



local development plan main issues report 2014

The Main Issues Report sets out the options for the Local Development Plan



The Interim Environmental Report assesses the options identified in the Main Issues Report

Appendices 4-9 assess potential development sites in each part of East Lothian



The Monitoring Statement provides an evidence base for the Main Issues Report



Access all the Main Issues Report documents and other information at **www.eastlothian.gov.uk/ldp**

The Transport Appraisal assesses transport implications of the Main Issues Report

Foreword

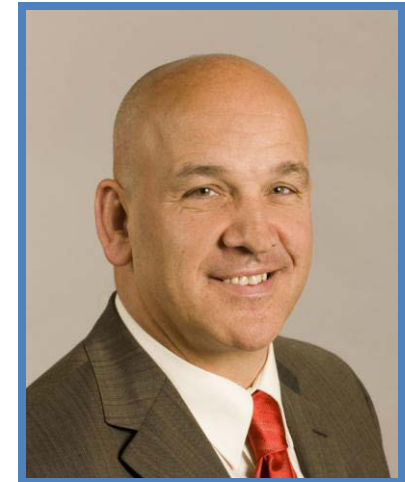
East Lothian is a hugely attractive place to live with countryside and coast, a vast amount of cultural and natural heritage and settlements of different sizes and character. The area is facing great change in its population, economy and way of life, which will affect all of us who live here and the towns and villages we live in.

It is vitally important that we conserve East Lothian's special qualities for future generations. But at the same time it is important to provide opportunities to help grow and diversify East Lothian's economy and to create more jobs. Significant population growth is expected to continue in the area and we need to help ensure that the Scottish Government's requirement for new homes in East Lothian by 2024 can be met. We also need to maintain high quality services and infrastructure, taking into account the needs of our growing population.

The Local Development Plan sets out the Council's planning strategy and policies to guide and manage future development in East Lothian. It will replace the East Lothian Local Plan 2008 and it has to be reviewed at least every five years to update the planning strategy and policies and to find appropriate additional land for new development. Whilst there are elements we must include in our new Local Development Plan as required by the Scottish Government, there are also aims we have for East Lothian, such as growing our economy and addressing issues of inequality in the area.

This Main Issues Report is the first formal stage leading to the preparation of a new Local Development Plan for East Lothian. Importantly, this Main Issues Report is not the final Local Development Plan. It is a consultation document setting out ideas for how the area might develop in future and it has been prepared specifically to seek your views.

It is important that as many people as possible get involved in the consultation and help us shape the future of East Lothian for the next 10 years and beyond.



Councillor Norman Hampshire
Spokesperson for Environment

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1 Introduction

The Development Plan

- 1.1 This Main Issues Report (MIR) is the first formal stage in the preparation of the East Lothian Local Development Plan (LDP). Once approved, the LDP will form part of the statutory Development Plan for East Lothian. The other part of the Development Plan will be the higher level Strategic Development Plan (SDP) for Edinburgh and South East Scotland, which is prepared by SESplan¹.
- 1.2 All applications for planning permission are assessed against the Development Plan. It provides a framework against which proposed changes in the use of land and buildings can be assessed. It shows where proposals for new development such as housing, business and retail will be supported and where they will not. The Development Plan should be reviewed at least every five years to update the planning policy and strategy approach and to find appropriate additional land for new development.
- 1.3 The Development Plan for East Lothian currently comprises *The Strategic Development Plan for Edinburgh and South East Scotland* (SDP), read together with *The East Lothian Local Plan 2008* (ELLP2008). The SDP sets out the strategic planning requirements for an area comprising the City of Edinburgh, East Lothian, Midlothian, West Lothian and Scottish Borders Council areas, and the southern part of Fife Council area. The ELLP2008 was prepared by East Lothian Council and it provides more detailed and site-specific planning policy for its area. However, the ELLP2008 was prepared under a previous strategic plan, the Edinburgh and the Lothians Structure Plan 2015, which Scottish Ministers have now replaced with the new SDP.
- 1.4 Recent changes in Scottish planning legislation and policy required the former Edinburgh and the Lothians Structure Plan 2015 to be replaced by the SDP. These same changes require the ELLP2008 to be replaced by a new Local Development Plan (LDP) for East Lothian. The new Local Development Plan for East Lothian must by law conform to the SDP, including providing for its development requirements and complying with its high level spatial strategy and planning policies.

¹ Strategic Development Plan (June 2013) prepared by the Strategic Development Planning Authority for Edinburgh and South East Scotland (SESplan) and approved by Scottish Ministers by letter dated 27 June 2013

Main Issues Report Purpose

- 1.5 The MIR provides the basis for public consultation on the preparation of the LDP as required by the Town and Country Planning (Scotland) Act 1997 (as amended). The MIR sets out potential proposals for development in East Lothian, including where new development should and should not occur, and other approaches which are a reasonable alternative (or alternatives) to these. It also highlights the ways in which these emerging preferred and alternative proposals differ from those of the ELLP2008. In addition, it reviews the policies of the current ELLP2008 and considers if they remain valid for inclusion the LDP, if any change in approach should be considered or if new policies should be introduced.
- 1.6 The MIR is not a draft of the LDP; rather it focuses on key changes and the big ideas for future development taking in to account the environmental and infrastructure opportunities and constraints in the area. A main challenge will be how the LDP can align its development proposals with available infrastructure capacity / ability to provide additional infrastructure capacity and with the funding and delivery solutions that will be required to allow new development to take place. The purpose of this MIR is to stimulate discussion and seek opinion on what should and should not be included in the LDP. The feedback from the consultation on the MIR will be taken in to account as the Council finalises its Proposed LDP (see paragraph 1.11).
- 1.7 The MIR focuses on where there is a need and opportunity for the LDP to change the development strategy and policies of the current ELLP2008, where there is a genuine choice so to do. However, where a certain course of action must be followed, or where no change is necessary from the current local plan, or where there will be no significant environmental or other effect of a proposed change, this is identified but with limited discussion. In relation to potential minor policy changes, these are discussed in the Monitoring Statement which is published alongside this MIR. The potential minor policy changes are also listed at Appendix 6 of this MIR.

Supporting Documents

- 1.8 The Council has published two primary supporting documents with the MIR. The primary documents are the Monitoring Statement (MS) and the Interim Environmental Report (IER). The MS is a key part of the evidence base for the LDP, and the IER has been prepared in line with the Environmental Assessment (Scotland) Act 2009.
- 1.9 The MIR has been prepared in parallel with these supporting documents and to ensure it remains focused, cross references are made between them where appropriate. As well as finalised versions of these supporting documents, the Proposed LDP will be accompanied by an Action Programme. It will set out what actions are needed to deliver the plan, and this will be kept under review at least every two years from the point the LDP is adopted.

Consultation

1.10 The MIR is published for formal consultation. This will last for 12 weeks from **Monday 17th November 2014** until **Sunday 8th February 2015**. To secure efficient use of resources the Council is keen to promote electronic working wherever possible. **It strongly encourages comments on the MIR to be submitted online via the Council's Consultation Hub**, the address for which is provided below. If you are unable to respond in this way you may email or write to the other relevant addresses provided below. **The online consultation will automatically close at 23.59 on Sunday 8th February 2015**. To allow for delivery timescales, any hard copy responses will be accepted until noon on Monday 9th February 2015.

Consultation Hub:	www.eastlothianconsultations.co.uk
Email:	ldp@eastlothian.gov.uk
Written Responses:	Policy & Projects Development Partnerships and Services for Communities East Lothian Council John Muir House Haddington EH41 3HA

Next Steps

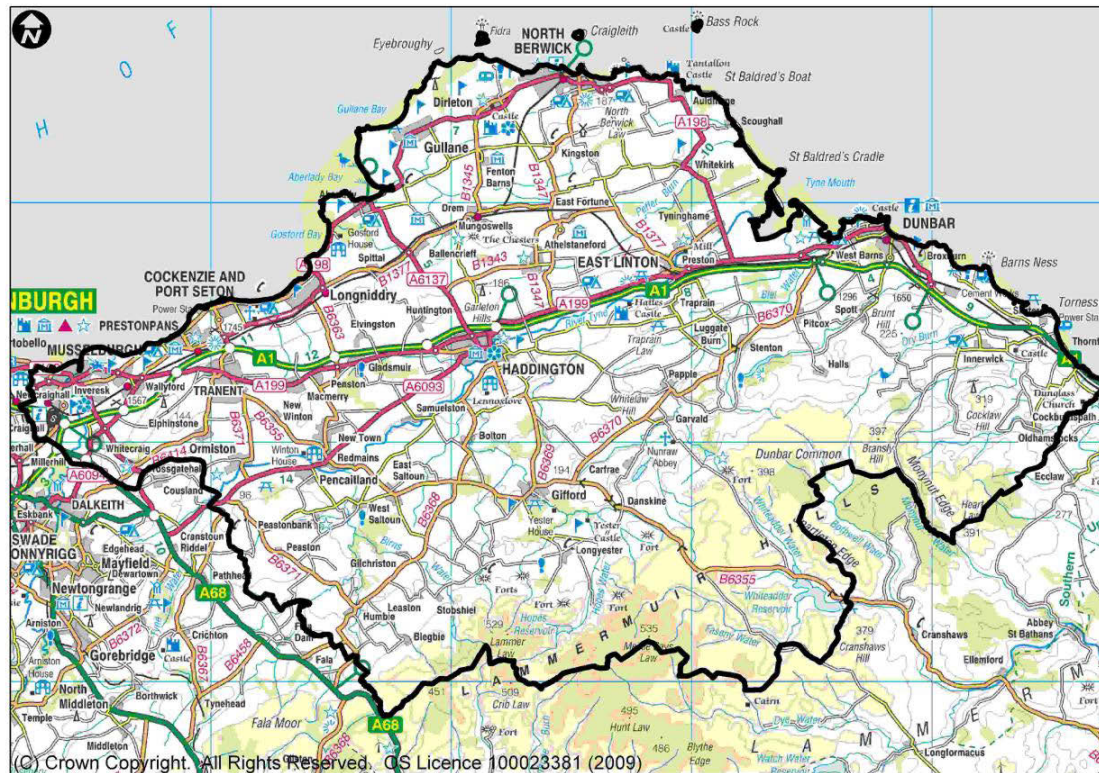
1.11 The Council will consider responses submitted within the above consultation period, prior to preparing the Proposed LDP. The Proposed Plan will confirm the Council's settled view on the overall spatial strategy for development in East Lothian as well as the planning policies and proposals to facilitate delivery and guide future development in the area. The Proposed LDP will be published for formal representations. If there are unresolved representations, then the issues they raise will be considered at the Proposed LDPs Examination by a Reporter from the Scottish Government's Directorate for Planning and Environmental Appeals. The Reporter's recommendations on the representations considered at the Examination will be largely binding on the Council². The Proposed LDP, incorporating any recommendations as appropriate, will then be adopted by East Lothian Council, at which time the East Lothian Local Development Plan will formally replace the East Lothian Local Plan 2008.

²Scottish Government Circular 6/2013 paragraph 92

2 East Lothian: The Place

Spatial Context

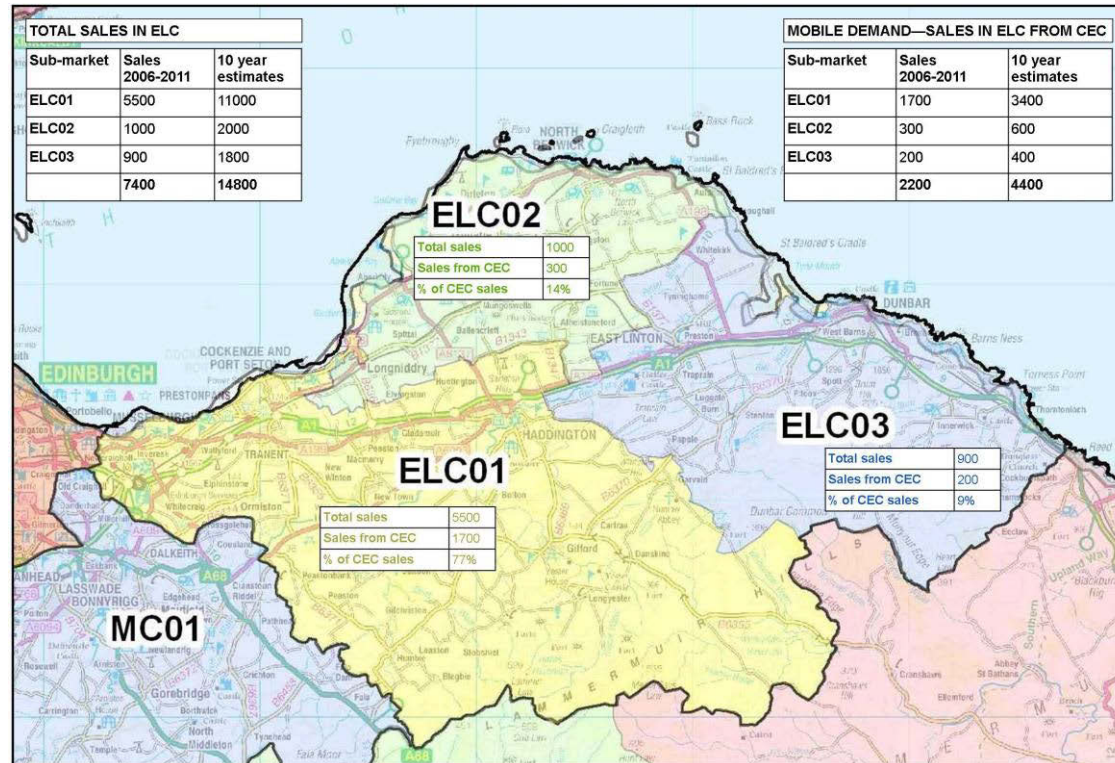
- 2.1 East Lothian is within the Edinburgh city region, which also includes the Council areas of Edinburgh, West Lothian, Midlothian, Scottish Borders and the southern part of the Fife Council area. East Lothian is located to the east of Edinburgh's suburban edge. It measures approximately 270 square miles in area, and includes 43 miles of coastline. East Lothian has six main towns and extends from Musselburgh in the west to Dunbar and beyond to the area's administrative boundary with Scottish Borders in the east. To the south are the Lammermuir Hills and to the west are the Midlothian and City of Edinburgh Council areas. The Firth of Forth and East Lothian's attractive coastline are to the north.
- 2.2 East Lothian contains a wide variety of landscape types, cultural and natural heritage assets as well as historic towns and villages. It also has a significant amount of prime quality agricultural land. The area's economy was built on agriculture, fishing, coal mining and manufacturing. Today, all of East Lothian is within Edinburgh's wider travel to work area. Although East Lothian is a firm part of Edinburgh's labour market area, its local economy has also diversified. The main employment sectors are in education, public administration, health and manufacturing. Primary industries such as agriculture and fishing remain important and tertiary industries, such as construction, biotechnology, food and drink and the service sector, including finance and retailing, have also developed. Tourism is also a significant contributor to the local economy and continues to grow in importance. The establishment of Queen Margaret University to the west of Musselburgh is a real asset in the area and associated spin off opportunities are emerging. Edinburgh College also has an aspiration to establish a presence in East Lothian.
- 2.3 The 2011 Census indicates that Musselburgh is East Lothian's largest settlement (pop. 19,133 (incl Wallyford 22,264)). Although closest to the city Musselburgh had the slowest rate of population growth (7%) between 2001 and 2011 in comparison to the rest of East Lothian (10.7%). The other main settlements in the west of East Lothian are Tranent (11,565), Prestonpans (9,140) and Cockenzie / Port Seton (5,545). The Edinburgh Green Belt extends eastwards from Musselburgh up to the western edges of Tranent and Prestonpans and surrounds Wallyford, Whitecraig and Old Craighall. The western part of East Lothian contains more than half of East Lothian's population. The west of East Lothian is the most accessible part of the area and is also where there is most regeneration potential. The principal towns further east are Haddington (8,978), Dunbar (8,293) and North Berwick (6,455). The settlement pattern in the east is more dispersed than in the west and there are few regeneration opportunities. Although Musselburgh is the largest town, Haddington is East Lothian's administrative centre.



2.4 East Lothian is also part of the wider Edinburgh housing market area; however, East Lothian has 3 sub-housing market areas of its own³. These are 1) Musselburgh to Haddington in the west; 2) Dunbar and surroundings in the east; and 3) North Berwick and coastal settlements to the north. In the five years between 2006 -2011 a total of around 7,500 house sales took place in East Lothian. Approximately 70% of these sales occurred in the western sub-market area alone. Additionally, around 75% of all purchasers moving from Edinburgh to East Lothian (mobile demand) bought a home in the western sub-market area. In the same period around 15% of house sales in East Lothian occurred in each of the North Berwick and coastal

³ SESplan Housing Market Area Assessment October 2013

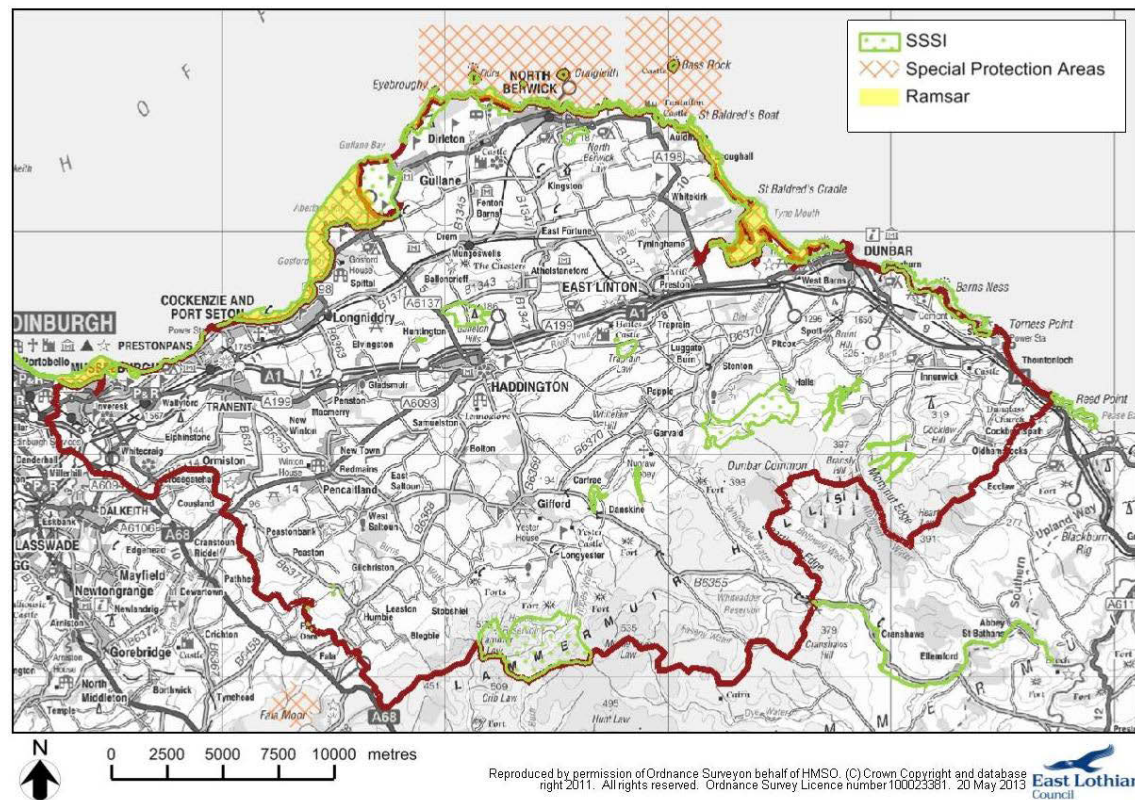
settlements and Dunbar and surroundings sub-market areas. The scale of mobile demand from Edinburgh moving to the eastern and northern sub-market areas is significantly less than in the west, representing around 15% and 10% of all house sales in those sub-market areas respectively.



2.5 East Lothian's main towns provide the widest range of local services, facilities and employment opportunities in the area and are service hubs for the smaller settlements around them. The A1 (T) and East Coast Main Line directly connect the main towns in the west as well as Haddington and Dunbar to the rest of the city region and beyond, including via public transport. While North Berwick benefits from its branch railway line, it is not as well connected via the strategic road network and via bus based public transport. The wider range of jobs, services and facilities available in other parts of the city region are also closer to the main towns in the west of East Lothian, meaning less distance need be travelled between them.

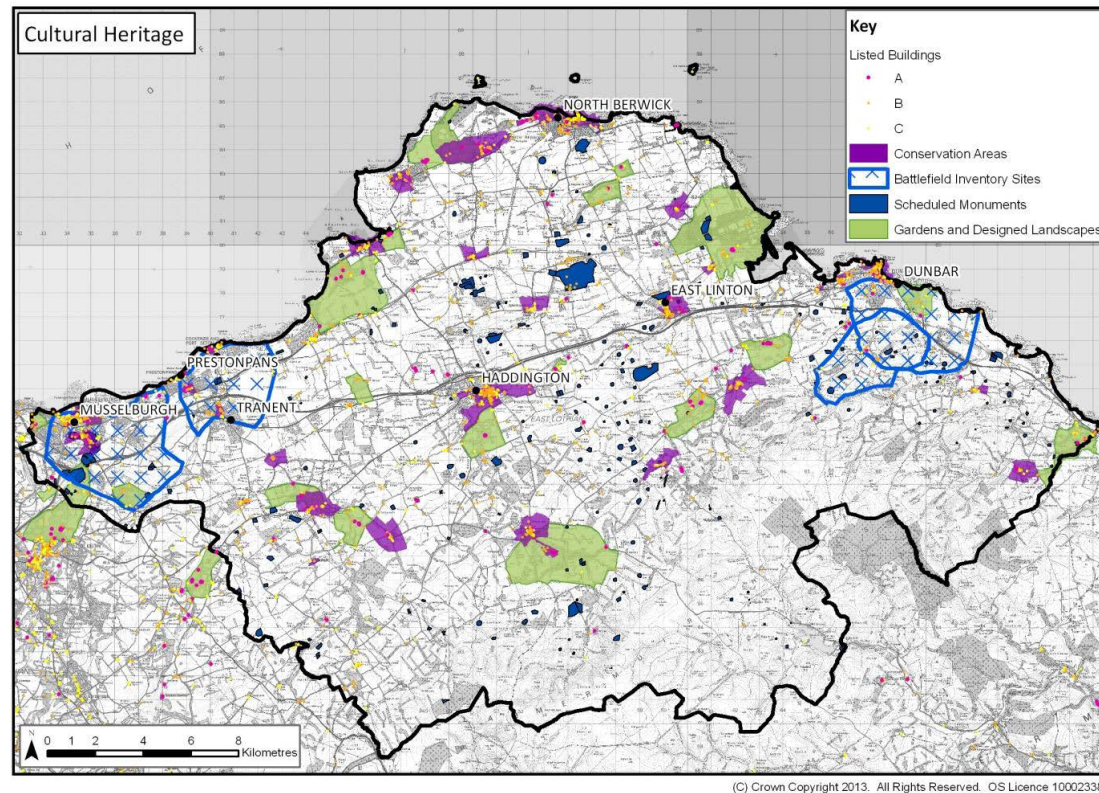
Landscape, Cultural & Natural Heritage

- 2.6 East Lothian is an area of varied and attractive landscape character comprising countryside and coast with a central agricultural plain framed by the backdrop of the Lammermuir Hills. This landscape is interspersed with historic towns and villages as well as prominent physical features such as the Garleton Hills and North Berwick and Traprain Laws as well as designed landscapes and other historical sites, buildings, landmarks and monuments. The A1 (T) Trunk Road and the East Coast Main Line pass west to east through the centre of the area with the North Berwick branch line to the north.



- 2.7 The Tyne and Esk rivers and smaller isolated water courses drain the area. Aberlady, Gullane and Belhaven Bays, together with the beaches along the coastal strip, are landscape features that provide important amenity as well as visitor and leisure tourism attractions. They are also significant habitat resources for protected species and biodiversity of national and international significance. The Firth of Forth shoreline and islands are Special Protection Areas (SPAs), and the inland area to the south is an important feeding ground for protected species. There are also many Sites of Special Scientific Interest (SSSIs), numerous local wildlife sites and other areas of biodiversity value.
- 2.8 The main water courses and the Biel Water have a history of flooding of both agricultural and non-agricultural land. While the quality of the water environment in East Lothian is generally good, there are some locations where there is scope for improvement, particularly as a consequence of agricultural run-off. Much of the agricultural land is prime quality, and there are also carbon rich and rare soils such as peat in the area. The landscape is predominately one of large and generally flat fields that provide long distance views across the countryside and coastal plain and its landmarks to the Firth of Forth and beyond. Retaining a setting for settlements and ensuring appropriate edge treatment has helped maintain landscape character and identity. The Edinburgh Green Belt has a role in managing this in the west of East Lothian. However, some areas of green belt land have been identified as making a more limited contribution to green belt objectives and parts of it are also highly accessible by a range of transport modes.
- 2.9 Due to its topography, East Lothian was a historic invasion route from the north of England. As a result there are many historic battle sites, encampments, castles and fortifications in the area. Some of these reflect periods of significance in European and Scottish history as well as phases of technological military advancement. East Lothian also played a key role during World Wars I and II through its wartime airfields at East Fortune, Macmerry and Drem. East Lothian's more recent history of agricultural improvement left a legacy of fine rural buildings and a cultivated landscape. Most of the industrial landscape scars from mining in the western coal field have been remediated. East Lothian's settlements established and have grown and evolved in this context, whether because of harbours or minerals or the quality of agriculture. Other settlements located at river crossings or where fast moving water offered energy for industry. Often, smaller settlements developed around farmsteads, fortifications, parish churches and manse, while some were planned by estate managers to house farm workers during agricultural improvement. Roads and railways including several branch lines were introduced to connect the area to market, although only the North Berwick branch line remains.
- 2.10 The diversity of settlements in East Lothian developed either in harmony with their surroundings or in response to the area's economic activities and connections to the areas around it. This is reflected in the layout of East Lothian's settlements, their architectural styles and in the indigenous materials used for building. Some buildings have fallen into disuse and planning policy has encouraged them to be converted to new uses, and so retaining and enhancing the quality of the local landscape rather than allowing them to be replaced with new buildings. Many large estates remain intact with their designed landscapes, fine houses, gateways, boundary stone walls and planting, and they continue to be important landscape

features. There are few locations where further landscape improvement would be beneficial, with most areas of previous mining activity rehabilitated. The network of former railway routes is included as part of the area's core path network and they offer access and active travel opportunities for residents and visitors alike through the countryside and green belt.



2.11 East Lothian has a high proportion of designated cultural heritage including listed buildings, conservation areas, scheduled and unscheduled archaeology, designed landscapes and historic battlefields. These characteristics and built and natural heritage assets are all integral to East Lothian's sense of place, distinctiveness and identity, as well as its desirability as a high quality place to live, do business, work, for recreation and to visit.

Population & Households

- 2.12** The 2011 Census indicates that East Lothian's total usually resident population was 99,717, an increase of 10.7% per cent over the equivalent 90,100 figure at 2001. This confirms a trend of steadily increasing population that has been evident since the mid/late 1980's. The population of East Lothian accounts for 1.9 per cent of the total population of Scotland (5,295,403).

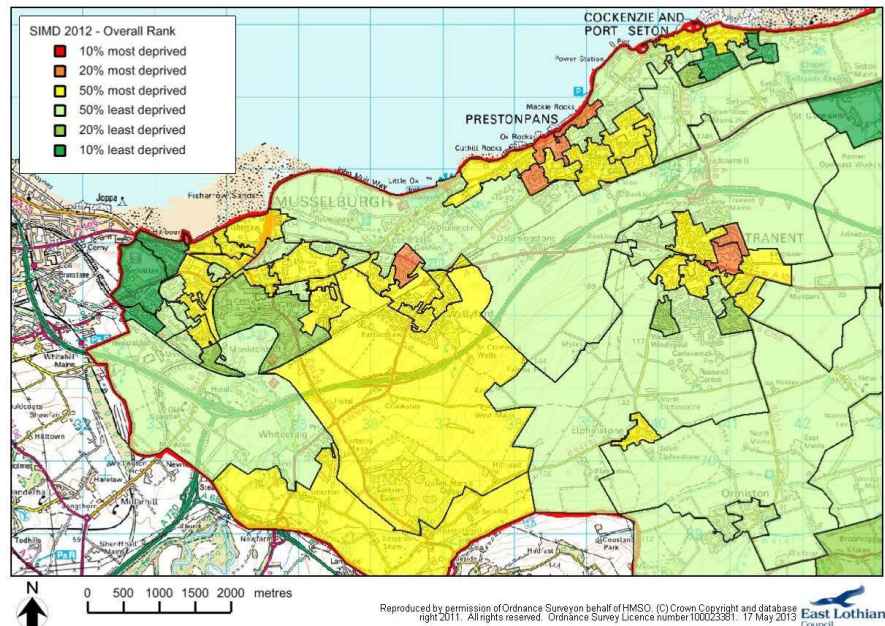
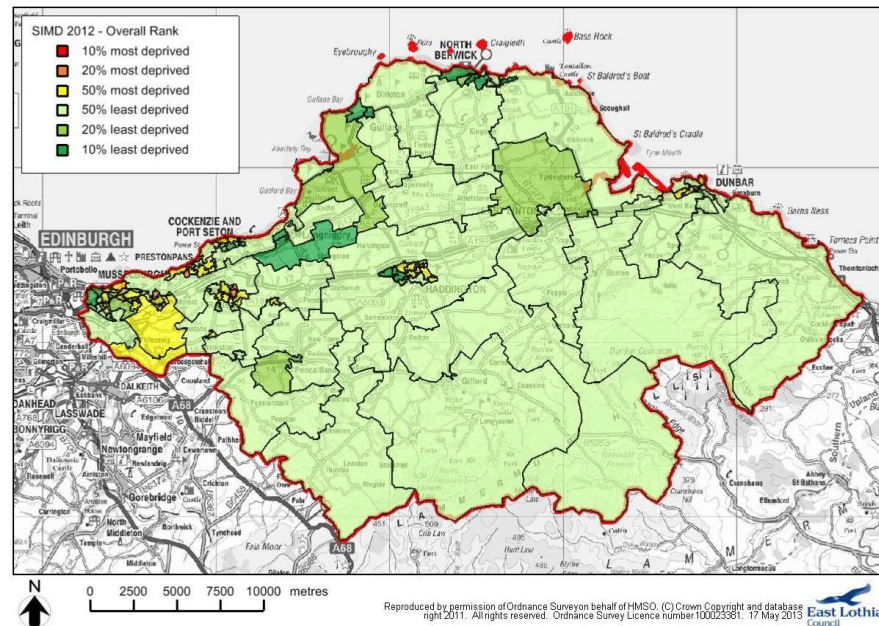
Table 1: Age Groups as Percentage of Total Population							
	0-4	5-14	15-24	25-44	44-64	65-74	75+
East Lothian	5.9	11.5	11.8	24.4	28.6	9.5	8.3
Scotland	5.5	10.6	13.1	26.5	27.5	9.1	7.7
Source: 2011 Census							

- 2.13** The National Records of Scotland 2010 population projection (published 2012) anticipates that by 2035 East Lothian's population is projected to increase by 33% to around 129,229, the highest percentage rate of growth in Scotland during this period. Around 30% of this is expected to be natural change, whereas 70% is expected to be net in-migration. This is largely as a result of the area's proximity to Edinburgh and because it is part of the wider Edinburgh Housing Market Area. East Lothian is expected to experience the greatest increase in the 0-15 age group in Scotland, with an increase of 38%. East Lothian's working age population is also expected to increase at the highest rate in Scotland, with growth of 29%. The pensionable age population is expected to increase by 43%, and the number of people aged over 75 is expected to increase by 95%. The population is projected to grow across all age groups and this will increase demand for infrastructure, facilities and services in East Lothian, such as education, road, rail and transport links, including public transport, and health care, etc.
- 2.14** The 2011 Census indicates that in East Lothian there are 42,910 households. Compared with the Scottish average, East Lothian has a significantly smaller proportion of single person households but a greater proportion in all others. Yet the 2010 household projection indicates that by 2035 there will be a 70% increase in single person households in East Lothian, with 33% of households being single person, 7% being one adult with one or more children, 33% being two adult with two or more children, 21% being two or more adults with one or more children and 7% with 3 or more adults.

Table 2: Household Sizes as Percentage of all Households					
	1 person	2 person	3 person	4 person	5+ person
East Lothian	30.6	35.4	15.7	13.4	4.9
Scotland	34.7	34.0	15.1	11.5	4.7
Source: 2011 Census					

Socio Economic Profile

2.15 The Annual Business Inquiry shows that between 1998 and 2008 the area experienced growth in the service, construction and tourism sectors, but a decline in manufacturing. Between 2008 and 2012 the Annual Business Survey (updated August 2014) indicated there has been increased activity in manufacturing (+4.5%), wholesale and retail trade (+8.4%) and in the tourism sector. Importantly, there has also been a significant decline in construction over the same period (-35%). Out of work benefits issued in the area (Job Seekers Allowance) at 2010 stood at 3.3%, below the Scottish average of 4.3%. The 2006 claimant count also showed that the area had a low unemployment rate at 1.7% and ranked 28th out of Scotland's 32 local authority areas at that time, but by 2011 this figure increased to 4.1% and was ranked 17th among them.



- 2.16** Educationally, 81% of the population has NVQ1 level and above (Scotland 80%), and 32% has NVQ4 and above (Scotland 35%). Of the working age population 61,200 (78%) are economically active (Scotland 62%)⁴. The split of full time (65%) and part time (35%) employee jobs (excl self-employed, HM Forces, government and trainees) is generally consistent with Scotland as a whole. The same applies to the positions held, of which 40% were managerial, professional and technical, 24% were administrative, skilled trades and secretarial occupations, 17% were personal services, sales or customer services occupations, and 19% were machine operatives, etc. Based on 2009 data, the Scottish Indices of Multiple Deprivation (SIMD) shows parts of Musselburgh, Prestonpans, Tranent and Haddington as among the most deprived 15% in Scotland in relation to one or more of the SIMD indicators of education, health, housing, crime, income or employment.
- 2.17** At 2009, around 30,000 jobs were available in East Lothian (for around 60,000 people of working age), resulting in a job density of 0.5, compared to the Scottish and GB average of 0.78. In comparison to other parts of the city region in terms of relative accessibility via national and international modes of transport, East Lothian has been a less preferential location for attracting large scale economic development / employment opportunities despite the allocation of land for business and employment use. The 2011 Census indicated that of the 48,579 people aged 16 -74 in employment around 28,855 of them commute to work via car, van or motor cycle (around 31,000 at the 2001 Census). At 2010, 21,700 (50.5%) of 16 – 64 year olds in employment lived and worked in East Lothian, with 21,000 people (48.8%) commuting out of the area for employment⁵; around 5,300 people commute into the area for work. This demonstrates the link between the size of the working age population, the availability of jobs in the area (job density) the commuting travel pattern and the capacity issues in the transport network.
- 2.18** While East Lothian has a qualified labour force across all sectors, there are pockets of deprivation. There is a mismatch between the size of the labour force and the availability of jobs in the area, resulting in increasing out-commuting. Recent economic conditions have also increased unemployment.

Transport Network & Services

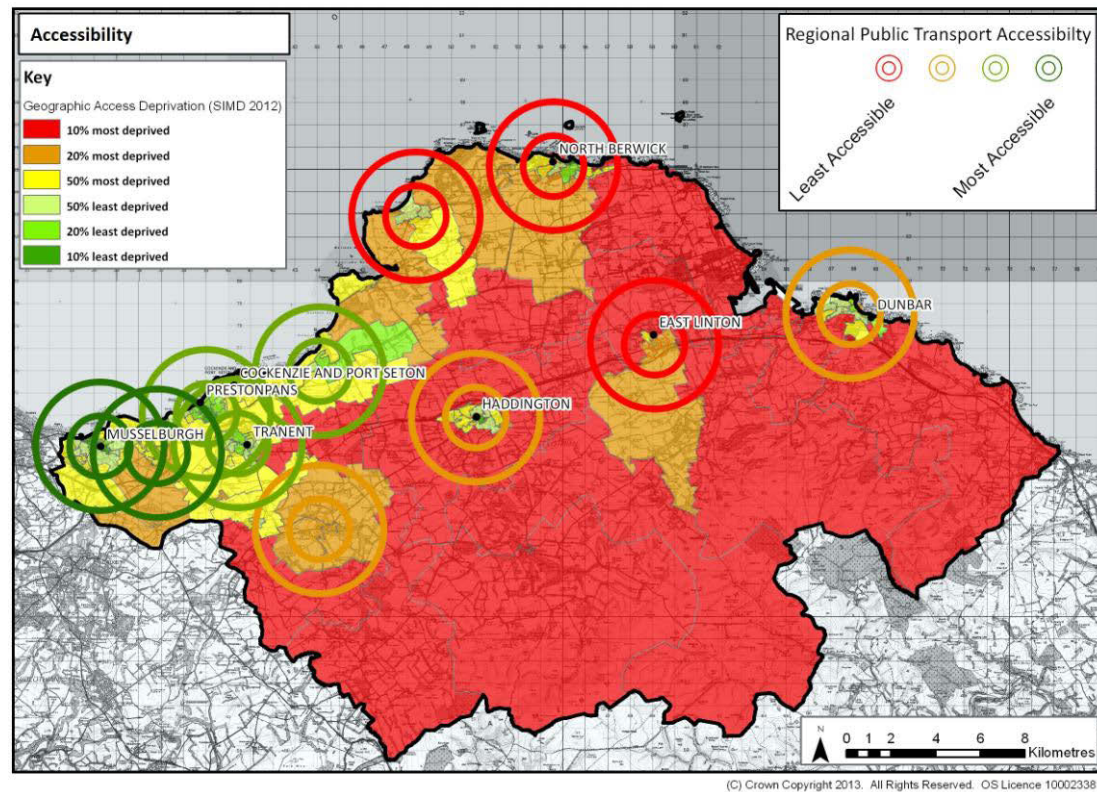
- 2.19** Alongside East Lothian's landscape characteristics and its cultural and natural heritage assets is the infrastructure that supports its resident's way of life and how visitors access and use the area. The A1, the East Coast Main Line and the North Berwick Branch Line are the main transport corridors. The A1 has a junction with the A720 Edinburgh City Bypass at Old Craighall and a number of interchanges along its length that provide access to settlements, other destinations and routes. The A1 has also been improved with dualling of the A1 Expressway between Haddington and Dunbar,

⁴ Office for National Statistics Annual Business Inquiry 2008

⁵ Annual Population Survey 2010: Local Area Labour Markets in Scotland (Part 4 Table 1.4)

which has increased accessibility and reduced journey times for road based transport. However, more could be done to improve cross border connections, including dualling the A1 to the Scotland – England border; consideration is being given to duelling the A1 south of the Scottish border.

2.20 While East Lothian is relatively well served by the strategic transport network, particularly west / east, the west of the area is the most accessible. However, there is an underlying problem of lack of capacity in transport infrastructure and in local transport services, particularly those extending to the north and south. These factors are particularly relevant in view of anticipated population growth and because travel demand is expected to increase in the coming years, issues that will exist without factoring the impacts of planned growth that is yet to be delivered.



- 2.21 Trunk road and local road network capacity is already an acute problem, particularly in the west of East Lothian. Existing constraints have been highlighted on the A1 (T), in particular at Old Craighall Junction and generally at all interchanges west of the Gladsmuir Interchange. Transport Scotland is of the view that these capacity constraints alone will constrain any further development from being delivered in the area until solutions are found and are committed to be put in place. It is currently conducting a regional study to establish these solutions. However, funding and delivery mechanisms need to be identified and it is expected that developer contributions will have a significant role to play. It is anticipated that the findings of the regional study and others will inform the LDP on trunk road and local road network interventions and the need for developer contributions.
- 2.22 The capacity of Old Craighall junction is a particular issue which has the potential to impact on road safety in future. Transport Scotland has indicated that all improvements to the trunk road must be secured and that no development should commence until such time as an agreed funding mechanism or full funding is in place for as yet to be fully designed and costed projects. While Transport Scotland has suggested it would be willing to allow some development to come forward in advance of any interventions being completed, this is on the proviso that it can be satisfied there is a funding mechanism in place that would allow capacity constraints to be overcome in the future as a result of the cumulative impact of development. Confirmation on the nature and costs of required trunk road and local road network interventions, the mechanism by which developer contributions may be gathered and the organisation(s) that will have responsibility for collecting these shall need to be clarified for the Proposed LDP.
- 2.23 The rail network through East Lothian currently has limited capacity with utilisation of the East Coast Main Line affecting scheduling for local services on it as well as those from the North Berwick Branch Line. Any confirmed longer term vision for high speed rail connections on other lines may release capacity on the East Coast Main Line. Currently, six rail halts are located on the main line at Musselburgh, Wallyford, Prestonpans, Longniddry, Drem and Dunbar, with North Berwick Station on the branch. There are also new station safeguards in the current local plan at Musselburgh (for a 'Parkway' station concept), East Linton and Blindwells. A bid is currently being progressed by the Council to seek part funding from the Scottish Government to deliver a new rail halt at East Linton, but at the time of writing there is no commitment to Government funding.
- 2.24 Notwithstanding this, local trains are often full at peak times; while additional carriages would help the situation this may require the lengthening of existing station platforms to accommodate longer trains as well as a need to expand station car parks. A route for Tram Line Three adjacent to the proposed Craighall Business Park west of Musselburgh is also safeguarded in the City of Edinburgh Council's Second Proposed Local Development Plan (with the potential to be extended further), although little progress has been made on that project. Commuting bus services are busy at peak times and those to the city are more numerous and frequent in settlements in the west of East Lothian than those in the east, as Lothian Buses only operate in the west of the area. While local bus services serve the main settlements as well as those in the countryside, their number, frequency and integration with other public transport modes could be improved. In a deregulated transport system the Council is limited in what it can do to assist service provision. First Buses decision in 2012 to withdraw/amend a number of local services highlights this situation.

- 2.25 East Lothian's transport network and services are experiencing capacity constraints which are compounded in the west by commuting travel patterns from the east causing issues 'down line' in the morning and afternoon peak times. These existing capacity constraints have been caused by the cumulative impact of population growth in, and commuting through and from, the area. Impacts are anticipated from further developments planned in East Lothian and also the areas around it, requiring suitable interventions to be delivered to minimise capacity constraints.

Air Quality

- 2.26 In Musselburgh deteriorating air quality in the town centre has resulted in the designation of an Air Quality Management Area in the High Street. An Air Quality Action Plan is being prepared to improve air quality. In the short term measures such as altering the spacing and usage of bus stops is being considered. However, improvements to the bus fleet may also bring about a significant improvement in air quality. In the medium and longer term, further intervention may be required, potentially including a rebalancing of vehicle flows through the town. Tranent High Street is also an area where air quality is regularly monitored. A longer term option for Tranent may also be to consider the redistribution of vehicle flows in the town centre.

Infrastructure

Water & Drainage Capacity

- 2.27 To support development Scottish Water (SW) is funded to provide strategic capacity that may be required to increase the capacity for water supply / waste water treatment ('Part 4' assets) in association with development: where additional capacity is needed to bring forward development, developer contributions are not required.
- 2.28 However, where capacity is available in SW strategic assets there should be a preference to utilise it where appropriate as part of the planning strategy before distributing development to locations where new capacity need be provided to accommodate it. If new strategic capacity is required to facilitate development in the right place, it is necessary to consider how long it will take to deliver it and enable development. The implications of this on any programme of development must be considered. Normally the preference is to secure connections to SW networks. The consultation zones for SW strategic assets and their capacity status is provided below:

Table 3: Scottish Water Consultation Zones / Strategic Asset Catchments And Capacity Status

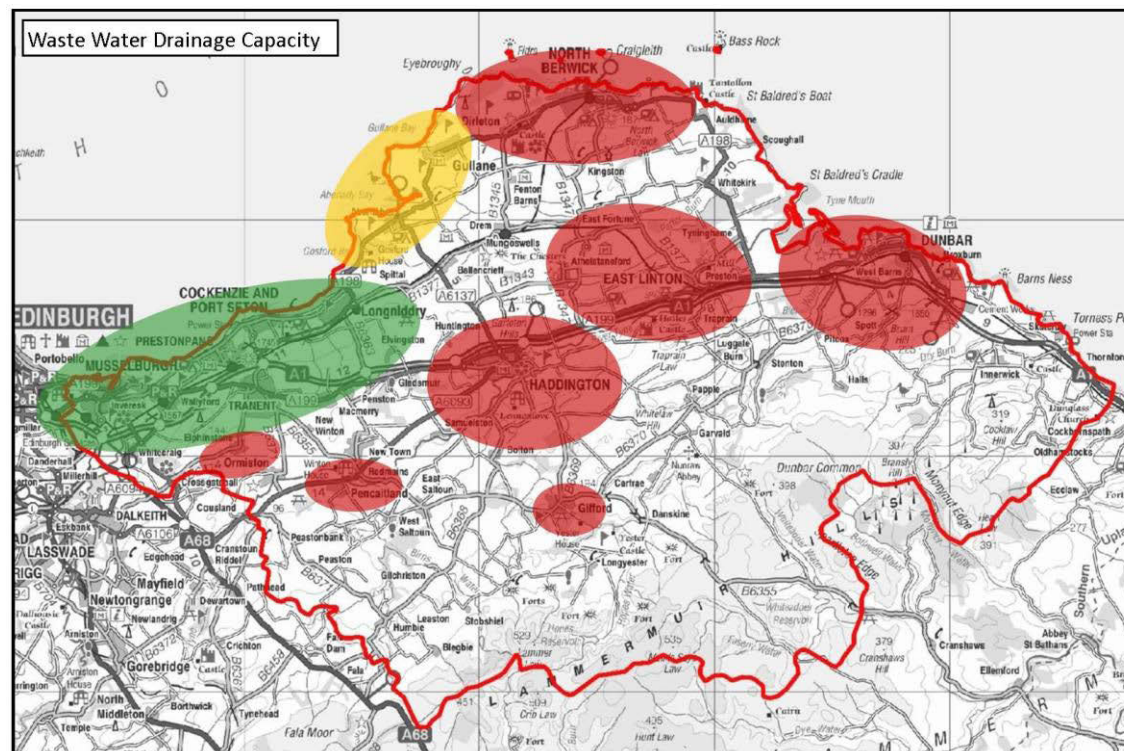
	Water Supply	Status	Waste Water	Status
Musselburgh / Wallyford / Whitecraig / Tranent	Rosebery / Glencorse / Castle Moffat	Capacity	Seafield WWTW	Available Capacity
Prestonpans / Cockenzie / Port Seton / Blindwells	Rosebery / Castle Moffat	Capacity	Seafield WWTW	Available Capacity
Ormiston	Rosebery	Capacity	Ormiston WWTW	Very Limited Capacity
Pencaitland	Rosebery	Capacity	Pencaitland WWTW	Very Limited Capacity
Elphinstone	Castle Moffat	Capacity	Ormiston WWTW	Very Limited Capacity
Haddington	Castle Moffat	Capacity	Haddington WWTW	Very Limited Capacity
Gifford / Bolton	Hopes	Capacity	Gifford WWTW	Very Limited Capacity
East Linton	Castle Moffat	Capacity	East Linton WWTW	Very Limited Capacity
Stenton	Castle Moffat	Capacity	Stenton WWTW	Limited Capacity
Dunbar	Castle Moffat	Capacity	Dunbar WWTW	Very Limited Capacity
West Barns / Dunbar	Castle Moffat	Capacity	West Barns Sep	Very Limited Capacity
Innerwick	Castle Moffat	Capacity	Innerwick WWTW	Limited Capacity
North Berwick / Dirleton	Castle Moffat	Capacity	North Berwick WWTW	Very Limited Capacity
Gullane / Aberlady	Castle Moffat	Capacity	Gullane WWTW	Limited Capacity
Athelstaneford	Castle Moffat	Capacity	Athelstaneford	Very Limited Capacity

2.29 Including all planned and committed development proposals, capacity exists at SW strategic assets serving settlements in the west of East Lothian. There are currently foul drainage constraints to further significant growth at Haddington, East Linton, Dunbar and North Berwick. While these constraints could be overcome with investment, this is not identified as a funding priority by SW at this time. SW would require its 5 growth criteria⁶ to be met before it could initiate any growth project.

2.30 At North Berwick, as a consequence of the foul drainage needs of strategic housing allocations at Mains Farm and Gilsland, the town's Waste Water Treatment Works (WWtW) is very near capacity. A 10,000 population limit is set on the current WWtW which has a catchment that includes Dirleton. To further significantly increase population here SEPA would require a step change in the type of treatment infrastructure. Scottish Water suggests that a £15m – £20m investment may be required. An increase in capacity at East Linton WWTW to accommodate an existing allocation at Orchardfield is subject to an Environmental Impact Assessment due to the existence of protected species in the area.

⁶ The Scottish Water (Objectives for 1st April 2010 to 31st March 2015) Directions 2009, Paragraphs 3(b) and 4 - <http://www.scotland.gov.uk/Resource/Doc/917/0088613.pdf>

2.31 The other items of water/waste water infrastructure required to enable development include new water mains or treated water storage tanks (Part 1, 2 and 3 assets or the 'local network') and on site pipe work. These remain the responsibility of developers to provide, although SW may make a contribution under the Reasonable Cost Contribution (RCC) provisions which in part act to mitigate such expense. Therefore, with the exception of Haddington, East Linton, Dunbar and North Berwick the water / waste water infrastructure issues in the area will likely be in relation to the Part 1 to 3 costs involved in mitigating any impact of the development on the local network. In some cases further investigation may be required in respect of water supply and / or a drainage impact assessment may be needed to ascertain impact of development on the local network.



- 2.32 Where there is no public water supply network within the vicinity, there would be a need either for a private water treatment system or to lay new water infrastructure to the existing public network, and early discussion with Scottish Water would be required. Where there is no public sewer network a private wastewater treatment system may be required and discussion with SEPA to discuss specific requirements would be essential.

Education Capacity

- 2.33 Ensuring the availability of sufficient education capacity is an essential part of the proper planning for new housing development. New housing places a demand for additional education capacity which can either be met by using available capacity at existing schools or, where none exists, by providing additional capacity either within an existing school or by providing a new school. Where no existing capacity is available, the Council expects developers to fund that amount of additional capacity that arises as a direct result of their proposed development, where appropriate on a cumulative basis with other proposals.
- 2.34 The costs of additional education capacity can place significant up-front costs on a new housing proposal. Schools can also only be expanded to a certain point – e.g. where either the accommodation or campus can be expanded no further, or the school would become of such a size that this could affect educational outcomes. Catchment reviews may help by redistributing demand but these bring their own challenges. Making use of existing capacity / the ability to make additional capacity available such as by expanding existing schools in an appropriate way will be a key driver of any planning strategy for new housing in the area.
- 2.35 The following is a summary of the current position with regard to education capacity in East Lothian. It is based on the catchments of the six existing secondary school clusters. The summary reflects the consideration that has been given at this stage to how facilities might be able to accommodate projected pupil rolls from existing housing sites and also how facilities may be able to expand further beyond their current capacities / committed expansions in order to maximise the education capacity that may be made available within the area.

Musselburgh Cluster

- 2.36 The extent and appropriateness of any significant expansion to Musselburgh Grammar will have a major influence on the amount of new housing that may be accommodated within its catchment area. The school currently has a capacity of 1,350 pupils and a restricted campus, with space for P.E. in the curriculum currently provided off site at Pinkie Playing Fields. To accommodate existing housing commitments in the schools' catchment area the expansion of Musselburgh Grammar beyond its existing capacity would be required. While there is physical potential for an increase in capacity at

Musselburgh Grammar on its existing site, this is subject to an assessment of the impact any such expansion of this already large school might have on delivering educational outcomes. If the Grammar were not to be expanded beyond the capacity needed to accommodate existing housing commitments then, in the absence of any alternative means of further increasing secondary education capacity, this would be a significant constraint on any further new housing allocations in this cluster.

- 2.37** The ability to provide additional primary school capacity in Musselburgh is also very restricted. Some very limited capacity is available in existing primary schools to the west of the town, but elsewhere in the settlement the capacity of existing facilities is projected to be reached as a result of natural change in the baseline pupil roll projections and / or existing housing commitments. Additionally, the existing primary schools are landlocked and their sites are unable to expand further. An expansion of the committed new Wallyford Primary School once it is in place would be possible. There would also be scope for a potential capacity increase at Whitecraig Primary School. If any significant amount of new housing were to be supported elsewhere in the cluster then this would likely require more new primary school(s) to be provided as part of those proposals.

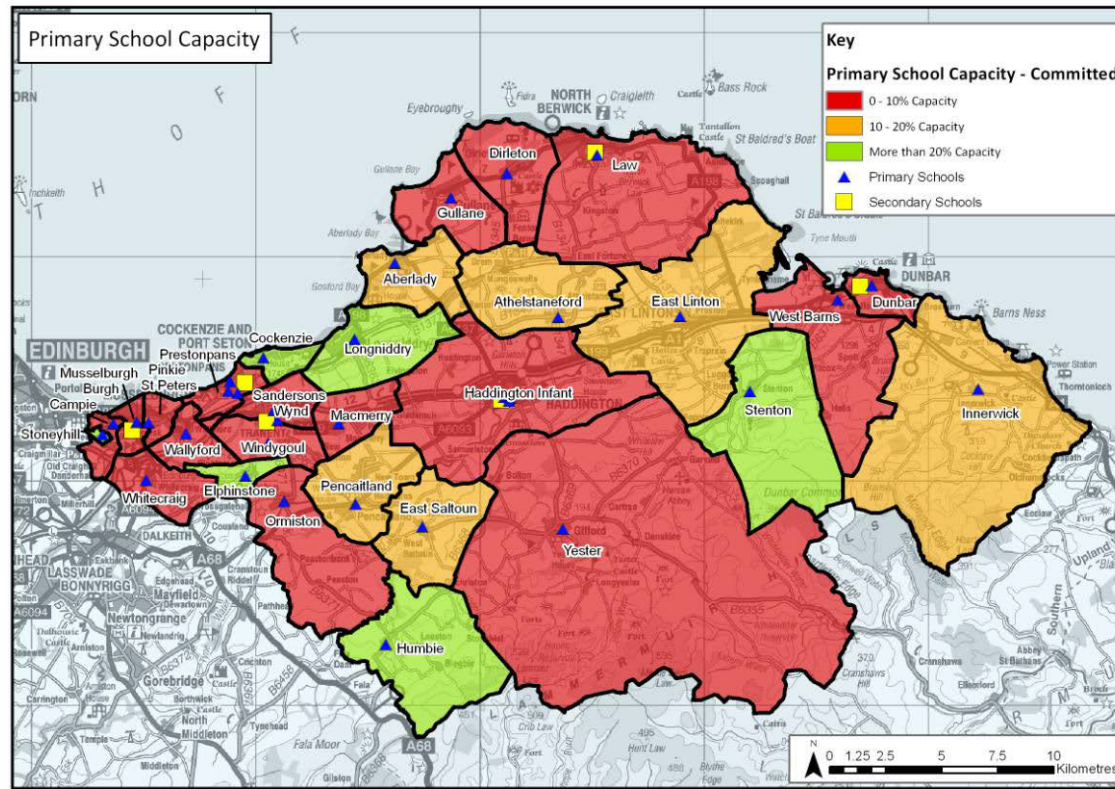
Preston Lodge Cluster

- 2.38** Prestonpans' Preston Lodge High School has committed capacity which is sufficient to accommodate existing housing commitments in its catchment area. There may be potential for a further increase in capacity at Preston Lodge High School. Should any such additional capacity be provided, its provision and use would be dependent on a number of considerations: the education solution for the current allocation for Blindwells new settlement and any expansion of it, or if Preston Lodge were to be used to accommodate pupils from new development in Musselburgh, or if an expansion of an existing settlement in the Preston Lodge cluster were to be supported.
- 2.39** Prestonpans Infant and Primary Schools are projected to reach capacity with current housing commitments and there is no scope for the further expansion of these facilities. Cockenzie Primary School has some available capacity as well as the potential for further modest expansion, and this school may also be seen as part of a short term education solution for Blindwells. Longniddry and St Gabriel's Primary Schools have a limited amount of available capacity and no potential for further expansion beyond their current size on their current sites.

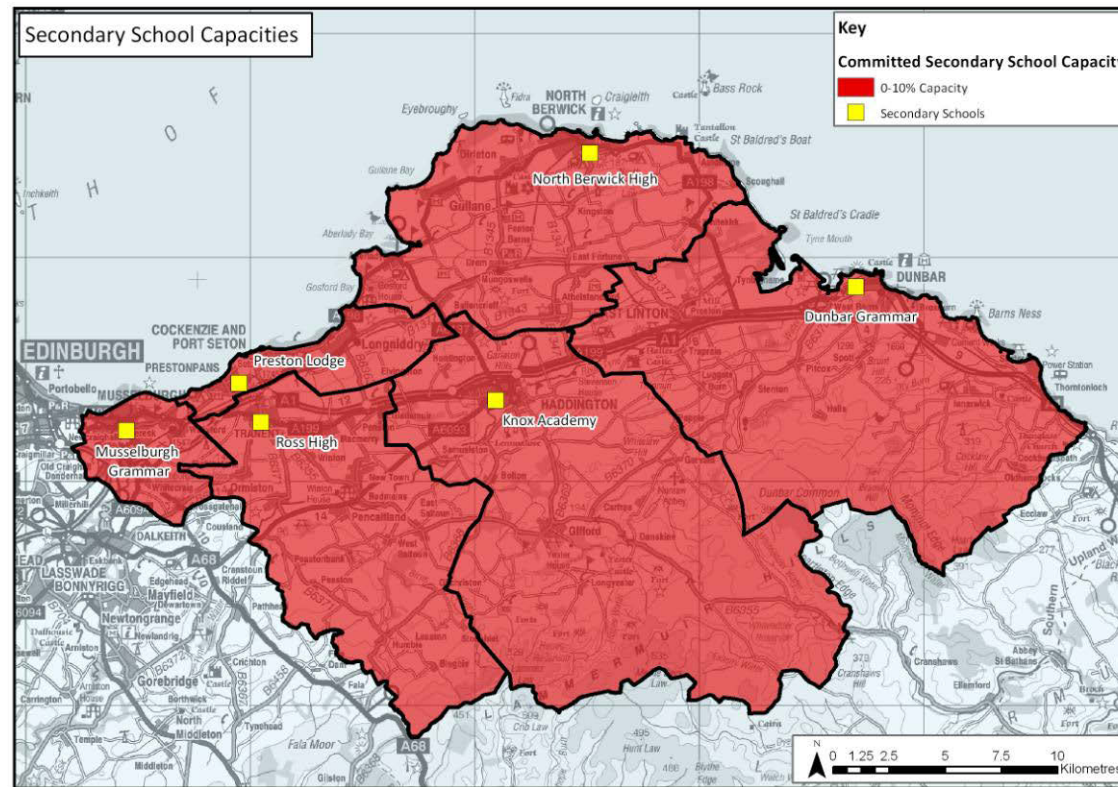
Ross High Cluster

- 2.40** Tranent's Ross High has additional accommodation committed to provide further capacity to accommodate current housing commitments. There may be potential for a further expansion of this school's capacity, but the scope for this is constrained. This is principally due to the size of the existing campus and in part prevailing ground conditions. Windygoul Primary in Tranent has significant capacity issues that may require additional

adjacent land to resolve. Sanderson's Wynd, Tranent, and Macmerry primary schools have the most potential for provision of additional capacity. Elsewhere, available primary school capacity and expansion potential is limited.



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Haddington Cluster

2.41 Knox Academy has additional capacity programmed to expand to accommodate existing housing commitments and there may be some potential for further expansion beyond this. However, the situation at primary school level is very pressured. Haddington Infant and Kings Meadow primary schools have very limited capacity beyond current commitments and no scope for further expansion. St Mary's RC has no spare capacity and no

potential for expansion. The catchment of the proposed Letham Mains Primary School relates only to the site of that development, but does have some expansion potential. Yester Primary also has some potential to be expanded.

Dunbar Cluster

2.42 Dunbar Grammar has a capacity increase programmed to provide pupil places to meet existing housing commitments. Beyond this, further capacity increase may be possible. Additional accommodation is also programmed for Dunbar Primary School to accommodate additional pupils. While a further capacity increase beyond this may be possible at the facility, the pupil roll is already very large. Elsewhere, limited capacity is available at East Linton, Innerwick and Stenton. Some additional capacity provision may be possible at East Linton and Innerwick while West Barns primary school may be modestly expanded beyond that needed to accommodate current commitments.

North Berwick Cluster

2.43 North Berwick High School is to be expanded to accommodate existing commitments. Land on its western side is safeguarded for education purposes in the current local plan: it would provide scope to provide additional capacity. Law Primary School is also to be expanded for existing commitments following realignment of Haddington Road, but may not be able to expand further. Other than Dirleton and Athelstaneford primaries, which have very limited capacity available and can't be expanded, Gullane and Aberlady primary schools have very limited capacity and may have potential for further modest expansion on site.

Emerging Issues

2.44 East Lothian has a relationship with the city and other parts of the city region and its settlements and centres, but it also offers something different. It has wide variety of high quality built and natural environmental capital and, with countryside and coast in the area, an abundance of leisure tourism opportunities. All this is within easy access of the city and places the area in high demand as a place to live, work, recreate and visit. However, the very characteristics that attract people to East Lothian are also those that are at risk of being lost if new development is not introduced sensitively.

2.45 Agricultural activity continues throughout East Lothian, reflecting the quality of agricultural land available. However, the area's economic base is also changing. Mining, fishing and manufacturing are diminishing sectors while the service sector and tourism activity are growing. Small to medium size enterprise is a strength in the area, but when compared to other parts of the city region in terms of connections and relative accessibility via national

and international modes of transport, East Lothian is currently a less preferential location for attracting large scale economic development and employment opportunities. Employment land delivery, and thus the provision of new jobs, is a significant issue. This is particularly so given the projections for increased population / need for housing and because the area is an attractive place to live. This influences the availability of land, including allocated land, for economic development because much of it is owned or controlled by those wishing to build homes rather than provide employment opportunities. This is a significant challenge to bringing about an increase in the job density in the area and realising associated benefits, including helping to address the commuting travel pattern and associated CO₂ emissions and to help reduce inequalities.

- 2.46 East Lothian has been the subject of strategic development pressure for many years, mainly because it is part of the Edinburgh Housing Market Area. This has resulted in the expansion of settlements, with those neighbouring ones in the west drawing closer together and those in the east near the limit of what can be achieved in the way of expansion without significantly changing their character and setting. Accommodating the SDPs additional development requirements, particularly its housing requirements, in East Lothian will require very careful consideration of the area's environmental and infrastructure opportunities and constraints and how infrastructure constraints may be overcome; as such a key related consideration will be the resources available to implement any development strategy.
- 2.47 Consideration should be given to the way the housing market operates across and within East Lothian (it likely has greater capacity in the west of the area than the east) and also to the delivery of new homes, including affordable homes, where there is likely greatest need and demand for them. Regeneration should be promoted and new development should be integrated with sustainable transport options. The need to travel as well as travel distances should be minimised together with associated CO₂ emissions. Opportunities to use public transport and improve active travel options should be maximised. Providing homes nearby employment opportunities is a related consideration. Other important factors will be consideration of the existing settlement pattern in the area, the form and structure of towns as well as the future extent of the green belt. The introduction of a green network to the area, which safeguards and links important areas of open space and natural habitats, and includes improved opportunities for active travel, will also be an important mitigating factor which could also help improve community health and well-being.
- 2.48 In East Lothian the availability of jobs relative to the population (job density) is lower than in other local authority areas as well as the rest of Scotland. While many people are attracted to live in East Lothian, around half of its working residents elect to travel out of the area to access the wider range of jobs (often higher value), goods and services on offer elsewhere in the city region. Whilst many of the area's residents are highly qualified, there are also areas of deprivation, and regeneration opportunities continue to exist particularly in the west of East Lothian. The west of East Lothian is currently its most accessible part in terms of connections to the wider city region, including in terms of digital connectivity. Yet there may be scope for improved local rail services including potential for a new rail halt at East Linton. High speed digital networks (240mb and above) are

also programmed for expansion across almost all of East Lothian by 2018. This means that 90% of properties will be served by this broadband speed and all remaining properties (likely to be in the countryside) are programmed to have at least 2mb provision in the same period.

- 2.49 East Lothian has six main towns and many smaller settlements with their own individual and different character and few remaining meaningful urban brownfield re-development opportunities. This means there will be pressure for the release of further greenfield land to accommodate the development requirements of the SDP. The main towns act as service hubs for the smaller satellite settlements around them and each has its own role in the hierarchy of settlements / centres. The historic nature of the settlements means they are well consolidated. This influences the type and scale of new development, including commercial and retail development, that can be accommodated within them and their town centres. Overall, people from East Lothian settlements travel to shop elsewhere to other settlements and centres in the city region. An emerging issue is how any additional retail provision might be accommodated in the area in view of its growing population.
- 2.50 These factors combine to restrict access to housing, jobs and other opportunities for some residents (placing them at a disadvantage) as well as generate commuting travel patterns and associated CO₂ emissions. They are also manifested in the need for affordable housing, in the transport network capacity issues, in the demand for and limited capacity in public transport and other services as well as in car based commuting. The trend towards travelling longer distances (and possibly online retailing) has also influenced shopping habits, impacting on the role, vitality and viability of East Lothian's town centres and the range of amenities available locally.
- 2.51 Demands are also being placed on the areas facilities and infrastructure to ensure adequate local service provision and infrastructure capacity. While some available water and drainage capacity exists in the west of the area, additional infrastructure capacity in general in many areas will need to be provided to accommodate new development. In view of the scale of growth the area has accommodated, the lack of available education capacity is now a very significant issue to be resolved in order to accommodate further new development. New education capacity / facilities at primary and secondary level will be required to accommodate the SDP's housing requirements.
- 2.52 Overall, significant investment will be required to overcome the infrastructure constraints in the area, at a time when the availability of funds restricts the delivery of the increased infrastructure capacity that is necessary to deliver growth. Yet there is continuing need to make appropriate development land available in East Lothian and finding this will present challenges, but it will also offer opportunities.

3 The National, Regional & Local Policy Context

- 3.1 The strategy and policies of the LDP must reflect the National Planning Framework (NPF), Scottish Planning Policy (SPP) and Advice (PAN's) as well as conform to the SDP. The LDP will also have a role to play in supporting a number of other national, regional and local plans and strategies. At the same time, it should reflect the views and aspirations of the Council and those who live, recreate and do business in East Lothian. A series of early community engagement workshops were held to inform the preparation of this MIR and written comments were also invited. This MIR has an important role in communicating and seeking views on ideas for the future development of East Lothian and explaining the wider policy context.

National Planning Framework & Scottish Planning Policy

- 3.2 The LDP must take into account the Scottish Government's third National Planning Framework (NPF3) as well as Scottish Planning Policy (June 2014). NPF3 sets out the long term development strategy for Scotland and identifies national developments that should be accommodated by development plans. NPF3 is the Scottish Governments spatial plan for how to make a more successful country with opportunities for all to flourish by increasing sustainable economic growth. SPP sets out national planning policies for how the planning process can contribute to realising this.
- 3.3 NPF3 expects south east Scotland, which includes East Lothian, to continue as the driver of the Scottish economy. It notes that there is a need to deliver land for new homes and to invest in infrastructure, including where cross local authority boundary impacts are expected such as trunk road capacity, including the A720 city by-pass. Opportunities for regeneration are to be maximised. The importance of towns in the city region is also recognised. NPF3 acknowledges that infrastructure capacity in general is a significant issue: in some cases new facilities will be needed, but best use should first be made of existing capacity and facilities where appropriate; innovation and joint working will be needed to secure funding mechanisms for more capacity. Into the longer term the spatial strategy for the Edinburgh city region will need to acknowledge regional infrastructure constraints.
- 3.4 Key economic sectors to be supported the city region include financial services, life sciences and universities, food and drink, tourism and energy related development. Cockenzie Power Station and the Forth coast to Torness is potentially an important energy hub and NPF3 recognises the need for infrastructure that allows electricity from off shore wind projects to be connected to the grid. In relation to Cockenzie, the LDP is to (i) continue to support its status as a location for non-nuclear baseload electricity generating capacity and associated infrastructure, potentially including facilities for Carbon Capture and Storage (ii) recognise its potential for renewable energy related development as well as (iii) its potential for port-related

development. If competing proposals emerge, those with greatest economic benefits and which make best use of the location's assets are to be prioritised. NPF3 does not support development of new nuclear power stations, but an extension to the operational life of Torness is not ruled out.

- 3.5 The Central Scotland Green Network is a national development which also extends into East Lothian that is to help maintain the environmental quality of the area and to promote active travel opportunities and healthier lifestyles.

The Strategic Development Plan (SESplan)

- 3.6 SESplan's SDP was approved by Scottish Ministers in June 2013. By law, the LDP must conform to the Strategic Development Plan (SDP). The SDP covers the planning period up to 2024, and also signposts potential future housing requirements and a spatial strategy for the city region up to 2032. In summary, the SDP sets out a spatial strategy which broadly continues that of the former Edinburgh and Lothians, Fife and Scottish Borders structure plans. It identifies a number of Strategic Development Areas (SDAs) which local development plans must prioritise as locations to accommodate the SDPs strategic housing and employment growth. East Lothian has one SDA and it runs along the key transport corridor of the A1 and East Coast railway line from Musselburgh to Dunbar.
- 3.7 The SDP sets an overall housing land requirement for the SESplan area of 107,545 homes up to 2024. To meet this total, land capable of delivering 74,835 homes is to be available in the short term up to 2019, with land for a further 32,710 homes to be available in the medium term up to 2024. The distribution of this housing land across the city region has been confirmed by Ministerial approval of SESplan's Supplementary Guidance on Housing Land (see para 5.35 below). Of this regional total, SESplan's Supplementary Guidance on Housing Land identifies that, for East Lothian, land capable of delivering 10,050 homes will be needed up to 2024, with an interim requirement of land capable of delivering 6,250 homes up to 2019. A five year effective housing land supply is also to be maintained at all times.
- 3.8 A further requirement of the SDP is to maintain 76 hectares of employment land in East Lothian. It also identifies four key employment locations within the area where employment land is to be provided. These locations are at Craighall, Macmerry, Blindwells and at Spott Road Dunbar. The SDP also establishes a policy framework on matters such as employment, housing, town centres and retailing, minerals, energy and waste, transportation and infrastructure, water and flooding, and on green belts and green networks.

- 3.9 LDPs must conform to the SDP development strategy, development requirements and policy framework. Importantly, the SDP is clear that in the selection of new development sites to meet its requirements, existing allocated sites must be carried forward and these existing allocations must be complemented by and must not be undermined by new land allocations.

The Council Plan, Single Outcome Agreement and other relevant Plans Policies and Strategies

- 3.10 The Council's overall aim, expanded upon in the Council Plan 2012 - 2017, is to create a prosperous, safe and sustainable East Lothian that will allow its people and communities to flourish⁷. The Council Plan also has four objectives, namely to 1) grow our economy; 2) grow our communities; 3) grow our people; and 4) grow the capacity of our Council. The outcomes that the Council would wish to achieve stem from the Council Plan aims and objectives and are reflected in the Single Outcome Agreement⁸ 2013 – 2023, prepared by the East Lothian Partnership.
- 3.11 The partnerships statement of intent is that “We will work in partnership to build an East Lothian where everyone has the opportunity to lead a fulfilling life and which contributes to a fair and sustainable future”. The partnerships overarching priority is to reduce inequalities both within and between East Lothian's communities. To work towards this strategic objective the partnership has set 10 outcomes which it would wish to achieve. The ability of the LDP to contribute to the outcomes is highlighted in the following section on the proposed Vision, Aims, and Objectives for the LDP.
- 3.12 The Council's Economic Development Strategy⁹ 2012 – 2022 identifies the strengths which East Lothian has and can exploit to maximise its sustainable economic competitiveness. It recognises many of the opportunities and challenges facing the area as highlighted in the previous section. The Council's Local Housing Strategy 2012 - 2017 is approved, but it will need to be refreshed in light of SESplan's Supplementary Guidance on Housing Land. This will be progressed in parallel with the LDP. The regional transport strategy (currently under review) has been reflected in the SDP. East Lothian's Local Transport Strategy 2000 is under review and this will be progressed in parallel with the LDP. In addition to the SDP, there are also a range of other plans, policies and strategies to which the LDP must have due regard. These include the Council's Draft Open Space and Sports Pitch Strategy, its Biodiversity Action Plan and its Core Path Plan.
- 3.13 In the preparation of the MIR adjoining planning authorities have been consulted and account has been taken of their emerging LDPs. Cross boundary matters have also been explored as part of this and related opportunities and constraints are discussed more fully in the following sections.

⁷ Council Plan 2012-2017, East Lothian Council

⁸ Single Outcome Agreement 2013 - 2023, East Lothian Council

⁹ Economic Strategy 2012 – 2022, East Lothian Council

Additionally, a consultation draft of the national marine plan was published in July 2013, with the final plan expected at the end 2014. Regional Marine Plans will follow the national one. The finalisation of these plans will determine if there is a need to consider the relationship between marine and terrestrial plans in the LDP.

- 3.14** For planning purposes the Zero Waste Plan constitutes the National Waste Management Plan along with NPF3, SPP, PANs and SEPA waste data sources, including Waste Data Digests and Waste Infrastructure Maps and Thermal Treatment of Waste Guidelines 2009. River Basin Management Plans for Scotland are in place and associated flood risk management plans are due to be published by 2016. Related considerations of these other plans, policies and strategies will be reflected in the LDP as relevant.
- 3.15** Any issues arising out of the European Directive on the control of major accident hazards involving dangerous substances are also to be taken in to account by the LDP, including through controls on the siting of new establishments, modifications to existing establishments and new developments (transport links, residential areas, etc.) in the vicinity of existing establishments. There is a need to ensure that appropriate distances are maintained or created between establishments and residential areas. There are a number of gas pipelines throughout East Lothian as well as Torness Nuclear Power Station and existing policies address related issues.
- 3.16** There will be a need to reflect these other plans, policies and strategies in the LDP as relevant and required. The range of plans, policies and strategies that have been taken in to account as relevant to the Strategic Environmental Assessment (SEA) process are highlighted in the Interim Environmental Report which has been published alongside this MIR.

The Role of the Main Issues Report

- 3.17** The main purpose of the MIR is to describe the implications of the SDP for East Lothian, and to discuss how its development requirements could be accommodated in the area taking in to account other plans and strategies as relevant. The MIR highlights the preferred approach at this stage for delivering the development requirements of the SDP for East Lothian and, where relevant, any reasonable alternatives to the preferred approach, if they exist. The detailed requirements of the SDP for East Lothian are discussed under each of the main issues, which are set out below the following section. The main issues are separated out into discussion on spatial strategy issues, including provision of housing and employment land, and for protecting and enhancing the environment. This is carried forward into a discussion on how the preferred strategy approach might be implemented in each cluster area in East Lothian. This is followed by a review of main policy issues. As a precursor to this, the following section discusses the proposed Vision, Aims & Objectives for the LDP.

4 Vision, Aims, Objectives & Outcomes

Vision

- 4.1 Being a part of the Edinburgh City Region the planning vision for East Lothian has already been set by SESplan's SDP, namely that:

“By 2032, the Edinburgh City Region is a healthier, more prosperous and sustainable place which continues to be internationally recognised as an outstanding area in which to live, work and do business.”

- 4.2 This vision statement is broadly relevant to the LDP and the intention is to carry it through to the LDP.

Aims, Objectives and Outcomes

- 4.3 The following are proposed to be the main aims of the LDP, taking into account those Council Plan objectives that are directly relevant to land use planning. In addition, the references in brackets indicate which of the ELCPP Single Outcome Agreement outcomes the aim or objective supports:

Aims and Strategy Drivers [SOA: 1, 2, 3, 4, 5, 6, 7, 8, 9 and 10]

1. To recognise that East Lothian is part of the wider city region and has a significant role to play in accommodating and providing for the city region's as well as its own economic, population and household growth in a sustainable way
2. To identify locations where development of different types associated with these aims should take place, where relevant within the appropriate timescales, as well as where development should not occur
3. To provide an appropriate framework of policies and proposals that can promote and manage development in the area towards these aims

Objectives and Outcomes

Promote sustainable development [SOA: 1, 2, 3, 4, 5, 6, 7, 8, 9 and 10]

- To ensure that new development, and the locations where and way in which it is delivered, contributes to climate change and regeneration objectives, including the need to reduce travel, green house gas emissions as well as energy consumption and waste, and to provide for appropriate renewable energy generation opportunities
- To make efficient use of land, buildings and infrastructure, prioritising the development of previously developed land over greenfield land where possible, while recognising that the nature of East Lothian and scale of strategic development requirements will likely require significant amounts of greenfield land to be used
- To integrate land use and transport by finding locations for new development that reduce the need to travel and that are well-served by a range of transport modes, particularly public transport and active travel opportunities, and to help reduce CO₂ emissions

Help grow the economy, increase housing supply and reduce inequalities [SOA: 1, 2, 3, 4, 5, 6, 7, 8, 9 and 10]

- To provide opportunities for economic growth and job creation and to meet housing requirements in appropriate marketable locations
- In so doing, to promote regeneration and the creation of mixed communities which provide opportunities for employment and housing, including affordable homes, and areas for leisure and recreation and other services and amenities locally, focusing on town centres first
- To recognise the important role that town centres and other mixed use areas have in providing services locally and to protect them from inappropriate development while identifying where and how appropriate new beneficial development opportunities may be realised
- To encourage the diversification of the rural economy by supporting appropriate economic development and tourism, while recognising the pressures the area is under for housing development, and to maximise the use of appropriate traditional buildings

Protect and enhance the area's high quality environment and its special identity [SOA: 1, 2, 3, 4, 5, 6, 7, 8, 9 and 10]

- To ensure that new development is located in such a way that it respects the character, appearance and amenity of the area, including its settlements and their settings
- To ensure that the area's significant international, national and local cultural and natural heritage assets are protected and conserved, and where appropriate enhanced, including biodiversity, flora and fauna as well as soil, water and air quality
- To direct development to locations and to design new development so it will be resilient to the effects of climate change and helps manage flood risk
- To ensure that the design of new development reflects the sense of place and identity of the local area, and is properly integrated with its surroundings in terms of movement as well as form and appearance, while contributing to wider sustainability and place making objectives

Ensure adequate infrastructure capacity and an appropriate use of resources [SOA: 1, 2, 3, 4, 5, 6, 7, 8, 9 and 10]

- To ensure that all new development is capable of being served by available infrastructure capacity, or that this will be provided to allow the development to take place, while maintaining appropriate levels of service
- To make use of existing and promote the expansion of digital networks throughout the area
- To minimise energy consumption, safeguard mineral deposits where appropriate and reduce waste arisings

4.4 The SDP's specific implications for the LDP are discussed in detail under each of the main issues set out in the following section.

Question 1: Aims, Objectives and Outcomes

Do you have any comments on the aims and objectives for the LDP?

5 Spatial Strategy Issues & Options

Main Strategy Issues & Options for the LDP

Sustainability & Climate Change

- 5.1 The Town and Country Planning (Scotland) Act 1997 (as amended), Section 3E, requires planning authorities to carry out their development planning functions with the objective of contributing to sustainable development, having regard to Scottish Planning Policy (SPP). SPP sets out how planning decisions can contribute to sustainable development, including by the integration of land use and transport. This includes helping to reduce greenhouse gas emissions in line with the commitment to reduce these by 42% by 2020 and 80% by 2050¹⁰ - i.e. against the 1990 baseline.
- 5.2 A presumption in favour of development that contributes to sustainable development has also been introduced to SPP¹¹. Development Plans are to take this in to account alongside the environmental and infrastructure opportunities and constraints in their area. They are to direct development to appropriate locations, integrate land use and transport and help bring about regeneration. The development strategy should also be deliverable in view of the resources available to implement the plan¹².
- 5.3 Sustainability is a theme that is already embedded in the SDP's spatial strategy and policy approach and is not a separate policy area. It is a specific aim of the SDP to ensure that new development is directed to sustainable locations. The SDP also requires LDP policies and proposals to respond to climate change by promoting mitigation, adaptation, appropriate design, regeneration and by encouraging the use of sustainable building materials¹³.
- 5.4 The LDP should promote appropriate development in less environmentally sensitive areas; prioritise the use of brownfield land over greenfield land; promote the efficient use of land, buildings and infrastructure; help secure regeneration and the creation of mixed communities; protect and conserve, and where appropriate enhance, the cultural and natural heritage, including the landscape and open space; improve habitat connectivity and access to services and facilities locally; reduce the need to travel and promote more sustainable and active modes of transport (thereby helping

¹⁰ Climate Change (Scotland) Act 2009 and SPP paragraph 18

¹¹ Scottish Planning Policy paragraph 27

¹² Scottish Government Circular 6/2013 Development Planning paragraph 57

¹³ SESplan SDP Policy 1B

reduce transport based CO₂ emissions); help manage the use of resources including air, water, soil and in waste management; consider the lifecycle of development and encourage the use of sustainable and recycled materials in construction; and contribute to climate change adaptation. The LDP should also promote flood risk schemes, avoid development in areas of flood risk as well as those susceptible to coastal erosion, and contain policies and proposals that conform to the SDP, including with respect to design and development density. These issues should underpin The LDPs spatial strategy, site selection and policy approach.

Table 4: Sustainability & Climate Change

Preferred Approach	Promote sustainability and climate change mitigation and adaptation: embed the principles of sustainable development in the LDPs spatial strategy, policies and proposals to ensure it promotes and manages development in the interests of sustainable development, including reducing greenhouse gas emissions.
Reasonable Alternative	None

Question 2: Sustainability & Climate Change

In terms of the approach to sustainability and climate change mitigation and adaptation, section 3E of The Town and Country Planning (Scotland) Act 1997 (as amended) as well as SPP and the SDP require the LDP to follow the preferred approach.

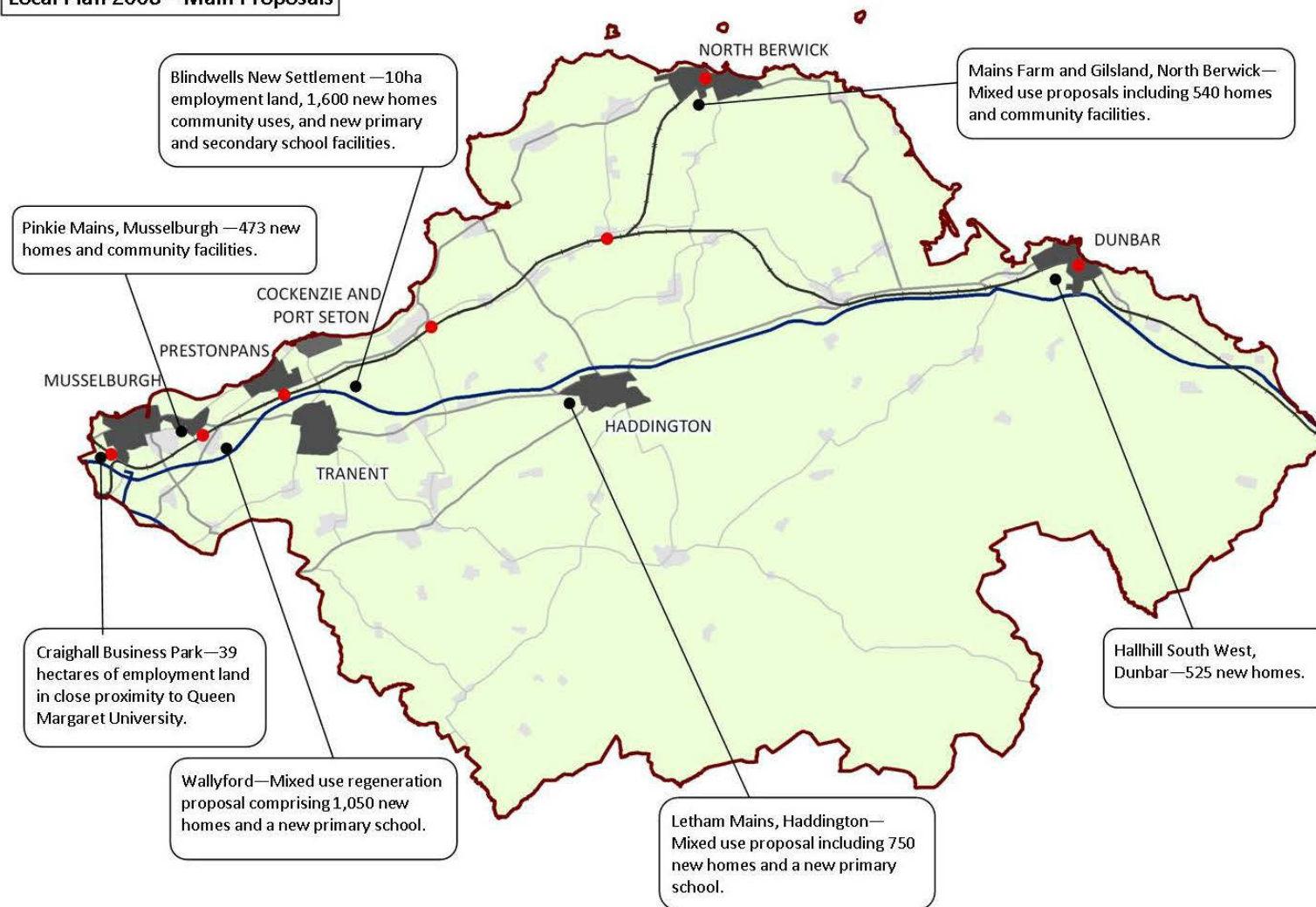
Are there any other matters related to sustainability and climate change mitigation and adaptation that you think the LDP should seek to address?

Development Locations

- 5.5 The SDP requires existing land allocations set out in the current local plan to be retained: new development brought forward by the LDP must complement and not undermine these. SPP is also clear that where a plan is under review this should not be undermined by premature proposals¹⁴. The existing local plan strategy was guided by the previous structure plan which acknowledged that East Lothian is part of the wider Edinburgh housing market area. It required land to be allocated for new housing to provide for the population and household growth anticipated in the area at that time. This was also to accommodate a proportion of such growth anticipated to be generated by and migrate from Edinburgh to East Lothian.
- 5.6 This housing land was accompanied by land allocations for economic development. The co-location of housing and employment land in East Lothian was to help promote and grow the area's economy and to help reduce the need to travel. Yet job density is still lower in East Lothian than the surrounding local authorities. There is a trend of significant car based out commuting from East Lothian because of this, as residents travel out of the area to access the jobs available more widely elsewhere in the city region. In view of these factors, and to help manage the introduction of new development appropriately, the locations selected for development under the current strategy are accessible, including by public transport.
- 5.7 The current local plan strategy identifies 6 main growth locations where new housing and employment land has been provided close to one another, including at a new settlement at Blindwells. The main proposals are illustrated on the plan on the following page. Sites for housing and economic development are spread among East Lothian settlements, and nearby transport corridors and public transport services. The expansion of existing settlements is promoted where infrastructure solutions have been found and where landscape capacity allows. In the west of the area sites are allocated to help promote regeneration. The new settlement at Blindwells former open cast mine is promoted by the current local plan. It is a medium to long term development opportunity with significant growth potential. There is a potential opportunity to increase the scale of the current allocation of 1,600 homes and 10ha of employment land at Blindwells by expanding into land further east. It is the current local plan strategy intention that this should be realised in preference to the further significant expansion of existing settlements, some of which are nearing the limit of expansion beyond which significant changes to their landscape setting, character and infrastructure would be required.
- 5.8 The current strategy is in place so the benefits of a successful and growing city region can be spread and shared among East Lothian's communities, to make good use of previously developed land with degraded landscape character, and to encourage regeneration where appropriate. The intention is to promote growth where environmental capacity exists, while creating accessible mixed communities that provide opportunities for economic development and to reduce out-commuting.

¹⁴ Scottish Planning Policy paragraph 34

Local Plan 2008—Main Proposals



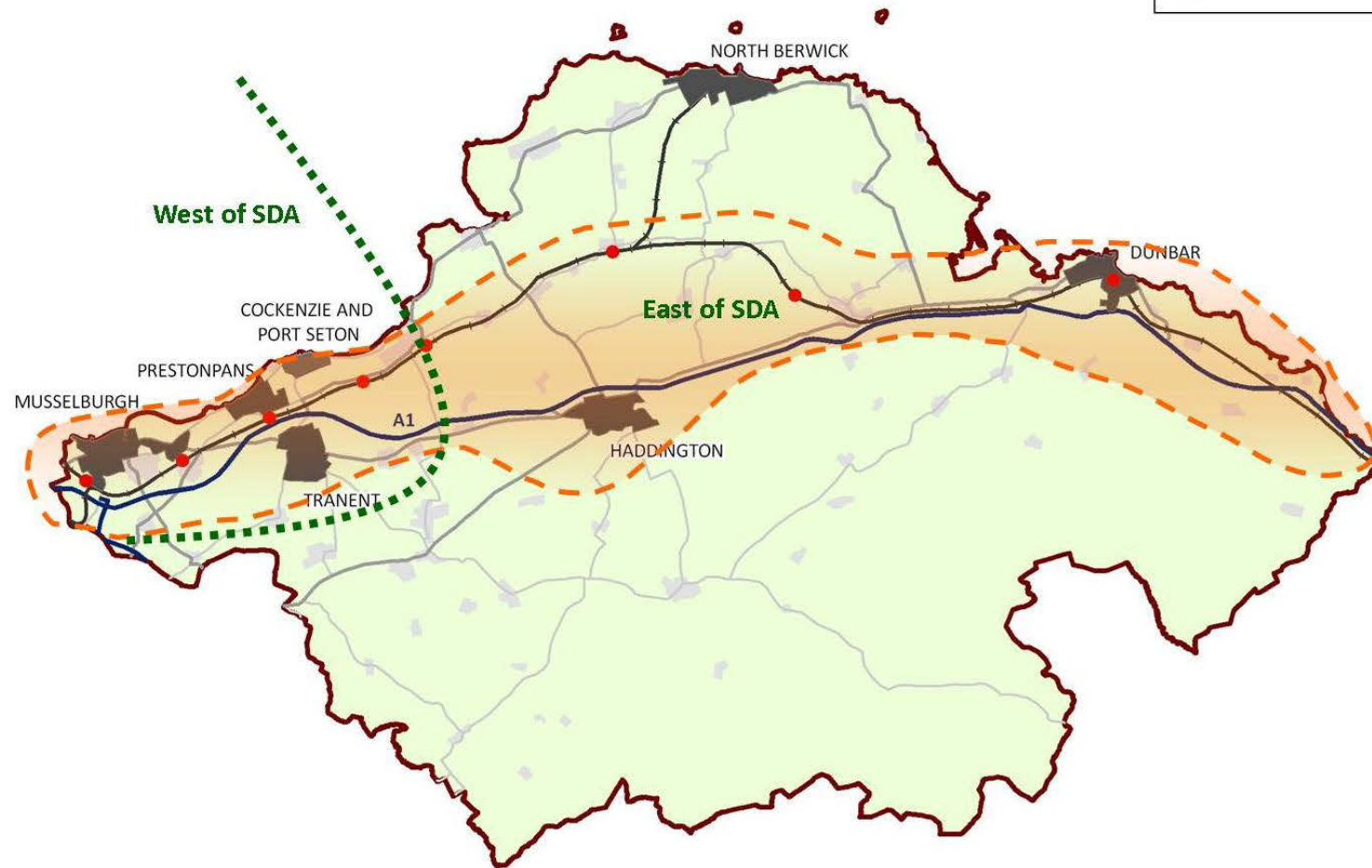
- 5.9 This sharing of growth throughout East Lothian has led to a strategy of ‘dispersed’ strategic and smaller scale sites allocated for housing and economic development. The focus of growth on the existing main settlements promotes them as service centres for the growing population in and around them. Under the current strategy Blindwells is to remain subservient to the existing main settlements, but this may change in future. **However, this ‘dispersed’ strategy has resulted in some existing land allocations being more distant than others from where significant mobile demand for housing originates, and from the existing main centres of employment and other identified locations with greatest potential for significant job creation and economic development in the wider city region.** The economic climate in general may continue to make some sites in East Lothian challenging to deliver in the short term, but the prospect of their delivery is expected to improve during the plan period and beyond.
- 5.10 With good economic conditions all of East Lothian has proven marketable as a location for housing development, but less so as a location for economic development and significant job creation when compared to other better connected areas to the west of the city region: this may increase with distance from the city. The intentions of the current strategy remain valid, and the SDP requires the existing land allocations of the current local plan to be carried forward in to the new LDP. **However, a main strategy issue for the LDP is if, when seeking additional development land to meet the SDP’s requirements, the LDP should continue to follow a strategy that seeks to ‘disperse’ housing and economic development across the area, or if an alternative more ‘compact’ spatial strategy should and can be followed, at least in the short to medium term.**
- 5.11 The SDP requires new development to be directed to the most sustainable locations. Within this the scope for the LDP to consider strategy alternatives is limited by the SDP. SDP Policy 1A sets out thirteen Strategic Development Areas (SDAs) to which strategic development requirements should be directed. SDA (5) is within East Lothian and it follows the key transport corridors of the A1 and East Coast railway line. The LDP must prioritise this SDA as the area within which to find new housing and employment sites to meet the strategic development requirements of the SDP¹⁵. SDA (5) is illustrated at Figure 1 of the approved SDP¹⁶ and on the plan on the next page. It includes the following land and main settlements:

West of SDA	East of SDA
Musselburgh, Inveresk, Wallyford and Whitecraig	Haddington
Tranent, Prestonpans, Cockenzie and Port Seton	Dunbar, Belhaven and West Barns
Land at Blindwells	Land at Drem
Longniddry	East Linton

¹⁵ SESplan SDP Figure 2, Figure 4 and Policy 1A

¹⁶ SESplan, Spatial Strategy Assessment Technical Note: Appendix 1

East Lothian Strategic Development Area



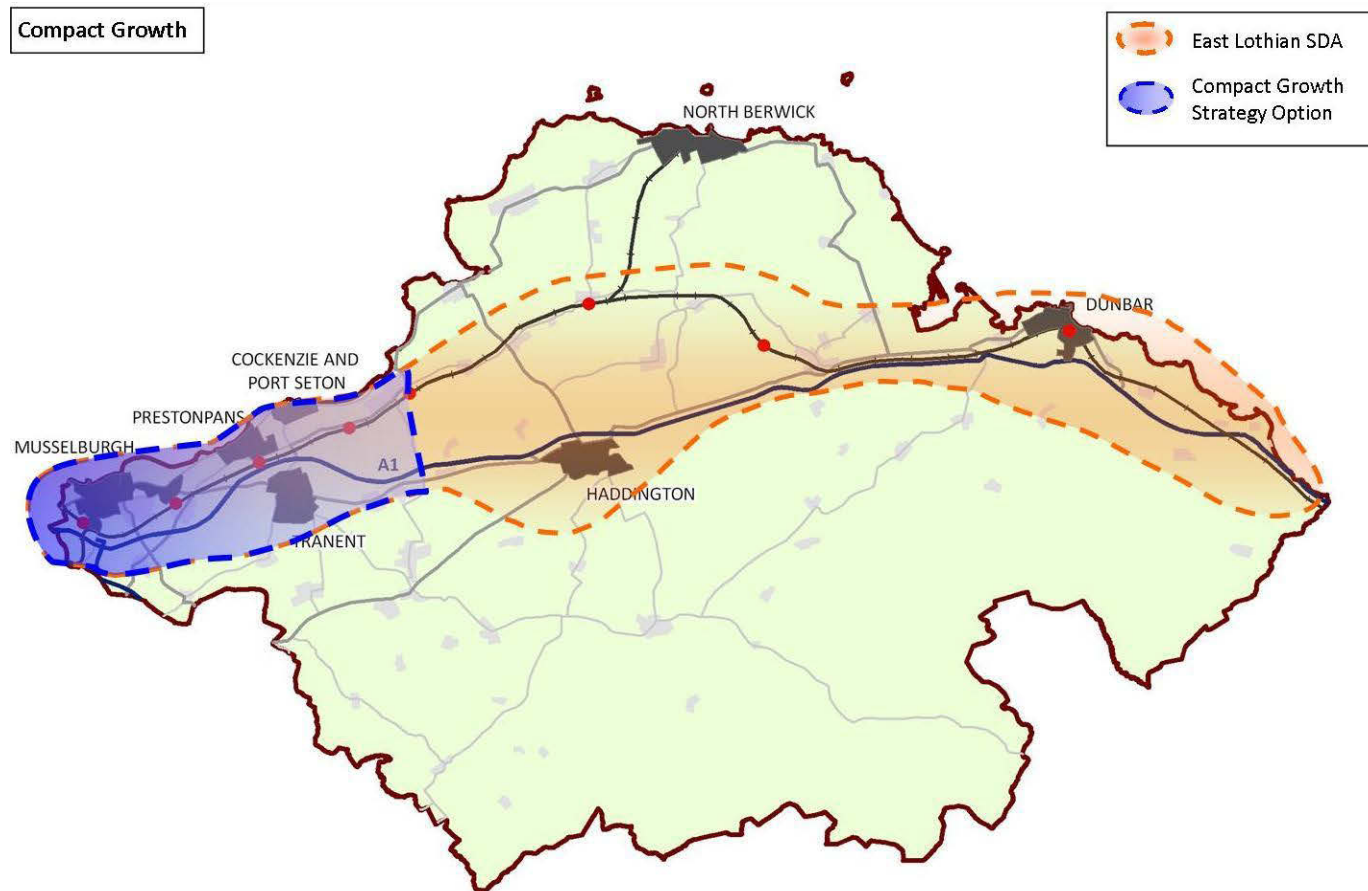
- 5.12 The East Lothian SDA excludes the area and settlements to the south of it (including the settlements of Ormiston, Pencaitland, Gifford and Stenton) as well as the area and settlements to the north of it (including North Berwick, Fenton Barns, Whitekirk, Tynninghame and all coastal settlements between Longniddry and West Barns)¹⁷. However, the approved SDP (Policy 7) also allows the LDP to identify greenfield sites for housing development outwith the SDA. Proposals promoted under SDP Policy 7 must be in keeping with the character of the settlement and local area, must not undermine green belt objectives, and any infrastructure required as a result of the development must be committed or funded by the developer. Similar considerations apply in respect of local employment sites. Nonetheless, the SDA is to be prioritised as the location for new land allocations.
- 5.13 As explained above, the SDP has set new housing land requirements to be met in East Lothian for the periods 2009 - 2019 and 2019 – 2024. The existing land allocations of the current local plan, including those discussed above, are part of the current strategy. Whilst they will contribute towards meeting the SDPs requirements recent economic conditions have delayed their development. In the preparation of the LDP the timescales within which these existing sites can contribute to meeting new housing and economic development requirements in each of the plan periods must be considered. Once the contribution from existing sites has been assessed, the next step is to consider how much more land will be needed for each of the plan periods and where and how it should be provided as part of the emerging spatial strategy for the area.
- 5.14 When doing this, the strategy must take in to account the overall character and appearance of the area, its environmental and infrastructure opportunities and constraints as well as its accessibility and regeneration opportunities. Importantly, it must also take in to account the resources available to implement the plan in the required timeframe. Another consideration is the anticipated improvement in economic conditions over time, and how this is likely to influence the ability to deliver development projects of different types and sizes in different locations across East Lothian. This includes the ability to fund and deliver the essential infrastructure such as new schools, transport infrastructure and the community facilities and water and drainage capacity that will be required to allow development to proceed.
- 5.15 The scale of development projects that are underway and that are being promoted in the area in recent times has generally reduced. However, a large scale housing project has started in Musselburgh in the west of East Lothian, close to where a significant amount of mobile demand for housing originates. The west of East Lothian is its most accessible part and closest to existing jobs and services in the wider city region and where there is most scope for regeneration. Smaller sites have come forward and are being promoted in other locations where demand exists further east.
- 5.16 Whilst economic conditions remain challenging, the outlook in to the medium and long term is more positive. The emerging spatial strategy needs to consider if and how it may adapt to any short term delivery issues so it can bring forward sufficient land in the right place using appropriate sites that

¹⁷ SESplan, Spatial Strategy Assessment Technical Note: Appendix 1

are capable of development to meet requirements in the relevant timeframes. It also needs to be guided by the willingness and ability of landowners / developers to make development happen in particular locations during the plan periods, including their ability and willingness to fund the infrastructure that will be needed to allow development to proceed. Confirmed developer interest in a site may also be an important consideration, particularly for the short term. Continuity must also be provided by retaining and potentially allocating appropriate new large scale development opportunities that are able to come forward throughout the plan period and potentially beyond.

- 5.17 The SDP identifies Blindwells as a location with significant long term growth potential. The current allocation seeks to prioritise the reuse of previously developed land with degraded landscape character over the development of greenfield land that contributes positively to the character and setting of existing settlements. Expansion further east beyond the current allocation at Blindwells may involve development of greenfield land at distance from any existing settlement. A comprehensive solution for the provision and appropriate phasing of infrastructure, services and facilities that will deliver a single new settlement at Blindwells is essential if the growth of the settlement beyond its current allocation is to be justified.
- 5.18 Blindwells presents an opportunity to create a large accessible mixed community in the middle of East Lothian. Importantly, the significant opportunity is to think creatively about its role and function relative to other settlements in the city region and within East Lothian, and how it should relate to other settlements and town centres in the area. The potential for an expansion of Blindwells, together with the scale, nature and phasing of development and additional land uses that may be promoted there, is to be considered as part of preparing the emerging LDP spatial strategy.
- 5.19 A key consideration relevant to any strategy approach will be to consider the infrastructure constraints and opportunities that exist and how they might be overcome. This will help inform the likely timescales within which development may take place, based on where and when new infrastructure solutions may be provided to make additional infrastructure capacity available. As such, it must also be demonstrated that there is a willingness and ability among landowners / developers to fund and help deliver infrastructure solutions.
- 5.20 Notwithstanding this, to meet the SDP's development requirements for East Lothian in the period up to 2019 and 2019 to 2024, there are broadly two spatial strategy options that could guide how the search for new land needed to meet the requirements set by the SDP for East Lothian could be carried out in this area. These are as follows:

1. **Preferred Option - Compact Growth:** Focus the search for new housing and economic development land on the main settlements within the west of the SDA, closest to the origin of demand adjacent to the city, and then consider those main settlements further east. Land may also be identified at settlements outwith the SDA if required.



2. **Reasonable Alternative – Dispersed Growth:** Promote a continuation of the current ‘dispersed’ spatial strategy. It would seek to share and spread additional development across East Lothian by focusing on the main settlements within the SDA. Land may also be identified at settlements outwith the SDA if required.

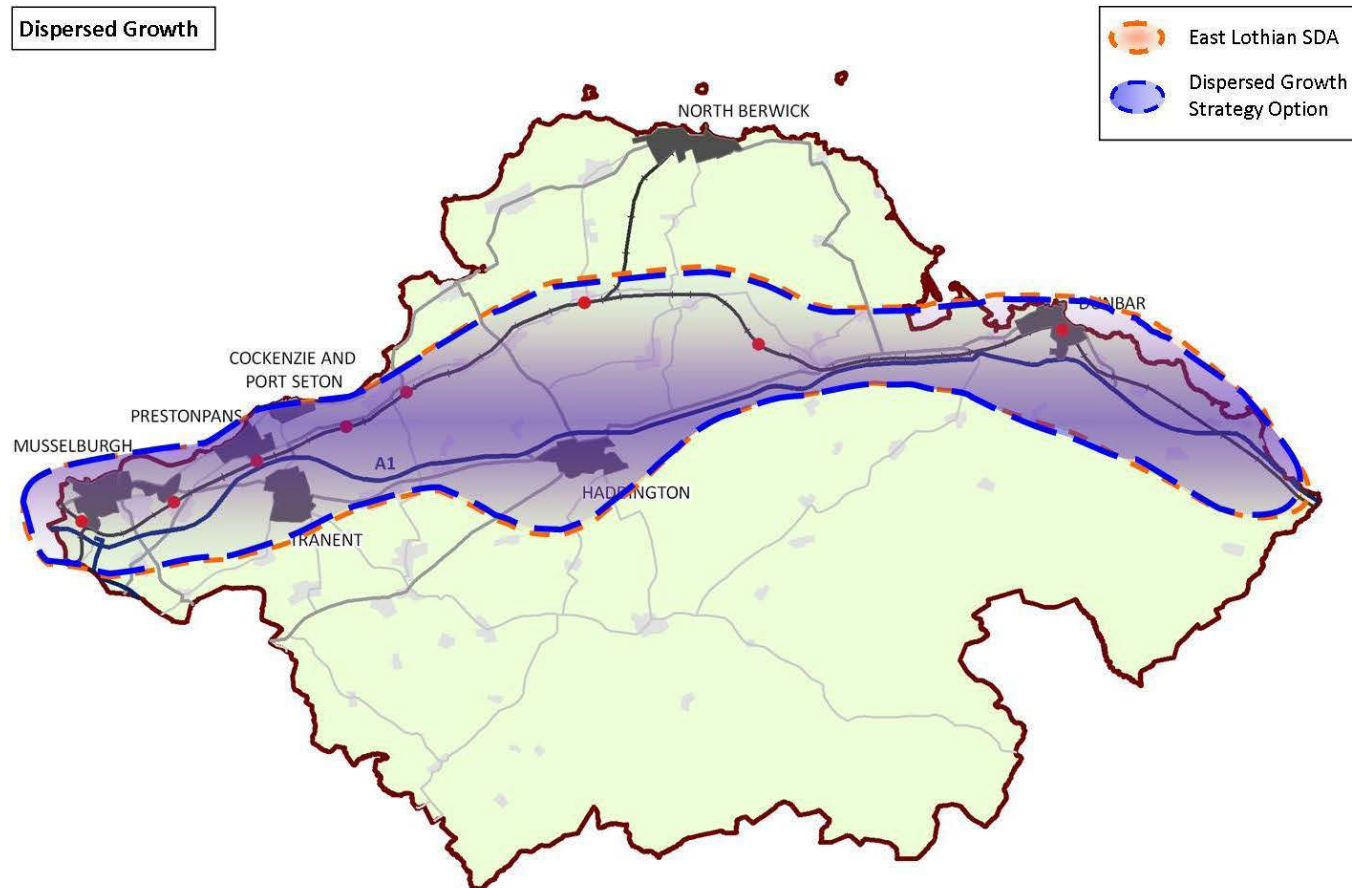


Table 5: Development Locations

<p>Preferred Approach</p>	<p>Compact Growth: Focus the search for new housing and economic development land on main settlements in the west of the SDA, closest to the origin of demand adjacent to the city, and then consider main settlements further east because:</p> <ul style="list-style-type: none"> – the Musselburgh area is the second most accessible area in the city region – the west of East Lothian is well served by frequent public transport, which becomes less frequent and more expensive further east – development in the west provides an opportunity to help reduce the need to and minimise the distance travelled as well as CO₂ emissions and encourage the use of public transport – the west is where the majority of regeneration opportunities exist – it is a core part of Edinburgh Housing Market Area and Labour Market Area so the chance of delivering new homes and jobs there may be more likely – there is significant need and demand for new housing, including mobile demand and affordable housing, in this area – the west of East Lothian is nearer major existing employment locations and regional facilities – e.g. hospitals etc – capacity is available in strategic water supply and foul drainage infrastructure here so development in the west would not be constrained by a lack of this in short term – there may be opportunities in the west for appropriate Green Belt land release – e.g. where land contributes to green belt objectives to a lesser extent, or where there may be scope for regeneration, or where land is adjacent to public transport nodes (rail halts etc) – settlement coalescence would need to be mitigated – Blindwells is a key component of this option in the medium and longer term
<p>Reasonable Alternative</p>	<p>Dispersed Growth: Seek to share and spread additional development across East Lothian by focusing on all the main settlements in the SDA. This would:</p> <ul style="list-style-type: none"> – minimise Green Belt land release, even if land does not significantly contribute to green belt objectives, is accessible or if its development would help bring about regeneration – avoid the coalescence of settlements, but the impact of development on the landscape setting of settlements beyond the green belt would feature

- result in the expansion of main settlements in the SDA that have a wide range of existing services and facilities and are accessible by a range of transport modes, including public transport, but which are not as accessible as those in the west
- move away from the west where the majority of regeneration potential exists
- move away from the core of Edinburgh Housing Market Area and Labour Market Area, and result in a potentially reduced likelihood of delivering new homes and jobs
- result in a potential for mismatch between where the housing land supply is and where there is need and demand for new housing, including affordable homes
- move new development away from the most accessible part of East Lothian in regional terms and away from that part of it best served by public transport
- move further away from major employment and regional facilities – e.g. hospitals
- increase the need to and distance travelled as well as associated CO₂ emissions
- overcoming foul drainage constraints in the east will take time
- Blindwells is a key component of this option in the medium and longer term

Question 3: Development Locations

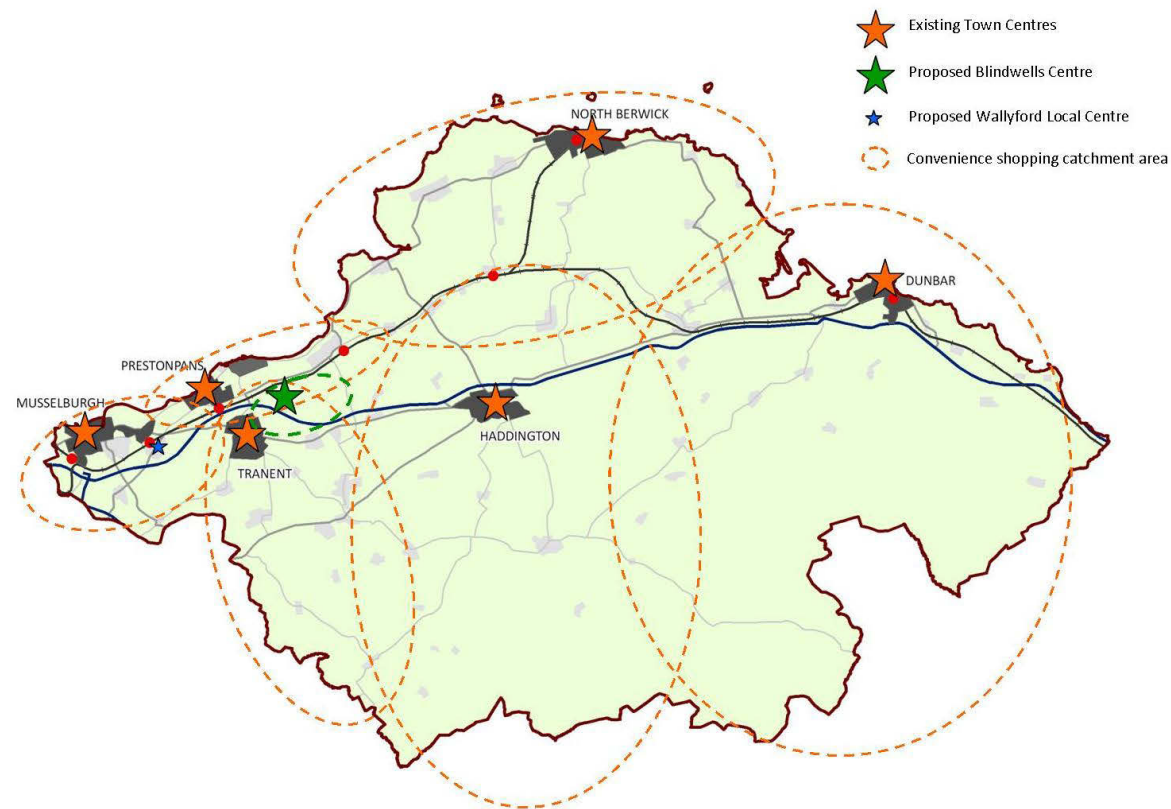
Of the two spatial strategy options, do you support the preferred (compact growth), alternative (dispersed growth), or neither?

Please explain your answer. If you support neither of the above options, what alternatives do you suggest?

Town Centres

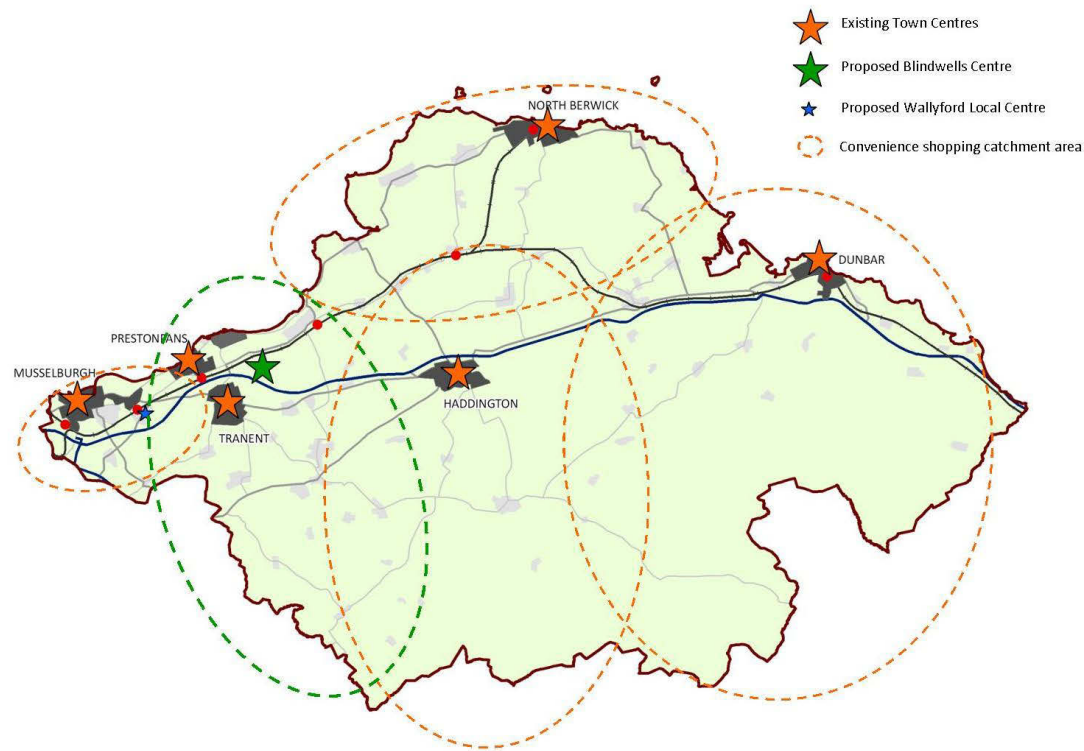
- 5.21** Scottish Planning Policy requires development plans to identify a network of town centres, commercial centres, local centres and neighbourhood centres etc as appropriate. Town centres are an important part of the settlement strategy, being a focus for a wide mix of land uses including employment, retail, local services and a range of cultural, leisure and other commercial and community facilities and housing. Town centres are service hubs for the population around them. They also contribute to a settlements sense of identity by providing a focus for civic activity as well as its self containment by providing access to employment, services and facilities locally.
- 5.22** Development plans may also establish a hierarchy of centres within the network, and seek to specify the role of certain centres relative to others in that hierarchy – e.g. identify a primary centre and / or main town centres that are supported by other local centres etc. The SDP identifies a hierarchy of strategic centres, none of which are in East Lothian. It requires the LDP to identify a network of town and any other centres in its area. Once this network is established, a sequential approach to the selection of locations for new retail and commercial leisure proposals is to be followed, consistent with SPP¹⁸ and Policy 3 of the SDP.
- 5.23** Musselburgh, Prestonpans, Tranent, Haddington, North Berwick and Dunbar make up the current network of town centres in East Lothian. There is also support for new local centres at Wallyford and at Blindwells (current allocation). A series of other neighbourhood centres exist within urban areas and are promoted within existing planned settlement expansions. Many of the smaller settlements also benefit from village centres and mixed use areas. There are no commercial centres (e.g. retail parks) in East Lothian and none are promoted by the current local plan. However, the SDP does allow the LDP to justify exceptions to the current approach, such as the introduction of a new town centre.
- 5.24** In this sense, the A1 (T) and city by-pass have improved accessibility and reduced journey times to other commercial centres outwith East Lothian. These include Fort Kinnaird and Straiton retail parks. These retail parks compete with East Lothian town centres and draw trade from them. This also generates vehicle based trips out of the area. There may be scope to improve the retail offer available to people in East Lothian and to claw back expenditure leakage from the area, in so doing helping to reduce the need to travel and transport based CO₂ emissions. This could also improve the provision of related services and facilities for East Lothian, by providing them more locally. Demonstrating this will involve the preparation of a retail capacity study and, from this, strategies for each of the existing town centres. These strategies will provide a vision for each town centre to help address local environmental issues as well as their vibrancy, vitality and viability. The strategies will be prepared once the LDP is operative, and will be carried forward as non-statutory guidance.

¹⁸ Scottish Government SPP paragraph 61-69

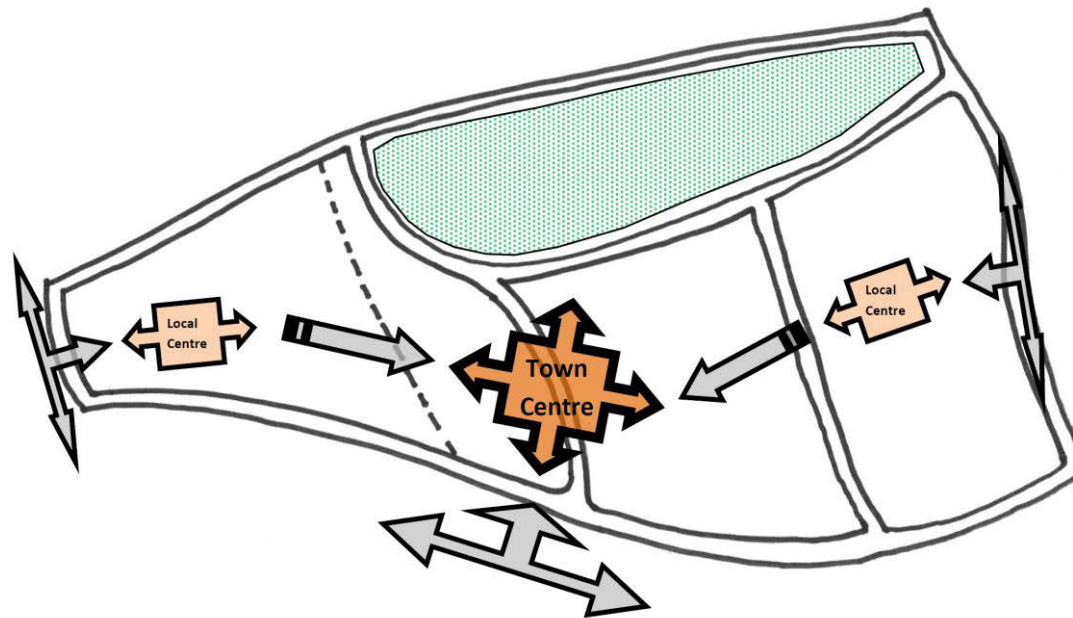


5.25 A new town centre or a town centre of a higher order – i.e. a higher order town centre is one that serves a much wider area than just the settlement in which it is located - may also be promoted by the LDP if justified. To promote such a new centre a retail capacity study would be required and an appropriate location would need to be found. The capacity study would identify an appropriate catchment area for any new town centre commensurate with its intended role relative to other town centres in the area. It would also recommend to the Council a scale of convenience and comparison retail floor space that could be accommodated without compromising strategic centres and other relevant centres within and outwith East Lothian. The role of any new town centre and the uses to be promoted there could be identified in this way.

5.26 The location selected for any new town centre must be consistent with the spatial strategy and the sequential approach set out in SPP. In terms of the spatial strategy, if Blindwells could expand it would provide the only suitable location for a new town centre. This would be the case under the preferred spatial strategy approach as well as the alternative. The same is true in relation to any higher order town centre. Blindwells is well located in East Lothian and is an accessible location nearby a significant amount of the area's population. The primary catchment area for any such new town centre may include existing town centres at Prestonpans and Tranent and also the settlements of Macmerry, Cockenzie, Port Seton and Longniddry. If a town centre of a higher order is supported then it may also include an extensive secondary catchment area covering the whole of East Lothian. However, if Blindwells can not expand, the LDP will not change the current network of centres.



5.27 In terms of the sequential approach, any new higher order town centre or town centre at Blindwells must be provided in the centre of the new settlement. There it could perform the role of a new town centre for Blindwells which, if appropriate, may also serve the surrounding area. If a new interchange with the A1 (T) is deliverable at Blindwells, this would bring clear accessibility benefits and may bring the possibility of earlier delivery.



5.28 Blindwells is to be a planned new settlement. If a new town centre is to be provided there that would serve the surrounding area this will not justify that it be provided anywhere other than at the centre of the settlement - a new freestanding, out-of-centre commercial centre is not supported. If any new Blindwells town centre is to perform a wider role, this must be taken in to account in any masterplan for the new settlement, including in respect of access, phasing, construction and in the development appraisal. Appropriate comprehensive solutions for any larger Blindwells Development Area would be required.

5.29 The LDP should identify a network and hierarchy of centres and their role and function. A key task in this will be to consider if there is any merit in introducing any new town centre at Blindwells that may remould and would complement the current network and hierarchy of centres in the area.

Table 6: Town Centres

<p>Preferred Approach</p>	<p>Promote a new town centre at Blindwells and also maintain current network and hierarchy of town centres: A retail capacity study would be prepared by the Council to define a hierarchy for the network of centres and their catchments. Based on these catchments it would also report on the ability of centres to support acceptable levels of retail floor space in future.</p> <p>Depending on the outcome of work on the expansion of Blindwells, a new town centre may be promoted there, which may also serve a wider area than the new settlement, if the scale and nature of growth and access solutions justify and support this. Appropriate catchment areas will be specified and an appropriate location would need to be found in the centre of the new settlement.</p> <p>The current hierarchy and network of town centres would be retained and strategies would be prepared to provide a vision for each town centre to help address local environmental issues as well as their vibrancy, vitality and viability. These strategies will be prepared once the LDP is operative, and will be carried forward as non-statutory guidance. Local centres at Wallyford and Blindwells (current allocation) would also continue to be supported. New local centres may be promoted at selected new locations too if appropriate.</p> <p>In relation to existing town centres the sequential approach would be followed.</p>
<p>Reasonable Alternative</p>	<p>Maintain current network and hierarchy of town centres: A retail capacity study would be prepared by the Council to define a hierarchy for the network of town centres and their catchments. Based on these catchments it would also report on the ability of centres to support acceptable levels of retail floor space in future.</p> <p>The current hierarchy and network of town centres would be retained and strategies would be prepared to provide a vision for each town centre to help address local environmental issues as well as their vibrancy, vitality and viability. These strategies will be prepared once the LDP is operative, and will be carried forward as non-statutory guidance. Local centres at Wallyford and Blindwells</p>

(current allocation) would also continue to be supported. New local centres may be promoted at selected new locations too if appropriate.

In relation to town centres the sequential approach would be followed.

Question 4: Town Centres

Subject to the ability to expand Blindwells, do you support the introduction there of a new town centre (preferred approach)?

If so should it:

- a. serve only the new settlement; or**
- b. serve the new settlement and a wider area?**

Do you support retention of the current network and hierarchy of existing centres (preferred approach and reasonable alternative)?

Please explain your answers. If you support neither the preferred approach nor the reasonable alternative, what alternatives do you suggest?

The intention is to prepare strategies for each town centre, what ideas do you have for improving your town centre (please specify the town centre you are referring to in your answer)?

Planning for Employment

Employment Land Supply

- 5.30** SPP notes that LDPs should promote a range and choice of sites to meet the needs of different business sectors¹⁹. The approved SDP requires that 76 hectares of employment land be maintained in East Lothian²⁰. It also identifies four strategic employment sites in East Lothian²¹. These are the existing allocated sites at Craighall Business Park, Musselburgh and at Blindwells, Macmerry and at Spott Road Dunbar²². The SDP does not preclude a review of other sites currently proposed for employment use or the identification of new sites for employment.
- 5.31** The LDP may also consider if there are any circumstances where mixed use development on strategic employment sites, including support and ancillary services to employment uses, could be accepted in principle. Although normally to be resisted, opportunities to create mixed communities with housing and retail development alongside strategic employment opportunities may be considered in the preparation of the LDP. Any employment land lost from the supply must be augmented in the plan making process, meaning the quantity of employment land remaining on sites must be specified if a mix of uses is proposed.
- 5.32** There is scope for non-strategic employment sites to be removed, added and / or promoted for mixed uses. Existing strategic employment proposals and / or new strategic employment proposals may be made more flexible concerning the mix of land uses that can be developed. For all employment sites alternative policy approaches may be followed, for example in respect of support and ancillary services to employment uses, including in relation to existing operational employment areas. However, 76ha of employment land must be retained in the area.
- 5.33** Although the current East Lothian Local Plan 2008 allocates a substantial amount of land for employment use, very little of this has been developed. Much of this land is in the control of parties seeking to develop the land for alternative uses: in addition, the scale of demand and potential users are unlikely to deliver the investment needed to achieve the servicing and delivery of employment on much of this land. Much of this land has remained undeveloped through successive development plans whilst some has been developed for uses other than employment, including housing.

¹⁹ Scottish Planning Policy paragraph 93 - 105

²⁰ SESplan SDP paragraph 93 - 96 and Policy 2

²¹ SESplan SDP Figure 8

²² SESplan SDP Economy Technical Note paragraph 5.3

5.34 A significant challenge for the Council and for the LDP is to increase the job density in the area and to ensure that opportunities for job creation and economic growth are generated alongside an increase in population and the delivery of new homes. It may be that housing has an enabling role to play on some sites to ensure that serviced employment land is released for employment growth and job creation, alongside housing.

Table 7: Planning for Employment

<p>Preferred Approach</p>	<p>Promote mixed use strategic and local employment sites where appropriate: Maintain the quantity of the current employment land supply, and review the contribution that existing employment proposals make to this supply. This review would consider:</p> <ol style="list-style-type: none"> 1. Whether or not existing employment proposals should remain allocated for employment use either in whole or part, or in the case of non-strategic employment proposals not at all; 2. If any non-strategic employment proposal is no longer considered appropriate solely for employment use what alternative mix of uses would be appropriate, or if it should no longer be promoted for any type of development; 3. If any employment proposal is to be retained only in part for employment use, the mix of employment and any other land uses it is suitable for must be specified by the LDP. Any such proposal must guarantee the servicing of, development and release of the remaining part of the employment site, or the same in relation to any replacement employment land, for employment use. The area of land remaining for employment use would need to be specified and defined on the proposals map, together with the area of land and other land use(s) for which the remaining part of the site could be developed. Those parties promoting mixed use development on sites must specify and agree with the Council the area and part of the site that would be made available for employment use. Delivery mechanisms and timescales for the release and servicing of the employment land would also need to be set out by the LDP. <p>New employment proposals may also be identified. These could be solely for employment use or may be for a mix of employment and other uses. If a mix of uses is promoted in association with a new employment proposal the approach to this must follow the same principles as set out at point 3 above.</p> <p>In all circumstances the location for the proposed employment uses, and / or mix of employment uses and other uses, must be appropriate and be able to co-exist satisfactorily and with those others uses proposed and / or that exist in the area. If any housing land were released as a result of this review then that housing land would contribute towards strategic housing land requirements.</p>
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	The degree of policy support would be extended for ancillary non-employment uses on employment proposals and / or existing areas designated for employment to include support services as well as retail activity ancillary to the main employment use.
Reasonable Alternative	<p>Maintain strategic employment sites for employment but promote mixed use local employment sites: Maintain the quantity of the current employment land supply. Retain all existing strategic employment sites as they are. Only review the contribution that existing non-strategic employment sites make to the supply. In relation this review the same approach would be followed as for the preferred approach as relevant.</p> <p>The degree of policy support would be extended for ancillary non-employment uses on employment proposals and / or existing areas designated for employment to include support services as well as retail activity ancillary to the main employment use.</p>

Question 5: Planning for Employment

Do you think that the review of the employment land supply should be as set out under the preferred approach, alternative approach, or neither?

Please explain your answer. If you support neither of the above options, what alternatives do you suggest?

Planning for Housing

The Housing Requirement and Need for Additional Housing Land

- 5.35** SPP notes that LDPs should provide a generous land supply and promote a range and choice of sites to meet housing requirements²³. The approach to planning for housing in East Lothian must align with the SDP and its associated Supplementary Guidance on Housing Land. In addition to setting housing requirements these documents note East Lothian's commuting travel pattern, its low job density, the concentration of available employment in the city, the focus of demand for housing particularly in the west of East Lothian and the constrained infrastructure and transport capacity, as well as the need to consider the capacity in existing settlements and their landscape settings to absorb strategic growth.
- 5.36** Policy 5 of the approved SDP together with its associated Supplementary Guidance on Housing Land requires the LDP to ensure land is available for the delivery of 6,250 dwellings in the period 2009 to 2019 as well as for a further 3,800 dwellings in the period 2019 - 2024²⁴. In total, land which is effective or capable of becoming effective is needed to ensure 10,050 dwellings can be developed in the period 2009 to 2024. The SESplan HoNDA also suggest that housing land able to accommodate in the region of a further 3,820 dwellings may be needed in East Lothian for the period 2024 – 2032, although the SDP does not require land to be allocated by the LDP for the period beyond 2024.
- 5.37** Since 2009, the base date of the SDP, 1,321 dwellings were completed in East Lothian up to 2013. In addition, at 2013 the area had a significant amount of allocated and available housing land which would allow the development of a further 6,332 new homes. In total, this amounts to land for 7,653 homes. The SDP requires the LDP to retain and focus on the delivery of this established housing land²⁵. The SDP is also clear that new housing land allocations brought forward by the LDP must complement and must not undermine the ability to develop existing housing land allocations.
- 5.38** The proportion of the established land supply that is 'effective'²⁶ and the programming for its development through time will influence the amount of new land that the LDP needs to find for each plan period to meet the SDPs housing requirements. Based on the agreed 2013 housing land audit, additional land capable of delivering around a further 2,000 homes up to 2019 and around a further 1,650 homes in the period 2019 – 2024 would be needed in addition to existing sites²⁷. The established housing land supply could also deliver around 1,200 homes beyond 2024.

²³ Scottish Planning Policy paragraphs 109 -125

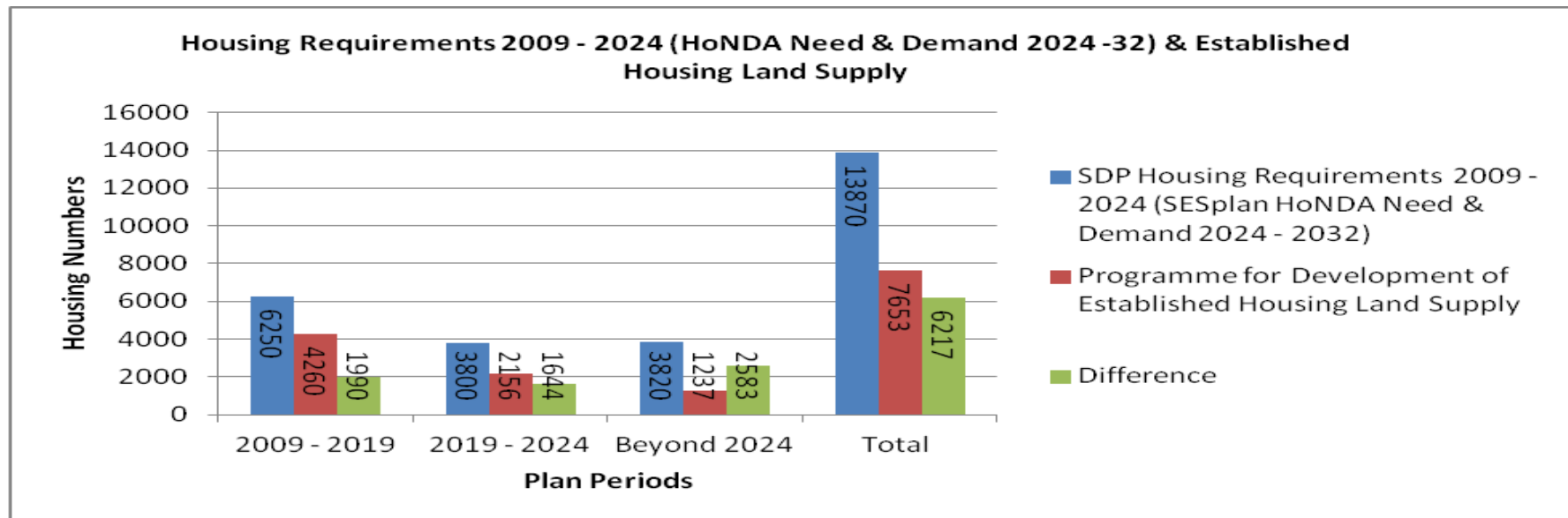
²⁴ SESplan SDP Policy 5 & Consultative Draft SG on Housing Land Table 3.1

²⁵ SESplan SDP paragraph 108 and 55

²⁶ See Appendix 1 for further information on the concept of an effective housing land supply

²⁷ Based on Housing Land Audit 2013

- 5.39 However, the programming of house completions from sites means that land with a total capacity of more than 10,050 homes will be required. This is because not all of the capacity of individual sites will be built out within the plan periods: it is the cumulative output from a range of different sites that will be needed; the development of some sites may also extend well beyond the plan period. A generous housing land supply will be needed to allow the housing requirement to be met. However, the rate of development that will be delivered is not within the control of the planning authority, as this is dependent on many other factors, including the strength of the housing market. Delivering enough dwelling completions to meet the SDP's housing requirement will require a rate of annual completions in East Lothian well over double the highest rate which has ever been achieved in the past. Yet there is a need to make sufficient housing land available that could allow the housing requirement to be met, consistent with the SDP.
- 5.40 Allocating the right amount of housing land in the right place will be a significant and challenging task for the LDP. Residential development is the single biggest urban land use. It generates many other 'spin-off' development requirements as well as demand for other land uses and additional capacity in infrastructure and services to accommodate the impacts population growth brings. The location of new housing relative to employment opportunities and services also influences the need to travel and the distance that need be travelled to access them. Given the nature of East Lothian and its settlements, it is likely that greenfield land will be needed to meet the vast majority of the SDP's strategic housing land requirements.



Spatial Strategy Implications

- 5.41 The preferred 'compact' spatial strategy would focus the search for new housing land in the short to medium term on the main towns in the west of East Lothian's Strategic Development Area (SDA) as far as it reasonably can. However, this is subject to the availability of appropriate sites and infrastructure capacity, and the ability to fund and deliver increased capacity in view of the resources available to implement the plan. SDP Policy 5 requires the LDP to indicate the phasing and mix of uses for sites, where appropriate.
- 5.42 However, SDP Policy 7: Maintaining a Five Year Housing Land Supply also allows the LDP to allocate greenfield land for housing development either within or outwith the SDA²⁸. SDP Policy 7 may be applied to any settlement in East Lothian. Any proposal promoted under SDP Policy 7 must be in keeping with the character of the settlement and local area, must not undermine green belt objectives, and any infrastructure required must be committed or funded by the developer. In the preparation of the LDP the application of SDP Policy 7 is discretionary.
- 5.43 Importantly, there is a need to select different site types and sizes for new housing. This is because smaller sites may be more deliverable to meet short term requirements to 2019, whereas larger sites tend to have longer lead-in periods and are likely to contribute more significantly towards requirements in the period 2019-2024. In the preparation of the LDP it will be important to select appropriate sites which, when developed together, can ensure an effective housing land supply can be maintained at all times to meet the requirements up to 2019 and in the period 2019 - 2024. This will require an appropriate balance between the provision of appropriate large and smaller scale sites.
- 5.44 Overall, it must be demonstrated that, at the point the LDP is to be adopted, sufficient housing land will be available to meet the SDP's housing requirements and to maintain a five year effective housing land supply. The search for land to meet these objectives is to be focused on the SDA. Yet environmental and infrastructure constraints in the SDA, the resources available to implement the plan, or the need to ensure existing committed sites are complemented and not undermined, may mean that the search for land to maintain a 5 year effective housing land supply needs to extend outwith the SDA. The contribution to the housing land supply that any SDP Policy 7 allocation would make will also contribute towards meeting the SDPs housing requirements. **At this stage, the preferred and alternative housing sites to meet the SDP's housing requirements to 2019 and to 2024 and to maintain an effective five year housing land supply are set out in the cluster analysis section that follows this section. A summary of the analysis is set out at paragraph 6.112 in Table 26. It shows how the SDPs housing land requirement might be met using the preferred MIR sites. However, those parties promoting potential development sites must prove the effectiveness of their sites to the Council's satisfaction before any site may be included in the Proposed LDP.**

²⁸ SESplan SDP paragraph 116 and Policy 7

Blindwells Role in Meeting Housing Requirements

- 5.45** The approved SDP has a long-term vision for Blindwells new settlement: this is the creation of a large scale new mixed community that will contribute to meeting housing land requirements up to 2032 and beyond. The SDP requires the LDP to seek comprehensive solutions that may allow the new settlement to expand from its current allocation of 1,600 homes to around 4,600 homes. If comprehensive solutions are found for a larger new settlement, this would allow the likely scale of the new settlement to be confirmed and an area of land to be identified within which development of a larger new settlement may take place²⁹. As such, this MIR identifies a 'Blindwells Expansion Area of Search' as the area for which comprehensive development solutions for a potential larger new settlement should be investigated. The SDP also notes that the principles of the current Blindwells local plan proposal may need to be reviewed as part of this.
- 5.46** The approved SDP expects that Blindwells need only contribute housing land to its spatial strategy after 2019. It expects no more than the numerical requirement for 1,600 homes already allocated to the new settlement to be delivered by 2032³⁰. Notwithstanding this, if comprehensive solutions for the delivery of the entire and potentially larger new settlement are found³¹ the SDP would not preclude more housing land being developed within any finalised Blindwells Development Area in the short to medium term. The LDPs MIR has a key role in highlighting and creating the context for consulting on potential development strategies and seeking to find comprehensive solutions that would be required to finalise any larger Blindwells Development Area, including how these options will impact on the timescales within which it can deliver housing land through time. This will inform the approach to Blindwells set out in the Proposed LDP.
- 5.47** Importantly, the implication of not being able to bring forward housing land at Blindwells in the short to medium term may be an increased need to identify greenfield land for housing elsewhere in East Lothian in order to meet housing requirements. This land would likely need to be found around existing settlements. The implication of expanding the current Blindwells allocation without a clear comprehensive strategy and agreed solutions for how a single new settlement can be delivered would bring the same implications for the use of greenfield land but may also result in piecemeal development in the open countryside. This would undermine the SDPs vision for Blindwells.
- 5.48** The possible policy and strategy approaches for Blindwells are discussed further in the Cluster Analysis Section that follows this section.

²⁹ SESplan SDP paragraph 53

³⁰ SESplan SDP paragraphs 53-54

³¹ SESplan SDP Paragraph 53

Consideration of Housing Development Beyond 2024

- 5.49** The approved SDP ‘signposts’ that housing land for around an additional 48,000 homes may be needed in the SESplan area in the period 2024 – 2032. On the basis that allocated land may continue to be developed during that period, the strategy for delivering a proportion of those 48,000 homes is likely to align with the current SDP strategy³². However, the SDP does not specify any housing requirement for East Lothian that needs to be met in the period 2024 - 2032. Yet the SESplan HoNDA signposts in the period 2024 – 2032 there may be a need and demand for a further 3,820 dwellings in East Lothian. The SDP also suggests that the LDP may be able to identify opportunities for growth beyond 2024.
- 5.50** Any opportunities for housing development beyond 2024 in East Lothian may be limited in scale at this stage to that which can be delivered on existing allocated sites that are not expected to be fully developed by 2024. Blindwells is a location that is intended to have such a role post 2024, which may be enhanced if comprehensive solutions for development of a wider area are found. The SDP is also clear that sites may be safeguarded for future housing development post 2024. This may also be relevant to Blindwells (if comprehensive solutions are not found) as it might to other sites that may logically be safeguarded for potential housing development in the longer term. However, the LDP may allocate sites that can contribute to housing requirements to 2024 and beyond if they are of a size that could continue to be developed beyond 2024. This may be particularly relevant if any such larger sites offer more appropriate locations for development than smaller sites able to be fully or substantially completed by 2024. However, this may result in a substantial over allocation of housing land in East Lothian above the SDP’s confirmed housing requirements to 2024. Notwithstanding this, it may be that the delivery of additional homes beyond 2024 in East Lothian could substantially provide for any part of the city region’s future housing requirement that may be directed to East Lothian post 2024 in the review of the current SDP.
- 5.51** However, planning for the longer term in advance of the review of the current SDP, and in isolation from a comparative analysis of environmental and infrastructure opportunities and constraints across the city region, may result in the misdirection of development and scarce recourses. For example, in the review of the SDP, SESplan may seek to direct any additional growth in the city region to locations west of East Lothian that are or will become more accessible during the next SDP period or that contain or are closer to more employment and better transport opportunities than currently available in East Lothian. There may also be more scope in the city region than currently anticipated to prioritise the redevelopment of brownfield land and / or the form of the green belt may change. Importantly, NPF3 notes that the longer term spatial strategy for the city region as a whole needs to acknowledge and address the city regions infrastructure constraints. However, setting out a longer term spatial strategy for East Lothian in the emerging LDP may provide a context to help find technical and funding solutions for the provision of additional infrastructure capacity here in the short, medium as well as in to the longer term.

³² SESplan SDP paragraph 112 & Table 2

Table 8: Planning for Housing

<p>Preferred Approach</p>	<p>Plan for a longer term housing strategy: Conform to the approved SDP and identify land which is able to be developed to deliver 6,250 homes to 2019 and a further 3,800 homes in the period 2019 – 2024, but do not limit the scale of land release to that which is needed to meet only those requirements.</p> <p>The preferred approach is also to find land within which an expanded Blindwells could be developed, subject to appropriate phasing and comprehensive solutions being found. Otherwise potential expansion land may be safeguarded. In addition, subject to infrastructure capacity, funding solutions and appropriate delivery mechanisms being found, identify appropriate new sites which can help meet housing requirements to 2019 and in the period 2019 - 2024 that help maintain an effective five year housing land supply even if their development would extend beyond 2024.</p> <p>The selection of new sites to meet the SDPs housing requirement for 6,250 homes to 2019 and a further 3,800 homes in the period 2019 – 2024 would generally be guided by the following priorities:</p> <ul style="list-style-type: none"> • Intensify existing allocations that are located in the SDP’s SDA if their capacity can be increased and provided development of the additional homes can start during the LDP period; • Identify other appropriate new land in, or as an expansion of an existing settlement / expansion of an existing allocation, prioritising locations within the SDA, but also include consideration of land outwith the SDA if required to maintain an effective five year housing land supply. New allocations could be of varying sizes, provided they can start and be substantially completed in the LDP period and do not undermine existing allocations or any expansion of them; • Allocate a Blindwells Development Area, including the area of the current local plan proposal, as well as any other land within which a further expansion could be supported and / or safeguard as appropriate; • Safeguard other land for future consideration – e.g. because it is a logical expansion of an existing allocation but development of any further expansion land would be unlikely to start or would be inappropriate if it did start during the LDP period.
<p>Reasonable Alternative</p>	<p>Plan to meet known housing requirements: Conform to the approved SDP and identify land which is able to be developed to deliver 6,250 homes to 2019 and a further 3,800 homes 2019 – 2024 prioritising locations within the SDA, but limit the scale of land release in so far as possible to that which is needed to meet only those requirements. This approach would also seek to identify land within which an expanded</p>

Blindwells could be developed, subject to appropriate phasing and comprehensive solutions being found, otherwise potential expansion land should be safeguarded. An effective five year housing land supply would be maintained at all times.

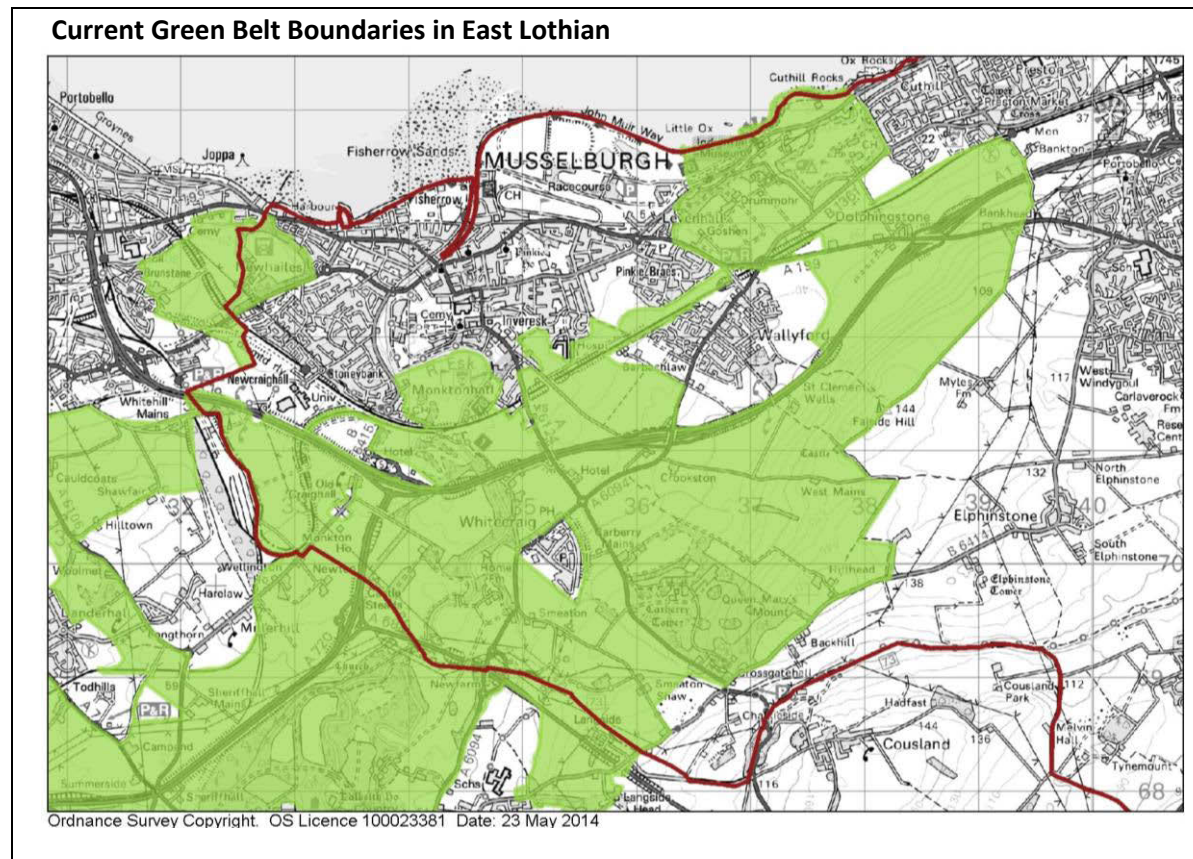
Question 6: Planning for Housing

Should the LDP plan for a longer term settlement strategy to meet the SDPs housing requirements as well as help contribute to signposted need and demand for housing post 2024 (preferred approach), or should it plan only to meet the SDPs confirmed housing requirements to 2019 and 2024 (alternative approach), or neither?

Please explain your answer. If you support neither of the above options, what alternatives do you suggest?

Green Belt

5.52 Edinburgh Green Belt boundaries within East Lothian are to be defined by the LDP, and may be modified if appropriate to ensure that the strategic growth requirements of the SDP can be met. However, existing Green Belt boundaries do not need to be modified in East Lothian since East Lothian's SDA extends beyond the Green Belt. The plan below illustrates the current Green Belt boundaries in East Lothian.



5.53 The SDP acknowledges that the Green Belt is an important policy for protecting and enhancing landscape character and settlement identity and for providing access to open spaces. It can also be used to support regeneration by directing planned growth to the most appropriate locations. In certain circumstances the coalescence of settlements may be accepted, for example if this would lead to a more sustainable settlement pattern. Policy 12 of the SDP does not provide for new green belts to be designated; however, it makes clear the requirement to maintain a Green Belt around Edinburgh and to minimise the impact of accommodating growth on Green Belt objectives. To assist with this, a landscape based review of the Edinburgh Green Belt was carried out in 2008. It identified certain parts of the Edinburgh Green Belt that contribute to a lesser degree to Green Belt objectives. There are also certain Green Belt locations that are well related to strategic transport corridors and public transport opportunities.

5.54 In addition to Green Belt objectives, the LDP must also consider the effect of directing growth beyond the Green Belt, particularly housing. Directing growth beyond the Green Belt may: increase distance between new homes and the existing main centres of employment and available jobs in the wider city region; move development away from where there is greatest pressure to satisfy the majority of mobile demand for housing; generate a need to commute longer distances, including by private car, and increase transport based CO₂ emissions; result in regeneration opportunities being missed. These matters need to be considered as part of the spatial strategy and when selecting sites. Existing settlements are to be excluded from the Green Belt as should major educational and research uses, and any major business and industrial operations. This will have implications for how Green Belt boundaries are defined. The LDP must also specify the types of development that will be appropriate within the Green Belt.

Table 9: Green Belt

Preferred Approach	<p>Modify the boundaries of the Edinburgh Green Belt: Only release land from the Green Belt for new built development in the following circumstances:</p> <ul style="list-style-type: none"> • If it is justified by a need to accommodate strategic development requirements and it would direct development to more suitable sites than could be achieved beyond the Green Belt, such as where regeneration can be promoted and / or where public transport accessibility is good; and • If the coalescence of settlements would be a consequence, then this will only be supported if the advantages of the site in question clearly outweigh those of other sites and the resultant loss of settlement identity that would arise from its development; and • If new long term and defensible Green Belt boundaries could be defined.
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	Where land is released from the Green Belt every effort must be made in the subsequent master planning process to ensure the introduction of green corridors, wedges, open spaces and woodland planting etc, particularly if coalescence of settlements is accepted as a justified part of the settlement strategy and, where appropriate, to define new defensible Green Belt boundaries. No change to be made to the uses and type of development that would be considered appropriate in the Green Belt.
Reasonable Alternative	Do not modify the boundaries of the Edinburgh Green Belt: Promote no change to Green Belt boundaries and make no change to the uses and type of development that would be considered appropriate in the Green Belt.

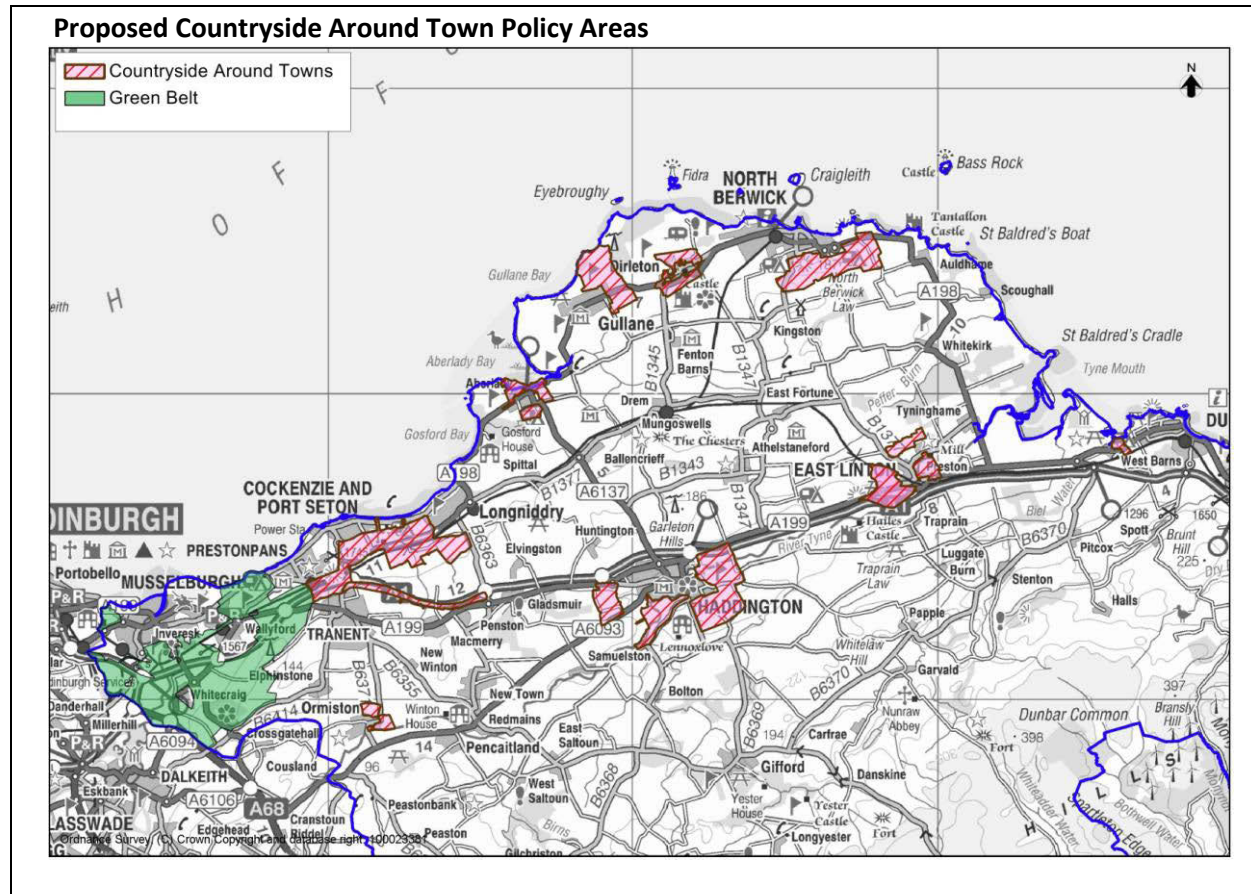
Question 7: Green Belt

In terms of the approach to Green Belt, do you support the preferred approach, the reasonable alternative, or neither?

Please explain your answer. If you support neither of the above options, what alternatives do you suggest?

Countryside Around Towns

5.70 There are a number of areas beyond the Green Belt which have been the subject of development pressure for many years, but which would be better left open and undeveloped because they are important to the character of the local area. These are illustrated on the map below and at Appendix 5:



- 5.71 Whilst these areas may be important to the setting and identity of settlements and / or to provide a setting to other landscape features, a Green Belt designation over them would be inappropriate. This may be because the current Green Belt could not be reasonably extended in to those areas, or because they are some distance from the current Green Belt. The SDP does not promote the designation of new Green Belts.
- 5.72 The SDP supports the creation of other countryside designations which would perform a similar role to a Green Belt designation, such as Other Countryside Designations / Countryside Around Town Designations³³. The LDP may consider and justify if there is a role for any such designations in its area, explaining what this is intended to achieve and identifying where any such designations would be applied.
- 5.73 In addition to seeking to retain separation between communities and /or retain an appropriate landscape setting for them or for other important landscape features, one reason to promote this type of policy would be to clearly identify in advance locations where, in the Council's view, Policy 7 of the SDP should not be applied.
- 5.74 Any opportunities to contribute to the objectives of the Central Scotland Green Network are also to be identified in association with such new policy designations.

Table 10: Countryside Around Towns

Preferred Approach	<p>Introduce Countryside Around Town designations: Such designations could be promoted where the setting and identity of settlements or landscape features not in the Green Belt merit protection from significant built development. A new policy would be introduced to define the types of development which should be resisted in such areas unless there are exceptional circumstances, such as for essential infrastructure, or for community uses which would not compromise the setting of the settlement or landscape feature, or where a proposed development would complement the feature to which the designation relates, or where the proposal would effect landscape improvement, including contributing towards CSGN objectives. This approach could be followed including in the following locations:</p> <ul style="list-style-type: none"> • The land beyond the Green Belt between Tranent/ Macmerry/Prestonpans/ Cockenzie / Port Seton, Longniddry, Blindwells, and St Germain's;
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³³ SESplan SDP Policy 13 and paragraph 132.

	<ul style="list-style-type: none"> • Around North Berwick Law, between it and the planned new southern edge of the town; • To the south, west and east of Haddington; • Between Dunbar and West Barns; • Villages including Ormiston, Aberlady, Gullane, Dirleton and East Linton. <p>Such a designation would imply greater permanence to the presumption against built development in those locations than might the application of a countryside designation. Potential Countryside Around Town policy areas are shown at Appendix 5.</p>
Reasonable Alternative	Do not introduce Countryside Around Town designations.

Question 8: Countryside Around Towns

In terms of the potential to introduce Countryside Around Town designations as a new policy approach, do you support the preferred approach, the reasonable alternative, or neither?

Please explain your answer. If you support neither of the above options, what alternatives do you suggest?

Central Scotland Green Network

5.75 The Central Scotland Green Network (CSGN) is a national development set out in NPF3. The LDP must therefore support CSGN objectives and identify opportunities to implement it in East Lothian. CSGN aims to bring about a step change in environmental quality, woodland cover and recreational opportunities in the area, and to seek connections through it with adjoining areas for the movement of people and wildlife. The Green Network should also complement other initiatives or policy objectives, such as Green Belt or any potential countryside around town designations. SPP also emphasises planning's role in enhancing green infrastructure.

5.76 SESplan requires the LDP to identify opportunities to contribute to the development and extension of the CSGN in to East Lothian. This should be considered an integral part of place making and this should help to optimise the delivery of a range of economic, social and environmental benefits. Major developments should contribute towards the CSGN and connectivity over local authority boundaries is to be sought. SESplan identifies some strategic CSGN opportunities for East Lothian and these are noted below:

- Edinburgh City Bypass: there is a need to address connectivity for species and active travel across the bypass
- Esk Valley opportunities: key woodland habitat network project in the North and South Esk Valley
- Shawfair/Edinburgh South East Wedge (although in Midlothian there are links to East Lothian)
- Wallyford – Tranent: opportunity for network enhancement through delivery of development
- Blindwells: opportunity for network enhancement through delivery of development
- Potential upgrade of the A1 along the coast – project related to transport with consideration of green network objectives
- Development of the John Muir Way and formalisation of the round the forth cycle route and No 1 Cycle route
- Forth Estuary – opportunity for landscape scale inter-tidal habitat restoration project
- Opportunities for riparian planting in East Lothian to meet RBMP objectives

5.77 The CSGN to be a multifunctional network of green and blue spaces (e.g. rivers and ponds etc) connecting our towns and villages with the wider countryside and coast. It is to include areas important for recreation, active travel, biodiversity and landscape character. The proposed overall aim for the CSGN in East Lothian is “to create a network which connects habitats and communities, improves access to the countryside and the coast, and enhances the character and appearance of the area”.

- 5.78** At this early stage existing assets which could contribute to the creation of a green network have been examined. These include active travel routes such as Core Paths, Sustrans Cycle Routes, Rights of Way and recreational routes such as the Railway Walks. For biodiversity, international, national and local sites were considered, along with woodland, wetland and grassland areas. Popular outdoor recreational destinations were also identified, such as woodlands, beaches, hills, riverside walks, John Muir Country Park and Levenhall Links.
- 5.79** Based on this initial survey and the consideration of related opportunities, locations which do or could contribute to a green network were identified. Particular attention was given to those areas where multiple benefits could be secured, for example, where recreational routes lead to the coast as well as provide habitat value, and where there may be opportunities to connect multifunctional areas. The plan on the following page shows the outcome of this initial work and illustrates an indicative framework against which more detailed work on the green network in East Lothian could be progressed.
- 5.80** It is likely that a strategy plan of this nature would be included in the LDP, but the detail reserved for Supplementary Guidance (SG). This is because there would be too much detail to include a strategy for the green network in the plan itself and it should complement SESplan's Green Network Strategy once it is in place³⁴. The SG would follow the same approach as set out above and would draw on and seek to align with other relevant strategies such as the Core Path Plan and Biodiversity Action Plan. It would identify the green network opportunities in detail for each cluster area including where strengthening is needed.
- 5.81** The main function of the green network may be different in different cluster areas. For example, in Musselburgh it may be more important to promote good quality active travel, while in Dunbar access to the coast and countryside for recreational purposes may be more to the fore. In addition, when setting down development principles for sites, including in any Supplementary Guidance prepared for them, the LDP could require CSGN objectives to be furthered, for example by ensuring that structure planting is provided in association with new development and that it is designed to make effective habitat links through a development site and to the surroundings; by replacing trees that need to be removed to facilitate development; requiring the creation of active travel routes and by realising opportunities to improve habitat.

³⁴ SESplan SDP Action Plan Action 106

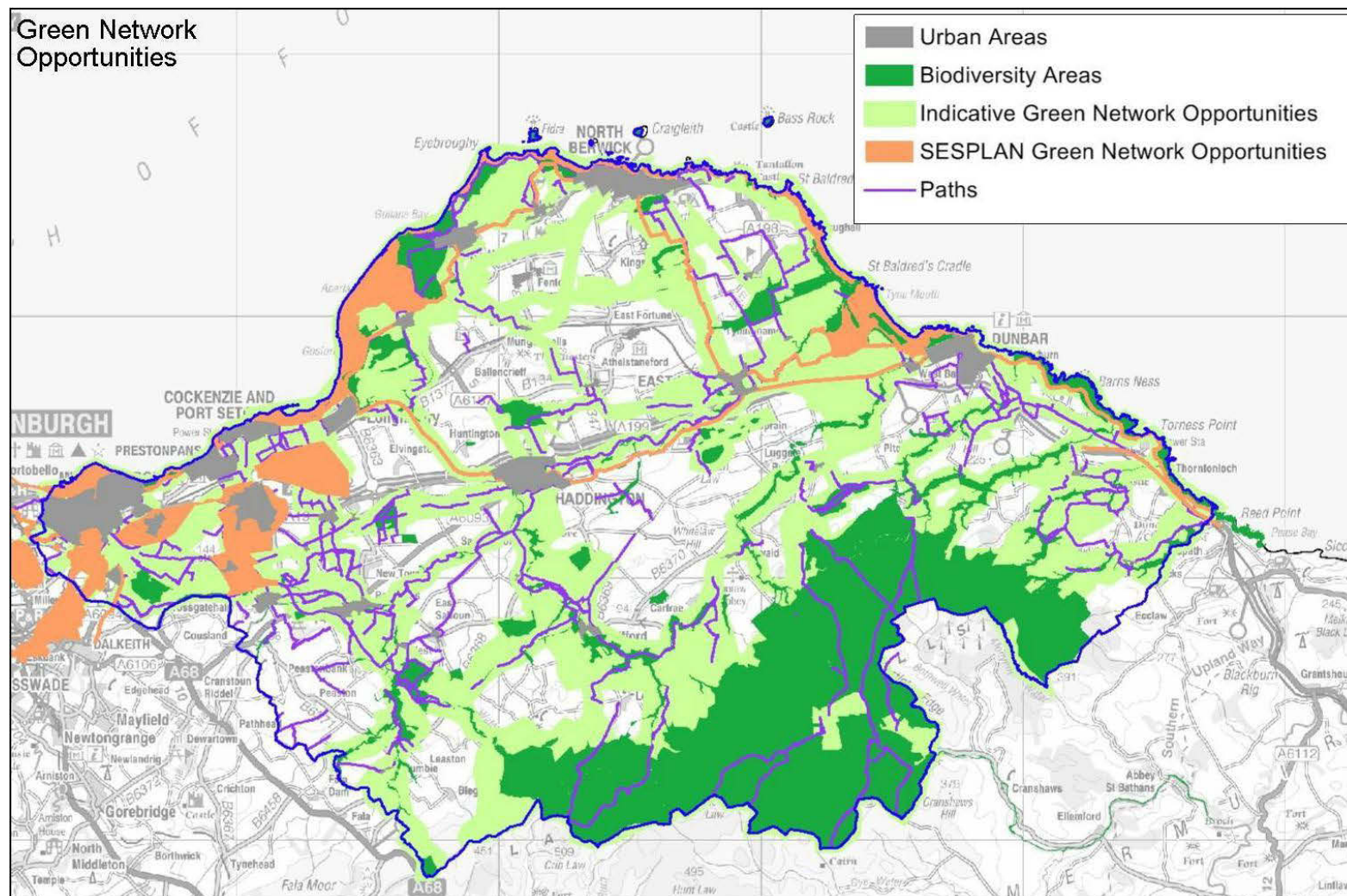


Table 11: Central Scotland Green Network

Preferred Approach	General strategy supported by Supplementary Guidance: Illustrate CSGN objectives on a general strategy plan for the LDP, such as that shown opposite. The LDP policies and proposals would provide protection to existing features that contribute to CSGN objectives in this strategy area and seek to make connections between them, including in the development of sites. Supplementary Guidance would be prepared to explain the CSGN strategy for the area in greater detail. It would highlight opportunities to integrate with other plans, policies and strategies, such as the Edinburgh & Lothians Forestry & Woodland Strategy, and set out a long term vision for the green network in East Lothian.
Reasonable Alternative	General strategy with no Supplementary Guidance: Illustrate CSGN objectives on a general strategy plan for the LDP, such as that shown opposite. The LDP policies and proposals would provide protection to existing features that contribute to CSGN objectives in this strategy area, and seek to make connections between them, including in the development of sites.

Question 9: Central Scotland Green Network

In terms of approach to the Central Scotland Green Network in East Lothian, do you support the preferred approach, the reasonable alternative, or neither? Please explain your answer. If you support neither of the above options, what alternatives do you suggest?

What do you think the priorities are for the green network for East Lothian or for your local area?

Development in the Countryside and on the Coast

Development in the Countryside

- 5.82** The SDP recognises the importance of the countryside to the area's desirability as a place to live, work, do business and visit and in providing amenity. Yet the approach to the management of development in the countryside is not a matter covered by the policies of the SDP. However, it notes there is a need to reconcile the potentially competing demands for appropriate rural development and to maintain and enhance the character and appearance of East Lothian's countryside. SPP provides the national policy on appropriate approaches to rural development in different areas.
- 5.83** SPP recognises that there are different types of rural area and a variety of development pressures on them. In particular, SPP notes that countryside areas accessible from cities and main towns, such as East Lothian, should be protected against unsustainable growth in car based commuting and the suburbanisation of the countryside³⁵. The LDP should respond to the specific circumstances of its rural area while supporting diversification and growth in the rural economy, including appropriate tourist related development and digital connectivity. Currently such development proposals in the countryside are assessed against criteria based policies of the local plan, including Policy DC1: Development in the Countryside and Undeveloped Coast. It is particularly supportive of proposals for the diversification of the rural economy, where they are of an appropriate scale and character and have an operational requirement for such a location.
- 5.84** Policy DC1 also supports new housing where justified as an operational requirement in association with agriculture, forestry or countryside recreation. It also supports the conversion and rehabilitation of redundant vernacular buildings in the countryside (of which many remain) to other appropriate uses including residential use, a policy approach that would be undermined were new housing to be permitted in the countryside instead of on sites in or allocated adjacent to existing settlements. In certain circumstances it also allows enabling housing development in the countryside to support appropriate uses. It is also in the countryside where certain infrastructure and renewable energy proposals come forward, including wind turbines. In addition, minerals can only be worked where they are found and East Lothian has deposits of sand and gravel, coal, hard rock and aggregates in its countryside. These types of proposal are assessed against criteria based policies, the review of which has raised no major issues.
- 5.85** In areas such as East Lothian, SPP suggests that a restrictive approach to new housing development in the countryside is appropriate. SPP notes that some types of housing development in rural areas, including the replacement of derelict houses and steadings, as well as new housing and the conversion and rehabilitation of buildings, may be appropriate if proper integration with the surroundings can be achieved. In exceptional

³⁵ Scottish Planning Policy paragraph 74 - 83

circumstances, affordable housing may be appropriate adjacent to existing settlements on land not allocated for this purpose³⁶. Where the modernisation and conversion of steadings is concerned, this need not be contained to the original building envelope unless for compelling design or conservation reasons. However, SPP is clear that the approach to development in the countryside in pressurised areas must not result in its suburbanisation or unsustainable car based commuting. For areas such as East Lothian, SPP confirms that most new housing development is to be in or adjacent to existing settlements. The loss of prime quality agricultural land is also to be minimised.

- 5.86** Policy DC1 supports appropriate rural diversification and business uses in the countryside including those associated with agriculture, horticulture, forestry and countryside recreation. New housing is also supported, albeit in limited and specific circumstances. New housing may be supported in the conversion of an existing farm steading if this would complete its original form, or is a logical extension to the existing steading and in keeping with its scale, form and character, or if justified by an operational requirement in association with another business use supported in the countryside, or where residential development would enable an employment, tourism or leisure development or where this would provide funding to enable the restoration of a listed building or other feature of the built or natural environment the retention of which is desirable.
- 5.87** In some cases temporary residential accommodation may be approved until a business has established and it is demonstrated that the need for permanent accommodation in association with it is justified. In November 2011 the Chief Planner set out the Scottish Governments position on the use of occupancy conditions to restrict the occupancy of new dwellings in the countryside to people employed in a rural business. In areas such as East Lothian occupancy conditions have continued relevance, albeit that planning conditions are the preferred mechanism for securing this objective and some amendment to Policy DC1 is needed to reflect this change in practice.
- 5.88** In the specific circumstances of easy accessibility to the city and in the interests of maintaining the character of the countryside it is not appropriate to be permissive to new houses, or employment of an inappropriate scale or character, in the East Lothian countryside. SDP Policy 7 allows the LDP to make small scale allocations for housing development on greenfield land within and outwith the SDA. This confirms that a plan led-approach to the identification of greenfield sites for housing development in the countryside is normally expected. Windfall proposals for development of housing on greenfield land in those areas should normally be resisted. The intentions of SPP and the SDP in this regard are reflected appropriately in the current policy approach set out in local plan Policy DC1, and that these policy principles should generally continue to be followed.
- 5.89** However, it may be that a more flexible approach to windfall housing proposals in the countryside could be considered in certain circumstances. This may have implications for Policy DC1 as it relates to those parts of the countryside within and outwith the SDA. For example, Policy DC1 may be made

³⁶ Scottish Planning Policy paragraph 130

more permissive to very small scale new build solely affordable housing development in the countryside, such as to allow some very limited infill new build affordable housing on previously developed land where it is located within or immediately adjacent to an existing group of housing in the countryside. Replacement dwellings may also be considered. However, the approach to the principle of such new build proposals within the green belt or within any designated Countryside Around Town area should continue to be one of resistance.

5.90 Policies managing development in the countryside need to acknowledge the wide range of development and activities that should and should not take place there. They must balance the competing demands for development by promoting and supporting appropriate development, whilst guarding against inappropriate development and helping direct it to more suitable locations. The character and appearance of the countryside is also to be maintained and enhanced.

Development on the Coast

5.91 In terms of development on the coast, SPP notes that development plans should identify coastal areas that are largely developed and that may be suitable for further development, areas subject to significant constraints, and areas considered unsuitable for development which are largely unspoiled and that are generally unsuitable for development. There should be a presumption against development on areas of unspoiled coast. Such unspoiled locations may include the Forth Islands and Bass Rock.

Table 12: Development in the Countryside and on the Coast

Preferred Approach	Maintain current policy approach to development in the countryside and define coastal areas with significant constraints and largely unspoiled: Generally maintain the current policy approach. However, the LDP proposals map should define significantly constrained coastal areas and those parts of the coast which are unspoiled. A presumption against development on the unspoiled coast would be introduced. A reference will be made to the need to minimise the loss of rare or carbon rich soils. Clarification that occupancy restrictions would normally dealt with by planning condition would also be introduced.
Reasonable Alternative	As the preferred approach, but in very limited circumstances be less restrictive to very small scale housing proposals in the countryside: Generally maintain the current policy approach, but review Policy DC1 to include the following exceptions: <ul style="list-style-type: none"> a. the like for like replacement of a dwelling recently rendered uninhabitable by unforeseeable circumstances, such as demonstrable accidental fire, may be permitted if there is compelling evidence that the loss of the original habitable

dwelling was recent and that it benefited from lawful use as a dwelling immediately prior to the loss;

- b. very small scale solely affordable housing proposals in the countryside may be permitted if they would be a logical addition to an existing small scale and more remote rural settlement of East Lothian identified by the LDP or group of existing dwellings in the countryside, if no alternative and more appropriate development opportunity exists within the settlement / area, such as the reuse or redevelopment of land and /or buildings. Limitations would be placed on the number and scale of dwellings that may be supported during the plan period relative to the scale of existing settlements and character of the local area.

Detailed policy criteria would be introduced either as a part of Policy DC1 or as new policy. However, the approach to the principle of new build proposals within the Green Belt or within any designated Countryside Around Town areas would be one of resistance.

Question 10: Development in the Countryside and on the Coast

In terms of the approach to managing development in the East Lothian countryside and on the coast, do you support the preferred approach, the reasonable alternative, or neither?

If you support the alternative approach do you think a) or b), or a) and b) should be incorporated in to policy?

If you support neither of the above options, what alternatives do you suggest?

Please explain your answer.

6 Implementation by Cluster Area

- 6.1 This section describes potential sites, at this stage, for implementing the preferred 'compact' spatial strategy to deliver future strategic development requirements in East Lothian through time. The preferred development sites are identified together with the likely enabling and supporting infrastructure requirements where known at this stage, together with estimates of reasonable lead-in and delivery timescales. Similarly, alternative sites under the alternative 'dispersed' spatial strategy are also highlighted.
- 6.2 The preferred and alternative sites set out in this MIR are based on the site submissions received during an early 'call for sites' exercise; however, some of the sites suggested to the Council also appear as Other Site Options. The Other Site Options are sites or locations which at this stage are not considered to be reasonable alternatives, or are locations / sites for which the Council has received no submission during the call for sites exercise but would nevertheless consult on as potential development locations.
- 6.3 The preferred 'compact' spatial strategy has its focus in the west of East Lothian: consequently, the analysis of potential development sites and environmental and infrastructure opportunities and constraints are described from west to east across the area. This analysis has been done by cluster area because certain infrastructure and services are delivered in East Lothian on this cluster / catchment basis.
- 6.4 Blindwells new settlement, being potentially a short, medium as well as long term development opportunity is discussed separately.
- 6.5 In summary, the preferred 'compact' spatial strategy approach is as follows:
- Focus where appropriate the search for new housing and economic development land on the main settlements within the west of the SDA, closest to the origin of demand adjacent to the city, and then consider those main settlements further east. Development land may also be identified at settlements outwith the SDA if required;
 - Promote a new town centre, or higher order town centre, at Blindwells, and retain existing town centres including at Musselburgh, Haddington, Dunbar and North Berwick, and promote local centres at Wallyford and Blindwells and potentially in other locations if appropriate. Protect other mixed use areas in the smaller settlements;

- Review the employment land supply and seek a mix of uses to enable delivery of employment land where possible and appropriate;
- Plan to meet housing requirements by a) firstly, complementing the existing strategy by intensifying or expanding existing allocations where possible and appropriate, b) identify appropriate new sites of different types and sizes to help meet requirements, c) define an area of search within which Blindwells may expand and d) safeguard appropriate land for potential longer term development opportunities;
- Release land from the Green Belt if this would a) allow development of effective sites that would be more suitable than those outwith the Green Belt b) lead to coalescence of settlements, **if** the accessibility advantages or the regeneration potential of the site in question outweigh those of other sites and the resultant loss of settlement identity and c) if new long term and defensible Green Belt boundaries can be defined;
- Introduce Countryside Around Town designations where the setting and identity of settlements or landscape features not in or adjacent to the Green Belt merit protection from built development;
- Provide protection to existing features that contribute to CSGN objectives, and seek to protect and further the extension of these features and, wherever possible, make connections between them, including in the development of sites;
- Within the countryside and on the coast, continue to support appropriate leisure, tourism and economic development opportunities of an appropriate scale and character (including energy and infrastructure related developments where appropriate) while restricting new housing development to very specific circumstances with a particular focus on the reuse of appropriate existing traditional buildings.

6.6 The following section discusses for each cluster area the environmental opportunities and constraints, the preferred development sites and their reasonable alternatives and the potential infrastructure and other mitigation requirements where known at this stage. **Those parties promoting potential development sites must prove the effectiveness of their sites in discussion with the Council and to its satisfaction before any site may be included in the Proposed LDP. In addition, the Proposed LDP must take in to account the resources available to implement the plan as well as an analysis of environmental and infrastructure opportunities and constraints. As such the consultation responses to the MIR will be key to concluding this assessment and thus how and where new development may be accommodated in the area.**

EXISTING CLUSTER AREAS

The Musselburgh Cluster

6.7 All the settlements within Musselburgh Grammar's catchment area fall within the East Lothian Strategic Development Area and, in particular, its western part. Consequently, in terms of the preferred strategy, at this stage this area may be considered as a focus in the search for additional strategic land allocations to contribute to the SDP's development requirements.

Green Belt

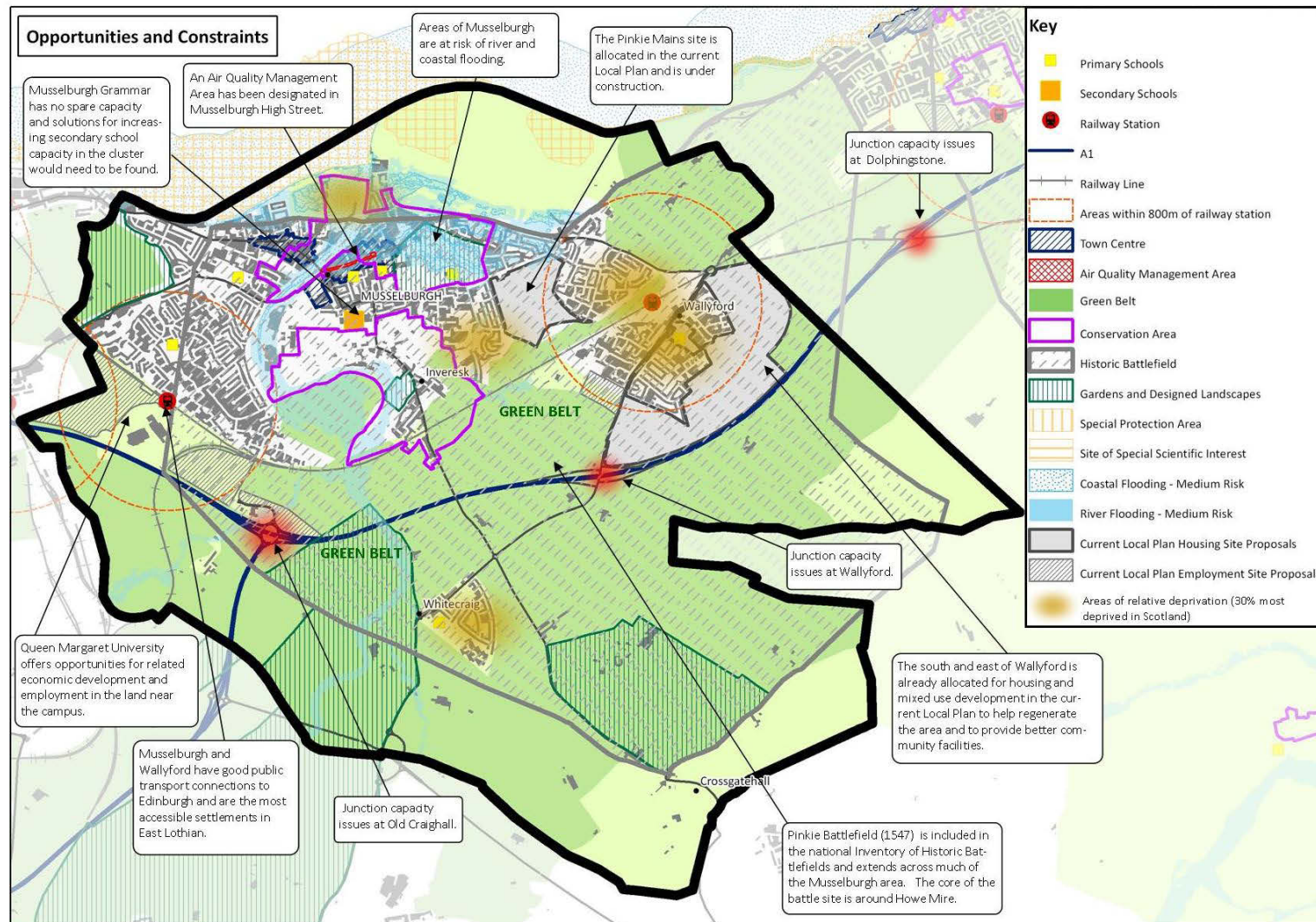
6.8 Any significant development land releases in this area will require changes to the Green Belt boundaries here. Considerations relevant to releasing land from the Green Belt are where it makes a lesser contribution to Green Belt objectives and/or where it is accessible by a variety of transport modes, particularly public transport, and / or if by directing development to such locations regeneration opportunities will be realised. However, settlement coalescence and the resultant loss of settlement identity are also important issues that require careful consideration in this area.

6.9 Those locations within the Green Belt which make a lesser contribution to Green Belt objectives³⁷, or which have a high degree of accessibility, or that provide potential regeneration opportunities are:

- the land bounded by Newcraighall, Millerhill, the A720 City Bypass and the Old Craighall Junction;
- land to the east of Wallyford, at Goshen and at Levenhall;
- land south of Whitecraig.

6.10 The remaining areas of Green Belt, which should be vigorously defended, include the land to the east of the A720 and south of the A1 and land to the north of the A1, including that which provides for the setting of the well-defined, established and visible southern edges of Musselburgh and Inveresk. In addition, land around Edenhall and east towards Pinkie Braes provides a setting for and separation between the latter and Wallyford as well as views to prominent regional landmarks. Land to the west of Wallyford also contributes to the setting of settlements in this area and also forms the core of the Battle of Pinkie site. Notwithstanding the other merits of the land at Goshen set out above, the land between Musselburgh and Prestonpans contributes to retaining a setting and separation between these settlements.

³⁷ Edinburgh Green Belt Study 2008, Land Use Consultants for City of Edinburgh, East Lothian, Midlothian, West Lothian and Scottish Borders Councils and Scottish Natural Heritage

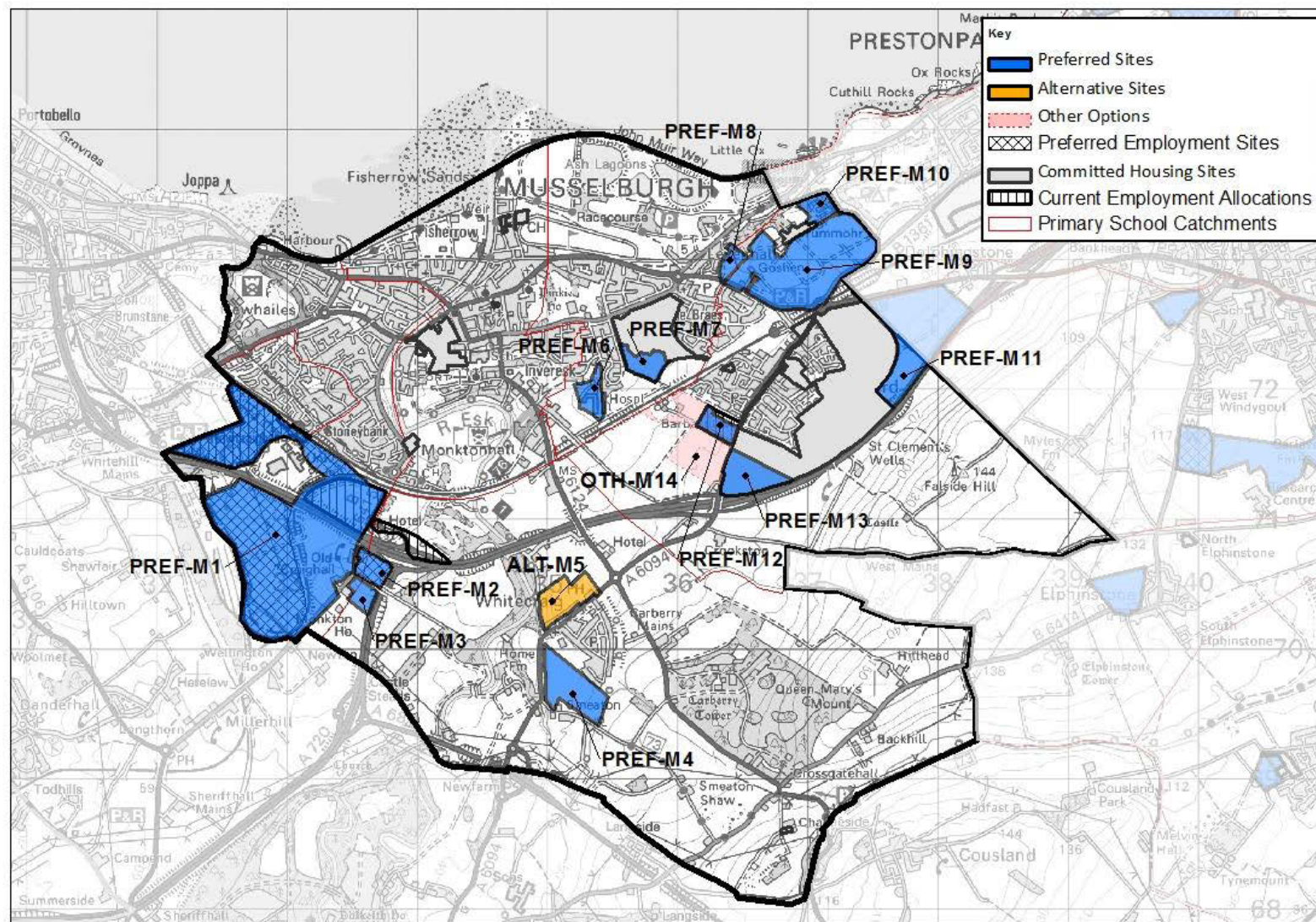


Preferred Economic Development Opportunities (subject to infrastructure provision and mitigation)

6.11 The preferred strategy supports the retention of existing operational employment areas as well as the employment allocations of the current local plan. Notwithstanding this, the following new employment opportunities are preferred at this stage:

- New business land (5ha) could be promoted to the south west of Old Craighall junction between the A720 and Old Craighall Road (**PREF-M2**);
- Land at Craighall, including existing employment allocations either side of QMU, could be promoted as part of a wider mixed-use development comprising land for economic development and housing (**PREF – M1**). The aim of this would be to enable the servicing / development of land allocated for employment using new housing to enable this, while providing homes nearby employment opportunities in an accessible location:
 - The existing 24ha allocated employment land between the QMU campus and Newcraighall should continue to be allocated for economic development or a mixed use, education and business-led hub. This would be to allow the adjacent university scope for expansion and to support the continued growth of the life sciences sector in this part of the city region. It would also service land for employment in an accessible location directly adjacent to a rail halt, the A1 and the intended terminus for Tram Line 3;
 - The remaining 15ha of allocated employment land south east of QMU between the freight rail line and the B6415 road to Old Craighall remains appropriate for employment use; however, as part of any wider mixed use proposal a residential development of circa 350 homes on this land may be supported if education capacity solutions can be found and noise (particularly from the elevated A1 Musselburgh Bypass and freight line) can be addressed in a way that does not require sub-optimal mitigation solutions, such as acoustic barriers along the A1 which restrict/eliminate open views to Musselburgh and Inveresk and to other landmarks on the approach to Edinburgh;
 - The 21ha of land on the north west side of Old Craighall between the village and the freight line/A1 is currently in the Edinburgh Green Belt. Yet as part of a wider mixed use proposal in the area, this land may accommodate circa 350 homes, subject to education solutions being found and resolution of the same noise mitigation issues highlighted above;
 - The 55 ha of land between Millerhill, the freight rail line and A1 is also currently within the Edinburgh Green Belt. Yet as part of a wider mixed use development the allocation of this land for economic development to replace that lost to housing to the north east could be supported;
 - Any housing allocations of this scale in this location would require education capacity solutions to be found.

This approach would require modification of Green Belt boundaries and recognises that this is also proposed by adjoining local authorities to accommodate strategic development. A new defensible and long term Green Belt boundary could be defined using the A720. A masterplan for the Craighall area would be required to demonstrate how development here would integrate with the surrounding area / developments.



Preferred Housing Opportunities (subject to infrastructure provision and mitigation)

6.12 The strategy continues to support the delivery of the existing housing land allocations of the current local plan including smaller scale housing commitments that form part of the established housing land supply. The sites in the table below are currently the preferred new housing opportunities in the Musselburgh Cluster. However, as mentioned above (paragraph 6.11) there are also a number of strategic developments proposed in adjoining local authority areas. There is some concern that the scale of the overall land release in the wider area would prevent all of the land being developed in the required timeframe, and that this may undermine the willingness / ability to deliver certain sites in East Lothian and / or elsewhere. Nonetheless, based on the compact spatial strategy and an analysis of opportunities the sites below are preferred at this stage.

Table 13: Musselburgh Cluster - Existing Housing Supply & Preferred New Housing Opportunities

Site Ref		2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
	Existing Supply	1,056	794	0	1850	1,850	
	Expand Existing Sites						
PREF – M7	Pinkie Mains	127	0	0	127		Land for circa 127 homes is within the existing Pinkie Mains allocation
PREF – M13	Wallyford	0	60	290	350		Land for circa 350 homes is within the existing Wallyford allocation
	New Allocations						
PREF-M1	Craighall	125	375	200	700		Land at Craighall is a preferred land release. A mixed use proposal could be promoted here to provide a comprehensive solution for the development of 700, potentially more, homes and up to 79 ha employment land, subject to the mitigation of any development related impacts including transportation and any air quality impacts on a cumulative basis as appropriate. The location is accessible and well served by public transport and there are opportunities that could improve this for the area. In regional terms, the location is one of the most accessible in East Lothian and its development would promote sustainable travel patterns and help minimise carbon emissions. The existing 24ha employment land on QMU's north-western edge should be retained for employment / institutional use and serviced using housing development on other sites at Craighall as an enabler for this. The 55ha of land which is crossed by overhead power lines to the east of the Millerhill Marshalling

Table 13: Musselburgh Cluster - Existing Housing Supply & Preferred New Housing Opportunities

Site Ref	2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
						<p>Yards and between the freight rail loop and A1 could be removed from the Green Belt and allocated for employment, with access taken from the A1 via a new junction with QMU. The land to the east of QMU and north of the A1 may be allocated for housing instead of employment; land to the south of the A1 at Old Craighall could be removed from the Green Belt and may be allocated for housing. Access to both of these potential housing sites should be possible from the local road network. Any housing development at Craighall should enable the servicing of employment land to the north-west of QMU as described above. However, currently there is insufficient education capacity for a housing proposal of this scale in the area. School catchment reviews could be considered to establish if a new primary school may be promoted to serve a new development here; the provision of secondary school capacity and any need for school catchment review would be subject to any secondary education solution for the Musselburgh cluster. Another potential approach may be to promote catchment reviews for the Craighall area in association with land at and around Shawfair in the Midlothian Council area. However, new secondary education facilities there may not be delivered in the short or medium term. This would delay the ability to develop housing at Craighall until the longer term when new education facilities may be delivered at Shawfair and associated catchment reviews could be concluded. This timescale may be reduced if new primary and secondary school facilities were provided earlier at Craighall, which may also serve the Shawfair area. Any development here would be subject to transport impacts and appropriate mitigation, with new links provided as appropriate. Noise impacts would require mitigation in a manner acceptable in landscape terms. Significant structural landscape planting to contribute to green network objectives as well as provision of a foot path and cycle path network to connect with the surroundings and between the sites would be required. A comprehensive masterplan would be necessary, including consideration of how development of this land could help enable other sites</p>

Table 13: Musselburgh Cluster - Existing Housing Supply & Preferred New Housing Opportunities

Site Ref		2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
							in the area which may come forward, potentially including those in the Midlothian Council area. For the avoidance of doubt this would include consideration of how this site may help make education capacity available to serve a wider area at primary as well as secondary level.
PREF-M9	Goshen	125	375	500	1000		Land at Goshen is a preferred land release, subject to the mitigation of any development related impacts including transportation and any air quality impacts on a cumulative basis as appropriate. It could be promoted for a mixed use development including approximately 1,000 homes. It could help support community regeneration. This would be subject to education capacity being made available including the provision of a new primary school at the site and the ability to provide secondary school capacity. To provide any new primary school at the site school catchment reviews would be required. Provision of secondary school capacity would be subject to any secondary education solution for the Musselburgh cluster and school catchment reviews may be required. Importantly, the Goshen site may offer a potential site for a new secondary school facility to serve the Musselburgh area. Another approach may be to promote school catchment reviews and to direct secondary pupils from the site (and potentially a wider area) to Preston Lodge High School with feeder primary school arrangements also modified accordingly – e.g. any new primary school at Goshen feeding Preston Lodge High School. In regional terms, the site is one of the most accessible in East Lothian, and its development would promote sustainable travel patterns and help minimise carbon emissions as well as help contribute to regeneration objectives. Access may be provided via the local road network, but as with other sites in the area cumulative impacts must be assessed and mitigation provided, including in relation to any air quality impacts. There would be impacts from the removal of the site from the Green Belt in terms of coalescence of settlements and settlement identity and setting, but these could in part be mitigated by structural planting as part of the Central Scotland Green Network and the selective positioning of open space within

Table 13: Musselburgh Cluster - Existing Housing Supply & Preferred New Housing Opportunities

Site Ref		2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
							the site. A comprehensive masterplan for the Goshen area would be required, including how any development here could be integrated with the surrounding area and consideration of how this land could help enable any other sites in the surrounding area which may come forward. For the avoidance of doubt this would include consideration of how this site may help make education capacity available to serve a wider area at primary as well as secondary level.
PREF-M8	Levenhall	75	0	0	75		Land at Levenhall is a preferred land release, subject to the mitigation of any development related impacts including transportation and any air quality impacts on a cumulative basis as appropriate. It could be promoted for circa 75 houses subject to the ability to provide education capacity and site access to the A199. It may be that education capacity could only be made available for this site in association with any primary education solution brought forward at Goshen and provision of secondary school capacity would be subject to any secondary education solution for the Musselburgh cluster. A masterplan would be required.
PREF-M6	Edenhall	100	0	0	100		NHS operations have now ceased at the former Edenhall Hospital site and it is brownfield land. As the site is now surplus to NHS requirements it could be promoted for approx 100 houses, subject to the mitigation of any development related impacts including transportation and any air quality impacts on a cumulative basis as appropriate as well as the ability to make education capacity available. Site access from local road network should be possible. It may be that education capacity could only be made available for this site in association with any primary school catchment review associated with any education solution brought forward at Goshen. The provision of secondary school capacity would be subject to any secondary education solution for the Musselburgh cluster. A masterplan would be required.
PREF-M10	Drummohr (Safeguard circa 100 Homes)	0	0	0	0		Drummohr Caravan Park is a preferred land safeguard. While the site is currently separate from Musselburgh and within the Green Belt, it would represent a logical extension to development at Goshen in the medium term

Table 13: Musselburgh Cluster - Existing Housing Supply & Preferred New Housing Opportunities

Site Ref		2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
							if that site came forward. The site at Drummohr could be a location for approx 100 homes, subject to the mitigation of any development related impacts including education, transportation and any air quality impacts on a cumulative basis as appropriate. It may be that primary education capacity could only be made available for this site in association with any education solution brought forward at Goshen. Provision of secondary school capacity would be subject to any secondary education solution for the Musselburgh cluster. The site is currently in use as a caravan park and there is no short term intention to cease this operation so the land could be safeguarded for a potential housing development. A masterplan would be required.
PREF-M11	Dolphingstone (Safeguard circa 400 Homes)	0	0	0	0		Land at Dolphingstone is a preferred land safeguard, subject to the mitigation of any development related impacts including transportation and any air quality impacts on a cumulative basis as appropriate. There may be an opportunity for Wallyford to expand further east beyond the area of the current allocation towards the Dolphingstone interchange, into land which is currently in the Green Belt. This land would have capacity for approximately 400 homes and other mixed land uses. An appropriate education solution for this area would be required. Most of the land is currently within Tranent's Sanderson's Wynd Primary School catchment area, but any future catchment review may include it within the catchment of the new Wallyford Primary School once the new school is in place. The provision of secondary school capacity would be subject to any secondary education solution for the Musselburgh cluster. The preference is that this land only be considered for development once the new primary school at Wallyford has been delivered and the land designated by the current local plan allocation is substantially built out with new distributor road through the site linking Salter's Road with the A199 complete as a minimum.
PREF-M3(a)	Old Craighall East	50	0	0	50		Land at Old Craighall East is a preferred land release, subject to the mitigation of any development related impacts including transportation and any air quality impacts on a cumulative basis as appropriate. Site access from the

Table 13: Musselburgh Cluster - Existing Housing Supply & Preferred New Housing Opportunities

Site Ref		2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
							local road network should be possible. In combination with Newton Farm (see PREF – M3b below) these sites could provide approximately 100 homes on the south side of Old Craighall Road, subject to education solutions for the wider area. A shared primary education solution for the wider area may be required, including the means of providing education capacity for this site with the other preferred sites at Craighall. This should be reflected in any comprehensive masterplan prepared for the other Craighall sites as appropriate. The provision of secondary school capacity would be subject to any secondary education solution for the Musselburgh cluster. There are significant cultural heritage assets to the south west of this land, including a scheduled monument, a listed building and a designed landscape. However, it may be that some land to the north east, beyond the category A-listed Monkton House and its setting, could be developed without harming cultural heritage assets. Any noise impacts from the adjacent roads would require mitigation in a manner acceptable in landscape terms. Significant landscape planting to contribute to Central Scotland Green Network objectives would be required. A co-ordinated joint masterplan would be required showing how this site would be integrated with its surroundings and the site PREF – M3b.
PREF-M3(b)	Newton Farm, (also Old Craighall East)	0	50	0	50		See PREF – M3(a) above (Old Craighall East).
PREF-M4	Whitecraig South	75	225	0	300		Land at Whitecraig South is a preferred land release, subject to the mitigation of any development related impacts including transportation and any air quality impacts on a cumulative basis as appropriate. It could be promoted for approximately 300 homes and other mixed land uses, subject to education capacity. Land to the south of the village is well-located to its primary school and offers scope to expand this facility (to accommodate any new housing development) and the adjacent open space. The provision of secondary school capacity would be subject to any secondary education solution for the Musselburgh cluster. Access from the local road network and

Table 13: Musselburgh Cluster - Existing Housing Supply & Preferred New Housing Opportunities

Site Ref		2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
							to the A68 or A1 may be achieved. A road link through the site to Whitecraig Avenue would also be required. New development here offers regeneration potential. New defensible green belt boundaries could be formed to the south west, whereas this would be difficult to the north of the settlement. A masterplan would be required.
PREF-M12	Barbachlaw	94	0	0	94		The 94 house planning consent at Barbachlaw, Wallyford should be reflected as a new housing land allocation to reflect a planning appeal decision. For the avoidance of doubt the completion of the stadium proposal continues to be supported.
	<i>Sub Total</i>	<i>771</i>	<i>1085</i>	<i>990</i>	<i>2846</i>	<i>2,846</i>	
	Totals	1,827	1,879	990	4,696	4,696	

Reasonable Alternative Sites & Other Site Options

6.13 At this stage the following sites may be reasonable alternative development opportunities or other site options.

Table 14: Musselburgh Cluster - Reasonable Alternative Sites & Other Site Options

Site Ref	Site Name	Comments
ALT-M5	Whitecraig North	This site to the north-west of Whitecraig may be a reasonable alternative development opportunity, subject to education capacity and the mitigation of any development related impacts including transportation and any air quality impacts on a cumulative basis as appropriate. However, this site is exposed in landscape terms and would not represent as logical an expansion of the settlement as the preferred site to the south. Securing appropriate Green Belt boundaries would also be challenging. Access may be provided to the local road network.
OTH-M14	Howe Mire	Land at Howe Mire, to the west of Wallyford, may be considered as another option for a mixed use housing and employment development, subject to education capacity and the mitigation of any development related impacts including transportation and any air quality impacts on a cumulative basis as appropriate. For the avoidance of doubt the completion of the stadium proposal continues to be supported. However, in relation to the land further west, it is in the core of the Pinkie battlefield site and thus would have more significant landscape and cultural heritage impacts than other sites. Additional primary school capacity would be required, and this could not be provided until a new primary school at Wallyford is delivered in the existing expansion area. Provision of access would also need to be resolved.

Infrastructure

Secondary education

- 6.14** Committed housing sites such as Pinkie Mains and Wallyford require an increase in secondary school capacity at Musselburgh Grammar beyond its current 1,350 pupil places. Any further significant housing development in the Musselburgh Grammar catchment area would require a substantial increase in secondary education capacity beyond that needed to accommodate the pupils currently anticipated from these committed sites.
- 6.15** Further on-site expansion at Musselburgh Grammar to accommodate pupils from committed housing sites is technically possible but this would bring significant challenges to achieving educational outcomes. Another approach to increasing secondary school capacity at Musselburgh Grammar beyond 1,350 pupils may be to split the school over two campuses to create a new purpose built Annex facility. An appropriate site for any Annex would need to be found. One site option in close proximity to the existing Musselburgh Grammar School campus is Council owned land at the former Brunton Wireworks site. However, this site would secure no more additional capacity than could be provided by expansion of the school on its existing site, and would present even greater challenges to achieving educational outcomes. Notwithstanding this, neither of the above options for the expansion of Musselburgh Grammar could provide sufficient secondary education capacity for the preferred strategy. Further options for making additional secondary education capacity available in the Musselburgh Cluster in support of all or some of the preferred sites in a manner that may help lead to improved educational outcomes may be:
- a. a new secondary school on a new campus to replace the existing Musselburgh Grammar school and which would serve all the Musselburgh cluster, including committed and preferred housing sites; or
 - b. a new upper secondary school facility that would provide purpose built accommodation for senior phase pupils on a new campus discrete from the existing Musselburgh Grammar campus while maintaining a single secondary school for the cluster; or
 - c. a second and entirely new secondary school in addition to the existing Musselburgh Grammar to serve part of the existing Musselburgh cluster;

In the case of a), b) and c), a suitable site for a new secondary school facility would need to be found and funding and delivery solutions would need to be confirmed and agreed before any of these options could be considered as part of any Proposed LDP strategy. Importantly, funding for any new facility would need to be secured from sources other than East Lothian Council. Developer contributions would have a significant role to play, and funding solutions are also being explored with the Scottish Government. **However, unless funding and delivery solutions are found, these are unlikely to be options given the resources available to implement the plan.** Any such solution would need to ensure early provision of a new secondary school facility to enable development of all sites in the cluster independently of one another. This would require an appropriate

mechanism to be identified (likely not a planning obligation) that would initially allow an appropriate and sufficient site to be transferred to the Council with the option to secure additional land in phases. Developer contributions would be sought towards campus land through time. If a new second secondary school were to be provided, school catchment reviews would be required and a location for it in the east of the cluster would be preferred. This would ensure suitable feeder primary school arrangements and complement regeneration objectives. The Council currently has no appropriate land in its control; or

- d. A further option could be to redefine cluster boundaries in west Musselburgh in association with a joint arrangement with Midlothian and/or City of Edinburgh Councils:

At this stage the City of Edinburgh Council has indicated that there is no scope for such a cross boundary arrangement. However, Midlothian Council has indicated that scope may exist for such a shared education solution in association with development at and around Shawfair. This approach would require school catchment reviews in both local authority areas. The timing for development at and around Shawfair and the provision of new education capacity, particularly secondary education capacity, would influence the timing for any development that may occur in west Musselburgh should it be dependent on education capacity being provided at Shawfair. At this stage a new secondary facility at Shawfair is not expected to be delivered until 2023 at the earliest; or

- e. A final option could be to redefine cluster boundaries in east Musselburgh to displace demand for education capacity to Preston Lodge High School:

Preston Lodge High School could accommodate additional secondary pupils from the Musselburgh Cluster, but this is a sub-optimal solution and is not preferred. It would require school catchment reviews. This solution would also have an impact on if / how education capacity may be provided for other sites in / around the current Preston Lodge catchment, including for Blindwells.

Primary education

- 6.16 There is limited available primary school capacity in the Musselburgh cluster. In the west of Musselburgh, there may be scope to make use of the very limited available education capacity at existing primary schools, potentially involving catchment reviews. Subject to secondary education solutions, this may allow a limited number of new homes at Craighall to come forward in the short term; however, if such potential exists it must be part of a wider comprehensive solution for the development of the entire area before it could be followed. The solution would need to ensure new housing and associated infrastructure, including new education facilities, would be brought forward and that it would enable the servicing of employment

land adjacent to the university.

- 6.17 Any medium / longer term comprehensive solution for Craighall would need to deliver and sustain a new primary school facility, likely requiring a minimum of circa 700 new homes, and primary school catchment review(s). The land surrounded by the freight rail line, the A1 and crossed by overhead pylons is not as well connected to its surroundings via roads and pedestrian and cycle routes as would be expected for a residential area and for education facilities, but would be suitable for employment use if direct access to the A1 were to be provided.
- 6.18 In east Musselburgh, Pinkie St Peter's Primary School is programmed to be expanded to accommodate the committed housing sites in its catchment, but may not be able to expand further beyond this to accommodate the preferred sites currently in its catchment area. However, there may be opportunities in association with any new primary school at Goshen to redefine catchment boundaries here and to make additional capacity available at Pinkie St Peter's Primary School to allow preferred sites to come forward.
- 6.19 The existing Wallyford Primary School has no available capacity; however, a new primary school is to be provided in association with the committed expansion of that settlement. The new Wallyford Primary School would require to be made capable of further expansion to accommodate the additional pupil places required in association with the increased housing numbers that may be directed to that site under the preferred strategy. Whitecraig Primary School could be expanded as part of the preferred approach to the expansion of that settlement.
- 6.20 **Any new housing land allocations in the Musselburgh cluster will be resisted unless solutions are found that will fund and deliver the necessary additional education capacity needed to support them in a manner acceptable to the Council. This will require innovative approaches to securing developer funding for the provision of increased education capacity and new education facilities.**

Transportation

- 6.21 Any significant new development in East Lothian that feeds traffic onto the A1 will impact upon the capacity of the road and its junctions. There are particular issues with the capacity of the Old Craighall Junction, particularly the length of slip lane queues, as well as all junctions west of Gladsmuir. This will be particularly so once the committed and additional development required in East Lothian is delivered. Transport Scotland is seeking a developer contribution mechanism to be put in place to provide the required funding to deliver its increased capacity.

6.22 The existing non-trunk road junction providing access to the QMU campus and adjacent employment land may be modified to provide on and off ramps in both directions in order to accommodate additional development in the area. This may also help to relieve some capacity issues at Old Craighall Junction in the short term. Mitigation is committed at the Wallyford A 1(T) and Dolphinstone A1 (T) interchanges in association with the Wallyford strategic allocation, but further work may be required to those interchanges to accommodate additional development in the area. The resultant increase in vehicle flows may also impact on noise mitigation requirements.

6.23 There are also concerns about the capacity of Musselburgh town centre to accommodate additional traffic beyond current commitments and the potential cumulative impact of additional development on this situation. However, it may be that if solutions are brought forward at Old Craighall that this may help redirect traffic from Musselburgh High Street. The existing air quality in Musselburgh town centre is a related concern and ELC Transportation is considering how the existing situation could be managed in association with an emerging development strategy. Any development will be subject to transport and associated air quality impacts and appropriate mitigation, based on an assessment of cumulative impact.

Water and Drainage

6.24 The implications of the preferred sites on this area can be accommodated by Scottish Water. It has indicated that capacity exists in its strategic assets to accommodate the preferred sites in the short term. It may be that investment is required in to the medium / longer term to accommodate the cumulative impact of these sites together with those in other local authority areas. Water and drainage impact assessments will be required to establish solutions in to the medium and longer term for strategic assets and for how connections to the local networks will be secured.

Mitigation

6.25 Mitigation requirements will include:

1. Establishing new, long term defensible Green Belt boundaries;
2. Delivery of the green network opportunities, including woodland planting, active travel routes and habitat networks;
3. Noise impacts and the visual impacts of mitigation requirements arising from increased vehicle flows, the rail network and noise from adjoining land uses will need to be taken into account;
4. Trunk and local road impacts, including at Old Craighall, arising as a result of the cumulative impact of development including that within East Lothian;

5. Traffic and parking management measures are being considered for Musselburgh town centre to ease vehicle flows and to assist in meeting air quality management objectives;
6. Detailed modelling of traffic and air quality impacts to establish if the preferred strategy can be supported in the Proposed LDP, including consideration of cumulative impacts;
7. Education capacity constraints would need to be overcome;
8. In to the medium / longer term additional strategic foul drainage capacity may be required;
9. Identification of any ground conditions constraints and methods of mitigation;
10. Comprehensive masterplans would be required.

Those parties promoting development sites in this area must work together and with the Council to demonstrate to its satisfaction that the above issues can be satisfactorily addressed and associated mitigation delivered so sites are / can be made effective before they may be included in a Proposed LDP. It is expected that developer contributions will have a significant role to play in securing mitigation as appropriate.

Other Proposals

- 6.26** Lagoon 6 at Levenhall is in the process of restoration and lagoon 8 has an agreed restoration plan and is also part of the SPA. As part of this restoration there may be opportunities to create conditions suitable for a higher quality wildlife habitat and the creation of a local nature reserve. The LDP should support such use and designation of this area should appropriate restoration proposals be completed. The plan at Appendix 4 illustrates the potential boundaries for such a designation.

Key Messages: Musselburgh Cluster

At this stage the preferred development opportunities in the Musselburgh cluster could deliver approximately **4,700 additional homes and 84 ha of additional employment land** over the period to 2024 and beyond. However, the cumulative impact of development on transportation, air quality and education provision are critical issues. These will be important factors in determining the scale and distribution of any additional development in the area. The cumulative impact of additional development on the transport network, including at Old Craighall, is an issue that requires to be resolved. Notwithstanding this, in regional terms the Musselburgh cluster is highly accessible, including by public transport. It is in high demand as a place to live and offers significant potential for job creation. Strategic water and drainage capacity is available to serve this scale of additional development. There are also regeneration opportunities in the cluster. Importantly, there is a significant opportunity to promote a scale of growth in the cluster, and to share this among its settlements, which would justify the provision of new primary school as well as new secondary school facilities. However, whilst there may be a range of options to increase education capacity here, deliverable solutions for the funding and delivery of additional education capacity, potentially including a need for additional campus land, when it would be required, will be essential to enable any further housing development in this area. **Clarity on funding and delivery mechanisms is essential to establish how much additional education capacity, if any, may be provided, what form this may take and, consequently, how much additional housing land, if any, may be supported in this cluster and where. Any new housing land allocations in the Musselburgh cluster will be resisted unless solutions are found that will fund and deliver the necessary additional education capacity needed to support them in a manner acceptable to the Council. This will require innovative approaches to securing developer funding for the provision of increased education capacity and new education facilities.** There would also be a need to consider the redefinition of school catchment boundaries in association with the provision of any new primary education facilities as well as potentially a need for the same and consideration of feeder primary school arrangements in relation to any new second secondary school in the area, or for any joint arrangement between adjoining local authorities, or in the review of cluster boundaries within East Lothian. Comprehensive masterplans would be required for developments in the area. Before committing to significant additional housing allocations that may increase traffic in Musselburgh town centre there must be a clear solution to mitigate cumulative impacts both in terms of through traffic and air quality. Intervention at Old Craighall Junction to avoid through traffic routing through the town may assist this. As a minimum micro simulation modelling will be required to help resolve this issue, and to test potential solutions. Proposals will be developed to address these issues, and developer contributions towards delivering these solutions are very likely to be required. **If none of the additional growth preferred for the Musselburgh cluster can be supported, or if only a proportion of it can, alternative land and infrastructure solutions will need to be found so it can be delivered further east in East Lothian.**

Question 11: Musselburgh Cluster

Do you support the preferred approach to new economic development and housing opportunities in the Musselburgh cluster?

Taking in to account the prospect of other strategic development opportunities in adjoining local authority areas, do you think that all of the preferred housing sites in this cluster could be delivered in the anticipated timeframe? Please explain your answer.

Potential options have been identified for how education capacity might be increased in the cluster. How do you think those options could be funded and delivered?

Where might any new education facilities be located if required?

Please indicate if you support or oppose particular preferred sites, reasonable alternative sites, or other site options, and explain why?

If you do not support the preferred sites, please indicate what alternative sites you would suggest?

Do you have any other comments on the Musselburgh cluster area?

The Prestonpans/Port Seton/Cockenzie/Longniddry Cluster

6.27 All the settlements in Preston Lodge High School's catchment area fall within the East Lothian Strategic Development Area (SDA) and, in particular, its western part. Consequently, at this stage this area may be considered as an area of search for additional strategic sites to contribute to SESplan's requirements.

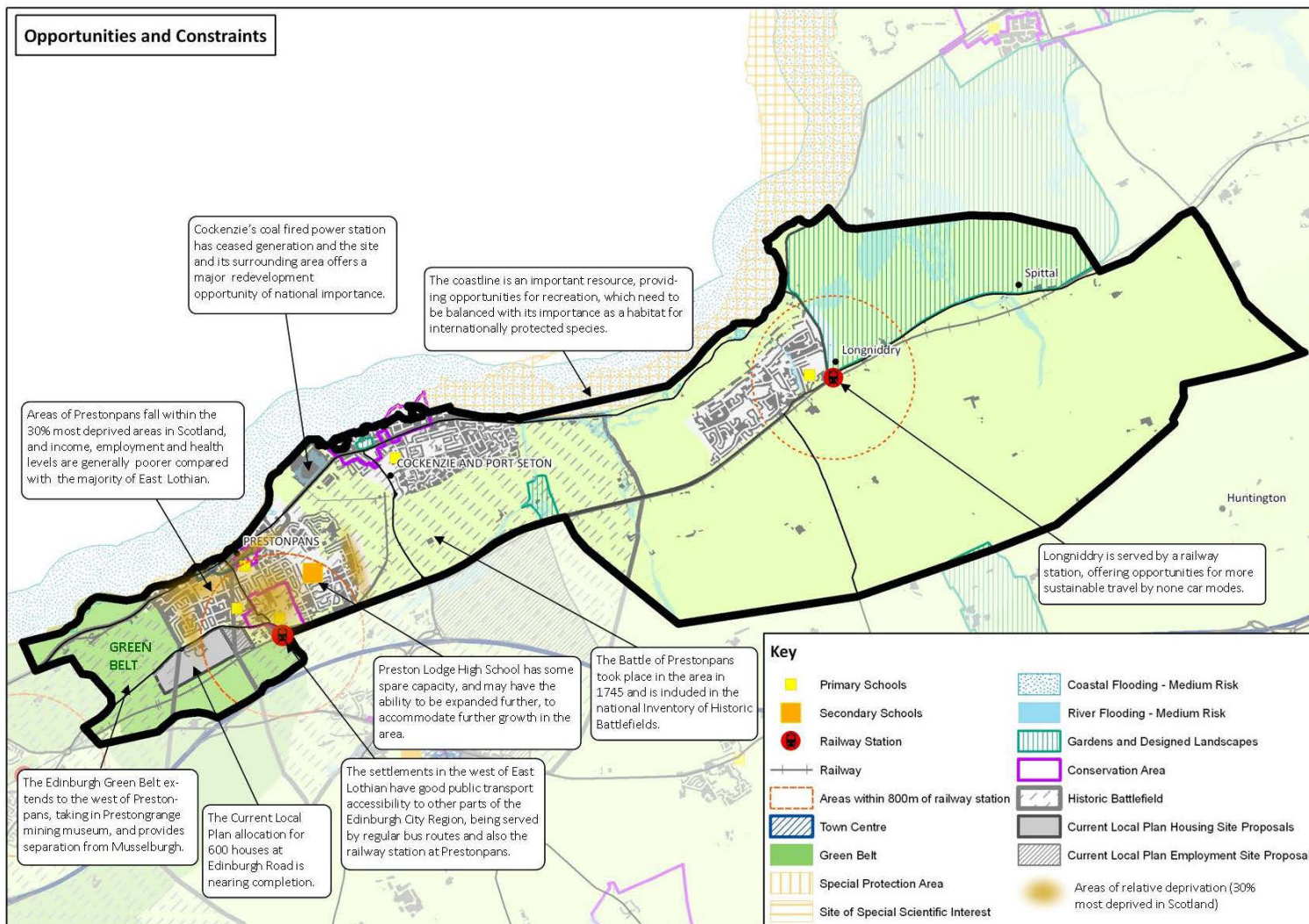
Green Belt & Countryside Around Towns

6.28 The Green Belt extends to the west and south of Prestonpans, between it and Musselburgh and to the crest of the Tranent Ridge and to Bankton House and Johnnie Cope's Road. The areas of Green Belt land within this cluster around Prestonpans are important in maintaining Green Belt objectives and should be vigorously defended.

6.29 There are also areas of land in this cluster that are outwith the Green Belt and which are under development pressure. These are between Prestonpans, Cockenzie, and the allocated land at Blindwells and Tranent. These locations should not be preferred or alternative development opportunities because they would lead to the coalescence of settlements, undermine the character of settlements, compromise cultural heritage assets and / or lead to the loss of the best quality prime agricultural land.

6.30 The combination of these environmental constraints and the desire to retain the separate identity of settlements and their character and setting points to a need to restrain further built development here which, individually or cumulatively, would undermine these objectives. To help retain the separate identity of these settlements the extension of the Green Belt, or another policy approach such as a Countryside Around Town designation, is being considered in certain locations.

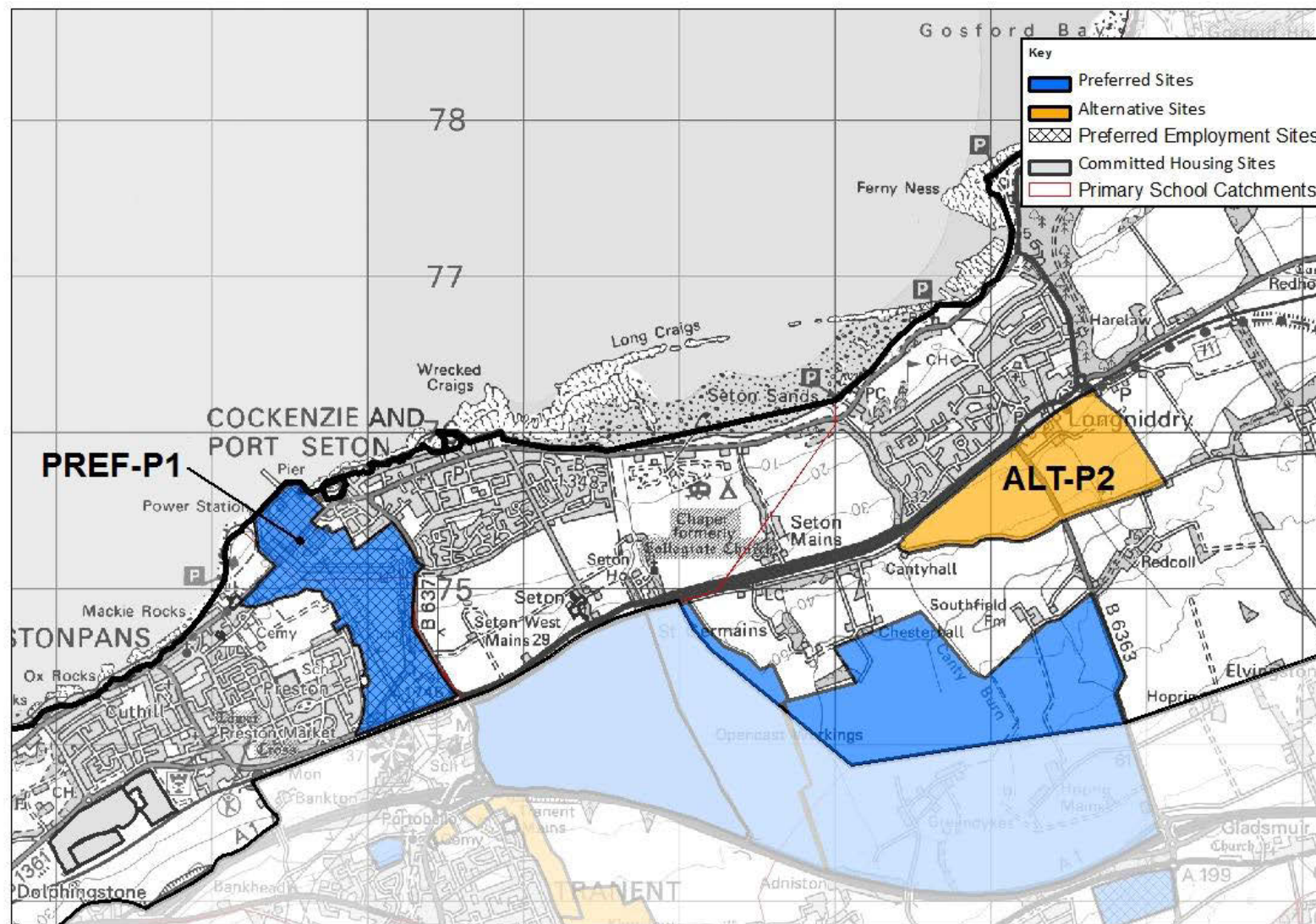
6.31 However, some sites do present nationally important economic development opportunities, which if realised could bring significant economic benefits for these communities, and which Scottish Ministers expect to be reflected in the Local Development Plan.



Preferred Economic Development Opportunities (subject to infrastructure provision and mitigation)

6.32 The preferred strategy supports the retention of existing operational employment areas as well as the employment allocations / land including at Mid Road Prestonpans set out in the current local plan. In addition, the following employment opportunity is also preferred:

- NPF3 supports and provides national development status to the planning permission approved under Section 36 of the Electricity Act to repower Cockenzie Power Station to a gas fired power station and for the associated gas pipeline; carbon capture and storage facilities are also supported here. NPF3 also signposts opportunities for renewable energy related investment at Cockenzie (the 10ha employment land currently allocated at the nearby Blindwells site may be a related opportunity) and notes the importance of the coast between it and Torness for a potential energy hub. NPF3 notes that there is potential for grid connections to potential off shore wind projects as well as converter stations. Developers are to work together and share infrastructure where possible. An application for planning permission in principle has recently been approved for a grid connection and convertor station nearby Cockenzie Power Station's former coal handling plant. NPF3 also notes that there may be potential for deep water harbouring facilities and port related activity at Cockenzie in support energy related development. If there is insufficient land at Cockenzie to accommodate competing proposals, priority will be given to those which make best use of the area's assets and secures the greatest economic benefits. As such, land at and around Cockenzie Power Station and its former coal handling yard should be identified for employment, energy and potential port related development (approximately 80 ha) consistent with NPF3 (**PREF - P1**). The intention would also be to ensure that, in to the longer term, provision is made for decommissioning and restoration plans. Importantly, NPF3s Action Programme notes that there is support a co-ordinated approach to planning for energy-related and other key development at Cockenzie. A comprehensive masterplan would be required. The intention is to reflect this in the LDP and its Action Programme, and to review existing local plan policies and proposals as appropriate.



Preferred Housing Opportunities

6.33 The strategy supports the delivery of existing strategic housing land allocations as well as the other smaller scale housing commitments that form part of the established housing land supply.

Table 15: Prestonpans Cluster - Existing Housing Supply & Preferred New Housing Opportunities						
Site Ref	2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
Existing Supply	134	20	0	154	154	
Expand Existing Sites						
None	0	0	0	0		
New Allocations						
None	0	0	0	0		
<i>Sub Total</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
Totals	134	20	0	154	154	

Reasonable Alternative Site

6.34 At this stage the following site may be reasonable alternative development opportunity.

Table 16: Prestonpans Cluster - Reasonable Alternative Sites & Other Site Options		
Site Ref	Site Name	Comments
ALT-P2	Longniddry South	<p>A southern expansion of Longniddry may be a reasonable alternative development opportunity. There may be potential to identify land capable of accommodating circa 1,000 homes as well as other mixed land uses here. However, it is not clear if an expansion of Longniddry could be achieved without compromising any ability to expand Blindwells. This is particularly so in relation to the capacity of the Gladsmuir A1 (T) Interchange. The land at Longniddry has good accessibility by rail but poorer accessibility by bus, particularly given the low bridge under the East Coast Main Line. A southern expansion of Longniddry would significantly change the character and appearance of this settlement, though it may not lead to the coalescence of settlements. If this site were to be supported there would need to be a clear demonstration that the East Coast Main Line would not act as a barrier to community integration. Currently, given the nature of the limited and constrained crossing points of the rail line available, this is in some doubt, particularly in relation to bus based public transport. There would also be a need to consider the expansion of the station car park, and how routes to access the rail halt from the south could be provided through any expansion area. Improvement to the B6363 would also be required. There would be a need for increased primary education capacity, either through provision of a new primary school at the site with associated catchment review, or by increasing the capacity of Longniddry Primary with a new lower or upper primary facility provided at a separate campus within any expansion area. Secondary education capacity may be provided at Preston Lodge High School, but Blindwells should have priority for this. A comprehensive masterplan demonstrating how new development to the south of the railway line may be integrated with the wider landscape and the existing community to the north, including provision of cycle and pedestrian links, would be required. There would also be a need to ensure delivery of strategic Central Scotland Green Network objectives, including how these would help secure a setting between any expansion of Longniddry and any expansion of Blindwells. Any development would be subject to transport impacts and appropriate mitigation.</p>

Infrastructure

Secondary education

6.35 Preston Lodge High School has existing capacity and the potential to accommodate some further expansion. This could be used to facilitate development of the following sites, subject to catchment reviews where necessary:

- Blindwells is an integral part of the SDP strategy, and an existing committed allocation. It should be given priority for infrastructure provision. The current education catchment and strategy for Blindwells may be reviewed such that, at least in the early years of development, primary pupils from the new settlement could attend Cockenzie Primary School and secondary pupils could attend Preston Lodge. This would allow viable pupil rolls to develop for new facilities to be provided on the Blindwells site; or
- If a Musselburgh based education solution is not found for the Goshen site, it may be included within Preston Lodge High's catchment, subject to a review of cluster and catchment boundaries by the Council; or
- Land at Longniddry may also be accommodated at Preston Lodge should the development of that site be supported.

However, the cumulative impact of any combination of these sites on Preston Lodge High School could not be accommodated by the school, even if it were expanded.

Primary education

6.36 Only Cockenzie Primary School has moderate available capacity and potential capacity for expansion. This may be used to accommodate the early phases of development at Blindwells in a similar way as explained above in relation to secondary school capacity.

6.37 If the expansion of Longniddry were to be supported it would require additional primary school capacity as the existing primary school has little or no capacity for expansion. A new school south of the ECML would do little for community integration. A split school, with the p1-3 and p4-7 delivered on separate sites on either side of the ECML (one being the existing school) would be better for community integration. This does, however, raise issues of increased travel by car between the two campuses, putting particular pressure on the existing narrow railway underbridge. This would be undesirable in transport terms and a potential road safety risk.

Transportation

6.38 Further development in this area will generate impacts on the key links to the trunk road at the Dolphingstone and Bankton Interchanges and is likely to require improvements to these interchanges and at the roads leading to them, as well as provision of opportunities for improved public transport. Associated interventions area likely to include:

- Mitigation of impacts at Old Craighall Junction and improvements to Bankton and Dolphingstone A1(T) Interchanges;
- Provision / safeguarding land for a new rail halt at Blindwells;
- Meadowmill junction (A198 / B1361/ B6371) to Bankton Interchange – potential widening of rail bridge and roundabout improvements;
- Potential for new road connecting the B1348 and B1361 over land at and around Cockenzie Power Station and its former coal handling yard;

6.39 If any development south of the ECML at Longniddry were supported, it would need to link to the railway station and improve accessibility to the southern platforms through the development area. An expansion of the Longniddry station car park would also be necessary. A key strategy would be to encourage car users to access the A1 at the Gladsmuir rather than Bankton Interchange: this would require an upgrade of the B6363 and potentially improvements to the Gladsmuir A1 (T) Interchange. Bus services may be restricted due to the low ECML bridge with clearance for only single deck busses possible. The carriageway under the rail bridge is also narrow but may be able to accommodate a footway to facilitate pedestrian movement between the two sides: if this were to be supported the junction would need to be signalised to control one way movement per phase to create the pedestrian link. There is also another underpass to the east which may offer a potential for pedestrian and cyclist movements. An appropriate safe crossing point on the A198 would need to be established.

Water and Drainage

6.40 The implications of the preferred sites on this area can be accommodated by Scottish Water. It has indicated that capacity exists in its strategic assets to accommodate the preferred sites in the short term. It may be that investment is required in to the medium / longer term to accommodate the cumulative impact of these sites together with those in other local authority areas. Water and drainage impact assessments will be required to establish solutions in to the medium and longer term for strategic assets and for how connections to the local networks will be secured.

Mitigation

6.41 Mitigation requirements will include:

1. Delivery of the green network, including woodland planting, active travel routes and habitat networks and securing an attractive setting for settlements as appropriate;
2. Trunk and local road impacts, including at Old Craighall, arising as a result of the cumulative impact of development including that within East Lothian;
3. Detailed modelling of traffic and air quality impacts to establish if the preferred strategy can be supported in the Proposed LDP, including consideration of cumulative impacts;
4. Traffic and parking management could be considered as measures to ease vehicle flows;
5. Noise impacts and the visual impacts of mitigation requirements arising from increased vehicle flows, the rail network and noise from adjoining land uses will need to be taken into account;
6. Education capacity constraints would need to be overcome;
7. In to the medium / longer term additional strategic foul drainage capacity may be required;
8. Identification of any ground conditions constraints and methods of mitigation;
9. Comprehensive masterplans would be required.

Those parties promoting development sites in this area must work together and with the Council to demonstrate to its satisfaction that the above issues can be satisfactorily addressed and associated mitigation delivered so sites are / can be made effective before they may be included in a Proposed LDP. It is expected that developer contributions will have a significant role to play in securing mitigation as appropriate.

Key Messages: Prestonpans/Cockenzie/Port Seton/Longniddry Cluster

At this stage the preferred development opportunities in the Prestonpans cluster could deliver approximately **154 homes and 80 ha of additional employment land** over the period to 2024. **However, this cluster may also have an important enabling role in providing education capacity for the current 1,600 houses at the Blindwells allocation as well as potentially for any expansion of the new settlement.** In regional terms the Prestonpans cluster is highly accessible, including by public transport. The cumulative impact of additional development on the transport network, including at Old Craighall, is an issue that requires to be resolved. The cluster is in high demand as a place to live and offers the potential for job creation. Strategic water and drainage capacity is available to serve additional development. There are regeneration opportunities, but relevant settlements are constrained from further expansion by environmental and infrastructure constraints, including the Green Belt, as well as the coastline and East Coast Main Line. To facilitate a National Development set out by NPF3 at Prestonpans / Cockenzie around 80ha of land should be promoted for major employment use, based upon energy related development which may extend to associated port-related activity. Consistent with NPF3 an appropriate area of land should be allocated for this purpose by the LDP. A comprehensive masterplan for the area would be required, including measures to mitigate development related impacts such as transport. For housing development, capacity at Preston Lodge High School could be used and / or the school could be expanded to make some additional education capacity available and how this capacity may be utilised is a significant issue: it could be used in the short term or for the longer term to serve the existing Blindwells allocation and any potential expansion of the new settlement, subject to catchment review. As an alternative, if Goshen were to be supported but a Musselburgh based education solution for that site were not to be found education capacity for its pupils may be provided at Preston Lodge High School, subject to catchment review by the Council. It is unlikely that enough capacity could be provided at Preston Lodge High School to accommodate pupils from Blindwells as well as the Goshen and / or Longniddry sites together. While an expansion of Longniddry may deliver circa 1,000 homes, it is not clear if this could be achieved without compromising the existing Blindwells allocation or undermine any ability to expand the new settlement further - e.g. in terms of education capacity and / or capacity at the Gladsmuir A1(T) Interchange. Notwithstanding this, it would be challenging to secure an appropriate expansion of Longniddry given the difficulties the East Coast Main Line would present to the integration of new development with the existing village. An expansion of Longniddry is not preferred at this stage, but it may be a reasonable alternative opportunity.

Question 12: Prestonpans/Cockenzie/Port Seton/Longniddry Cluster

Do you support the preferred approach to new economic development and housing opportunities in the Prestonpans/Cockenzie/Port Seton/Longniddry cluster?

Please indicate if you support or oppose particular preferred sites, reasonable alternative sites, or other site options, and explain why?

Potential options have been identified for how education capacity might be increased in the cluster. How do you think those options could be funded and delivered?

Where might any new education facilities be located if required?

If you do not support the preferred sites, please indicate what alternative sites you would suggest?

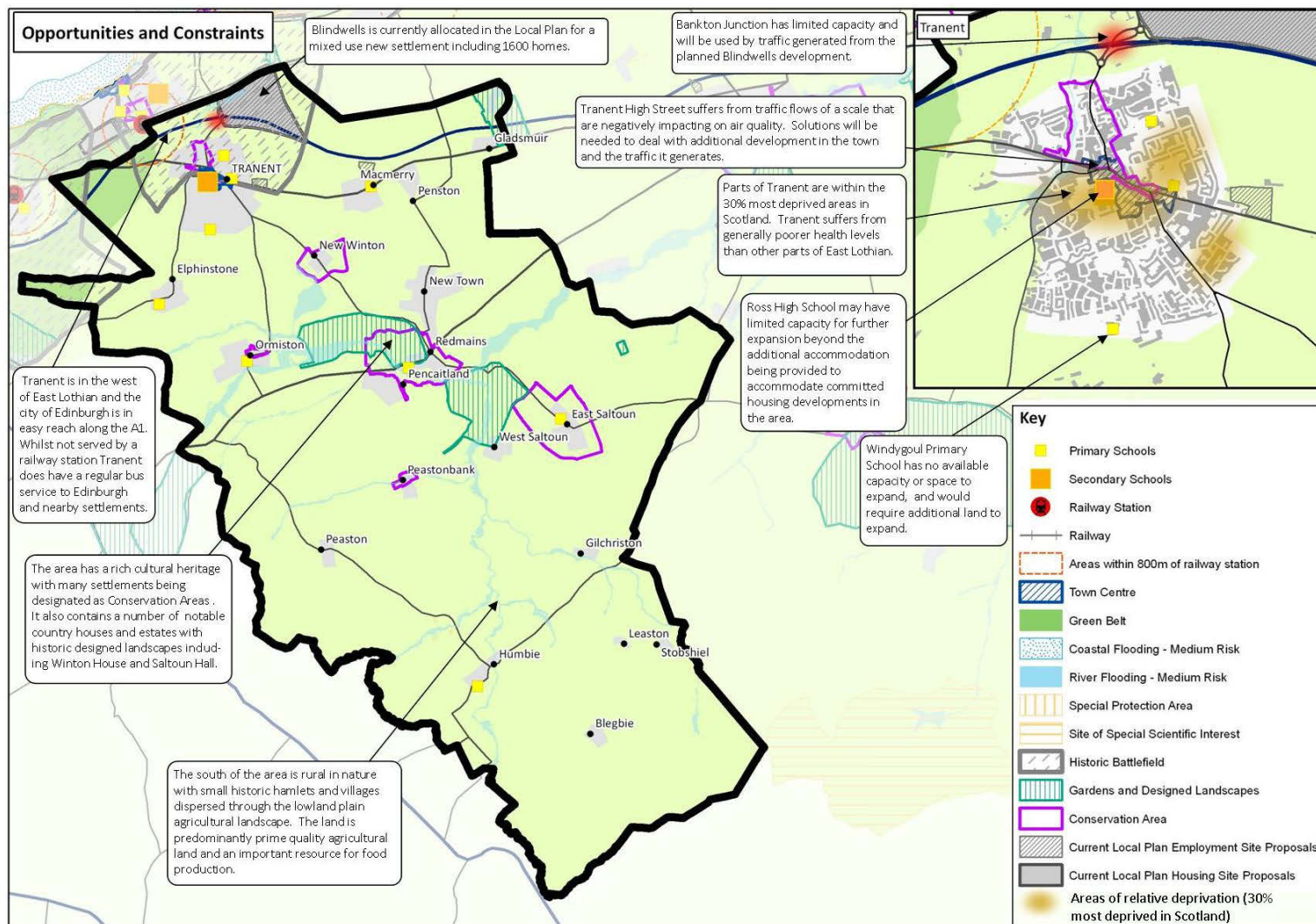
Do you have any other comments on the Prestonpans/Cockenzie/Port Seton/Longniddry cluster area?

The Tranent Cluster

- 6.42** Tranent, Macmerry and Gladsmuir are those settlements within Ross High's catchment area that fall within the western part of East Lothian Strategic Development Area (SDA). Consequently, at this stage they can be considered as an area of search for additional strategic sites to contribute to SESplan's Strategic Development Plan requirements.
- 6.43** The remaining settlements of Ormiston, Elphinstone, Pencaitland, New Winton, East and West Saltoun and Humble are all within the Tranent Cluster but lie outside the SDA. Consequently, they should not be a focus for additional strategic land allocations. However, sites outwith the SDA may be considered to help meet the East Lothian housing land requirement and to help provide a range of sites of different types and sizes in different locations in order to maintain a five year effective housing land supply at all times. In such circumstances, such housing sites may be identified if they are appropriate ones and if they would help to maintain a five year housing land supply, consistent with SDP Policy 7.

Green Belt & Countryside Around Towns

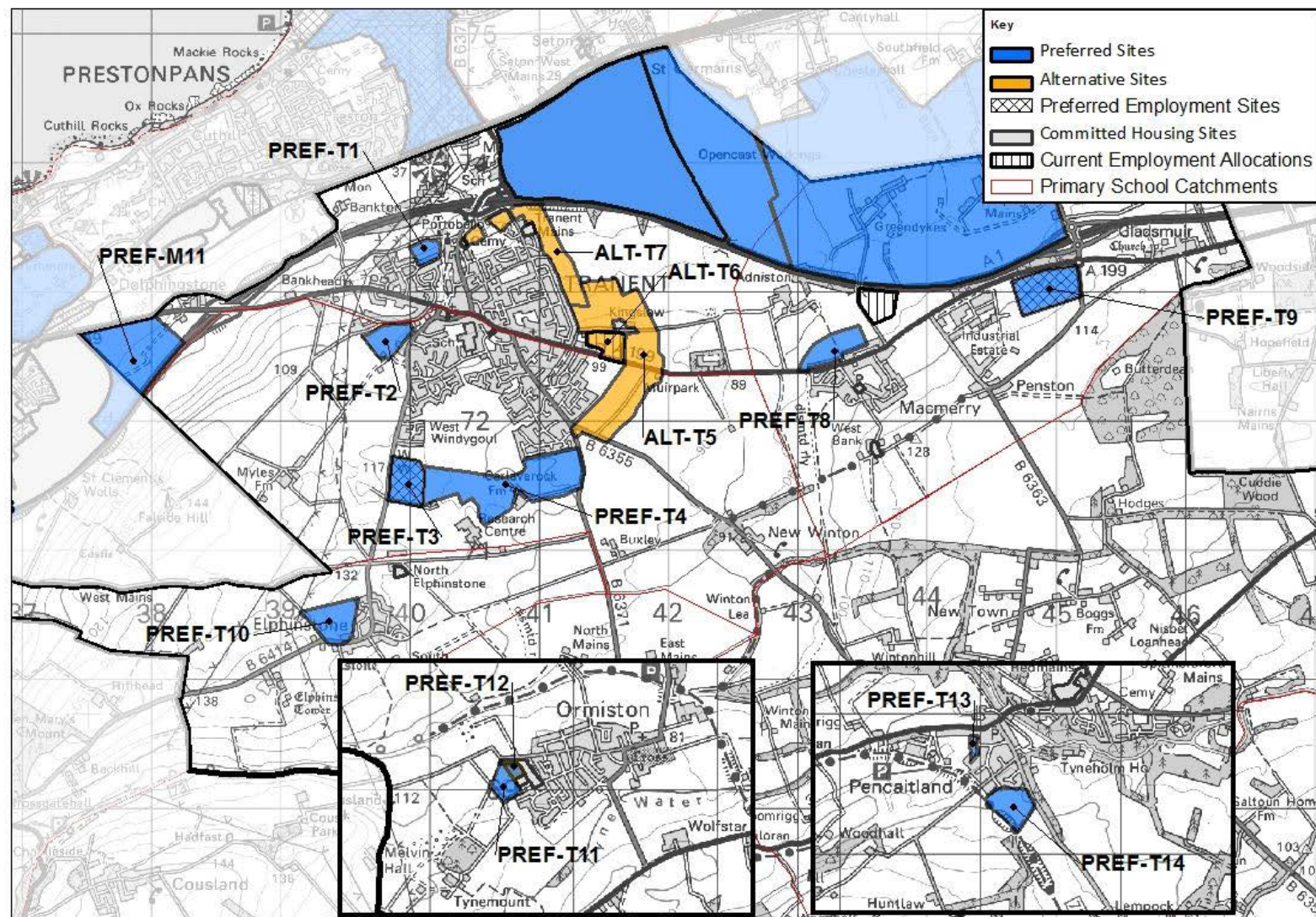
- 6.44** The Green Belt extends to the western fringes of Tranent. Open land to the north of the settlement is outwith the Green Belt but it does provide a setting to the town. Since it is undeveloped it also offers views to nearby settlement and the city and regional landmark features, such as Arthur's Seat and the Firth of Forth. There may be a case to extend the Green Belt to include this land; alternatively, a Countryside Around Town designation may be applied here instead.
- 6.45** The aim of this would be to complement the objectives discussed above for the Prestonpans/Port Seton/Cockenzie/Longniddry cluster for the land between Tranent, the coastal settlements and the Blindwells site. The village of Ormiston has its own unique historic character and landscape setting that also merits consideration for Countryside Around Towns designation for the most sensitive parts of its landscape setting.



Preferred Economic Development Opportunities (subject to infrastructure provision and mitigation)

6.46 The preferred strategy supports the retention of existing operational employment areas as well as the employment allocation of the current local plan at Kingslaw, Tranent. In addition, the following employment opportunities are also preferred at this stage:

- Approximately 15 hectares of land for general industry/business could be promoted on the east side of Macmerry Industrial Estate to provide for an expansion of it adjacent to the Gladsmuir Junction, subject to confirmation of ground conditions, access and suitable landscaping (**PREF - T9**);
- Approximately 9 hectares of land for general industry/business use could be promoted on land to the south west of Windygoul (**PREF - T3**). Provision should be made for pedestrian, cyclist and vehicular connections between this land and the adjacent land preferred for housing development to the east, and for complementary structural landscaping. A joint masterplan with housing opportunity (**PREF – T4**) would be required.



Potential housing opportunities (subject to infrastructure provision and mitigation)

6.47 The strategy supports the delivery of existing strategic housing land allocations as well as the other smaller scale housing commitments that form part of the established housing land supply. In addition to these sites the following sites are preferred as new housing sites at this stage.

Table 17: Tranent Cluster - Existing Housing Supply & Preferred New Housing Opportunities							
Site Ref		2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
	Existing Supply	135	20	0	155	155	
	Expand Existing Sites						
	None	0	0	0	0		
	New Allocations						
PREF-T4	Windygoul South	125	375	50	550		Windygoul South, Tranent is a preferred land release. A further southern expansion of the town could be promoted for circa 550 homes and other mixed land uses which would also provide for the expansion of Windygoul Primary School, including to accommodate other preferred sites in its catchment. There are concerns about transport impacts including an increased level of through traffic adjacent to Windygoul Primary School and, in the town centre, about the volume of through traffic and air quality impacts. However, traffic routing from this site may be to Edinburgh Road (A199) rather than High Street. Two points of access to the land would be required. The opportunity for or provision of a route between the B6371 and the B6414 through this site and through the adjacent site currently preferred for employment use (PREF – T3) should be secured. Detailed traffic modelling of traffic and air quality impacts is also required to establish if this proposal could be supported in the Proposed LDP. A comprehensive masterplan demonstrating how new development to the south of the town would be integrated with the wider landscape and the existing community to the north, including provision of cycle and pedestrian links, would be required. Suitable separation between the operational employment land to the south would also be necessary. This may be partially achieved in the

Table 17: Tranent Cluster - Existing Housing Supply & Preferred New Housing Opportunities

Site Ref		2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
							delivery of adequate open space as well as meeting Central Scotland Green Network objectives at site boundaries. A joint masterplan with employment site PREF – T3 would be required.
PREF-T2	Lammermoor Terrace	75	45	0	120		Lammermoor Terrace, Tranent, is a preferred land release. The allocation of land for approx 120 houses at Lammermoor Terrace could be supported, subject to impact on capacity of signals at Edinburgh Road junction and cumulative impacts on education capacity including at Windygoul Primary School, traffic and air quality (see above). Access from local road network should be possible. Structural landscape planting and open space provision would be required to integrate this site with the surroundings. A masterplan for the site would be required.
PREF-T1	Bankpark Grove	75	5	0	80		Bankpark Grove, Tranent, is a preferred land release. The allocation of land here for 80 houses could be supported, subject to ground conditions, access and cumulative impacts on education, traffic and air quality (see above). The ability to secure access must be proven. This site is within the catchment of Sanderson's Wynd Primary School. Structural landscape planting and open space provision would be required to integrate this site with the surroundings. A masterplan for the site would be required.
PREF-T8	Macmerry North	75	75	0	150		Macmerry North is a preferred land release. The allocation of land for approximately 150 houses could be supported. The allocation would be subject to suitable landscape proposals, ground conditions, access including cumulative impact on Tranent High Street (including air quality) and education capacity. Access on to the local road network at the A199 should be possible. Any development here should seek to allow connections to be made to Greendykes Road and Chesterhall Avenue. Development of this site would continue the northern expansion of the settlement but retain a setting between it and the A1 (T). Structural landscape planting and open space provision would be required to integrate this site with the surroundings and to provide a setting for the settlement. A masterplan for the site would be required.

Table 17: Tranent Cluster - Existing Housing Supply & Preferred New Housing Opportunities

Site Ref		2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
PREF-T11	Tynemount West (Ormiston)	40	30	0	70		Tynemount West, Ormiston, is a preferred land release. The allocation of land for 70 houses here could be supported to complete a logical expansion of the village, subject to ground conditions, access and cumulative impacts on education, traffic and air quality (see above). Site access to the local road network should be possible. Structural landscape planting and open space provision would be required to integrate this site with the surroundings, particularly at the western boundary to emulate the existing urban edge to the south. A suitable masterplan to integrate this site as part of development in the wider area including the existing allocation and PREF – T12 would be required.
PREF-T12	Tynemount East (Ormiston)	16	0	0	16		Tynemount East, Ormiston, is a preferred land release. The allocation of land for 16 houses here could be supported to complete the logical allocation for the expansion of the village, subject to ground conditions, access and cumulative impacts on education, traffic and air quality (see above). Site access to the local road network should be possible. A suitable masterplan to integrate this site as part of development in the wider area including the existing allocation and PREF – T11 would be required.
PREF-T10	Elphinstone West	80	0	0	80		Elphinstone West is a preferred land release. The allocation of land for circa 80 houses to the north-west side of the settlement could be supported, subject to ground conditions, access and cumulative impacts on education, traffic and air quality (see above). Land is in the same ownership to the south should an expansion of Elphinstone Primary School be required. Provision should be made within the site for turning and parking areas for and adjacent to the existing playing field to the west of the site. The encroachment of built development on to the rising land to the north must be minimised, where there is significant scope to accommodate additional woodland planting to expand the existing shelter belt to the east to contribute to Central Scotland Green Network objectives. There is also scope to accommodate open space to the north of the site and to ensure it connects with the existing open space on Main Street and the adjacent playing field. Structural landscape planting would be required to integrate this site with the surroundings as would a masterplan.

Table 17: Tranent Cluster - Existing Housing Supply & Preferred New Housing Opportunities

Site Ref		2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
PREF-T13	Woodhall Road (Pencaitland)	16	0	0	16		Woodhall Road, Pencaitland, is a preferred land release. A small scale westward expansion of the settlement to the west of the existing housing area could be supported, subject to ground conditions, access and cumulative impacts on education, traffic and air quality (see above). Access to the site should be achievable via Woodhall Road. Any housing here would be subject to provision of additional education capacity if required. A suitable design to integrate this site with its surroundings would be required. A masterplan for the site would also be necessary.
PREF-T14	Lempockwells Rd (Pencaitland)	75	40	0	115		Lempockwells Road, Pencaitland, is a preferred land release. A southern expansion of Pencaitland to the south of the existing housing area could be supported, subject to ground conditions, access and cumulative impacts on education, traffic and air quality (see above). There are opportunities for integration with the existing urban area and to connect to the adjacent railway walk. Access should be taken from Bruce Grove and / or potentially Lempockwells Road. Areas to the west of the site are elevated and built development should be kept clear of these areas. Significant landscape planting to the southern boundary should be provided as an extension of the significant and mature roadside planting to the east of the site. There are opportunities to complement and expand existing open space on the existing edge of the settlement. Site access needs to be resolved. Any housing here would be subject to provision of additional education capacity if required. Structural landscape planting and open space provision would be required to integrate this site with the surroundings. A masterplan for the site would also be required.
PREF-M11	Dolphingstone (Safeguard circa 400 Homes)	0	0	0	0		This site is detailed within the Musselburgh cluster area – see page 85.
<i>Sub Total</i>		<i>577</i>	<i>570</i>	<i>50</i>	<i>1197</i>	<i>1,197</i>	
Totals		712	590	50	1,352	1,352	

Reasonable Alternative Sites & Other Site Options

6.48 At this stage the following sites may be reasonable alternative development opportunities or other site options.

Table 18: Tranent Cluster - Reasonable Alternative Sites & Other Site Options

Site Ref	Site Name	Comments
ALT-T6	Kingslaw, Tranent	Site T6 is currently allocated for employment, and the preference is to retain the allocation of the land as such. However, an eastward expansion of Tranent may be a reasonable alternative development opportunity. If there is to be any significant housing/employment growth to the east of Tranent there would need to be a comprehensive and co-ordinated masterplan for such an expansion. A clear approach to the most effective transport solution would also be required. Tranent High Street is at capacity, consequent on levels of through traffic, and ELC Transportation advises that any development which adds significant vehicle through trips to this is unlikely to be acceptable. There is no shortage of potential development sites submitted for consideration on the east side of Tranent: these comprise approximately 57 hectares of land with a capacity for well over 1,000 houses. However, they are all separate submissions, and there is no indication as to how these might be co-ordinated for this land to be comprehensively designed, developed and accessed, specifically how it might deliver an eastern bypass that routes traffic generated by such a proposal to avoid using Tranent High Street to access the A1 (T). There is also concern that an eastern by-pass of Tranent, if connected to the Bankton A1 (T) interchange, would undermine the ability to access Blindwells from that trunk road interchange, particularly if Blindwells were to expand beyond 1,600 homes. Additionally, primary and secondary education solutions are not currently available to support such an expansion, and a larger scale of growth than could be achieved through current submissions may be required to justify, fund and deliver them.
ALT-T5	Tranent East	As above.
ALT-T7	Tranent Mains	As above. In addition, the site submissions for the land to the east of Tranent Cemetery suggest this area be developed for a Park and Ride facility, but it may be a more reasonable alternative site for circa 30 homes, subject to ground conditions, access and education capacity; however, if an eastern Tranent bypass were to be supported as part of any housing land release on the east side of Tranent then this small site could have a significant role in connecting this housing, likely via an improved / realigned Tranent Mains Road, to the Bankton A1(T) Interchange. Overall, the land contributes to the setting of Tranent and its cemetery and its development is not supported at this stage. The submission for the land to the west of the cemetery suggests scope for a budget hotel, nursing home or similar forming a gateway to the town. The land on the west side of Tranent cemetery may also be a reasonable alternative site, if development of land on the east of the cemetery were supported too. If this site to the west of the cemetery were to be developed, it may provide a better location for a Park and Ride facility given its proximity to the A1 (T) and public transport routes than the land to the east. However, whilst the 2009 Strategic Transport Projects Review did identify a need for a Park and Ride Facility around Tranent, it may be better located at Blindwells. Overall, this land makes a significant contribution to the setting of Tranent and its cemetery and its development is not supported at this stage.

Infrastructure issues

Secondary education

6.49 Ross High has no existing available capacity but has moderate expansion potential which would only be sufficient to accommodate the impact of the preferred sites set out above. This would prevent the school providing any further secondary school capacity.

Primary education

6.50 The main issues here are:

- Sandersons Wynd PS has some potential for further expansion;
- Windygoul, already a large and pressurised primary school, requires further expansion to accommodate current pupil roll projections. This includes a need for additional land. Any campus expansion will have to be southwards onto land that is not in the Council's control and for which submissions have been made for housing. The allocation of this land for housing would allow additional land to be provided for the further expansion of the school and this must be sufficient to accommodate the cumulative impact of development in the catchment area and developer contributions would be sought as appropriate;
- Macmerry PS has some existing capacity and some ability to expand further to accommodate the preferred site, should this be required;
- Outwith the SDA, some capacity exists or some may be provided at Pencaitland / Ormiston / Elphinstone to accommodate preferred sites.

Transportation

6.51 A Transport Assessment submitted for housing development on land south of Windygoul suggests that a transport solution for the development of land there exists, and that the traffic impacts could be mitigated, by employing a one-way gyratory system using Bridge Street, New Row and Elphinstone Road. Another option may be to make a section of Church Street between the junction of High Street and Winton Place one way (northbound) and to make Winton Place one way (southbound). New signalised crossings would be introduced. The acceptability of any solution, and the consequential impacts on air quality, is to be confirmed by ELC Transportation, taking in to account the cumulative impact of development. It is also considering the potential for a new road to the west that would link Elphinstone Road via Crookston Road to the Wallyford A1 (T) Interchange.

- 6.52 Tranent High Street experiences high levels of through traffic which has impacted on amenity and air quality in the town centre. Any further significant expansion of Tranent beyond the preferred strategy may require an eastern bypass which would provide relief to the High Street by allowing vehicles from the south an alternative, more direct access to the Bankton A1 (T) Interchange. The intention would be to link this to any new road to the Wallyford A1 (T) Interchange as described above.
- 6.53 A new eastern bypass of Tranent might connect into the Bankton junction via a link from Tranent Mains Road, just north of Tranent Mains Farm, and connect with a roundabout at the south of Tranent at the junction between the B6371 and B6355. The provision of such a road connection would be linked to the release of any land for development on the east side of Tranent and be funded by developers. However, there is no indication the various landowners here are aligned to promote such a solution. It is also not clear if this scale of development could be accommodated by the Bankton A1 (T) Interchange together with Blindwells traffic without undermining the ability to deliver the current Blindwells allocation or any expansion of it.

Water and Drainage

- 6.54 The implications of the preferred sites at Tranent can be accommodated by Scottish Water. It has indicated that capacity exists in its strategic assets to accommodate the preferred sites there in the short term. It may be that investment is required in to the medium / longer term to accommodate the cumulative impact of these sites together with those in other local authority areas. Water and drainage impact assessments will be required to establish solutions and for how connections to the local networks will be secured.

Mitigation

- 6.55 Mitigation requirements will include:

1. Delivery of the green network, including woodland planting, active travel routes and habitat networks;
2. Air Quality is being monitored and any new development must not undermine air quality objectives;
3. Trunk and local road impacts, including at Old Craighall, arising as a result of the cumulative impact of development including that within East Lothian;

4. Traffic and parking management measures are being considered for the town centre to ease vehicle flows and to assist in meeting air quality objectives;
5. Detailed modelling of traffic and air quality impacts to establish if the preferred strategy can be supported in the Proposed LDP;
6. Education capacity constraints would need to be overcome;
7. In to the medium / longer term additional strategic foul drainage capacity may be required, and solutions may be needed for settlements south of Tranent in the short term;
8. Identification of any ground conditions constraints and methods of mitigation;
9. Comprehensive masterplans would be required.

Those parties promoting development sites in this area must work together and with the Council to demonstrate to its satisfaction that the above issues can be satisfactorily addressed and associated mitigation delivered so sites are / can be made effective before they may be included in a Proposed LDP. It is expected that developer contributions will have a significant role to play in securing mitigation as appropriate.

Key Messages: Tranent Cluster

At this stage the preferred development opportunities in the Tranent cluster could deliver approximately **1,350 additional homes and 24 ha of additional employment land** over the period to 2024 and beyond. The cluster is highly accessible, including by public transport. It is in high demand as a place to live and offers the potential for job creation. Strategic water and drainage capacity is available to serve additional development. There are regeneration opportunities, but certain settlements have constraints to further expansion by environmental and infrastructure constraints and the need to ensure that the ability to deliver existing land allocations will not be undermined, including Blindwells. These factors will influence if and how settlements in this cluster may be expanded. The cumulative impact of additional development on the transport network is an issue that requires to be resolved, particularly at Tranent High Street and at Old Craighall and the Dolphinstone, Bankton and Gladsmuir A1 (T) interchanges. There may be potential for a new road to the west of Tranent that would link Elphinstone Road via Crookston Road to the Wallyford A1 (T) Interchange (in which case cumulative impacts at that interchange would need to be considered too). Subject to traffic and air quality impacts being acceptable, additional land for circa **550** homes as a further southern expansion of Windygoul could be supported. However, there is a need for a capacity expansion at Windygoul Primary School, with sufficient campus land to be provided to accommodate pupils from recent housing allocations as well as the cumulative impact of any additional housing development in its catchment area. This could be facilitated by a housing land release south of Windygoul, with sufficient school campus land for the cumulative impact of development in the area sought in association with it. A suitable separation between the operational employment land to the south would also be required as would a comprehensive masterplan. The opportunity for or provision of a route between the B6371 and the B6414 through this site and through the adjacent site currently preferred for employment use (**PREF – T3**) would also need to be secured. The release of land for approximately **80** houses at Bankpark Grove and **120** houses at Lammermoor Terrace could also be supported, subject to education capacity and access. However, certainty is required that the traffic/air quality impacts of any further land release at and around Tranent can be mitigated on a cumulative basis as appropriate. Elsewhere, Macmerry may be able to provide land with a capacity of about **150** houses, Elphinstone and Ormiston each approximately **80** and Pencaitland approximately **100**. Ross High School is able to be expanded only as much as required to accommodate preferred housing sites. Without an eastern bypass of Tranent there is little opportunity for any further significant housing growth here. To promote this would require a very substantial land release on the east side of the town, with consequent impacts on education provision, including an increase in secondary school capacity in the cluster, for which there is no clear solution. Any such scale of expansion accessed off the Bankton A1(T) Interchange would also need to be considered in view of the current as well as longer term vision for Blindwells new settlement – i.e. any expansion of Tranent must not compromise the current Blindwells allocation or any potential expansion of the new settlement. As such, an eastern expansion of Tranent is not supported at this stage.

Question 13: Tranent Cluster

Do you support the preferred approach to new economic development and housing opportunities in the Tranent cluster?

Do you think that all of the preferred housing sites can be delivered in the anticipated timeframe? Please explain why.

Potential options have been identified for how education capacity might be increased in the cluster. How do you think those options could be funded and delivered?

Where might any new education facilities be located if required?

Please indicate if you support or oppose particular preferred sites, reasonable alternative sites, or other site options, and explain why?

If you do not support the preferred sites, please indicate what alternative sites you would suggest?

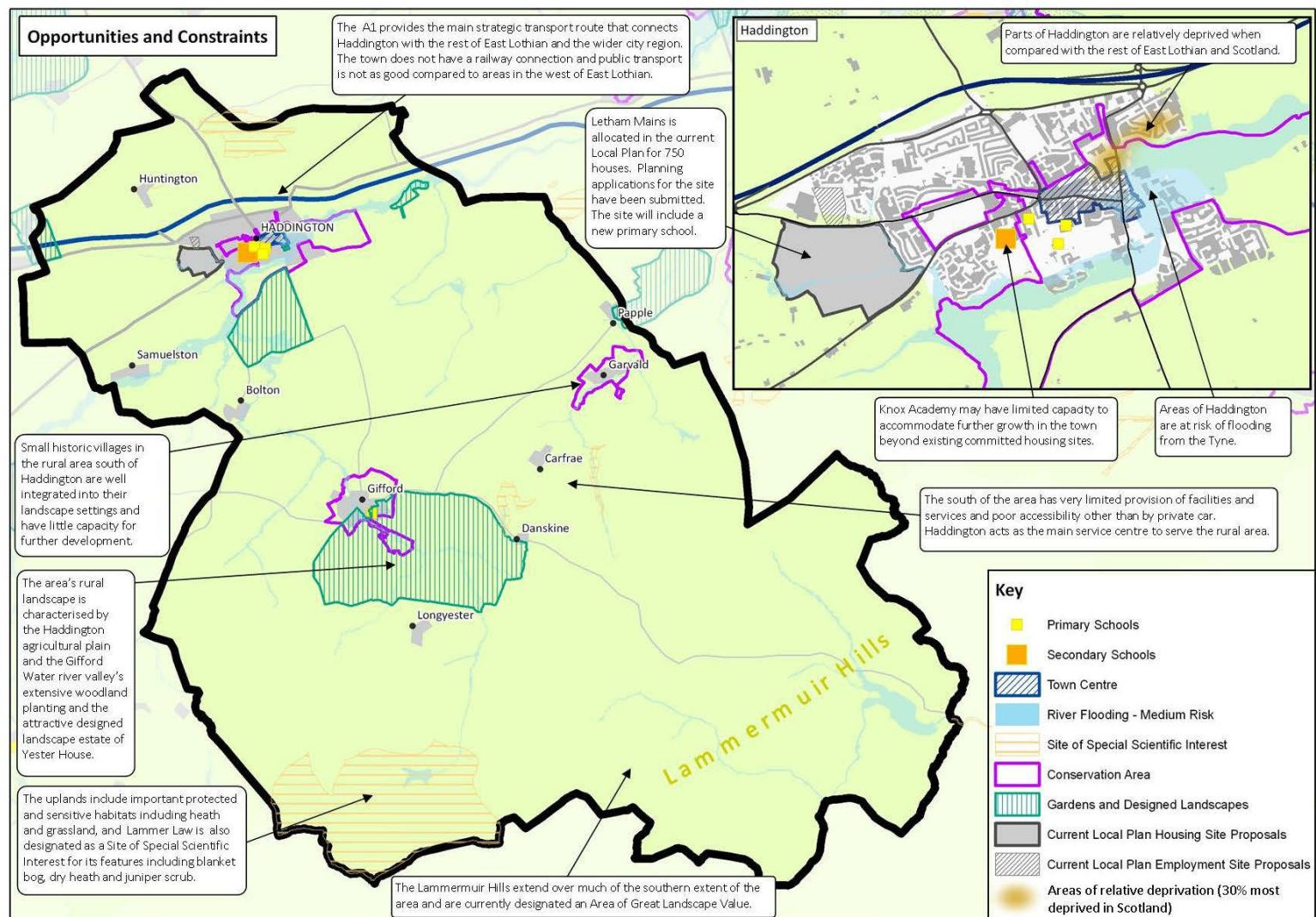
Do you have any other comments on the Tranent cluster area?

The Haddington Cluster

- 6.56** Haddington is the only settlement within Knox Academy's catchment area that is within the East Lothian Strategic Development Area (SDA). As it is outwith the western part of this SDA it is not preferred as the focus for identifying additional strategic development land at this stage. However, it could contribute to meeting this as the settlement is within the SDA.
- 6.57** The remaining settlements within the Haddington Cluster are not within the East Lothian SDA. They should not be a focus for additional strategic land allocations. However, sites outwith the SDA may be considered to help meet the housing land requirement and to help provide a range of sites of different types and sizes in different locations to help maintain a five year effective housing land supply at all times. In such circumstances, housing sites may be identified if they are appropriate ones and if they would help to maintain a five year housing land supply, consistent with SDP Policy 7.

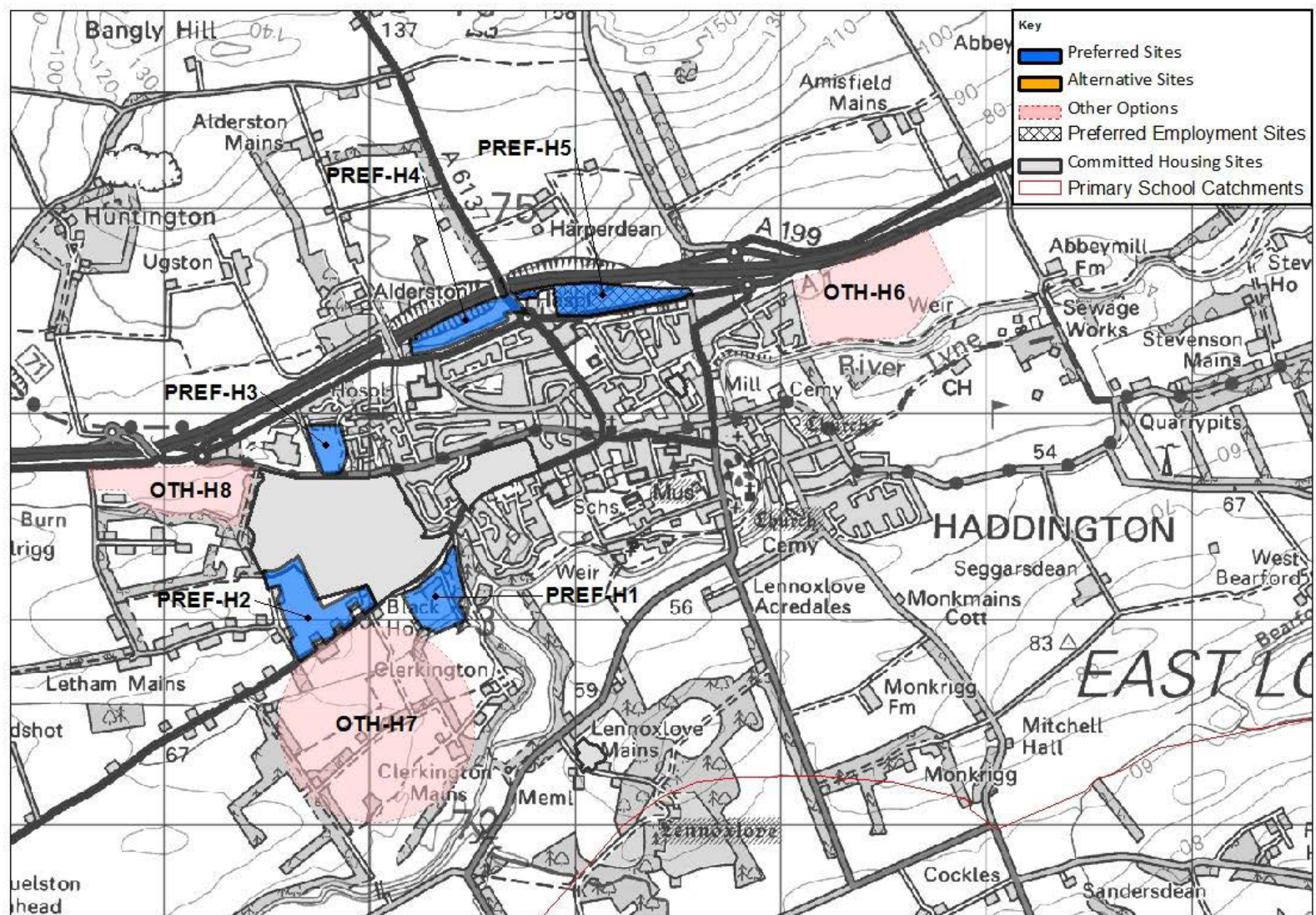
Countryside Around Towns

- 6.58** Haddington is located centrally within East Lothian and developed on low-lying land beside a crossing of the River Tyne. This feature is intrinsic to the settlement's character and landscape setting. The Tyne is also prone to flooding. The existing housing land allocation at Letham Mains has largely met the boundaries within which the landscape character and setting of the town can be conserved, and there is now limited scope for further development without compromising the town's historic character and setting. As such, consideration of a Countryside Around Town designation at Haddington is appropriate.
- 6.59** The A1(T) provides a robust boundary to the north of Haddington, its role now reinforced by an appeal decision supporting housing between it and the housing at Haldane Avenue. On the town's north-west edge, the tree-lined access to Letham House provides a strong edge to the Letham Mains allocation, and is linked to other tree belts providing a robust town boundary. The Letham Mains allocation, extending out from the town's western edge, would define a natural town boundary where it meets with the Letham Mains smallholdings. Further development to the south of the town may compromise the character and appearance of the Clerkington estate which, although not included on the National Inventory of Gardens and Designed Landscapes is an 18th century parkland designed landscape of regional or local importance that contributes to the setting of Haddington. However, as a consequence of an appeal decision, the south-west edge of the town has been extended into the Dovecot area. The land south of the Tyne extending from Clerkington to Seggarsdean and south of Amisfield Estate makes a significant contribution to the setting, character and appearance of the town. To the east the Amisfield and the open land north of the Tyne, provides expansive views of the town and its setting.



Preferred Economic Development Opportunities (subject to infrastructure provision and mitigation)

- 6.60** The preferred strategy supports the retention of existing operational employment areas. At this stage it also promotes a change in approach to land at Gateside East (**PREF – H3**). It could be promoted for employment use (circa 1ha) in association with a housing use (60 dwellings).
- 6.61** In addition to the above, at this stage the preferred strategy also includes a new employment opportunity at Peppercraig Quarry. Approximately 7 hectares of land for business use could be promoted to the east of the quarry, potentially including business, hotel and leisure uses. Access is achievable from the A199. Footpaths and crossing points would be required (**PREF –H5**).



Preferred housing opportunities (subject to infrastructure provision and mitigation)

6.62 The strategy supports the delivery of existing strategic housing land allocations as well as the other smaller scale housing commitments that form part of the established housing land supply. In addition to these sites the following sites are preferred as new housing sites at this stage.

Table 19: Haddington Cluster - Existing Housing Supply & Preferred New Housing Opportunities

Site Ref	2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
Existing Supply	480	396	0	876	876	
Expand Existing Sites						
PREF-H2 Letham Mains	0	242	33	275		Letham Mains is a preferred land release – i.e. the extension of the current Letham Mains housing allocation to allow development within the adjacent south west field. This would be a logical addition to the expansion of the settlement. This additional area of land could accommodate around 275 dwellings. Access could be provided from the road layout internal to the current allocation and related proposals should allow for this. Additional education capacity could be provided at the new Letham Mains Primary School once delivered and Knox Academy would require to be expanded. Structural landscape planting and open space provision would be required to integrate this site with the surroundings and to provide a setting for the settlement and adjacent Letham Mains Smallholdings. A masterplan would be required which integrates the development within its surroundings and complements and does not undermine the existing local plan proposal or any associated planning permission. A masterplan for the site would be required.
New Allocations						
PREF-H1 Dovecot	113	0	0	113		Dovecot is a preferred land release for 113 houses and this should be supported to reflect a planning appeal decision.
PREF-H3 Gateside East	60	0	0	60		Gateside East is a preferred land release. A mixed use housing and economic development use on Gateside East including 60 homes should be supported to reflect ELC 'minded to grant' decision on recent mixed use planning application.

Table 19: Haddington Cluster - Existing Housing Supply & Preferred New Housing Opportunities

Site Ref		2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
PREF-H4	Alderston	70	19	0	89		Alderston is a preferred land release. Development of land to the west of Aberlady Road for 89 houses should be supported to reflect a planning appeal decision.
	<i>Sub Total</i>	<i>243</i>	<i>261</i>	<i>33</i>	<i>537</i>	<i>537</i>	
	Totals	723	657	33	1413	1,413	

Reasonable Alternative Sites & Other Site Options

6.63 At this stage the following sites may be reasonable alternative development opportunities or other site options.

Table 20: Haddington Cluster - Reasonable Alternative Sites & Other Site Options

Site Ref	Site Name	Comments
OTH – H7	Dovecot	Land at Dovecot is another option for the expansion of Haddington, although no site submission has been received for this entire area during the call for sites. A further significant expansion of the preferred Dovecot site, possibly in association with the provision of land for employment, may be an option subject to education capacity and access issues being resolved. However, education capacity at primary level in Haddington is very constrained. Very limited additional education capacity, if any, could be made available at existing catchment schools. Any further development at Dovecot would need to find an education solution, possibly involving provision of a new primary school. The scale of development necessary to justify this would generate additional vehicle trips onto the surrounding road network. The provision of a new link road through the adjacent Letham Mains site once in place (in to the medium term) may help mitigate this, but the ability to fully mitigate all transport impacts would need to be demonstrated to the Council's satisfaction. Additionally, the impact on the character and setting of the Clerkington Designed Landscape would require mitigation. Structural landscape planting and open space would be required to integrate any development with the surroundings and to provide an attractive edge and setting for the town.
OTH – H6	Amisfield	Land at Amisfield is another option for the expansion of Haddington. Land to the east of Haddington between the A1 and the River Tyne may accommodate around 500 homes, subject to education and access solutions. However, the site is visually exposed, including from the A1 and A199, and the southern part is in an area of flood risk. The open nature of the land is important to the setting of Haddington and the adjacent Amisfield Designed Landscape and conservation area. Development here would have a harmful impact on the character and setting of the town and these cultural heritage areas. It is also uncertain if a suitable and deliverable site access can be achieved.

OTH – H8	West Letham	Land at West Letham is another option for the expansion of Haddington. It may accommodate up to 600 dwellings. Site access from local road network may be possible. However, the site is visually exposed and beyond what will become the well defined urban edge to the town provided by the Letham Mains policy woodland. The open nature of this land is important to the character and setting of Haddington and development here would harm this. Education capacity would be a significant issue as with other sites in the area. Integration with the existing settlement is also a concern, including via path links.
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Infrastructure issues

Secondary education

6.64 Knox Academy has some limited capacity for expansion subject to solutions being found for the loss of sports pitches and the redesignation of an existing right of way.

Primary education

6.65 There are constraints on the availability of any further primary school capacity in this cluster other than that needed for the preferred sites. Gifford's Yester Primary is the only primary school with any potential for significant expansion, but this settlement is outwith the SDPs SDA.

6.66 A new primary school is required to accommodate pupils from the existing Letham Mains allocation and the current proposed masterplan does allow limited scope for further expansion of the new primary school, subject to programming of housing development. Some temporary education capacity for the Letham Mains site, outwith the catchment area defined for the new Letham Mains school, may be made available in advance of the new school's completion at Letham Mains. It would not be possible for a new Letham Mains primary school to take pupils from a wider catchment area without further extending the school's footprint and / or campus. This would (i) require a review of existing masterplan proposals at Letham Mains (ii) require a school catchment review and (iii) mean the release of any additional housing land would be predicated on the timing for completion of the primary at Letham Mains.

Transportation

6.67 ELC Transportation has advised that the cumulative impact of potential development sites in the west of Haddington may result in significant traffic

impact on the west Haddington/B6471 corridor and town centre. It would require a model to be prepared to define the scale of the cumulative traffic impacts. ELC Transportation can facilitate the modelling exercise but its funding, or the provision of components of the model, should be provided by developers wishing to develop sites on this corridor.

Water and Drainage

6.68 The implications of the committed sites on this area could be accommodated by Scottish Water, but enhancements will be required to strategic waste water assets to bring forward additional development in the area in the medium and long term. Water and drainage impact assessments will be required to establish solutions for the medium and longer term for strategic assets and for how connections to the local networks will be secured.

Mitigation

6.69 Mitigation requirements will include:

1. Delivery of the green network, including woodland planting, active travel routes and habitat networks;
2. Trunk and local road impacts, including at Old Craighall, arising as a result of the cumulative impact of development including that within East Lothian;
3. Detailed traffic modelling of traffic impacts to establish if the preferred strategy can be supported in the Proposed LDP;
4. Traffic and parking management could be considered as measures to ease vehicle flows;
5. Education capacity constraints would need to be overcome;
6. Foul drainage constraints would need to be overcome;
7. Identification of any ground conditions constraints and methods of mitigation;
8. Comprehensive masterplans would be required.

Those parties promoting development sites in this area must work together and with the Council to demonstrate to its satisfaction that the above issues can be satisfactorily addressed and associated mitigation delivered so sites are / can be made effective before they may be included in a Proposed LDP. It is expected that developer contributions will have a significant role to play in securing mitigation as appropriate.

Key Messages: Haddington Cluster

At this stage the preferred development opportunities in the Haddington cluster could deliver approximately **1,400 additional homes and a minimum of 8 ha of employment land** over the period to 2024 and beyond. In regional terms Haddington is accessible, including by public transport, but less so than settlements to the west of East Lothian and Dunbar. The cumulative impact of additional development on the transport network, including at Old Craighall, is an issue that needs to be resolved. The traffic impacts of further development, in particular in the west of Haddington, would require to be modelled. Haddington is in high demand as a place to live and offers some potential for job creation, but fewer homes are sold here than locations further west. Solutions for additional strategic water and drainage capacity will be required to accommodate further additional development here beyond current commitments and these are unlikely to come forward in the short term. The settlements are also constrained from further expansion by environmental and / or other infrastructure constraints and the need to ensure the ability to deliver existing land allocations and / or planning permissions will not be undermined. The availability / ability to provide additional primary education capacity at Haddington Infant and Primary School is a significant constraint to further housing development beyond current commitments. The new Letham Mains Primary School, once delivered, may provide an opportunity to increase primary education capacity within the town to facilitate further housing development in the medium to long term as an expansion of that strategic site. The preferred housing sites can be accommodated while conserving the character and setting of Haddington and education capacity can be provided to accommodate them. Other options for the expansion of Haddington are land to the east at Amisfield, land to the south-west as a further expansion of Dovecot, and land to the north west beyond Letham Mains. With the possible exception of a further expansion at Dovecot (in view of the recent planning appeal decision there) all of these sites would have an adverse impact on the town's character and setting. In addition, if any further housing development were to be supported at Haddington, primary and secondary education solutions would need to be found.

Question 14: Haddington Cluster

Do you support the preferred approach to new economic development and housing opportunities in the Haddington cluster?

Do you think that all of the preferred housing sites can be delivered in the anticipated timeframe? Please explain why.

Potential options have been identified for how education capacity might be increased in the cluster. How do you think those options could be funded and delivered?

Where might any new education facilities be located if required?

Please indicate if you support or oppose particular preferred sites, reasonable alternative sites, or other site options, and explain why?

If you do not support the preferred sites, please indicate what alternative sites you would suggest?

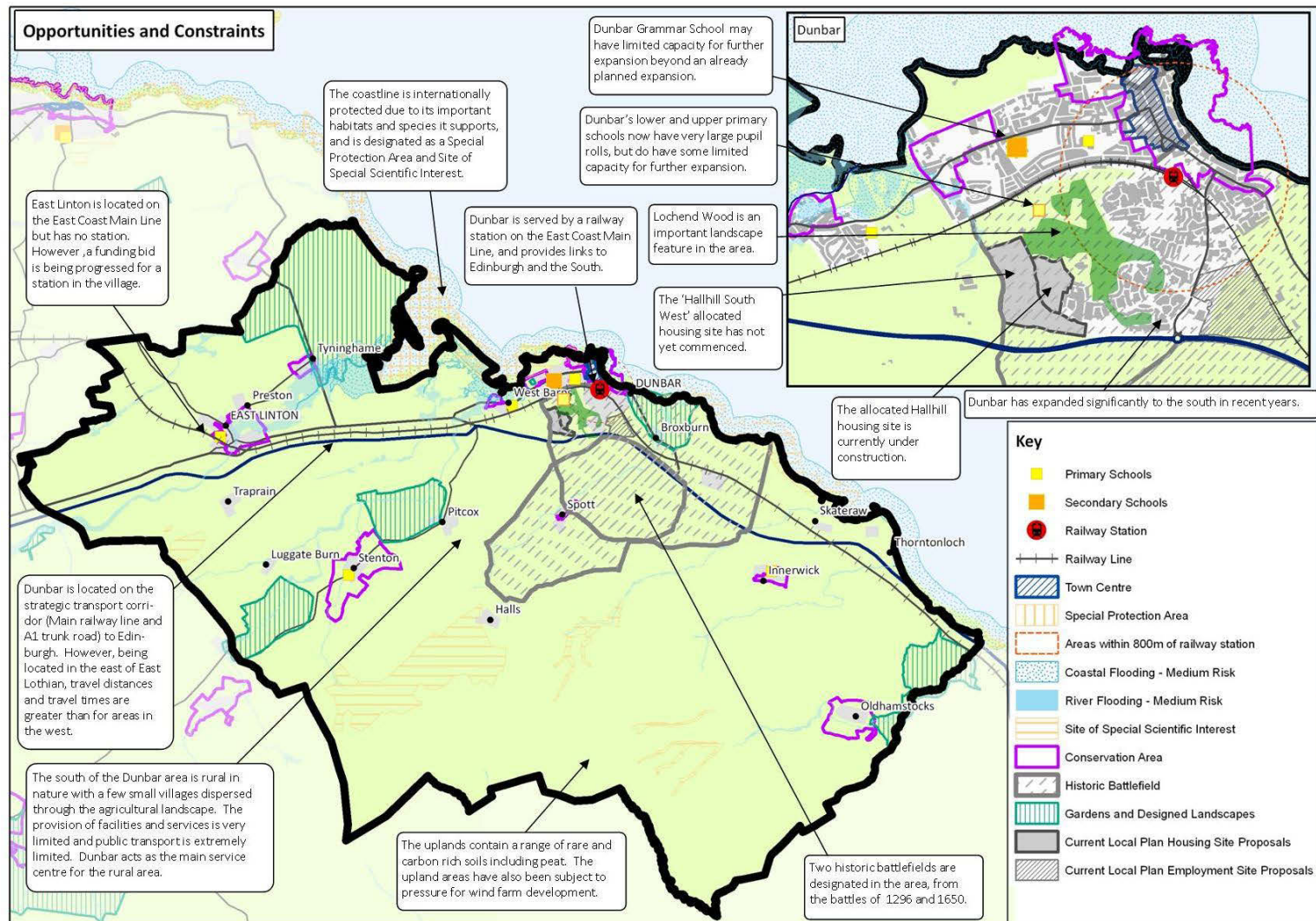
Do you have any other comments on the Haddington cluster area?

The Dunbar Cluster

- 6.70** Dunbar / Belhaven, West Barns, East Linton and Innerwick are those settlements that are within the East Lothian Strategic Development Area (SDA). As they are outwith the western part of the SDA these settlements are not preferred as the focus for identifying additional strategic development land at this stage. However, they could contribute to this as they are within the SDA. Yet Innerwick is a small settlement by comparison and any development there must reflect this as well as the character of the settlement and local area.
- 6.71** The remaining area/settlements are not considered to fall within the East Lothian SDA. Consequently, they should not be a focus for additional strategic land allocations. However, sites outwith the SDA may be considered to help meet the East Lothian housing land requirement and to help provide a range of sites of different types and sizes in different locations in order to maintain a five year effective housing land supply at all times. In such circumstances, such housing sites may be identified if they are appropriate ones and if they would help to maintain a five year housing land supply, consistent with SDP Policy 7.

Countryside Around Towns

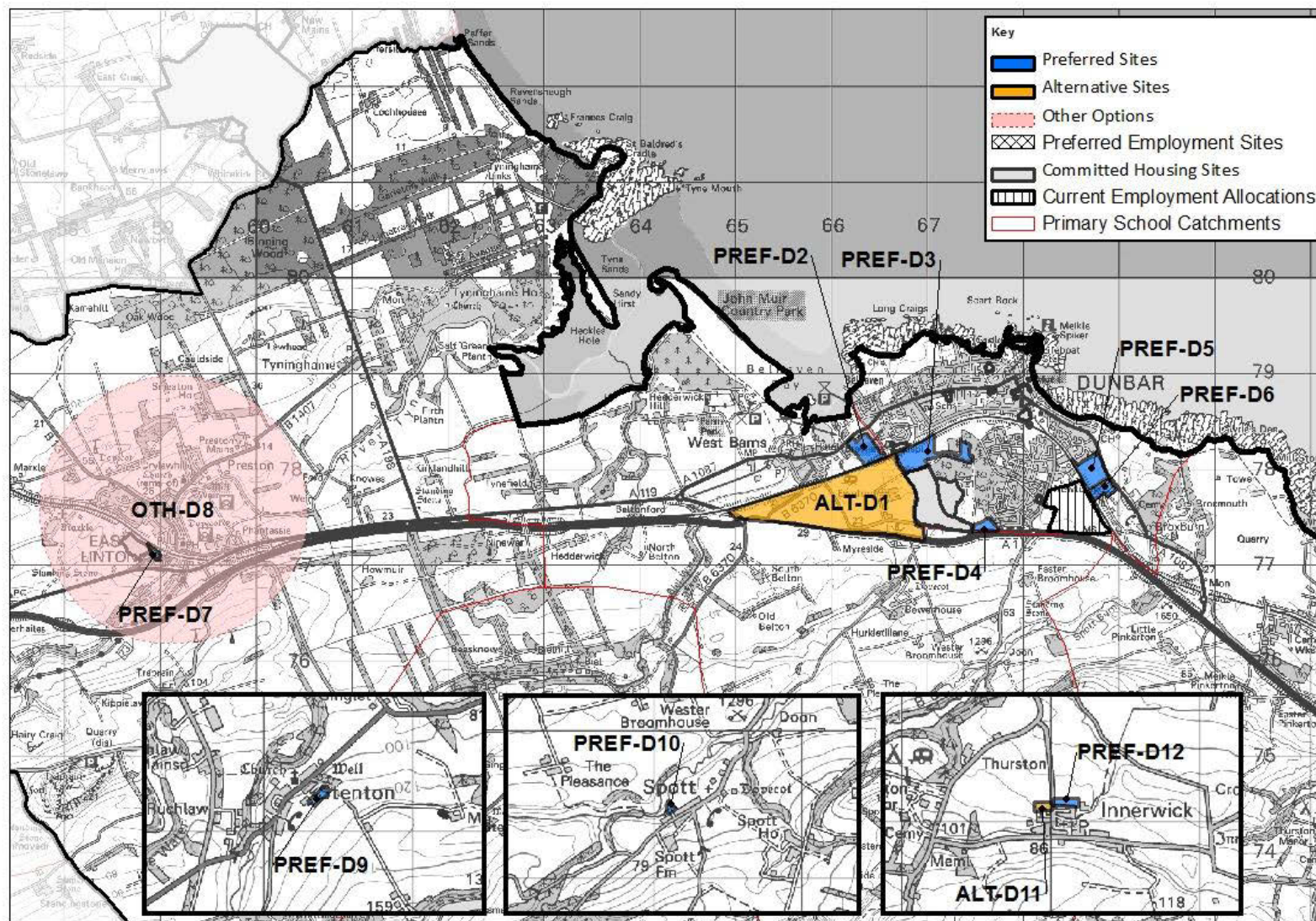
- 6.72** In terms of the setting and separate identities of settlements, some separation between Dunbar / Belhaven and West Barns should be retained. This is particularly important in view of a recent appeal decision at Beveridge Row, where housing development will extend further west from Dunbar / Belhaven towards West Barns.
- 6.73** Similarly, East Linton developed in a low topographical feature / river valley and recent housing allocations there have sought to contain the settlement within this landscape feature. As such, Countryside Around Town designations may be considered in these locations.



Preferred Economic Development Opportunities (subject to infrastructure provision and mitigation)

6.74 The preferred strategy supports the retention of existing operational employment areas as well as the employment allocations of the current local plan. The following approach is preferred at this stage:

- Retain approximately 12 hectares of undeveloped land currently allocated for employment at Spott Road, Dunbar (not including the 7.5ha with planning permission for a solar energy park);
- Approximately 3.4ha of land at Newtonlees Dunbar could be promoted for employment use (**PREF – D6**);
- Approximately 1ha of land at East Linton Auction Mart should be retained for employment use (**PREF – D7**)



Preferred housing opportunities (subject to infrastructure provision and mitigation)

6.75 The strategy supports the delivery of existing strategic housing land allocations as well as the other smaller scale housing commitments that form part of the established housing land supply. In addition to these sites the following sites are preferred as new housing sites at this stage.

Table 21: Dunbar Cluster - Existing Housing Supply & Preferred New Housing Opportunities

Site Ref		2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
Existing Supply		605	256	0	861	861	
Expand Existing Sites							
	None	0	0	0	0		
New Allocations							
PREF-D3	Hallhill North	0	125	125	250		Land at Hallhill North is a preferred land release. The allocation of all or part of this land for housing development could be supported, subject to any need to safeguard land for the expansion of adjacent education facilities in the longer term (see comments on Eweford Farm below) and the provision of additional education capacity for this site and any others. Site access from local road network should be possible. However, vehicle access to this site must only be taken from the Hallhill site to the south. Pedestrian and cycle routes must be provided, including connections to the north of the rail line. Development of this site would need to follow Hallhill south west's provision of associated access, services and drainage infrastructure. Completions from this site are not anticipated until 2019 at the earliest. A masterplan for the site would be required.
PREF-D5	Newtonlees North	75	175	0	250		Land at Newtonlees North is a preferred land release. The allocation of land for approximately 250 houses between Beachmount Place and Newtonlees, Dunbar could be supported; however, approximately 3.4ha of land to the south of this site is also supported for employment / community use.

Table 21: Dunbar Cluster - Existing Housing Supply & Preferred New Housing Opportunities

Site Ref		2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
							Vehicular access should be possible off A1087, and a separate access should also be possible in the event of a mixed use proposal. The impact of development here on the local road network would need to be assessed, particularly on the Spott Road and Queens Road junction. Education capacity and access to schools would need to be resolved for any housing, potentially involving provision of a footpath across the adjacent employment land via an underpass of the East Coast Main Rail line the delivery of which must be investigated. Structural landscape planting and open space provision would be required to integrate this site with the surroundings and to provide a setting for the settlement. A masterplan would be required.
PREF-D4	Brodie Road	50	0	0	50		Land at Brodie Road is a preferred land release. The allocation of land for approximately 50 houses at Hallhill, Dunbar, between Brodie Road and the A1, opposite Steadings Crescent could be supported subject to additional education capacity being made available. This site is currently allocated for hotel use but provision for this facility has already been made elsewhere in the town at Spott Road. Vehicular access should be taken from Brodie Road only and pedestrian links with the surrounding area would be required. Appropriate structural landscape planting and open space provision would be required to integrate this site with the surroundings and to provide a setting for the settlement. Any requirement for noise mitigation may also need to be investigated. A masterplan would be required.
PREF-D2	Beveridge Row	40	50	0	90		Land at Beveridge Row is a preferred land release. The allocation of land at Beveridge Row, Belhaven for 90 houses reflects a planning appeal decision and should therefore be supported.

Table 21: Dunbar Cluster - Existing Housing Supply & Preferred New Housing Opportunities

Site Ref		2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
PREF-D12	Innerwick East	18	0	0	18		Land at Innerwick East is a preferred land release. The allocation of land for approximately 18 houses immediately north of Kirk Brae, Innerwick could be supported, subject to availability of education capacity. Access may be achievable from C125 with existing 30mph extended southwards. The site has good accessibility to the primary school. A suitable design to integrate this site as part of the settlement and local area would be required as would a masterplan.
PREF-D10	St John Street (Spott)	6	0	0	6		Land at St John's Street, Spott is a preferred land release, subject to availability of education capacity. The allocation of land for approximately 6 houses immediately north of St John's Street could be supported. Access should be achieved via St John's Street. A suitable design to integrate this site as part of the settlement and local area would be required. A masterplan for the site would be required.
PREF-D9	The Crofts (Stenton)	16	0	0	16		Land at The Crofts, Stenton is a preferred land release, subject to availability of education capacity. The allocation of land for approximately 16 houses immediately south of The Crofts could be supported. Access should be achieved via the B6370 and the U188. A suitable design to integrate this site as part of the settlement and local area would be required as would a masterplan.
	<i>Sub Total</i>	<i>205</i>	<i>350</i>	<i>125</i>	<i>680</i>	<i>680</i>	
	Totals	810	606	125	1541	1,541	

Reasonable Alternative Sites & Other Site Options

6.76 At this stage the following sites may be reasonable alternative development opportunities or other site options.

Table 22: Dunbar Cluster - Reasonable Alternative Sites & Other Site Options		
Site Ref	Site Name	Comments
ALT – D1	Eweford	Land at Eweford Farm may be an alternative site with capacity for approximately 1,000 homes and other mixed land uses. However, allocations at Hallhill continue to be prioritised. To further consider Eweford in the longer term matters to be resolved include the means of access to the site, in particular how this might be provided without adding additional vehicle journeys to Spott Road in Dunbar. Additional connections may be considered to Thistly Cross roundabout. A second vehicle access may need to be provided over the East Coast Main Line where it is in cutting. This would provide a direct vehicular access into Dunbar from the A1 Expressway over the East Coast Main Line to connect with Edinburgh Road. Land to the west of the housing at Beveridge Row may provide scope for the alignment of such a route. In terms of education provision, potential options include provision of a new primary school for Eweford, an expansion of Dunbar Primary School potentially utilising part of the preferred Hallhill North site (PREF – D3) for this, or a potential replacement for West Barns Primary School to be provided within and as part of the solution for the Eweford site. The replacement of West Barns Primary School may offer an alternative option for the alignment of any road crossing of the rail line. Dunbar Grammar would also require to be expanded and to allow for this the relocation of sports pitches south of the rail line is likely to be required. In addition, the landscape setting and the need to retain separation between Dunbar / Belhaven and West Barns will be key considerations, as will CSGN objectives and provision of open space and structural landscaping. Consideration would need to be given to how any structural planting at Eweford could be connected to Lochend Woods to the east.
ALT-D11	Innerwick West	Land at Innerwick West may be a reasonable alternative development site, subject to education capacity and access. A suitable design to integrate this site as part of the settlement and local area would be required.
OTH-D8	East Linton Expansion Area of Search	East Linton may be considered as a location for further development in the short, medium or long term, subject to education capacity. There is support for a new rail halt and this would significantly enhance the village's accessibility in regional terms, if delivered. However, any further housing development here would have to take account of the sensitive landscape setting of the historic village, which was established in the valley of the River Tyne, beneath Pencraig Hill. Recent housing allocations have sought to contain the settlement within this landscape feature and additional growth may undermine this characteristic of the settlement. Lower lying land within the valley is constrained by cultural heritage features or by risk of flooding. Any significant encroachment on to higher land to the north, south and west would not be supported. However, there may be limited scope for additional housing development without significantly compromising the character and setting of the settlement if it were to expand to the east. However, land to the west is closer to any rail halt, the primary school and main road network.

Infrastructure issues

Secondary education

- 6.77 Dunbar Grammar has the potential for some increase in its existing capacity if solutions are found for the loss of sports pitches, for example the identification of additional land off-site.

Primary education

- 6.78 All primary schools have available capacity or capacity for expansion other than Stenton Primary School.

Transportation

- 6.79 There are concerns about the capacity of Spott Road and Queens Road junction in Dunbar to accommodate additional vehicle flows, being main arterial routes in to the town. The provision of additional pedestrian and cycle access between the northern and southern parts of the town separated by the rail line would also be required in association with any new development.
- 6.80 At East Linton a new rail station is being supported in ongoing studies, but there is currently no commitment to its provision / funding from the Scottish Government. It is subject to the provision of a new service to East Linton, part of the Scotrail franchise due to be awarded in October 2014.

Water and Drainage

- 6.81 The implications of the committed sites on this area could be accommodated by Scottish Water, but enhancements will be required to strategic waste water assets to bring forward additional development in the area in the medium and long term. Water and drainage impact assessments will be required to establish solutions for the medium and longer term for strategic assets and for how connections to the local networks will be secured.

Mitigation

6.82 Mitigation requirements will include:

1. Delivery of the green network, including woodland planting, active travel routes and habitat networks;
2. Trunk and local road impacts, including at Old Craighall, arising as a result of the cumulative impact of development including that within East Lothian;
3. Traffic and parking management could be considered as measures to ease vehicle flows;
4. Noise impacts and the visual impacts of mitigation requirements arising from increased vehicle flows, the rail network and noise from adjoining land uses will need to be taken into account;
5. Education capacity constraints would need to be overcome;
6. Foul drainage constraints would need to be overcome;
7. Identification of any ground conditions constraints and methods of mitigation;
8. Comprehensive masterplans would be required.

Those parties promoting development sites in this area must work together and with the Council to demonstrate to its satisfaction that the above issues can be satisfactorily addressed and associated mitigation delivered so sites are / can be made effective before they may be included in a Proposed LDP. It is expected that developer contributions will have a significant role to play in securing mitigation as appropriate.

Other Proposals

6.83 The 100ha north west quarry by Dunbar which was previously used for limestone extraction and is now being restored. The LDP would support the use of this area for biodiversity enhancement and conservation, wildlife viewing, nature based tourism and environmental education. The plan at Appendix 4 illustrates the potential boundaries for such a designation.

Key Messages: Dunbar Cluster

At this stage the preferred development opportunities in the Dunbar cluster could deliver approximately **1550 additional homes and 16.4 ha of employment land** over the period to 2024 and beyond. In regional terms Dunbar is accessible, including by public transport, but less so than settlements in the west of East Lothian. The Council supports the provision of a new rail halt at East Linton but delivery of that facility is yet to be confirmed. The cumulative impact of additional development on the transport network, including at Old Craighall junction, is an issue that needs to be resolved. The traffic impacts of further development here require to be modelled. The area is in demand as a place to live, but fewer homes are sold here than in locations further west. The cluster also offers some potential for job creation, but a significant amount of employment land is allocated here already but has not been developed for employment uses: the existing supply of economic land in this area is sufficient for foreseeable needs and its retention would be consistent with the SDP and complement the additional housing which may be delivered at the preferred sites. This would also help reduce the need to travel as well as the distance that need be travelled to access employment opportunities locally. Solutions for additional strategic water and drainage capacity will be required to accommodate further additional development beyond current commitments and this is unlikely to be resolved in the short term. The preferred housing sites at Dunbar can be accommodated with the provision of additional education capacity as can the preferred housing opportunities at Spott, Stenton and Innerwick. Dunbar Infant and Primary School has the capability to expand further than required to accommodate current commitments. However, it is projected to be the largest primary school in East Lothian and further significant expansion of the facility may not be supported. Additional primary school facilities would be required to accommodate any further significant housing development around Dunbar / Belhaven / West Barns. One option for this would be at Eweford Farm, where a new primary school could be provided in association with circa 1,000 homes there; another option might be for any new primary school at Eweford to serve such a development but also be made large enough to replace West Barns Primary School; either approach would require school catchment review. A new road crossing of the East Coast Main Line would also be sought to address future circulatory and severance issues to the town centre, and to provide access for the Eweford site should it come forward. This may provide an opportunity for a new road alignment over the East Coast Main Line. Significant growth in the cluster would require expansions to Dunbar Grammar, requiring the reprovision of sports pitches potentially south of the rail line on land which is not owned by the Council, possibly on part of the site at Hallhill North (see PREF – D3). If a new rail halt at East Linton is deliverable, an expansion of that settlement may be considered. Environmental and infrastructure constraints at East Linton would need to be taken in to account if any further development were to be directed to that settlement.

Question 15: Dunbar Cluster

Do you support the preferred approach to new economic development and housing opportunities in the Dunbar cluster?

Do you think that all of the preferred housing sites can be delivered in the anticipated timeframe? Please explain why.

Potential options have been identified for how education capacity might be increased in the cluster. How do you think those options could be funded and delivered?

Where might any new education facilities be located if required?

Please indicate if you support or oppose particular preferred sites, reasonable alternative sites, or other site options, and explain why?

If you do not support the preferred sites, please indicate what alternative sites you would suggest?

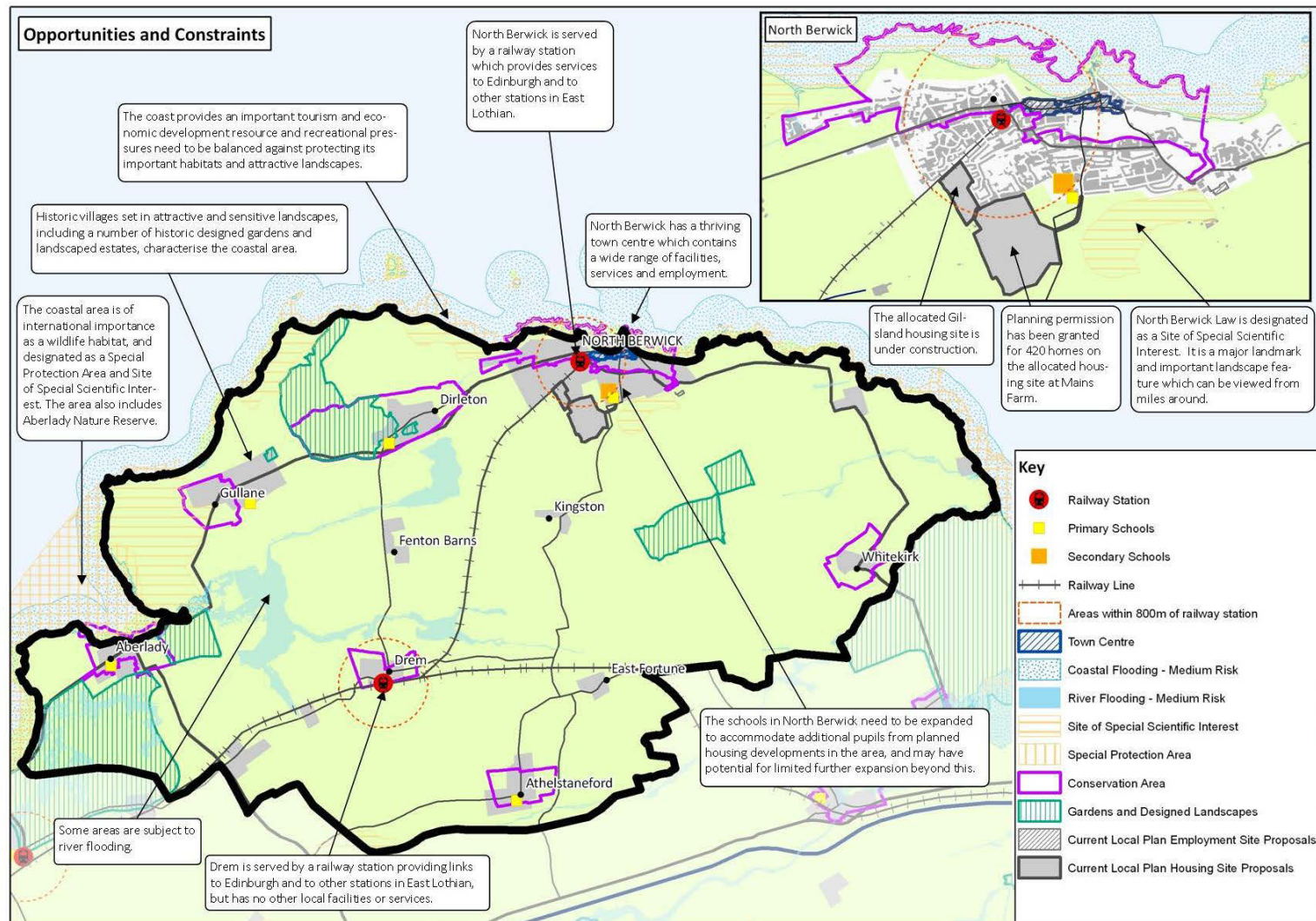
Do you have any other comments on the Dunbar cluster area?

The North Berwick Cluster

- 6.84** With the exception of Drem, the North Berwick area, including settlements such as Aberlady, Dirleton and Gullane, is not within the East Lothian SDA. Consequently, in view of this, and because the area is to the east of East Lothian, it should not be a focus for additional strategic sites at this stage.
- 6.85** However, sites outwith the SDA may be considered to help meet the East Lothian housing land requirement and to help provide a range of sites of different types and sizes in different locations in order to maintain a five year effective housing land supply at all times. In such circumstances, such housing sites may be identified if they are appropriate ones and if they would help to maintain a five year housing land supply, consistent with SDP Policy 7.

Countryside Around Towns

- 6.86** In terms of the setting of North Berwick, some separation between North Berwick Law and the southern urban edge of the town should be retained, reflecting the recreational value of the Law, that it is a local landmark, and that parts of it are designated as a Scheduled Monument and as a Site of Special Scientific Interest. This opportunity is particularly relevant in view of the large area of landscape parkland to be provided to the south of the nearby Mains Farm development. This, in combination with the existing open land around the Law and associated network of core paths and rights of way, presents an opportunity to promote an extended open area with recreational value south of North Berwick and around North Berwick Law. The eastern approach to North Berwick includes coastal and countryside views, including of the Law, that are part of the landscape setting of the town. As such, Countryside Around Town designations may be considered in these locations. The coastal villages of Aberlady, Dirleton and Gullane have their own unique character and landscape setting and also merit consideration for Countryside Around Towns designation for the most sensitive parts of their landscape setting.



Preferred Economic Development Opportunities (subject to infrastructure provision and mitigation)

6.87 The preferred strategy supports the retention of existing operational employment areas as well as the employment allocations of the current local plan. In addition, the following employment opportunity is also preferred at this stage:

- Approximately 9 hectares of land at Tantallon Road could be promoted for a mixed use development of housing and business land (**PREF – N2**). It must be demonstrated that the rising land on the west side of the site adjacent to the Heugh and existing operation employment area can be developed, and that development can be sensitively integrated in to the landform here. In particular, new buildings must provide an attractive approach to the town and must not be of a height that would breach the prominent ridge line which is part of the landform leading to North Berwick Law. It is expected that the housing, as a minimum, would facilitate the servicing of the business land. This is the most logical location within the town in which to secure land for business use. The amount of land to be provided for employment here will be a matter for the LDP; however, it is expected that around 33% of any mixed use land allocation here to be used for business.

Preferred housing opportunities (subject to infrastructure provision and mitigation)

6.88 The strategy supports the delivery of existing strategic housing land allocations as well as the other smaller scale housing commitments that form part of the established housing land supply. In particular, there is continued support for the existing strategic sites at Mains Farm and at Gilsland (circa 540 homes). However, the built development footprint approved at Mains Farm is the maximum southern extent of development that is supported here to retain the landscape setting of the settlement and North Berwick Law. It is here where there may be merit in considering a Countryside Around Town Designation. In addition to existing sites the following sites are preferred as new housing sites at this stage.

Table 23: North Berwick Cluster - Existing Housing Supply & Preferred New Housing Opportunities							
Site Ref		2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
	Existing Supply	449	307	0	756	756	
	Expand Existing Sites						
	None	0	0	0	0		
	New Allocations						
PREF-N2	Tantallon Road	75	25	0	100		The land at Tantallon Road on the eastern edge of North Berwick is a preferred land release, subject to education capacity and access. The site is adjacent to an existing employment area and a mixed use proposal could be promoted here, comprising circa 100 homes, employment and some commercial uses. The housing development should be used to enable the servicing of additional employment / commercial land. However, there are issues in terms of site access which must be resolved, particularly in respect of employment land. Landscape impact and impacts on the setting of the settlement and on North Berwick Law are key considerations. Law Primary School is to be expanded to accommodate the pupils from existing housing commitments. There is very limited capacity to accommodate additional housing as the expanded primary school will be contained by a

Table 23: North Berwick Cluster - Existing Housing Supply & Preferred New Housing Opportunities

Site Ref		2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
							realignment of Haddington Road. North Berwick High School is capable of further expansion beyond that needed for current commitments, but this is subject to securing additional campus land from an area safeguarded in the current local plan. Education capacity would need to be provided. A masterplan would be required.
PREF-N5	Fire Service College (Gullane)	75	25	0	100		The closure of the Gullane Fire Training School presents a brownfield redevelopment opportunity, suitable in principle for a mix of housing (circa 100 homes), employment uses and tourism uses. Any housing development here would be subject to education capacity and access. A vehicular route between the C111 and Muirfield Drive must be provided. A masterplan for the site would be required.
PREF-N8	Saltcoats (Gullane)	75	75	0	150		Land at Saltcoats Gullane is a preferred land release, subject to education capacity. The land could be promoted for approximately 150 houses on the south side of Gullane. Development of this land would allow for a logical southern expansion of the settlement, and potentially provision of expanded education and open space facilities. Development here would mirror the settlement pattern to the north of High Street, and provide new housing adjacent to the existing primary school. Access may be taken from the east of the site, and pedestrian links provided from the site's northern boundary to the existing urban area, including to the primary school. Appropriate structural landscape planting and open space provision would be required to integrate this site with the surroundings and to provide a setting for the settlement. A masterplan for the site would be required.
PREF-N4	Castlemains (Dirleton)	30	0	0	30		Land at Castlemains Place Dirleton is a preferred land release, subject to education capacity. The site could be promoted for the

Table 23: North Berwick Cluster - Existing Housing Supply & Preferred New Housing Opportunities

Site Ref		2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
							development of approximately 30 homes. Access may be provided from Castle Mains Place, and will not be permitted from Station Road. While this area is open, is part of the setting of the settlement and provides for open views to Dirleton castle on approach to the settlement, a section of the site to the north may be developed without harming these characteristics. Appropriate design and landscape planting and open space provision would be required to integrate this site with the surroundings and to provide a setting for the settlement, including the retention of views to Dirleton Castle. A masterplan for the site would be required.
PREF-N9	Aberlady West	75	25	0	100		Aberlady West is a preferred land release. The allocation of the site for approximately 100 homes could be supported, subject to education capacity and access. A prerequisite of this proposal would be to provide a new link road though the land to connect Kirk Road with the A198, utilising the exiting priority junction at The Pleasance to avoid traffic passing the primary school from the new housing area. This would also minimise the disruption to trees along the roadside boundary, which are an important part of the character of the coastal route and the approach to the settlement. Structural landscape planting would be required to help integrate development with the surroundings. A masterplan for the site would be required.
	<i>Sub Total</i>	<i>330</i>	<i>150</i>	<i>0</i>	<i>480</i>	<i>480</i>	
	Totals	779	457	0	1236	1,236	

Reasonable Alternative Sites & Other Site Options

6.89 At this stage the following sites may be reasonable alternative development opportunities or other site options.

Site Ref	Site Name	Comments
ALT-N1	Ferrygate	Land at Ferrygate may represent a reasonable alternative development opportunity, subject to education capacity. The site may be promoted for approximately 200 homes. Access can be taken from the A198, but suitable pedestrian routes to school and the rail halt would need to be provided. Law Primary School is to be expanded to accommodate the pupils from existing housing commitments. There is very limited capacity to accommodate additional housing as the expanded primary school will be contained by a realignment of Haddington Road. North Berwick High School is capable of further expansion beyond that needed for current commitments, but this is subject to securing additional campus land. Landscape impact and impacts on the setting of the settlement and conservation area are also key considerations, but structural planting does exist to the west of the site.
ALT-N3	Foreshot Terrace (Dirleton)	The land at Foreshot Terrace Dirleton may represent a reasonable alternative development opportunity, subject to education capacity. It is well screened by trees from the road to the south though would encroach northwards into open countryside. It is within the Conservation Area and its impact on the character of the village would be a key consideration. Access may be possible from Ware Road but the ability to achieve adequate visibility splays is uncertain.
ALT-N7	Fentoun Gait South (Gullane)	Land at Fentoun Gait South to the east of Gullane may be an alternative development opportunity, subject to education capacity. This site would be a continuation of the existing development, set back from the Greywalls key view corridor (see below). Access issues would need to be resolved and structural landscape planting would be required to help integrate development with the surroundings.
ALT-N6	Fentoun Gait East (Gullane)	The land at Fentoun Gait East may be an alternative development opportunity, subject to education capacity. However, the land is important to the setting of the settlement, and is also located to the south of Greywalls Garden and Designed Landscape and a number of Category A listed buildings. Open views southwards from these gardens and buildings over the site and across to the Garleton Hills and Lammermuirs were intentionally framed to form their principal vistas. Some very limited development of housing on land to the south of the A198 might be possible. This may only be the case if it were a continuation of the existing housing to the west, and if were to align with the existing settlement edge to the north of the A198. It may be that this could be achieved without significantly affecting views from Greywalls southwards and the settings of the listed buildings and garden and designed landscape. However, access to the site is unlikely to be achievable in an acceptable manner. Structural landscape planting would be required to help integrate development with the surroundings.
ALT-N10	Aberlady East	Land at Aberlady East may be an alternative development opportunity, subject to education capacity. However, this site is sensitive in landscape terms, and is within the Conservation Area and is visible in long distance views from the Garleton Hills towards the coastal Area of Great Landscape Value. The site is also nearby the Aberlady Bay Local Nature Reserve and the SPA, and there may be natural heritage issues.

		Access may be achieved from Haddington Road, but junction spacing could be an issue. There is a TPO at the northern site boundary and nearby listed buildings, designed landscapes and scheduled monuments. Traffic may also route through the village if travelling west. Structural landscape planting would be required to help integrate development with the surroundings.
OTH-N11	Potential Drem Expansion Area of Search	Drem benefits from a railway station on the East Coast Main Line, though this is served only by trains from the North Berwick branch line. It has very limited public transport accessibility by other modes, and no other facilities. The road network through Drem is also inadequate to support a significant scale of growth. However, together with the area of employment uses at Fenton Barns to the north, this general location may present an opportunity for a significant urban expansion in the medium to long term, should one be required to meet future housing requirements. The area is relatively free from statutory designations and other constraints although it does form part of the main Pink Footed Geese feeding area. Drem and the land to its north and east is a conservation area. There are also areas of flood risk and a gas pipeline runs close to the eastern edge of Fenton Barns. If a major development were to be promoted here there are broadly two options: 1) to make it of a size that would be able to support a new primary school at circa 1000 homes, or 2) to make it of a size that would support a new secondary school at circa 5000 - 6000 homes. In the case of the former it is unlikely that such a scale of growth would support a reasonable range of local amenities and facilities; this would likely require a scale of growth equivalent to that needed to support a new secondary school.

Infrastructure issues

Secondary education

6.90 North Berwick High has some expansion potential, but additional campus land would be required to secure this. However, whilst land is safeguarded in the current local plan that would allow for this, it is not currently in the Council's control. This land safeguard will be continued by the LDP.

Primary education

6.91 Some capacity/expansion potential exists at all primary schools within this cluster with the exception of Dirleton and Athelstaneford. The current local plan allocates/safeguards land for any required expansion of Law Primary School campus and this should also be continued; however, this expansion is intended only to provide capacity for existing commitments, and the school may not be able to expand further.

Transportation

6.92 North Berwick experiences significant visitor numbers, particularly during summer months and traffic and parking management measures are being

considered in relation to this. However, the most significant issue is the impact that additional development in the area would have on the local road network. A number of these roads also provide access to and through coastal and inland settlements. The impact of through traffic is a related concern.

Water and Drainage

6.93 In North Berwick drainage capacity is a significant constraint on further development / strategic development beyond existing commitments and its foul drainage catchment area, which includes Dirleton. While it may be technically possible to overcome this constraint there is likely to be a considerable funding requirement and lead-in timescale to secure the delivery of solutions that would allow consideration of any further significant development in this area.

Mitigation

6.94 Mitigation requirements will include:

1. Delivery of the green network, including woodland planting, active travel routes and habitat networks;
2. Trunk and local road impacts, including at Old Craighall, arising as a result of the cumulative impact of development including that within East Lothian;
3. Noise impacts and the visual impacts of mitigation requirements arising from increased vehicle flows, the rail network and noise from adjoining land uses will need to be taken into account;
4. Traffic and parking management could be considered as measures to ease vehicle flows;
5. Education capacity constraints would need to be overcome;
6. Foul drainage constraints would need to be overcome;
7. Identification of any ground conditions constraints and methods of mitigation;
8. Comprehensive masterplans would be required.

Those parties promoting development sites in this area must work together and with the Council to demonstrate to its satisfaction that the above issues can be satisfactorily addressed and associated mitigation delivered so sites are / can be made effective before they may be included in a Proposed LDP. It is expected that developer contributions will have a significant role to play in securing mitigation as appropriate.

Key Messages: North Berwick Cluster

At this stage the preferred development opportunities in the North Berwick cluster could deliver approximately **1,230 additional homes and 3ha of employment land** over the period to 2024 and beyond. North Berwick is accessible, including by public transport, but less so than the main settlements in the SDA. North Berwick does however have a rail halt. The cumulative impact of additional development on the transport network, including at Old Craighall junction, is an issue that needs to be resolved. The area is in demand as a place to live, but fewer homes are sold here than in locations further west. The North Berwick cluster offers some potential for job creation, and an expansion of an existing operational employment area is proposed in association with housing development. Solutions for additional strategic water and drainage capacity, and the very significant investment required to increase this, will be required to accommodate additional strategic development / development beyond current commitments and this is unlikely to be resolved in the short term. The preferred mixed use housing and employment site at Tantallon Road North Berwick may be accommodated through a further modest expansion of Law Primary School if possible once expanded. Elsewhere in the cluster, primary education capacity may be provided to accommodate preferred housing opportunities at Dirlerton, Gullane and Aberlady. North Berwick High School is able to expand further to accommodate current commitments and the preferred housing sites in its catchment. However, to achieve this additional campus land may be required from the area safeguarded for this in the adjacent Mains Farm site, as may the relocation and reprovision of an existing synthetic sports pitch within the current campus of the school. Although North Berwick and the coastal settlements in this cluster are not in the SDA, by virtue of a rail halt on the North Berwick Branch Line, the small scale settlement of Drem is within the SDA. However, Drem has very limited public transport accessibility by other modes, and no community facilities; it is also not within the west of the SDA. The road network through the settlement is also inadequate to support a significant scale of growth. However, together with the area of mixed uses at Fenton Barns to the north, this general location may present an option for a significant urban expansion in the medium to long term, should this be required to meet any future housing requirements for East Lothian, such as any set out in any review of the current SDP. The area is relatively free from statutory designations and other constraints, although there is a conservation area designation around Drem and the wider area forms part of the main Pink Footed Geese feeding area. There are areas of flood risk and a gas pipeline runs close to the eastern edge of Fenton Barns. If a major new development were to be promoted here there are broadly two options for this: 1) to make it of a size that would be able to support a new primary school at circa 1,000 homes, or 2) to make it of a size that would support a new secondary school at circa 5,000 homes. In the case of the former it is unlikely that such a scale of growth would support a reasonable range of local amenities / facilities; rather, to achieve this would likely require a scale of growth equivalent to that needed to support a new secondary school.

Question 16: North Berwick Cluster

Do you support the preferred approach to new economic development and housing opportunities in the North Berwick cluster?

Do you think that all of the preferred housing sites can be delivered in the anticipated timeframe? Please explain why.

Potential options have been identified for how education capacity might be increased in the cluster. How do you think those options could be funded and delivered?

Where might any new education facilities be located if required?

Please indicate if you support or oppose particular preferred sites, reasonable alternative sites, or other site options, and explain why?

If you do not support the preferred sites, please indicate what alternative sites you would suggest?

Do you have any other comments on the North Berwick cluster area?

BLINDWELLS NEW SETTLEMENT

Blindwells New Settlement

- 6.95** The SDP confirms an ongoing commitment to Blindwells as a location for a new settlement during the SDP period and beyond. Development of the land at Blindwells subject to the current local plan proposal provides an opportunity to make good use of previously developed land with degraded landscape character. A west to east phasing of development at the current allocation is required. It benefits from direct access to the strategic road network and the location is well served by public transport with potential to improve this in future. The amount of development that can be delivered at the existing allocated site during the plan period is largely dependent on how long it will take to remediate the land.
- 6.96** Importantly, the Blindwells location is within the SDA. There is potential for a significant expansion beyond the eastern boundary of the current allocation onto other previously developed land, and beyond this onto greenfield land. Prioritising the redevelopment of land is a justification for continuing to support a west to east phasing of development should Blindwells be able to expand. If capable of expansion, Blindwells could help accommodate a significant amount of any future growth directed to East Lothian. This may help minimise any need to direct further significant strategic development to existing settlements, some of which are nearing the limit of expansion beyond which significant changes to their landscape setting, character and infrastructure would be required. These are important justifications for selecting the Blindwells location for development and for considering its development potential into the longer term.
- 6.97** In these circumstances SPP allows new settlements to be promoted over the further expansion of existing ones³⁸. Accordingly, 'The Blindwells Expansion Area of Search' is shown on the plan on page 158 below. It is within this general area where the scope to expand Blindwells will be tested through this MIR consultation. Importantly, during the 'call for sites' exercise not all of the landowners in this area of search suggested to the Council that they are willing to make their land available for development. This may constrain some land within 'The Blindwells Expansion Area of Search' from being considered effective and compromise the ability to find comprehensive solutions for the development of a single larger new settlement using this entire area, as would be required by the SDP. Whilst it may be that the outcome of the MIR testing is that all of the land to the east of the existing Blindwells allocation shown in 'The Blindwells Expansion Area of Search' could feature in any expansion of the new settlement, it may be that only some of that land should be used for this purpose, or even that Blindwells should not grow any larger than the existing allocation.
- 6.98** A confirmed ability to expand Blindwells would provide a number of important opportunities for East Lothian. One of these would be for a new town centre to be provided at Blindwells of a size that may also serve surrounding communities. This could help regenerate nearby settlements whose

³⁸ Scottish Government SPP paragraph 53 - 54

economic base has declined and which have limited scope for further expansion. Located in the highly accessible western part of East Lothian, where most of the area's population is, Blindwells is also a logical location to promote employment and inward investment opportunities. Provision of new jobs, community services as well as potentially further education facilities here would improve the availability and proximity of these amenities to the rest of East Lothian's communities. This could also help reduce the need to travel as well as travel distances and related CO₂ emissions.

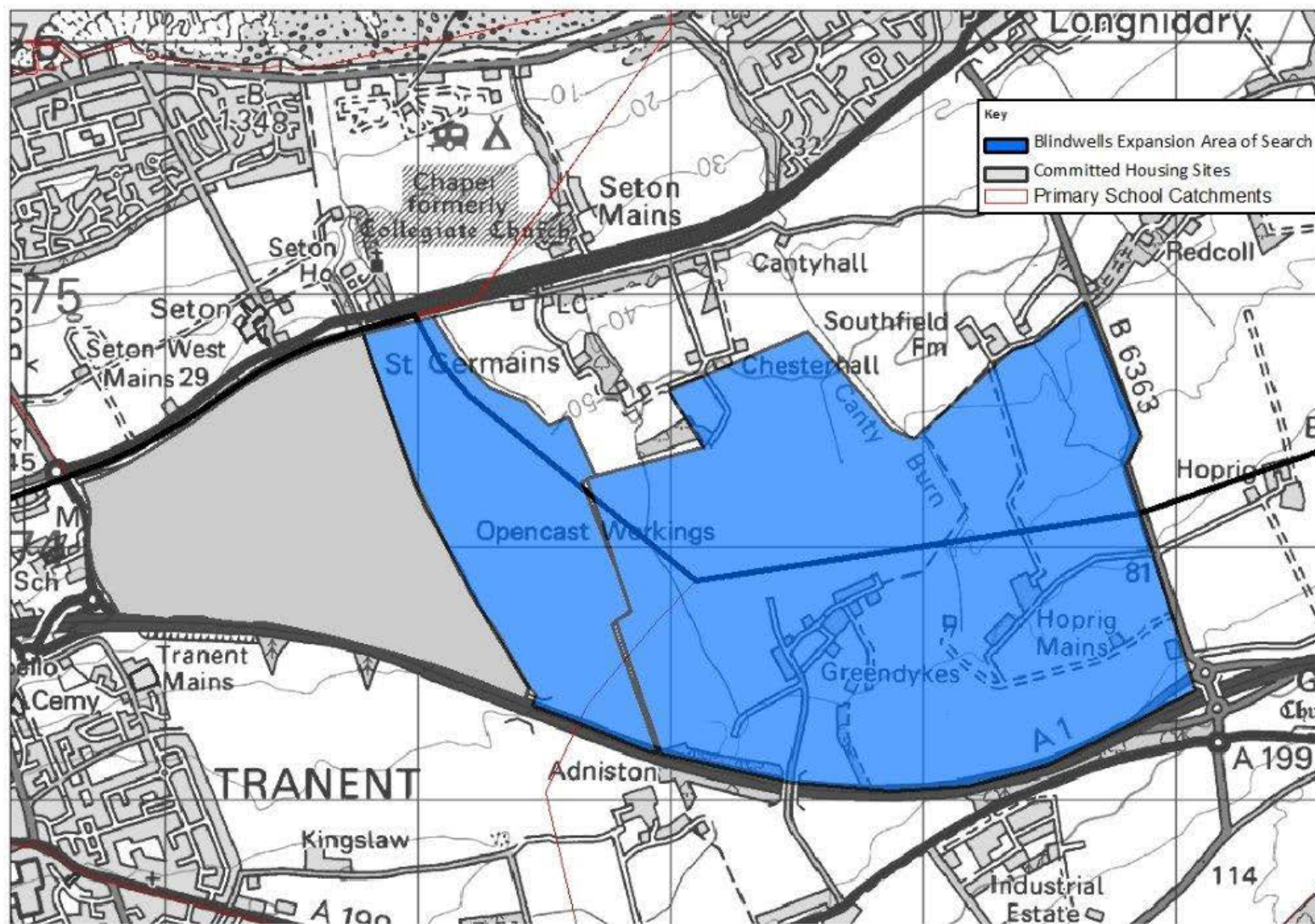
- 6.99** However, the SDP's approach to any expansion of Blindwells is that this is predicated on comprehensive solutions being found that will deliver the entire new settlement - i.e. a single new settlement, not a sequence of separate ones – and that these solutions are to be confirmed before any additional land there can be allocated. Specifically, this is to avoid any need for the LDP to support any sub-optimal solution(s) for the delivery of the new settlement, even if more housing completions might be achieved earlier than with a continued west to east phasing of development. This is why the SDP 'signposts' a vision for a larger new settlement at Blindwells, but does not require this to be delivered.
- 6.100** The implication of not being able to achieve early house completions at Blindwells will likely be a need to identify greenfield land for new housing at existing settlements. Without a clear and agreed strategy for how a single larger settlement could be delivered at Blindwells, the current SDP would expect the expansion of existing settlements to be prioritised over a separate stand alone development to the east of the current Blindwells allocation. The possible policy approaches to expanding Blindwells are discussed in the following sub-sections.
- 6.101** In terms of the provision of education capacity for the new settlement, the options for the provision of secondary education capacity for Blindwells are as follows:
- a. A new secondary school is provided on-site for the first occupancy of dwellings at the site; or
 - b. Preston Lodge High School is used to accommodate the pupils from the current allocation, and if the settlement grows beyond the current allocation a new secondary school would be provided in association with any subsequent phases of expansion;
 - c. If the settlement does not expand beyond the current allocation, and if b) is followed, then a new secondary school may not be required at this site.
- 6.102** In terms of the provision of primary education capacity, up to 4 new primary schools may be needed at Blindwells depending on if and how the new settlement grows. The options for the provision of primary education capacity for Blindwells are as follows:
- a. A new primary school is provided on-site for the first occupancy of dwellings at the site;

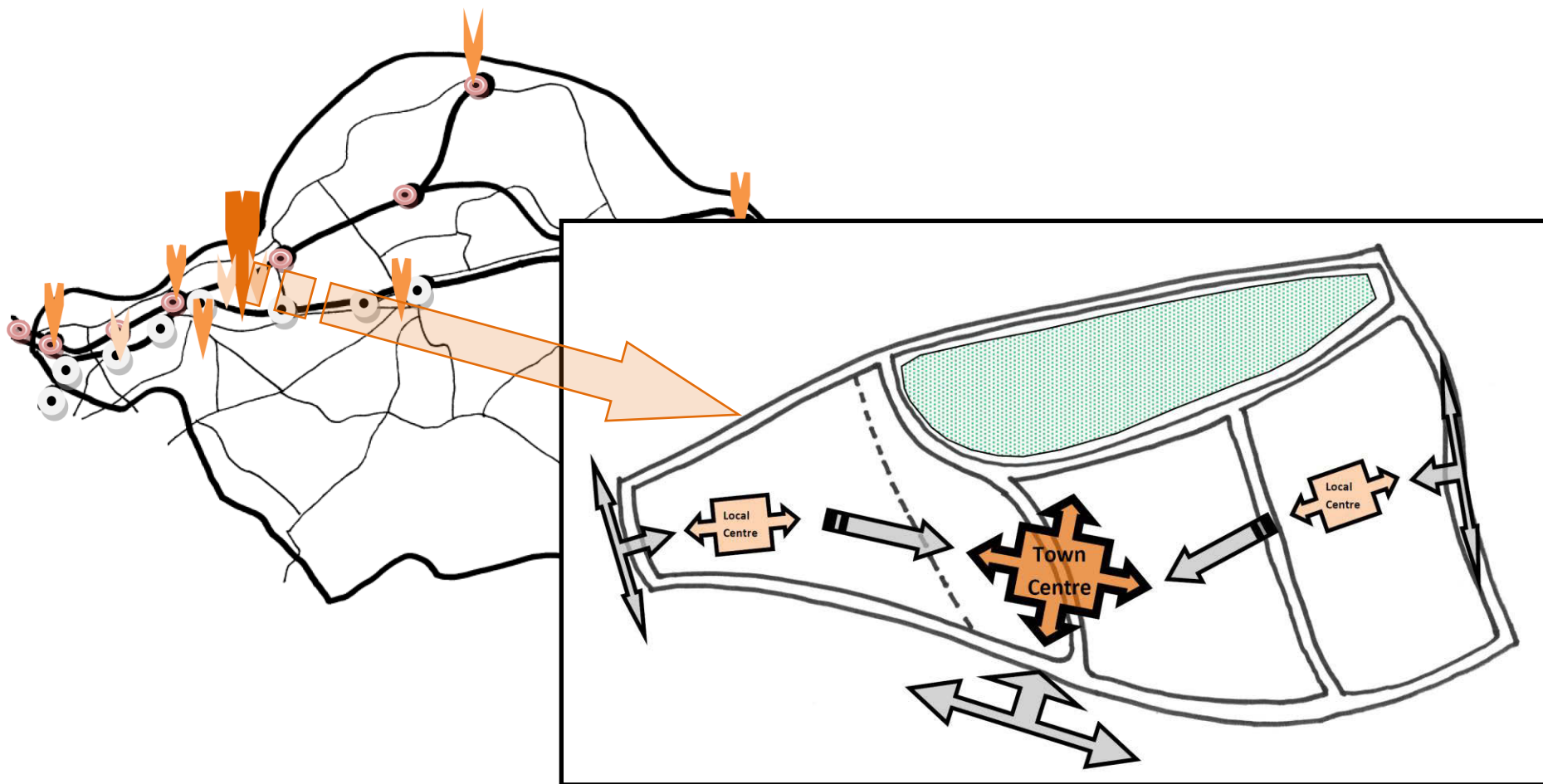
- b. Cockenzie Primary School could be used to provide temporary primary education solution before a new primary school is provided at Blindwells once a viable pupil roll has developed. Once the primary school is in place at the site:
 - i) If 1,600 homes are to be delivered at Blindwells 1 new primary would be needed. It should feed Preston Lodge High School. This would become the final primary solution for Blindwells new settlement;
 - ii) If Blindwells is to grow beyond 1,600 homes, perhaps to 3,500 - 6,000+ homes in to the much longer term, then 2 – 4 new primary schools may be needed to support the relevant amount of housing development. A new secondary school cluster at Blindwells may be created for this.

6.103 If Blindwells were to grow beyond 1,600 homes at this stage the preferred spatial strategy to support the delivery of new education facilities at the site would be to follow the existing (and currently required) west to east phasing of the development:

Phase 1: Utilise the approach set out at (a or b) above for the first 1,600 homes; then

Phase 2/3: for the second and any third phase of expansion provide a new secondary school and primary school(s) in the middle of the Blindwells Development Area, and if required another primary school to the east.



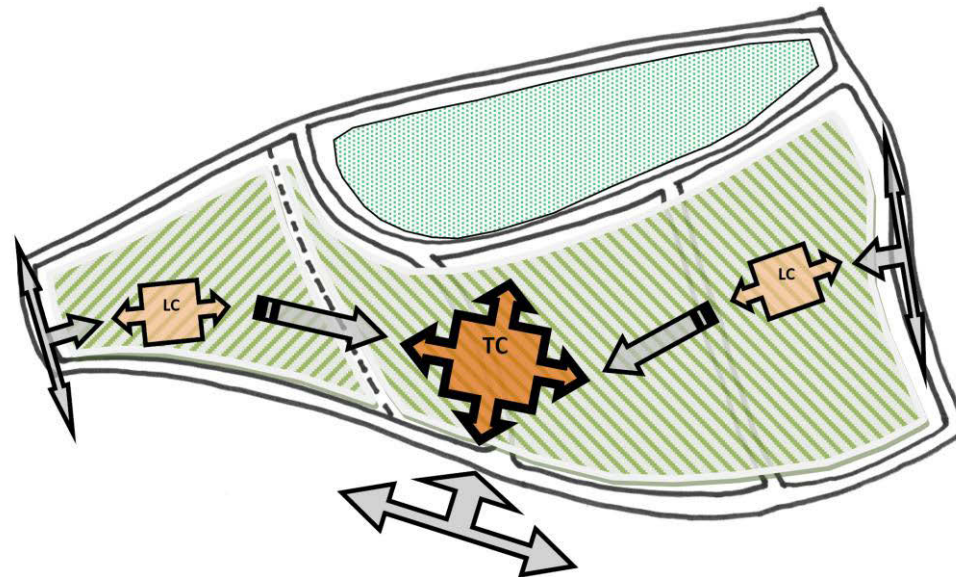


Blindwells - Potential Policy Approaches for the LDP

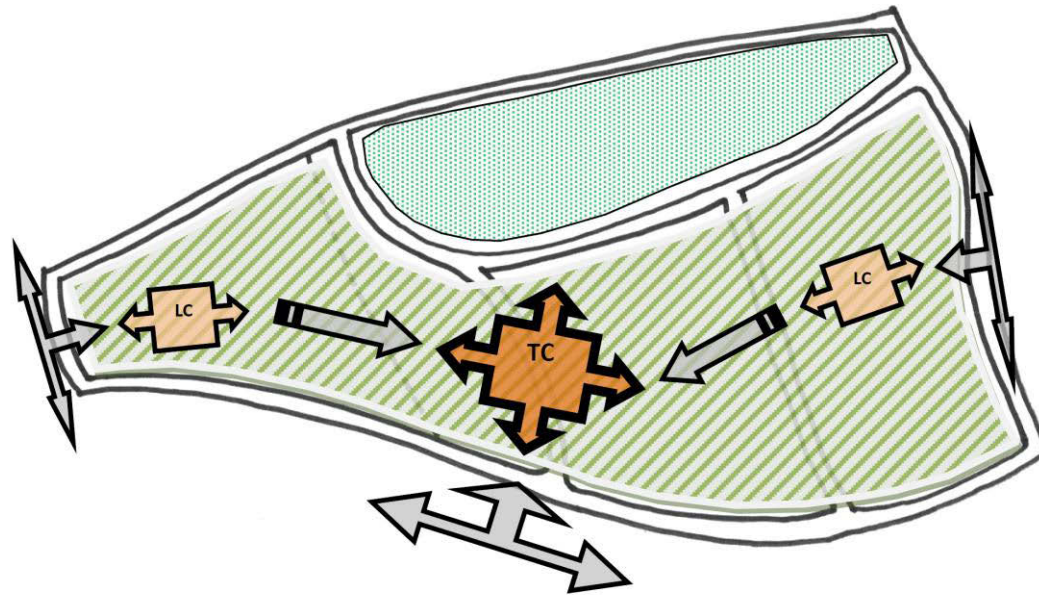
A comprehensive solution is found for the LDP

6.104 The current local plan proposal and its associated Development Framework require solutions to be found for the development of the existing allocated site which are not dependent on and would not prejudice a further expansion of the new settlement. To conform to the approved SDP, and to allow for the transition between the current Development Plan position and any new Development Plan position coming into force, **comprehensive solutions** for the development of a single larger new settlement at Blindwells may be found in the following two ways:

- a. If planning permission is approved for the area of the current local plan proposal prior to the adoption of the LDP, any proposal promoted by the LDP for any expansion of the new settlement beyond the current allocation must be able to complement and be compatible with the planning permission approved for the area of the current local plan proposal;



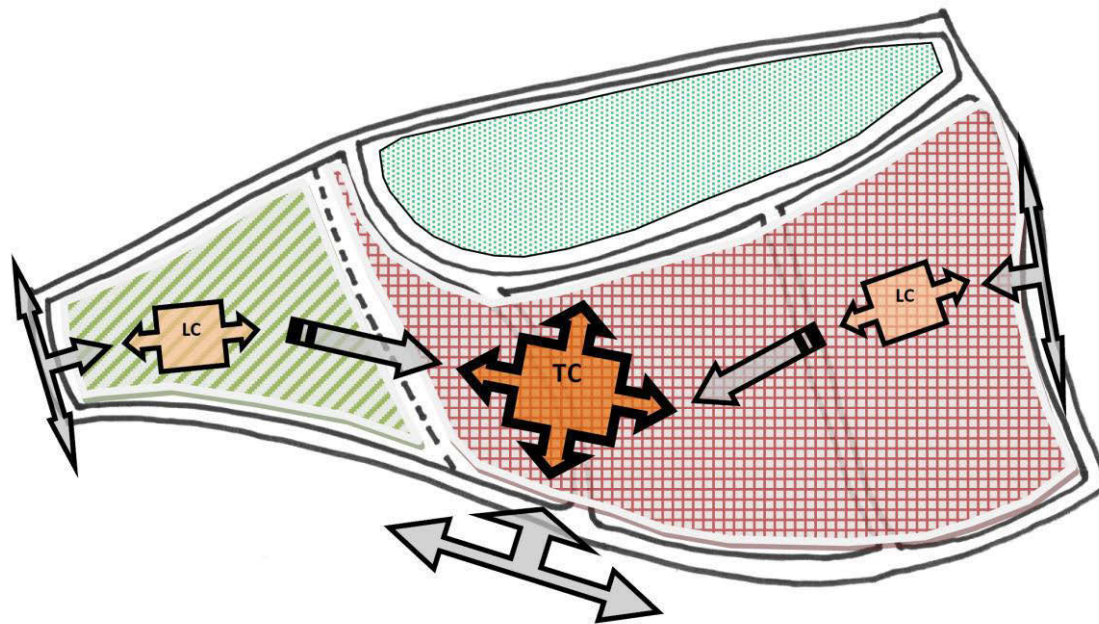
- b. If no planning permission exists for the area of the current local plan proposal at the point the LDP is adopted, a single proposal must be brought forward as a consolidated solution for all of the land which may be allocated as a Blindwells Development Area.



6.105 The current local plan would allow planning permission to be approved for the existing allocated site until the LDP is adopted. However, if no such permission exists at the time the LDP is adopted, the LDP will require a single comprehensive solution for all of the land allocated as the Blindwells Development Area. The development principles for the area of land subject to the current local plan proposal would be reviewed and the associated land included as part of any wider Blindwells Development Area to be allocated by the LDP.

A Comprehensive solution is not found for the LDP

6.106 If planning permission is approved for the land subject to the current local plan proposal before the LDP is adopted, but solutions are not specified by the LDP that would allow a complementary form of development to be delivered on any part of The Blindwells Expansion Area of Search, the LDP would safeguard all or part of that area of search so as not to prejudice any future expansion of the new settlement.

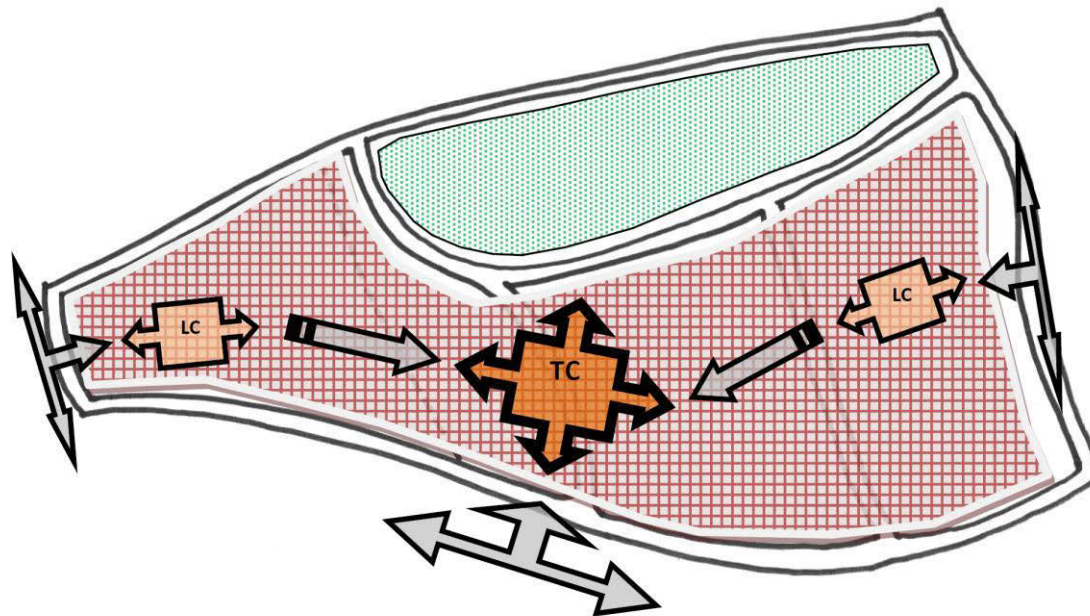


6.107 Such a safeguard would be required in order to prevent development taking place that would compromise the ability to expand the new settlement and also to allow SESplan to take a view on the extent to which any expansion of Blindwells should feature as part of any future SDP spatial strategy. An important consideration for SESplan will be the planning status of the land subject to the current local plan proposal and if an expansion of Blindwells continues to be a potential opportunity – i.e. if comprehensive and deliverable solutions have been found.

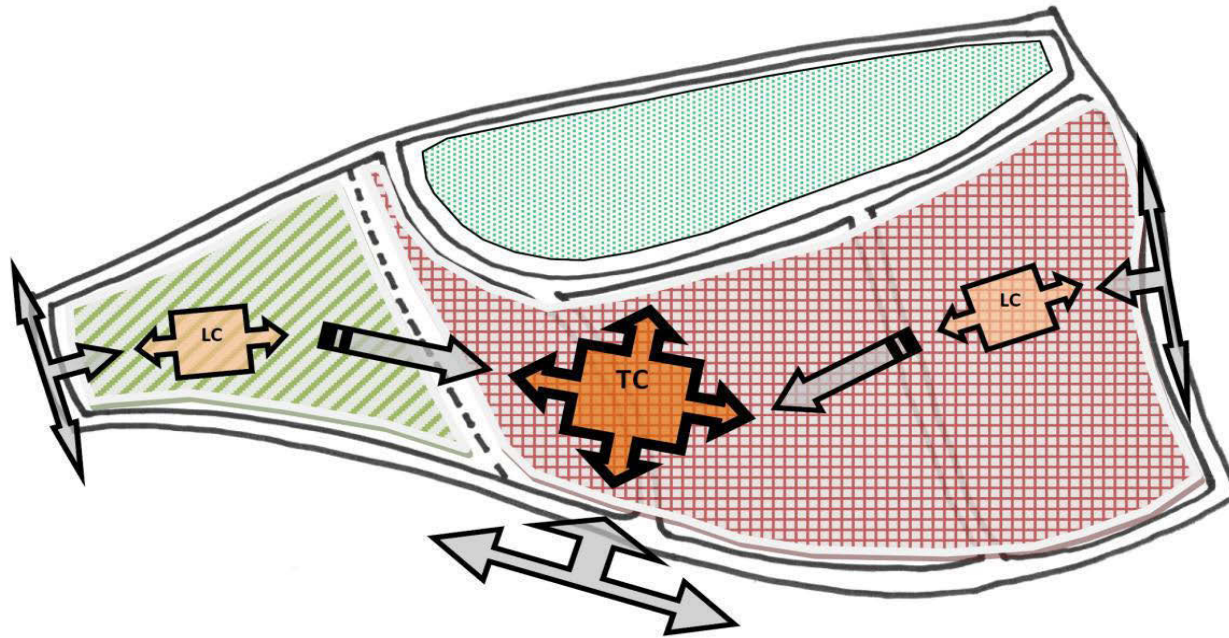
Finding a comprehensive solution whilst the LDP is operative

6.108 If a comprehensive solution cannot be specified by the LDP, it could continue to seek one whilst the LDP is operative. The LDP would be used to influence how that solution is found and confirmed as policy by the Council. Supplementary Guidance could be prepared and adopted by the Council after the LDP is adopted for this purpose. It would reflect whether or not planning permission has or has not been approved for the current local plan allocation. Development at Blindwells does not need to commence until post 2019 – i.e. after the review of the emerging LDP – so there is time for such Supplementary Guidance to be prepared. In these circumstances there are two approaches which may be followed:

1. if planning permission is not approved for the current allocation before the LDP is adopted, a Blindwells Development Area will be safeguarded for the development of the new settlement:

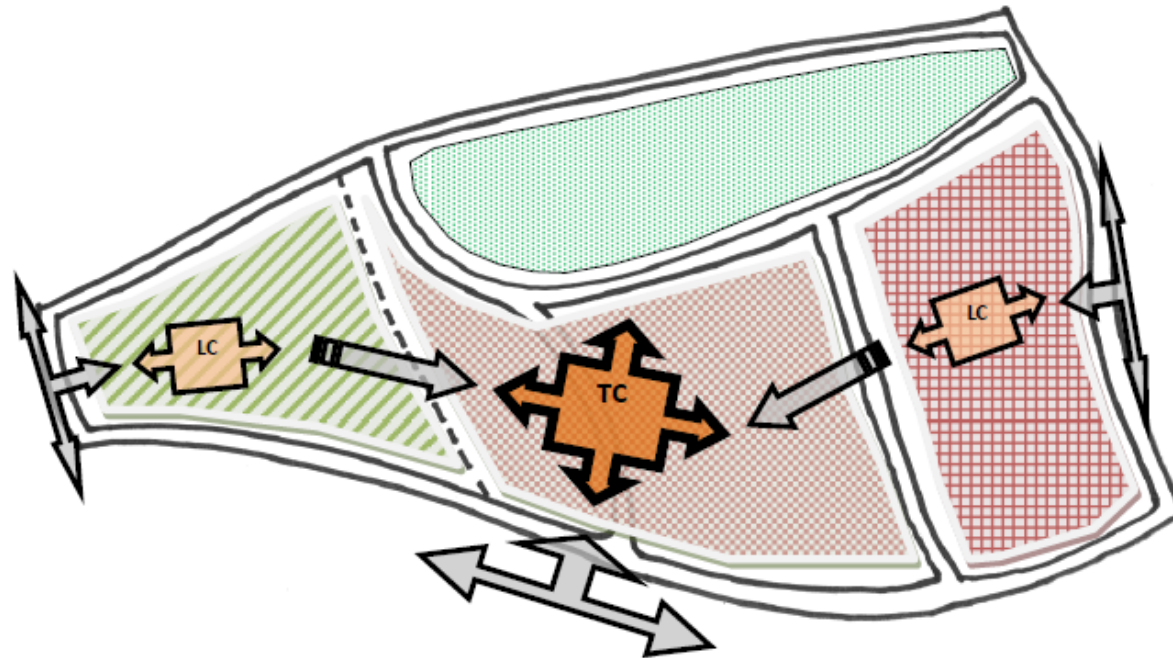


2. if planning permission for the current allocation is approved before the LDP is adopted, the safeguard would relate to a Blindwells Expansion Area of Search.

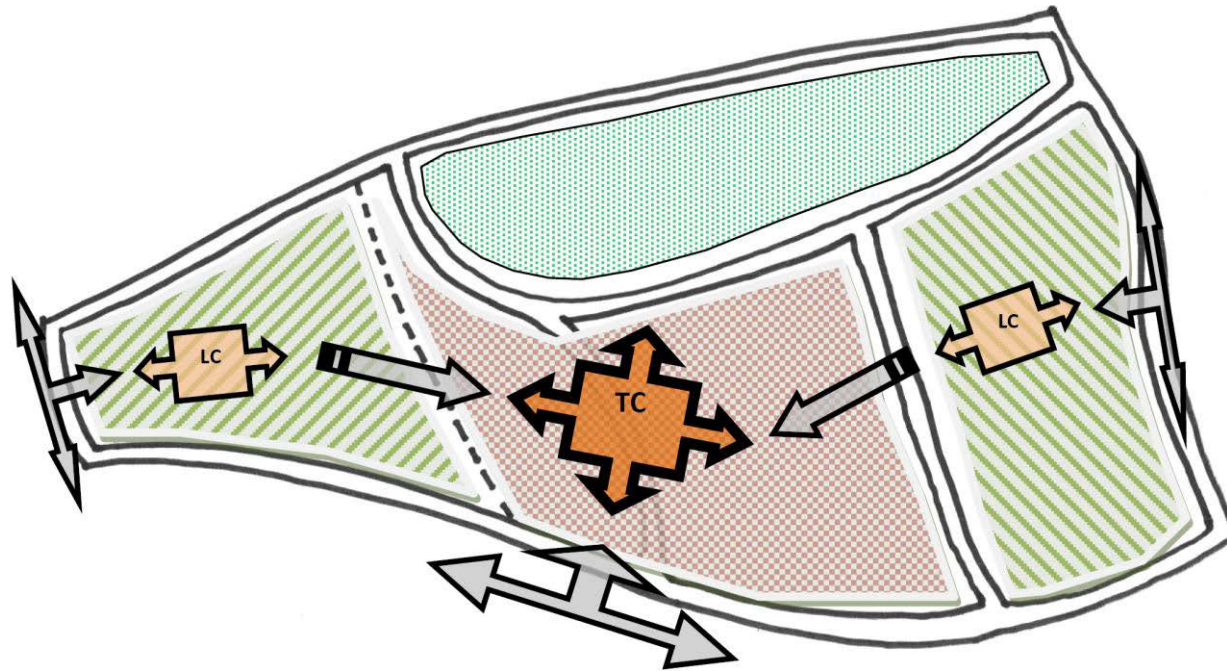


The safeguard could be lifted, potentially in phases, if and when Supplementary Guidance for the expansion of the new settlement is adopted by the Council. The sequence in which the safeguard could be lifted would depend on the nature of the solutions that are found in the preparation of the Supplementary Guidance – e.g.

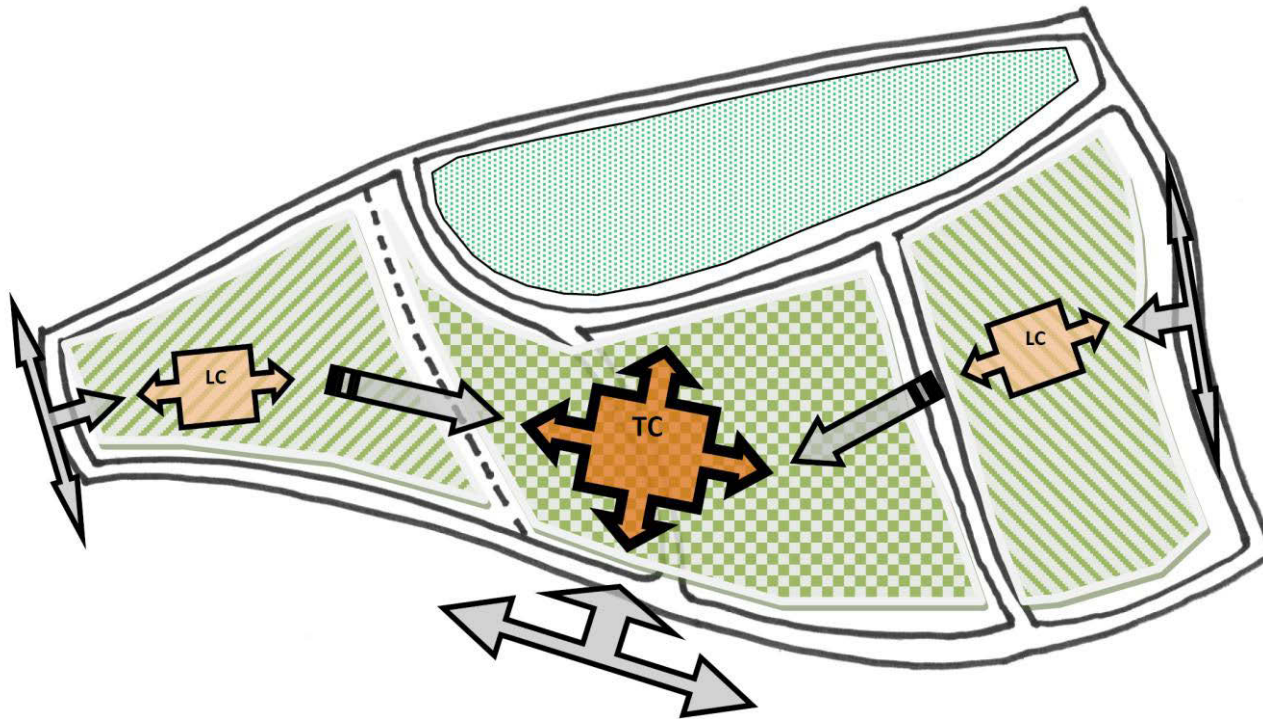
The safeguard could be lifted sequentially from west to east as a continuation of the current phasing approach, with each phase complementing and being compatible with the preceding phase:



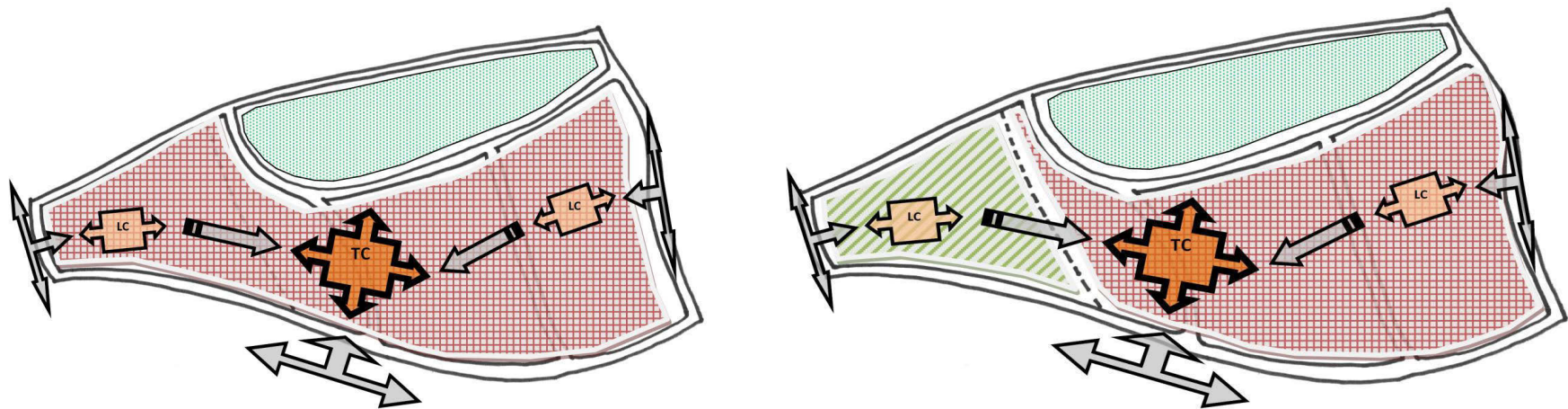
the safeguard could be lifted from both ends of the site, **if it is proven and agreed that the area in middle can and will be developed as part of a single comprehensive solution** but matters such as provision of access might delay this and other infrastructure issues can be satisfactorily resolved, including the provision of education capacity and facilities:



the safeguard could be lifted from all areas at once if matters such as the provision of access and other infrastructure issues could be satisfactorily resolved to allow for the early development of all areas simultaneously as part of a single comprehensive solution:



6.109 However, if the LDP and / or Supplementary Guidance can not specify how Blindwells could be expanded, a safeguard will be required over all (or over part of the land if planning permission is approved for the current allocation before the LDP is adopted) to manage an appropriate phasing of development and / or to manage an appropriate outcome in relation to Blindwells through time and the development plan review process. In these circumstances the need for a safeguard will be reviewed with the LDP.



6.110 If comprehensive solutions are not found SESplan will review the contribution that this location is expected to make to the SDP spatial strategy. For the clear avoidance of doubt, if comprehensive solutions are not found in a reasonable timeframe, SESplan may take the view that the Blindwells concept need be deleted either in whole or part from the SDP's spatial strategy. The preference is therefore to find comprehensive solutions for a larger Blindwells new settlement in the preparation of the LDP.

Table 25: Blindwells New Settlement

<p>Preferred Approach</p>	<p>If comprehensive solutions for the development of the entire new settlement <u>are</u> specified in principle by the LDP, including the means of and timescales for remediating ground conditions, the scale and nature of and delivery mechanisms for community facilities and all other infrastructure, including the means of access to and across the entire Blindwells Development Area, and the appropriate phasing of that provision for the entire new settlement, the following approach is preferred:</p> <ol style="list-style-type: none"> 1) The approach would require to be delivered through a single planning application accompanied by a single masterplan framework and a single Section 75 agreement that relates to all of the land identified as the Blindwells Development Area, unless planning permission is approved for the area of the current local plan proposal prior to the adoption of the LDP; 2) If planning permission is approved for the area of the current local plan proposal prior to the adoption of the LDP, a single planning application accompanied by a single masterplan framework and a single Section 75 legal agreement would be required in respect of any identified Blindwells Expansion Area. Any proposal for the expansion area must complement any planning permission approved for the area of current local plan proposal. If both proposals are taken together they must be compatible with one another and deliver a comprehensive solution that would allow the phased delivery of the entire new settlement and its supporting infrastructure and community facilities in an appropriate way. This may require a west to east phasing of development; 3) There will be a land available for 1,600 dwellings at Blindwells up to 2032, but the possibility of land becoming available for more dwellings before 2032 will only be allowed if appropriate solutions are found; 4) If a new interchange with the A1(T) can be delivered, or the existing underpass of the A1(T) to the south can be used to provide access to the potential development area, a three way phasing strategy may be possible (from the west, centre and east), but if any of these accesses solutions are not deliverable an appropriate phasing strategy from the east and / or the west would be promoted; 5) A higher order town centre or a town centre may be promoted in the middle of the Blindwells Development Area (e.g. to the east of the land subject to the current local plan proposal) as well as potentially two local centres with one to the west and one to the east; however, this will be subject to these centres serving appropriate catchment areas to be specified by the Council and the ability to access all new centres satisfactorily from all of their intended catchment areas, including via the trunk road and local road network, as well as via public transport, walking and cycling routes. The phasing for the delivery of all centres, including any higher order one, will be directly linked to the phasing for the provision of infrastructure, including access to and across the entire new settlement. The scale of any higher order town centre is likely to be directly linked to the ability to deliver a new trunk road interchange or other access solution which would offer a suitable connection between the new settlement and existing settlements, particularly those nearby to south of the A1(T), including via public transport and active travel routes; 6) The role of the new settlement in providing any strategic employment opportunities as part of the review of the employment land supply will be specified once this review has concluded, and once the timescale for development at Blindwells is confirmed. Any new employment land to be identified at Blindwells, where it will be located and how it will be serviced on a phased basis with the development of the other land uses, including housing, should also be specified by the LDP; 7) The solutions would be detailed in Supplementary Guidance to be prepared by the Council working collaboratively with all relevant landowners in
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	<p>consultation with other relevant parties. The intention would be to publish this Supplementary Guidance alongside the Proposed LDP. Once the Supplementary Guidance is approved by the Council it would provide the basis against which a single planning application accompanied by a single masterplan framework and a single Section 75 legal agreement would be prepared, either for the entire Blindwells Development Area or, if planning permission is approved for the current local plan proposal before the LDP is adopted, for any Blindwells Expansion Area.</p> <p>Although a single application, masterplan and legal agreement for the entire new settlement is the preference, this approach allows the current local plan proposal to be developed under any associated planning permission if it is approved prior to adoption of the LDP. This approach would prevent more than a single new settlement being developed at Blindwells. It would also ensure that open countryside is not developed before previously developed land unless this is a justified part of a comprehensive solution that would ensure delivery of a single new settlement into the longer term as intended. The solutions that will deliver the entire new settlement will be specified in principle by the LDP as will an appropriate phasing of development, but these solutions would be detailed in Supplementary Guidance. This approach may allow more land to become available before 2032 if the solutions and phasing for the development area specified by the LDP and any Supplementary Guidance approved by the Council allow for this.</p>
Reasonable Alternative 1	<p>If comprehensive solutions for the development of the entire new settlement are not specified in principle by the LDP and planning permission has been approved for the area of the current local plan proposal, the following approach is a reasonable alternative:</p> <ul style="list-style-type: none"> • A Blindwells Expansion Area of Search will be safeguarded for a potential expansion of the new settlement; • The Council would continue to seek comprehensive solutions during the operation of the LDP that will deliver an expansion of the new settlement, including the means of and timescales for remediating ground conditions, the scale and nature of and delivery mechanisms for community services and facilities and all other infrastructure, including the means of access to and across the new settlement and the appropriate phasing of that provision for the entire new settlement, unless and until an SDP promotes an alternative approach; • If and when solutions are found they will be specified in Supplementary Guidance to be prepared by the Council working collaboratively with all relevant landowners and in consultation with the public and other relevant parties whilst the LDP is operative. Once adopted by the Council, the Supplementary Guidance would provide the basis against which a single planning application accompanied by a single masterplan framework and Section 75 agreement would be prepared for any Blindwells Expansion Area. • For the avoidance of doubt, any approval by Scottish Ministers of the Supplementary Guidance together with its adoption by the Council would have the effect of confirming the allocation within which an expanded Blindwells may be developed; • The LDP would continue to prioritise a west to east phasing of development; however, it may allow for an alternative phasing of development if and when comprehensive solutions are found in the preparation of Supplementary Guidance that would deliver the entire new settlement into the longer term with an appropriate alternative phasing of development; • The approach to other matters would be the same as set out in points 2 – 6 of the preferred approach, as relevant to this approach. <p>Although a single application, masterplan and legal agreement for the entire new settlement is the preference, this approach allows the current local plan</p>

	<p>proposal to be developed under any associated planning permission if it is approved prior to the adoption of the LDP. It would also prevent more than a single new settlement being developed at Blindwells and open countryside from being used separately from the previously developed land. If solutions are found for the phased expansion of Blindwells at different times, this approach allows the settlement to be expanded on an appropriate phased basis using Supplementary Guidance to direct the approach. It may also allow more housing land to become available before 2032 because the opportunity remains to find comprehensive solutions to develop a larger new settlement faster with different areas being developed simultaneously. However, if appropriate solutions are not found, it also ensures that SESplan has the option to review the contribution that Blindwells may be able to make to the longer term settlement strategy.</p>
<p>Reasonable Alternative 2</p>	<p>If comprehensive solutions for the development of the entire new settlement <u>are not</u> specified in principle by the LDP, and planning permission <u>has not</u> been approved for the area of the current local plan proposal prior to the adoption of the LDP, the following is another reasonable alternative:</p> <ul style="list-style-type: none"> • A Blindwells Development Area of Search would be safeguarded for the development of a new settlement. This would include and be larger than the area of the current local plan proposal, which would also be reviewed; • Comprehensive solutions would continue to be sought during the operation of the LDP that will deliver a single new settlement within the safeguarded Blindwells Development Area of Search, including the means of and timescales for remediating ground conditions, the scale and nature of and delivery mechanisms for community services and facilities and all other infrastructure, including the means of access to and across the entire Blindwells Development Area of Search, and the appropriate phasing of that provision for the entire new settlement, unless and until an SDP promotes an alternative approach; • Once found, solutions will be specified in principle in a review of the Local Development Plan and / or detailed in Supplementary Guidance to be prepared by the Council working collaboratively with all relevant landowners and in consultation with the public and other relevant parties. Once approved by the Council, the Supplementary Guidance would provide the basis against which a single planning application accompanied by a single masterplan framework and Section 75 agreement would be prepared for the entire new settlement; • For the avoidance of doubt, any Supplementary Guidance would need to be approved by Scottish Ministers and adopted by the Council; • The approach to other matters will be the same as set out in points 4 - 6 of the preferred approach as relevant to this approach. <p>Whilst allowing work on comprehensive solutions to continue during the operational phase of the LDP a single planning application, masterplan framework and Section 75 legal agreement would be required for the entire new settlement under this approach. It would prevent more than a single new settlement being developed at Blindwells and open countryside from being used separately from the previously developed land. It would allow at least 10 years to deliver 1600 homes between 2019 - 2032 if solutions are found while the LDP is operative. Since the review of the LDP may be needed to confirm any revised allocation here this may prevent completions from coming forward at Blindwells before 2019. If the required solutions are not found, this approach also ensures that SESplan has the option to review the contribution that Blindwells may be expected to make to the settlement strategy, including if the concept is retained.</p>

Mitigation

6.111 Mitigation requirements will include:

1. Establishing new, long term settlement boundaries, taking in to account any new Countryside Around Town designation;
2. Delivery of the green network opportunities, including woodland planting, active travel routes and habitat networks;
3. Noise impacts and the visual impacts of mitigation requirements arising from increased vehicle flows, the rail network and noise from adjoining land uses will need to be taken into account;
4. Trunk and local road impacts, including at Old Craighall, arising as a result of the cumulative impact of development including that within East Lothian, and the safeguarding of land for a new rail halt together with other measures intended to reduce travel by private car;
5. Detailed modelling of traffic and air quality impacts to establish if the preferred strategy can be supported in the Proposed LDP, including consideration of cumulative impacts;
6. Education capacity constraints would need to be overcome;
7. In to the medium / longer term additional strategic foul drainage capacity may be required;
8. Identification of any ground conditions constraints and methods of mitigation;
9. Comprehensive masterplan would be required.

Those parties promoting development sites in this area must work together and with the Council to demonstrate to its satisfaction that the above issues can be satisfactorily addressed and associated mitigation delivered so sites are / can be made effective before they may be included in a Proposed LDP. It is expected that developer contributions will have a significant role to play in securing mitigation as appropriate.

Key Messages: Blindwells

The SDP confirms continued commitment to Blindwells as a significant development opportunity. The current allocation could deliver circa **1,600 homes and 10ha of employment land** in the period to 2024 and beyond. However, the SDP does not expect dwelling completions from Blindwells until the period 2019 - 2024. A west to east phasing of development for the current allocation is required. In regional terms the Blindwells area is highly accessible, including by public transport, and there are opportunities to improve this. The cumulative impact of development on the transport network, including at Old Craighall, is an important issue that requires to be resolved. The area is in high demand as a place to live and offers the potential for job creation. Strategic water and drainage capacity exists to serve the current allocation. However, the current education solution for Blindwells may need to be reviewed, including the Blindwells education cluster. An alternative education solution for the current allocation may be promoted. This may involve 1) utilising available education capacity at Cockenzie Primary School to allow for the construction of permanent primary school facilities at Blindwells, and 2) by providing additional capacity at Preston Lodge High School to secure a permanent secondary education solution for the current allocation. This would be subject to school catchment reviews. The SDP also recognises that the Blindwells area may have further significant growth potential and that the current local plan proposal may need to be reviewed. The SDP has a long-term vision for Blindwells new settlement: this is the creation of a large scale new mixed community that will contribute to housing land requirements up to 2032 and beyond. **Into the much longer term it may be that Blindwells could grow in to a settlement of circa 6,000+ homes and provide significant employment opportunities.** If comprehensive solutions are found for a larger new settlement, this would allow the LDP to identify the area of land within which such a development may take place as well as confirm the scale of the new settlement. A confirmed ability to expand Blindwells would provide a number of important opportunities for East Lothian. One of these would be for a new town centre to be provided at Blindwells of a size that may also serve surrounding communities. This could help regenerate nearby settlements whose economic base has declined and which have limited scope for further expansion. Located in the highly accessible western part of East Lothian, where most of the area's population is, Blindwells is also a logical location to promote employment and inward investment opportunities. Provision of new jobs, community services and potentially further education facilities would improve the availability and accessibility of these amenities to East Lothian's communities. This could help minimise the need to travel and travel distances as well as related CO₂ emissions. However, without a clear and agreed strategy for how a single larger new settlement could be delivered here, including the willingness of all relevant landowners to contribute to the solution, the SDP expects the expansion of existing settlements to be prioritised over a separate stand alone development to the east of the current Blindwells allocation. Comprehensive solutions must be confirmed that will deliver a single new settlement at Blindwells before any further land may be allocated there for development. If such solutions are not found, the contribution that Blindwells may be expected to make to the development strategy will be reviewed, including if the concept should be retained in whole or part or not at all.

Question 17: Blindwells New Settlement

Do you support the preferred approach promoted in relation to the current allocation for Blindwells new settlement (1,600 houses and 10ha of employment land)? If you do not support it please indicate what alternative you would suggest and explain why?

Do you support the preferred approach promoted in relation to a potential expansion of Blindwells new settlement (beyond the current allocation)? If you do not support it please indicate what alternative you would suggest and explain why?

Potential options have been identified for how education capacity might be provided for the new settlement through time. How do you think those options could be funded and delivered, and where should the facilities be located?

Delivery mechanisms will be required to enable the development of the new settlement. What do you think the options for this are?

Do you have any other comments in relation to the proposals for Blindwells new settlement?

Cluster Analysis Summary - Housing Land Requirements and Housing Land Supply

6.112 SPP, the SDP and its associated SG on Housing Land set out how the SDP housing requirement is to be met and the basis of the calculation to demonstrate this. Accordingly, Table 26 is based on the tables in the cluster analysis above that set out the rate of housing development currently anticipated through time from the sites that are preferred at this stage: it draws this information together for East Lothian as a whole. Table 26 demonstrates that the current preferred sites, in combination with the established housing land supply and a small allowance for 'windfall' housing development, could satisfy the SDPs housing requirements up to 2019 and 2019 – 2024, and that an effective 5 year housing land supply could be maintained at all times when the LDP is operative. Overall, a 12% generosity factor would also exist in the housing land supply during the LDP period.

Table 26: Housing Land Requirements and Housing Land Supply

PLANNING PERIODS	2009 - 19	2019 - 24	TOTAL TO 2024	2024 -32 ⁽⁵⁾	Beyond 2032	TOTAL SUPPLY
SDP Housing Requirement to 2024	6,250	3,800	10,050	<i>3,820</i>	<i>0</i>	13,870
Dwelling Completions 2009 – 13	1,321	0	1,321	0	0	1,321
Contribution from Established Land Supply ⁽¹⁾	2,939	1,793	4,732	0	0	4,732
Contribution from Preferred MIR Sites	2,126	2,416	4,542	1,198	0	5,740
Contribution from Future Windfall Sites ⁽²⁾	220	110	330	110	0	440
Loss of Supply to Dwelling Demolitions ⁽³⁾	0	0	0	0	0	0
Sub-Total Housing Land Supply	6,606	4,319	10,925	<i>1,308</i>	<i>0</i>	12,233
<i>Contribution from Blindwells</i>	<i>0</i>	<i>363</i>	<i>363</i>	<i>801</i>	<i>436</i>	<i>1,600</i>
Grand Total Housing Land Supply	6,606	4,682	11,288	<i>2,109</i>	<i>436</i>	13,833
<i>Shortfall / Surplus of Housing Land⁽⁴⁾</i>	<i>-356</i>	<i>-882</i>	<i>-1,238</i>			
<i>% generosity in land supply to 2024</i>			<i>12</i>			

⁽¹⁾ Includes a contribution of 80 dwellings from small sites (less than 5 units) programmed 2013–18 as per Agreed 2013 Housing Land Audit; ⁽²⁾ SESplan's windfall assumption for East Lothian has been used at this stage, but this may be reviewed for the Proposed LDP: the annual average windfall contribution for East Lothian 2008 – 2013 was higher; ⁽³⁾ SESplan's demolitions assumption for East Lothian has been used at this stage, but this may be reviewed for the Proposed LDP; ⁽⁴⁾ A negative number indicates a surplus of housing land against the housing requirements; ⁽⁵⁾ For the avoidance of doubt, the figure for the period 2024 – 32 is not part of the SDPs housing requirement, but is an estimate of need and demand for housing during that period from the SESplan HoNDA.

Question 18: Housing Land Requirements and Housing Land Supply

Does Table 26 set out the proper way of calculating how the SDP housing requirement is to be met? Please explain your answer.

7 Main Policy Issues

Introduction

- 7.1 The LDP and / or Supplementary Guidance must set a policy framework against which all applications for planning permission, whether on allocated sites or not, will be assessed. The current local plan has a range of planning policies covering matters such a biodiversity and natural heritage, the built and historic environment, retailing, minerals, energy and the planning requirements on development sites. These policies have been reviewed internally and in consultation with others, including SNH, SEPA and Historic Scotland for continued relevance and to establish if any change to them may be justified, taking account of updated national and regional planning strategy and policy (NPF3, SPP and SESplan).
- 7.2 The review has found that the principles behind the majority of the current local plan policies remain relevant. They have been used in assessing and determining planning applications and have proved to be robust. For example, there are very few instances of policies being overturned at planning appeal. However, that is not to say that there is no need to review them for continued relevance and robustness. Changes in national and regional planning strategy and policy indicate that in some circumstances there may be some scope for the MIR to consult on potential amendments. Examples of this include consideration of the policy approach to developer contributions, affordable housing, energy, minerals and waste.
- 7.3 The discussion on potential changes to the policy approach is separated in to potential major changes and minor changes. Only potential major changes are discussed in the MIR. The Monitoring Statement discusses the potential minor changes, which are also listed at Appendix 6 but with limited discussion. The policy review in the Monitoring Statement sets out the policy issues and the approach to potential minor changes and where there may be an opportunity to include policies in Supplementary Guidance. As part of the planning system reforms LDPs are to focus on vision, spatial strategy and on related overarching key policies and proposals. Consequently, much detailed policy material can be contained in Supplementary Guidance. For any Supplementary Guidance to form part of the Development Plan there should be a clear link to it in the LDP. There is also a requirement for public consultation on Supplementary Guidance and Scottish Ministers have a role to check it before it can be adopted.
- 7.4 Notwithstanding this, the intention is to include key planning policies and proposals that relate to the core spatial strategy in the LDP. These would include proposals for new housing and employment land as well as others that may be related to the core spatial strategy, as well as policies such as those on Green Belt and development in the countryside, and on flooding, built and natural heritage, retailing, minerals and waste etc. Other detailed policies that are aimed more at Development Management, such as site layout and design, and those not directly related to the core spatial strategy, may be taken forward through Supplementary Guidance.

Developer Contributions

- 7.5** Securing funding and delivery mechanisms for infrastructure provision is at the core of how development can be enabled, particularly during challenging economic conditions, and is a main issue for the LDP. The SDP and its Action Programme set out the items of strategic infrastructure required to support the SDP. It also requires LDPs to identify the full range of supporting infrastructure requirements, including those for which developer contributions will be sought³⁹. The land needed to deliver these is to be safeguarded where appropriate.
- 7.6** The SDP suggests that Supplementary Guidance should be prepared alongside the LDP with standard charges and formulae⁴⁰ set out in a way that assists applicants. Funding is also to be sought from infrastructure and service providers and innovative delivery mechanisms are to be considered. Where known at this stage many of the likely infrastructure issues associated with delivering the SDP's development requirements for the area are set out above. Once the Council has set out the strategy and sites in its Proposed LDP it will also set out in its draft Action Programme the associated infrastructure requirements. However, there are limitations on the items for which developer contributions can be justified as well as how contributions can be gathered and / or spent to provide infrastructure when needed to help enable development.
- 7.7** Scottish Government Circular 3/2012: Planning Obligations and Good Neighbour Agreements must be complied with in order to seek developer contributions. Section 75 of the Town & Country Planning (Scotland) Act 1997 (as amended) allows planning obligations to be entered into to secure contributions by registering the obligation against the land – e.g. to bind subsequent owners. The Local Government (Scotland) Act 1973 (s69), The Countryside (Scotland) Act 1967 and The Roads (Scotland) Act 1984 (s48) allow upfront payment to be made by applicants.
- 7.8** Circular 3/2012 seeks to ensure that applicants are not required to provide any more mitigation than needed to address the impact of their development and to make it acceptable in planning terms. A cumulative assessment of impact and apportionment of associated mitigation / costs should be followed. Applicants cannot be expected to resolve existing deficiencies in provision. An important principle in this is that the mitigation of impacts generated by development proposals should not be met by the authority; rather, mitigation is to be funded proportionally by the developments which generate the impact, so long as this is justified based on the best information available at the time. However, a developer contribution regime cannot extend to include long term revenue impacts as this is a matter for the service and infrastructure providers concerned.

³⁹ SESplan SDP Policies 8 & 9 and paragraphs 118 – 123, and SESplan SDP Action Programme.

⁴⁰ SESplan SDP paragraph 123

- 7.9 Whilst the Development Plan process is to focus on providing early clarity on the nature of any interventions, as described above these can only be clarified once the spatial strategy is finalised – e.g. at Proposed Plan stage. Currently, it is also not the case that costs can be detailed for all infrastructure projects during plan preparation. This is because circumstances outwith the control of the relevant authority can change though time, and this should be monitored when the plan is operative. For example, the number of dwellings and / or amount of commercial floor space anticipated in the area may change as might the overall amount and rate of development. Such variables can influence demand projections for transport and education capacity as well as the associated design solutions for mitigation and associated cost apportionment. These factors can also influence when additional infrastructure capacity may be required.
- 7.10 Managing and monitoring the intake and spending of developer contributions to ensure projects can be delivered at the right time is complex, time consuming and resource intensive. The uncertainty makes administering a developer contribution regime as part of any planning, capital planning, asset management and delivery strategy very challenging. In practice, current arrangements do not work well as part of a streamlined planning process which is also to be focused on delivery.
- 7.11 Circular 3/2012 prefers that the assessment of a developments impact be based on the best information available at the time any planning application is made. Yet Policy 9 of the SDP may support the prior setting of contribution values / requirements, which would assist in providing early clarity on these matters for applicants as well as the Council. However, the need to strictly comply with the ‘tests’ in Circular 3/2012 may prevent such an alternative approach being followed. It may be that no significant changes can be made to current arrangements unless there are changes to the established practice of interpreting and applying Circular 3/2012 or if the Circular is reviewed.
- 7.12 It is not possible to seek developer contributions retrospectively towards capacity in infrastructure / facilities that are already in place. In most cases it may be that the front funding of infrastructure needed to enable development, subject to a mechanism to recover it from future applicants, is not currently an option for the Council. Yet there may be situations where agreement to spread the payment of contributions over the programme of a particular development may be accepted if the risks can be managed through the use of a planning obligation.
- 7.13 There is to be an emphasis on pre-application discussions and agreement between applicants and service and infrastructure providers. This is particularly true where there is a need to resolve complex issues such as the phasing and timing for new infrastructure on a site relative to the development of the site. Securing early clarity on this is important to the development appraisals as well as the planning authority’s performance.

Table 27: Developer Contributions

Preferred Approach	In relation to developer contributions the preferred approach is to continue with the current approach for all applications. A cumulative assessment would continue to be undertaken on a case by case basis as and when applications are made.
Reasonable Alternative	In relation to developer contributions an alternative approach is to explore setting a flat rate developer contribution, for example for a catchment area of specific facilities such as in relation to primary school and secondary school facilities. The flat rate would be reviewed annually and contribution values would be index linked.

Question 19: Developer Contributions

In terms of approach to infrastructure and developer contributions do you support the preferred approach, the reasonable alternative, or neither?

Please explain your answer. If you support neither of the above options, what alternatives do you suggest?

Affordable Housing

Affordable Housing Quota

- 7.14** The approved SDP requires LDPs to set out an appropriate approach to the provision of affordable housing in their area, taking into account the local characteristics and the need for affordable housing⁴¹. SPP expects alignment between the Local Housing Strategy for the area and the approach to planning for housing in the Development Plan, including affordable housing.
- 7.15** SPP broadly defines affordable housing as housing of reasonable quality that is affordable to people on modest incomes⁴². The need for affordable housing should be met where possible in the market area where it arises. Development Plans are expected to address the need for affordable housing in their policies and proposals, if supported by a Housing Need and Demand Assessment (HoNDA).
- 7.16** Development Plans are also to be clear on the scale and distribution of the affordable housing requirements for the area, which may include any differences with respect to urban and rural locations, and what is expected of developers. SPP suggests that the level of contribution for affordable housing expected from a market site should generally be no more than 25% of the total number of units. Higher affordable housing requirements may be justified in relation to particular sites, for example where land is publically owned. In addition, as detailed under the section on Development in the Countryside above, a rural exceptions policy may be considered where this would help deliver solely affordable housing proposals for more remote rural settlements if no such opportunities exist within those settlements.
- 7.17** The SESplan HoNDA provides the analysis of housing need and demand in East Lothian and has been signed off by the Scottish Government as robust and credible. It identifies that there is an ongoing need for affordable housing in East Lothian and that this need continues to grow. The SESplan HoNDA provides evidence to show that between 2009 and 2032, 33% of the total housing supply is required to be provided as affordable housing. Furthermore, between years 2009 and 2019, the SESplan HoNDA demonstrates that the affordable housing requirement is more acute with a 41% annual requirement⁴³.

⁴¹ SESplan SDP paragraph 117

⁴² Scottish Planning Policy paragraph 126

⁴³ SES Plan Housing Technical Note November 2011 (Table 4 - Demand for New Houses Net of Turnover, page 9) <http://www.sesplan.gov.uk/assets/files/docs/proposed-plan/technical/Housing%20Technical%20Note%20Final.pdf>

7.18 This situation is likely to have got more challenging since publication of the HoNDA due to recent economic conditions and the difficulties people on modest incomes are experiencing when seeking to gain access to personal finance as well as save. This may also have an implication on the tenures of affordable housing that are needed, particularly in the short term.

Table 28: Affordable Housing – Affordable Housing Quota

Preferred Approach	The preferred approach to setting the affordable housing quota is to retain existing affordable housing quotas for all current local plan proposals and for all windfall proposals registered prior to the adoption of the LDP. The LDP will set the quota for serviced affordable housing land at 25% for new housing proposals. Delivery mechanisms must be agreed with the Council. The trigger at which the transfer of serviced land for affordable housing will be sought shall be for proposals consisting of 5 or more dwellings.
Reasonable Alternative	An alternative approach to setting the affordable housing quota is to set a 30% affordable housing quota for new housing proposals. In all other respect the same approach as the preferred one would be followed.

Question 20: Affordable Housing Quota

In terms of approach to the affordable housing quota do you support the preferred approach, the reasonable alternative, or neither?

Please explain your answer. If you support neither of the above options, what alternatives do you suggest?

Affordable Housing Tenure Mix

- 7.19** Another issue for the LDP is whether the current 80-20% mix of social rented and LCHO accommodation respectively remains an appropriate tenure mix to seek to deliver on the serviced land secured under the affordable housing policy quota. SPP suggests that a wider range of housing tenures can be affordable, including homes for social and mid-market rent, shared ownership and shared equity models, and discount low cost housing for market sale, including self build plots and low cost housing without subsidy⁴⁴. There are a variety of delivery mechanisms for affordable housing provision.
- 7.20** Acceptance of a wider tenure mix may ensure housing, including affordable housing, can be delivered whilst also allowing infrastructure to be funded so sites can be developed. Policies and proposals are to take into account development viability, the strength of the housing market, the ability to deliver affordable housing in an appropriate way on small sites (including consideration of off-site provision and commuted sums) as well as the availability of public funding. However, where support is offered for a wide tenure mix, the availability of public funding should not inhibit the delivery of affordable housing.
- 7.21** Where the Development Plan specifies a quota for affordable housing as well as the approach to delivering it this allows developers and landowners to assess the cost implications of providing serviced land for affordable housing at an early stage. This means that the provision of affordable housing and other planning obligations should be taken into account in development appraisals and land valuations.

Table 29: Affordable Housing Tenure Mix

Preferred Approach	The preferred approach affordable housing tenure mix is to support a wide range of affordable housing tenure models, including social rent, shared ownership / shared equity, homes for midmarket and intermediate rent, and low cost housing for market sale and self build plots. The Council will specify in Supplementary Guidance to be prepared alongside the LDP the affordable housing tenures that will be supported. It will also specify targets for the range of affordable housing tenures. In all circumstances the mechanism for delivering affordable housing must be agreed with the Council, including the mix of affordable house types, sizes and tenures as well as the area of land needed to deliver them in an appropriate layout and form of development. These matters should be agreed during pre-application discussion so they are included in development appraisals before land is acquired, together with the need for any other planning obligations.
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⁴⁴ Scottish Planning Policy paragraph 126

Reasonable Alternative	The alternative approach affordable housing tenure mix is to retain the existing 80%/20% tenure mix: 80% to be social rent and 20% to be other forms of affordable tenure, delivered on the serviced land secured through the quota. The Council will specify in Supplementary Guidance to be prepared alongside the LDP which affordable housing tenures will be supported and how the affordable housing tenures will be delivered.
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Question 21: Affordable Housing Tenure Mix

In terms of approach to the mix of affordable housing tenures do you support the preferred approach, the reasonable alternative, or neither?

Please explain your answer. If you support neither of the above options, what alternatives do you suggest?

Energy, Including Renewable Energy

7.22 NPF3 and SPP are clear that planning must facilitate the transition to a low carbon economy by supporting means of energy generation which help reduce greenhouse gas emissions. The promotion of renewable energy developments should be included in the LDPs spatial strategy to guide such development to appropriate locations. A diverse range of renewable energy generation and the development of heat networks is to be supported. Development plans are to aim to achieve their areas full potential for production of electricity and heat from renewables, taking environmental, community and cumulative issues into account by helping to secure:

- 30% of overall energy demand from renewable sources by 2020;
- 11% of heat demand from renewable sources;
- the equivalent of 100% of electricity demand from renewable sources by 2020⁴⁵.

7.23 Proposals for non-renewable energy generation may also be acceptable where carbon capture and storage or other emissions reduction infrastructure is in place or committed within the developments timeline and good environmental standards are secured. NPF3 supports the continued use of the Cockenzie Power Station site for thermal energy generation and carbon capture and storage, and is identified as a National Development. The Scottish Government Energy Consents Units has issued planning permission for the works necessary to convert the power station from coal fired to gas fired. To supply fuel to the power station a new gas pipeline will be required, planning permission for which has also been approved. The LDP should offer support in principle to this National Development. NPF3 also notes that other energy related uses at and around this site may also be supported and that the coastline between Cockenzie and Torness has potential to become a renewable energy hub (as explained at paragraph 6.32 above). The intention is to reflect this in the LDP, and to review existing local plan policies and proposals as appropriate.

7.24 Torness nuclear power station continues to operate with two reactors, and a British Energy Consultation Zone exists around the facility. There are no confirmed plans or timescale for decommissioning the station and the current generating licence there extends to 2023. If Torness Power Station were to be decommissioned this would potentially bring significant implications for the planning process both in terms of the decommissioning itself, but also in terms of restoration, waste disposal and the after use of the site. As with Cockenzie Power Station, a significant attribute of the Torness site is its location at the mouth of the Forth, its access to the trunk road and nearby rail network, and its deep water harbouring facilities.

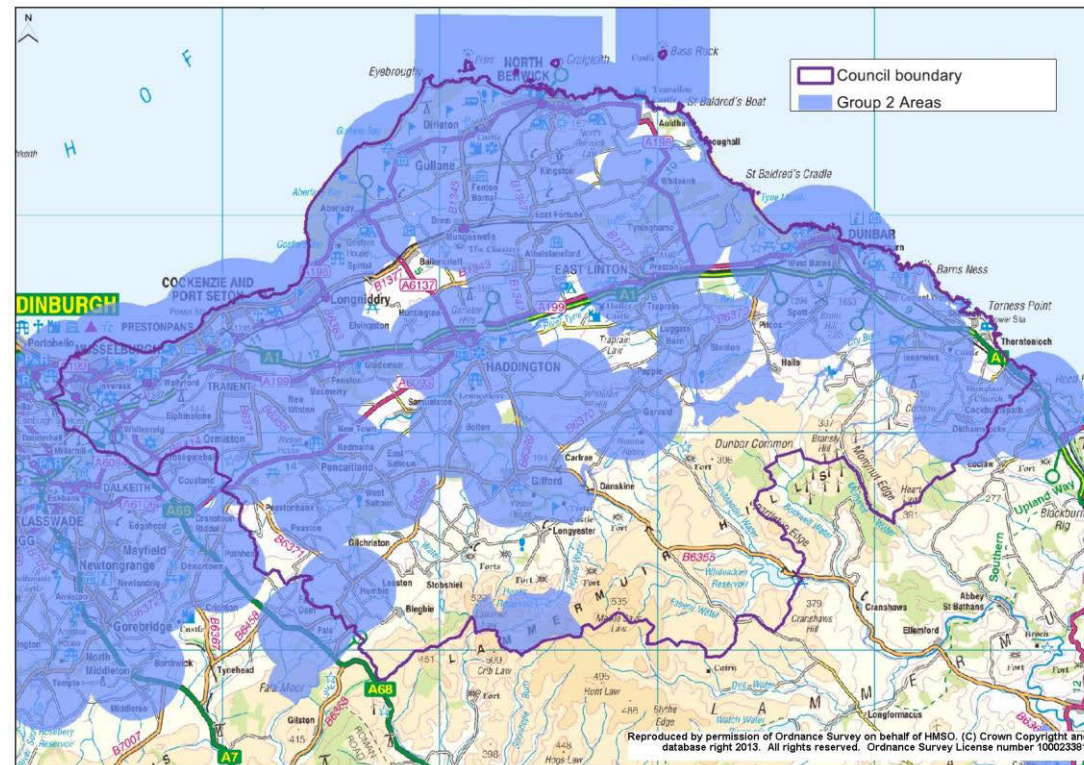
⁴⁵ Scottish Planning Policy paragraph 154

On Shore Wind Energy Proposals

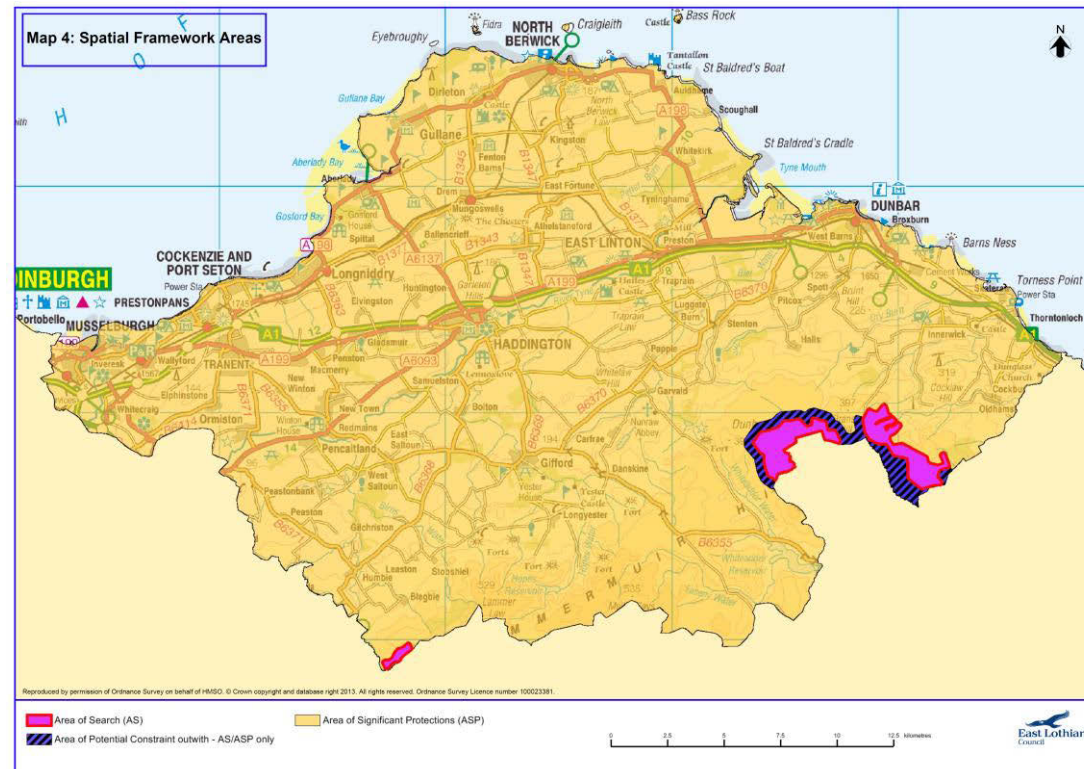
- 7.25** On shore wind energy proposals are becoming an issue in the area, due to visual impact and landscape sensitivity, with cumulative impacts a related consideration. This is equally true for commercial scale operations as it is for individual or small groupings of turbines in the open countryside. The Council has recently approved supplementary guidance for both scales of wind energy proposals. They set a spatial framework for guiding such proposals to appropriate locations and for assessing related planning applications.
- 7.26** However, with the introduction of the revised SPP (June 2014) the method for producing spatial frameworks for wind farm development has changed. The method set out at Table 30 below must be followed. However, it is for planning authorities to determine what scale of wind energy proposals the spatial framework should cover. In addition to setting out criteria based policies for the assessment of wind energy proposals, the planning authority is also to set out its attitude on issues of cumulative impact in its area.

Table 30: Scottish Government Spatial Framework for Wind Farm Development - Scottish Planning Policy 2014	
Group	Criteria for inclusion in Group
Group 1: Areas where wind farms will not be acceptable	National Parks and National Scenic Areas
Group 2: Areas of Significant Protection; windfarms may be appropriate in some circumstances	<ul style="list-style-type: none"> • Certain designated sites: Natura 2000 sites; SSSI's, Battlefields and Designed Landscapes. World Heritage Sites, National Nature Reserves • SNH wild land • Carbon rich soils • Within 2km of a Local Plan settlement
Group 3: Areas with potential for windfarms where development is likely to be acceptable, subject to consideration against identified criteria*	Everywhere else
<i>*For example, criteria could include safeguards for individual properties and settlements not identified within the development plan; economic impacts, contribution to renewable energy targets and greenhouse gas emissions, cumulative impact, landscape and visual effects, impacts on the natural heritage and historic environment, road traffic and hydrology.</i>	

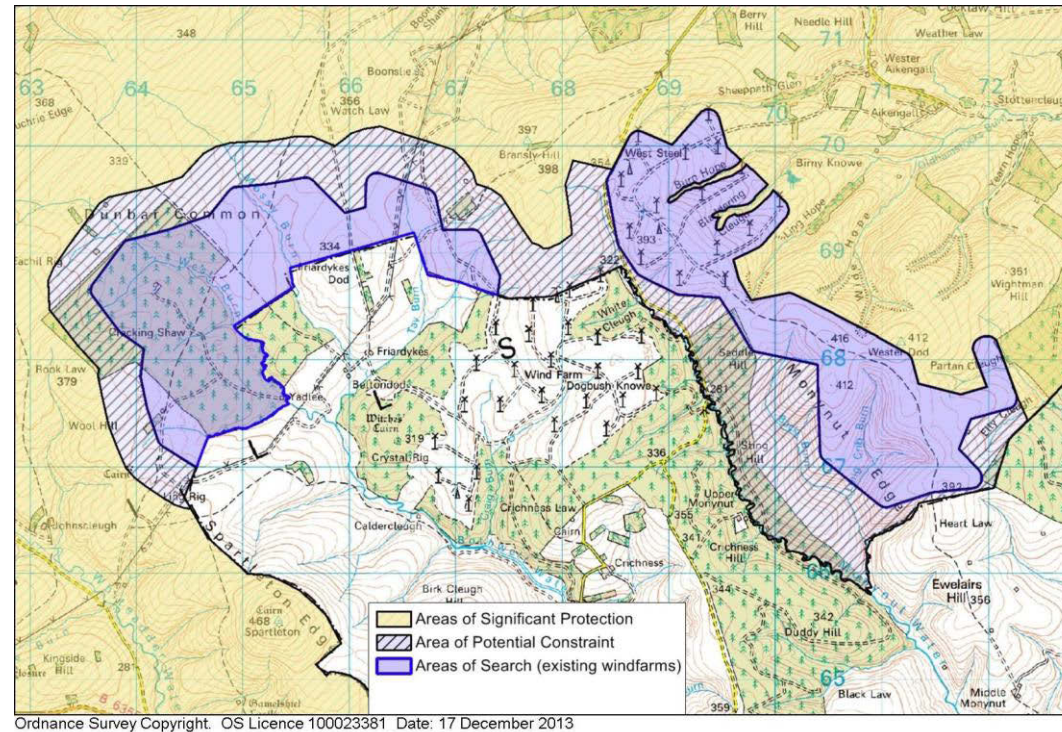
- 7.27** The plan below shows how the Scottish Governments spatial framework method applies to East Lothian. As there are no Group 1 areas in East Lothian, the plan shows the Group 2 areas, including a 2km separation distance around settlements identified in the current local plan. This plan therefore illustrates the Area of Significant Protection, consistent with SPP.



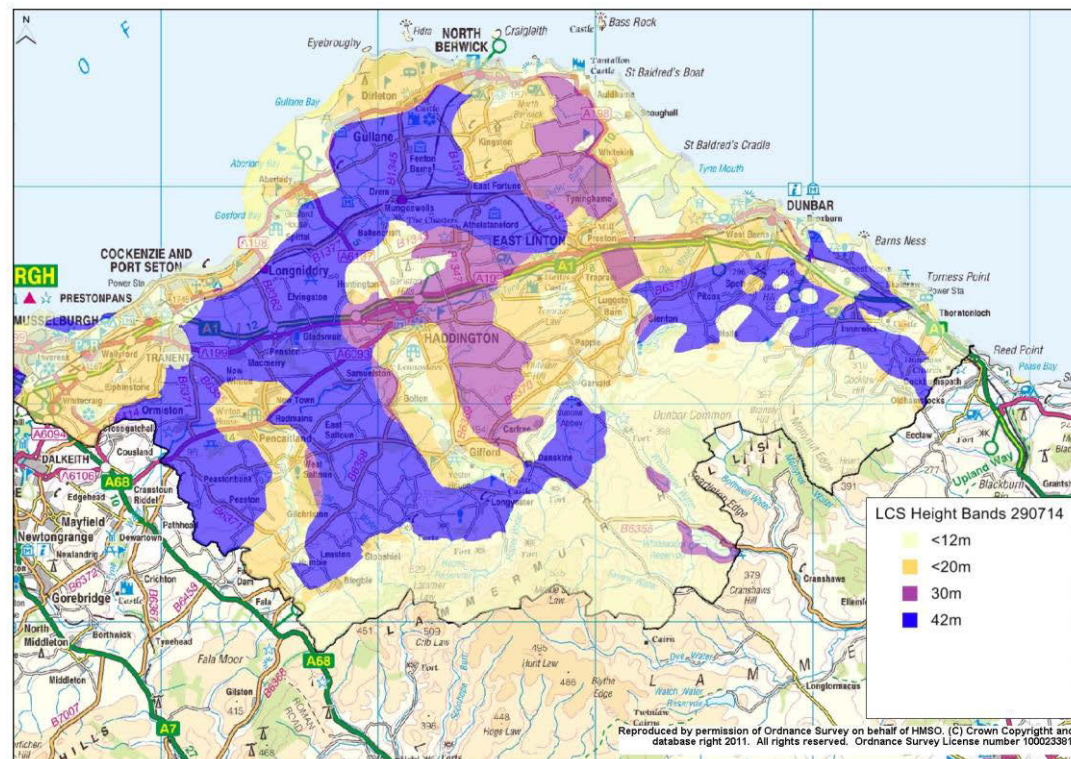
7.28 However, based on a detailed landscape capacity study (2005, supplemented 2011) much of the land within and outwith the Group 2 area is sensitive to wind turbine development. The Scottish Government's new approach would suggest that those areas outwith the Group 2 areas - i.e. Group 3 areas - may have greatest capacity for wind energy development. However, the Council's landscape capacity study suggests that parts of the Group 3 areas are among the most sensitive. The Supplementary Landscape Capacity Study considered sensitivity of the landscape to smaller scale wind development, and where there might be capacity for particular types. The Council has already published Supplementary Planning Guidance for Wind Farms over 12MW (November 2013) as well as Supplementary Planning Guidance for Lowland Wind Turbines (June 2013). This guidance generally remains relevant and their principles should continue to be followed. A new spatial framework for wind energy development in the area will be prepared and it will set out the Council's views on cumulative issues.



7.29 SPP states that the LDP should identify where there is scope for wind farm development in the area. In respect of wind farm developments above 12MW, it is very unlikely there will be any scope for further such stand alone developments due to cumulative issues. However, there may be limited scope for development above 12MW in the Lammermuir Hills where they are read as extensions to existing wind farms, subject to it satisfying policy criteria. Based on existing guidance, the areas which at that time were not considered to have reached the limits of development without adverse cumulative impact are illustrated on the plan above and below (extracted from existing guidance), but further consideration of cumulative impacts may alter these areas. This could mean that the areas not affected by cumulative issues could be reviewed – i.e. extended or reduced in size and / or that new areas may be identified.



7.30 SPP also notes that LDPs should set out the minimum scale of wind energy development their spatial framework is intended to apply to. The Supplementary Landscape Capacity study considered wind development from 12m single turbines to up to 6 turbines of 120m high, while the original study considered larger scale development, including extensions to existing windfarms. The findings of these studies remain relevant. It is proposed that the new spatial framework would relate to the scales of development for which potential is shown in the Supplementary Landscape Capacity Study.



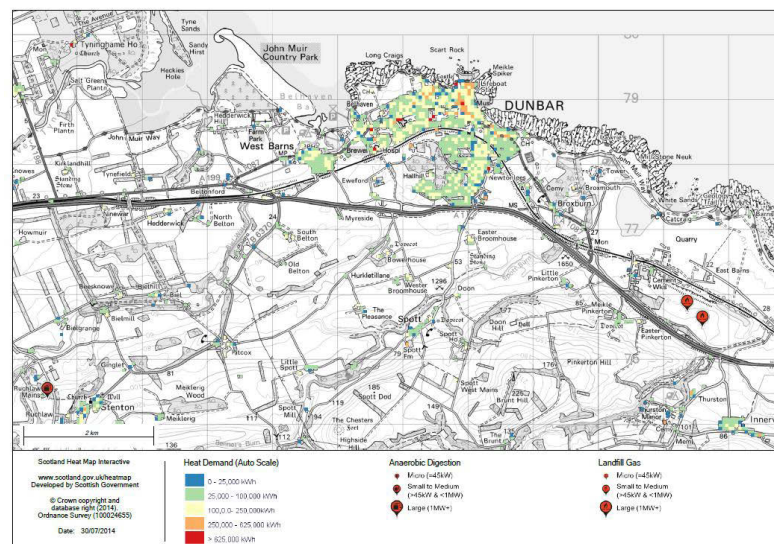
7.31 The map above shows the maximum height of development for which there was considered to be capacity in the Supplementary Landscape Study, which did not consider the scope for larger scale wind energy development. It is intended that the heights shown here are the minimum scale of development to which the spatial framework would apply. Within the Group 2 area, proposals for wind energy developments above the heights specified on the plan above would normally be resisted. Within the Group 3 area the potential location for wind farm development has already been identified above; elsewhere in the Group 3 area proposals for wind energy developments should be consistent with the height bands identified on the plan above. This takes account of the landscape capacity study which provides a detailed consideration of landscape and visual impact.

7.32 In addition to the above, policy criteria, similar to those in the current local plan, will be used to protect cultural and natural heritage assets as well as individual houses or those communities not identified in the plan. Consideration of cumulative issues will feature as a policy criterion. Cumulative issues for windfarms of over 12MW have been identified in the existing supplementary planning guidance for Windfarms of Over 12MW; for smaller scale development, cumulative issues were identified in the Supplementary Landscape Capacity Study. For both scales of development, the cumulative impact issues are similar and they are set out at Appendix 2. The areas to which cumulative issues apply will be reviewed and set out in Supplementary Guidance.

Heat Mapping / Networks

7.33 As well as deriving heat from renewable sources, the use of existing heat, sometimes given off as waste heat, should be promoted. The Scottish Government has produced Heat Maps, which indicate demand for heat as well as renewable electricity generators and other producers of heat. However, these maps are still being refined. The heat maps should be used to identify potential opportunities for co-locating heat producers and users. Local Development Plans are to support the development of heat networks wherever possible and the LDP will contain such a policy.

Heat Map Extract



Decentralised Energy and Heat Networks & Other Renewable Energy Development

- 7.34** In the development of larger sites, or in the development of new settlements, energy centres and the infrastructure for creating district energy and heat networks should be provided; there may be scope for district heating schemes, combined heat and power or to utilise geothermal opportunities. The scope to secure energy and heat from incinerating waste may also be possibility in certain circumstances, such as where facilities emerge adjacent to demand. Where heat networks are not viable, micro generation and heat recovery associated with individual properties shall be encouraged. These matters will be addressed in LDP policy.
- 7.35** There has also been interest in solar energy proposals, anaerobic digestion and small scale hydro schemes in the area, which bring their own impacts. Currently, these proposals are assessed on their merits. No policy or supplementary guidance currently exists in respect of that type of renewable energy development in East Lothian.
- 7.36** Any approach to these issues will need to reconcile the competing objectives of supporting renewable energy generation while maintaining and enhancing the character and quality of the East Lothian landscape and townscape of its settlements.

Table 31: Energy, Including Renewable Energy

Preferred Approach	In relation to energy, including renewable energy the following approach is preferred:
	<ul style="list-style-type: none">• Support Cockenzie becoming a gas fired power station, consistent with NPF3 and current Section 36 consent and safeguard the consented route for the overland gas pipeline to support Cockenzie Power Station becoming gas fired;• Support Cockenzie as a potential location to support off shore renewable industry and / or for port related activity, and in to the longer term potentially Torness too;• Support grid connection for off shore renewables, including (underground) transmission line to point of connection along the Forth coast, particularly at Cockenzie and / or Torness, and subject to minimising landscape impact including by combining infrastructure where possible;• Illustrate spatial framework for wind energy proposals and prepare associated Supplementary Guidance with a view to reviewing the areas not affected by cumulative issues – i.e. extend or reduce them in size and / or identify new areas;

	<ul style="list-style-type: none"> • Promote district heating and combined heat and power facilities in large scale development sites as well as the use of heat from renewable sources and waste heat; • Consider the preparation of a specific policy and / or guidance for other forms of renewable energy proposals such as solar and small scale hydro schemes were appropriate.
Reasonable Alternative	In relation to energy, including renewable energy the alternative approach is generally the same as the preferred approach, <u>but</u> in relation to the spatial framework for wind energy proposals, continue to use existing guidance for larger scale wind farm development as regards cumulative issues instead of reviewing this.

Question 22: Energy, Including Renewable Energy

In terms of approach to energy proposals, including renewable energy proposals, do you support the preferred approach, the reasonable alternative, or neither?

Please explain your answer. If you support neither of the above options, what alternatives do you suggest?

Use of Low & Zero Carbon Technologies in New Buildings

- 7.37** The Town and Country Planning (Scotland) Act 1997 (as amended), Section 3F, requires LDPs to include policies that require all new development to be designed to ensure new buildings avoid a specified and rising proportion of the projected greenhouse gas emissions through use of low and zero-carbon generating technologies (LZCGT). SPP recommends that such policies accord with the standards, guidance and methodologies of the building regulations. Building Standards promote a 'fabric first' approach for new construction and do not currently mandate the use of LZCGT, nor are they expected to do so when revised standards are introduced in 2015.
- 7.38** Sustainability labelling was introduced to the Scottish Building Standards in 2011, requiring all new buildings submitted for building warrant to achieve a sustainability label. A 'Bronze' label indicates compliance with the mandatory standards, while 'Bronze Active' indicates that these have been met partly through the use of LZCGT. There are further optional labels with rising sustainability requirements.
- 7.39** The Scottish Government has suggested that planning authorities may want to link their Section 3F policies to the sustainability labelling scheme. However, an 'active' label only demonstrates that LZCGT have been used and there is currently no scope via sustainability labelling to demonstrate that a specified proportion of emissions are avoided through LZCGT as required by Section 3F of the Planning Act.
- 7.40** There are two broad planning policy options in response to Section 3F, either to require emissions savings that are additional to Scottish Building Standards, or to only require that the emissions savings from LZCGT are part of the way in which those standards are met. The latter approach would not achieve any emissions reductions in itself, and may in fact result in less energy efficient buildings. It would, however, promote the use of LZCGT.
- 7.41** In either case, an LDP policy is expected to cover three main elements: a proportion of emissions to be saved; at least one increase in the proportion of emissions to be saved; and a requirement that the savings should be achieved through the use of LZCGT (rather than energy efficiency measures). The detail of the policy including percentage requirements and timescales for increases, together with how it will be implemented in practice and any exceptions that might be appropriate, may be best located within Supplementary Guidance.

Table 32: Use of Low & Zero Carbon Generating Technologies in New Buildings

Preferred Approach	In relation to low and zero carbon generating technologies the preferred approach is to require Scottish Building Standards mandatory CO ₂ reduction targets to be achieved partly through LZCGT. The percentage requirements and timescales for increase would be set out in SG but these would be anticipated as initially being 10% of mandatory CO ₂ reductions to be achieved through LZCGT.
Reasonable Alternative	In relation to low and zero carbon generating technologies the alternative approach is to require LZCGT to be used to reduce CO ₂ emissions beyond Scottish Building Standards mandatory requirements. The percentage requirements and timescales for increase would be set out in SG but could be set initially at an additional 10% CO ₂ emissions reduction through LZCGT beyond Scottish Building Standards mandatory requirements.

Question 23: Use of Low & Zero Carbon Generating Technologies in New Buildings

In terms of approach to use of low and zero carbon generating technologies (LZCGT) in new buildings do you support the preferred approach, the reasonable alternative, or neither?

Please explain your answer. If you support neither of the above options, what alternatives do you suggest?

Minerals, Including Aggregates & Coal

- 7.42** SPP requires Development Plans to identify, review and safeguard areas of search for mineral extraction⁴⁶. Planning authorities are also to ensure a minimum 10 year landbank of permitted reserves for construction aggregates. The SDP requires the LDP to identify areas of search for mineral extraction, including aggregates and coal. This review has been undertaken at SESplan level in so far as the available landbank is concerned⁴⁷. It also requires mineral resources to be safeguarded where appropriate and use of secondary / recycled aggregates to be encouraged.
- 7.43** The current position is as follows. There may be a shortage of sand and gravel in terms of maintaining a 10 year landbank in the SESplan area. Longyester sand and gravel quarry in East Lothian has reserves estimated to be sufficient for one year, and an application for its extension has been approved. The LDP will safeguard this extension area as an area of search for future sand and gravel extraction in East Lothian. It will also safeguard Skateraw sand and gravel quarry. There is no shortage of hardrock as the landbank in the SESplan area is greater than 10 years. In East Lothian, Bangley hard rock quarry is currently inactive, but has a reserve of around 14 years remaining, as does Markle Mains hard rock quarry which is active. A Limestone quarry is active at Oxwellmains providing raw materials for cement manufacture and the LDP should safeguard the resource and provide for its working.
- 7.44** There are currently no operational coal mines of any kind in East Lothian. Previous operations have ceased at Blindwells, with BGS plans illustrating the current allocated site and land to the east of it as a 'worked area'. A previous planning appeal for further opencast coal workings around Tranent and Elphinstone was dismissed due to the proximity of the proposed workings to established communities as well as the associated landscape and amenity impacts. Yet, if appropriate, workable resources should be safeguarded to help secure a diverse energy mix and energy security. The sustainable restoration / after care of any extraction site to beneficial use must be secured and guaranteed. The LDP will take in to account any further Scottish Government guidance on this matter. The impacts of any extraction on communities, the environment and the built and natural heritage must be minimised and mitigated. The SDP requires the LDP to:
- Safeguard minerals from sterilisation where the deposits are of a sufficient scale or quality to be of potential commercial interest and their extraction is technically feasible and may be carried out in a way that is environmentally and socially acceptable;

⁴⁶ Scottish Planning Policy paragraphs 234 - 248

⁴⁷ SESplan SDP: Minerals Technical Note

- Identify areas of search for aggregate minerals and coal, or, where appropriate, specific sites, having regard to national guidance and other environmental objectives of the SDP.

7.45 The LDP should safeguard all workable mineral resources which are of economic value and ensure that these are not sterilised. These areas are identified on the plans at Appendix 3. Where possible and appropriate, LDP's should identify Areas of Search where surface coal extraction may be acceptable during the plan period and beyond, with particular emphasis on protecting local communities from significant cumulative impacts⁴⁸. Criteria based policies should be set out that specific proposal will need to address to ensure protection of the environment and to minimise landscape impact and the impact on visual amenity, traffic and on local communities, including cumulative impacts.

7.46 The SDP also requires the LDP to include criteria-based policies to assess mineral extraction proposals, including provision for restoration and enhancement. There is scope for some minor change to these existing local plan policies, for example to strengthen the requirements for restoration and aftercare and associated guarantees.

Methodology for Identifying a Potential Area of Search for Open Cast Coal Extraction in East Lothian

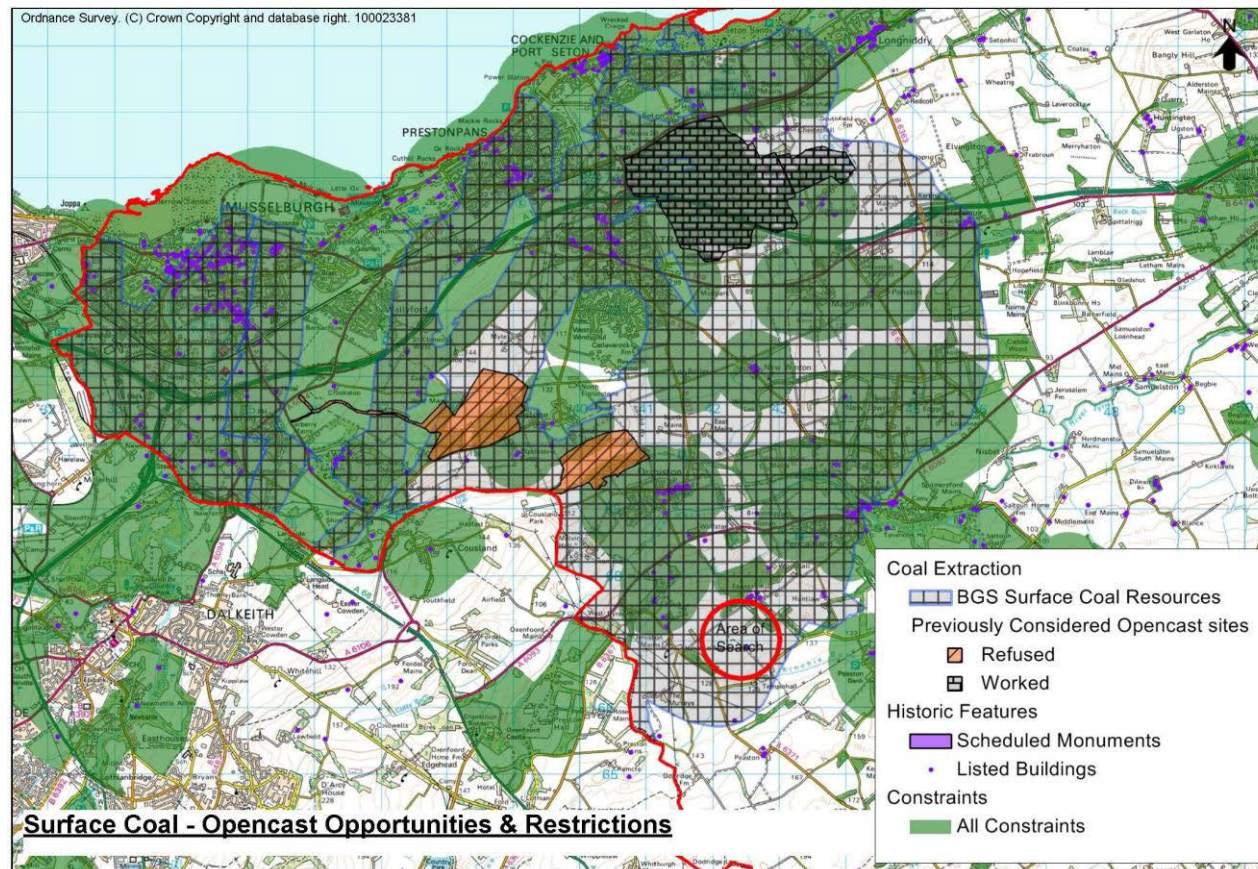
7.47 British Geological Survey has produced a map of the coal resource in East Lothian. This was used to identify a study area of where there may be coal deposits of potential commercial interest. Within this zone, it was necessary to consider 1) areas that require protection from extraction operations and 2) if there are any positive indicators for a part of the area (access to good rail/road links /opportunities for landscape restoration) that may suggest it should be considered as a potential location for extraction. Firstly, areas where coal extraction should not take place were sieved out of the study area. These areas are those surrounding existing communities and international, national or local sites designated as built or natural heritage assets.

7.48 Planning authorities can decide what constitutes a community. The groupings identified as communities are settlements identified in the current local plan and groupings of 10 or more houses. A 500m buffer around these has been used, including those outwith East Lothian. It is unlikely that a planning application within this buffer area for coal extraction would be successful. The groupings so identified were: Carberry, Crossgatehall, Cousland, Newcraighall, Queen Margaret University, Boggs Holdings, Ormiston Hall/West Byres, Smeaton, Goshen Farm Steading, Dolphinstone, Buxley Farm Steading, Elphinstone Tower Farm cottages, Greendykes, Penston and Seton. Where there are also groupings of less than 10 houses, or Individual houses, they would be protected by policy criteria; however, their existence may make obtaining planning permission less likely.

⁴⁸ Scottish Planning Policy paragraph 239

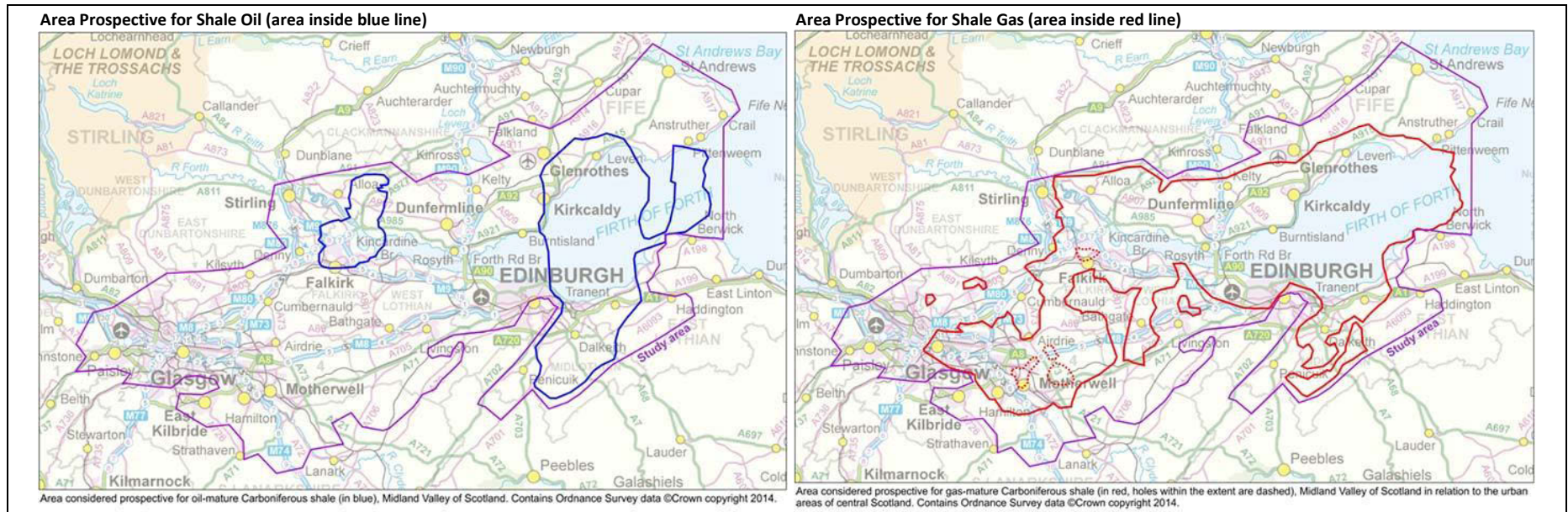
- 7.49 In terms of cultural and natural heritage, international designations such as Special Protection Areas, Special Areas of Conservation and RAMSAR sites have been sieved out of the study area. The same is true of national designations such as Sites of Special Scientific Interest, Gardens and Designed Landscapes, Scheduled Monuments and Listed Buildings. Peat and rare soils do not overlap the coal area, and there are no water supply catchment areas that affect the coal area. There are some areas that are affected by 1:200 year flood risk zones. The coal field is also contiguous with the Drinking Water Protected Area (Groundwater). There are also areas of ancient and semi-natural woodland in the area underlain by coal deposits. Local natural and cultural heritage assets which have also been sieved out of the study area include Local Biodiversity Sites, Conservation Areas and that part of the Green Belt within East Lothian.
- 7.50 Other factors which have been taken into account are that some employment locations may be sensitive to opencast workings. Some sites important for tourism, whether for accommodation or as an attraction could also be impacted by opencast workings. The strategic employment sites on or near the coalfield are at Old Craighall Business Park, Macmerry, and Blindwells are relevant. Some other existing employment or tourism sites may also be sensitive. These include Elphinstone Research Centre, Seton Sands Holiday Park, Old Craighall Travelodge, Carberry Tower, Adniston Manor, Drummohr Caravan site, Winton House, Levenhall Links Nature Reserve and Musselburgh Racecourse.
- 7.51 The plan on the next page illustrates some of these constraints / features / decisions and a potential area of search for open cast coal working which lies outwith these areas. Importantly however, following the above constraints mapping and in view of the constraints and characteristics of the area, the location of remaining unworked shallow coal deposits and previous Reporter's decision on the current local plan, the Council has concluded that there is no scope to identify any area of search for open cast coal extraction in East Lothian within which proposals would have a realistic prospect of support.
- 7.52 However, if an area of search were required to be identified, traffic and environmental impacts must be minimised. On this basis, the area covered by the mapped constraints was excluded as well as the area between Tranent, Macmerry, Pencaitland and Ormiston as it would not be suitable due to its likely visual impact and the need for traffic to route through Tranent or Pencaitland. A potential area of search for surface coal working is therefore at the location shown on the plan below.

7.53 Notwithstanding this, it is not clear if the potential area of search indicated on the plan below is underlain by deposits which are of sufficient scale or quality to be of commercial interest. It is also not clear if their extraction is technically feasible and could be carried out in a way that is environmentally and socially acceptable. A full assessment of the environmental effects and need for mitigation would be required at the level of any project - it is very likely that project level EIA would be required. However, it remains the Council's view that any open cast operation in any of these areas is likely to have unacceptable impacts.



Shale Oil and Gas

7.54 The British Geological Survey has recently produced plans indicating that areas in the west of East Lothian have potential for the working of shale oil and gas. The plans below illustrate the areas where there may be shale oil and gas deposits in East Lothian.



7.55 Key factors in the assessment of any such proposals will include the impact on neighbouring uses, communities and the environment, including the water environment, as well as on health and on amenity in general. It is proposed that the LDP will include a new criteria based policy that will seek to manage such operations while seeking to safeguard the environment and amenity.

7.56 It is likely that any such proposals would require Environmental Impact Assessment. In addition to assessing the impact of any such proposals on those considerations identified above, a particular focus of any assessments would include the identification of onsite activities that may pose a

potential risk, including the emission of pollutants and the creation and disposal of waste. As part of any such assessments, a source – pathway – receptor model should be used to monitor, manage and mitigate any identified risks.

7.57 One of the outputs of such assessments would be the identification of buffers zones between such operations and sensitive receptors such as existing communities, natural / cultural heritage assets and uses sensitive to / at risk from such operations. It would be for the planning authority, in consultation with other statutory consultees, to determine if such buffers zones are appropriate and sufficient. Where they are deemed inappropriate, planning permission would be refused.

Table 33: Minerals, Including Aggregates & Coal

Preferred Approach	<p>In relation to minerals, aggregates and coal, the preferred approach is as follows:</p> <p>Spatial Strategy approach:</p> <ul style="list-style-type: none"> • Do not identify an area of search for open cast coal extraction; • Approval of planning permission for an extension of Longyester sand and gravel quarry has increased associated reserves in East Lothian so no further action proposed other than to identify consented area and delete existing area of search for sand and gravel extraction; • Hardrock can be met from existing operational and non-operational quarries so no further action proposed other than to safeguard these existing extraction areas. <p>Policy approach:</p> <ul style="list-style-type: none"> • Develop policy to manage proposals for the extraction of shale gas or oil; • Clarify the role of restoration bonds / guarantees in relation to proposals for mineral workings.
Reasonable Alternative	<p>In relation to minerals, aggregates and coal, the alternative approach is as above, <u>but</u> in relation to an area of search for open cast coal:</p>

- | | |
|--|--|
| | <ul style="list-style-type: none">• An Area of Search may be identified south of the A6093 due to proximity to the trunk road network. However, it is not clear if a potential area of search there is underlain by deposits which are of sufficient scale or quantity to be of commercial interest or if extraction could be carried out in a way which would be acceptable. Features in this area, including individual houses, would be protected by criteria based policy. Based on the constraints mapping described above this is one of the areas not directly covered by the constraints listed. However, notwithstanding this, it remains the Council's view that any open cast operation in any of these areas is likely to have unacceptable impacts. |
|--|--|

Question 24: Minerals, Including Aggregates & Coal

In terms of the approach to minerals, do you support the preferred approach, the reasonable alternative, or neither?

Please explain your answer. If you support neither of the above options, what alternatives do you suggest?

Waste

- 7.58** The Scottish Government's Zero Waste Plan (ZWP) provides the national context regarding waste policy and how the planning system is required to consider waste. It contains ambitious targets for recycling of waste in Scotland and requires local authorities to plan for all waste streams, not just Municipal Solid Waste. This means that additional waste management facilities may be required to ensure that all types of waste are managed as sustainably as possible. SPP confirms the Scottish Government's position regarding waste policy and also sets out its position relating to proximity principle and need: essentially there is considered to be a 'national' need for waste management facilities.
- 7.59** SPP also expects development plans to set out a locational or spatial strategy for waste management development, either by allocating specific sites for waste management facilities, and/or indicating clearly and positively that land designated for employment, industrial or storage and distribution uses is appropriate for many waste management installations (subject to site specific considerations). SESplan notes that there is an estimated 20 year supply of residual landfill capacity, which is in excess of Scottish Government requirements. There is therefore no need for more during the plan period, unless justified in the context of the Zero Waste Plan and SEPA Landfill Capacity Reports. SESplan requires that Oxwellmains is safeguarded as a site for waste treatment facilities, and also advises that the function of operational waste sites should not be compromised. SPP confirms that development plans should give effect to the aims of the ZWP and also requires existing sites to be safeguarded⁴⁹.
- 7.60** The current local plan predates the national ZWP, and instead refers to the now superseded National Waste Plan and Area Waste Plans. The proximity principle and the concept of 'regional self-sufficiency' have now been amended by the ZWP and the BPEO concept is also no longer applicable. The local plan is therefore out of date on this topic and requires to be updated. Policy BUS1, which relates to business and general industrial land allocations, does indicate that waste management facilities may be permitted within such areas if they are compatible with employment use. However, no further locational guidance for waste management facilities is provided nor any criteria-based approach to the assessment of any such proposals. The adopted local plan does contain a requirement that the layout and design of certain types of new development makes provision for recycling facilities (policy DP23).

⁴⁹ Scottish Planning Policy paragraph 175 - 192

Table 34: Waste

Preferred Approach	The preferred approach is to comprehensively review the text of the local plan in respect of waste developments to reflect the new national policy context as set out in the ZWP and SPP. The LDP would prioritise employment locations as suitable in principle for many waste management developments, subject to criteria being met including amenity impacts on surrounding uses. Sites allocated for class 4 business uses only may not be suited to certain technologies, depending on their impacts. The policy requirements for recycling facilities to be included in site design and layout for will be retained (Policy DP23). Design guidance on waste storage, recycling and collection space will be provided. The use of site waste management plans for appropriate scales of development will also be promoted, to reduce construction and demolition waste. Existing and committed waste management facilities (including but not limited to Oxwellmains) will be identified in the LDP Proposals Map(s) and will be safeguarded. The LDP policies will be amended to clarify that inappropriate co-location should be avoided.
Reasonable Alternative	The alternative approach is to comprehensively review the text of the local plan in respect of waste developments to reflect the new national policy context as set out in the ZWP and SPP. The LDP would introduce a criteria based policy against which proposals for waste management facilities would be assessed, including amenity impacts on surrounding uses. Existing and committed waste management facilities (including but not limited to Oxwellmains) will be identified in the LDP Proposals Map(s) and will be safeguarded.

Question 25: Waste

In terms of the approach to waste do you support the preferred approach, the reasonable alternative, or neither?

Please explain your answer. If you support neither of the above options, what alternatives do you suggest?

Minor Policy Review & New Policies to be Introduced

7.61 The Monitoring Statement indicates where and how it is intended to promote for the LDP a minor review of existing local plan policies and the introduction of new policies, either in the LDP itself or in Supplementary Guidance. These are also listed in Appendix 6 below.

Question 26: Minor Policy Review & New Policies to be Introduced

The Monitoring Statement indicates where and how it is intended to promote for the LDP a minor review of existing local plan policies and the introduction of new policies, either in the LDP itself or in Supplementary Guidance. Do you have any comments on these proposals? Please indicate which policies you are referring to.

Do you have any other comments to make?

Question 27: Other Comments

Finally, do you have any other comments to make on the Main Issues Report that are not covered by the previous questions?

1 Scottish Planning Policy:

SPP states that LDPs should allocate land on a range of sites which are effective or expected to become effective to meet the housing land requirement up to year 10 from the predicted year of adoption, ensuring a minimum of 5 years effective land supply at all times (paragraph 119).

2 Extract from Planning Advice Note 2/2010: Affordable Housing and Housing Land Audits, paras 55-56:

“To assess a site or a portion of a site as being effective, it must be demonstrated that within the five-year period beyond the date of the audit the site can be developed for housing (i.e. residential units can be completed and available for occupation), and will be free of constraints on the following basis:

ownership: *the site is in the ownership or control of a party which can be expected to develop it or to release it for development. Where a site is in the ownership of a local authority or other public body, it should be included only where it is part of a programme of land disposal;*

physical: *the site, or relevant part of it, is free from constraints related to slope, aspect, flood risk, ground stability or vehicular access which would preclude its development. Where there is a solid commitment to removing the constraints in time to allow development in the period under consideration, or the market is strong enough to fund the remedial work required, the site should be included in the effective land supply;*

contamination: *previous use has not resulted in contamination of the site or, if it has, commitments have been made which would allow it to be developed to provide marketable housing;*

deficit funding: *any public funding required to make residential development economically viable is committed by the public bodies concerned;*

marketability: *the site, or a relevant part of it, can be developed in the period under consideration;*

infrastructure: *the site is either free of infrastructure constraints, or any required infrastructure can be provided realistically by the developer or another party to allow development; and*

land use: housing is the sole preferred use of the land in planning terms, or if housing is one of a range of possible uses other factors such as ownership and marketability point to housing being a realistic option.

56. Programming of sites is an important element of the audit. Programming is an indication of the expected annual completions on each site, taking account of the lead-in times, the ability of the site to be developed, and the capacity of the local housing market. The housing land audit should show the expected completions on sites over the following five years. The contribution of any site to the effective land supply is that portion of the expected output from the site which can be completed within the five-year period. It will be important that the programming is also related to the expected timing of housing land allocations in the local development plan.”

3 Extract from Scottish Government’s Chief Planner’s letter dated 2 November 2010 to Heads of Planning in Scotland:

“The concept of ‘effective housing land’ centres on the question of whether a site can be developed i.e. whether “residential units can be completed and available for occupation” (Planning Advice Note (PAN) 2/2010: Affordable Housing and Housing Land Supply paragraph 55). The PAN also says an effective site has to be free of seven specified constraints and bearing in mind the current economic climate I would like to draw your attention to the following extracts:

Ownership – the site is in the ownership or control of a party which can be expected to develop it or release it for development;

Physical – the market is strong enough to fund the remedial work required;

Deficit funding – any public funding required to make residential development economically viable is committed by the public bodies concerned;

Marketability – the site or a relevant part of it can be developed in the period under consideration;

Infrastructure – any required infrastructure can be provided realistically by the developer or another party.”

Retention of distinctiveness of lowland and upland areas:

There is a strong, established pattern of wind turbine development in East Lothian, with large scale development in the expansive upland landscapes, and smaller scale development in the lowlands. Large scale development outwith the Lammermuir area would disrupt this distinction between landscape types. Larger scale development in the lowlands would risk trivialising the existing small scale development. Large scale development in the lowlands as well as the uplands could lead to East Lothian being defined by wind development instead of it being a component of the landscape.

Retention of distinctiveness within Scotland

It is important for the different landscapes of Scotland to remain distinctive both within their locale and both regionally and nationally. The existing pattern of development in East Lothian is different from that in Fife, Scottish Borders and Moray. The Lammermuir edge provides a boundary between the central belt and the Scottish Borders, with panoramic views at the fault line across Lowland Scotland. The distinction of these different landscapes is obvious to walkers and road travellers alike. This could be compromised by larger scale wind development in the lowlands.

Pattern of existing development and Relief from development

Existing large scale windfarms in the Lammermuirs around East Lothian are stepped back from the Lammermuir edge and have some degree of containment. They are in a 'cluster and space' pattern. Further wind farm development in the Lammermuir area, especially stand alone development, risks there being few or no areas within the East Lothian Lammermuirs which are not significantly impacted or dominated by windfarm development. It is important that some part of the landscape is retained for future and existing generations to enjoy. This is especially the case as the Lammermuirs have some of East Lothian's wildest land in terms of remoteness, naturalness and lack of modern artefacts.

Lammermuir skyline

Windfarm development on the skyline can be prominent. From parts of the East Lothian plain a considerable proportion (over half) of the skyline is affected by wind development. There are three main issues; firstly, the skyline should continue to appear as the dominant feature; secondly, wind development should continue to appear set back from the Lammermuir edge; and thirdly, spacing between windfarms should be maintained.

Oldhamstocks Conservation Area

The area in and around Oldhamstocks Conservation area is affected by existing and consented wind development. Cumulative impact on this village is a matter of concern and the Council is seeking to resist further proposals that would have an adverse effect on the setting of the conservation area.

Cumulative issues for smaller wind turbines were:

Clutter

Capacity for visual clutter in association with large and complex industrial buildings of the cement works, quarrying, Cockenzie Power Station, Power lines, transmission masts (e.g. Garleton Hills) and smaller scale elements such as pylons and transmission masts; and related impact on the landscape pattern and scenic attraction of the area. This could occur with an individual wind turbine in association with other existing development but would certainly occur if turbines were associated with the majority of land holdings.

Domination of local character

Effect on the scenic attraction of different character areas: e.g. the simplicity and openness of the agricultural plain, intricacy of river valleys; or on pattern of woodland and trees within the North Lammermuir Platform. The larger the turbine, the harder it is likely to be to accommodate a number of them without them becoming the dominant features. Intervisibility of developments would limit capacity in open and highly visible areas

Skyline

The proportion of open sweeping hills to developed skyline is an issue, both views towards the Lammermuirs from the lowlands and foothills, and within the hills. Different scale and speed of turbines on a prominent or important skyline can become a visual distraction and affect visual amenity.

Range of designs and scales in proximity

This can lead to clutter, discordance and visual confusion with different style, sizes, structure and blade movement.

Fragmentation of existing pattern of development

Where turbines do not relate well to existing buildings and point features in the landscape this affects the robust, recognisable, consistent and characteristic pattern of development. It also includes the effect of spread of built development for example development in the open spaces north of the A1 in the Musselburgh Prestonpans fringe or along A1 corridor could affect the perception of where built/industrial development ends.

Sequential effects

There are potential sequential effects on the experience of travelling in particular for the A1, A68, B6355 (Gifford to Whiteadder Road) the East Coast Mainline and the John Muir Way.

Discordance in Scale and location with existing development

This would apply to small scale development in most of the upland character areas (Lammermuir Plateau and Plateau Grassland). it would also apply to larger scale development in the lowlands.

Visual effects with existing and consented development in the Lammermuirs

This includes cumulative impacts such as development apparently spilling over the Lammermuir edge, as well as scale, design and rotation speed issues with development in the same view from important view points.

Visual Relief

It is desirable to retain some visual relief from wind turbine (and potentially other man-made infrastructure) development, in the uplands provided by Spartleton, Whiteadder valley, Lammerlaw. Diminishment of the unity and integrity of remaining hill tops in East Lammermuir Plateau should be avoided. This is provided at present by the Whiteadder and Hopes valleys, and Lammer Law and Spartleton to some extent. Visual relief is also important in the lowland context.

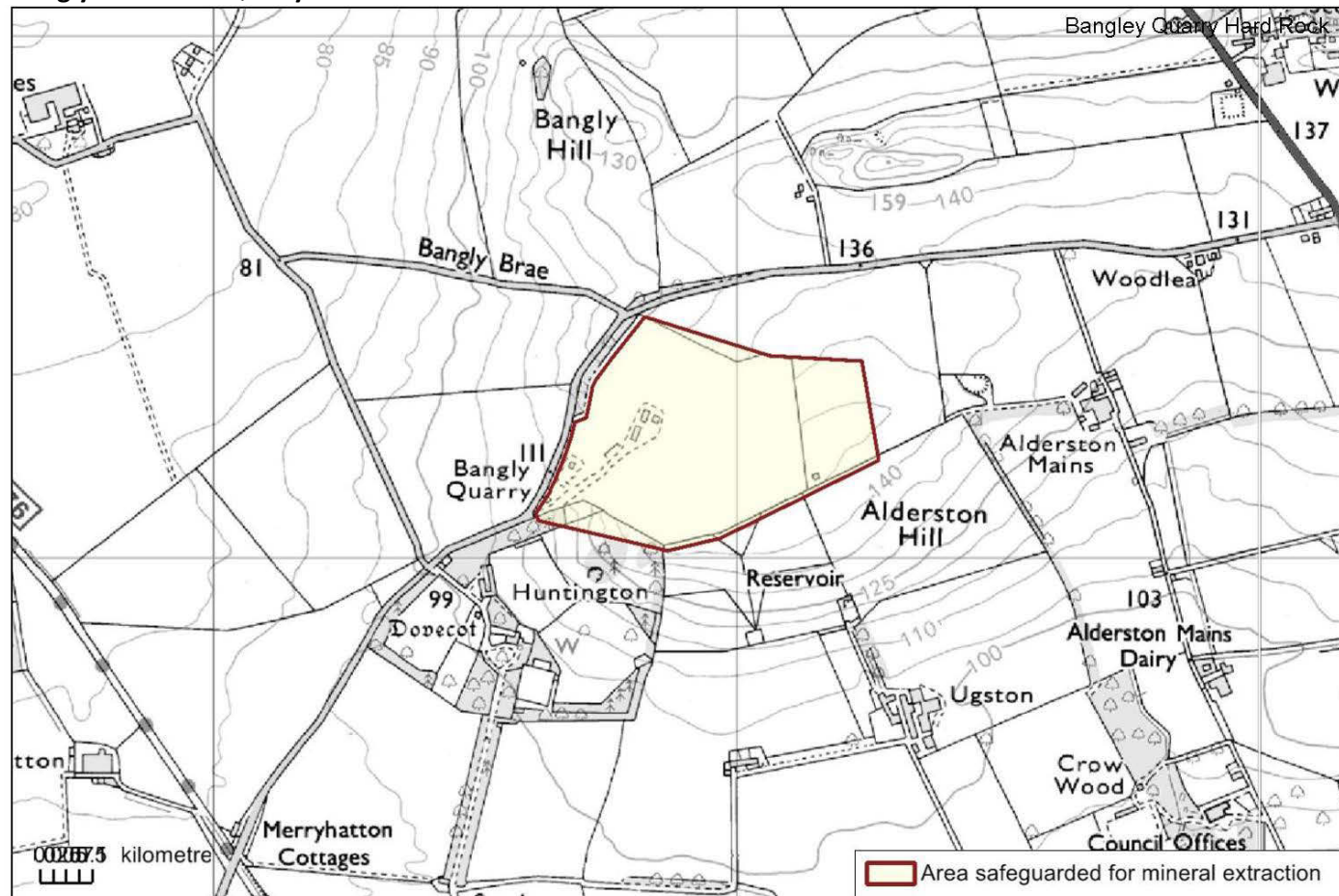
Containment of existing windfarm development

This applies particularly to development at Dun Law/Pogbie where the rim of the scarp is an important 'edge' and Aikengall/Crystal Rig and Fallago, where the Lammermuir edge provides some containment.

Visual Confusion

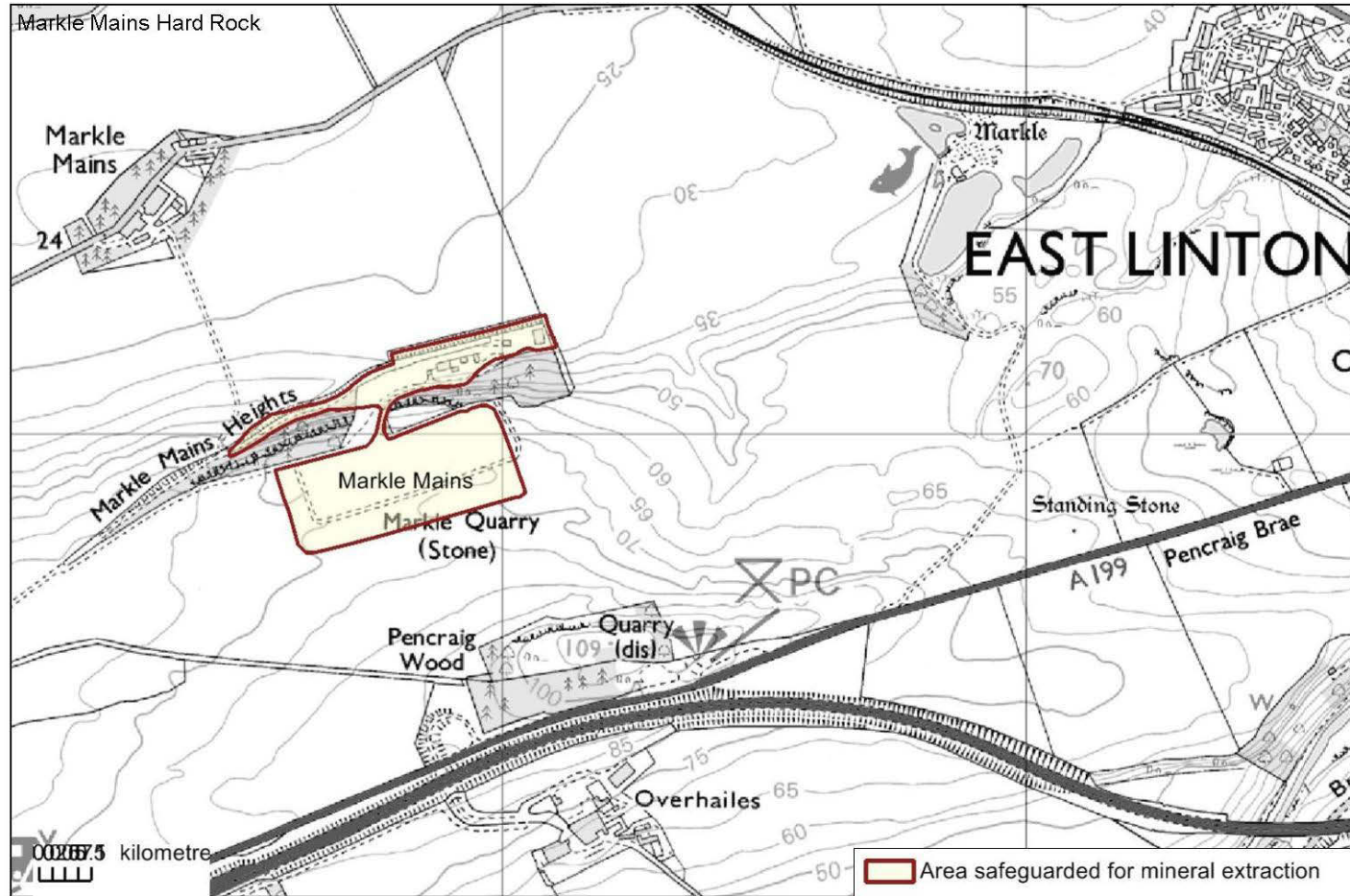
Wind clusters of more than 3 turbines up to 20m would have cumulative impact with itself as the speed of blade movement seen on mass is likely to be visually confusing and distracting.

Bangly Hard Rock Quarry

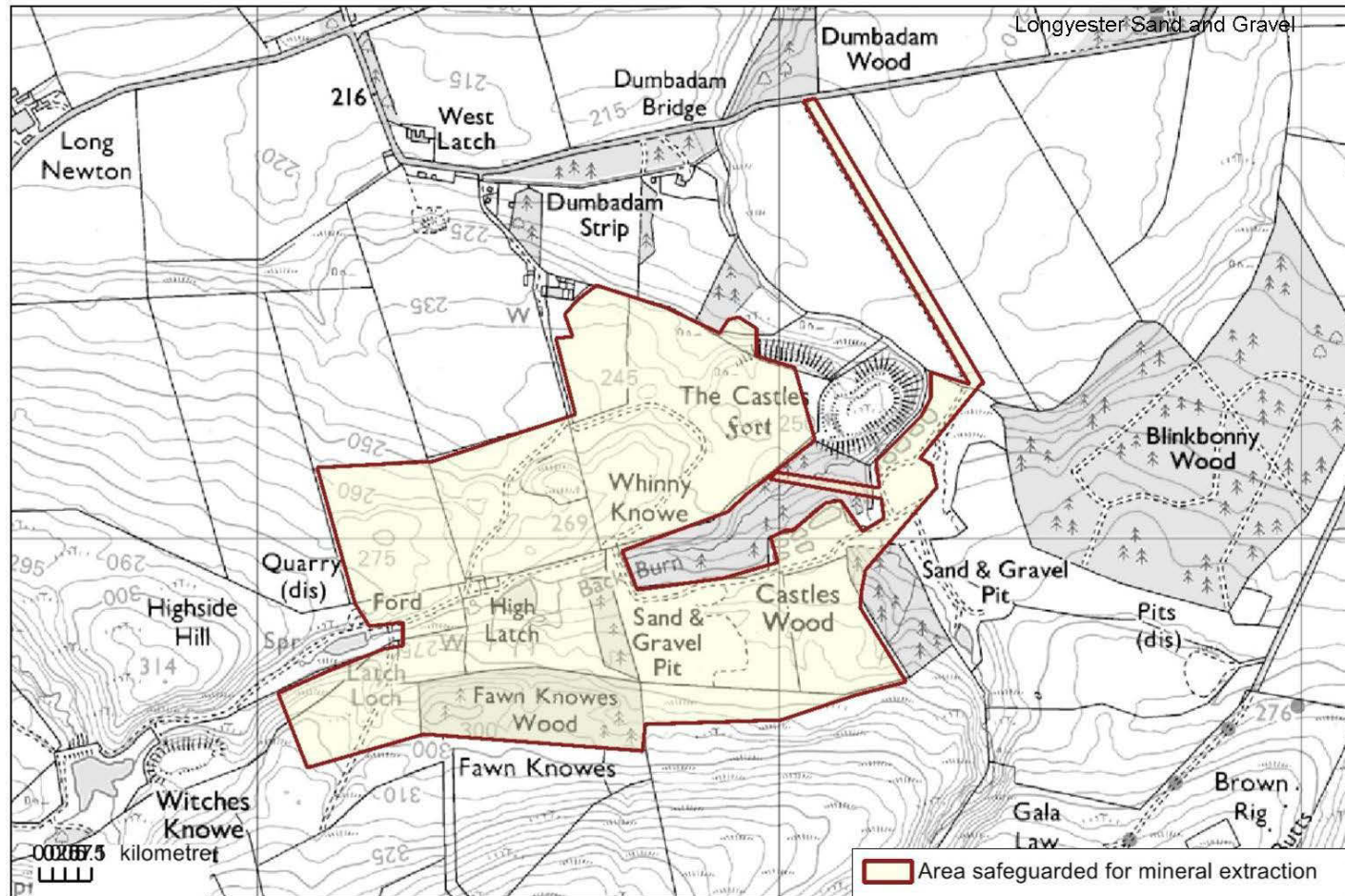


Markle Mains Hard Rock Quarry

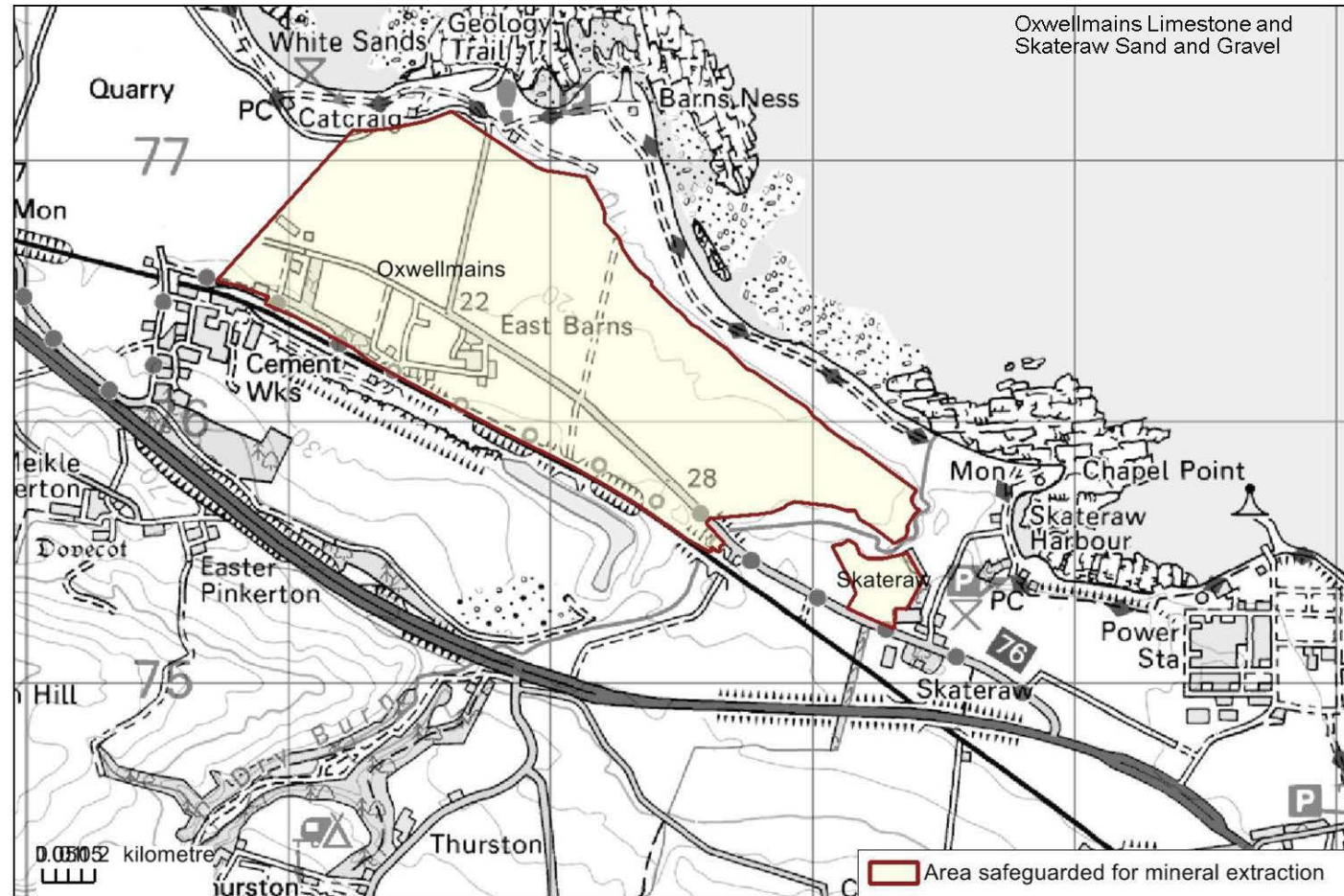
Markle Mains Hard Rock



Longyester Sand and Gravel Quarry



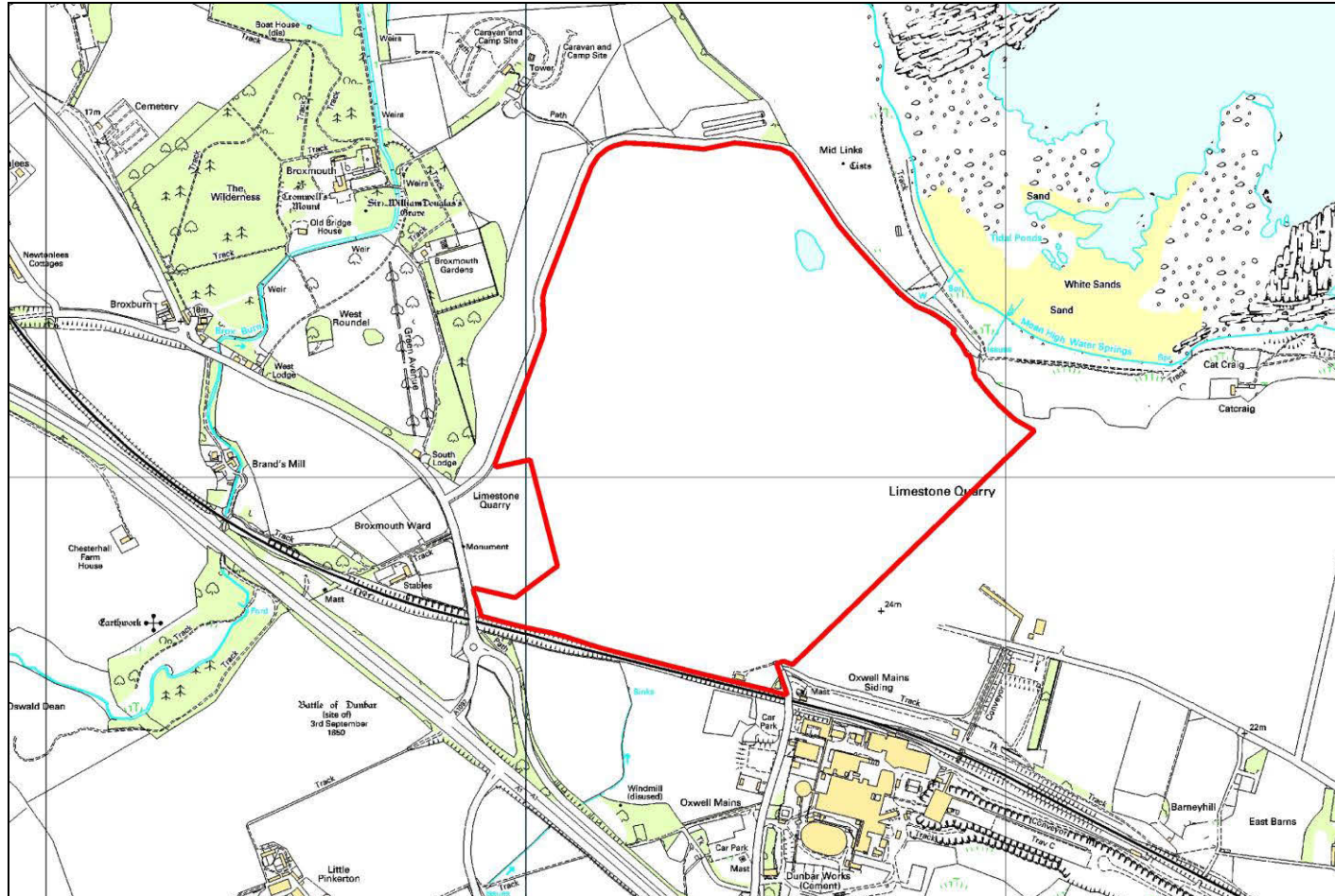
Oxwellmains Limestone & Skateraw Sand & Gravel Quarries



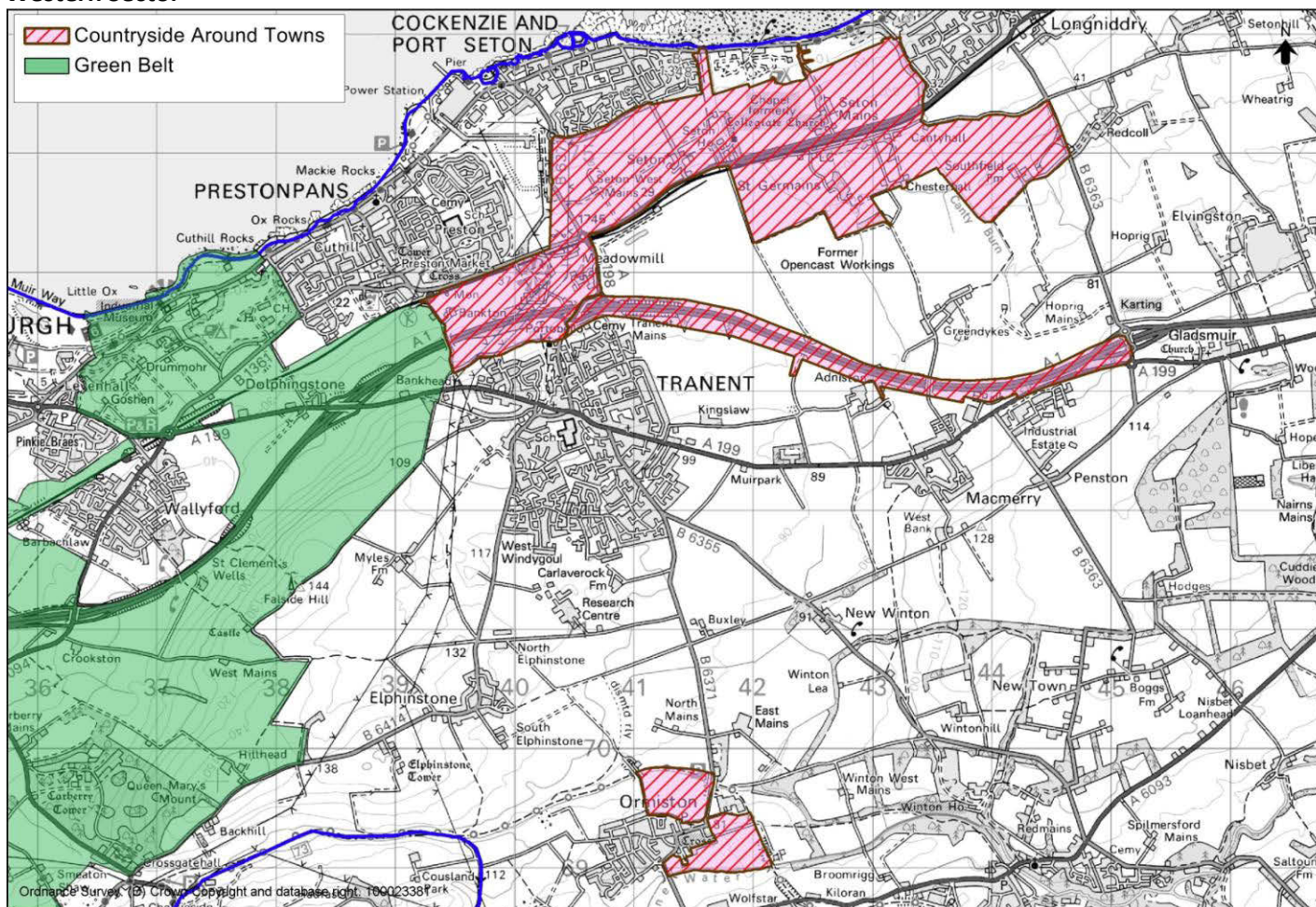
Levenhall Local Nature Reserve



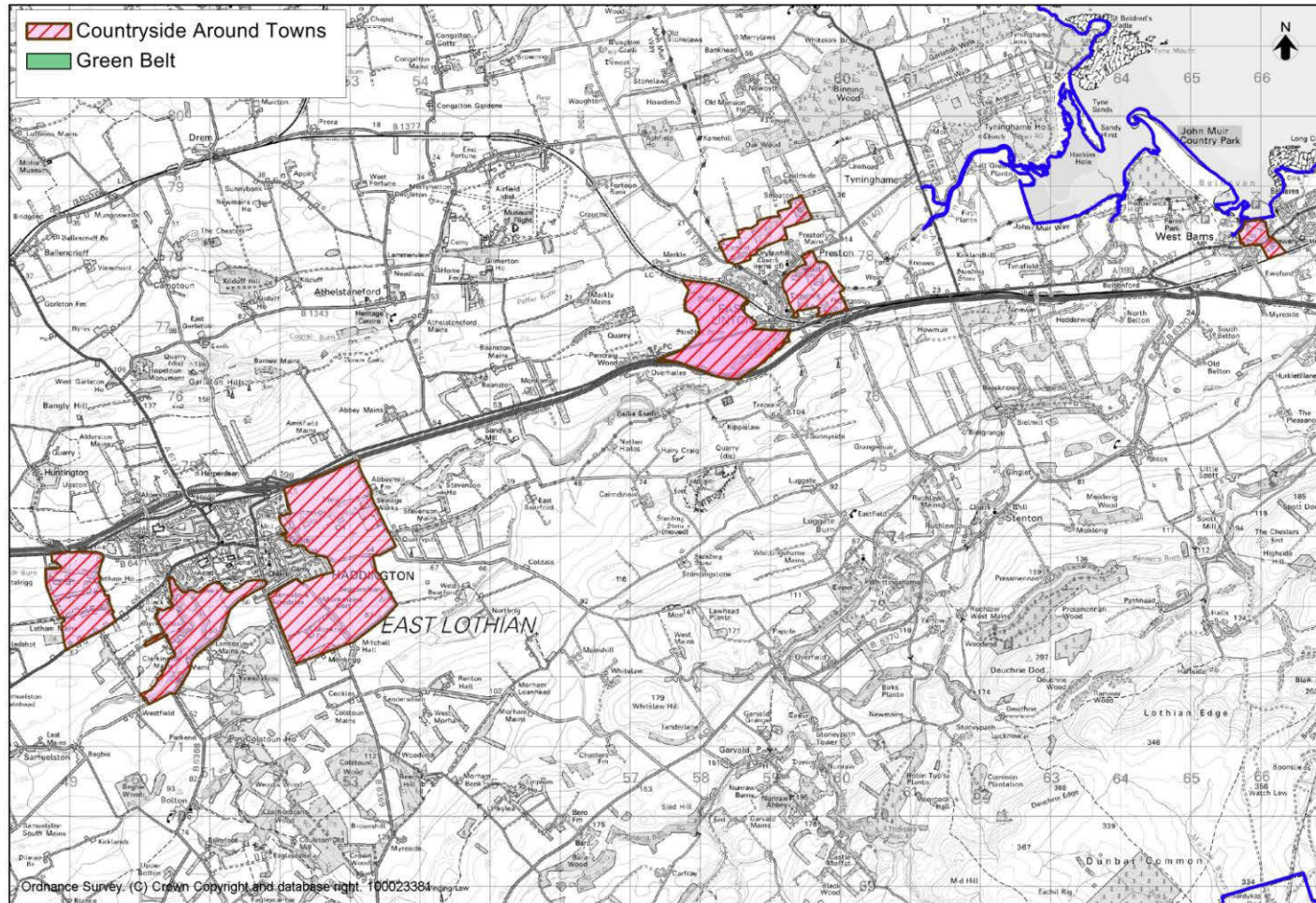
Whitesands



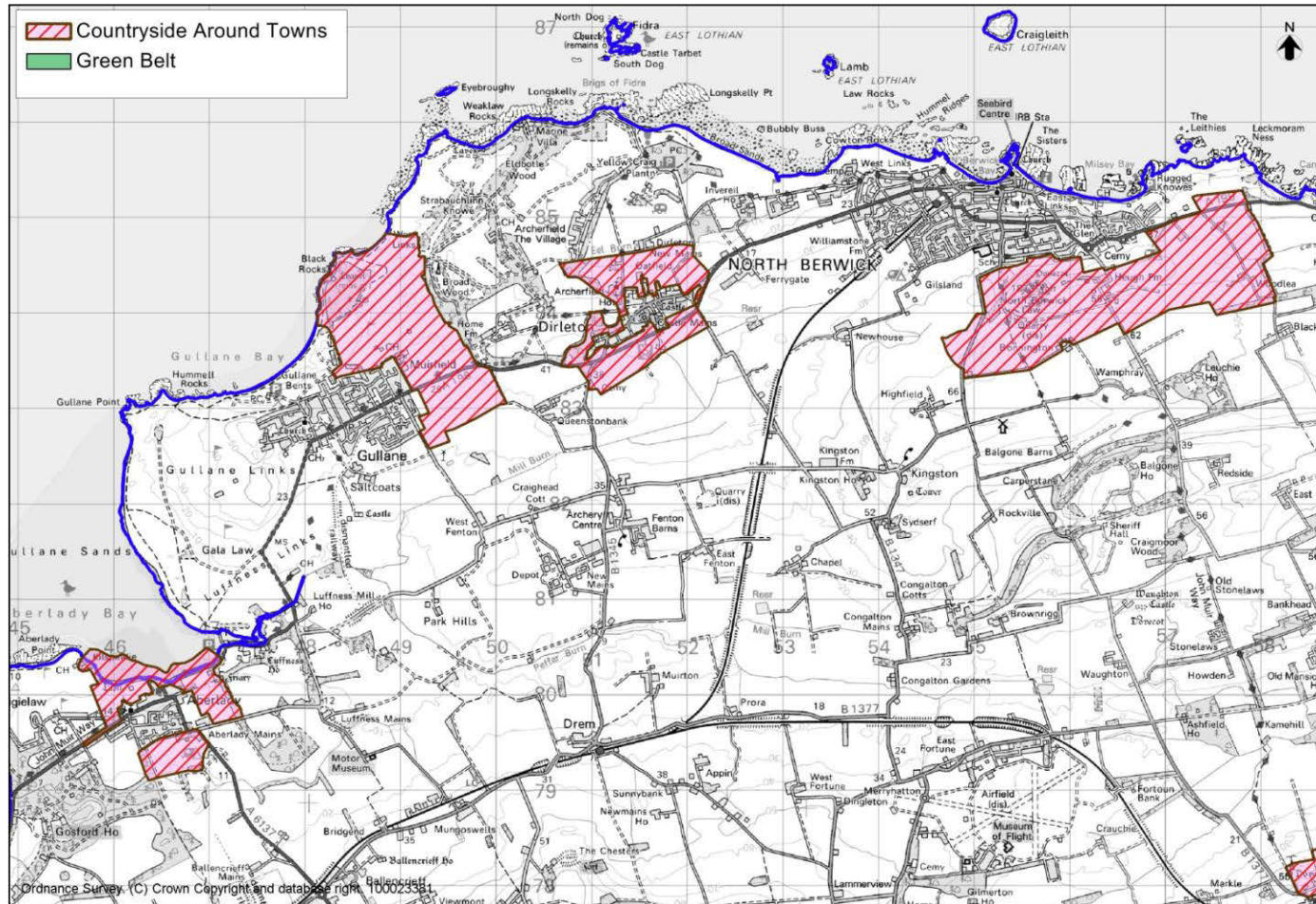
Western Sector



Inland Settlements



Coastal Settlements



List of Existing Local Plan 2008 Policies Requiring Minor Review (please see Monitoring Statement)

1. Development in the Countryside
2. Development in the Edinburgh Green Belt
3. Internationally Protected Areas
4. Sites of Special Scientific Interest
5. Wildlife and Geological Areas
6. Important Local biodiversity Sites
7. Protected Trees
8. Watercourses and Wetlands
9. Residential Character and Amenity
10. Town and Village Centres, Other Retail or Mixed Use Areas
11. Development in Conservation Areas
12. Gardens and Designed landscapes
13. Former East Fortune Hospital
14. St Joseph's School Tranent
15. West Harbour Area Cockenzie
16. Business and General Industrial Allocations
17. Business Class Locations
18. Kirk Park Inveresk
19. Former Oak Tree Filling Station Haddington
20. Archerfield Estate
21. Hotels
22. New Shops
23. Protection of Local Shops
24. Preferred Area of Search for Sand and Gravel Longyester Farm
25. Surface Mineral Extraction Criteria
26. Restoration

27. Electricity Generating Stations
28. Wind Turbines
29. Oxwellmains
30. Infrastructure and Facilities Provision
31. Scottish Fire Training School Gullane
32. Haddington Flood Plain
33. Housing Quality and Design
34. Development Frameworks
35. Affordable Housing
36. Schools
37. Minimum Open Space Standards for New General Needs Housing Development
38. Play Space Provision in New General Needs Housing development
39. Protection of Open Space
40. Protection of Potential Areas of Open Space
41. Core Paths and Other Routes
42. Musselburgh Lagoons
43. Prestongrange Museum
44. Museum of Flight
45. Development Location and Accessibility
46. General Transport Impact
47. Longniddry-Haddington Route Safeguard
48. A1 Trunk Road Roadside Facilities
49. All Development Policies

List of New Policies to be Introduced (please see Monitoring Statement)

1. Air Quality
2. Protection of Battlefields
3. Countryside Around Towns
4. Designation of Local Geodiversity Sites;
5. Special Landscape Areas (to replace Areas of Great Landscape Value);
6. Gypsy/Travellers
7. East Linton Station Safeguard
8. Energy including Renewable Energy
9. Low and Zero Carbon Generating Technologies in New Buildings
10. Extraction of Shale Gas or Oil
11. Waste Water
12. Soils



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