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East Lothian Council

Additional information:

To be read in conjunction with Report to East Lothian Council dated 29/05/18 titled East Lothian Local Development Plan 2018 - Supplementary Guidance / Supplementary Planning Guidance Consultation

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REPRESENTATIONS RECEIVED DURING DEVELOPMENT BRIEF PUBLIC CONSULTATION (2016)

SITE	REPRESENTOR	COMMENTS	OFFICER RESPONSE
NK10 Aberlady West	Ashley Higgins (DB01)	<p>Notes that the draft Development Briefs require development to reflect the build form, character and size of the nearby buildings. Concerned that Cruden homes plan for 2 storey houses.</p> <p>Increased traffic from the new site will require improvements to the Main Street.</p> <p>The cycle and walking link through Elcho Terrace is unsuitable and could be unsafe as there are two driveways and a turning circle used by everyone in the street. The road is a very narrow single track road. The plans show the proposed walkway would need to run through the end of our drive.</p>	<p>This site now benefits from full planning permission 16/00552/PM. The details of development have been scrutinised through the development management process. The brief will be amended to reflect the principles in the planning consent.</p>
NK11 Castlemains, Dirleton	John Finlay (DB02)	<p>The guide makes no reference for a southern boundary tree belt edge (as highlighted in Dirleton Village Association's place-making document – Dirleton Expects).</p> <p>Supports the inclusion of a new village green/public space. Such a green could be used to create a buffer zone between the planned new housing and the castle. It could also combine and link with existing greens. Rather than using a double-road dominated solution, a novel spine road and hedged house site boundaries would establish a circulation heart. It could also incorporate small lanes. Homes would then face the road and green.</p>	<p>The original draft Brief states that <i>a landscape edge incorporating a beech hedgerow and occasional specimen trees to frame built form should be created on this south boundary</i>. The Council suggest this is acceptable treatment to the southern boundary as it is important to maintain views towards Dirleton Castle from the A199. A solid tree belt edge may hinder such views.</p> <p>Support for the on site open space is noted.</p> <p>The Council agree that a double entrance is not appropriate. The site could incorporate a spine road winding through the site to create circulatory travel. This should be added to the Brief.</p>

<p>General comments</p>	<p>Homes for Scotland (DB03)</p>	<p>The Briefs are not based on a technical appraisal of the site and ground conditions. They do not reflect discussions already undertaken between developers and East Lothian Council's Development Management team. As a result, they should have little weight in the application determination process and text should be added to state that these are work in progress.</p> <p>There has been no developer input to these Development Briefs and Policy DP9 will require developers to conform to these Development Briefs. These Development Briefs need further work with the homebuilding industry.</p>	<p>The Development Briefs form non statutory Supplementary Planning Guidance. As they are non-statutory the Briefs will not form part of the development plan for East Lothian. Instead they will become a material consideration in the determination of planning applications. As the Briefs are a set of guiding principles, and not part of the statutory development plan, they have not been subject to technical appraisals or ground conditions. They are put in place to guide appropriate development in line with the principal policies of SPP2014. These are guiding principles to be followed, where possible.</p> <p>Policy DP9 states that <i>Proposals for the development of sites that are subject to a development framework or brief that has been adopted by the Council must conform to the relevant framework or brief.</i> As stated above these Briefs will be a material consideration in the determination of any application, they do not hold the weight of the Local Development Plan. The draft Briefs highlight that <i>they will be non-statutory extensions of the LDP Design policies and proposals, and will provide further information and guidance as to how these should be applied on a site by site basis.</i> However, the Council recognise that this should be further highlighted in the final Development Briefs. The final Briefs will be re-worded to explain that these are guiding principles to be followed, where possible.</p> <p>A period of consultation was undertaken in 2016. The Homebuilding industry were consulted at this stage. Indeed a number of representations were received. A further period of consultation will be undertaken during 2018, following receipt of the LDP Examination Report. The Homebuilding Industry will be consulted at this time.</p>
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			Since the initial consultation in 2016 some sites have benefited from a grant of planning permission, whilst other sites have been subject to pre-application discussions. The Council's Development Management Team will be fully involved in the preparation of the final Development Briefs.
NK10 Aberlady West	Frank Third (DB04)	The proposed foot access through Elcho Terrace is not feasible. I own the ground to half way across the end of Elcho Terrace and use it on a daily basis. I have to cross this area to get access to my driveway. It is not safe for pedestrians to cross here. There are always parked cars on the narrow road.	This site now benefits from full planning permission 16/00552/PM. The details of development have been scrutinised through the development management process. The brief will be amended to reflect the principles in the planning consent.
General Comments	Cala Homes (East) (DB05)	The draft briefs have been prepared without any engagement from landowners, developers or other council departments, as such they do not take account of previous dialogue on sites through the Development Management process. The future preparation and adoption of Development Briefs should be completed by undertaking a separate stakeholder consultation process.	A period of consultation was undertaken in 2016. The Homebuilding industry were consulted at this stage. Indeed a number of representations were received. A further period of consultation will be undertaken during 2018, following receipt of the LDP Examination Report. The Homebuilding Industry will be consulted at this time. Since the initial consultation in 2016 some sites have benefited from a grant of planning permission, whilst other sites have been subject to pre-application discussions. The Council's Development Management Team will be fully involved in the preparation of the final Development Briefs.
MH8 Levenhall, Musselburgh	Cala Homes (East) (DB05)	Submission of a revised development brief. Brief to state that: <ol style="list-style-type: none"> 1. site access be taken from the A199 2. The stone wall is a feature of the local area and should be retained and repaired where necessary and reconstructed to serve the new entrance 3. Immediately to the north of the access off the A199, a landscaped area with bridge access to the site is to be created with an open 	Full Planning application (17/00619/PM) pending. The details of development are being scrutinised through the development management process. The brief will be amended to reflect the principles the DM officer has considered and agreed.

informal character containing specimen trees and making use of the existing burn.

4. Open space should be concentrated in the northern part of the site and along the western boundary in the southern part of the site. A SUDS feature can be incorporated into the northern area of this open space.
5. Muted colour external finishes
6. Provide sufficient space to allow for further pedestrian/cycle connections to the south-east.
7. Off site, a controlled crossing of the A198 will be required to ensure safe pedestrian and cycling connectivity to adjoining open space and local services.

These details support the work done in the preparation of a planning application.

NK7 Saltcoats, Gullane
Cala Homes (East) (DB05)

Submission of a concept plan. The text accompanying the concept plan should read as follows:

1. Access to be taken from Road C111 which would require upgrading with additional street lighting and a footpath. This should provide a pedestrian link into the existing footpath network and an extension of the 30 mph limit. Built form should front but be set back from the C111, with a grass verge accommodating remote footpath and beech hedgerow and formal specimen tree planting to be provide along the C111 frontage.
2. On the southern boundary, along the boundary with the John Muir Way, a min 8m wide managed and accessible landscape edge is required, incorporating specimen trees

1. Point 1 submitted under representation DB05 reads identically to the draft Brief with the omission of built form must front onto the road, *with parking at the rear*. It also omits *potential for terraced forms*. The comments accept that built form should front onto the C111 at the east of the site but by omitting the need for parking at the rear, it is possibly suggesting that parking be acceptable at the front. The draft Brief requires parking at the rear to allow for a grass verge, beech hedgerow and formal specimen tree planting along the C111 frontage. This is an important design principle along this country road. The draft Brief should remain unaltered on point 1. It also allows for terraced styled properties, if suitable.
2. The draft Brief refers to *adjoining gardens must be defined by hedging*. Representation DB05 suggests

planted in groups. Views to the Lammermuir hills should be framed by planting design. Externally visible gardens should be defined by walling or hedging. There is potential to incorporate well designed and well landscaped SUDS within this edge. A min of 3 path access points should be provided on to this edge from the proposed housing areas connecting to the John Muir Way.

3. Houses along this edge must face outwards towards the countryside to present a higher quality and defined southern edge to Gullane. To provide interest and diversity, a varied building line is appropriate. Muted colours to be used.
4. Houses along the northern edge should present their backs to the existing housing on Muirfield Grove to create secure perimeters for new and existing properties.
5. Layout must permit walking and cycling between C111 and the existing and new open spaces to the north west and west of the site and onto the John Muir Way along the southern boundary. Walking and cycling should also connect to the existing settlement.
6. New open space of parkland character should be provided in the area indicated to the west of the site and to the south of Gullane Primary. The SUDS proposal is proposed at the lowest point on the site at the south eastern corner.

externally visible gardens should be defined by walling or hedging. The Council agree that the Brief should refer to *externally visible gardens* since this is consistent with surrounding residential developments. However, the Council maintain that the boundary be hedging, in keeping with the surrounds and adjacent agricultural land and given the site's proximity to the Gullane Conservation Area.

3. The representation states that a *varied building line is appropriate along this boundary to provide interest and diversity* (south boundary). The draft Brief requested a *consistent building line with mixed gables and backs*. The Council concede that a varied building line will enhance the interest of the site from approaching views. This is consistent with the indicative Masterplan docketed to the planning permission in principle 16/00594/PPM.
4. The representation proposes *that houses along the northern edge should present their backs to the existing housing on Muirfield Grove to create secure perimeters for the new and existing properties*. The Council accept this and will include within the Brief.
5. The draft Brief details that *the walking and cycling connections will require some off-site delivery to connect to Muirfield Gardens, Muirfield Grove and Muirfield Drive at Gullane Primary School*. The representation has omitted this point in their proposed changes. The Council deem this important to assist in linking the new development to the rest of the village.
6. The draft Brief encourages well-designed and well landscaped SUDS within the open space in point 5 if appropriately designed. Representation DB05 suggests that the *SUDS proposal is proposed at the lowest point*

		<p>7. The precise extent of land to be retained for Primary School expansion be agreed once the scale of extension is known. A tree belt is proposed to the west of the school extension land, which is envisaged to tie in with the Millennium Wood to the immediate north.</p> <p>8. Land immediately to the west of the allocation is covered by Policy DC1 and is outwith the scope of the Development Brief.</p> <p>In preparing a previous application and following public consultation and pre-application meetings, CALA has a good understanding of the key physical, environmental and economic characteristics.</p>	<p><i>on the site in the south eastern corner.</i> This is compliant with the indicative Masterplan docketed to the planning permission in principle 16/00594/PPM. The draft Brief highlights this as a possible SUDS location on the indicative plan. The Council will add text to highlight this.</p> <p>7. Land for school expansion is required and should be indicatively identified in the Development Brief. The site will need to be considered at the detailed planning application stage.</p> <p>8. The representation highlights that land to the west of the draft Brief is outwith the housing allocation in the emerging Local Development Plan. That is correct. The boundary of the site in the final Brief will be re-drawn to exclude that land to the west covered under Policy DC1.</p>
NK8 Fentoun Gait East, Gullane	Cala Homes (DB05)	Revised Development Brief submitted and various proposed changes to text.	This site now benefits from full planning permission 16/00587/PM. The details of development have been scrutinised through the development management process. The brief will be amended to reflect the principles in the planning consent.
NK11 Castlemains, Dirleton	Cala Homes (DB05)	<p>Revised development brief submitted. The text should read as follows:</p> <ol style="list-style-type: none"> 1. Vehicular access to be provided from new junction off Station Road. Existing hedgerow to be retained, where possible. 2. Careful and sensitive design along the southern boundary should integrate the development into its landscape setting. Development on the southern edge should be outward facing (south) An open landscape space incorporating specimen trees to frame the built form should be created on this southern boundary. Views across the site 	<ol style="list-style-type: none"> 1. Agree that the Brief should allow for vehicular access off Station Road. As noted in response to DB02 above, the Brief should refer to a circular route through the site. As part of the LDP examination, the Council submitted that the finalised Briefs should be written using words such as 'may' or 'should' rather than 'will' or 'must' where appropriate. It is agreed that the wording on the hedgerow retention be amended from <i>must be retained to be retained, where possible</i> on station road. The hedgerow at Castlemains Place should be retained, as it provides a natural buffer between the new development and existing development.

- from the A198 to Dirleton Castle must be maintained.
3. Existing trees and beech hedgerow along the northern boundary are to be retained to provide a robust landscaped edge, with a significant setback to buildings providing good distance to the existing properties of Castlemains Place. The built form should reflect that of the north side of Castlemains Place.
 4. Pantile or slate roof cladding to be used. Muted colours for external walls. The buildings should be grouped together according to roofing materials to avoid pepper-potting throughout the site. Layout should be in keeping with the village grain with a variety of terrace, semi-detached and detached.
 5. A designed landscape open space should be created to the southern half of the site to create an enhanced foreground setting for views to the castle on approach from the east. Footpath connections from the existing public footpaths to the north of the site should be provided, giving access to the landscaped space. The electricity line that runs across the site should be undergrounded.
 6. SUDS proposals to be located at the lowest point of the site, on the eastern boundary. These views reflect pre-application discussions and subsequent planning applications.
2. This only differs from the draft Brief in respect of suggesting that development be *outward facing and an open landscape space...* instead of the draft which states *a landscape edge...* The Council consider the wording of the draft Brief to be sufficient to cover careful and sensitive design, whilst allowing for some flexibility at the application stage.
 3. The only change to point 3 of the draft Brief is in the inclusion of ‘...with a significant setback to buildings providing good distance to the existing properties on Castlemains Place’. There is already a road and swathe of open space separating the allocation site from the properties on Castlemains Place. The Council deem this adequate distance and will make no change to the Brief.
 4. By virtue of re-writing the key development points of the Brief the representation has omitted some important design guidelines. In particular, in Point 4 of the Brief, *buildings of 1.5 storey in height may be acceptable on the northern part of the site where ground levels are lower. Otherwise, and to maintain key views across the site, buildings should be no higher than single storey in height* has been omitted. This is a key design principle with the aim of retaining views across the site, in particular to Dirleton Castle. However, the Council concedes that, so long as key views are maintained, buildings of 1.5 storey are acceptable across the site. Representation DB13 from HES states that without the mitigation of impacts on Dirleton Castle as identified in the draft Brief, there is the potential for development in this area to have a significant impact. It will therefore be imperative that views are maintained.

			<p>5. The representation has re-written point 5 and removed the reference to <i>an open space of at least 60m by 40m is to be located in the western part of the site, adjoining and enhancing the existing area of open space immediately to the north of the site at the western end of Castlemains Place to create a village green. Buildings should front onto and overlook this area of enlarged open space.</i> The re-written point 5 of the Brief as submitted as part of this representation fails to address the need for on site open space above and beyond that identified in the south western corner (Point 2 of the draft Brief highlights the south western edge for additional open space). The inclusion of this open space is supported by representation DB002. The Brief cannot stipulate that a strip of land to west remain in agricultural use, as suggested by the current planning application, since this land is allocated for residential use. New open space should be required on site as this will fit with the character and landscaping of the village.</p> <p>6. The draft Brief suggests that SUDS could be incorporated into the area of open space. It is accepted that they could additionally be located on the eastern boundary or could be located on the eastern boundary instead of the open space location. The Brief should be altered to reflect this.</p>
General Comments	Cruden Homes (DB06)	The draft Briefs have been prepared without any engagement from landowners, developers or other council departments, as such they do not take account of previous dialogue on sites through the Development Management process. The future preparation and adoption of Development Briefs should be completed by undertaking a separate stakeholder consultation process.	A period of consultation was undertaken in 2016. The Homebuilding industry were consulted at this stage. Indeed a number of representations were received. A further period of consultation will be undertaken during 2018, following receipt of the LDP Examination Report. The Homebuilding Industry will be consulted at this time.

Since the initial consultation in 2016 some sites have benefited from a grant of planning permission, whilst other sites have been subject to pre-application discussions. The Council's Development Management Team will be fully involved in the preparation of the final Development Briefs.

NK10 Aberlady West	Cruden Homes (DB06)	Proposed changes to text and accompanying concept plan to reflect Cruden Home's proposed planning application.	This site now benefits from full planning permission 16/00552/PM. The details of development have been scrutinised through the development management process. The brief will be amended to reflect the principles in the planning consent.
General Comments	Hamilton Farming Enterprises (DB07)	The Development Briefs should incorporate some flexibility since the Briefs are based on limited information and surveys. It is agreed that the Development Briefs should be non-statutory Supplementary Guidance.	The Development Briefs form non statutory Supplementary Planning Guidance. As they are non-statutory the Briefs will not form part of the development plan for East Lothian. Instead they will become a material consideration in the determination of planning applications. As the Briefs are a set of guiding principles, and not part of the statutory development plan, they have not been subject to technical appraisals or ground conditions. They are put in place to guide appropriate development in line with the principal policies of SPP2014. These are guiding principles to be followed, where possible.
			<p>Policy DP9 states that <i>Proposals for the development of sites that are subject to a development framework or brief that has been adopted by the Council must conform to the relevant framework or brief.</i> As stated above these Briefs will be a material consideration in the determination of any application, they do not hold the weight of the Local Development Plan. The draft Briefs highlight that <i>they will be non-statutory extensions of the LDP Design policies and proposals, and will provide further information and guidance as to how these should be applied on a site by site basis.</i> However, the Council recognise that this should be further highlighted in the final Development</p>

TT16 East Saltoun	Hamilton Farming Enterprises (DB07)	The draft Brief proposes that vehicular access must be provided adjacent to the east side of the village green, it is proposed that the vehicular access be moved 40-50 m eastward along the B6355. Providing access as per the draft Brief would create a cross road junction. Moving the access location as per this representation would allow for a staggered junction arrangement which is preferred in the Council's Standards for Development Roads and would comply with the Council's minimum standard of 40m.	<p>Briefs. The final Briefs will be re-worded to explain that these are guiding principles to be followed, where possible.</p> <p>The examination report recommends that the Council remove housing allocation PROP TT16 (East Saltoun) from the plan and delete Paragraph 2.106 (modification 11). As a consequence, this supersedes the comments below:</p> <p>The draft Brief states that <i>vehicular access to the site will be from the B6355, and must be provided as a shared surface route adjacent to the east side of the village green</i>. The Council agree that the draft Brief is overly prescriptive. Access should be from the B6355, but it is accepted that access may not be best placed immediately adjacent to the proposed village green.</p> <p>Point 2 of the draft Brief should instead provide an indicative access point. Indeed, relocating the access point would allow for point 1 of the draft Brief to be fulfilled (<i>houses should front onto the green</i>). Indeed the Council's Transportation Standards for Development Roads (2008) states <i>that where two minor roads approach a major road from opposite sides, a staggered junction comprising two T's should normally be used instead of a crossroads</i>.</p>
General Comments	Sirius Sport and Leisure (DB08)	The development briefs are based on limited information and surveys. A final solution with further detailed survey and design may differ from that set out in the Development Briefs. Accordingly, compliance with an allocated site's Development Brief should incorporate some flexibility.	The Development Briefs form non statutory Supplementary Planning Guidance. As they are non-statutory the Briefs will not form part of the development plan for East Lothian. Instead they will become a material consideration in the determination of planning applications. As the Briefs are a set of guiding principles, and not part of the statutory development plan, they have not been subject to technical appraisals or ground conditions. They are put in place to guide appropriate development in line with the principal policies of SPP2014. These are guiding principles to be followed where possible.

Policy DP9 states that *Proposals for the development of sites that are subject to a development framework or brief that has been adopted by the Council must conform to the relevant framework or brief.* As stated above these Briefs will be a material consideration in the determination of any application, they do not hold the weight of the Local Development Plan. The draft Briefs highlight that *they will be non-statutory extensions of the LDP Design policies and proposals, and will provide further information and guidance as to how these should be applied on a site by site basis.* However, the Council recognise that this should be further highlighted in the final Development Briefs. The final Briefs will be re-worded to explain that these are guiding principles to be followed, **where possible.**

MH13 Howe Mire, Wallyford	Sirius Sport and Leisure (DB08)	The development brief proposes only one access point from Victory Lane. The site should be presented with two access points. The additional access location should be provided via a new junction on Salter's Road formed opposite the proposed access. The scale of development will have greater connectivity and permeability with more than one access point to comply with Council requirements. The intention to make these Development Briefs non-statutory supplementary guidance is supported.	The examination report recommends that the Council remove housing allocation PROP MH13 (Howe Mire, Wallyford) from the plan. As a consequence, this supersedes the comments below: Policy PROP MH13 allocates the site at Howe Mire in the emerging Local Development Plan. The supporting text to Policy PROP MH13 requires the creation of a road connection between Whitecraig Avenue through to Salter's Road. This should satisfy representation DB08. Reference to this should be made in the final Development Brief.
MH13 Howe Mire, Wallyford	Sirius Sport and Leisure (DB08)	The site boundary as shown in the Development Brief extends to 10.7ha. The Council has unintentionally excluded land from the site because it has drawn the area of the Stadium car parking too large. The area presented in the Development Framework Report establishes the appropriate boundary.	The examination report recommends that the Council remove housing allocation PROP MH13 (Howe Mire, Wallyford) from the plan. As a consequence, this supersedes the comments below: The site boundary issue has been dealt with through the LDP examination (0274/1). The Development Brief will be finalised after the Examination.
General Comments	Wallace Land Investments (DB09)	The Development Briefs are based on limited information and surveys. A final solution with further detailed survey and design may differ from that set	The Development Briefs form non statutory Supplementary Planning Guidance. As they are non-statutory the Briefs will not form part of the development plan for East Lothian. Instead

out in the Development Briefs. Accordingly, compliance with an allocated site's Development Brief should incorporate some flexibility.

they will become a material consideration in the determination of planning applications. As the Briefs are a set of guiding principles, and not part of the statutory development plan, they have not been subject to technical appraisals or ground conditions. They are put in place to guide appropriate development in line with the principal policies of SPP2014. These are guiding principles to be followed where possible.

Policy DP9 states that *Proposals for the development of sites that are subject to a development framework or brief that has been adopted by the Council must conform to the relevant framework or brief.* As stated above these Briefs will be a material consideration in the determination of any application, they do not hold the weight of the Local Development Plan. The draft Briefs highlight that *they will be non-statutory extensions of the LDP Design policies and proposals, and will provide further information and guidance as to how these should be applied on a site by site basis.* However, the Council recognise that this should be further highlighted in the final Development Briefs. The final Briefs will be re-worded to explain that these are guiding principles to be followed, **where possible.**

MH15
Whitecraig
North (Now
MH14)

Wallace Land
Investments
(DB09)

The access point specified in the Development Brief will need to move further east, beyond the identified boundary. Accordingly there should be an amendment to the allocation boundary to accommodate a viable and safe access from Whitecraig Road. It is not possible to achieve the proposed access within the boundary as required visibility splays cannot be achieved because of an obstruction from an existing telecommunication mast and the boundary of an existing house plot on Whitecraig Road.

This issue has been dealt with through the LDP examination (0285/1). The Council submitted that vehicular access could be provided through land currently designated as Green Belt, as in policy terms a road through this area may be treated as essential infrastructure consistent with proposed LDP Policy DC7 (CD039), should this be demonstrated consequent on further technical work at project level. The Reporter concluded that the site boundary should remain as proposed and the issue of access should be dealt with at the planning application stage.

MH15 Whitecraig North (Now MH14)	Wallace Land Investments (DB09)	The amended site is capable of accommodating up to 250 homes. The Development Brief should reflect this.	This issue has been dealt with through the LDP examination (0285/1). It is the Council's opinion that no further capacity is required. Additional land within the allocation can be used for open space and landscaping. The Reporter recommends no change to the site yield. The site capacities are indicative and based on a nominal 30 units per hectare consistent with Policy DP3. Additional allocation of housing is not needed in order to provide for the housing requirement within the plan.
General Comments	Lothian Park (DB10)	The Development Briefs are based on limited information and surveys. It is probable that through further detailed survey and design, an acceptable proposal could be delivered. A degree of flexibility is necessary. Accordingly, compliance with the site Development Brief should incorporate some flexibility.	<p>The Development Briefs form non statutory Supplementary Planning Guidance. As they are non-statutory the Briefs will not form part of the development plan for East Lothian. Instead they will become a material consideration in the determination of planning applications. As the Briefs are a set of guiding principles, and not part of the statutory development plan, they have not been subject to technical appraisals or ground conditions. They are put in place to guide appropriate development in line with the principal policies of SPP2014. These are guiding principles to be followed where possible.</p> <p>Policy DP9 states that <i>Proposals for the development of sites that are subject to a development framework or brief that has been adopted by the Council must conform to the relevant framework or brief.</i> As stated above these Briefs will be a material consideration in the determination of any application, they do not hold the weight of the Local Development Plan. The draft Briefs highlight that <i>they will be non-statutory extensions of the LDP Design policies and proposals, and will provide further information and guidance as to how these should be applied on a site by site basis.</i> However, the Council recognise that this should be further highlighted in the final Development Briefs. The final Briefs will be re-worded to explain that these are guiding principles to be followed, where possible.</p>

MH3 Old Craighall Junction South West	Lothian Park (DB10)	The Development Briefs are presented on a site by site basis. Adding cross-referencing into the Development Briefs for sites which are adjacent to other allocations would help ensure that the ongoing design process is comprehensive in its considerations. The Development Brief for MH3 Old Craighall Junction South West refers to the access arrangements off the B6415. It does not highlight the need for any junction arrangement into MH3 to take account of the access arrangements into MH1 Land at Craighall, Musselburgh.	The Council agree that cross referencing for sites that are adjacent to other allocations would allow for consistency in design. It is agreed that the links between sites MH3 and MH1 should be considered, particularly as both sites will take access from the B6415.
MH4 Land at Old Craighall Junction	Lothian Park (DB10)	Lothian Park welcomes the continued allocation of site PROP MH4 for Class 4, 5 and 6 uses. A Development Brief should be prepared to guide the development of this allocated site. This should include a degree of flexibility and consideration of mutual connectivity with adjacent sites.	Land to the north of Old Craighall Junction between the A720 and Old Craighall Road was allocated by the previous Local Plan for employment. Planning permission was approved for employment uses and a hotel, but this proposal was not implemented and planning permission has now lapsed. As a suitable design solution was proposed through the previous planning application, the Council do not deem it of value to prepare a further Development Brief.
DR2 Hallhill North, Dunbar	Hallhill Developments (DB11)	Remove references in the Development Brief (and LDP) to the re-opening of the underpass.	The Council has already opened discussions with Network Rail on the re-opening of the rail underpass. Discussions with the developer on its reopening will be required in due course as proposals for the DR2 site are developed. This issue was dealt with through the LDP Examination (0395/1). The Reporter concluded that there is sufficient justification for the underpass and reference to it will remain in the brief.
MH1 Craighall, Musselburgh	Persimmon Homes (DB12)	Concerned that the draft Development Brief may be overly prescriptive, given that significant detailed work still requires to be undertaken, which may point towards alternative site design options. There is significant work still to be done on such matters as habitat assessment, accessibility, circulation, safe	The Development Briefs form non statutory Supplementary Planning Guidance. As they are non-statutory the Briefs will not form part of the development plan for East Lothian. Instead they will become a material consideration in the determination of planning applications. As the Briefs are a set of guiding principles, and not part of the statutory development plan, they

routes to school, landscape assessment and community facility requirements – all of which may influence the content of the Brief.

have not been subject to technical appraisals or ground conditions. They are put in place to guide appropriate development in line with the principal policies of SPP2014. These are guiding principles to be followed where possible.

Policy DP9 states that *Proposals for the development of sites that are subject to a development framework or brief that has been adopted by the Council must conform to the relevant framework or brief.* As stated above these Briefs will be a material consideration in the determination of any application, they do not hold the weight of the Local Development Plan. The draft Briefs highlight that *they will be non-statutory extensions of the LDP Design policies and proposals, and will provide further information and guidance as to how these should be applied on a site by site basis.* However, the Council recognise that this should be further highlighted in the final Development Briefs. The final Briefs will be re-worded to explain that these are guiding principles to be followed, **where possible.**

MH8 Levenhall	Historic Environment Scotland (DB13)	The Brief should be updated to reflect the Battle of Pinkie battlefield as a key issue in the design and implementation of development in this area.	Full Planning application (17/00619/PM) pending. The details of development are being scrutinised through the development management process. The brief will be amended to reflect the principles the planning officer has considered and agreed to date.
MH13 Howe Mire, Wallyford	Historic Environment Scotland (DB13)	The Development Brief in its current form makes no reference to the Battle of Pinkie battlefield. In particular, the Brief identifies an area for employment development in the south west of the allocation. Buildings of an industrial scale in this part of the allocation are likely to separate this land from the rest of the battlefield, and this would be of particular concern. The Development Brief therefore currently reflects no consideration of this nationally designated heritage asset.	The examination report recommends that the Council remove housing allocation PROP MH13 (Howe Mire, Wallyford) from the plan. As a consequence, this supersedes the comments below: The Council have allocated MH13 in the emerging Local Development Plan with the view that the site presents an opportunity for development, subject to mitigation of cultural heritage considerations. It is agreed that the Brief should make reference to the Battle of Pinkie Battlefield and explore possible mitigation measures around impact on this historic

environment. In line with Policy CH5 of the emerging LDP. The Brief sets an indicative area for employment. The representation makes no alternative suggestion, but has concerns about the current Brief layout. The Council will consider HES guidance contained in *Managing Change in the Historic Environment: Guidance Notes* in finalising the Brief.

PS1 Longniddry South, Prestonpans	Historic Environment Scotland (DB13)	The representation welcomes that the Development Brief identifies a need to retain the listed buildings in the boundary, and safeguard their setting. It is recommended that the Development Brief should also reflect advice previously given in regard to Gosford House designed landscape, particularly as alterations to the boundary have increased the possibility for impacts on the setting of this asset. It is likely that such impacts can be mitigated through consideration of the design and density of the development.	The Council agree that the Development Brief should refer to Gosford House designed landscape with a view to considering mitigation through design. This site now benefits from planning permission in principle 16/00485/PPM. The details of development have been scrutinised through the development management process. The brief will be amended to reflect the principles in the planning consent.
TT5 Bankpark, Tranent	Historic Environment Scotland (DB13)	A Development Brief has been provided. This currently makes no reference to cultural heritage issues. This should be updated. It should include consideration of impacts on the Conservation Area and B Listed parish church, as well as Prestonpans Battlefield.	The Council agree that the Development Brief should make reference to the adjacent Conservation Area (and Character Statement) and setting of the B Listed Church as well as the Prestonpans Battlefield. The Council's Cultural and Built Heritage SPG will guide appropriate development in Conservation Areas. The final Development Brief should refer to the Cultural Heritage and Built Heritage SPG, which will also be a material consideration in the determination of planning applications.
TT12 Woodhall, Wester Pencaitland	Historic Environment Scotland (DB13)	This site is adjacent to Pencaitland Conservation Area. This should be reflected in the Brief.	The Council agree that the Development Brief should make reference to the adjacent Conservation Area (and Character Statement). The Council's Cultural Heritage and Built Environment SPG will guide appropriate development in Conservation Areas. The final Development Brief should refer to the Cultural Heritage and Built Environment SPG, which will

			also be a material consideration in the determination of planning applications.
TT14 Parkview, Easter Pencaitland	Historic Environment Scotland (DB13)	This site is located within Winton House Garden and Designed Landscape, and Pencaitland Conservation Area. These issues have been given due consideration in the Development Brief for this allocation Historic Environment Scotland consider the key points identified to be appropriate, and likely to be effective in mitigating any significant impacts.	Noted.
TT16 East Saltoun	Historic Environment Scotland (DB13)	This site is within the East Saltoun Conservation Area. This should be reflected in the Brief. Development in this area would have the potential to fundamentally change the character of the Conservation Area. HES suggest mitigation through a design strategy and development in conjunction with a Conservation Area Appraisal.	<p>The examination report recommends that the Council remove housing allocation PROP TT16 (East Saltoun) from the plan and delete Paragraph 2.106 (modification 11). As a consequence, this supersedes the comments below:</p> <p>The draft Brief does reflect the fact the site is wholly contained within the East Saltoun Conservation Area. Stating <i>a traditional building form, height and materials is required to reflect wider built form and character of the conservation area. New houses must fit with the built form of existing houses and be single or 1.5 storeys in height particularly along the northern boundary. Potential for larger 2 storey houses can be explored towards the south of the site. External finishes should be muted in colour with roofs clad either with slate or pantile. Buildings with similar roof cladding should be grouped together according to their roof cladding.</i> Conservation Area Character Statements are contained within the East Lothian Local Plan 2008. There is one for East Saltoun. These will be updated in the Council’s Cultural Heritage and Built Environment SPG. The final Development Briefs should refer to the Cultural Heritage and Built Environment SPG , which will also be a material consideration in the determination of planning applications.</p>
DR7 Land at Spott Road, Dunbar	Historic Environment	HES welcome the fact that the Development Brief recognises a need to avoid the use of large scale or taller buildings in the more elevated areas of the site.	The Council agree that the nearby Broxmouth Park (Garden and Designed Landscape) would warrant special mention in the Brief, especially in the context of limiting large scale or taller

	Scotland (DB13)	This is likely to contribute to the avoidance of impacts on Broxmouth Park. We would advise that explicit reference is given to this in the Development Brief. We would also recommend that reference is made to possible requirements to mitigate any significant impacts on Dunbar II battlefield in this document.	buildings. This is in line with Policy CH6 of the emerging Local Development Plan. The Council further agree that reference should be made in the final Brief to mitigating against any potential significant impacts on the Dunbar II Battlefield, in line with Policy CH5 of the emerging LDP.
NK10 Aberlady West	Historic Environment Scotland (DB13)	HES welcome the fact that the Development Brief recognises the Conservation Area as a consideration. They recommend that the Gosford House Designed Landscape is also identified in this document.	This site now benefits from full planning permission 16/00552/PM. The details of development have been scrutinised through the development management process. The brief will be amended to reflect the principles in the planning consent. As the site adjoins the Gosford House Designed Landscape it is a good idea to mention this.
NK11 Castlemains, Dirleton	Historic Environment Scotland (DB13)	The Development Brief identifies appropriate and effective mitigation measures for impacts on the setting of Dirleton Castle. HES are content that development proposals following these key points would be likely to be able to mitigate significant adverse impacts. No reference is made to the Conservation Area in this document, and it is recommend that this is updated, with reference to a completed Conservation Area appraisal. Without the mitigation of impacts on Dirleton Castle as identified in the Development Brief, there is the potential for development in this area to have such a significant adverse impact that HES may object a planning application which did not correspond to the Brief in its current form.	The Council welcome the support from HES for the draft Brief. The Council agree that reference be made to the Conservation Area. Reference will also be made to the emerging Cultural Heritage and Built Environment SPG which will contain further guidelines for development in Conservation Areas.
MH1 Craighall, Musselburgh	Elaine Edwardson (DB14)	The B6415 is inadequate for the amount of traffic that will be using it in future following completion of proposed developments that affect Old Craighall as well as from new development at Millerhill.	During the preparation of the LDP there was identified a need to understand how the existing transport infrastructure would cope with the additional planned development. The Council has undertaken a Transport Appraisal of the proposed LDP. There

has been liaison with Transport Scotland throughout the Appraisal work to agree the approach at various stages. The TA included transport modelling work, preliminary feasibility and design work to identify adequate technical solutions and realistic options necessary to support the Local Development Plan. This has resulted in the identification of appropriate interventions that will enable the Council and Transport Scotland to manage road capacity and traffic generation issues to an acceptable level once new development is in place. Where necessary, transport contributions will be sought from developers to improve the road and rail network. These issues cannot be dealt with through the Development Brief.

MH1
Craighall,
Musselburgh

Amanda
Ferguson
(DB15)

Objects to the site changing a green belt area.
Concerned about the potential height of building used
for employment purposes.

Issues of land use have been dealt with through the LDP process. The Reporter agrees with the plan's spatial strategy. The Development Brief for the site shows how the Council expects the site to be developed. The Council agree that the final Brief should include further details on new buildings to ensure that these are not overly dominant in scale or position particularly when viewed from the road. Also add to Brief 'Careful attention should be given to scale and design in those areas close to the few existing residential properties adjacent to the B6415, ensuring that development does not overly dominate those properties.'

LDP EXAMINATION REPORT – REPORTER’S CONCLUSIONS AND RECOMMENDATIONS

<i>Site</i>	<i>Comments</i>
MH1 Craighall, Musselburgh	<ul style="list-style-type: none">• The reporter agrees that proposal MH1 should continue to include indicative housing numbers and that Craighall will sit below Shawfair in terms of the hierarchy of centres. The reporter agrees that the balance of uses is right, that any reduction in the numbers of houses across the site could affect its viability and that the site should come forward with a comprehensive masterplan for its entire area.
MH3 Old Craighall Junction South west	<ul style="list-style-type: none">• The Reporter is satisfied that sufficient measures are proposed to deal with the additional trips on the road network generated by this proposal and the wider measures to tackle air quality issues and deliver improved public transport provision and active travel within the area.
MH8 Levenhall, Musselburgh	<ul style="list-style-type: none">• The Examination report concludes that the site is generally well contained and its development will not significantly affect the wider landscape setting of Musselburgh. The site is suitable as an allocation for residential development. The request to reduce the capacity on site was considered but the Reporter concludes that it is not appropriate to reduce the capacity of this allocation in advance of the detailed considerations that would take place at the planning application stage.
MH10 Dolphinstone, Wallyford	<ul style="list-style-type: none">• The site is suitable for inclusion as an allocation for residential development. The Examination report notes that the draft development brief proposes a number of mitigation measures in relation to the visual and physical coalescence of the site with Prestonpans. These include the retention of an area of open space on the higher ground in the east of the site in order to maintain the important regionally distinctive views towards the Edinburgh skyline and East Lothian coastline and sea, from the A1 road.
MH13 Howe Mire, Wallyford	<ul style="list-style-type: none">• The Examination report recommends the deletion of this proposal and the preceding text in paragraphs 2.38-2.40. The reporter considers that the site is an inappropriate one due to unacceptable impacts on the historic battlefield, green belt and setting of Wallyford and should be removed from the plan. The employment component of Proposal MH13 is also deleted and is not replaced, the reporter considers that there is sufficient land allocated for employment within the plan.
MH14 Whitecraig South, Whitecraig	<ul style="list-style-type: none">• The Reporter considers a number of issues with regards to the allocation of Whitecraig South, and concludes that the site makes a contribution to the housing requirement of the plan.
MH15 Whitecraig North, Whitecraig	<ul style="list-style-type: none">• The Examination report notes that the Council will require a robust landscaped boundary to be created across the north and east of the site. This will form a new green belt boundary and the new edge to the settlement. The proposal for circa 200 homes as the site yield should remain with the Reporter stating that additional allocation of housing is not needed in order to provide for the housing requirement within the plan.

PS1 Longniddry South, Prestonpans	<ul style="list-style-type: none"> The Examination report concludes that the site is suitable for inclusion as a housing allocation and is required to help meet the housing requirement identified within the plan. The Reporter notes that the Council are minded to grant planning permission in principle, subject to a section 75 agreement.
TT1 Windygoul South, Tranent	<ul style="list-style-type: none"> The reporter agrees that the site has been adequately scrutinised for inclusion as a land allocation. As currently written Site PROP TT1 states that it will include community uses, when in fact, they will take place at Proposal TT2. Site PROP TT1 is recommended to be removed as a mixed use allocation and allocated for housing, circa 550 homes. The Reporter requests that the density of the housing development should make efficient use of land. The Reporter acknowledges that the draft site development brief identifies the need for the development to include landscaping which will help to define a new settlement edge. There is a representation to the LDP (0227) objecting to the inclusion of site TT1 citing the adjacent existing employment (research centre) and stating that it is not in the interests of either the employment use or future residents to have such a close physical relationship. The Reporter concludes that 'with regard to the potential conflict between housing and employment uses, the draft development brief identifies that the main open space provision should be located on the northern edge of the site to link into the existing open space to the west of the school and area for future school expansion. In addition, as the area between Carlaverock Farm and the research centre and the north west corner of the site are the higher parts of the site, it states that they should be kept free from visually obtrusive development and would be appropriate areas for open space within the site. I therefore consider it would be possible to design a housing development that would not prejudice current and future employment development at the site'.
TT3 Windygoul Employment Site, Tranent	<ul style="list-style-type: none"> The Reporter concludes that the site will support the requirement to ensure that there is a range and choice of employment sites across the area.
TT4 Lammermuir Terrace, Tranent	<ul style="list-style-type: none"> The Reporter considered the site yield and concluded that circa 120 homes is appropriate. The final capacity of the site should be determined through the development management process in applying Policy DP3.
TT5 Bankpark, Tranent	<ul style="list-style-type: none"> The Reporter recognises that the draft site development brief identifies that the site could be accessed from Bankpark Grove, via Bankpark Crescent or from Dovecot Brae onto Brickworks Road. The Reporter concludes that the detail of which would be considered through the assessment of a planning application. The Reporter highlights that the draft Environmental Report site assessment suggests that there may be opportunities to improve habitats/linkages through development and this is reflected in the draft site development brief. The Reporter agrees with the Environmental Report which highlights that the protection and retention of trees along the north-east boundary would be required to protect the landscape setting and views of the conservation area.
TT6 Kingslaw, Tranent	<ul style="list-style-type: none"> The site was not examined – no outstanding representations
TT7 Macmerry North	<ul style="list-style-type: none"> The Reporter concludes that the site will not dominate the settlement and will round off the north-western settlement edge.

TT8 Macmerry Business Park East	<ul style="list-style-type: none"> The site was not examined – no outstanding representations.
TT9 Gladsmuir East, Tranent	<ul style="list-style-type: none"> Access to the site will be determined through assessment of a planning application, however the Reporter recognises that the draft development brief identifies that a new access must be created on the north site of the A198 road.
TT10 Limeylands Road, Ormiston	<ul style="list-style-type: none"> The Reporter concludes that it is important for Proposal TT10 to continue to refer to the need for the masterplan and links with the site development brief.
TT11 Elphinstone West, Tranent	<ul style="list-style-type: none"> No comments from the Reporter.
TT12 Woodhall Road, Pencaitland	<ul style="list-style-type: none"> The Reporter concludes that the Council has followed a robust site assessment and notes that the draft development brief provides criteria which will be considered, including; the site access must be taken from Woodhall Road, a requirement for landscaping along the eastern boundary, that buildings along the eastern edge must be set back and have a varied building line, residential amenity must be safeguarded and the western boundary should be a hedgerow.
TT14 Park View, Pencaitland	<ul style="list-style-type: none"> The Reporter is satisfied that this site is suitable as a housing allocation and makes a number of references to the draft brief, in particular, highlighting how the draft brief deals with some of the issues raised in representations to the Local Development Plan. The Reporter concludes that the draft site development brief identifies that the development of the proposed access point will result in the loss of some trees that are subject to Tree Preservation Orders. To compensate for this loss, the development brief requires that specimen trees will be required to be replanted on either side of the new access, taken from the B6355 road. The brief also identifies that the mature trees on the southern and western boundaries of the site must be safeguarded as part of the future development of the site.
TT15 Humbie North, Tranent	<ul style="list-style-type: none"> The examination report recommends that the Council remove housing allocation PROP TT15 (Humbie North) from the plan and delete Paragraph 2.105 (modification 10). The Reporter concludes that the site is not suitable for housing development at this time. The scale of the proposed site is excessive and would almost double the size of the village, which has limited services, therefore it would not relate reasonably to the rest of the village.
TT16 East Saltoun, Tranent	<ul style="list-style-type: none"> The examination report recommends that the Council remove housing allocation PROP TT16 (East Saltoun) from the plan and delete Paragraph 2.106 (modification 11). The reporter concludes that the site is not suitable for housing development at this time. East Saltoun is a small rural village with very limited services. The proposal would significantly increase the size of the settlement. The proposal may have significant impacts on the character of the village and on the Conservation Area. There are limited services and no evidence to suggest that the proposal is needed to sustain the number of pupils at the primary school.
HN2 Letham Mains Expansion, Haddington	<ul style="list-style-type: none"> The reporter recognised that future development should respect the character of the area and notes that the Council has prepared a draft development brief which requires the site to be designed in a way which reflects the surrounding area, for example with large plots, to a similar scale to the small holdings, required along the frontage with the A6093 road. The Reporter also refers to the draft brief in relation to the retention of Letham Burn.

HN8 Peppercraig, Haddington	<ul style="list-style-type: none"> The Reporter notes the prominent location of the site.
DR2 Hallhill North, Dunbar	<ul style="list-style-type: none"> The Reporter is satisfied that there is sufficient justification for the underpass and that it would benefit residents, including those of site DR2.
DR4 Brodie Road, Dunbar	<ul style="list-style-type: none"> The site was not examined – no outstanding representations.
DR7 Spott Road, Dunbar	<ul style="list-style-type: none"> The site was not examined – no outstanding representations.
DR10 Innerwick East, Innerwick	<ul style="list-style-type: none"> There is no basis to prefer an alternative site. Issues raised in respect of development, such as traffic speeds, limited bus service should not obstruct the proposal. There is capacity at the school.
NK7 Saltcoats, Gullane	<ul style="list-style-type: none"> The Reporter observed that whilst Proposal NK7 is a visually prominent site, primarily as a result of its size, with appropriate landscaping, as defined within the draft site development brief, the site will be able to be satisfactorily integrated into the landscape.
NK8 Fentoun Gait East, Gullane	<ul style="list-style-type: none"> The Reporter recognises that the draft site development brief requires the layout and orientation of the houses, streets and spaces to be designed to incorporate and frame southerly views of the Lammermuir Hills and easterly views to North Berwick Law.
NK9 Fentoun Gait South, Gullane	<ul style="list-style-type: none"> The Reporter concludes that proposal NK9 will comprise the logical rounding off of the south east of the settlement and the draft site development brief requires the eastern and southern boundaries of the site to comprise an appropriate landscape edge. The Reporter makes reference to the access arrangements contained in the Development Brief and makes no modifications in respect of a representation citing poor access.
NK10 Aberlady West, Aberlady	<ul style="list-style-type: none"> The Reporter is satisfied that the site is suitable for inclusion for residential development.
NK11 Castle mains, Dirleton	<ul style="list-style-type: none"> The Reporter states that it will be possible to design a scheme which takes the local context fully into account and does not adversely affect the heritage assets, particularly taking account of the development criteria contained within the draft Development Brief for the site.