP regarding this development. I am very much against it.

Regards, Neil.

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.

MH8 Levenhall, Musselburgh

MH8 Levenhall, Musselburgh

What modifications do you wish to see made to the Development Brief for MH8 Levenhall, Musselburgh?

Modifications to MH8 Levenhall:

It not to go ahead.

upload map relative to MH8:

No file was uploaded

Please give reasons for your suggested change.

Reasons MH8 Levenhall :

Reasons given in my previous comments.

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

Submitted to **East Lothian Proposed Local Development Plan - Draft Environmental Report**
Submitted on 2016-11-06 21:43:01

About You

What is your name?

First name:

Tony

Surname:

Thomas

What is your email address?

Email:

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

Developer / agent / landowner

What is your organisation and role (if applicable)?

Organisation:

apt planning & development ltd.

Your role:

Director

Please enter your postcode

Postcode:

EH40 3AB

In the interests of transparency we will publish responses to this consultation. We will not publish personal email addresses. If you believe your intended response may contain sensitive or confidential information you should contact us to discuss this.

I consent to my response being published, including my name

Section 8. Site Assessments (Appendices 5-10)

Do you have any comments to make on the detailed site assessments contained in Appendices 5-10? Please quote the relevant site reference number(s).

comments box:

Delete Whitekirk Burial Provision (ref: MIR/ NK/OTH024)

The proposal to provide an extension to the Whitekirk Cemetery has been based on incorrect land ownership information and the assumption that this land would be gifted to East Lothian Council.

The land is in private ownership and is not the piece of land that ELC thought would be available, at no cost for the expansion land. The proposed land is not suitable for a new cemetery site as it has no safe access, would be totally out of character with the remainder of the field which it currently forms part of.

Consequently this proposal should be deleted from the Environmental Report.

Musselburgh area upload:

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Prestonpans file upload:

No file was uploaded

Tranent file upload:

No file was uploaded

Haddington file upload:

No file was uploaded

Dunbar file upload:

04b - Proposed LDP - Environmental Report - Appendix 9 - Dunbar.pdf was uploaded

N Berwick file upload:

No file was uploaded

Submitted to East Lothian Proposed Local Development Plan
Submitted on 2016-11-07 16:20:20

About You

1 What is your name?

First name:
Mark

Surname:
Holling

2 What is your email address?

Email address:
[REDACTED]

3 Postal Address

Address:
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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?

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::

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 - 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:

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):

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:

Land must be secured to allow safe access for pedestrians and cyclists out of this development on to the Heugh hopefully to link behind the Lochbridge Road development so as to give safe access to schools, the Law, the Sports Centre and any other community buildings in the Mains Farm development. The housing must not be a dead end for pedestrians/cyclists although it is best if it is thus for cars.

i'm not sure building up the hill preserves the landscape value of the eastern approach to N Berwick with its coastal views and up to the Law. Houses above the level of Tesco (which is bad enough) would disrupt this and I don't feel should be allowed here!

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:

Land must be secured to allow safe access for pedestrians and cyclists out of this development on to routes and safe access to schools, the Law, the Sports Centre and any other community buildings in the Mains Farm development. The housing must not be a dead end for pedestrians/cyclists although it is best if it is thus for cars. A bridge over or a tunnel under the railway may be required here so that a safe and attractive pedestrian/cyclist route can be constructed into the Gilsland area developments where there are good safe links to the schools already.

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 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:

I believe it could solve many problems of transport within North Berwick if a new station and Park & Ride facility were to be built at Ferrygate.

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 car park at NB station is too small for purpose but without a modal shift to bike or bus there will continue to be a large demand for space. There is no room at the current station. A new one on the west of the town would allow visitors to the town to park there and take trains (and buses) into town, would give parking for Edinburgh bound people from the west side of town, and provide infrastructure for a bridge to the south side of the railway so that pedestrians and cyclists could have a safe route to facilities on the south side. there is no simple current route which avoids the bottlenecks of Law Road or Ware Road.

There must be opportunities to adjust train times to allow this development which could be key to freeing up space for PEOPLE (not cars) in the centre of North Berwick.

I made this suggestion to the Community Council in the past but have not seen any progress.

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):

Our Ref B53576ld0048004

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Conference Square
Edinburgh EH3 6AN

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07 November 2016

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

Dear Sir/Madam

**TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997 AS AMENDED
EAST LOTHIAN PROPOSED LOCAL DEVELOPMENT PLAN
LAND AT LETHAM MAINS HADDINGTON**

I refer to the above and the consultation for the proposed local development plan.

On behalf of Taylor Wimpey UK Ltd and Mactaggart & Mickel Homes Ltd we enclose two representations to the consultation.

I would welcome confirmation of receipt of the representations in due course.

Yours faithfully

[REDACTED]
Andrew McNab MRTPI MRICS
ASSOCIATE DIRECTOR
PLANNING

Enc

Cc [REDACTED] Taylor Wimpey UK Ltd
[REDACTED] Mactaggart & Mickel Homes Ltd

**COLLIERS INTERNATIONAL SPECIALIST AND CONSULTING UK
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Date Approved	7/11/16





Letham Mains, Haddington (Site HN2)

RESPONSE TO EAST LoTHIAN COUNCIL'S PROPOSED LOCAL
DEVELOPMENT PLAN

NOVEMBER 2016

PREPARED BY

COLLIERS INTERNATIONAL

PREPARED FOR

MACTAGGART & MICKEL HOMES
LTD/TAYLOR WIMPEY UK LTD

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SUMMARY

This response to East Lothian Council's proposed Local Development Plan (pLDP) consultation is prepared by Colliers International on behalf of our Clients, Mactaggart & Mickel Homes Ltd and Taylor Wimpey UK Land. It provides comment on aspects of the proposed Plan which our Clients consider require further amendments, and supports their land interests in the Haddington area.

While, in accordance with Planning Circular 06/2013: Development Planning, the proposed Plan represents the Council's settled position on matters, we strongly urge the Council to consider the conclusions of this report and make appropriate amendments to the plan.

1 INTRODUCTION

1.1 CLIENTS

Colliers International have been instructed by our Clients, Mactaggart & Mickel Homes Ltd and Taylor Wimpey UK Ltd, to make formal consultation responses to East Lothian Council's proposed Local Development Plan 2016.

1.2 LAND INTERESTS

Our Clients have engaged with the Development Plan process at Main Issues Report stage, promoting two sites within the Haddington cluster – Letham Mains expansion area and land to the north-west of Letham House, south of the A199 and B7641. Land at Letham Mains has successfully secured an allocation within the proposed Plan as HN2, and this is welcomed. Their other specific land interest in Haddington however has failed to be included as land suitable for development in the proposed Plan. Our Clients remain supportive of this site and continue to highlight its development potential in assisting Haddington in meeting its residential development land requirements over the forthcoming Plan period. A separate response for the non-allocated site has been prepared and submitted to East Lothian Council.

2 CONTEXT

2.1 LAND AT LETHAM MAINS

Land at Letham Mains, adjacent to that expansion area currently allocated in the adopted Plan and where planning applications remain pending, is included in the proposed Plan as HN2. The original allocated site, HN1, is protected in the proposed Plan through PROP HN1 whereby: *"Land at Letham Mains is allocated for a mixed use development of circa 800 homes plus education and community facilities, a local centre and infrastructure and associated works. The Council is minded to grant planning permission for this development and an associated masterplan, to which any associated detailed proposal for the allocated land must conform. Any new proposals for the allocated site must conform to the adopted Development Framework for it and include a comprehensive masterplan for the entire allocated site that integrates development with the surroundings. Any development here is subject to the mitigation of any development related impacts, including on a proportionate basis for any cumulative impacts with other proposals including on the transport network and on education and community facilities as appropriate."*

PROP HN2 is included in the proposed Plan as: *"PROP HN2: Letham Mains Expansion, Haddington Land at Letham Mains 'South West Field' is allocated for a development of circa 275 homes. A masterplan for the entire site will be required as part of any planning application, which must complement and not undermine the adjacent original Letham Mains allocation (PROP HN1) as well as conform to the relevant Development Brief. Any development here is subject to the mitigation of any development related impacts, including on a proportionate basis for any cumulative impacts with other proposals including on the transport network and on education and community facilities as appropriate."*

In responding to the MIR the project team prepared a Development Framework document to set out why and how the site could be developed in a manner which meets the six key qualities of a successful place, as set out in Government Policy Scottish Planning Policy (SPP), Designing Places and Creating Places:

- distinctive;
- safe and pleasant;
- easy to move around;
- welcoming;
- adaptable;
- resource efficient.

The development layout responded directly the planned adjacent development, and a copy of the design concept (figure 18) and indicative development plan (figure 19) is included in Appendices 1 and 2, respectively.

The site has been successfully included in the proposed Local Development Plan, which is welcomed. Our clients fully support the inclusion of the site within the proposed plan.



3 RESPONSES

3.1 INTRODUCTION

In this section we take each of the sections of the pLDP in turn and comment as appropriate.

3.2 A SPATIAL STRATEGY FOR EAST LOTHIAN

At MIR stage our Clients responded to the consultation suggesting to the Council that the appropriate approach to the spatial strategy would be a hybrid of both the dispersed and compact growth strategy. The strategy taken forward in the proposed Plan however is a compact one. The spatial strategy presented in the pLDP is supported by Development Briefs setting out local placemaking objectives; this is supported and particular support is given for the Development Brief relating to HN2 where some of our Client's interests lie.

We support the allocations of two sites, Letham Mains and Letham Mains expansion at PROPHN1 and HN2 respectively for housing-led mixed use developments.

3.3 GROWING OUR ECONOMY & COMMUNITIES

In this section of the plan several proposed policies are outlined. We comment on those relevant to housing, its need and the development of land around Letham Mains.

The SDP requires that the LDP ensures sufficient land to deliver 6,250 homes in the period 2009-2019 and a further 3,800 homes in the period 2019 to 2024.

Policy HOU 1 'Established Housing Land' states that the council will support the principle of residential development on sites within the established housing land supply as set out in Housing Land Audit 2015. Table HOU 1 sets out the established supply which includes HN 1 Letham Mains and HN 2 Letham Mains Expansion (with a capacity for 275) as an additional LDP allocation. We support the identifications of these two sites within Table HOU 2, noting that the proposed allocation does not currently form part of the established supply as it, until the plan is adopted, remains a proposal.

Table HOU2 'Housing Land Requirements and Supply' outlines the Council's position in regards to the housing land supply against the requirements of the SDP.

The SPP requires that in addition to the housing land requirements, as set by the SDP, that Local Authorities also add a 'generosity allowance' to the housing land requirement of between 10-20%. In contrast to many other local authorities, including those within the SESPLAN SDP area, East Lothian Council do not add a

generosity allowance onto each of the housing land requirement figures for each of periods. Taking the minimum 10% 'allowance' the true figure for the East Lothian Housing requirement from 2009-2019 should be 6875 and for the period 2019-24 should be 4180. If the higher figures of 20% are utilised, then the requirement to 2019 should be 7,500 and from 2019-2024 4,560.

The chapter also contains a section on 'Maintaining an adequate Effective Five-Year Housing Land Supply'. We support the recognition that, in paragraph 3.44, *'if the supply of effective housing land is not enough for the next five years, Scottish Government planning policy would expect this plan's policies on the supply of housing land to be considered out-of-date, and a presumption in favour of development that contribute to sustainable development to be a material consideration'* as per the SPP.

Advice box 1 sets out the Council's approach to calculating the adequacy of the five-year effective housing land supply. The basis of this approach is the Housing Land Audit, annually updated conjunction with Homes for Scotland on behalf of the housebuilding industry.

Policy HOU2 refers to the maintenance of the 5-year effective housing land supply, and outlines the situations in which additional land may come forward for development, including policy 7 of the SDP when that 5-year supply is not being maintained. The policy would appear to not serve any real purpose given the statement earlier on within the plan, as the SPP states, that the housing policies of the plan are to be considered out-of-date if the 5-year supply is not being maintained. In that circumstance, then the SPP is to be applied in terms of the presumption in favour of sustainable development. It would appear that such a policy is redundant and we object to the policy's inclusion.

Paragraph 3.52 refers to affordable housing and in particular states that for Letham Mains the quota of affordable housing is to be 17%. We consider that this 17% should apply to the Letham Mains Expansion as well. This should be acknowledged within paragraph 3.52.

We support policy HOU3 'Affordable Housing Quota' subject to the plan identifying the affordable housing requirement at Letham Mains and at the Letham Mains Expansion as 17%.

We support policy HOU4 in that it recognises that a wide range of affordable housing tenure models are supported, including social rent, shared ownership and shared equity models, homes for mid-market and intermediate rent, and subsidised and unsubsidised low cost housing for market sale and self-build plots.

Prop ED5 refers to the Haddington Cluster and education. We support the principle of the developer contributions assisting to fund new education provision in the Haddington Cluster. However, it should also be noted that developer contributions should not be overly onerous so as to make development unviable.

Policy CF1 refers to the Provision of New Sports Pitches and Changing Accommodation. It requires one full size grass pitch and two team changing at Letham Mains. It also requires one seven-a-side grass playing pitch at the Letham Mains Expansion. We support this policy and proposal.

Policy OS3 & OS4 refer to Open Space Provision and play facilities within new development. Advice box 2 provides guidance on the level of each of these based upon residential unit numbers:

Number of dwellings	Open Space and Equipped Play Area Requirement	Indicative types of Open Space Provision
10-49	60 sq m per dwelling	Formal/Informal
50-159	60 sq m per dwelling Play area (s) (20-30m buffer) Possibly allotments	Formal/Informal LAP(s) (100 sq m) possibly LEAP (400 sq m) Local Park (approx. 0.2 – 0.5 hectares)
160-499	60 sq m per dwelling Play areas (20-30m buffer) Possibly allotments Possibly sports facilities Community event space Car Parking	Formal/Informal LAP(s), LEAP(s) possibly NEAP(s) (1000 sq m) Local Parks (approx. 0.2 – 0.5 hectares) Town Parks (approx. 0.5 – 1.0 hectares) Possibly civic space
500 upwards	60 sq m per dwelling Play areas (20-30m buffer) Possibly allotments Possibly sports facilities Community event space Car Parking	Formal/Informal LAP(s), LEAP(s) possibly NEAP(s) (1000 sq m) Local Parks (approx. 0.2 – 0.5 hectares) Town Parks (approx. 0.5 – 1.0 hectares) Possibly District Park Possibly civic space

We do not support this policy and consider that the 20-30m buffer for play areas excessive and will impact upon the number of houses being able to be delivered on sites, which in turn may require an increased number of sites to come forward to meet the housing requirement.

3.4 OUR INFRASTRUCTURE & RESOURCES

This section refers to transportation, digital and other networks. Policy T1 'Development Location and Accessibility'. This policy states that new developments should be capable of being accessed on foot, cycle, public transport as well as private vehicle. We support this policy.



Policy T2 refers to transport impacts and that new development should not have a significant adverse impact upon:

- Road safety
- The convenience, safety and attractiveness of walking and cycling in the surrounding area;
- Public transport operations in the surrounding area, both existing and planned, including convenience of access to these and their travel times;
- The capacity of the surrounding road network to deal with traffic unrelated to the proposed development; and
- Residential amenity as a consequence of an increase in motorised traffic.

We support this policy.

We also support policies T4 & T5 which seeks to protect the Council's existing core path, active travel network and cycle route network.

Policy DCN2 'Provision for Broadband Connectivity in New Development' proposes that development of 5 or more homes, or proposals for employment generating uses with a floor area of 100 sq m or larger, shall as part of the development make provision for deliverable opportunities for digital infrastructure to the proposed new homes or business premises, particularly provision for ducting and fibre or wiring for broadband connectivity. We support this policy.

We offer no comment on the policies relating to major transport infrastructure and energy generation.

We support policy W3 'Waste Separation and Collection' which requires new development to provide appropriate provision for waste separation and collection to meet the requirements of the Waste (Scotland) Regulations.

Policy W4 'Construction Waste' requires that site waste management plans should be submitted with all planning applications. We do not support this policy in that it appears to require waste management plans to be provided 'up front' with planning applications. We believe that this is a matter which can be dealt with by planning condition. We object to this policy therefore and suggest it should be amended to state that submission of waste management plans can be dealt with by an appropriately worded planning condition.

We offer no comment on minerals policy.

3.5 DIVERSE COUNTRYSIDE & COASTAL AREAS

We note Advice Box 5 which defines 'countryside' as those areas of land outwith settlement boundaries.

We offer no comment on any of the other policies within this chapter.

3.6 OUR NATURAL & CULTURAL HERITAGE

We offer no comment on policies relating to natural heritage as they do not affect our client's landholdings at Letham Mains.

We support Policy NH8 'Trees and Development' in that there should be a presumption in favour of retaining East Lothian's woodland resources.

We note Advice Box 7 on Sustainable Urban Drainage Systems. The relevant Policy on SUDS, NH10, is supported in that SUDS should be designed at the planning application stage and submitted with all development proposals. We welcome the commentary in paragraph 6.30 in allowing a variety of types of SUDS feature in developments.

We offer no comment on policies relating to flooding, air quality or noise as our clients landholding are not affected by potential flood risk, air quality issues or noise issues.

Neither do we offer any comment on cultural heritage matters such as Listed Buildings, Conservation Areas or Scheduled Monuments as the subject sites are unaffected by these matters.

3.7 DESIGN

We welcome the section on design and the recognition of the qualities of successful places outlined earlier and in the SPP. Our clients are committed to delivering a high quality of design in their developments.

We support Policy DP1 'Landscape Character' which requires that all new development be well integrated into its surroundings and include landscaping and open spaces. Both sites at Letham Mains are supported by Development Frameworks which demonstrate that they can be developed to a high standard of design, and in a design-led manner.

As such, policy DP2 'Design' is also supported and we note Advice Box 11 which outlines the situations in which design and access statements are required to support planning applications.

We note the principle behind the housing density policies and the need to increase density to efficiently utilise land. However, we are slightly concerned as to this being prescriptive in policy DP3 that all new developments should achieve a density of 30 units per hectare (net). Rightly the supporting text indicates that density should arise out of the design process, however topography and physical features on land may prevent higher densities being achieved. We note that in certain circumstance the policy allows design to dictate that densities maybe lower and justified through masterplans and design statements.

Policy DP4 refers to Major Development Sites which are sites greater than 50 residential units or 2Ha in size (in terms of residential). We note that this policy requires the submission of a masterplan of the entire site. In many cases this is appropriate, however in cases where multiple developers (who may be unknown) may be on a site, and multiple phases are involved that a masterplan may not be wholly suitable. On other sites with multiple phases and multiple developers involved we have successfully utilised masterplan guidance to inform the development of the site in phases. This allows flexibility for future developers to design the site as they see fit, within the parameters of design guidance. We believe that the policy should include an allowance for this approach and therefore object to the policy as it is currently worded. The policy should read 'masterplans, or masterplan guidance must be submitted prior to.....'

We support policies DP 8 'Design Standards for New Housing Areas' and DP9 'Development Briefs'.

3.8 DELIVERY

The delivery section of the plan provides the policy link between the LDP and the Action Programme as required by the SPP. We welcome the Draft Action Programme as produced by the Council. We consider however that there is limited information on development timeframes within the Draft Action Programme.

We support Policy DEL1 'Infrastructure and Facilities Provision' which requires developers to make appropriate provision for infrastructure and community facilities required as a consequence of their developments. We note that the supporting text states that developers are not required to provide more mitigation than necessary to address the impact of their development in accordance with established planning case law and practice.

4 CONCLUSIONS

On behalf of our clients we have set our representations to the East Lothian Proposed Local Development Plan, much of which we support. We would welcome the opportunity to discuss our objections in more detail with Council officers, in particular, the potential development of the OTH-H8 site and its inclusion within the plan going forward.

Should any question arise out of the representations outlined in this report please do not hesitate to contact Colliers International.

Appendices 1 - 2



1 HN2 DESIGN CONCEPT



5 Development

5.1 Design Concept

The concept for preparing an indicative framework for site PREF-H2 is shown within the attached sketch and as highlighted below:

- Ensure continuation of the masterplan principles established within the Letham Mains work done to date;
- Maximise opportunities for integration through continued orientation of buildings as appropriate and through a connected street and path structure;
- Create a permeable street network with multiple access points allowing for flexibility, and for sustainable access to the facilities proposed within Letham Mains;
- Ensure adequate protection is given to the existing properties to allow a continue sense of privacy;
- Continue the Letham Burn park south and encompass new SUDS within that;
- Design within context and be sensitive to the character of Pencaitland Road when designing the new frontage, mirroring the massing of existing buildings;
- Improve the character of Pencaitland Road by providing a new footpath cum cycleway along the edge; new tree planting, and the new roundabout will help slow traffic speeds.

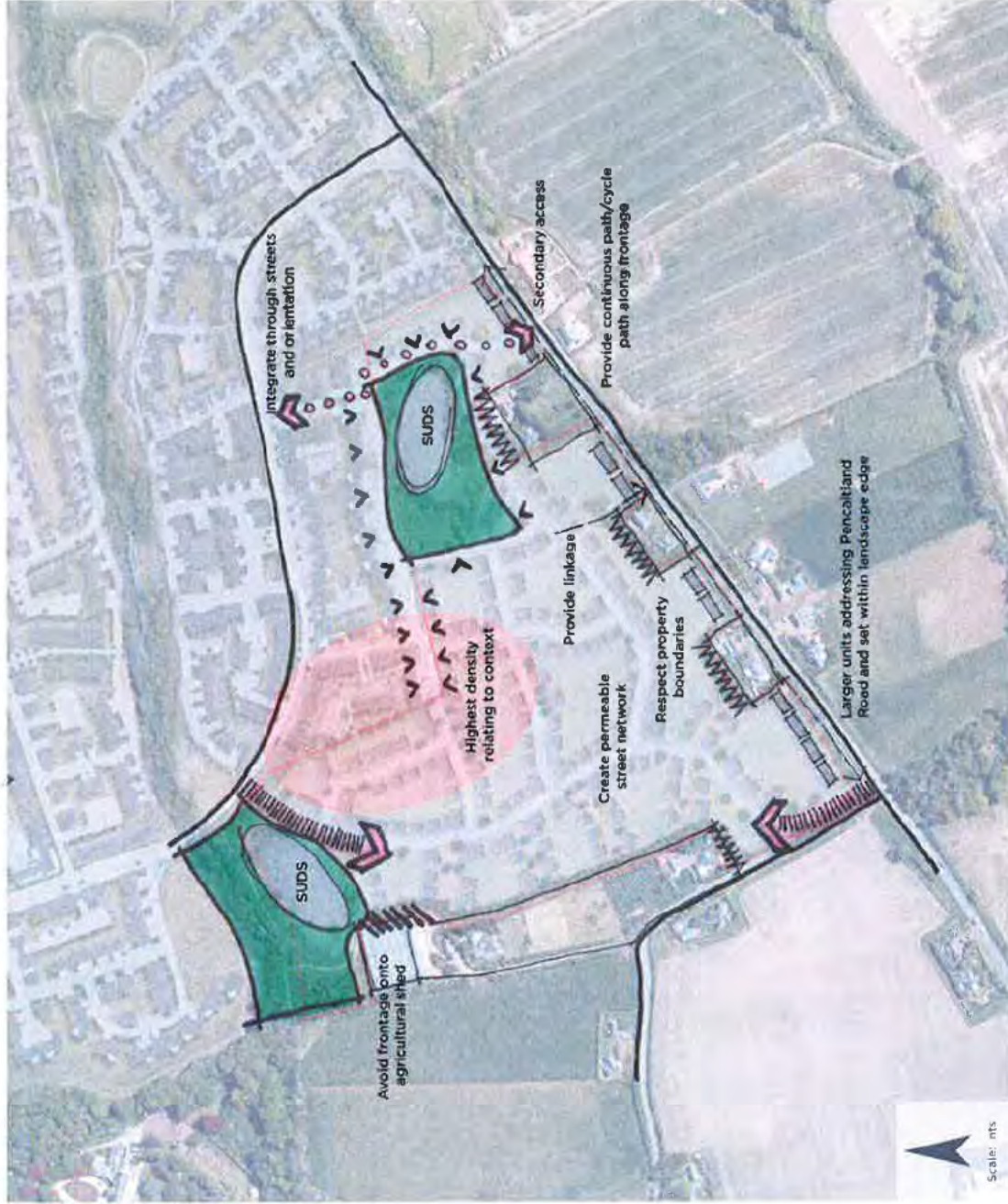


fig. 18: Design Concept

2 HN2 INDICATIVE DEVELOPMENT PLAN

5.2 Proposal

An Indicative Development Framework has been drawn up which demonstrates how the design principles applied within the Letham Mains masterplan can be continued into the expansion site to the south-west.

Two access points are proposed onto Pencaitland Road which will include minor alterations to the alignment of the access to Letham Mains smallholdings and a connection to Letham drive within the existing masterplan area, currently awaiting determination. There are further opportunities for connections to what will be existing streets and path access as appropriate. These are described within section 5.4.

This then generates the street pattern consisting of a connecting network of streets. The exception is to the western edge where turning development to orientate with side gables onto the western edge works best with the existing dwellings and far buildings. This can be enhanced through creation of small homezone areas with shared access and natural calming through building placements and street trees, and working well with the drainage strategy and the use of bio-retention.

The framework will allow a variety of house type and density but it is anticipated that the lower densities should be to the south as Pencaitland Road meets the rural edge with higher densities to the north of the site working in context with the other proposals.

In order to maximise the use of land, SUDS is combined with open space with two SUDS features being proposed; one to the south of Letham Burn and continuing the Letham Park westwards. This could be a wet basin feature. The other SUDS feature is within an area of open space designed to link what



fig. 19: Indicative Development Plan

CONTACT DETAILS

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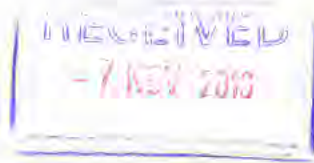
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MICHAEL BUCHANAN

6TH NOV 2016.

REF: DEVELOPMENT OF DRYDEN FIELD, EAST SALTOON.

DEAR SIRs,

I WISH TO STATE MY TOTAL OBJECTION TO THE ABOVE PLANNING PROPOSAL TO 75 HOUSES ON DRYDEN FIELD, EAST SALTOON.

THERE ARE CURRENTLY MANY HOOSING PROJECTS IN THE LOTHIANs, WITHOUT NEEDING TO BUILD ON GREEN FIELD LAND IN A VILLAGE ENVIRONMENT.

AS PLANNERS, BUILDING PROPOSALS ON GREEN FIELD SITES SHOULD BE A LAST RESORT.

75 HOUSES ON 1/2 A FIELD REPRESENTS HIGH DENSITY HOOSING, AND IS ALMOST DOUBLE THE HOUSES OF BURNET CRESCENT + THE GLEES COMBINED (ON ALMOST THE SAME LAND AREA)

IS IT FAIR TO GROW A VILLAGE WITH ONLY 1 PRIMARY SCHOOL (AND NO OTHER FACILITIES) BY 75%?

REGARDING EDUCATION, WHAT THE NEW PRIMARY SCHOOLS WILL STRUGGLE TO COPE WITH THE NEW INFUX, ARE WE HAPPY TO MAKE GENERATIONS OF SECONDARY PUPILS TRAVEL BY BUS/CAR TO THE NEAREST SECONDARY SCHOOLS IN HADDINGTON AND BEYOND?

REGARDING THE 14 + PROPERTIES WITH GREEN FIELD VIEWS TO THE PROPOSED SITE, AS PLANNERS ARE YOU COMFORTABLE TAKING THOSE VIEWS AWAY - AND DE-VALUING THOSE PROPERTIES.


75 NEW PROPERTIES, MEANS ATLEAST 150 + NEW CARS COMMUTING IN/OUT OF THE VILLAGE BRINGING A GREATER ENVIRONMENTAL IMPACT.

WITH REGARDS TO PEDESTRIANS / SCHOOL CHILDREN, THIS DEVELOPMENT WOULD MEAN LARGE AMOUNTS OF FOOT TRAFFIC NEEDING TO CROSS THE B6355.

THE COUNCIL'S OWN STRATEGIC ENVIRONMENTAL ASSESSMENT ON DRYDEN FIELD STATES DRYDEN FIELD IS NOT A VIABLE SITE (SCORE 5 OUT OF 19).

LETS MAKE GOOD PLANNING DECISIONS AND BUILD HOUSES WHERE THEY ARE NEEDED, WHERE POSSIBLE ON BROWN FIELD SITES AND NOT ON GREEN FIELD LOCATIONS AS IT IS THE EASIEST WAY TO MEET QUOTAS!

REGARDS.



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

Dear Mr McFarlane

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

- PROP MH12
- PROP MH13

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

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

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

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

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

Removal of this site from the development plan.

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

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

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

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

Yours sincerely

Name: Mike Hay

Address: 

RECEIVED
27/01/2019

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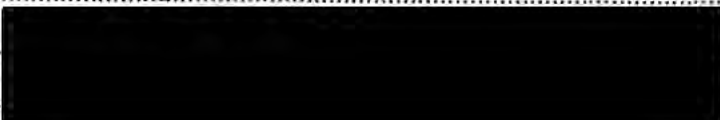
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Yours sincerely

Name: Suzanne Brett

Address:.....



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Yours sincerely

Name: *John Davis*

Address: [REDACTED]



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Yours sincerely

Name: SAMANTHA BROWN

Address: [REDACTED]



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Removal of this site from the development plan.

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

Yours sincerely

Name: *Nichola Taylor*
 Address: [REDACTED]

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



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Name: KAYE NICOLL

Address: [REDACTED]

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Name:

Christina Hall

Address:

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Name: MARNIE SUTHERLAND

Address: [REDACTED]



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 Partnerships & Services for Communities
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 Haddington
 EH41 3HA

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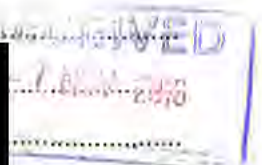
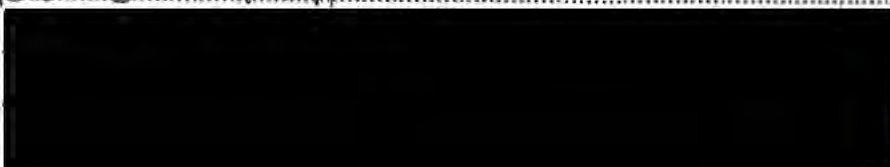
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Yours sincerely

Name:

Maureen McGhee

Address:.....



LR

Planning Application 16/00521/PM**Housing Development Proposal at Castlemains Farm Dirleton**

Dirleton Village Association (DVA) Response 3

Additional Response from DVA following Meeting 15th September 2016.**Play and sports facilities**

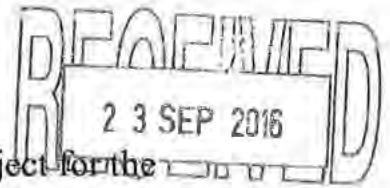
The DVA is considering a conservation area enhancement project for the village. As part of the feasibility study process for this, play and sports facilities within the village are being reviewed. Unlike other small villages such as Athelstaneford or Tynninghame, Dirleton does not have a dedicated community and school playing field. Instead, the 'play zone' is around the castle on Castle Green. The play area is to the south of the main road, and the larger space used for ball games lies to the north of it. The castle tower on the corner, in the centre of this zone, blocks the view of drivers travelling west, and, to a lesser extent, the Castle Inn blocks the view of vehicles travelling east. The present arrangement is therefore not ideal from the safety point of view.

We were recently made aware of the site design brief for the Castlemains Farm site, and commented on the requirement for a '**village green**' or public open space. We welcomed this as an appropriate extension of the historic open space structure of the village, but asked for its length to be extended from 60 metres to 110 metres to protect the setting of the castle.

This additional 'village green', wherever located within the development, could make an ideal, safe, off-road play zone. We would therefore ask for it to be sized to take a primary school pitch for football, touch rugby and kwikcricket etc and appropriately equipped for this purpose by the developer to give added value to the facilities of the Castlemains Development.

Prof Keith Cornwell

Chairman, DVA

16th September 2016



Letham Mains, Haddington (MIR Site OTH-H8)

RESPONSE TO EAST LoTHIAN COUNCIL'S PROPOSED LOCAL
DEVELOPMENT PLAN

OCTOBER 2016

PREPARED BY

COLLIERS INTERNATIONAL

PREPARED FOR

MACTAGGART & MICKEL HOMES
LTD/TAYLOR WIMPEY UK LTD

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Date Approved	7/11/16



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SUMMARY

This response to East Lothian Council's proposed Local Development Plan (pLDP) consultation is prepared by Colliers International on behalf of our Clients, Mactaggart & Mickel Homes Ltd and Taylor Wimpey UK Land. It provides comment on aspects of the proposed Plan which our Clients consider require further amendments, and supports their land interests in the Haddington area.

While, in accordance with Planning Circular 06/2013: Development Planning, the proposed Plan represents the Council's settled position on matters, we strongly urge the Council to consider the conclusions of this report and make appropriate amendments to the plan.

1 INTRODUCTION

1.1 CLIENTS

Colliers International have been instructed by our Clients, Mactaggart & Mickel Homes Ltd and Taylor Wimpey UK Ltd, to make formal consultation responses to East Lothian Council's proposed Local Development Plan 2016.

1.2 LAND INTERESTS

Our Clients have engaged with the Development Plan process at Main Issues Report stage, promoting two sites within the Haddington cluster – Letham Mains expansion area and land to the north-west of Letham House, south of the A199 and B7641. Land at Letham Mains has successfully secured an allocation within the proposed Plan as HN2, and this is welcomed. Their other specific land interest in Haddington however has failed to be included as land suitable for development in the proposed Plan. The representation is made in reference to this unallocated site (identified in the MIR as OTH-H8).

2 CONTEXT

2.1 LAND AT LETHAM MAINS

Mactaggart and Mickel Homes Ltd and Taylor Wimpey UK Ltd made representations to the Main Issues Report (MIR) of the East Lothian Proposed Local Development Plan (pLDP) that land under their control should be identified for residentially led development. The site has not been selected for development by East Lothian Council and is identified in the pLDP as being within the countryside and outside the settlement boundary of Haddington.

In responding to the MIR the project team prepared a Development Framework document to set out why and how the site could be developed in a manner which meets the six key qualities of a successful place, as set out in Government Policy Scottish Planning Policy (SPP), Designing Places and Creating Places:

- distinctive;
- safe and pleasant;
- easy to move around;
- welcoming;
- adaptable;
- resource efficient.

A development framework document was prepared by Optimised Environments (OPEN) and demonstrated how the site could be developed in response to issues raised in the MIR regarding landscape and the open nature of the site. The development framework document has been included in Appendix 1.

3 RESPONSES

3.1 INTRODUCTION

In this section we take each of the sections of the pLDP in turn and comment as appropriate.

3.2 A SPATIAL STRATEGY FOR EAST LoTHIAN

At MIR stage our Clients responded to the consultation suggesting to the Council that the appropriate approach to the spatial strategy would be a hybrid of both the dispersed and compact growth strategy. The strategy taken forward in the proposed Plan however is a compact one. The spatial strategy presented in the pLDP is supported by Development Briefs setting out local placemaking objectives; this is supported and particular support is given for the Development Brief relating to HN2 where some of our Client's interests lie.

We support the allocations of two sites, Letham Mains and Letham Mains expansion at PROPHN1 and HN2 respectively for housing-led mixed use developments.

In addition to the existing sites identified for development in Haddington, we believe the land at OTH-H8 (as identified in the MIR) should also be allocated as a deliverable, viable housing opportunity.

3.3 GROWING OUR ECONOMY & COMMUNITIES

In this section of the plan several proposed policies are outlined. We comment on those relevant to housing, its need and the development of land around Letham Mains.

The SDP requires that the LDP ensures sufficient land to deliver 6,250 homes in the period 2009-2019 and a further 3,800 homes in the period 2019 to 2024.

Policy HOU 1 'Established Housing Land' states that the council will support the principle of residential development on sites within the established housing land supply as set out in Housing Land Audit 2015. Table HOU 1 sets out the established supply which includes HN 1 Letham Mains and HN 2 Letham Mains Expansion (with a capacity for 275) as an additional LDP allocation. As per our other representation we support the identifications of these two sites within Table HOU 2, noting that the proposed allocation does not currently form part of the established supply as it, until the plan is adopted, remains a proposal.

Table HOU2 'Housing Land Requirements and Supply' outlines the Councils' position in regards to the housing land supply against the requirements of the SDP.

The SPP requires that in addition to the housing land requirements, as set by the SDP, that Local Authorities also add a 'generosity allowance' to the housing land requirement of between 10-20%. In contrast to many other local authorities, including those within the SESPLAN SDP area, East Lothian Council do not add a generosity allowance onto each of the housing land requirement figures for each of periods. Taking the minimum 10% 'allowance' the true figure for the East Lothian Housing requirement from 2009-2019 should be 6875 and for the period 2019-24 should be 4180. If the higher figures of 20% are utilised, then the requirement to 2019 should be 7,500 and from 2019-2024 4,560. If these figures are utilised, or indeed some of the allocated sites fail to be deliverable in the plan period then East Lothian Council need to look at additional sites. The subject site is one which should be utilised and could be considered by the Reporter to the Examination of the Plan if any shortfall in housing land is found.

The chapter also contains a section on 'Maintaining an adequate Effective Five-Year Housing Land Supply'. We support the recognition that, in paragraph 3.44, 'if the supply of effective housing land is not enough for the next five years, Scottish Government planning policy would expect this plan's policies on the supply of housing land to be considered out-of-date, and a presumption in favour of development that contribute to sustainable development to be a material consideration' as per the SPP.

Advice box 1 sets out the Council's approach to calculating the adequacy of the five-year effective housing land supply. The basis of this approach is the Housing Land Audit, annually updated conjunction with Homes for Scotland on behalf of the housebuilding industry.

Policy HOU2 refers to the maintenance of the 5-year effective housing land supply, and outlines the situations in which additional land may come forward for development, including policy 7 of the SDP when that 5-year supply is not being maintained. The policy would appear to not serve any real purpose given the statement earlier on within the plan, as the SPP states, that the housing policies of the plan are to be considered out-of-date if the 5-year supply is not being maintained. In that circumstance, then the SPP is to be applied in terms of the presumption in favour of sustainable development. It would appear that such a policy is redundant and we object to the policy's inclusion.

We support policy HOU4 in that it recognises that a wide range of affordable housing tenure models are supported, including social rent, shared ownership and shared equity models, homes for mid-market and intermediate rent, and subsidised and unsubsidised low cost housing for market sale and self-build plots.

Prop ED5 refers to the Haddington Cluster and education. We support the principle of the developer contributions assisting to fund new education provision in the Haddington Cluster. However, it should also be noted that developer contributions should not be overly onerous so as to make development unviable.

Policy CF1 refers to the Provision of New Sports Pitches and Changing Accommodation. It requires one full size grass pitch and two team changing at Letham Mains. It also requires one seven-a-side grass playing pitch at the Letham Mains Expansion. We support this policy and proposal.

Policy OS3 & OS4 refer to Open Space Provision and play facilities within new development. We would support the principle of open space and play areas being provided within the subject site if it is allocated in the plan.

Advice box 2 provides guidance on the level of each of these based upon residential unit numbers:

Number of dwellings	Open Space and Equipped Play Area Requirement	Indicative types of Open Space Provision
10-49	60 sq m per dwelling	Formal/Informal
50-159	60 sq m per dwelling	Formal/Informal
	Play area (s) (20-30m buffer) Possibly allotments	LAP(s) (100 sq m) possibly LEAP (400 sq m) Local Park (approx. 0.2 – 0.5 hectares)
160-499	60 sq m per dwelling	Formal/Informal
	Play areas (20-30m buffer) Possibly allotments	LAP(s), LEAP(s) possibly NEAP(s) (1000 sq m)
	Possibly sports facilities Community event space Car Parking	Local Parks (approx. 0.2 – 0.5 hectares) Town Parks (approx. 0.5 – 1.0 hectares) Possibly civic space
500 upwards	60 sq m per dwelling	Formal/Informal
	Play areas (20-30m buffer) Possibly allotments	LAP(s), LEAP(s) possibly NEAP(s) (1000 sq m)
	Possibly sports facilities Community event space Car Parking	Local Parks (approx. 0.2 – 0.5 hectares) Town Parks (approx. 0.5 – 1.0 hectares) Possibly District Park Possibly civic space

We do not support this policy and consider that the 20-30m buffer for play areas excessive and will impact upon the number of houses being able to be delivered on sites, which in turn may require an increased number of sites to come forward to meet the housing requirement.

3.4 OUR INFRASTRUCTURE & RESOURCES

This section refers to transportation, digital and other networks. Policy T1 'Development Location and Accessibility'. This policy states that new



developments should be capable of being accessed on foot, cycle, public transport as well as private vehicle. We support this policy.

Policy T2 refers to transport impacts and that new development should not have a significant adverse impact upon:

- Road safety
- The convenience, safety and attractiveness of walking and cycling in the surrounding area;
- Public transport operations in the surrounding area, both existing and planned, including convenience of access to these and their travel times;
- The capacity of the surrounding road network to deal with traffic unrelated to the proposed development; and
- Residential amenity as a consequence of an increase in motorised traffic.

We support this policy.

We also support policies T4 & T5 which seeks to protect the Council's existing core path, active travel network and cycle route network.

Policy DCN2 'Provision for Broadband Connectivity in New Development' proposes that development of 5 or more homes, or proposals for employment generating uses with a floor area of 100 sq m or larger, shall as part of the development make provision for deliverable opportunities for digital infrastructure to the proposed new homes or business premises, particularly provision for ducting and fibre or wiring for broadband connectivity. We support this policy.

We offer no comment on the policies relating to major transport infrastructure and energy generation.

We support policy W3 'Waste Separation and Collection' which requires new development to provide appropriate provision for waste separation and collection to meet the requirements of the Waste (Scotland) Regulations.

Policy W4 'Construction Waste' requires that site waste management plans should be submitted with all planning applications. We do not support this policy in that it appears to require waste management plans to be provided 'up front' with planning applications. We believe that this is a matter which can be dealt with by planning condition. We object to this policy therefore and suggest it should be amended to state that submission of waste management plans can be dealt with by an appropriately worded planning condition.

We offer no comment on minerals policy.

3.5 DIVERSE COUNTRYSIDE & COASTAL AREAS

We note Advice Box 5 which defines 'countryside' as those areas of land outwith settlement boundaries. The site identified as OTH-H8 (identified in the development framework in Appendix 3) is identified as being within the countryside. As such Policy DC 8 'Countryside around towns' is relevant to this representation. We object to the site being within the countryside and seek that it be allocated for residential development which can deliver housing before 2019 as required by SESPLAN. The development framework in Appendix 3 demonstrates how the site can be developed in a sensitive manner taking account of the issues raised in the MIR.

We offer no comment on any of the other policies within this chapter.

3.6 OUR NATURAL & CULTURAL HERITAGE

We offer no comment on policies relating to natural heritage as they do not affect our client's landholdings at Letham Mains.

We support Policy NH8 'Trees and Development' in that there should be a presumption in favour of retaining East Lothian's woodland resources.

We note Advice Box 7 on Sustainable Urban Drainage Systems. The relevant Policy on SUDS, NH10, is supported in that SUDS should be designed at the planning application stage and submitted with all development proposals. We welcome the commentary in paragraph 6.30 in allowing a variety of types of SUDS feature in developments.

We offer no comment on policies relating to flooding, air quality or noise as our clients landholding are not affected by potential flood risk, air quality issues or noise issues.

Neither do we offer any comment on cultural heritage matters such as Listed Buildings, Conservation Areas or Scheduled Monuments as the subject sites are unaffected by these matters.

3.7 DESIGN

We welcome the section on design and the recognition of the qualities of successful places outlined earlier and in the SPP. Our clients are committed to delivering a high quality of design in their developments.

We support Policy DP1 'Landscape Character' which requires that all new development be well integrated into its surroundings and include landscaping and open spaces. Both sites at Letham Mains are supported by Development Frameworks which demonstrate that they can be developed to a high standard of design, and in a design-led manner.

As such, policy DP2 'Design' is also supported and we note Advice Box 11 which outlines the situations in which design and access statements are required to support planning applications.

We note the principle behind the housing density policies and the need to increase density to efficiently utilise land. However, we are slightly concerned as to this being prescriptive in policy DP3 that all new developments should achieve a density of 30 units per hectare (net). Rightly the supporting text indicates that density should arise out of the design process, however topography and physical features on land may prevent higher densities being achieved. We note that in certain circumstance the policy allows design to dictate that densities maybe lower and justified through masterplans and design statements.

Policy DP4 refers to Major Development Sites which are sites greater than 50 residential units or 2Ha in size (in terms of residential). We note that this policy requires the submission of a masterplan of the entire site. In many cases this is appropriate, however in cases where multiple developers (who may be unknown) may be on a site, and multiple phases are involved that a masterplan may not be wholly suitable. On other sites with multiple phases and multiple developers involved we have successfully utilised masterplan guidance to inform the development of the site in phases. This allows flexibility for future developers to design the site as they see fit, within the parameters of design guidance. We believe that the policy should include an allowance for this approach and therefore object to the policy as it is currently worded. The policy should read 'masterplans, or masterplan guidance must be submitted prior to.....'

We support policies DP 8 'Design Standards for New Housing Areas' and DP9 'Development Briefs'.

3.8 DELIVERY

The delivery section of the plan provides the policy link between the LDP and the Action Programme as required by the SPP. We welcome the Draft Action Programme as produced by the Council. We consider however that there is limited information on development timeframes within the Draft Action Programme.

We support Policy DEL1 'Infrastructure and Facilities Provision' which requires developers to make appropriate provision for infrastructure and community facilities required as a consequence of their developments. We note that the supporting text states that developers are not required to provide more mitigation than necessary to address the impact of their development in accordance with established planning case law and practice.

4 CONCLUSIONS

On behalf of our clients we have set our representations to the East Lothian Proposed Local Development Plan, much of which we support. We would welcome the opportunity to discuss our objections in more detail with Council officers, in particular, the potential development of the OTH-H8 site and its inclusion within the plan going forward.

Should any question arise out of the representations outlined in this report please do not hesitate to contact Colliers International.

Appendices



1 DEVELOPMENT FRAMEWORK

The Haddington Cluster: Site OTH-H8, Letham Mains

Development Framework: Submission to the ELC Main Issues Report

February 2015





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- 1.2 Site Description

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- 4.1.1 Landscape description
- 4.1.2 Landscape character

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Scale: 1:50,000

OTH-H8: Land promotion boundary

HADDINGTON

LETHAM MAINS

OAK TREE JUNCTION

A1

DEPT. WEST FORD RD

A1

A1

A6303

A6307

B6369

B6368

A6308

A6308

RIVER TYNE

TOWN CENTRE

Letham Academy

Letham Primary School

Letham Burn

Letham House

Letham Small Holdings

1 Introduction

1.1 Submission

This is a submission to the East Lothian Council Main Issues Report 2014. It concerns site OTH-H8 in Haddington. This is a site which the Council are considering as one of the "Reasonable Alternative Sites and Other Site Options" around Haddington.

Site OTH-H8 is shown on the adjacent Figure 01; the site area is 14.1 ha and the Council has suggested a capacity of up to 350 houses within Appendix 7 of the MIR.

West Haddington will change significantly over the next twenty years or so as Letham Mains is built out alongside the preferred allocations at Letham South (an expansion of Letham Mains), Dovecot and Gateside East. Within that context this submission supports development at OTH-H8 and seeks to demonstrate how it could be integrated with Haddington and fit well within the landscape, at the same time establishing a robust development edge to the west of the town.

This document sets the site in context, looks at how Haddington will expand and demonstrates the principles for how the site could be successfully developed. This includes technical background on the access and service strategies for the site, the principles for which are summarised within the text with detailed reports accompanying this submission.

1.2 Site Description

The site is currently under agricultural use and within the control of the site promoters, Mactaggart and Mickel and Taylor Wimpey. The site is located to the west of Haddington within what is currently the rural edge to the town but with the urbanising influence of Oak Tree junction off the A1 to the north. To the east lies Haddington, county town of East Lothian; to the south are the Letham smallholdings. The Letham smallholdings is a distinctive cluster of land pockets with a unique character which were believed to have been built before the Second World War in response to the act of 1911 enabling the production of food locally. These are now however mainly residential properties albeit many with small outbuildings still attached; there are several of these within the area.

The boundaries of the proposed residential site area are as follows:

The southern boundary consists of the Backburn Wood; a mature dense strip of woodland which edges the Back Burn. The Letham Burn forms the northern edge of the site.

Within the south-western corner of the site are agricultural seed merchants which consists of large agricultural sheds and some parking. These are separated from the site by a low bund and some hedge and tree planting.

The western boundary is partially formed by this operation and partially by the minor road which connects the A199 with the A6093 (Pencaitland Road) via the Letham Mains Smallholdings. Aside from a few small field trees this boundary is open.

To the east the site is enclosed by the double avenue of trees leading to Letham House.

The northern edge is defined by roads: the A199, the edge of Oak Tree roundabout and the B6471 leading into Haddington.

It is noted within the Council assessment documents that the land area is prime agricultural land, supporting a wide range of agricultural crops. This land use classification is well-represented within East Lothian as evidenced within the Monitoring Statement accompanying the MIR.



View looking north up western boundary



Agricultural sheds on the south west corner



Letham small holdings



2 Planning Policy Context: OTH-H8

2.1 Development Plan Policy: Local Development Plan Main Issues Report

The site identified as OTH-H8, West Letham, is this Main Issues Report is designated countryside in the adopted Local Plan. The MIR is to be the Council's concentrated view on key changes which have occurred since the last Local Plan and their ideas for future development. It should identify the Authority's preferred sites, which should be based on "an understanding of place, together with consideration of deliverability factors such as site viability and housing land effectiveness." (Circular 6/2013 - Development Planning, paragraph 67)

In relation to this specific site, the Council have stated in their published MIR that site OTH-H8 "is another option for the expansion of Haddington. Site access from the local road network may be possible... the site is visually exposed..."



Extract from the ELC Main Issues Report

the open nature of this land is important to the character and setting of Haddington... Education capacity would be a significant issue as with other sites in this area. Integration with the existing settlement is also a concern, via path links," (MIR page 124) It is held that the site could lend itself to residential development through a sensitive and well-thought out design-led approach. The known constraint of education across this MIR area requires to be addressed by all potential development sites and will require a coordinated approach in the medium/long term. Any development proposal relating to site OTH-H8 would have to accord with this approach.



Letham Mains masterplan: East of OTH-H8

2.2 Development Plan Policy: Strategic Development Plan - SESplan

Within SESplan East Lothian is defined as a Sub-Regional Area with the strategy "builds on existing committed development, focusing further development along preferred corridors optimising connectivity and access to services and jobs further development will be focused in thirteen Strategic Development Areas acting as the primary locations for growth and investment." (Page 19)

East Lothian's Economic Corridor runs through Haddington itself and includes the subject site.

The East Lothian SDA must provide for and maintain a five-years effective housing land supply at all times. It also advocates the use of greenfield housing development proposals either within or outwith the identified SDAs of



Sainsbury's consented proposals: North-east of OTH-H8

2.3 National Planning Policy: Scottish Planning Policy (SPP)

the SDP where required. Policy 7 of the Plan. Maintaining a 5-Year Housing Land Supply allows for sites for greenfield housing development proposals either within or outwith the identified Strategic Development Areas to be allocated in Local Development Plans or granted planning permission to maintain a five years' effective housing land supply, subject to satisfying three criteria:

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

In relation to these criteria, it is concluded that a sensitive design approach can be taken to any development in this location which would, through robust landscape and building design, remove any perceived negative effect development in this location might have on the character of the settlement.

The current site is not designated greenbelt in the adopted Local Plan and its continued allocation in the proposed LDP going forward will not undermine wider greenbelt objectives of the area.

It is acknowledged that at present there are education constraints on future development in this area however it is further considered that solutions can be established for the necessary housing supply required in the SDA under SESplan.

SPP advocates locating the right development in the right place where "good planning creates opportunities for people to contribute to a growing, adaptable and productive economy." (Paragraph 16)

The SPP "introduces a presumption in favour of development that contributes to sustainable development" and "The planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term. The aim is to achieve the right development in the right place. It is not to allow development at any cost."

Importantly, SPP supports that "Local development plans... allocate appropriate sites to support the creation of sustainable mixed communities and successful places and help to ensure the continued delivery of new housing." (Paragraph 122)

The proposed inclusion of site OTH-H8 in the emerging Local Development Plan as land for residential development would, supported by a focused design response to known concerns as set out in the MIR, accord with these provisions of SPP.

Once the Preferred Sites identified in the MIR have delivered, there remains a significant question regarding the location of future housing development for the town and wider SDA. There is known demand for residential development locations across the area which lies in closer proximity to main access routes and in close proximity to the defined economic corridor across East Lothian.

MIR sites OTH-H6 and OTH-H7 are considered less favourable future development opportunities than OTH-H8. The A199 fulfils the function of a firm barrier to development north of Haddington, removing the possibility of sustainable and logical development in this location. An eastern expansion of the town (OTH-H6) would result in highly visible development in areas which is likely to impact significantly on the Conservation Area of Haddington and both Lennoxlove (south) and Stevenson House (east) which appear in Historic Scotland's Inventory of Gardens and Designed Landscapes. Equally, development to the south-west of the town (OTH-H7) would infringe on these assets also and not benefit from direct access to the town centre, its services and facilities or indeed easy access to the wider road network.

In response the Countryside Around Towns designation being promoted in the MIR, which would directly affected site OTH-H8, it is concluded that there is no requirement for such a designation in the emerging Plan. The Planning Authority has, it is held, sufficient ability to restrict and impose design approaches to sites they deem to be pressurised from development. Such a designation is in complete contrast with the requirement of National Policy to create sustainable communities, where sites closer to town centres and local services are an obvious location for future development. In reviewing the existing housing land shortage across the MIR area and looking beyond the period to 2024, it is strongly urged such a designation is resisted on sites which are likely to be the most logical and effective to meet future housing land supply needs. If the designation endures it is likely that development will be displaced to less sustainable locations.

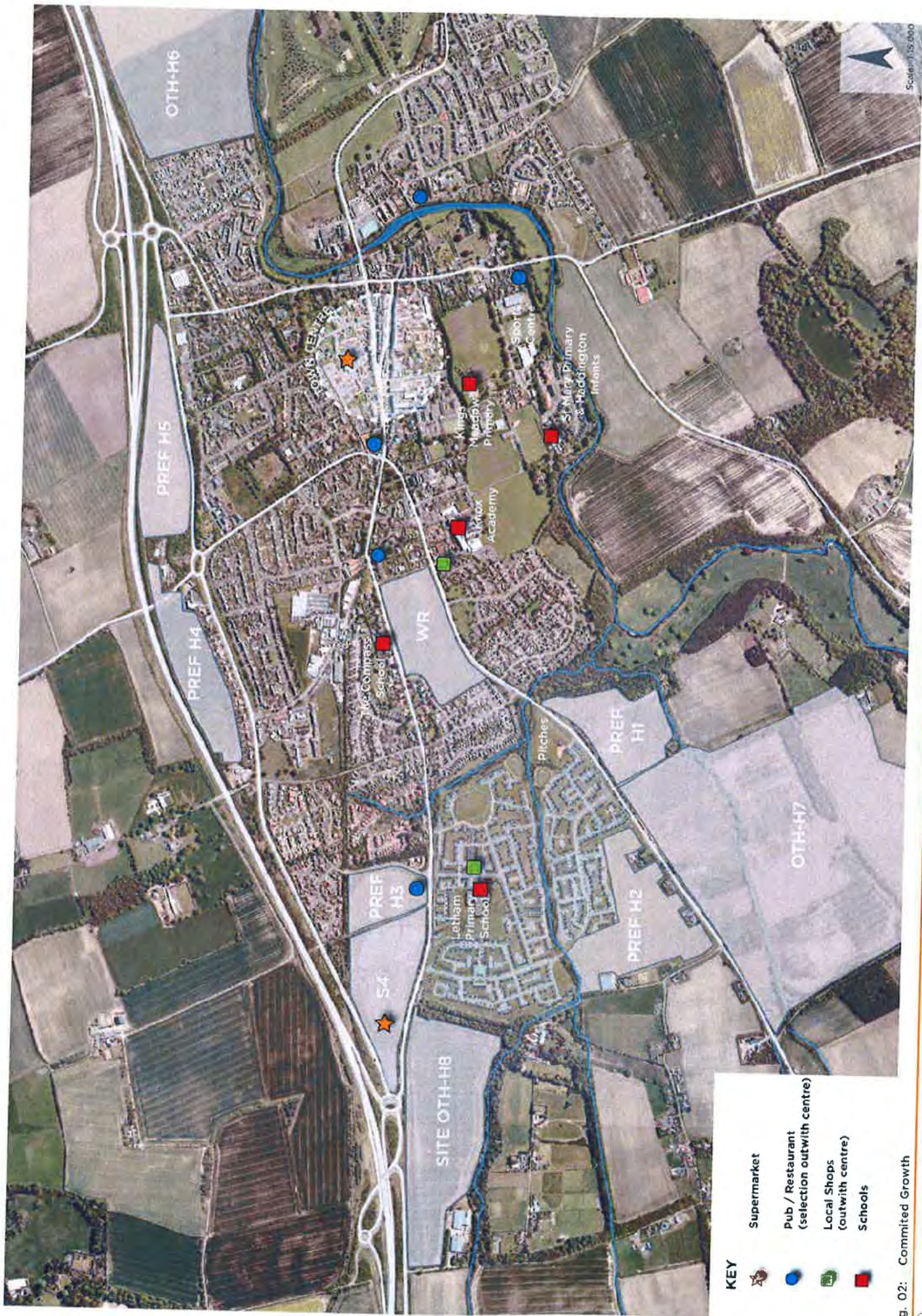
A design-led approach to the detailed development of site OTH-H8 would be best established via the preparation of a development framework for the site. Our Clients are supportive of this approach.

Site OTH-H8 is in the control of developers and is a viable development option with obvious advantages.

There are no known contamination, funding, marketability or infrastructure issues and access can be achieved as is demonstrated in the concept plan. It is acknowledged that education provision is an existing issue for development proposals, however in the longer term it is believed that this can be dealt with to allow development to proceed.

The development framework would address the issue of connecting the site with the town, its services and facilities which lie circa 1.5km to the east. The site benefits from direct linkages to the A199, A1 and B6471 which provide connections east and west, in line with the economic corridor illustrated in SESplan.

In light of the above, it is considered that site OTH-H8 should be allocated for residential development in the medium/long term in the emerging Local Development Plan, this to allow a robust development framework to be prepared for the site addressing known concerns of visual impact, creation of a strong urban edge, integration with the town and facilities to the east and education capacity issues.



- KEY**
-  Supermarket
 -  Pub / Restaurant (selection outwith centre)
 -  Local Shops (outwith centre)
 -  Schools

fig. 02: Committed Growth

3 Haddington: Growth

3.1 Overview: Current

Haddington is a former medieval Burgh and the county town of East Lothian; it currently has a population of around 9,000. This supports shops, cafes, bars, restaurants and commercial activity in addition to offering medical facilities and being the administrative centre of East Lothian.

Haddington boasts many of the qualities synonymous with the best that East Lothian has to offer: a high number of listed buildings which together with more than one Conservation Area contribute toward a unique identity. A number of Gardens and Designed Landscapes, some -but also some not -included on the Inventory held by Historic Scotland which again contribute toward the character of place and a strong relationship between landscape and urban area lent by topography, elevation and a lack of abruptness between rural and urban area.

Whilst Haddington remains distinctive, growth rates have accelerated since the 1960s and newer development has taken

a variety of forms. In order not to dilute the sense of place which makes it such an attractive place in which to live, it is important that new development should be of high quality, well-located within the landscape, with careful consideration to the street structure and massing as well as the detail.

The sites which have been identified as being the Preferred sites for growth as shown on the accompanying Figure 02 "Committed Growth". By including the (already allocated) Letham Mains site which is currently awaiting determination, the housing numbers for these sites total 1,138 - the majority of which are anticipated to come forward by 2024. This will increase the population of Haddington by some 30%. It is important therefore to direct growth beyond 2024 to where it can both connect easily to the existing infrastructure as well as offering good fit within the landscape.

The accompanying diagram also highlights the location of current and committed facilities including education and local

services. Many new services currently proposed, including a new primary school and commercial and shopping space, are located within the north-west of the town.



Current view looking east toward Haddington at Oaktree roundabout; Sainsbury will be built on the land to the left.



Current view south across Letham Mains. This will combine with Sainsbury to significantly extend perception of the edge of Haddington.

3.2 Future Growth: where next?

Beyond 2024, in the medium to long term, Haddington is constrained in terms of where to grow next.

Inventory and non-inventory landscapes, the Conservation Area and its setting, together with the defensible edge formed by the Tyne and its floodplain all serve to limit the location of future growth of the town. This is compounded by the A1 providing a clear boundary to the north.

Three sites have come forward during the pre-planning stage to the revised Local Development Plan. Firstly site OTH H8, "West Letham" and the subject of this submission. This is located on the western edge, at the entrance to Haddington from the A1. The Council perceive the issues for this site to be:

- visual exposure
- beyond the defined urban edge
- impacting on the character and setting of Haddington
- Education capacity
- Problematic integration with the town.

Secondly there is Site OTH_H7, Dovecot which lies to the south-west of Haddington. This is not being promoted, rather is an area of search by the Council. The Council perceive the issues for this site, within the MIR, to be:

- Impact on character and setting of the Clerkington designed landscape
- Education capacity
- Structural landscape and open space along the edge required to create an attractive edge and setting for the town.

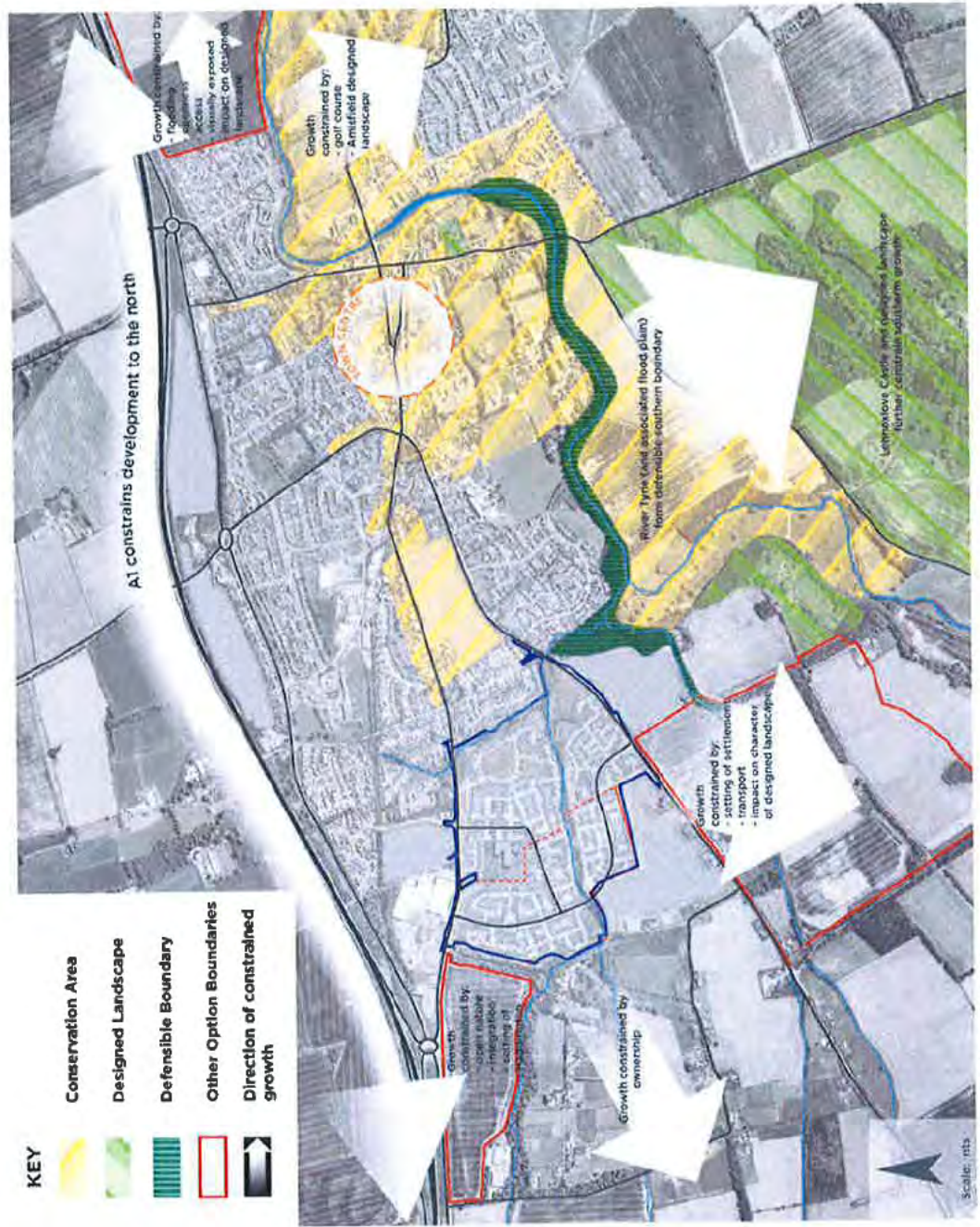


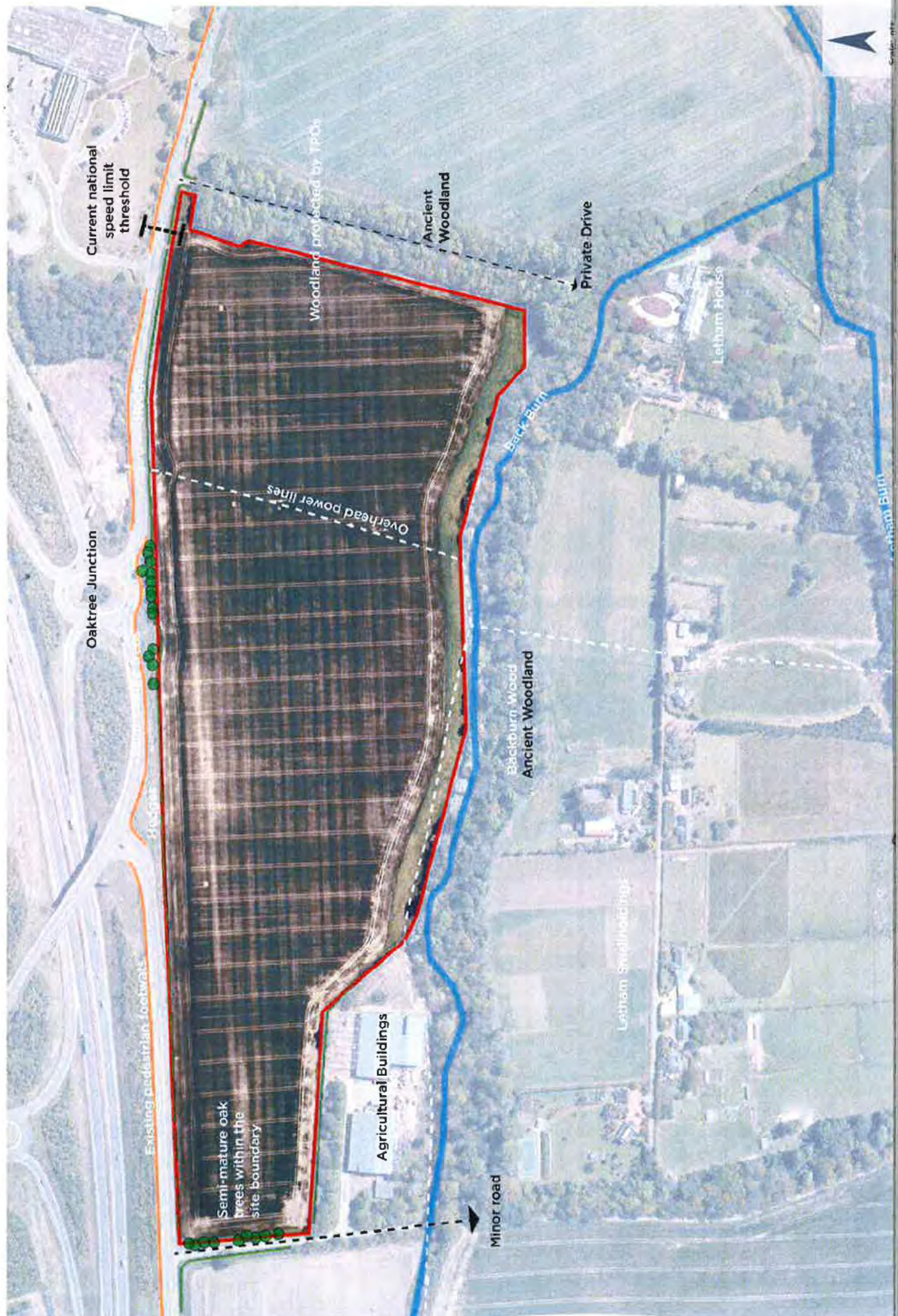
fig. 03: Growth Opportunities

Thirdly site OTH-H6, Amisfield, lies to the east of Haddington. The Council note the following potential issues regarding development of this site:

- Access may not be deliverable
- Partly within an area of flood risk
- Open character integral with the setting of Haddington
- Impacts on the Amisfield Designed Landscape and Conservation Area
- Harmful impact on the character and setting of the town.

The only other possible direction of growth is the south-east. This is not being examined within the MIR; there would be significant transport and connectivity issues, amongst others, connected to growth within that area.

Clearly, directing where Haddington should go next has no easy solution and the selection for future expansion should be a transparent solution fully explored on all aspects of placemaking.



Current national speed limit threshold

Woodland protected by TPOs

Ancient Woodland

Private Drive

Letham House

Backburn Burn

Overhead power lines

Oaktree Junction

Existing pedestrian footway

Semi-mature oak trees within the site boundary

Agricultural Buildings

Backburn Wood Ancient Woodland

Minor road

Letham Small Holdings



4 Site OTH_H8

4.1 Site Identity

4.1.1 Landscape description

The site is currently farmed as a single field. It is used for arable production. It slopes gently from the north-west to the south-eastern corner but is perceived as being relatively flat.

It is open on the western edge but takes character from the backcloth of mature woodland to the south and east of the site. "Arrival" to Haddington could be considered to be at the Oak Tree junction, the roundabout off the A1 which then leads onto West Road and into the centre of Haddington. The site is visible from this as the boundary is open in part with sections of hedgerow and trees providing some localised screening.

There are agricultural buildings within the south-west corner which are seen against the mature woodland and not on the skyline hence these are not immediately visible.

4.1.2 Landscape character

As the accompanying figure shows, the site is located within the "Lowland Plains" landscape character type (LCT). This is based on published information within the Scottish Natural Heritage (SNH) Landscape Character Assessment prepared their by the ASH consulting group in 1998.

LCTS are grouped according to common characteristics of geology, soil cover, topography, land cover, land use, landscape features, landscape characteristics and landscape experience.

The Lowland Plains is the most extensive of the LCTs within the Lothians.

This area is within the subdivision of the Haddington Plains local character area (LCA). This is characterised by its slow and undulating land form, which follows a predominant east to west orientation. Low ridges and valleys follow this orientation rising gradually toward the upland fringes of the Lammermuirs to the south. The River Tyne, skirting around the south of Haddington, forms a discreet river valley. Small burns, incan the Back Burn are channelled from the upland fringes in the south to feed into the Tyne.

The land area within the LCA is used predominantly for arable production, and the geometric field pattern characterises the Haddington Plain. Boundaries are defined subtly, sometimes by post and wire fences but more commonly by hedgerows and occasionally stone dykes. Intermittent shelterbelt sand woodland copes add scale and character to what is otherwise a generally low and open landscape

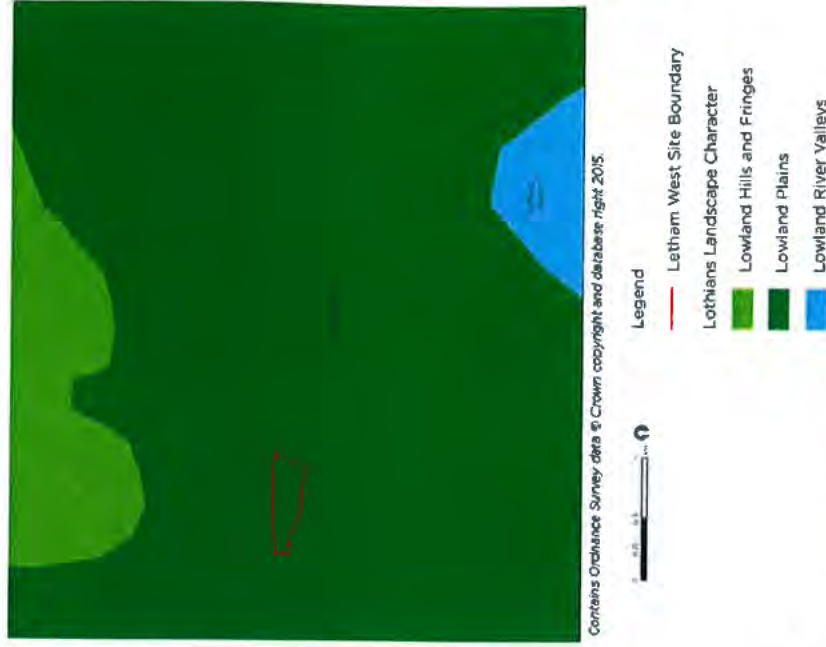


fig. 05: Extract from Letham LVIA

The listed buildings and extensive woodland policies associated with the Designed Landscapes around Haddington make a notable contribution toward the character of the wider landscape.

The Haddington Plain is a settled, as well as cultivated landscape. This is especially notable to the west of Haddington with the distinctive form of the Letham Mains smallholdings but farmsteads and isolated [properties occur intermittently across the wider landscape.

Settlements within the LCA are typically small; the greatest exceptions are Tranent and Haddington. The historic core of Haddington's origins as the main market town remains intact; more recent development has expanded the town in all directions however, up until now most notably to the south-east.

4.1.3 Topography

The accompanying diagrams highlight the slope and elevation around the west of Haddington. The slope diagram demonstrates that the site is relatively flat, hence suitable for easily creating building platforms, and that in elevation terms its higher toward the west but is contiguous with the surrounding landform.

4.1.4 Landscape designations

Landscape designations covering the site are shown on the attached diagram.

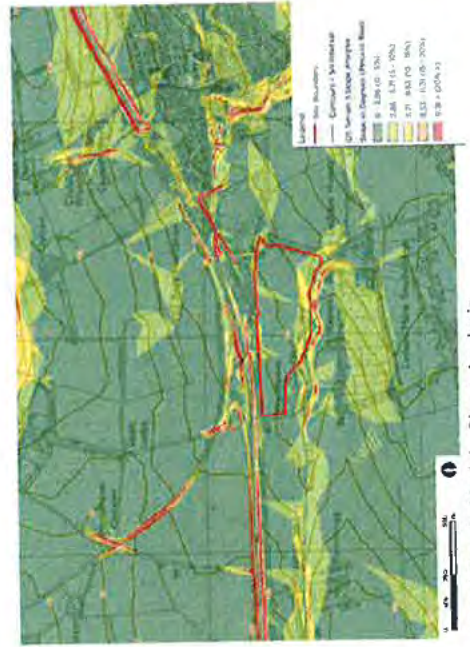
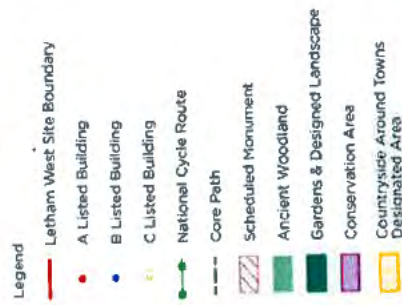


fig. 06: Topography

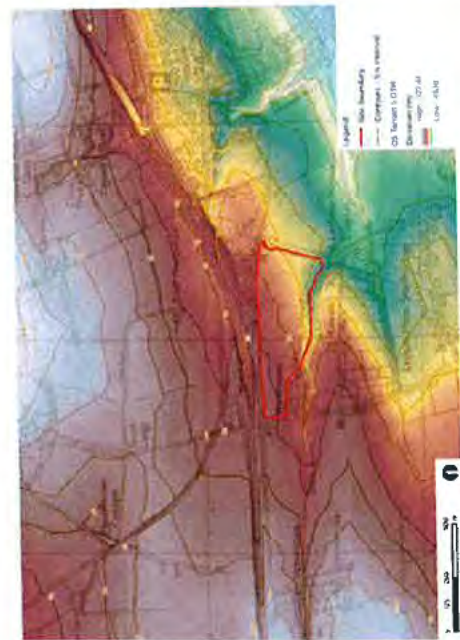


fig. 07: Extract from AGLV (under ongoing review)

The Blackburn and Letham Woods to the east and south of the site are both protected by Ancient Woodland status. The nearby Letham House has Category B status however is not visible from the site.

The core path which runs through the Letham Mains allocated site continues to the south of the site through the Letham Mains smallholdings. Otherwise there are currently no other policies, and no Historic Gardens and Designed Landscapes within close proximity.

The site is within the proposed area for a new policy of "Countryside Around Towns" which has been identified within the MIR. It is salient to therefore look at this proposed policy status in more detail.

The function of the new Countryside Around Towns policy is defined within the MIR as

"Performing a similar role to a Green Belt designation"

"Retain separation between communities"

"Where the setting and identity of settlements or landscape features not in the Green Belt merit protection from significant built development"

"Where...Policy 7 of the SDP should not be applied" namely "Maintaining a Five Year Housing Land Supply"

There is no methodology within the MIR as to how the boundaries for this new policy have been drawn. Within the consultation the Council signal intent to promote the designation where setting, identity or landscape features not in the Green Belt merit protection from "significant" built development. The Council goes on to set out the types of land use that would be acceptable under the policy eg community and essential infrastructure but without giving a draft of the policy in full in which to understand this further.

Mention is also given toward being positive toward development which contributes toward CSGN objectives. Specific settlements, including Haddington, are set out as being subject to the policy: but with no justification as to why these have been selected or the long term implications for this policy beyond this plan period. Especially given the constraints to future growth set out within the previous session where, with only 3 potential growth areas currently available, having then promoted the CAT policy and applying it to 2 of these (Letham West and Amisfield) the Council seem to be already subtly directing the direction in which they wish Haddington to grow next.

Some further thought regarding this is set out within Section 5 of this submission, Strategy.



View from Gariton Hill

4.2 Appraisal from key viewpoints

The MIR expresses concerns over the contribution that Letham West offers to Haddington in terms of its rural setting, and that the impacts that will have on the change of character for the area, it would:

“...significantly change the character of the western approach into Haddington from the Oaktree junction from open rural countryside with extensive views southwards, to a large scale urban housing development. If noise mitigation measures are required, they may have an impact upon the landscape and/or surrounding views from the A1.”

A visual survey was undertaken in January 2015 in order to review the sensitivities of development at Letham West. A number of viewpoints were chosen which would both be representative of the site and allow the concerns being raised by the Council to be examined. This is intended as a preliminary appraisal and does not constitute an LVIA.

Views were checked from the south, but mature woodland screened any views towards it.

Views were checked from the west and it was only relatively close to the site that it became apparent (viewpoint 4); this location was selected as a representative viewpoint for how the site sits within the landscape and a view on the eastern edge shows the character of the site (viewpoint 1).

The first views from the east travelling west along West Road are from the bus stop to the west of the trees lining Letham House Avenue and only the upper north-east corner of the site is seen from this location. The viewpoint was selected further along beyond the avenue (viewpoint 3), which provides an effective screen, in order to be representative of the site itself.

Wider views from the north were examined firstly from the minor road to the north that leads past the quarry and the site could not be discerned due to topography and woodland; further east, and more elevated, the site can be glimpsed in part from the Garleton Hills. This is shown here as viewpoint 5. Then, coming closer to Haddington, the principal views of the site are on arrival at Oaktree roundabout (Viewpoint 2).

Each of the viewpoints are described within the following pages. The following points provide a summary of key findings:

- The site is well-contained within the landscape. Principal areas of visibility are to the west where there is no definitive edge, and from the immediate north where there are clear views over the site;
- Views on arrival into Haddington across the site are expansive but contained by the mature tree belt to the north; the site slopes toward the south and the middle ground is dominated by mature trees with the Lammermuirs behind. This is not an open view;
- Once the current preferred sites have been built within West Haddington, any one of the options remaining will impact on views and setting; potential effects of development of the site have to be viewed within the context of projected change and not as it is now;

The Council make assumptions about the likely development: “large scale urban housing development”. The character of new development can vary greatly and other options should be explored in order to enable the best possible perception of Haddington on arrival following the projected changes:

- That withstanding, the greatest level of landscape change will be when travelling along and along the northern boundary edge, and including arrival at Oaktree. Preliminary concepts for mitigation are outlined here, and further developed in later stages of the report.



Viewpoint 1: View from the NW corner of the site at the bus stop on the A199

View Description

This is the view of people waiting for a bus or for those driving toward Oaktree junction along the A199.

The agricultural seed merchant's buildings are apparent to the right of the view but the colours are not dominant in the landscape, and the rooflines are below the tree belt to the south, hence the visual impact of their mass is not as great as might be expected when seen on an aerial photograph.

The view is characterised by the openness of the field, which is contained on two sides by mature trees. The Lammermuirs are visible above the tree line. There is a sense of the urban edge in the distance with overhead lighting visible around Oaktree roundabout, the character of the A199, and intermittent noise from the A1 - these detract slightly from the rural character.

Effects of development

This is a view close to the site and development of it will inevitably change the character of the landscape as a result, from rural to urban. Other context which will have to be taken into account is the construction of the Letham Mains site which will include development on the other side of the Avenue. Bare ground is just discernible in this winter view and during the winter months in particular the lights of development will be apparent, bringing the developed edge closer.

Possible mitigation

Mitigation is best served by creating new development which will have a character appropriate to being on the edge and hence being "semi-urban" rather than "urban". Development should take careful consideration of the character of the A199, and seek to continue the existing strong landscape framework which is evident in this shot. Keeping development below the tree line will also be important in keeping development contained.



fig. 08: VPI Location

Proposed development site

Agricultural sheds



Viewpoint 2: View from Oaktree roundabout looking directly south

View Description

The viewpoint has been taken close to the public footway. This is a view across an open field. In clear conditions there are distant views of the hills from this location. This view is experienced by road users and pedestrians.

The trees on the south contain the view with no glimpses to the Letham Mains Smallholdings buildings behind. Looking westwards the view is of Letham House Avenue on the eastern boundary, and signage entry to Haddington just seen.

The view is characterised by the openness of the field but is influenced by the urban edge. Oaktree is a lit and busy junction with constant activity and traffic noise; overhead lines are visible on the site.

Effects of development

This view is seen at close range and inevitably will change character as a result of development. The degree in which it changes the character of approach, however, is arguable. This view will change as a result of already committed development. The new Sainsbury, on the western edge and which will be visible when standing at this location, will be heavily lit (the petrol filling station is located at the front of the site) with large signage; there will be a pedestrian crossing with refuge island close to this viewpoint that will also be signed and lit. Letham Mains development will be visible through the trees.

Possible mitigation

Mitigation will best be achieved through positive design; accepting that a large degree of change is occurring to the character west of Haddington. A well-designed development can provide the appropriate urban edge to the expanded settlement and would also offer a transition to the rural setting. This will necessitate a landscape-led solution which may be relatively low density in part and with significant planting.



fig. 09: VP2 Location



Viewpoint 3: View from the NE corner of the site looking west; over the site and along West Road



fig. 10: VP3 Location

View Description

Similar to the previous viewpoint but looking west rather than looking east, and where there is no public footpath at present. It is a viewpoint that will therefore be experienced by road users.

Effects of development

As previously, construction of Sainsbury will impact on the character of this view to a large degree. The combination of filling station, store, signage, traffic movements and pedestrian crossing points will all urbanise this view. Increased urban noise as a result of the residential developments at Letham Mains and Gateside East.

Possible mitigation

As before, best mitigation will be achieved through taking a positive approach to change through the application of good design. This should enable a transition between "urban" and "rural".



Viewpoint 4: View from the west of Haddington looking back toward the site



fig. 11: VP4 Location

View Description

This is a public viewpoint from a layby west of Haddington and represents the first view of the site when travelling eastwards. There is a cycle lane at this point and a track from the layby leads to the bus stop further east. The edge of the site is just over 1km from here.

The character of this view is lowland rural, with attractive views toward the hills; a managed landscape with rural properties and agricultural buildings. Some influence from the character of the road and associated signage.

Effects of development

The agricultural buildings can be seen in the distance, allowing identification of the site. Mature woodland breaks up the relative flatness of the landscape and fringes the proposed development site. Development would be seen spilling into the rural area.

Possible mitigation

Development could be mitigated by planting up the western boundary with dense planting that would combine in this view with existing planting and screen development. Careful use of materials, lighting and keeping development below the tree line will further benefit potential views.



Viewpoint 5: View from Garleton Hill



fig. 12: VP5 Location

View Description

Expansive view from a public viewpoint, and popular walking area, showing the typical characteristics of the Haddington Plain landscape character area: a low and gently undulating landform, east-west orientation of low ridges and valley forms which are rising in elevation toward the Lammermuirs. A settled, arable landscape.

Effects of development

The site is barely discernible and development will not influence the essential characteristics of this view.

Possible mitigation

Impacts will be minimal, if any, but a substantial landscape framework will enable it to fit further within the landscape.

4.3 Technical overview

4.3.1 Geophysical

A preliminary environmental desk study has been carried out in order to establish potential environmental and geotechnical constraints associated with the site. This appraisal is included in full alongside this submission but the main findings affecting the appropriate due diligence are summarised here:

Archaeological

The site has moderate potential for archaeological remains to be present. Accordingly, once a detailed desk study is required, the Council archaeological officer should be consulted in order to confirm the requirement for a watching brief during work on site.

Environmental

The historical map review indicates the site to have been used for agricultural purposes, although the nature of farming has not been fully established. Once established, this will influence the nature of environmental testing which may be required as part of the ground investigation.

Two small warehouse buildings are located immediately south west of the site. While the warehouses are unlikely to be a significant source of contamination, targeted investigation adjacent to these buildings, or the boundary of the subject site closest to the buildings should possibly be undertaken to establish the nature of the ground conditions.

The site is not within a radon affected area.

Geotechnical

There is the potential for a superficial groundwater body in granular deposits, which may cause some issues during earthworks and excavation for foundations. The hydraulic regime should be established as part of the ground investigation to further assess the impact of superficial groundwater on the development.

Significant earthworks are not anticipated due to topography. However, the earthworks balance should be considered if there is the potential for soils to be classified as waste and require off-site disposal, including topsoil.

Available geological information indicates the site is underlain by glacial till which is likely to be a suitable founding stratum for the proposed residential dwellings; however this should be confirmed through ground investigation.

In summary, there are not anticipated to be any significant issues or constraints which would preclude this site from being developed for a residential end-use.

4.3.2 Flood risk

The site slopes from north to south with elevations varying between 90mAOD adjacent to the A1 to 70mAOD in the south east corner.

The Back Burn, within the woodland to the south, flows from west to east along the south boundary of the site, before turning to the south and combining with an un-named watercourse to form the Letham Burn. The Letham Burn eventually flows into the River Tyne. The Back Burn is culverted beneath the unclassified road forming the west boundary to the site and beneath the private access road to Letham House at the south east corner of the site.

SEPA's new flood maps (SEPA 2014) provide guidance on the possible extent, depth and velocity for different likelihoods ('High, Medium and Low') of three different sources of flooding (River, Sea and Surface Water), alongside other associated information.

The resolution of the mapping does not provide site-specific detail. Fluvial flooding associated with the Back Burn is identified on the SEPA Indicative Flood Map. The flood extent is limited to the wooded area alongside the burn in all scenarios and does not extend into the site.

No part of the proposed development site is shown to be at risk of flooding from surface water.

The flood maps do not however consider the interaction between sources of flooding. The river flood map is based on a two dimensional flood modelling method applied across

Scotland to all catchments greater than 3km² and includes hydraulic structures 'where appropriate information was available'. Whilst the flood maps can be a useful tool for initially considering whether a site may be at risk of flooding, the following caveat is attached to their use:

"The Flood Maps are indicative and of a strategic nature. Whilst all reasonable effort has been made to ensure that the Flood Maps are accurate for their intended purpose, no warranty is given by SEPA in this regard... It is inappropriate for these Flood Maps to be used to assess flood risk to an individual property."

More detailed analysis is therefore required to fully understand the flood risk to any development site.

Flood Risk Analysis

At this location there are several potential sources of flooding that may require to be considered:

- **Fluvial flows:** Extreme fluvial flood events have the potential to cause rapid inundation of properties whilst posing a threat to the welfare of occupants and potentially preventing emergency access to properties and essential infrastructure. The site may be at risk of fluvial flooding from the adjacent Back Burn.
- **Infrastructure failure:** The failure of conveyance infrastructure such as culverts or bridges could increase the risk of flooding at the site. The Back Burn is culverted beneath the unclassified road forming the west boundary to the site, and the private access road to Letham House at the south east corner of the site.

- **Overland flow:** Overland flow occurs when the infiltration capacity of the ground is exceeded in a storm event. This could result in water travelling as sheet flow overland or excess water being conveyed from one location to another via local road networks. Overland flow from surrounding land and road surfaces is a potential source of flood risk to the site.

- **Sewer flooding:** If the capacity of sewers is exceeded in an extreme event, or a blockage occurs, surcharging of the network can result in surface flooding. The local drainage network should be considered with a view to assessing flood risk to the site.

- **Groundwater:** Groundwater flooding could occur at low points on any given site, particularly if that site is next to a water feature.

Another potential flooding source, coastal flooding, has been discounted.

Fluvial flood risk

The Back Burn flows along the south boundary of the proposed development site, within an area of woodland. Review of the SEPA Flood Maps indicates that flooding associated with the Back Burn is restricted to the wooded area alongside the burn and does not extend into the site in the Medium likelihood (200yr return period) event.

No detailed topographical survey information is available at this stage to undertake a quantitative assessment of flood risk associated with the burn. Assessment of existing site levels in relation to levels along the channel of the Back Burn, has been undertaken using OS Terrain 5 data. This indicates

that existing site levels are approximately 2m above adjacent ground levels in the vicinity of the Back Burn. Based on these level differences, fluvial flood risk from the Back Burn is considered low. However, there is an approximate 2m RMS vertical error associated with the OS Terrain 5 data, and the flood risk should be reviewed when a detailed topographic survey has been carried out.

It is anticipated that a more detailed modelling study will be required to more accurately determine fluvial flood risk from the Back Burn prior to submission of a detailed planning application. Any areas of flood risk are, however, likely to be on the margins of the site.

Infrastructure failure

There are two culverts located on the Back Burn within the vicinity of the proposed development site..

In the event that either culvert blocks, water is likely to back-up until it reaches the spill level over the respective road. From the OS Terrain 5 data, the spill level at both locations appears to be significantly lower than the adjacent site levels. Therefore, flood risk associated with infrastructure failure is considered low.

It is expected that the more detailed modelling study will include an assessment of flood risk associated with the blockage of these culverts.

Overland flow

Ground levels generally fall from north to south across the site. The A1 trunk road is in a cutting to the immediate north of the proposed development site and so this will intercept

overland runoff approaching the site from the north and direct it away from the site.

Ground levels to the east and the south fall away from the site; overland runoff from these areas will be directed away from the site.

Ground on the west side of the unclassified road at the west boundary of the site also falls from north to south. Overland runoff from this area will be directed towards the Back Burn on the west side of the unclassified road.

Flood risk associated with overland runoff is therefore considered to be low.

Sewer flooding

Scottish Water asset plans have been obtained for the proposed development area. The plans indicate that there are no public surface water or combined drains within the vicinity of the proposed development site.

Flood risk associated with existing sewers is considered low.

Groundwater

The fall in ground levels across the site and elevation above the Back Burn, suggests that the site is likely to be relatively free draining and that flood risk from groundwater is low. It is expected that further assessment of flood risk from groundwater levels will be undertaken and issues dealt with on completion of a ground investigation for the proposed site.

In summary, whilst it is anticipated that a modelling study will be required to fully assess the fluvial flood risk from the Back

Burn prior to submission of a detailed planning application the likelihood of flood risk within the site is low, with any areas of flood risk are likely to be on the margins of the site.

4.3.3 Drainage and sewerage capacity

In respect to foul water discharge the nearest point of connection to the existing Scottish Water combined sewer network lies to the east of the entrance to Letham House on the B6471, West Road adjacent to the existing business park at Gateside. No other drainage is recorded as existing on the site. This 225mm diameter combined sewer is located along the southern side of West Road and flows in an west/east/ direction, prior to connecting into the existing sewer network serving the western area of Haddington.

Scottish Water Record Plans indicate the location of any known sewers within the area. These are reproduced within the accompanying Engineering Appraisal report.

There has been limited discussions with Scottish Water in respect of this submission, (following involvement over a long period of time on the Letham Mains major site), and the current situation is follows below.

A DIA for the main Letham site was commissioned in 2006 and it is understood from recent discussions that this will require to be refreshed for that site due to a number of Scottish Water design parameters changing over time. In addition, Scottish Water is coordinating the completion of a strategic DIA that will look at the overall needs of Haddington, with respect to capacity within the whole drainage network. This Strategic DIA will include the Letham Mains site together with others that are currently in the Planning process for the area.

Scottish Water have advised that further detail on this Strategic DIA is yet to emerge however they will be in contact with developers to discuss each specific site and to ensure its inclusion within the DIA.

In addition, Scottish Water have advised that they have initiated a Growth Project to determine and where necessary, increase capacity at the receiving Waste Water Treatment Works. This begins with an investigation into the available capacity at Haddington WWTW and preliminary work is already underway however, no date for completion has been intimated.

4.3.4 Utilities

Existing public utility record information was obtained from the following:

Scotia Gas Networks:

From the record drawings there is no gas supply present on the boundary of the site. However from the record drawings there appears to be gas infrastructure to the east of the site on the B6471, West Road at the junction with Gateside Road.

The main in this area varies in size therefore clarification will need to be sought from the asset owner in order to determine whether a gas supply could be brought to site. It will be required to determine whether there is sufficient supply to service the development, a suitable point of connection and the cost to provide same in order to service the development.

BT:

BT apparatus is located along the A119 frontage which forms the northern boundary of the site. It is therefore envisaged that this could service to the development

Water:

Water mains infrastructure, 4" diameter, is located along the northern boundary of the site. Scottish Water will require to clarify if there is sufficient pressure and flow in order to service the development as part of the normal next stage of site investigation.

Electricity:

An 11Kv overhead electrical supply line crosses in a south to north direction through the eastern portion of the site. The records show the overhead terminating on the northern

boundary and then continuing underground to the site of the former filling station on the B6471. This will have to be confirmed and diverted in order to facilitate development.

In summary, there has been no constraint identified at this stage to servicing new development on this site.

4.4 Accessibility

This section describes the baseline accessibility assessment to establish the existing transport provision serving the site and its surrounds. The assessment recognises the importance of both local and regional trips and that walking and cycling are main modes of transport but are also secondary modes of travel for public transport users. A full report of the assessment can be read within the "Access Strategy" accompanying this report.

An audit of existing pedestrian and cycle facilities in the vicinity of the site was undertaken together with an assessment of the walk / cycle and public transport catchment areas. These have then enabled the masterplan strategy.

4.4.1 Walking

The figure below displays a walking catchment of 1.6km from the site, also illustrating the existing local amenities within Haddington.



fig. 13: Walking Distances

The nearest existing local shops to the site are located in Haddington town centre, between a 1.6km and 2.5km walk of the site. The available amenities include a bank, foodstore, pharmacy, restaurants and bars and can be reached via continuous footway provision along the B6471 West Road. In addition, the future Sainsbury's Supermarket at Gateside will provide food retail directly adjacent to the site, which will be accessed via signalised pedestrian/cycle crossings on the B6471 West Road.

4.4.2 Cycling

"Transport Assessment and Implementation: A Guide" suggests a 30 to 40 minute cycle journey time is acceptable for a local trip, this translates to a cycle distance of approximately 8km. The following figure demonstrates that all of Haddington can easily be accessed within a 30 minute cycle ride of the site. In addition, the figure also highlights a 2.5km journey from the site, which equates to an approximate 10 minute cycle, and it can be seen that all local amenities within the town centre are within a 10 minute cycle of the site.

The National Cycle Route (NCR) 76 runs from Edinburgh to Berwick upon Tweed and can be accessed to the immediate east of the site at Gateside. NCR 76 runs from Berwick upon Tweed to Edinburgh, Stirling and St Andrews with the route on both sides of the Forth. To the west the route offers access to Longniddry railway station within an approximate 25 to 30 minute cycle of Letham West. The A199 running along the site frontage, currently benefits from advisory cycle lanes marked out on both sides of the carriageway. The cycle lanes run between Haddington and Tranent in the west.

The development of this site can help to deliver ELC's aspirations for a continuous off-road shared use route running along the B6471 West Road and A199. The delivery of this route along the site frontage would offer a continuous route to Haddington town centre.

Further cycling access points can be provided on the western boundary of the site, linking into the local road serving Letham small holdings.



fig. 14: Cycle Network

4.4.3 Public transport

The site is very well located in relation to the local public transport network. B6471 West Road is the main bus corridor between Haddington and Edinburgh with frequent bus services available. According to the 2011 Census results, public transport journeys account for on average 9% of travel to work / study trips by Haddington residents.

Bus provision

The nearest bus stops serving the site are located on B6471 West Road and A199 and are within 400metres of the majority of the site. The following figure illustrates the location of the site in relation to existing and future bus stop provision. All bus stops in the vicinity of the site are equipped with a bus stop flag and timetable information and some also benefit from shelters.

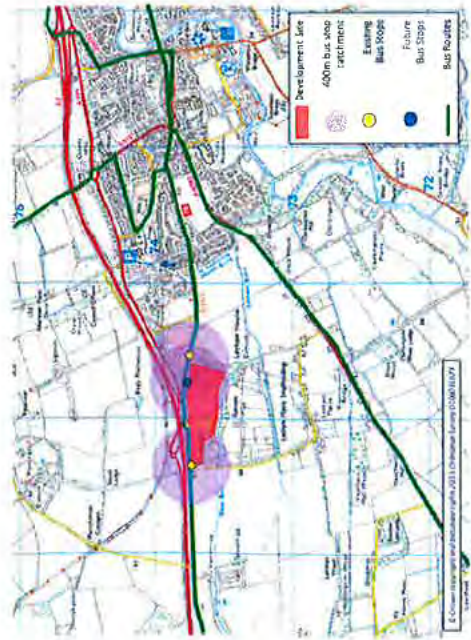


fig. 15: Bus Provision

First Bus is the main operator in Haddington with Perryman and Prentice Coaches also offering bus services. The weekday peak hour combined bus service frequency along both West Road and A199 is currently 3 to 5 buses per hour in one direction. Bus services accessible on B6741 West Road or A199 provide direct public transport access to Haddington town centre, Dunbar, Tranent, North Berwick and further afield to Edinburgh.

It should be noted that development of the site offers the opportunity for bus operators to increase patronage, by introducing bus service provision through the heart of the site where they currently stop on an open stretch of undeveloped road frontage.

Rail provision

Haddington is not served directly by rail, nonetheless, Longniddry railway station is located approximately 8km northwest of the development site. National Cycle Route (NCR) 76 can be used to access the railway station from the site by bicycle. The NCR 76 runs close to the station entrance; cycle facilities are provided in the station car park on the north side and waiting facilities are provided on both platforms. Car parking is also available for approximately 73 vehicles.

The peak rail service frequency is half hourly in the morning peak and Saturdays, and with an hourly evening peak and Sunday daytime frequency.

4.4.4 Existing road network

B6741 West Road

The B6471 West Road is of single carriageway construction and is currently subject to a 60mph speed restriction as it fronts the site. As part of the adjacent Sainsbury's proposals, the 30mph speed limit will extend as far as the Oaktree junction to the west. The road facilitates access between Haddington town centre and the A1 and A199; the B6471 West Road is also a major bus corridor. The B6471 West Road will provide main vehicle access to a number of committed and allocated developments in the west of Haddington. This includes the three arm signalised junction proposed as part of the adjacent Sainsbury's development, which as part of the OTH-H8 proposals could be upgraded to form a fourth arm serving the site.

A199

The former A1, now known as the A199, is connected to the B6471 West Road and A1 via the Oaktree roundabout. As it passes the site the A199 is subject to a 60mph speed limit. On-road cycle routes are provided on both sides of the carriageway. To the West the A199 provides access to other towns and villages in East Lothian including Macmerry and Tranent. Based on the current road network and guidelines a second vehicle access can be achieved on the A199 to serve site OTH-H8.

A1(T)

From OTH-H8, the A1(T) is accessed via the Oaktree junction. The A1(T) is the main trunk road running between the north of England and Edinburgh and provides a strategic road link

between Haddington and some of the larger towns and villages throughout East Lothian such as Gullane, North Berwick and Dunbar. The A1(T) is of dual carriageway construction and is subject to the national speed limit.

Unclassified Road

(Access to Letham small holdings)

The unclassified road, forming the western boundary of OTH-H8, is of single carriageway construction and is subject to the national speed limit along the site frontage. This road provides a vehicle link between the A199 and A6093 Pencaitland Road, also providing access to a number of small holdings and Backburn Wood. The route is signposted as being unsuitable for Heavy Goods Vehicles and it is likely that it is used mainly by those who live at this location or who are local to the area. As a result, observations would suggest that this route is very lightly trafficked.

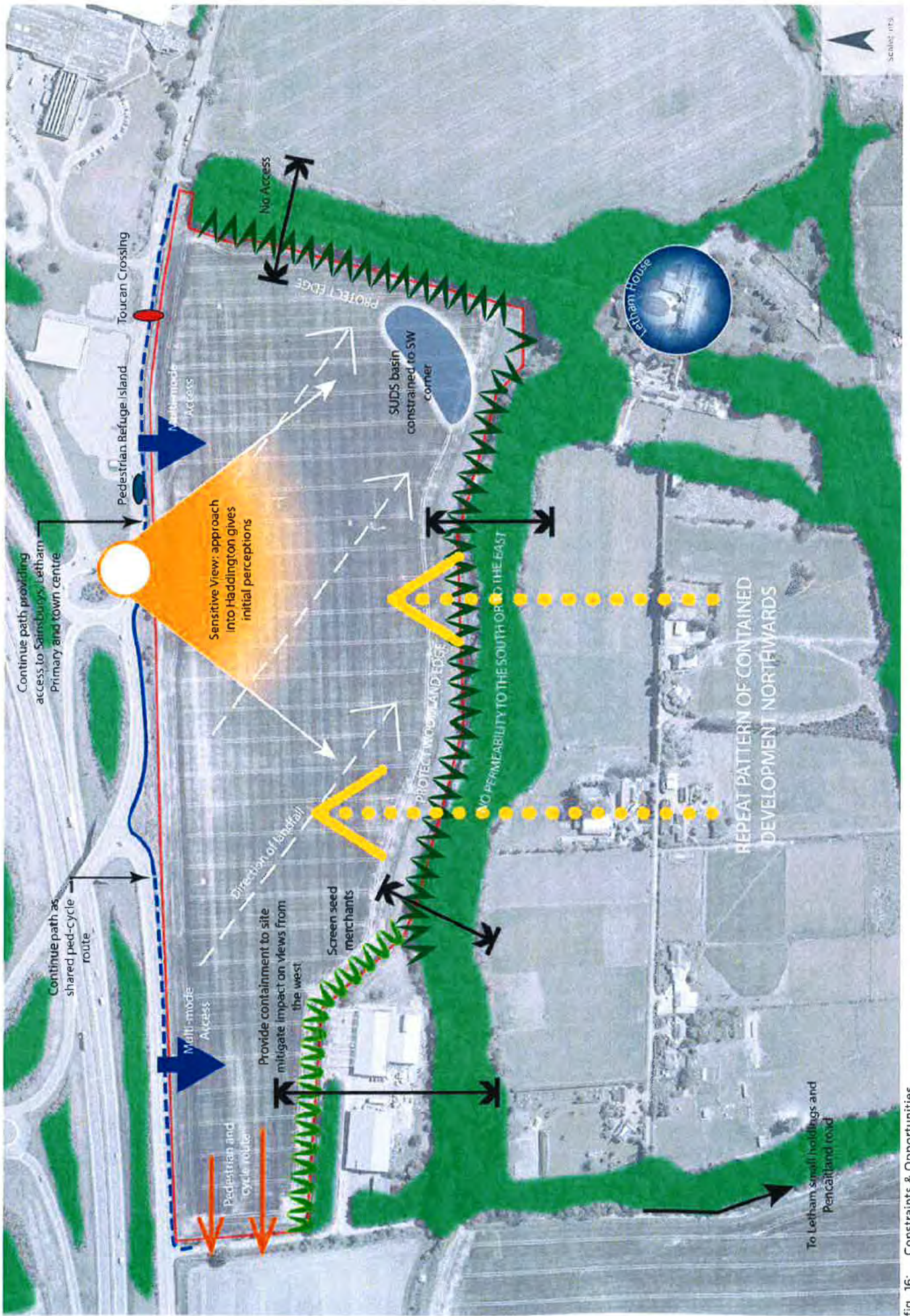


fig. 16: Constraints & Opportunities

5 Strategy

5.1 Constraints & Opportunities

The site is greenfield, with a history of agricultural use, is of a good topography for building, has no servicing or drainage constraints that cannot be addressed and it is well located in relation to the strategic network.

Constraints to this site coming forward are timing, view sensitivity, and physical and visual integration with Haddington.

To examine timing first. By 2024, when the currently allocated and "Preferred" development land has been built out, there will be a supermarket directly across the road from the site, a primary school and commercial facilities within less than 1.2 km away for most of the site, and facilities within easy access at Gateside East. This part of Haddington will become a self-sustaining suburb to the main town centre as well as becoming more urbanised as a result. In advance of reaching that stage, and in the interests of good planning, how Haddington grows sustainably beyond that should be considered now. This site will be well-placed to capitalise on those changes.

Regarding view sensitivity, site analysis determined that there was no view to the site from the south and east; this is down to the screening by mature woodland. There are views from the west but these are medium range, not long range and could be mitigated through additional planting. The most sensitive of the views is from the north; not from over the A1, which was checked, but from short range viewing such as along the boundary or, most importantly from arrival into Haddington at Oak Tree roundabout where there is currently an open view across this field to the mature woods behind.

Given however, that West Road will become increasingly urbanised westwards, especially with the construction of the consented Sainsbury that will place a filling station on the corner of the site frontage, plus the associated corporate signage, then perhaps rather than seeing this as a constraint it should be viewed as an opportunity to create a positive new approach into Haddington instead of leaving this to become a slowly fragmented piece of urban edge as change occurs around the edges.

Physical and visual integration with Haddington is harder to achieve; the woodland that provides positive benefit in terms of containment also constrains accessibility to the south and east. There is a partial footpath to the north and it's a Council priority to continue this path along the whole of the northern edge of the site together with cycling opportunities. Whilst the site offers excellent access to the strategic network including for those catching buses or driving to Longniddry station the site focus for access is along the northern edge for all modes and for pedestrians and cyclists on the western boundary.

However given the considerations outlined above, and the changing situation within west Haddington over the next few years there will be many new facilities local to this site that will be best accessed along that road. The focus for movement will be to these new places, as well as to Knox Academy and the town centre- all of which will be well-linked to the site through ensuring a well-connected masterplan, plenty of access opportunities onto the A199 and West Road where possible, and appropriate shared pedestrian and cycle access along the northern edge leading directly eastwards.

There is a very distinctive existing landscape pattern to the south with mature woodland containing development; there is an opportunity to continue that pattern northwards and in doing so create a robust new western edge for Haddington that will be more easily defensible.

5.2 The Wider Picture

The other two alternative sites under consideration also have similar sensitivities. Site H6 is closer to the existing town centre than sites OTH-H7 and OTH-H8 however is highly visible and with severe access constraints. There may be flooding issues as it is directly adjacent to the Tyne, it also has the potential to impact on the nearby Historic Garden and Designed Landscape where East Lothian is currently considering tightening up their policy regarding this (as set out within the Monitoring Statement).

Site OTH-H7 offers larger growth opportunities with a similar distance to the town centre as OTH-H8. Both sites will lead to the loss of agricultural land. Both sites are outwith the current settlement boundary of Haddington. The southern site has issues on accessibility -the site is not within 400m of a bus stop. It is not within 800m of a railway station. There are no services and facilities within 1600m. Even when additional development takes place to the north along West Road, and within Letham Mains, these will not be as readily accessed from OTH-H7 as H8.

Site OTH_H7 is not within the proposed Countryside Around Town (CAT) policy area although it is close to the Clerkington non-inventory designed landscape which is likely to gain increased policy protection within the emerging Local Development Plan. Without further background information or draft Supplementary Guidance on the methodology and level of protection for the emerging protective landscape designations within East Lothian then Council reasoning behind this decision (not to include the south-west within the CAT) cannot be reviewed.

However through establishing a landscape framework at site OTH-H8 which continues the pattern already established around the distinctive Letham smallholdings a robust edge can be established on the western edge of the settlement which provides a clear boundary between the semi -urban and rural landscape meaning that the proposed policy would be better drawn along the western edge of the site.

Whilst site OTH-H7 offers a potential opportunity for longer term growth, in the medium term development of site OTH-H8 will allow a defensible western edge to be drawn to Haddington. It doesn't impinge on the historic landscape or urban area. It will also be close to several proposed (to be built in the shorter term) community and commercial facilities.

The most important aspects will therefore be how the site is developed in terms of its character on the urban edge, and the perception from Oak Tree junction.

A concept which would meet some of these issues would be to create a new development that is unique in character to East Lothian but which borrows from its recent history with the sense of containment around the smallholdings and looks to the Netherlands for reference in achieving development within woodland and appearing liberal on space yet still providing a high level of housing.

The proposal is therefore to offer something more unique to Haddington and create a garden suburb, enclosed within a woodland edge and designed with a generous provision of greenspace at its heart providing a focus to what will be a

cluster of development surrounded by trees. Potential links and use of resources could be maximised and, appropriate to a rural county town like Haddington, creating a new approach to the town through creative use of planting.

Through this strategy, the concerns raised by the Council can be mitigated. Design proposals are more fully described and illustrated within the next section.

Principles for development

- Address visual exposure through continuing existing woodland pattern northwards
- The character of Haddington will change considerably by 2024; make positive choices now in addressing how the new approach can be properly managed
- Local facilities will be readily available; facilitate through expanding existing links
- Continuing the existing landscape framework; clear divisions between rural and urban can be established.



fig. 17: The Wider Picture



fig. 18: Development framework

6 Development

6.1 Development Framework

Figure 18 shows the proposed Development Framework for site OTH-H8. Maximum use of available access has been made with a connected street from the A199 leading to West Road. The Access Appraisal identifies that this is likely to be attractive to bus operators and this street can be designed accordingly. Provision of greenspace is central to this proposal and a park, allotment and pitches are all co-located but with plenty of active frontage; all open space is overlooked. To the south-east the SUDS pond would be located in the most logical position and a planted swale will also aid drainage and is located along the southern edge.

Feature planting on the northern edge would signal arrival at Haddington and be seen against a backdrop of woodland. Development would be mainly screened behind the trees. Refer to the indicative montage (Figure 19) showing how this could be realised.

Streets beyond the connected bus link would all be shared space, allowing opportunity for bio-retention and safe play spaces for children. These would also be linked together as far as possible but should be designed for very low speeds.

The character will be of an attractive, safe, green, high quality living environment that will become a desirable place to stay within Haddington. Other opportunities for a development such as this will be the provision of a local district heat network.

Capacity has not been determined as this will be a design-led process for a development appropriate to the edge of settlement. There is opportunity for a mix of density with higher density along the bus route and around the public spaces.



Fig. 19: Montage showing feature planting

6.2 Landscape Framework

The design of the landscape and how development sits within a landscape framework are fundamental to this design strategy. The accompanying figure shows the different elements and demonstrates how they are connected in order to form an effective habitat network which is further enhanced by linking with the wider landscape.

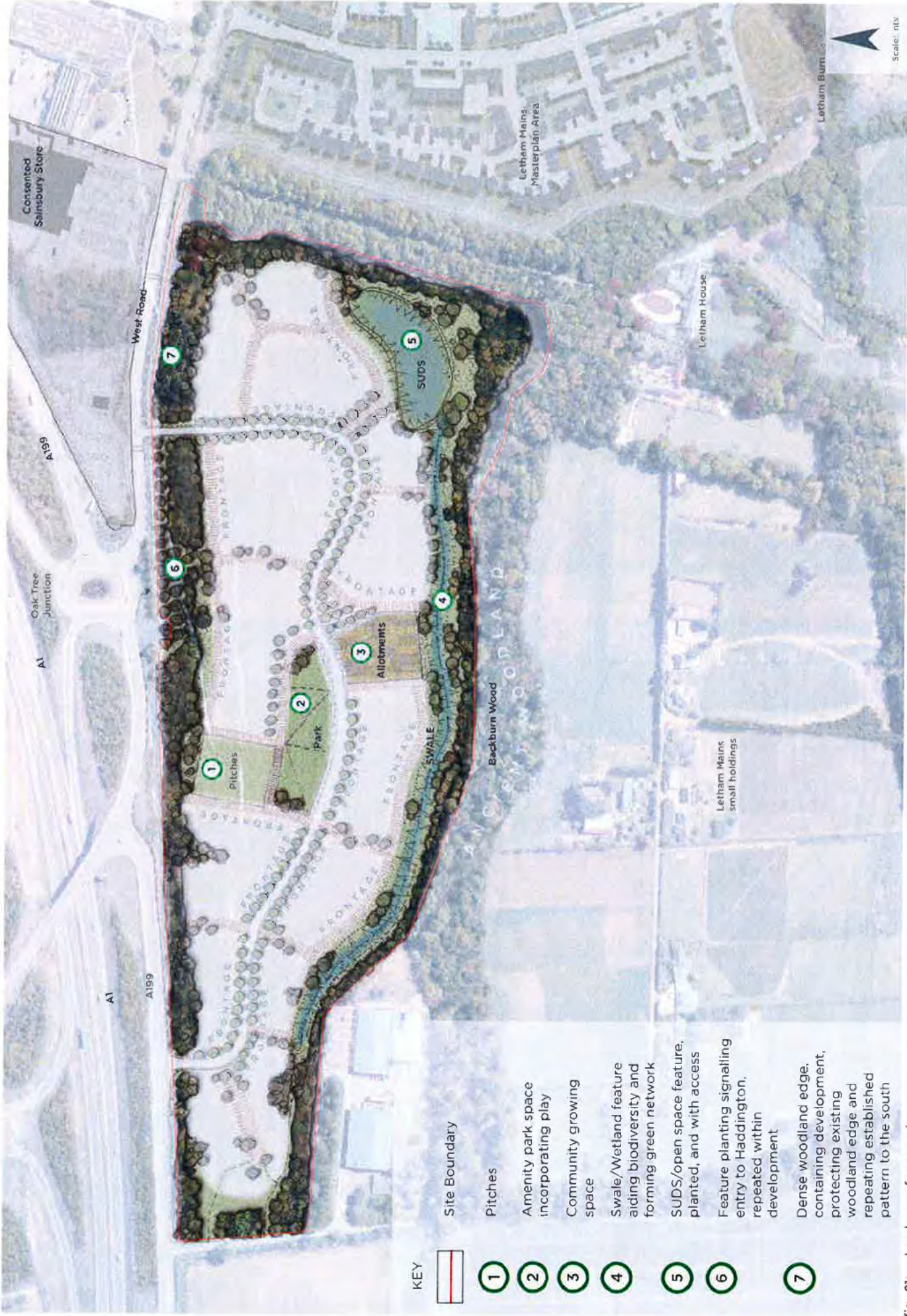
Council comments on how guidelines regarding SUDS adoption are influencing appearance and bio-diversity opportunities are noted and given this is a medium term prospect there is time to explore alternative means of stewardship. The aim is to create a community feel within this development and

creating a community trust who maintain the swale and pond features could give rise to the creation of spaces which are much richer in terms of quality of space and could also allow public access to the edge. This has been achieved in many other examples of development throughout the UK and is likely to become more common in the future.

Taking landscape "first" as an approach which enriches the living experience in West Letham as can be seen on the montage, Figure 20, which indicatively illustrates the central green area.



fig. 20: Montage showing central green space



KEY



Site Boundary



Pitches



Amenity park space incorporating play



Community growing space



Swale/Wetland feature aiding biodiversity and forming green network



SUDS/open space feature, planted, and with access



Feature planting signalling entry to Haddington, repeated within development



Dense woodland edge, containing development, protecting existing woodland edge and repeating established pattern to the south

fig. 21: Landscape framework



- KEY**
- Site Boundary
 - Existing Road Network
 - Principle Route (including Bus Access)
 - Shared Cycle/Footpaths
 - Homezone/Shared Surface
 - Bus Stops
 - Pedestrian crossing with refuge
 - Tactile Crossing

fig. 22: Proposed Connections

6.3 Access and connectivity

6.3.1 Overview

At this stage, the design proposals are at an early stage. In the future a more detailed Masterplan will support a Movement Hierarchy which acknowledges the principles of Designing Streets, and specifically will:

- Designate streets where the principal function is for vehicular movement;
- Provide suitable safe and direct crossing points for pedestrian / cyclist movements;
- Provide a choice of pedestrian/cycle routes with traffic free and on-road facilities;
- Create direct links which follow key pedestrian desire lines;
- Create new links to future neighbouring developments and
- Ensure the right balance between the movement and place function of the streets.

Key principles or development of the site can, however, be established at the outset as set out below.

6.3.2 Walking and cycling

As part of their longer term aspirations, East Lothian Council (ELC) wishes to introduce a continuous shared use walk/cycle route along the southern side of B6471 West Road and A199 between Haddington and Macmerry, where possible. As part of the committed Sainsbury's and Letham Mains proposals, a continuous off road route will be available between Haddington and the A199 to the immediate west of the Oaktree junction.

As part of the delivery of OTH-H8, there is an opportunity to further extend this route along the A199 and the northern site frontage, providing a continuous foot/cycle path from the site to Haddington town centre.

As part of the more detailed masterplanning direct pedestrian and cycle routes will be provided within the site to link with access points on the site boundary.

6.3.3 Vehicle access

A site visit was undertaken in January 2015 to inform the location and indicative design of the proposed access junctions. Reference was also made to the relevant ELC design guidelines and Designing Streets and cognisance taken of the access proposals associated with the adjacent allocated and committed developments, namely Sainsbury's, Letham Mains and the East Gateside residential development.

As indicated in the MIR, it is anticipated that OTH-H8 would have a medium build density applied with capacity for up to 350 residential units. Taking account of the relevant ELC standards, Designing Streets and surrounding access proposals, it is considered that two access points can be achieved within the available road space and these are described overleaf.

Access 1

It is proposed that Access 1 is located on the A199 approximately 135metres west of its junction with the Oaktree roundabout. The final form of the junction would be subject to a detailed capacity assessment, however it is anticipated that a simple three arm priority junction could be achieved based upon the following:

- Visibility splays of 4.5m by 90m and 9m by 120m (speed limit dependent), can be achieved;
- The junction spacing of 100m required by ELC on local distributor roads can be achieved; and
- In association with the vehicle access on the A199, a foot/cycle path can be achieved along the site frontage and the south side of the A199.

Figure 23 provides an indicative sketch of the junction location and its layout taking account of the ELC development guidance requirements. The detailed design of the junction will be the subject of any future Transport Assessment for the site.



fig. 23: Access 1

Access 2

As part of the Sainsbury's proposals, a 3-arm signalised junction will be constructed on the B6471 West Road and directly opposite the site frontage. It is considered that this junction can be upgraded to a 4-arm signalised junction, subject to a detailed capacity assessment at the appropriate stage. The benefits associated with a junction being provided in this location are:

- A site access in this location will make use of an existing / committed junction via upgrade; and
- Good pedestrian/cycle crossing facilities in association with the vehicle access and giving direct and safe access to the Sainsbury's development and onwards to the Letham Mains primary school.

Figure 24 below provides an indicative sketch of the junction location and the approved layout of the 3 arm signalised junction which would require upgrade to a 4-arm signalised cross road to accommodate the site access.



fig. 24: Access 2

The provision of two vehicle access points at these locations allows for the development of a main spine road running through the site. This creates a very good opportunity for the introduction of onsite bus service provision.

6.3.4 Bus provision

Currently the main bus routes running between Edinburgh and Haddington run along the A199 and B6471 West Road past the site.

As there is no existing development on the section of route where there is site frontage, there is an attractive opportunity for bus operators to divert into the site which would increase patronage levels without large deviation or disruption to existing routes.

The "Proposed Connections" diagram highlights the connection points in context.

6.4 Drainage

6.4.1 General

The general piped drainage system for the main development area will be designed to cater for the 200 year storm event with 10% increased allowance for Climate change for the site in accordance with Sewers for Scotland 2nd Edition. Scottish Water requirements require that no flooding occurs in the proposed network for a 1 in 30 year storm event.

Attenuation storage and runoff volume will be designed to cater for the 1 in 200 year critical event with 10% increased allowance for Climate change.

Discharges from the development are limited not to exceed the pre-development run-off value by means of a flow control chamber. Attenuation will be provided by means of a detention basin located in the south east corner of the site.

Summary calculations for surface and foul networks have been included within the accompanying Engineering Appraisal report. At the time of application for drainage Technical Approval, detailed calculations will be submitted to Scottish Water.

6.4.2 SUDS

The proposed development could amount up to 350 dwellings depending on future capacity assessment and associated infrastructure. Therefore in accordance with SEPA Regulatory Method (WAT-RM-08), two levels of treatment is recommended.

Having given consideration to the design constraints and SUDS options available for the site a SUDS solution for the site proposed, is as follows:-

The private non-adopted parking should have permeable pavement surfacing thereby treating the surface water run-off. (This will provide two levels of treatment to surface water run-off).

The residential properties are to have permeable pavement surfaces within the private driveways thereby treating run-off from roofs and parking bays. (This will provide two levels of treatment to surface water run-off and one level of treatment to roof run-off)

"Bio Retention Hydro Filterra" tree features are proposed to treat surface run off for the adoptable road and footways at the development. (Recent advices from Hydro International and SEPA confirm that this will provide two levels of treatment)

Attenuation will be provided such that it does not exceed the pre-development run off value and flow will be controlled by means of flow control device.

6.4.3 Foul drainage

The foul water from the development is proposed to discharge to a combined sewer manhole number 5700, as referenced on Scottish Water's sewer record, located situated on the B6471, West Road to the north-east of the development.

Consultation will be required with Scottish Water, to ensure that the existing sewer network and existing waste water treatment works have adequate capacity to accommodate the predicted level of flow.

6.4.4 Utilities

The existing overhead power supply will be diverted and could be located underneath the street network.

Opportunities for providing a local district heat network should be explored through the design and capacity testing stages.

7 Summary

Site OTH-H8 is considered to be a good option for allocation in the medium to long-term, once current proposed and existing allocations in the west of Haddington have been built out.

Adopting a landscape-led concept will create a scheme which fits well within its context, creates a robust western edge to the expanded settlement, effectively rounds off the settlement allowing opportunity to create a proper arrival point. It will offer housing choice within an alternative style of development that puts greenspace and quality of life first.

The Council has raised concerns over the development of the site which have largely been addressed through this submission. Many of these issues are common to any other options for future growth around Haddington and it is clear that once the current, more obvious sites are built out then a more complex balancing process is required in choosing where to go next.

Site OTH-H8 will capitalise on the benefits arising from development at Letham Mains, East Gateside and at Oaktree junction allowing for sustainable living and should be considered as an logical candidate for future allocation.



For further details contact:

Collier International | 39 George Street | Edinburgh | EH2 2HN

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CONTACT DETAILS

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24th Oct. 2016.

Dear Sir / Madam,

I wish to request SALTCOATS (NK7) FENTON GAIT (NK8) and FENTON GAIT SOUTH (NK9) to be removed from the proposed Local Development Plan as sites for housing development. In general the cumulative effect of developing these sites plus the Fire Service Station site ^{in Gullane} has not been properly thought through and raises the question of the agenda behind their inclusion. In my opinion it is the role of the Planning Department to be objective in these matters and based on the evidence available this is clearly not the case.

My objections are centred on 3 main areas ① My previous submission to E.L.C. in respect of Cala Homes planning application for Saltcoats Field and Fenton Gait. ② The conclusions contained in the report of the Public Inquiry by Ian G. Lumsden, endorsed by E.L.C. SEIRU, File Reference IQD/21210/1 Chapter 9.4: Housing in Gullane (Details enclosed) ③ Report by Transportation Planning Engineer, E.L.C. on Saltcoats Field, Fenton Gait East, Freedom of Information Request (Details enclosed).

Yours faithfully,

listed building and the appearance of the designed landscape. I am aware of the comments on this matter made in 1998 by Historic Scotland, but I do not agree with the conclusions drawn. In my view, the development of housing on the site would materially alter the appearance and character of the village. I also believe that the housing would be prominent in views to and from Greywalls and in my opinion it would be detrimental to the setting of an 'A' listed building and the appearance of the associated designed landscape. I do not believe that the inclusion of landscaping measures would overcome these concerns.

9.4.14 In addition, given my reservation about the very low density of development suggested, I believe that it is perfectly possible that significantly more than 50 houses could be built on the site. In these circumstances, the proposal would also fail to meet the criterion regarding 'local' housing sites being small scale. As the council has noted, the Joint Structure Plan Liaison Committee has indicated that a 'local' housing site in the context of Policy HOU8 should contain no more than 10% of the total number of existing households in a settlement, up to a maximum of 50 new houses. While I acknowledge that the Joint Committee's decision does not have statutory basis, it is in my view a reasonable interpretation of how the term 'local' should be applied in the context of Policy HOU8. Taking all the above matters into consideration, I find that the allocation of the site for housing would not satisfy the criterion regarding developments being small scale and in keeping with the character of the settlement. As proposals have to meet all the criteria, the development of the site would therefore be contrary to Policy HOU8.

9.4.15 I note that the objector has also indicated that the site could assist in meeting the local housing needs of Gullane. However, I do not believe that there is any recognition in either the structure plan or the local plan that the housing needs of each individual settlement have to be addressed within that settlement. The approach adopted in the development plan is that housing need and choice are matters that should be dealt with across the wider housing market area and not necessarily at the settlement level. I consider that this approach is consistent with the guidance and advice in SPP3 and PAN 38 on the issue. In conclusion, I find that the allocation of the site for housing is not required to meet the requirements of the structure plan and that its identification as a 'local' housing proposal cannot be justified under the terms of Policy HOU8. I do not believe that there are any other material considerations in this case which would merit allocating the site for housing.

RECOMMENDATION

9.4.16 I recommend that no change be made to the finalised local plan in response to this objection.

Omission of housing site: Land to the south of the A198 at Gullane

Reference: Hart Estates Ltd, Objection H143 (Written Submissions)

BASIS OF THE OBJECTION

9.4.17 This objection concerns the allocation of an area of land lying to the south of the A198 at Gullane under Policy DC1, Development in the Countryside and Undeveloped Coast. The objector was of the view that the land was suitable for residential use, including affordable housing, and that this could be justified in terms of the criteria in structure plan Policy HOU8 (Development on Greenfield Land).

CASE FOR THE OBJECTOR

9.4.18 It was explained that the objection site, which extended to some 3.5ha, was on the eastern edge of Gullane just to the south of the A198. The land was currently in agricultural use and it was bounded to the west by the existing residential developments known as Muirfield Steading and Fentoun Gait. There were further agricultural fields to the east and south of the site. The objector proposed to develop the site with approximately 50 houses which would be served with accesses from the A198 and from Fentoun Gait. It was submitted that the site was well located relative to the facilities of the village. In the objector's opinion, the eastern edge of the village was exceptionally weak due to the lack of any tree planting or landscaping. It was considered that the development of the site would provide an opportunity to improve the appearance of this important entry point to the village with the provision of an area of structural planting. Given the acknowledged shortage of affordable housing in the village it was proposed that up to 30% of the new houses to be provided on the site would be in this category.

9.4.19 The objector believed that the council had placed too great a reliance on the housing output from a few strategic sites to maintain the effective 5-year land supply. Particular reference was made to the site at Blindwells, which it was considered had problems associated with its deliverability. In order to meet the guidance in SPP3: Planning for Housing it was submitted that a range of smaller sites in a variety of different locations should be made available in the local plan to provide a range of housing opportunities and increase choice. It was noted that the local plan had identified no new sites in Gullane to meet local needs and that overall there were very few sites in the smaller settlements and outwith the core development areas. It was considered that the objection site was free of development constraints and met the other criteria in PAN 38 regarding effectiveness.

9.4.20 The objector sought the re-allocation of the land from 'countryside' to residential use in the local plan. It was believed that the failure to identify any additional housing sites in Gullane meant that local housing needs had not been addressed. The allocation of the objection site for housing would increase choice and make a small but nevertheless significant contribution to the effective housing land supply. It was considered that the site was well located relative to local facilities and access to public transport routes. In addition, it was noted that the objection sought the allocation of the site for approximately 50 houses. Given that the local plan has identified sites with a similar capacity to this in other settlements, the objector believed that the proposal should be considered to be 'small scale' and in keeping with the character of the village. Taking all the above matters into account, it was submitted that the allocation of the site for housing could be justified in terms of the criteria in Policy HOU8 (Development on Greenfield Land) in the structure plan.

RESPONSE OF EAST LOTHIAN COUNCIL

9.4.21 The council indicated that the objection site was located to the south of the A198 and to the east of the housing at Muirfield Steading and Fentoun Gait. The site was open agricultural land which was of prime quality. The finalised local plan included the land under Policy DC1 (Development in the Countryside and Undeveloped Coast). It was indicated that the Scottish Fire Training School (SFSTS) was on the west side of West Fentoun Road, opposite Muirfield Steading. Policy INF4 of the finalised plan, which deals with the Scottish Fire Service Training School at Gullane, recognised the necessary training activities undertaken at the SFSTS. The council has indicated that it would ensure that any adverse environmental impacts arising from operations at the SFSTS will be minimised while at the same time having regard to the impact of development proposals on the legitimate operational requirements of the facility.

9.4.22 It was noted that the structure plan emphasised that the successful implementation of its development strategy would depend on new development being restrained outwith the identified Core Development Areas. The plan went on to indicate that the villages and small settlements in East Lothian, such as Gullane, were within an area of restraint. The council submitted that there was no structure plan requirement for additional land for housing to be identified in Gullane. Paragraph 3.23 in the plan endorsed this approach in respect of development on 'greenfield' sites in general, although it did make provision for certain exceptions under Policy HOU8. The policy presumed against new housing development on 'greenfield' sites other than to meet strategic requirements. Gullane was not an area within which such strategic requirements required to be met. However, the policy allowed for exceptions to be identified through the local plan process and these may include small sites in villages where development was needed to support local services and facilities. However, any such sites must be small-scale and in keeping with the character of the settlement or the local area; outwith the green belt; and, any required infrastructure must be either committed or funded by the developer.

9.4.23 In addition, structure plan Policy ENV1(D) (Regional and Local Natural and Built Environment Interests) provided that development affecting prime agricultural land would only be permitted where it could be demonstrated that (a) the objectives and overall integrity of the designated area would not be compromised, or (b) the social or economic benefits to be gained outweighed the conservation or other interest of the site.

9.4.24 The council noted that at the previous local plan inquiry, objections were considered into the non-allocation of the objection site for housing. The Reporter's recommendation on the matter was that no change should be made to the local plan. It was concluded that housing on this land would not be small-scale in relation to a settlement of the size of Gullane. It was also indicated that providing an improved eastern boundary to the objection site through allowing further new development would be at the expense of extending development almost 150 metres into a wide, level and open landscape. The Reporter therefore concluded that this would be to the detriment of the character and landscape setting of the village when viewed from the A198 and from the south of the village.

9.4.25 In terms of the present objection, the council submitted that that the previous recommendation and the reasoning behind it remained relevant. It continued to be the council's view that housing on the objection site would detract from the landscape setting and character of this part of the village. In addition, with a capacity of approximately 80 houses, it could not be described as small-scale, thereby being inconsistent with the Structure Plan

Joint Liaison Committee's agreed definition of small-scale, i.e. a maximum total allocation under structure plan Policy HOU8 of 10% of the existing number of households in a village up to a maximum of 50 houses. The council therefore submitted that development on the objection site would not be in keeping with the character of the settlement here and therefore would not pass criterion (a) of structure plan Policy HOU8.

CONCLUSIONS

9.4.26 This objection concerns the allocation in the finalised local plan of a 3.5ha site on the eastern edge of Gullane and to the south of the A198 under Policy DC1 (Development in the Countryside and Undeveloped Coast). The objector would wish the site to be included within the village boundary and allocated for residential use. I note that in both the currently adopted local plan and the finalised local plan the objection site is clearly identified as being outwith the defined settlement boundary of Gullane and in the 'countryside'. In my view, the site is quite distinct from the adjacent residential areas to the west and does not form part of the built-up area of the village. I also note that the development of the site for housing would result in the loss of a significant area of prime quality agricultural land. In these circumstances, I consider that housing on the objection site would represent peripheral 'greenfield' development that would lead to Gullane being extended in an eastern direction into an open agricultural field. In the first instance, the objection must therefore be considered against the relevant policies of the structure plan.

9.4.27 On this matter, I note that one of the key objectives of the structure plan is to ensure that where possible brownfield land should be developed in preference to 'greenfield' sites. In addition, it is made clear that the natural and historic environment should be protected from inappropriate or damaging development. In pursuit of these objectives, the structure plan's settlement strategy is to focus development on sites within settlements, while recognising that in order to satisfy the strategic housing land requirements some development will have to take place on 'greenfield' sites. Accordingly, the structure plan directs most new development to 15 identified 'Core Development Areas', 6 of which are within East Lothian. The plan also emphasises that in order for the development strategy to be successful it will be necessary to restrain new housing outwith the existing built-up areas and the 'core development areas'. The strategy of restraint is justified on the grounds that environmental assets need to be protected; the viability of public transport services has to be ensured; and, the optimum use must be made of existing and planned infrastructure. In terms of the structure plan, Gullane and the objection site are clearly outwith any core development area and within an area of 'restraint'.

9.4.28 Consequently, this objection has to be assessed against Policy HOU8 in the structure plan. The policy states that there is a presumption against new housing development on greenfield sites other than those which are in the established land supply (as set out in Policy HOU1) or those identified to meet the plan's strategic housing land requirements (as covered by Policy HOU3). It also indicates that any exceptions to this general approach will be restricted to proposals identified through local plans, which must be small scale and in keeping with the character of the settlement as well as satisfying the other criteria set out in the policy. The supporting text to HOU8 noted that such exceptions may include small sites in settlements where development was needed to support local services and facilities. As indicated above the objection site is not within a 'core development area' and it does not form part of the established housing land supply. Its release is not therefore required to meet the

strategic housing requirements set out in structure plan Policy HOU3. Consequently, there is no need to release the objection site to meet the requirements of the structure plan.

9.4.29 I note that in support of the objection it has been indicated that the council has placed too great a reliance on the housing output from a limited number of large strategic sites and that there may be difficulties in the future in ensuring that this output is delivered. However, no substantive evidence has been provided in support of this assertion to seriously call into question the effectiveness of the housing land supply identified in the local plan. I am also aware that the council has indicated that there is a broad measure of agreement with the housebuilders over the effectiveness of the sites which are included in the Annual Housing Land Audit process. On the basis of the evidence available to me, I am not therefore persuaded that there is a shortfall or any need for the local plan to identify additional housing sites to comply with the structure plan. As indicated above, Policy HOU8 states that there is a presumption against new housing on 'greenfield' sites other than those required to meet the strategic housing requirements. As the objector's proposal is not needed to satisfy this requirement, the presumption against the development of the site for residential purposes clearly applies. The structure plan also makes it clear that it is a matter for councils through the local plan process to decide whether or not it is appropriate or necessary to identify additional housing sites beyond those required by the structure plan. The council therefore has discretion to allocate additional 'local' housing sites, such as the objection site, but there is no structure plan requirement to do so.

9.4.30 Dealing with the first criterion in Policy HOU8, this requires proposals to be small scale and in keeping with the character of the area. In terms of the objection site, I note that it has been indicated that the site, which extends to some 3.5ha, would accommodate approximately 50 houses. However, in relation to the provisions of Policy DP3 (Housing Density) in the finalised local plan, which requires all new strategic and local housing sites to achieve a minimum average density of 25 dwellings per hectare (gross), this is a relatively low density of development. In my view, if the site was to be allocated for residential use the total number of house on the site would be likely to exceed 50. I base this view on the fact that the council through the local plan is attempting to move away from a situation where sites were being developed to provide individual houses on relatively large plots. The local plan is now seeking to achieve more sustainable forms of development involving higher density developments which make more efficient use of the land.

9.4.31 The objector's suggestion that a comparatively low density scheme would be appropriate for the site would not be consistent with this approach or the terms of Policy DP3. If, in line with this policy, more than 50 houses were to be erected on the site, the proposal would not comply with the criterion regarding 'local' housing sites being small scale. As the council has noted, the Joint Structure Plan Liaison Committee has indicated that a 'local' housing site in the context of Policy HOU8 should contain no more than 10% of the total number of existing households in a settlement, up to a maximum of 50 new houses. While I acknowledge that the Joint Committee's decision does not have statutory basis, it is in my view a reasonable interpretation of how the term 'local' should be applied in the context of Policy HOU8.

9.4.32 I also have concerns about extending the limit of built development in the village eastwards by some 150 metres along the A198 into a large, open and generally flat agricultural field. In my opinion, such a development would have an adverse impact on the

appearance and character of the eastern part of the settlement, particularly when viewed from the A198 and the south. I appreciate that the objector considers that the existing eastern edge of the village is weak and detracts from its setting. However, I am not persuaded that the appearance of the eastern edge of the village is so unacceptable that it warrants the release of a 3.5ha site for housing and the provision of a tree belt to improve the situation. Taking all the above matters into consideration, I find that the allocation of the site for housing would not satisfy the criterion regarding developments being small scale and in keeping with the character of the settlement. As proposals have to meet all the criteria, the development on the site would therefore be contrary to Policy HOU8. Furthermore, given that there is no need for additional land to be identified to meet the strategic housing requirements and I do not believe that there would be any over-riding social or economic benefits arising from a residential development, the loss of 3.5ha of prime quality agricultural land would also be contrary to Policy ENV1(D) in the structure plan.

9.4.33 I am also aware that the objector has indicated that the site could assist in meeting the local housing needs of Gullane. However, I do not believe that there is any recognition in either the structure plan or the local plan that the housing needs of each individual settlement have to be addressed within that settlement. The approach adopted in the development plan is that housing need and choice should be dealt with across the wider housing market area and not necessarily at the settlement level. I consider that this approach is consistent with the guidance and advice in SPP3 and PAN 38 on the issue. Lastly, I note that the objector has indicated the proposed housing would include up to 30 affordable housing units as part of the overall development. However, I consider that while the provision of affordable housing is a desirable objective the location of such units should be related to the development strategy set out in the structure and local plans. I do not consider that the fact that part of the objection site could be given over to affordable housing provides an adequate justification for the allocation of a site that does not comply with the other policy requirements in the development plan.

9.4.34 In conclusion, I find that the allocation of the site for housing is not required to meet the requirements of the structure plan and that its identification as a 'local' housing proposal cannot be justified under the terms of Policy HOU8. I do not believe that there are any other material considerations in this case which would merit allocating the site for housing.

RECOMMENDATION

9.4.35 I recommend that no change is made to the finalised local plan in response to this objection.



< Inbox

30 of 329



Specavers Hearing

How to Tell if Someone is Losing Their Hearing

Age-related hearing loss develops slowly over a number of years



NEW FOI REF: 2016/922(10666) - Saltcoats Field and Fenton
Gait East



Freedom Of Information <foi@eastlothian.gov.uk>

To

Wednesday, 5 October, 2016 9:52

[Click to view full HTML](#)

Our Ref: 2016/922(10666)

Your Ref:

Dear Mr Marshall

FREEDOM OF INFORMATION (SCOTLAND) ACT 2002
ENVIRONMENTAL INFORMATION REGULATIONS 2004

Further to your enquiry, on behalf of East Lothian Council I am now able to provide our response; please refer to the PDF attachment.

Under the terms of this legislation, if you are unhappy with the way your request has been handled, you are entitled to request that we undertake an internal review. Please note, however, that both the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 only relate to the release of information. The Scottish Information Commissioner publishes the following guidance about internal reviews:

You can ask the authority to review its decision if it does not respond or you are unhappy with the way it has dealt with your request, for example by:

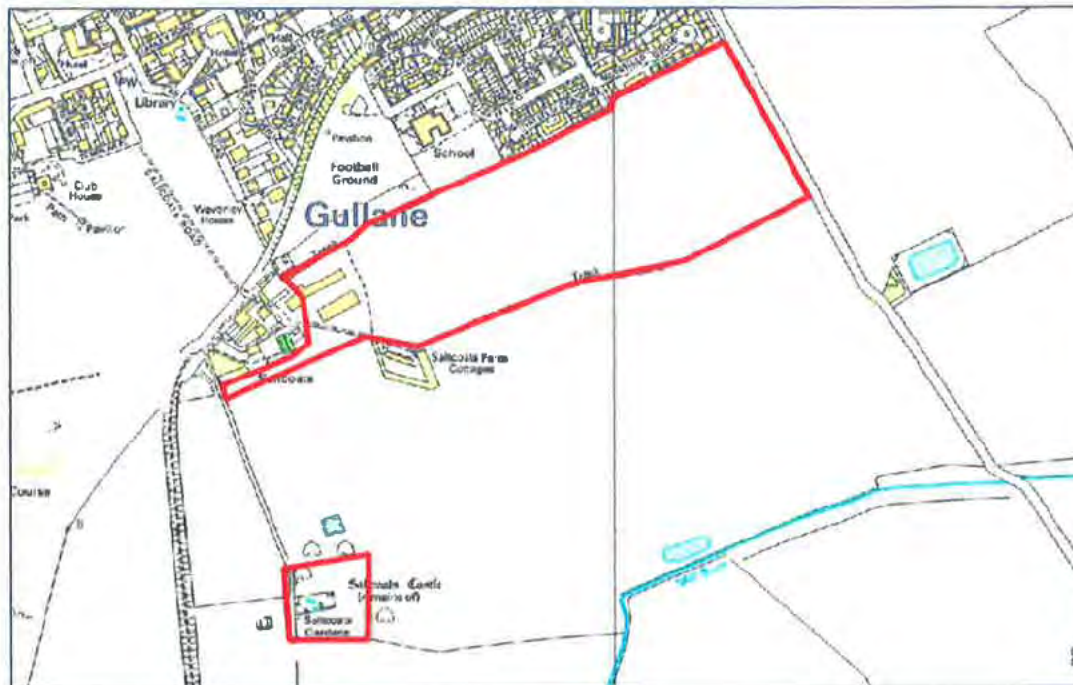
- * refusing to give you the information
- * failing to reply to you within the time limit allowed
- * claiming the information is exempt
- * failing to give you advice about, and help with, making your request
- * asking you to pay a fee that you feel is unreasonable

We must receive such a request within 40 working days of the date of this notice. A request to review our decision must be in writing (e-mail is acceptable) or another permanent format. When writing, you should include your reasons as to why you are unhappy with our response and why you wish it to be reviewed. In order to comply with the Freedom of Information (Scotland) Act 2002 (FOISA), your reasons for dissatisfaction **must** relate to your information request only. Please address this request to:

Data Protection and Freedom of Information Compliance Officer
Licensing Administration and Democratic Services
East Lothian Council
John Muir House
Haddington
EH41 3HA

Email: foi@eastlothian.gov.uk

SITE INFORMATION	
Topic	Comments
Site Name	Saltcoats Field
Site Ref	PM/NK/HSG060
Source of Site Suggestion	Agent (Wardell Armstrong) on behalf of landowner (Luffness Estate)
Site Size (ha)	17 ha total, 9 ha proposed development area
Current Use	Agricultural field
Proposed Use	Housing – 250 units
Summary Description	A large site in arable use bordering the southern edge of Gullane.



0 0.1 0.2 0.3 0.4 kilometres

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Transportation Comments:

- Access is very difficult to this site without significant urbanisation of the C111 (West Fenton Road). A planning appeal was dismissed for the adjacent site (to the north) at Muirfield Grove for access onto this road – planning reference 03/00189/FUL.
- A footway would be needed over the full frontage of the site and then continue northwards upto the junction of the C111 with the A198. This should provide a footway link into the existing pedestrian network.
- In addition the site has very poor potential for pedestrian linkage to the rest of Gullane only viable access appears to be through the existing school grounds.
- Access to Saltcoats Castle is very difficult too. Ransom on Saltcoats Road as this is private.

SITE INFORMATION	
Topic	Comments
Site Name	Muirfield, Gullane
Site Ref	PM/NK/HSG026b
Source of Site Suggestion	Agent (Derek Scott Planning) on behalf of Cruden Homes
Site Size (ha)	3.5 ha
Current Use	Agricultural Land
Proposed Use	Housing
Summary Description	A greenfield site in agricultural use on the eastern edge of Gullane adjacent to existing residential development at Fentoun Gait to the south of the A198.



Transportation Comments:

26b

- Access is only available from Fenton Gate which only has a footway on the west side of the road. This is currently a quiet Cul-de-sac so access via this would not be ideal!
- Access would be difficult from A198 as the junction would be too close to Duncur Road access.
- A footway would be preferred along the south side of A198 however the difference in site level would be difficult to achieve this – therefore resulting in a tortuous contrived route for pedestrians to get into town with no pedestrian provision – again not ideal.

We will then have 20 working days from the date we receive your request in order to complete our review and give you our decision. Please note that in some circumstances it may be necessary to appoint a senior officer not previously involved in this case to carry out the review.

If you are still not satisfied with our decision following the review process, then you may ask the Office of the Scottish Information Commissioner (OSIC) to investigate the matter. OSIC's application form can be found at <http://www.itspublicknowledge.info/YourRights/Unhappywiththeresponse/ApplicationForm.aspx>. Alternatively, you may contact OSIC at:

Scottish Information Commissioner
Kinburn Castle
Doubledykes Road
St Andrews
Fife
KY16 9DS

Telephone: 01334 464610
Fax: 01334 464611
E-mail: enquiries@itspublicknowledge.info<<mailto:enquiries@itspublicknowledge.info>>

Information about East Lothian Council's complaints procedure can be found at: http://www.eastlothian.gov.uk/site/scripts/services_info.php?serviceID=411

Yours sincerely

Dr Renate Gertz PC.dp.
Information Governance Compliance Officer
Licensing, Administration & Democratic Services
East Lothian Council
John Gray Centre
15 Lodge Street
Haddington
EH41 3DX
* 01620 827993
* rgertz@eastlothian.gov.uk

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 Reply

 Forward

 Star

 Mark as Unread


 Reply All

 Delete

 Move to

 Spam

Hi, jim



Dear Sir,

LDP



Thank you for your recent letter regarding Publication of Proposed Local Development Plan for representation. I have noted the dates the documentation will be available for viewing. Unfortunately I will not be around at that time but I do hope to view the Plan at the Library at a future date.

Yours faithfully,



19/09/2016

MR PETER WILSON



IN REGARD TO THE RECENT DOCUMENT I RECEIVED FROM YOURSELF I WOULD LIKE TO KNOW WHAT EFFECT THIS WILL HAVE ON MY BUSINESS UNIT, WILL IT BE THE LAND IT'S ON BE DEMOLISHED FOR THE USE OF YOUR INTENSIONS IN THE FUTURE AND THE IMPACT ON PASSING BUSINESS TRADE THAT I RELY ON FOR A LIVING BE AFFECTED,



19-09-2016

John Muir House
Brewery Park
Haddington
EH41 3HA



Delivered by



16-09-16

£0.51 PB556652

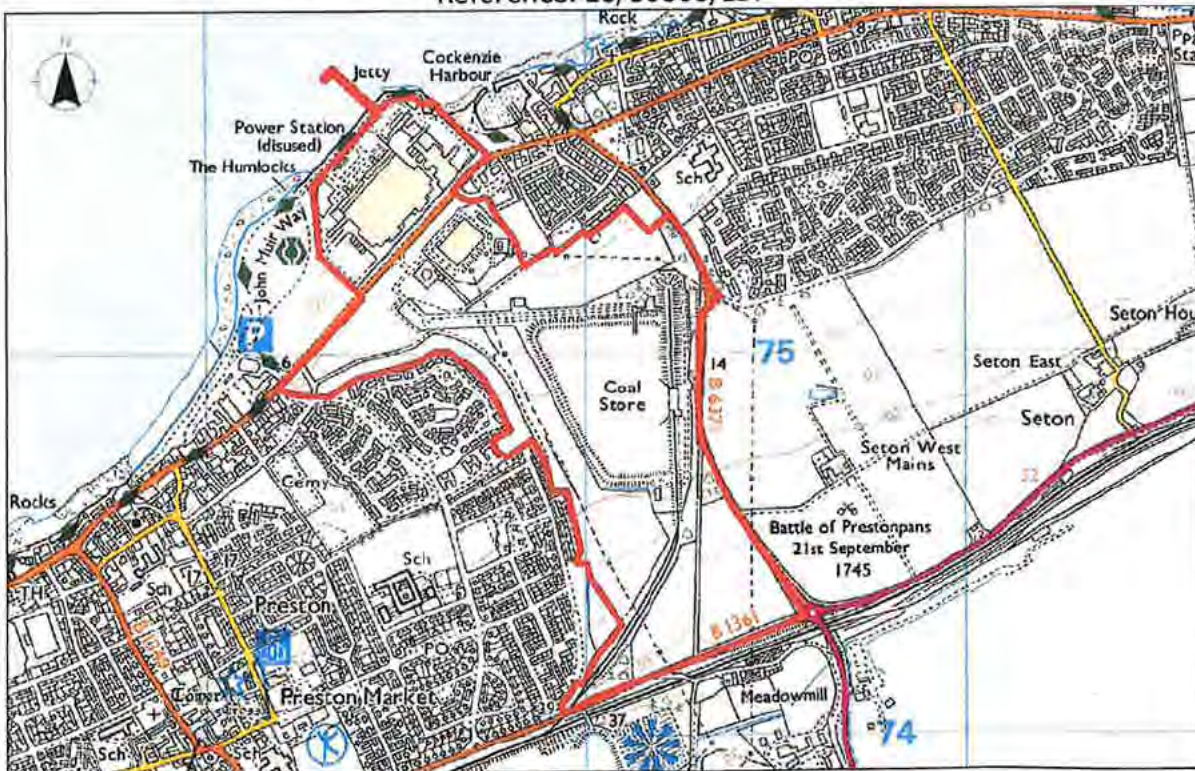
1

Letter

This is not a circular – East Lothian Council - This is not a circular

THIS FORM IS TO ADVISE YOU THAT THE EAST LOTHIAN LOCAL DEVELOPMENT PLAN IS AVAILABLE FOR COMMENT.

Reference: 16/00060/LDP



0 0.2 0.4 0.6 0.8 kilometres

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Response ID ANON-Y4KD-AZEM-9

Submitted to **East Lothian Local Development Plan - Action Programme**
Submitted on **2016-10-10 21:47:43**

Introduction

What is your name?

Name:

Kevin Reid

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

Resident/member of the public

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:

Reference 16/00033/LDP (PROP TT7)

We are writing in response to your notification on the above proposal. I wish to raise concerns and potential opposition regarding this proposed development for the following reasons.

1. Site access - We understand that the access to the new 150 home site is through the two spur roads at either end Chesterhall Avenue, of which our house No 17 is adjacent to the north side. We are concerned for the volume of traffic both in the construction phase and on completion resident vehicles which is going to use both spurs as a consequence of this extension. The present cul-de-sac environment is greatly valued by the many families with young children living here who are concerned for safety.
2. The existing entrance at Greendykes Road onto the estate from the A199 is close to a bend opposite Macmerry Primary School. The entrance is partially obscured to the right for cars exiting the village towards Haddington and is hazardous. Bringing more traffic from the additional homes to this junction will only increase the likelihood of an accident.

We would suggest that access to the new development is from the Old Smithy Mews end of the proposed site where line of sight both ways on the A199 is significantly better.

3. We have not been able to find a detailed layout of the proposed site and we would like to see the outline plans in order to comment in more detail on the layout of the houses and any children's play facilities, greenbelt screening etc. Is this presently available and if so how can we access it? Or if not, when will this information be added to the consultation hub?

We only purchased this home in July and it would appear from chatting to our new neighbours that we are the only address in and around No 17 Chesterhall Avenue who have received your consultation letter- why have our neighbours not received a mail shot, surely it is important to consult widely on the estate for this proposal?

Speaking for ourselves we appreciate the community housing needs as outlined in the East Lothian Council PLDP. We seek to engage positively in the consideration of site access and resident safety for this proposal but would oppose the development should an alternative site access route not be seriously considered at this important early planning consultation stage.

Kindest regards

Kevin and Ina Reid

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:

As above for Page 86. Macmerry housing proposal.

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 :

None

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:

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:

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

No, I do not wish to comment on any specific cluster area

Any other comments?

Do you have any further comments on the Action Programme?

Any other comments:

Please can I have an acknowledgement and response to completing this consultation submission

Upload file with further comments :

No file was uploaded