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Additional information:

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

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

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Proposed East Lothian Local Development Plan Schedule 4 Representation Responses

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

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

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

For further information or advice, please contact:

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

From:
To: [Local Development Plan](#)
Cc: [Policy & Projects: "](#)
Subject: East Lothian Council Proposed LDP Representation related to PROP NK11 Castle mains, Dirleton for Muir Homes Limited
Date: 02 November 2016 13:32:33
Attachments: [Proposed LDP Submission Text 10-16 Castle mains Site.pdf](#)
[C Mains Document 1 - Views of Dirleton Castle from the A198 Arterial route.pdf](#)
[C Mains Document 3 - Dirleton Landscape Appraisal-RevB IWA.pdf](#)

Please find attached a representation on behalf of **Muir Homes Limited**, Muir House, Belleknowes Industrial Estate, Inverkeithing, Fife KY11 1HY related to **PROP NK11 Castle mains, Dirleton**. This representation comprises a statement outlining the changes sought to the Proposed LDP along with the reasoning for seeking changes, and 3 related documents as follows: -

Document 1 – Views of Dirleton Castle from the A198

Document 2 – Accident on Station Road

Document 3 – Landscape and Visual Appraisal of Development Capacity - Dirleton

Grateful if you could confirm receipt.

Kind Regards

Malcolm Smith

Director

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EAST LoTHIAN PROPOSED LOCAL DEVELOPMENT PLAN

REPRESENTATION ON BEHALF OF MUIR HOMES LIMITED RELATED TO LDP “PROP NK11 CASTLEMAINS, DIRLETON”

CHANGES TO PROPOSED LDP BEING SOUGHT: -

- **PROP NK11 Castlemains, Dirleton**, related to the allocation of the subject site for residential development, **should be deleted from the Local Development Plan**. The area of land should be retained outwith the defined settlement boundary of Dirleton within the area protected by the “Countryside around Towns Policy”. The site should also be specifically protected from development by introducing a safeguarding restriction in order to protect the setting of Dirleton Castle and the setting of Dirleton and its Conservation Area when viewed from the main A198 arterial route.

SUPPORTING CASE

1.0 Background

1.1 It is a key requirement of National Planning Policy (NPF3 and Scottish Planning Policy (SPP)) that, in addition to the delivery of development to meet the social and economic needs of communities, appropriate safeguards are put into place in order to protect the integrity/character of place and the overall value of the historic environment. Against a background of the need to provide for more homes, there is clearly an obligation to ensure that the location and form of new development is appropriate with site selection and related impacts being fully assessed and understood as part of the LDP process otherwise the credibility of the process and confidence in the planning system is undermined.

1.2 The Policy principles set out in SPP include protection of the historic environment including preventing development which would have a negative impact on scheduled monuments and listed buildings and their settings. NPF3 recognises the contribution made by our cultural heritage to our economy, cultural identity and quality of life and confirms the positive role the planning system has to play in maintaining the distinctive and irreplaceable historic places which contribute to our sense of identity and are an important tourist resource. An underlying Policy Principle of SPP is the care of the historic environment including the settings of valued structures and ensuring (as per the primary legislation) that development in Conservation Areas preserves or enhances the character or appearance of such areas. To fail in any of these requirements is reason for development not to be supported

1.3 The LDP correctly identifies the need, in conjunction with the compact growth strategy, to provide for new development within the eastern parts of the LDP area, such development to be located/delivered in order to ensure related benefits to local communities and to assist housing delivery targets. The LDP also recognises the need for infrastructure to be available (or be made available) in order to serve new development and the benefits of utilising existing capacity where possible.

1.4 With respect to the Plan's stated "*Vision, Aims, Objectives and Outcomes*" these include: -

- To ensure that new development respects the character, appearance and amenity of the area, including its settlements and their settings; and
- To ensure that the design of new development reflects the sense of place and identity of the local area, and is properly integrated with its surroundings in terms of movement as well as form, appearance and use of materials, while contributing to wider sustainability and place making objectives.

2.0 The LDP Main Issues Report Stage

2.1 The site selection process underpinning the Proposed LDP emerged at/following the Main Issues Report stage. To inform site selection/preferences, East Lothian Council produced a detailed "Interim Environmental Report" (IER), Appendix 9 of which related to the North Berwick area (including Dirleton). The IER indicated that it provides "... *an objective assessment of the planning merits and strategic environmental assessment of potential development sites submitted for consideration as part of the LDP process*". The IER further states that "*To help inform the MIR a comprehensive assessment of all sites has been carried out. All sites were assessed in the same way ... to assess how suitable a site may be for development.*" In short, detailed site assessment was carried out in order to identify the most appropriate sites for development, this then being reflected (in theory) in the MIR.

2.2 The MIR identified a preferred development site at Castlemains, Dirleton (PREF-N4), this now being PROP NK11: Castlemains, Dirleton which is the subject of this objection, and a reasonable alternative at Foreshot Terrace (ALT-N3) which is the subject of a separate representation to the Proposed LDP. As will be demonstrated in section 3 below, the IER assessment fails to identify Castlemains as the preferred site and, despite this and no other assessment displayed within the emerging LDP or any supporting documents, this site (for reasons which are far from clear) remains that considered the most appropriate for new development in Dirleton. Unfortunately, this is at odds with the emerging Plan's stated "*Vision, Aims, Objectives and Outcomes*" (refer paragraph 1.4 above).

2.3 The merits of further development in the village of Dirleton have been noted through the LDP process. Dirleton, a village of around 500 - 550 residents lying on the A198 between North Berwick and Gullane, contains a Primary School (with available capacity), a church with hall, 2 licensed eateries, a bowling green/club, and visitor attractions (Dirleton Castle, Yellowcraigs beach and Caravan Park). Within close proximity to the village is North Berwick (including a range of commercial facilities and the closest rail station) circa 2.5 miles, with the Archerfield Estate and the array of leisure facilities (including 2 golf courses) also very close to the village. In short, Dirleton retains a range of local facilities (which would benefit from additional patronage) and is readily accessible to a wide range of commercial, leisure, transport, employment and community facilities within the local area. The designated Conservation Area, dominated by the Castle and the Green, is a potential constraint to development but, as with development in most Conservation Areas, it will be the location, scale and form of development that will ultimately determine the appropriateness of new development.

3.0 The PROP NK11: Castlemains, Dirleton site

3.1 This site lies to the east of Dirleton Castle with significant levels of intervisibility from/across the site to the castle. Views of Dirleton Castle and the village/Conservation Area from the main A198 across the Castlemains site are integral to the setting of the village/castle when viewed from this main arterial route. There are also valued views from Station Road and Castle Mains Place across the site to Dirleton Castle (the key feature of the designated Conservation Area). The village's setback from the A198, interspersed with agricultural land, is the prevailing characteristic of views to the village along this southern edge. The identified Castlemains site has no containment or logical boundary to the south and, due to its prominence from the A198, no matter the nature of the development within this site, it will be highly visually prominent to the obvious detriment of the setting of the village of Dirleton, including Dirleton Castle and Dirleton Conservation Area. The views into and impressions of the village would be seriously and detrimentally altered by development at this location thereby undermining, to some extent, Dirleton's positive contribution to the character/quality of the local area.

3.2 In initially proposing the allocation of the Castlemains site for 30-35 houses in the MIR, it was stated that: -

"Land at Castlemains Place Dirleton is a preferred land release, subject to education capacity. The site could be promoted for the 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”.

3.3 Unfortunately, the above proposed allocation fails to take a number of underlying matters of concern into account, this remaining the case for the subsequent allocation in the Proposed LDP. As set out in the Interim Environmental Report (IER) underpinning the site allocation, with respect to “Cultural Heritage” it is noted that: -

“The site is within Dirleton Conservation Area and adjacent to Dirleton Castle scheduled monument, listed buildings and garden and designed landscape. Historic Scotland has commented that development of the site could change the character of the conservation area and a design strategy ...would be needed in order to allow for a full assessment of any potential impact and change. Historic Scotland also has strong concerns about the impact of the proposed development on the setting of Dirleton Castle”.

3.4 In addition, with respect to “Landscape” impact, it is noted that: -

“There is no natural boundary to define the southern boundary and the impact of development would need to be mitigated by hedgerow and tree planting. The development of the site would result in encroachment into the rural landscape and could adversely affect the landscape setting of Dirleton Castle. SNH has raised concerns about the impact the development of this site would have on the contained nature of the village with houses currently generally being set well back from the A198.”

3.5 The assessment set out by East Lothian Council in the IER further confirms that “*The site’s development would be likely to have significant impacts on the landscape*”. In short, with reference to all of the above, there are significant concerns highlighted by East Lothian Council, Historic Scotland, and SNH related to the impact of any potential development within this site on the setting of Dirleton, the protected Dirleton Castle (which sits at the core of the Conservation Area) and the character and appearance of the designated Dirleton Conservation Area as a whole. There is no reasoned assessment by which to conclude that “*...a section of the site to the north may be developed without harming these characteristics...*” as there is simply no evidence to this effect. Neither is it possible to conclude that a design solution would be possible to address the underlying negative impact of the proposed allocation/development on the village and its setting. In short, this is a poorly defined/contained site in a prominent location at the edge Dirleton, the development of which would adversely impact on the setting of the village, the Conservation Area and the castle, and there can be no comfort that an appropriate form of development could be achieved, indeed all signs indicate otherwise. Development on this site would also contravene SESplan Policy 7 due to the related impacts on Dirleton.

3.6 In allocating the site, Proposal PROP NK11 requires “...a comprehensive masterplan ...that conforms to the relevant development brief...” in order to inform the development of this site. The development brief proposed in the emerging LDP details a range of constraints with respect to the positioning of development within the site, the need to “retain views to Dirleton Castle”, the form of development that may be acceptable (restricted to single and 1.5 storey buildings), access, landscaping and design/materials. The need to “retain views to Dirleton Castle” effectively rules out development on much of the southern section of the identified site (this requirement being applied from the junction of Station Road and the A198 westwards along the A198 road frontage) albeit it remains unclear why views from Station Road to Dirleton Castle are not also afforded protection. Document 1 shows the line of sight to Dirleton Castle across the Castlemains site, this precludes significant areas from development and raises the question of whether this is a viable development site taking all the relevant constraints into account. Access also remains an issue wherein, in the development brief, this is now to be taken from Station Road via a short section of Castlemains Place despite this previously being considered unacceptable at the MIR stage (refer paragraph 3.2 above).

3.7 Bearing in mind the sensitivity of this site and the range of constraints, the form of a recent planning application for the development of this site is relevant. This effectively comprised a range of largely 2 storey height buildings (36 units) occupying pretty much all of the site and with insufficient regard to the constraints set out in the LDP development brief, including the impact on the setting of Dirleton Castle. Access was to be formed via a new access onto Station Road close-by its junction with the A198, raising a range of road safety concerns. This is not a safe junction as evidenced by a recent accident (Document 2 – Accident on Station Road)

4.0 Other Development Options

4.1 Informed by a Landscape and Visual Appraisal of Development Capacity in Dirleton (Document 3) prepared by IWA Landscape Architects and the range of sensitivities related to the proposed Castlemains site identified above, it is clear that an alternative development site, that at Foreshot Terrace (assessed as reasonable alternative ALT-N3 at the MIR stage), is a more appropriate location for new development in Dirleton. The alternative site at Foreshot Terrace offers the opportunity to deliver a fully integrated development of quality complementary to the Conservation Area and with no adverse impact on Dirleton Castle or its setting. This development would represent an infill within established development on a site well contained/defined on 3 sides with positive provision for a landscape edge on the fourth side (North) to define the long term boundary of Dirleton. This issue is subject to a separate representation to the emerging LDP.

5.0 Conclusions

5.1 In short, this prominent and unjustified proposal at Castlemains, Dirleton (PROP NK11) should not be supported in light of the significantly detrimental impacts that would arise on the setting of Dirleton, the character and appearance of Dirleton Conservation Area, and the setting of Dirleton Castle. To do otherwise would patently fail to meet the requirements of Scottish planning policy and the underlying basis of the emerging LDP's "*Vision, Aims, Objectives and Outcomes*" (refer paragraph 1.4 above) with respect to the underlying commitment to the protection of the built/historic environment. It is clear from the initial assessments by East Lothian Council, Historic Scotland, and SNH that this site is not supportable and it is also noted that development in this location would also contravene the emerging LDP's Cultural Heritage policies including Policy CH1 (Listed Buildings), CH2 (Conservation Areas), and CH4 (Scheduled Monuments).

5.2 The development constraints impacting this site, including the terms of the LDP draft development brief, also question the viability/deliverability of a compliant development, and there is certainly no basis to conclude that a development could be delivered without significant impacts on the village, its setting, the castle and the designated Conservation Area.

5.3 The existence of an alternative site in the village with none of the related negative impacts arising with respect to the Castlemains development is also a significant consideration. As outlined in a separate representation, the site at Foreshot Terrace is better located and would have far fewer impacts on the character of the village while delivering beneficial new development within the community. There is therefore no overriding need to compromise the setting/character of the village and allocate PROP NK11 for development. Indeed, in light of the sensitivity of this site it should be specifically protected from development by introducing a safeguarding restriction in order to protect the setting of Dirleton Castle and the setting of Dirleton and its Conservation Area when viewed from the main A198 arterial route.

DOCUMENTS

Document 1 – Views of Dirleton Castle from the A198

Document 2 – Accident on Station Road

Document 3 – Landscape and Visual Appraisal of Development Capacity - Dirleton

Land to the south of Castlemains Place

Description

An open agricultural greenfield site of 2.3 hectares in area, dipping northwards from the A198. The site is highly visible from the A198 as there is no existing natural boundary to the road. The northern edge has a beech hedge with regularly spaced trees, and the properties along Castlemains Place behind. Mature hedging runs along the boundary of Station Road. To the west of the site are a significant number of mature trees alongside the lane and in the grounds of Castlemains farm.

The site currently offers open views southwards across the agricultural landscape and south-eastwards towards Berwick Law.

Dirleton Castle lies to the west, beyond Castlemains Farm; it sits on an elevated rocky outcrop and is thus visible from almost the whole of this site and from the adjacent A198.

1. Distant views from the east to Berwick Law.
2. Station Road hedge bounds the east of the site
3. Mature trees along the western boundary
4. Beech hedge and trees along part of northern boundary
5. Dirleton Castle stands on rock outcrop
6. No boundary to the south allows views to and from the A198.

Views to the castle from the A198

Appraisal

- + Topography favourable for buildings and roads
- Hedgerows bound parts of the eastern and northern boundaries
- Mature trees and farm buildings contain the western boundary
- Opportunity to improve boundary of the A198
- Development would change the setting of Dirleton Castle, affecting key views from the A198 as it skirts to the south of the village
- No existing natural boundary to define the southern edge of the site
- Site would be highly visible from the A198 unless significant boundary woodland were planted, which would take years to establish and would then reduce views to the castle.
- Visual and audible impact of the A198
- Site access from Station Road would remove the existing field hedge.
- Development would impact adversely upon the character of the Conservation Area
- Development would be parallel to the existing grain of the village, rather than engaging with it, thereby making it appear external to the village



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Muir Homes

Dirleton

Landscape & Visual Appraisal of Development Capacity

This report has been prepared by Ian White Associates Landscape Architects.

Author : Nick Bowen CMLI
Date: February 2016

Revision A : April 2016
Revision B : June 2016
Revision C : October 2016

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Introduction

The aim of this report is to appraise the suitability of three sites at Dirleton to accommodate new housing development. The landscape character, qualities and capacity to absorb new development of each site have then been appraised through desk and field study.

Location

Dirleton is a village in East Lothian, approximately 32 km east of Edinburgh off the A198 on the B1345. It lies between North Berwick (4km east) and Gullane (3.5km west). The coast of the Firth of Forth is approximately 2km to the north.

Dirleton is set on and around the rocky outcrops of Dirleton Castle and Chapelhill, within open generally gently sloping arable land, abutting the wooded estate landscape of Archerfield.

Regional Landscape Character

The Lothians Landscape Character Assessment published by SNH (1998; Ash Consulting Group) describes this locality as lying within the Coastal Margins - North Berwick Plain, which has the following characteristics:

Due to the subdued topography of the area the character of this coastal plain extends well inland. From the coast the plain is virtually flat, consisting of raised beach deposits, gradually giving way to gentle undulations towards the south. Within most of the area views across the sea are common, emphasising the open, level nature of the coastal plain. The only significant interruption of this to the plain is the dominant North Berwick Law (187m) - a site of great archaeological importance, which is echoed in the distinctive profiles of the Bass Rock and Craigeith in the Forth. There is a diverse range of scenery and habitats along the coast. The crags and rocky outcrops which form much of the coastal edge enclose numerous small sandy coves backed by dunes, which become beaches of a greater extent at Aberlady and Gullane. Golf courses, footpaths, car-parks, and caravan and picnic sites lie along the coast.

The hummocky terrain, short grasses and sandy soil of the East Lothian linksland represent ideal conditions for golf. Courses across the coastal plain form distinctive elements in the landscape, and their historic significance in the development of the game is recognised throughout the world.

The links and dune systems are also of nature conservation value and carry scattered scrub of gorse and sea buckthorn.

The land use across the area is dominantly arable with expanses of agricultural land sweeping smoothly across the plain. These fields are divided into a distinctive large-scale network of fields and are broken by bordering hedgerows or occasional stone walls and fences. The few burns which flow across the plain have been straightened and often incorporated into the field pattern.

The area is also particularly rich in major policy woodlands. The proximity to the coast has resulted in areas of distinctive wind-shorn and sculpted woodland. Small tree clumps, shelterbelts and a scattering of hedgerow trees throughout the farmland assist further in the provision of a degree of shelter.

Settlement is concentrated mainly along the coastal fringe, where a number of highly attractive and distinctive small towns and villages are strung out along the A198 including; Longniddry, Aberlady, Dirleton, Gullane and North Berwick. Further inland, a network of often near-straight minor roads links numerous cottages and large farmsteads. Many of the older buildings are constructed of red sandstone rubble and pantiled roofs.

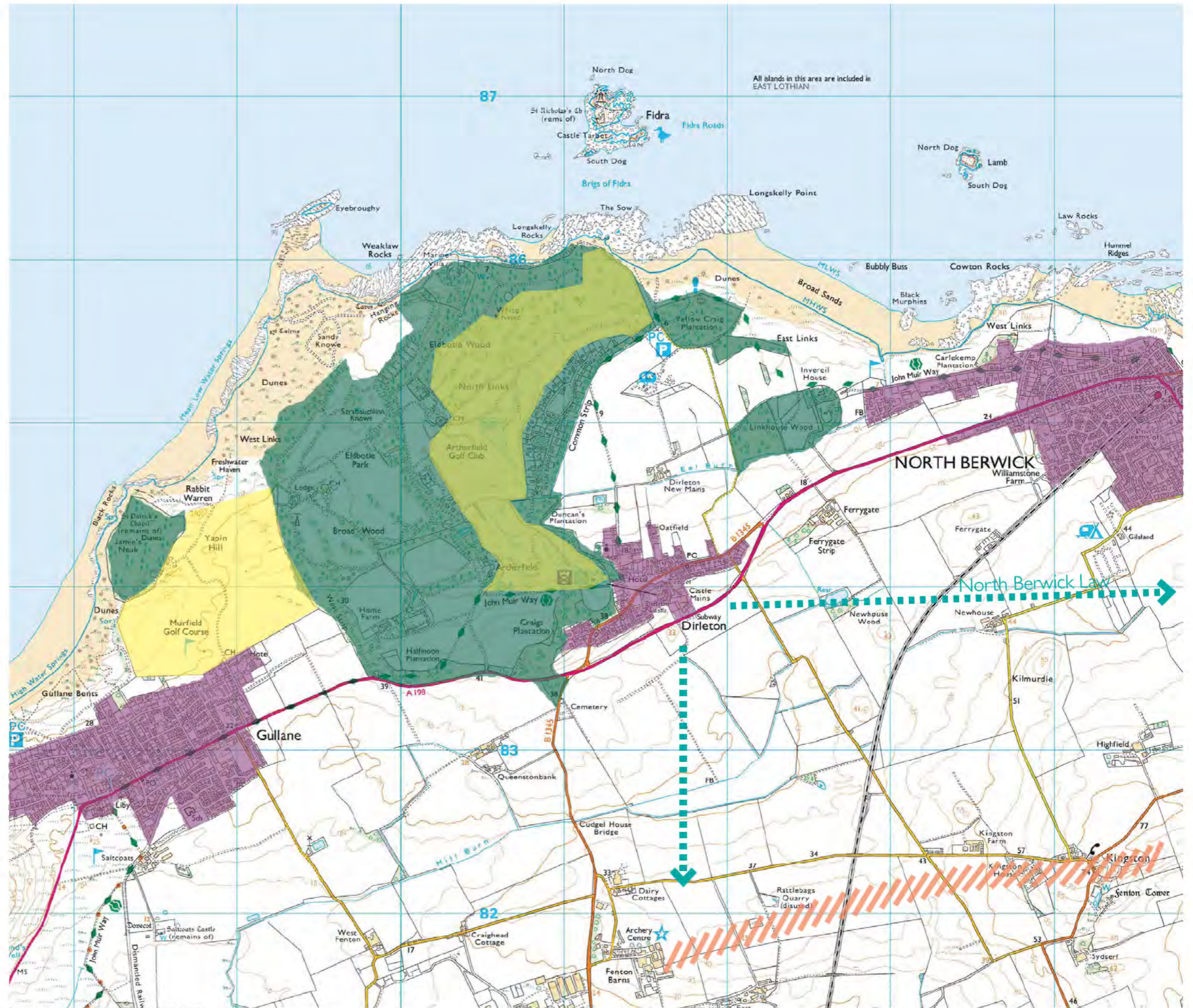
The fertile swathes of crops combine with extensive estate woodlands, locally distinctive villages, farmsteads and mansions, and a varied coastline to create a highly attractive landscape of great diversity.

The SNH report identifies the following pressures on the landscape in this character area:

- High visual sensitivity of immediate coastal zone;
- Potential visitor pressure from successful tourism and recreation industry;
- Pressure for residential expansion of coastal settlements.

It concludes with a number of guidelines for maintaining the integrity of this landscape character area:

- Require careful visual integration of new built developments
- Maintain and reinstate existing hedgerows and trees
- Seek to secure long-term management of key estate landscape features
- Promote integrated coastal zone management strategy including visitor management, tourism, recreation and other developments
- Encourage limited increase in farm woodlands to integrate recent expansion of buildings
- Preserve character of minor road network and its linkage to field pattern



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Local Landscape Character

The B1345/ Main Road forms the spine of Dirleton and was the main road between Gullane and North Berwick before the bypass A198 was built in 1975. The B1345 rejoins the A198 after passing through the village.

The south-western edge of Dirleton, where the B1345 leaves the A198, opens onto agricultural land to the south, affording extensive views which include North Berwick Law dominant over the relatively flat landscape. After rising to enter the village, the road descends the street past mature woodland lying on the north side, passing the school. The green character of the village is apparent, with lawns bordering the side of the road; cottages and houses along with the primary school are a mix of stone and harled buildings, the older buildings lining the street.

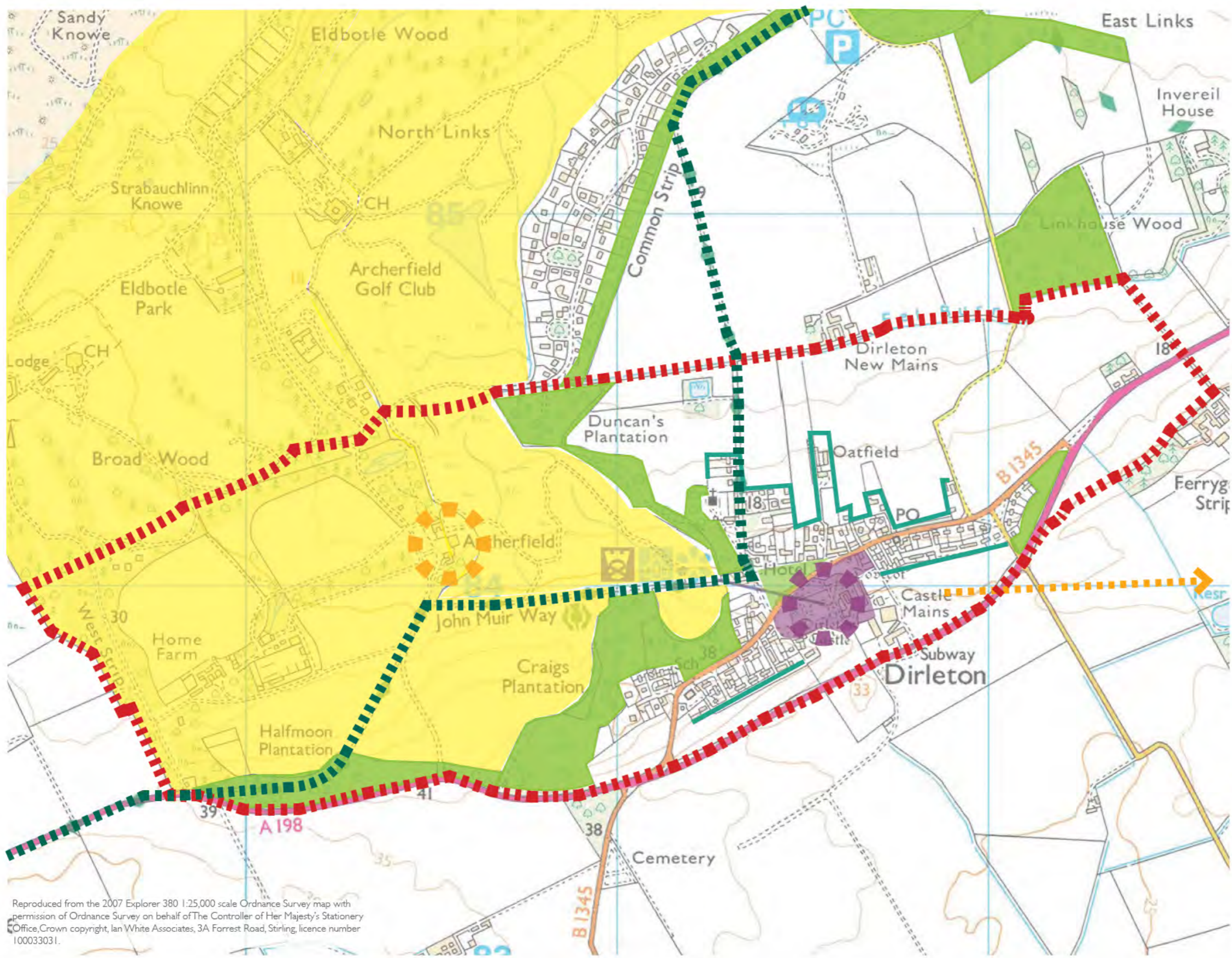
After passing Manse Road, a large triangular green is entered, bordered by houses and two inns on the north and west sides and by Dirleton Castle on the south. A line of mature trees define the north of the green whilst the impressive stone wall of the castle grounds mark the south of the green; beyond this wall many large trees form a strong backdrop to the green. The castle itself is largely hidden, with only the tops of the gables visible from here.

Within the village there is a rich composition of houses with gardens and open greens. Garden boundaries are varied and attractive. Stone walls rather than hedgerows are prominent features of the village. There is permeability of views through extensive mature trees and gardens that allow glimpses to the buildings beyond, whilst presenting a strong frontage onto the street and green. Most buildings are of small scale, although there are exceptions including the church, the castle, Oatfield House, Dirleton House and the Red House, built to house Estate workers. The two inns (The Open Arms and The Castle Inn) face onto the main green. Materials of buildings in the older part of the village are almost exclusively stone. Roofs tend to be either natural slate or clay pantile.

Passing eastwards beyond the green, Dirleton Road is lined on the south side by single storey 20th century housing of rather uniform character; white rendered walls with some stonework. Larger villas within generous gardens lie on the north side of the road. At Foreshot Terrace a belt of mature lime trees form an impressive feature defining the character of this part of the village.

The approach road to Dirleton from the east has a small woodland on the south side of the road and open agricultural fields on the north. Views northwards are relatively open across the fields, however continuous woodland in the distance prevent views to the coast.





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Local Landscape Character

- 
Dirleton Conservation Area
 Comprises the entire village and setting

- 
Dirleton Castle Scheduled Ancient Monument
 Category A listing includes the castle and associated dovecot, ancillary structures, gardens and boundary walls. The castle is built on a rocky outcrop, elevated above the core part of the village.

- 
Dirleton Castle Garden and Designed Landscape

- 
Green
 The central green surrounded by attractive old buildings and gardens forms a place of strong character and high landscape and visual value that define Dirleton.

- 
Woodlands
 The mature woodlands of the Archerfield estate cloak the western part of Dirleton, contributing to it's mature, green and sheltered character. A small plantation to the eastern edge is also an important landscape feature. Throughout the village, there are mature trees many of which are protected by a Tree Preservation Order.

- 
Archerfield Estate
 An Inventory Designed Landscape with strong woodland structure, into which golf links and luxury housing have been inserted.

- 
Archerfield House
 Category A listed building.

- 
John Muir Way
 A 215km long walking route, locally following pre-existing tracks and paths.

- 
View to North Berwick Law
 The Law is visible from the south of the village.

- 
Open countryside edges
 The southern edge of the village is regular, linear and out of character with the village core. The northern edge is varied, irregular and integrates with the farmland.



General view from Kingston, south-east of Dirleton

Kingston offers an extensive panoramic view across the coastal plain and the Firth of Forth, extending to the Ochil and Lomond Hills beyond. A large-scale field pattern of mainly arable land, weakly defined by hedgerows and stone walls with few trees. Woodland forms a setting for Dirleton with the bulk of the village sitting below the areas of woodland.

The houses on Gylers Road are very prominent considering their modest size; they appear elevated above the height of Dirleton castle. They form a crude edge of the settlement against the open countryside, appearing to lie beyond the extents of the historic village gathered around the castle.

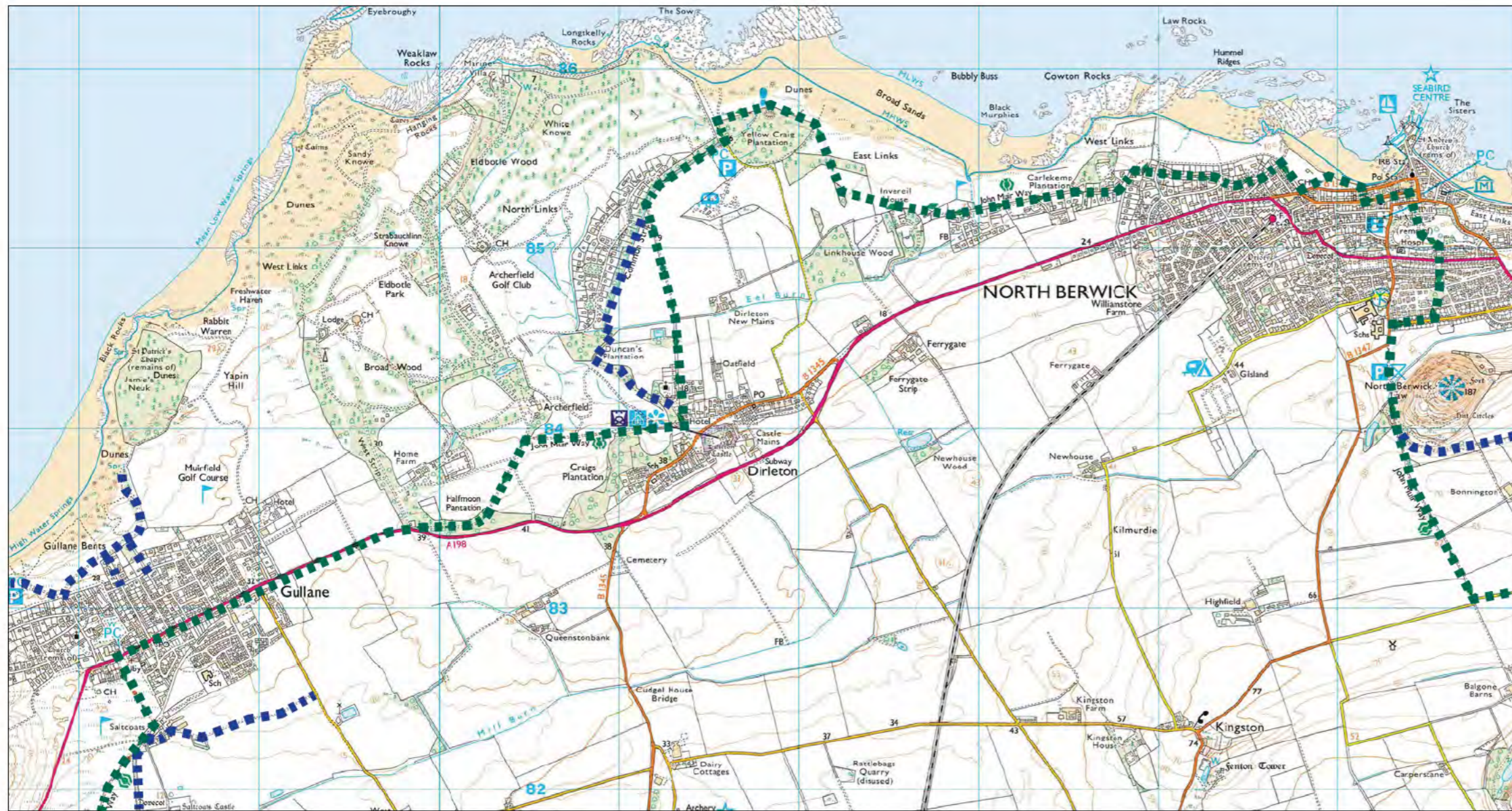
Scattered small scale wind turbines are present south of Dirleton; some larger turbines are visible in Fife.

The Castlemains Place site is visible but set down into the topography, at the lowest visible part of Dirleton. The modest scale of houses on Castlemains Place is apparent.

Core Paths

The local East Lothian core paths network is illustrated below. The green dashed line highlights the John Muir Way.

The John Muir Way stretches 215km between Dunbar and Helensburgh. The route is named after Dunbar-born John Muir, who emigrated to America and became a key figure in the conservation movement and father of the American National Parks.



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Core Path passes north of the village



View towards Dirleton from the John Muir Way

Potential Sites for Development

Three sites for which representations have been made to the Main Issues Report for 20-40 homes have been identified for consideration in this appraisal. All lie within the village of Dirleton and are of open land theoretically suitable for building upon.

1. Field north of Foreshot Terrace
2. Land to the south of Castlemains Place
3. Land to the south of Gylers Road



Field north of Foreshot Terrace

Description

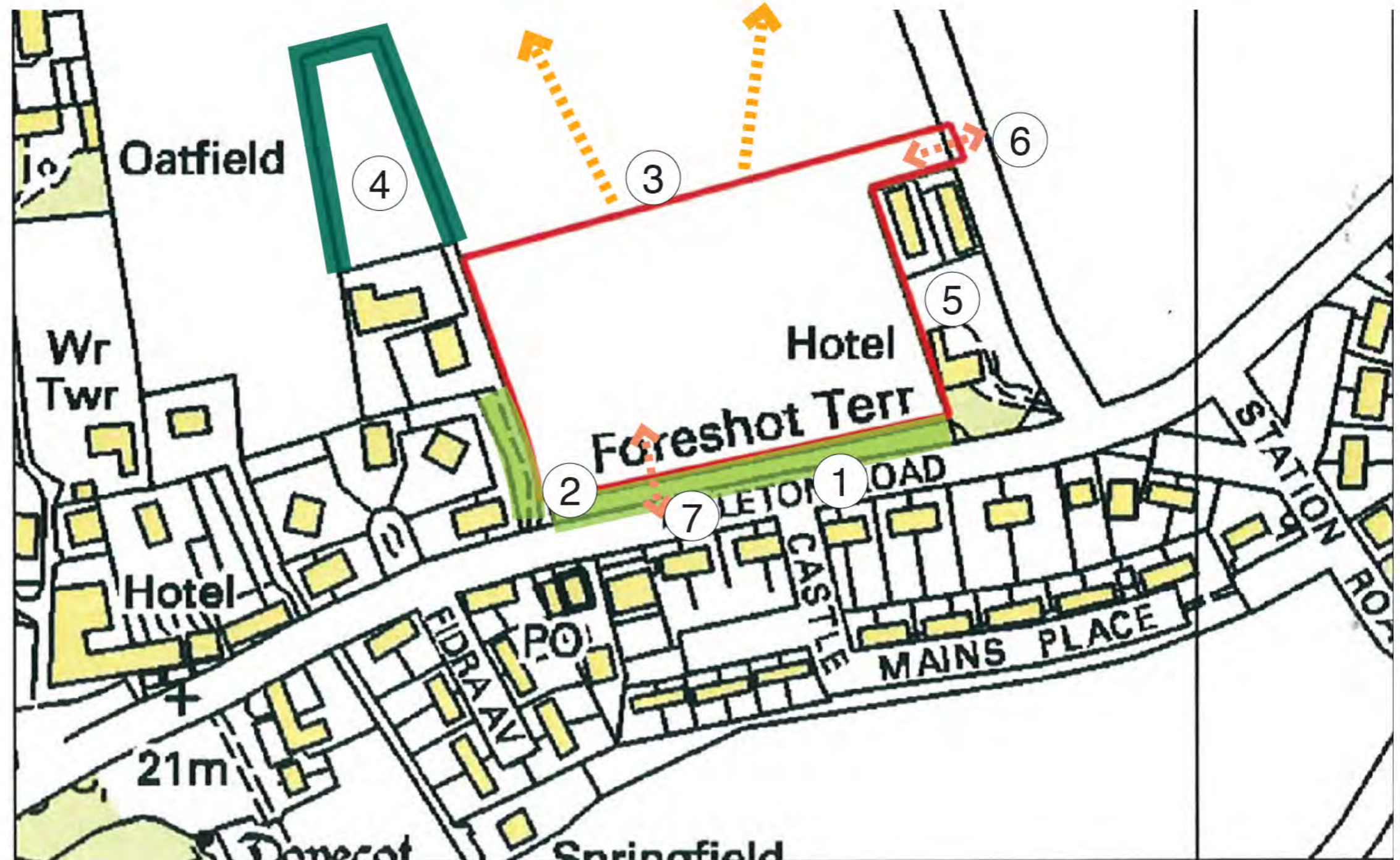
An agricultural, greenfield site, almost flat, with a gradual slope down towards the coast at the north of the site. 1.7 hectares.

Located on the principal route through the village, but lying behind a belt of mature trees and mixed young woodland that bounds the north of Foreshot Terrace. These mature trees give the southern boundary strong definition; predominantly lime with lesser trees of sycamore and ash. The trees are protected under a tree preservation order (TPO), and other mature trees on the western boundary of the field are protected through inclusion within the conservation area. To the north of the site the boundary is currently undefined offering open views to the wider landscape.

1. Dirleton Road/ Foreshot Terrace
2. Row of mature trees protected by a Tree Preservation Order
3. Open views to the north (Coast hidden behind woodland)
4. Speedwell Gardens surrounded by existing Cyprus hedging
5. Cedar Grove C listed building to the east of the site
6. Potential vehicular access off Ware road
7. Potential pedestrian / cycle access at gap in existing mature lime trees.

Appraisal

- +
 - Well located off the principal street of Dirleton (Dirleton Road / Foreshot Terrace)
 - Relatively low lying, flat land, favourable for buildings and roads
 - Development would be set behind the existing mature trees, and thus of limited visibility from the main street. The site lies lower than the street, which would reduce the relative scale of any development
 - Strongly contained along east, south and west boundaries, by existing mature trees, houses and boundary walls/hedges
 - Visibility from open countryside to the north is limited by flanking buildings, boundaries and mature trees
 - Limited impact on conservation area
 - Benefit of mature trees to setting (subject to protection zone)
- - Some visibility from the north (including from the John Muir Way) although this is amongst existing building groupings and pattern of mature vegetation
 - Mature trees on southern boundary prevent road access directly off Dirleton Road
 - Existing trees require a stand-off for root protection and to limit shading of any proposed houses



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Site 1



John Muir Way

Situated on the flat arable land north of Dirleton, the John Muir Way here leads inland from the coastal links, passing through Dirleton and then Archerfield. The visible northern edge of the village is a discontinuous, varied mix of houses, walls, hedgerows, woodland belts and lanes. Dirleton Castle is visible on the skyline, tipping above the mass of mature trees in the heart of the village. The overgrown cypress hedge surrounding Speedwell Gardens is apparent, partially obscuring the Foreshot Terrace site from view.



Lane off Dirleton Road

Looking into the Foreshot Road site. Behind the belt of mature trees at the roadside, this site lies flat and open to the north. The coast lies hidden beyond the woodland belts of Archerfield, which lends the fields north of Dirleton a somewhat isolated character. The logical extent of any development on this site would be drawn between the existing buildings to east and west of it.



Ware Road at the Eel Burn

The farmland north of Dirleton has an austere character, with degraded wall boundaries and weak pattern; there is little structure or habitat. The Foreshot Terrace site is visible with a backdrop of the mature lime trees; the top chimneys of the castle just project above the lime trees. The varied nature of the northern edge of Dirleton is apparent, consisting of pockets of woodland, houses of different aspect, garden walls and tongues of farmland.



Corner of Main Road and Ware Road

This view looking towards the village core highlights the importance of the line of mature lime trees to the streetscape, providing stature that contrasts with the modest and uniform housing of Foreshot Terrace. The low stone wall contributes character, continuing around the C-listed Cedar Grove on the corner. Archerfield woodlands prevent views to the Firth of Forth, but distant hills in Fife are seen above the trees. The Foreshot Terrace site is glimpsed between trees in the garden of Cedar Grove.

Land to the south of Castlemains Place


Description

An open, agricultural, greenfield site of 2.3 hectares in area, dipping northwards from the A198. The site is highly visible from the A198 as there is no existing natural boundary to the road. The northern edge has a beech hedge with regularly spaced trees, and the properties along Castlemains Place behind. Mature hedging runs along the boundary of Station Road. To the west of the site are a significant number of mature trees alongside the lane and in the grounds of Castlemains farm.

The site currently offers open views southwards across the agricultural landscape and south-eastwards towards Berwick Law.

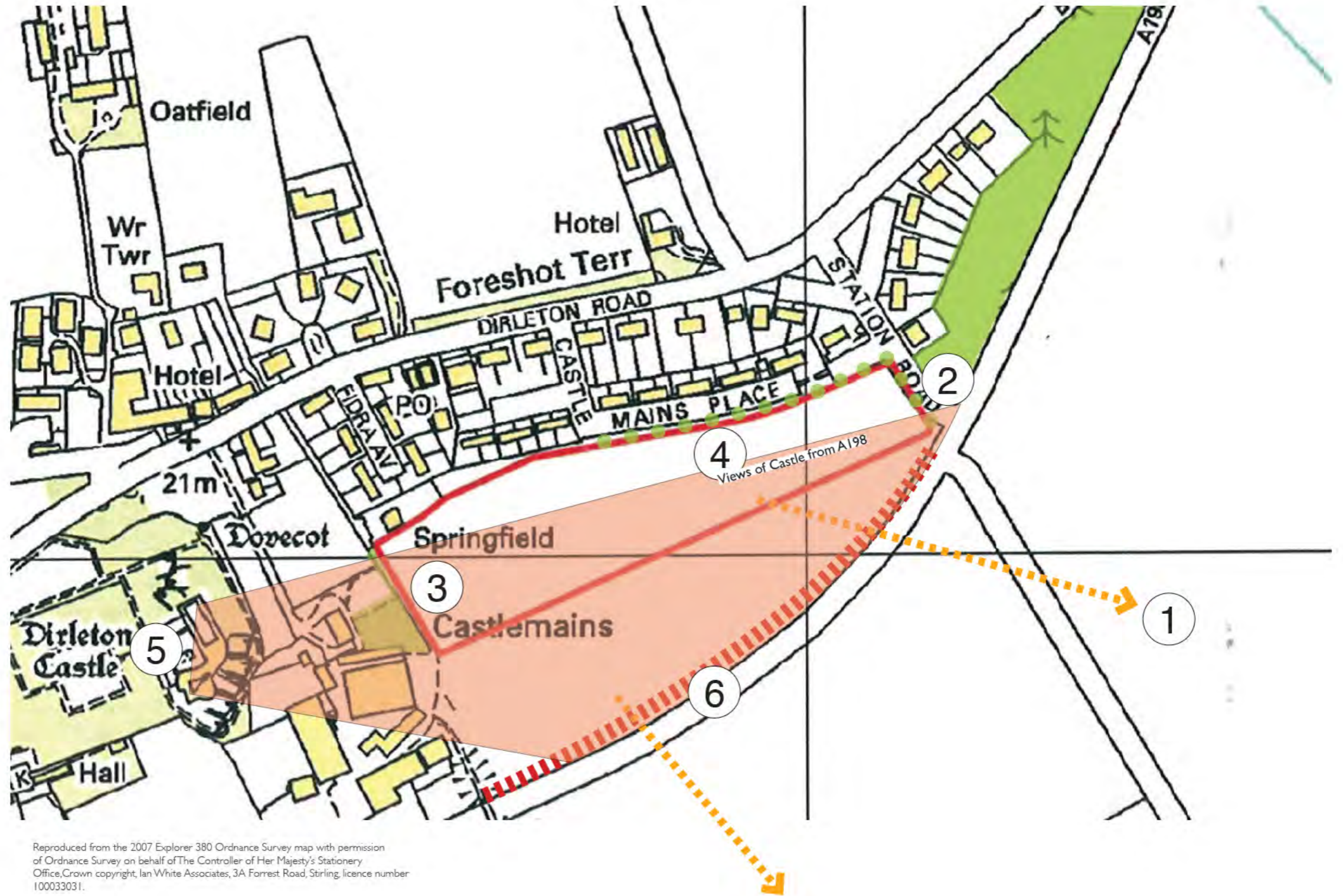
Dirleton Castle lies to the west, beyond Castlemains Farm; it sits on an elevated rocky outcrop and is thus visible from almost the whole of this site and from the adjacent A198.

1. Distant views from the east to Berwick Law.
2. Station Road hedge bounds the east of the site
3. Mature trees along the western boundary
4. Beech hedge and trees along part of northern boundary
5. Dirleton Castle stands on rock outcrop
6. No boundary to the south allows views to and from the A198.

 Views to the castle from the A198

Appraisal

- +
 - Topography favourable for buildings and roads
 - Hedgerows bound parts of the eastern and northern boundaries
 - Mature trees and farm buildings contain the western boundary
 - Opportunity to improve boundary of the A198
- - Development would change the setting of Dirleton Castle, affecting key views from the A198 as it skirts to the south of the village
 - No existing natural boundary to define the southern edge of the site
 - Site would be highly visible from the A198 unless significant boundary woodland were planted, which would take years to establish and would then reduce views to the castle.
 - Visual and audible impact of the A198.
 - Site access from Station Road would remove the existing field hedge.
 - Development would impact adversely upon the character of the Conservation Area
 - Development would be parallel to the existing grain of the village, rather than engaging with it, thereby making it appear external to the village



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Corner of A198 and Station Road

Looking west across the Castlemains Place site, the castle is prominent rising above the village amongst mature trees. The A198 curves to the south of the village without screening or boundary features. Castlemains Place appears low in the landscape, the site sloping gently upwards towards the A198. A beech hedge with spaced trees provides a boundary; the low height of the houses and their pantile roofs helping them to recede and fit with the older buildings of the village, although the repeating design is clearly modern.



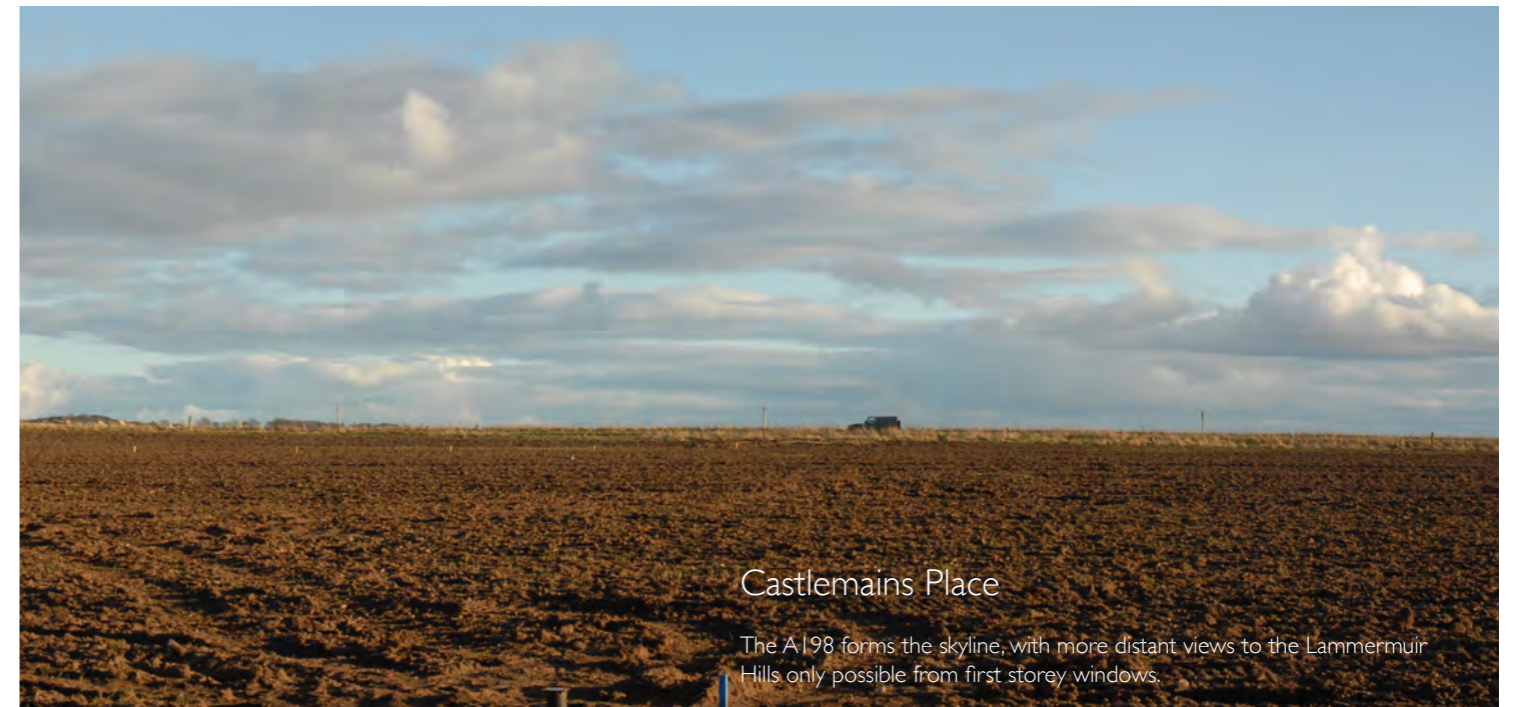
Corner of Castlemains Farm and A198

The open relationship of this site with the A198 is apparent. Development of this site would require a significant set-off from the A198 to achieve screening of the road and to establish a robust boundary to the settlement. This set-back would also be required if views to Dirlerton Castle from the A198 were to be retained without disruption.



Castlemains Place

An effective boundary is formed by the hedge and pairs of specimen trees. Development on the site here would impact upon views from existing houses across open farmland, albeit already cut by the A198.



Castlemains Place

The A198 forms the skyline, with more distant views to the Lammermuir Hills only possible from first storey windows.

Land to the south of Gylera Road

Description


An open, agricultural, field, on the southern edge of Dirleton adjacent to the A198. 1.95 hectares.

The site slopes southwards to meet the A198, from which it is highly visible. The existing houses of Gylera Road, with a scattering of mature trees along the road, mark the northern boundary. The east and west boundaries are defined by stone walls.

The site offers open views across the agricultural landscape and towards Berwick Law; the Bass Rock is visible in the distance from the east of the site. A community orchard has been established in the north western part, behind a newly planted hawthorn hedge.

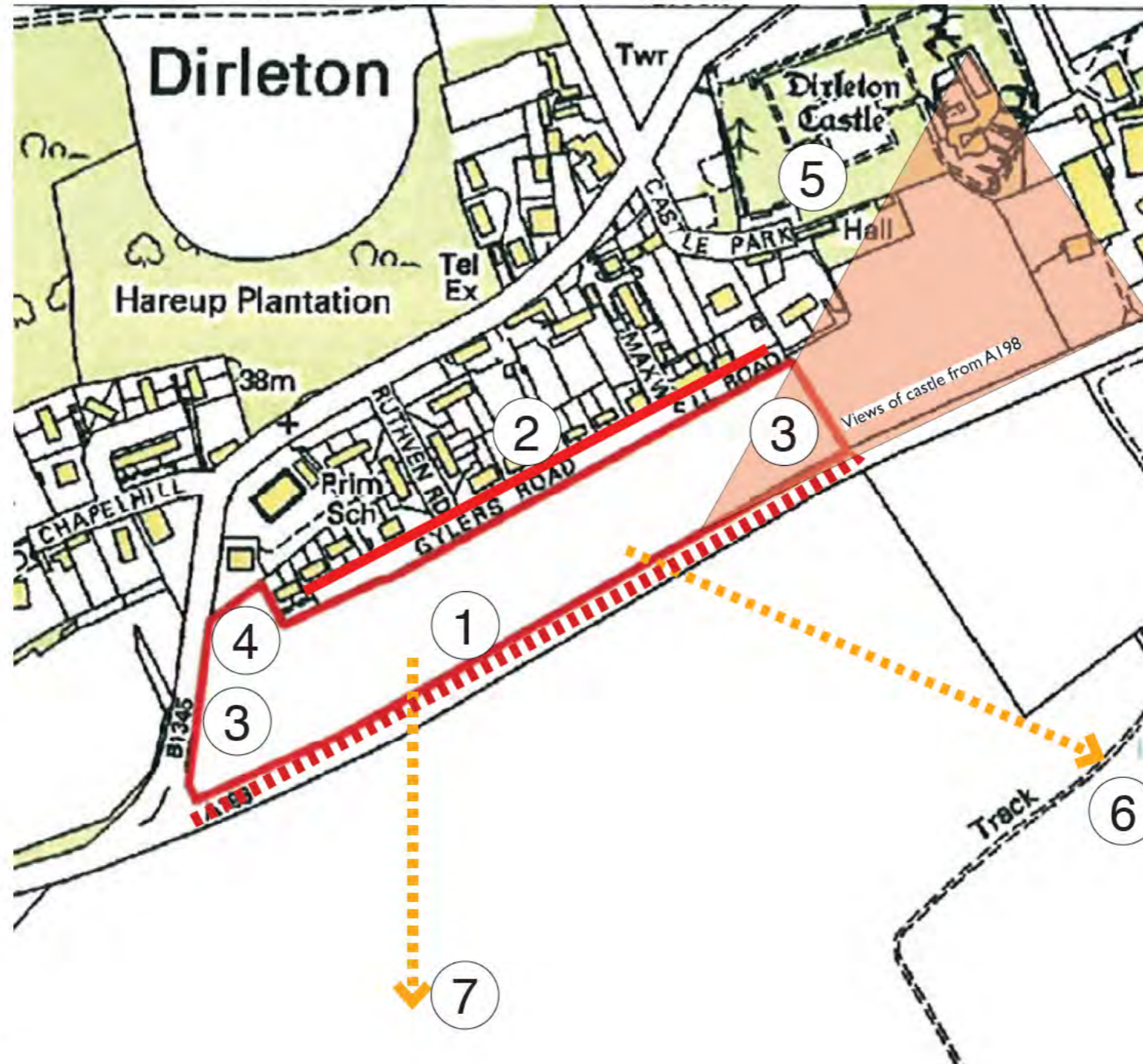
The castle lies north east of the site on an elevated rocky outcrop and it is likely that development on this site would be visible from parts of the castle. Expansion of housing on this site would have a disproportionate landscape and visual impact on the setting of Dirleton, due to the raised and prominent position visible from a wide stretch of countryside to the south.

1. No existing natural boundary to the south of the site allowing views to and from the A198.
2. Existing housing highly prominent.
3. Existing stone walls define the east and west of the site
4. Community orchard behind a newly planted hawthorn hedge
5. Dirleton Castle scheduled monument, listed buildings and garden and designed landscape.
6. Distant views from the east to Berwick Law
7. Views to Lammermuir hills across the East Lothian plain.

 Views to the castle from the A198

Appraisal

- +
 - A more robust boundary to the village could be formed against the A198 were substantial planting to be undertaken.
- - Development would change the setting of Dirleton Castle and would adversely affect the character of the Conservation Area.
 - Disproportionate visual prominence due to topography.
 - Achieving a robust boundary to the A198 on such a sloping site would be unlikely
 - Development would link Dirleton directly to the A198



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Entrance to the community orchard

Site 3



Fenton Barns (BI 345)

Located in the slight valley of the Mill Burn south of Dirleton, this viewpoint emphasises the prominence of Gylers Road houses relative to the castle, and reveals how well the main body of the village is nestled into the topography.



Gylers Road

The elevated position of Gylers Road affords extensive panoramic views to the south. Berwick Law dominates the relatively flat topography of large fields; the Lammermuir Hills are visible in the distance. Post and wire fences offer no boundary definition or screening of the A198; a row of widely spaced lime trees will in time develop into a boundary feature. The castle is not visible from this viewpoint, but comes into view towards the east end of the site.



Junction of Main Road and A198

As the A198 runs past Dirlerton the houses on Gylers Road stand prominent on the slope crest. The Gylers Road site is entirely open to view and provides no landscape boundary to either Gylers Road or to the A198. The castle is not visible. Development on this site would require a significant planted buffer to the A189; even with such planting, the terrain would leave new housing as exposed to view as the existing ones.

Conclusions

Ranking

The appraisal of each of the 3 potential sites has defined the landscape and visual character, constraints and capacity to accommodate development of each site.

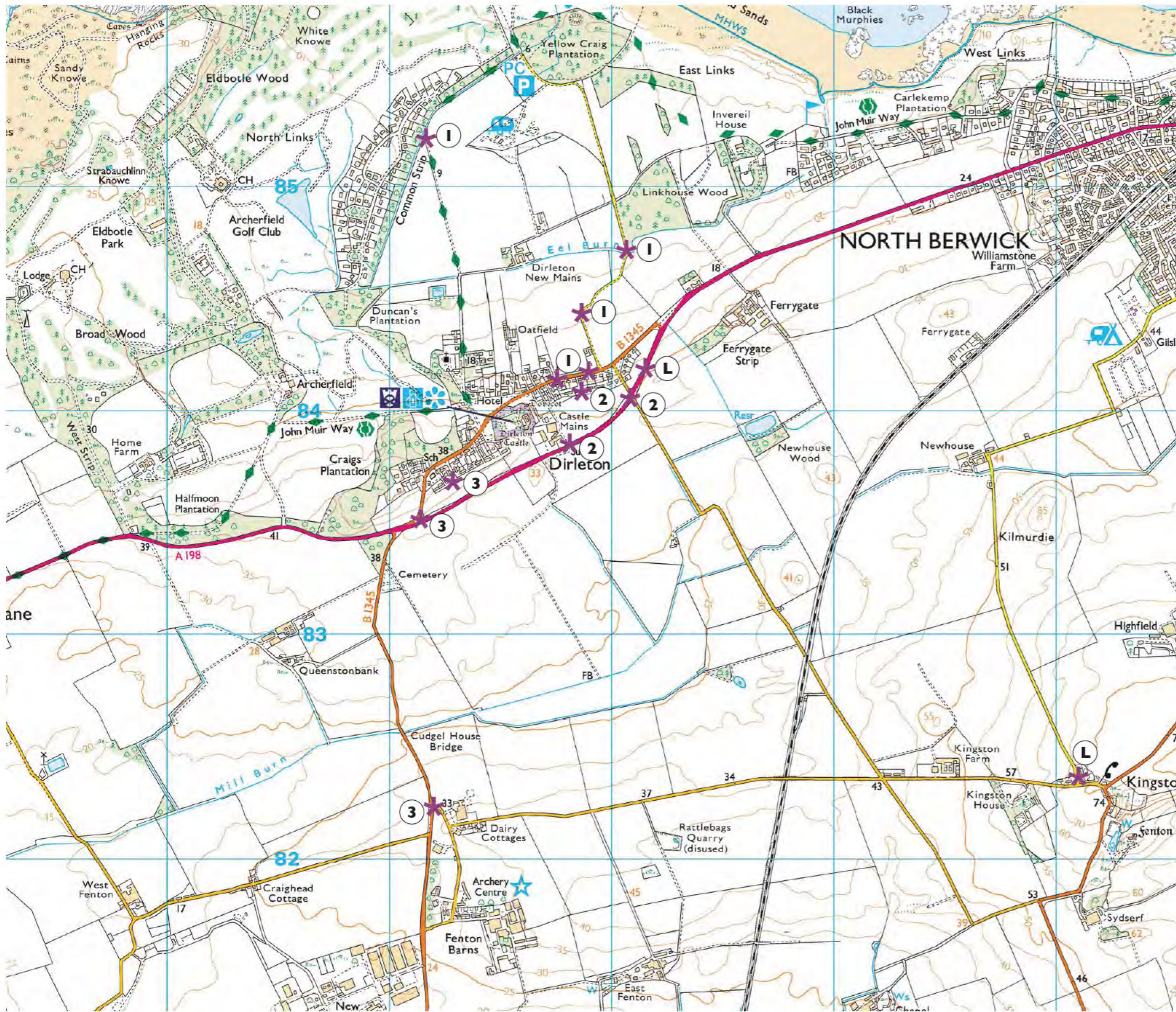
In order to attempt a comparative assessment, and arrive at a ranking of sites, a scoring system has been applied using the following criteria :

- Could a robust boundary to development, appropriate to the landscape character and effectively controlling visual impact to a satisfactory level, be created?
- Would development adversely affect the setting of the existing settlement?
- Would development be in character with the settlement pattern?
- Are there significant constraints to development or to creation of an appropriate landscape structure?
- Would development adversely affect significant natural features in the landscape, including their setting?
- Would there be an impact on historic/ cultural character of the castle and conservation area?

Each aspect has been scored on a ranking of 1 to 3 :

1. This positive criteria can be achieved readily / this negative criteria is readily avoidable
2. This positive criteria can be achieved only with sensitive design / this negative criteria is avoidable only with sensitive design
3. This positive criteria cannot be satisfactorily achieved / this negative criteria is unavoidable and significant

Site	Is a robust boundary possible?	Would development adversely affect the village setting?	Would development be in character with the settlement pattern?	Are there significant constraints?	Would development adversely affect natural features?	Would development adversely impact upon the historic character of the castle and Conservation Area?	Comments	Rank Score
1 Foreshot Terrace	1	1	1	2	1	1	This site has relatively low elevation. The existing boundaries provide a perimeter on three edges, greatly limiting overlooking; retention of the lime trees on Dirleton Road is vital and will require a minimum 12.0m set-back of buildings from the southern boundary. There is potential to form pedestrian routes into the site from Foreshot Terrace between the mature lime trees; this would help townscape integration. The preferred development pattern would be of north-south lanes from the access point on Wares Road, so that the irregular character of the northern edge of the village (no consistent built frontage, varying building aspects, greenspace and trees) is continued. This dispersed pattern of buildings would provide permeability. The use of traditional wall and hedge boundaries, rather than timber fencing, would best match the local character of garden boundaries.	7
2 Castlemains Place	2	2	2	2	1	2	This site has relatively low elevation and is overlooked from the A198 and rising land to south of the village. It would require a robust southern boundary set-back from the A198, to address noise and visual impacts of the road and to form an effective settlement boundary. This requirement appears to conflict with the desire to maintain views to the castle from the A198. Development would adversely impact upon the the setting of Dirleton Castle and the village Conservation area, appearing to surround it more in modern housing that separates it from the surrounding countryside. The sequence of views to the castle and mature trees surrounding it would be impeded. Residential garden boundaries would be exposed to the southern edge; traditional walls and hedges would be vital, rather than timber board fencing. Greater permeability to the village edge would be achieved with a north-south alignment of streets. Development should not extend southwards as far as the Station Road/ A198 corner because of its prominence in roadside views.	11
3 Gyler's Road	3	3	3	3	2	2	Would be highly visible from the south as site sits higher than the rest of village. Development would compromise the agricultural setting of Dirleton and a robust boundary to the development would be difficult to create. The visibility of existing houses on Gyler's Road indicates how prominent new development would be here, and how poorly fitted to the setting of Dirleton.	16



Appendix : Photo Locations

Numbers refer to site numbers, at which sections of the report the photos are included.

L = see Local Landscape Character section

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IAN
WHITE
ASSOCIATES
LANDSCAPE
ARCHITECTS

From:
To: [Local Development Plan; Zochowski, Paul](#)
Subject: Comments on the proposed Local Development Plan
Date: 02 November 2016 13:55:09

Policy and Projects
Planning and the Environment
East Lothian Council

Comments on Technical Note 8
Planning for Countryside around Towns
Section 6 The Proposed Local Development Plan Approach: Countryside around Towns and Green Belt

Proposal for a Suburban Fringe Woodland Structure

The housing supply section of the LDP places a considerable amount of new housing on the edges of the existing settlements, exposed to view from the surrounding countryside. Generally, the East Lothian countryside is an open, agricultural landscape, with relatively few blocks of farm woodland. The native woodlands have been almost entirely cleared, except for one or two fragments in the steep sided cleuchs of the east coast. Due to this general lack of tree cover, new housing developments on the edges of settlements will be visible for considerable distances from the surrounding countryside and from the roads, railways and paths which run through it.

The need to avoid suburbanisation of the county's countryside is recognised in the aims and visions section of the LDP but there is no specific evaluation of the aggregate effect of the visual impact of the proposed housing supply on the countryside, and no strategic policy to deal with it other than the Countryside around Towns policy. This policy seeks to protect specific areas of sensitive countryside from further building, but does not address the issue of the impact of the proposed housing site edges on the adjacent, often protected, rural areas. What is needed is a further policy within the Countryside around Towns section of the LDP to bring about a new suburban fringe woodland structure associated with the new housing developments. These proposed woodland areas should also be indicated on the housing site development briefs.

It has been argued that this is/can be done on an ad hoc or site by site basis. However, this is not happening. Historically, the Chesters housing development, for example, built on the fringe of the conservation village of Drem, has no boundary woodland or tree planting. Consequently, it sits at the top of rising ground, in full view from a large area of countryside to the north and from the road from North Berwick. It is a clear example of how not to suburbanise the countryside. In the new proposed LDP there are very few proposed woodland belts in the housing site development briefs.

What is needed is a 'fringe woodland' policy applicable to all suburban edge housing developments across the whole county. This would require the planting of fringe woodlands around every new suburban edge, unless the developer can demonstrate that edge screening already exists.

Such a policy would have other benefits:

1 The biodiversity elements in the proposed LDP focus almost entirely on the conservation and protection of the remnants of wildlife habitats which remain. There is no policy to link new habitat creation with development. The almost total

loss of habitat for wildlife resulting from agricultural practices and house building is recognised, but there is no policy in the LDP which aims to redress this problem. If native woodland were used in association with new fringe housing, and if the woodland belts were 30 metres wide to provide winter shelter, then they would also make a significant contribution to biodiversity and wildlife habitat recovery.

2 If there were a strategic policy in place requiring all fringe housing developments over a certain size (10 houses?) to provide woodland screening, then developers would know in advance that they would require land for this purpose, and could act accordingly.

3 The building of houses for commuters to Edinburgh, particularly in the eastern end of the county, is in direct contradiction with central and local government policies which seek to reduce carbon emissions in order to slow down global warming. Many millions of cubic metres of carbon gas emissions will occur per annum as a result of the travelling associated with the 10,000 houses being built in the county to serve Edinburgh over-spill. The planting of a woodland structure in association with the new house building zones would help to offset this pollution through increased carbon capture.

4 The woodlands could be community owned, either using a housing estate factoring arrangement or a community woodland trust, and could also therefore be used for recreation.

Derek Carter

DRYDEN FIELD, EAST SALTOUN

REFERENCE 16/00014/LDP

DATE 25-10-2016



Dear Sir/Madam.

We are writing this letter to object to the proposed plans for Drydenfield, East Saltoun.

we feel that the proposed plans of a village green, play park and a public foot path.

would be very intrusive.

could have a unsettling affect on some horses, which could put my workers in danger of being hurt. As there is no drains on the east side of our property we get a lot of water flooding our garden from Drydenfield which we think would be made worse with the proposed plans.

The road junction where the proposed playpark would be is a very busy junction with Tractors, Saw Mill lorries and Quarry lorries all day would be a very dangerous place to cross to get to a public path and a playpark. With around 75 houses being built with an average of 2 cars per house that could be an extra 150 cars on that junction.

We don't have a lot of winter light and if the proposed planning went ahead we would have less light.

Yours Faithfully

ALISTAIR DUFF

JUNE DUFF

From: .
To: [Local Development Plan](#)
Subject: Local Housing development plan for East Lothian (Saltcoats, Fentoun Gait East and South).
Date: 02 November 2016 21:12:03

Dear Sir,

I am very sorry indeed to know of the proposed EXCESSIVE planning applications for Gullane and the Surrounding area. I believe it is poor planning and I hope very much consideration will be given to whether or not these are the right places for development..

I understand that the Scottish Government aim was firstly to develop available Brown Field sites. Had this changed? Development as a priority should be given to developing the Old Fire Station in Gullane for Affordable Housing. That is where the Shortage is. Only on Friday was there a discussion on the Radio about the necessity for this, not more Executive Housing which clearly comes into some of the above applications. The Brown field area near the Junction of the A1 and the A196 should be another priority where access to useful amenities and infra structure are already in place, not in areas where these facilities are not available.

The roads in the Gullane area simply cannot cope with this influx. The roads are narrow, will quickly become rat runs, become more dangerous and we will lose the beautiful nature of the area, where it is a relaxing place for those that already live here and those that visit are able to enjoy. Only this weekend we passed children riding their bikes in the lanes. They had the freedom to do so. Youngsters on Horseback- the freedom also to do that. We notice how difficult it is to park, if you live near the Shops you can walk, but those who don't will need Transport. Where do they Park?

The infra structure is simply not available to cope with these proposals. The area is already experiencing huge issues as a result of the large estates being built in North Berwick.

Trains from To and from Edinburgh are full by the time they get to Longniddry. Parking is not available if you go later than the 7.20 am Train from Drem (you can't walk to Drem easily) , and parking at Longniddry , this week included a lot of parking on the double Yellow Lines at the Station and on the main Roads north and West of the Station. Buses whilst good, mean you need to be prepared to spend at least an hour either way to get into Edinburgh and that is from Gullane.

If these proposals happen, more space will be required to improve the necessary infrastructure for the School, Health and Welfare Services. They are inadequate. They only just cope now.

I urge those that are able, to reconsider these proposals .

Yours sincerely

Gill Morrison (Mrs)

From: [ALASDAIR HUTCHISON](#)
To: [Local Development Plan](#)
Subject: Fw: OBJECTION to proposed housing development in Gullane.
Date: 02 November 2016 21:44:45

To whom it may concern,

I have concerns regarding the proposed developments at Saltcoats (NK7), Fenton Gait South (NK9) and Fenton Gait East and I would like these to be removed from the proposed LPD as sites for housing development.

I understand the importance of increasing the shortage of housing stock in Scotland, but this must be kept to a limit which is reasonable and does not change the dynamics of a much loved historic town.

I work in _____ industry and feel that these sites would over stretch Gullane's local amenities and facilities including the local health centre and transport, and would increase traffic to an unmanageable degree. The village's roadways and parking are already stretched.

I have _____ and find the road running through Gullane is busy as it currently is. This would become significantly more dangerous should the traffic increase, and risk the safety of local children.

I hope that the voices and concerns of the local people are being heard.

Kind regards,

Mr Alasdair Hutchison

From: [Mary Chase](#)
To: [Local Development Plan](#)
Subject: Local Development Plan Objection
Date: 02 November 2016 21:57:57

OBJECTION to inclusion of Saltcoates (NK7), Fenton Gait East (NK8) and Fenton Gait South (NK9) in the LDP.

To whom it may concern at Policy and Projects Development, John Muir House, Haddington EH41 3HA

As a resident for over years I would like to object in the strongest terms to overdevelopment in the area with the likely inclusion of Saltcoates (NK7), Fenton Gait East (NK8) and Fenton Gait South (NK9) in the LDP.

- Urban creep of vast areas around villages destroy their character and are outwith previous village boundaries.
- The coastal villages need to be protected as previous generations did, and not turned into dormitories for Edinburgh.
- There would be so many more commuters on the small county roads, all in a hurry.
- Station carparks are already inadequate, Drem now has even less space with the new "Residents Only" signage so where will all the commuters park? There is no cycle track to Drem.
- Green field sites should not continually be stolen from the agricultural sector. Brownfield improvement is ok.
- A huge strain will be put on services: many more cars on roads, the primary school, doctors and so on. It is highly unlikely that these services can all be expanded to suck up this huge increase in demand when they are already struggling.
- Tourism in the whole area will suffer with disruption from years of development: trucks, noise, dirt and delays.

I trust that our councillors will take local objections into account and exclude Saltcoates, Fenton Gait East and Fenton Gait South from the LDP.

Yours Sincerely,

Mary Chase

Policy and Projects
 East Lothian Council
 John Muir House
 Court Street

Haddington
 EH41 3HA

2nd November 2016

**Response to Draft LDP Consultation
 Re: Development in Dirleton**

I have reviewed the LDP Main Issues Report, Interim Environmental Report Appendix 9 Site Assessments for both the Castlemains Place site HSG048 and the Ware Road site HSG018 which were put forward as the preferred and alternative development sites in Dirleton. Applying a simplistic scoring scheme to the Council's traffic light system of +1 for green, 0 for amber and -1 for red (see table below) it can be seen that both sites score equally.

Site	Castlemains	Ware Road
Suitability and Deliverability	1/6/2 = -1	1/5/3 = -2
Potential Impacts of Development	3/5/2 = +1	3/6/1 = +2
Total Score	0	0

I can therefore find no reason why the Castlemains site has now been put forward in the draft LDP as the proposed development site NK11 for the village.

A brief review of the site assessments also raises questions regarding the traffic light rating system e.g. For the Castlemains site Historic Scotland's view that development "could change the character of the conservation area" and they have "strong concerns about the impact on the proposed development on the setting of Dirleton Castle." is considered as an amber impact and is considered less important than the fact the Ware Road site is north facing. Clearly the system doesn't reflect the importance of the conservation status of the village.

With regard to the proposed Countryside Around Town policy within draft LDP I suggest that the proposed Castlemains site could be swapped for the Ware Road site. This would provide further protection to the setting of Dirleton Castle and remove what would be a significant constraint to a more natural infill development.

Yours Sincerely

Kate Hamer

From: [Carol Yarrow](#)
To: [Local Development Plan](#)
Subject: Objection to Housing Development in Gullane
Date: 03 November 2016 02:00:02

I feel strongly that there are too many sites for housing development being put forward for the Gullane area and would request that Saltcoats (NK7) and Fenton Gait East (NK8) and Fenton Gait South (NL9) be removed from the proposed LDP sites for housing development.

The main reason I feel is that doing all four housing sites would put too much pressure on our local amenities, such as the doctors, the schools as no doubt this would bring a lot more children to the village.

I also think the large amount of extra traffic, would put pressure on village parking and the local roads and so would have a very big impact on the village. Gullane which brings a lot of tourists to the area with its beaches and bird Conservation Area could not cope with all the extra traffic and parking needed. As the site suggested is so far away from the local shops that all the new residents would need to drive and park, which the High Street couldn't accommodate.

The Village Hall which is used by so many locals could not cope with the increased level of demand either.

Please do not ruin our local community with this overdevelopment.

Yours sincerely
Carol Yarrow,

From:
To: [Local Development Plan](#)
Subject: East Lothian Local Development Plan
Date: 03 November 2016 08:15:17
Attachments: [East Lothian Local Development Plan.docx](#)

Good morning

Please find attached document on behalf of The Honourable Company of Edinburgh Golfers in connection with the proposed Local Development Plan.

I would be grateful if you could confirm receipt.

Kind regards

Secretary
The Honourable Company of Edinburgh Golfers

East Lothian Local Development Plan

The Honourable Company of Edinburgh Golfers (Muirfield) has reviewed the proposed Local Development Plan for East Lothian and would like to comment on two matters concerning the proposals for the Gullane area.

1 The proposal to allocate land for housing at the Fire Training School site (NK6-100 houses), Saltcoats (NK7-130 houses), Fenton Gait East (NK8-50 houses), and Fenton Gait South (NK9-15 houses) will have a significant impact on traffic and services at the east end of Gullane. In particular the unclassified road from Gullane to West Fenton will become a major access route with a resultant increase in traffic accessing the A198. This is close to the entrance to Duncur Road which is the access road to Muirfield and we would welcome an assurance that the traffic management issues will be fully considered before any development is approved.

Our main concern, however, relates to the possible impact of these developments on the ability of Muirfield to host the Open Championship and other major golfing events, should we be asked to do so in future. Before, and particularly during, the Open Championship, there is a very substantial traffic flow around the course. Muirfield has the great advantage of being one of the best venues on the Open rota for ease of access for construction and contractors traffic (there were some 1500 heavy vehicle movements on to the Muirfield site at the time of the 2013 Open). We also welcome up to 50,000 visitors per day during the week of the Open who travel by bus, rail and bus, or private car.

The value of the Open to the Scottish economy has been calculated at some £70 million, most of which obviously benefits East Lothian, and we would not wish any development to make Muirfield a less satisfactory venue for the Open.

The Open also leads to a very substantial spike in demands for local services including particularly water, drainage, sewage, and electricity. Again we would welcome an assurance that this would be taken into account in any development proposals.

2 We note with satisfaction that there is no proposal to allocate land for housing on the north side of the A198 to the east of Duncur Road. While the principal reason for this is the adverse impact this would have on the historic Greywalls landscape, we would also point out that the ability to use this land for temporary tented village accommodation, construction compounds, parking etc. before and during the Open championship is of critical importance. Our view of this is strongly supported by the R&A who are, of course, responsible for the management of the Open.

The HCEG Committee considers that these matters must be taken into account before any development proposals are approved. We would be happy to enlarge on any of these issues should you wish.

From: [William Crawford](#)
To: [Local Development Plan](#)
Subject: Objection to Proposed Development Plan Greendykes Macmerry
Date: 03 November 2016 09:09:25
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Hi

Ref:

http://www.eastlothian.gov.uk/info/204/local_development_plan/1777/proposed_local_development_plan

I am writing concerned about the proposed development plan at Adniston Farm, Macmerry to GreenDykes Road Macmerry.

The Macmerry and Gladsmuir community council has written to all residents outlining the proposed development, and whilst I appreciate that there are no official plans as yet for this development, I feel the need to express my concerns.

When this proposal originally received airing at a community meeting back in 2010/2011 in Macmerry village hall I expressed my feelings over this development being adjoined to Chesterhall Ave, Macmerry. And the concerns I believe were duly noted at that time.

My issues were" I am against this plan as the exit and entry roads are not adequate for the development. The exit from Greendykes road is potentially dangerous and there has already been many near misses exiting the estate, as visibility to the right is very restricted especially being opposite a Primary School, and with traffic speeding through the village and commencing acceleration towards the 40mph at the Royal Bank of Scotland Data Centre.

An alternative exit from the proposed development was suggested and should be mandatory in the proposed plan.

children also have the freedom to play in Chesterhall Ave, knowing that the street is currently a cul-de-sac and drivers are aware of this. another 160 or so cars would make this street and as previously mentioned the exit extremely congested and unsafe.

To this date I have never had my issues/concerns addressed or responded to.

Yours

Mr William R Crawford

From: [Phil Mclean](#)
To: [Local Development Plan](#)
Subject: East Lothian Proposed LDP - representations about East Saltoun on behalf of Hamilton Farming Enterprises Ltd
Date: 03 November 2016 10:25:05
Attachments: [SEA Site Assessment - Dryden Field, East Saltoun.pdf](#)
[Dryden Field, East Saltoun - Statement of Site Effectiveness.pdf](#)
[Dryden Field, East Saltoun DFR e file.pdf](#)
[Representation form Draft Development Briefs East Saltoun.pdf](#)
[Representation form Draft Environmental Report East Saltoun.pdf](#)
[Representation form Proposed Plan East Saltoun.pdf](#)

Dear Sir/Madam,

Please find attached representations on behalf of Hamilton Farming Enterprises Ltd to the East Lothian Proposed Local Development Plan and its supporting documents.

The representations comprise the following attachments:

1. Representation regarding LDP *Proposed Plan*
2. Supporting *Development Framework Report* for Dryden Field, East Saltoun
3. Supporting *Statement of Site Effectiveness* for Dryden Field, East Saltoun
4. Representation regarding *Draft Development Briefs* (TT16: East Saltoun)
5. Representation regarding *Draft Environmental Report* (Site Assessment PM/TT/HSG012)
6. Supporting *SEA Site Assessment*

We look forward to confirmation of receipt of these representations in due course. Please contact us if you require any further information.

Kind regards,

Phil McLean

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Hamilton Farming Enterprises Ltd – Representations to Proposed Plan

Representation about East Saltoun

About You

What is your name?	Stuart Salter
What is your email address?	stuart@geddesconsulting.com
Postal Address:	The Quadrant 17 Bernard Street Edinburgh
Please enter your postcode:	EH6 6PW
Are you responding as (or on behalf of) a...?	Developer/agent/landowner
What is your organisation and role (if applicable)?	Organisation: Geddes Consulting Role: Director
Are you supporting the plan? If Yes: Please include your reasons for support	No

Section 2a - Tranent Cluster Main Development Proposals (pages 31-37)

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

Modifications(s) Sought:

Policy TT17 is as follows:

Policy TT17: Development Briefs

As part of any planning application for any allocated site, comprehensive masterplan solutions for the entire allocated site must be submitted. Proposed masterplans must conform to the relevant Development Brief prepared for the site.

Proposed masterplans must demonstrate how the relevant objectives for the allocated site will be secured, how development will be delivered on an appropriate phased basis, and set out design requirements to ensure the development will properly integrate with its surroundings and the character of the local area.

Hamilton Farming Enterprises Ltd proposes the following amendment:

Policy TT17: Development Briefs

*As part of any planning application for any allocated site, comprehensive masterplan solutions for the entire allocated site must be submitted. Proposed masterplans ~~must~~ **should generally** conform to the relevant Development Brief prepared for the site.*

Proposed masterplans must demonstrate how the relevant objectives for the allocated site will be secured, how development will be delivered on an appropriate phased basis, and set out design requirements to ensure the development will properly integrate with its surroundings and the character of the local area.

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

Justification for Modification(s):

The Council's site *Development Briefs* are based on limited information and surveys. It is probable that through further detailed survey and design, an acceptable proposal could be delivered. At this stage in the planning process, a degree of flexibility is necessary.

Accordingly, compliance with the site *Development Brief* should incorporate some flexibility.



Dryden Field, East Saltoun

Development Framework Report

Representation to Local Development Plan

November 2016

Contents

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4. Proposal	8
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The site presents a logical location for the expansion of East Saltoun.

1. Introduction

Introduction

East Lothian Council is seeking representations to the East Lothian Local Development Plan Proposed Plan (2016).

Hamilton Farming Enterprises Ltd owns land around East Saltoun. These representations are submitted on behalf of Hamilton Farming Enterprises Ltd.

This site has been allocated in the Proposed Plan - reference PROP TT16: *East Saltoun*. This site is allocated for 75 homes in the Proposed Plan.

The site lies within the East Saltoun Conservation Area. A considered and appropriate design solution for the site will preserve and enhance the Conservation Area.

The site is in a sustainable location and offers the potential to provide sustainable development. The site represents a logical expansion to the village.

This Report responds to the Site Assessment presented in the *Draft Environmental Report Appendix 7: Tranent Area Site and Strategic Environmental Assessments (SEA)*.

This Report also takes into account the Council's policy framework in the Proposed Plan, and in particular, the Development Brief for *East Saltoun, Tranent* which is part of Supplementary Guidance (*Development Briefs Pt1*).

This Development Framework Report highlights that the location of the access point, stated in the Council's *Development Brief*, should be moved to comply with the Council's *Standards for Development Roads*. The proposal demonstrates that this access can easily be accommodated.

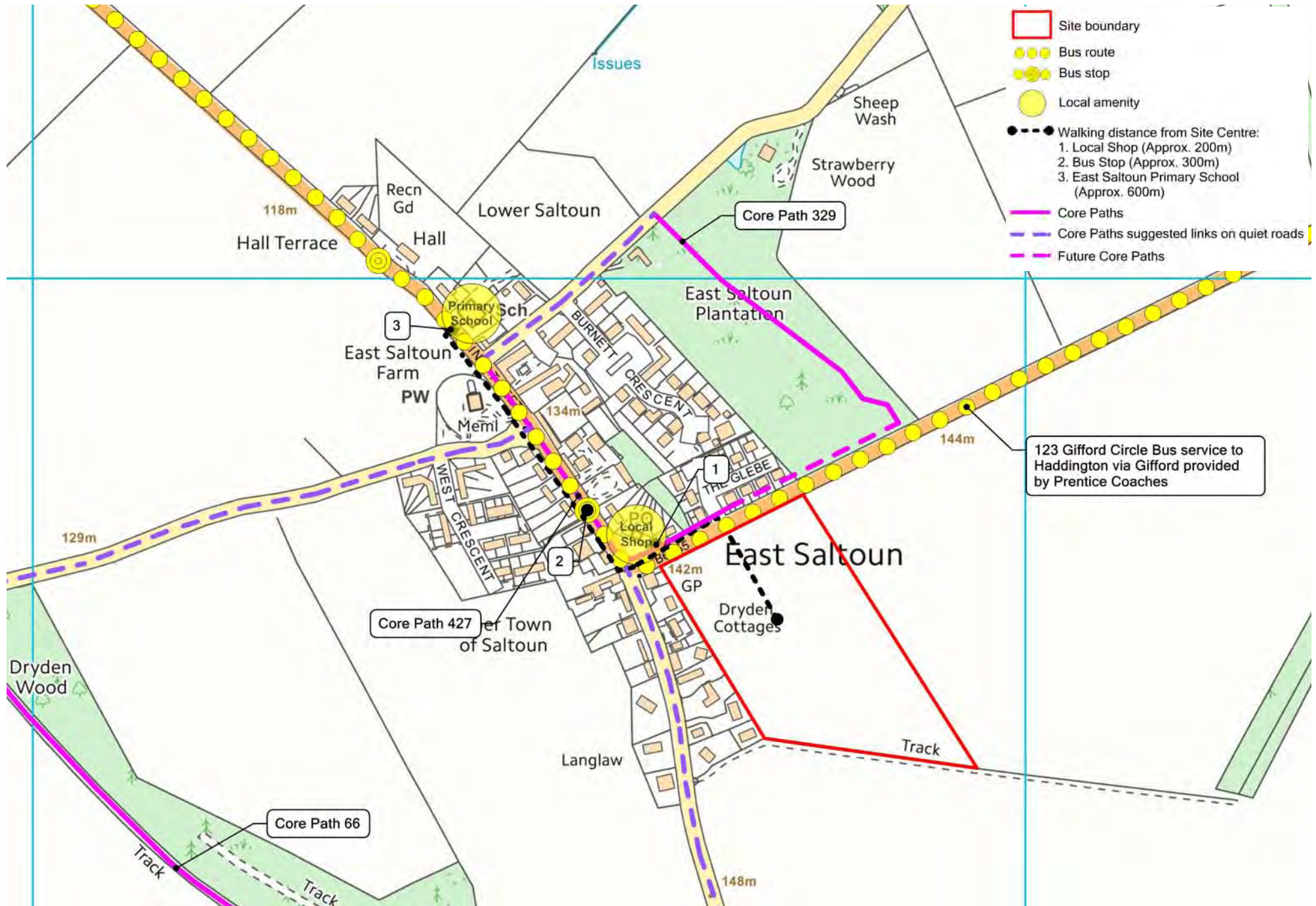
It provides more detailed information to the Council, updating the Council's assessment and highlighting ways in which mitigation measures, as part of the proposal, can address any potential impacts.

Meeting Housing Supply Target

As part of the representations to the Proposed Plan, the *Assessment of Housing Land Supply* concludes that the proposed development strategy outlined in the Proposed Plan does not meet the housing land target set by SESplan to 2019.

Further land allocations are required to meet the housing land requirements in full up to 2019.

Hamilton Farming Enterprises Ltd is committed to developing new homes on this site. This site is immediately effective and the proposal will be developed over a 4 year period from 2018.



The site is within easy walking distance of local amenities and bus stops within the settlement.

2. Sustainability of Location

In the SEA assessment for the site (Ref. PM/TT/HSG012), the Council states that *...East Saltoun is in a less accessible location in regional terms than many other East Lothian settlements and has a limited range of local facilities and services. Therefore development of this site would not be focusing development in the most accessible and sustainable locations. The site has limited access to public transport and its development would lead to an increase in car-based journeys.*

The site can readily access the Core Path Network via Core Path 427 and Core Path 329 adjacent to the northern boundary. The proposal will extend recreational walking and cycling routes within the village.

A bus service operates in the village. This provides public transport access to Haddington, Tranent and Gifford approximately every 2-3 hours during the day. The site is located within 400m of the nearest bus stop. This is an easy walk.

Bus services within East Saltoun could be improved as part of the development.

The local shop is located 200m walking distance from the site centre. This is an easy walk. Additional homes would provide further footfall to this shop, ensuring its ability to remain open.

The site is within the catchment area of East Saltoun Primary School. This school is within a 600m walk from the site centre.

For secondary schooling, the site is within the catchment area of Ross High School. As this school is located further than 2 miles from the settlement, all pupils within East Saltoun receive free transportation. This will extend to pupils within the proposal.

The Council highlights in its SEA assessment that East Saltoun *... has very limited capacity and cannot expand.* The Council also notes that Ross High School *... has no capacity, but may be able to expand.*

In its Supplementary Guidance: *Draft Developer Contributions Framework*, the Council states that *...Sufficient capacity currently exists within education facilities to accommodate the planned development at East Saltoun (proposal TT16).*

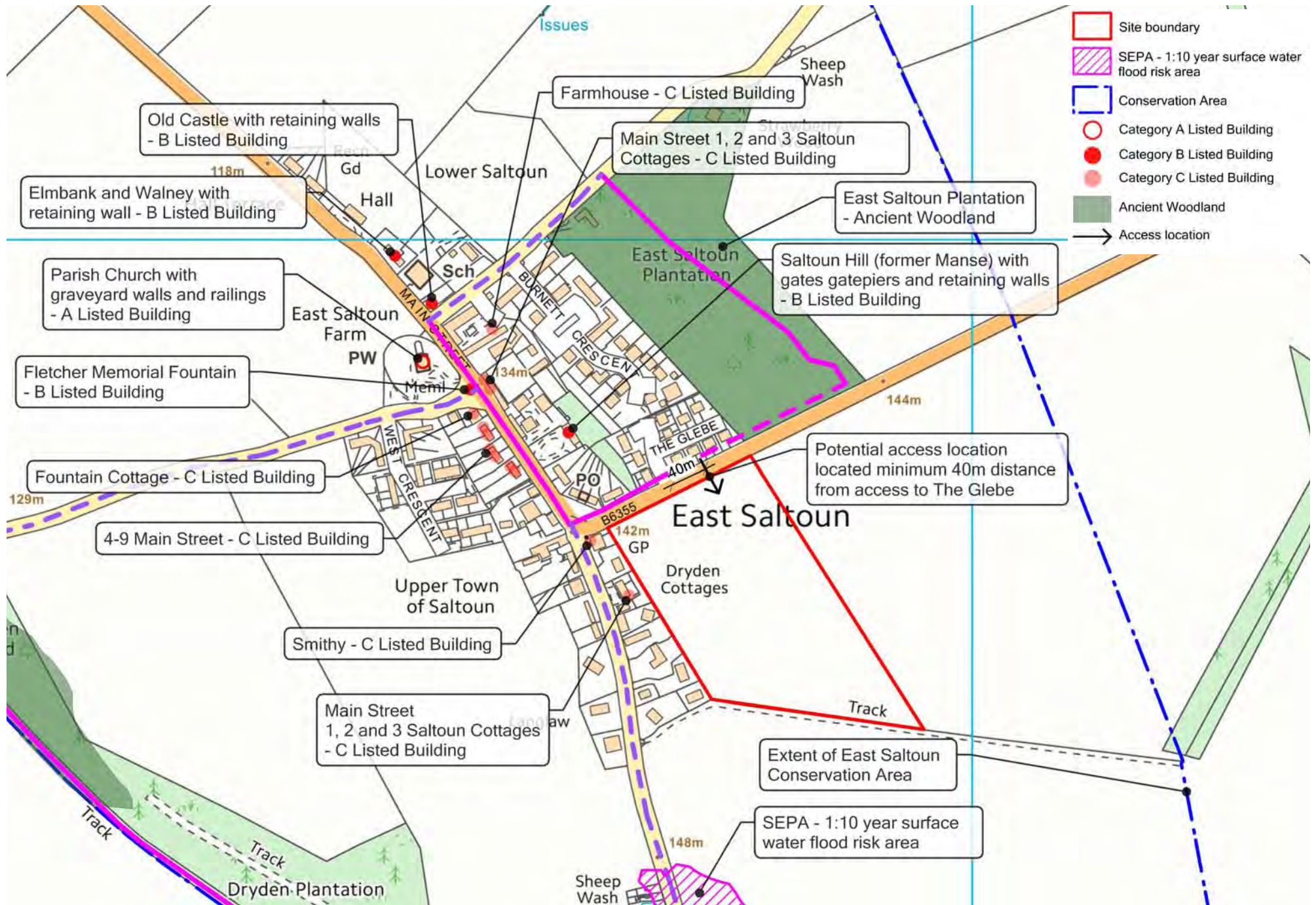
Saltoun Primary School catchment has a capacity of 75 pupils and a current school roll of 46 pupils at the 2014/15 pupil census. It currently has three composite classes (P1-2, P3-4 and P5-7) with only 4 pupils in Primary 1.

The 2014/15 pupil census confirms that up to 39% of available pupil capacity is not being used.

Further development in the village would help to sustain the school roll.

The site is within an easy walking distance of all facilities within the village, including the Local Shop, East Saltoun Primary School and nearby bus stops.

New homes within the village would help sustain these existing facilities and could facilitate improvements. This would improve the sustainability of East Saltoun.



The site provides the opportunity to preserve and enhance the character of the conservation area.

3. Site Appraisal

The site is located on the south eastern edge of East Saltoun. It is outside the existing settlement boundary but, as confirmed by the Council, is *...well related to it*. The site represents a logical expansion in terms of its urban context.

The landscape character area is defined as *Lowland Plains* (Lothians Landscape Character Assessment (1998)). The site has existing development on two sides and represents a relatively logical extension to the village in landscape terms.

The site is higher than much of the adjacent village which slopes downwards to the north. Although it would be visible in longer views from the Garleton Hills and Traprain Law Areas of Great Landscape Value (AGLVs), structural landscape planting proposed would mitigate the impact of development from longer distance views.

The site consists of a large field, sloping gradually northwards. It is currently in agricultural use.

The western site boundary is defined by existing housing behind an existing hedgerow.

The northern boundary is defined by further housing and woodland known locally as Strawberry Wood and marked on the Ordnance Survey map as East Saltoun Plantation. The Council's SEA confirms this is an area of priority habitat (upland mixed ash wood). There is no defined boundary to the east.

The southern boundary is defined by an existing hedgerow. There are 3 mature ash trees along this boundary. These trees and the hedgerow will be retained as part of the proposal in accord with the Council's *Development Brief*.

Access to the site can be taken from the B3655. The Council's *Development Brief* identifies an access to be located opposite The Glebe. However, a junction at this location would not be in accord with the Council's *Standards for Development Roads*. The Council's guidelines prefer a staggered junction arrangement and require a minimum junction spacing of 40m. This can be easily accommodated along the northern site boundary.

The site is within the *East Saltoun Conservation Area*. This Conservation Area designates a significant area of farmland around the village as well as the whole of the village. It is noted in the Council's SEA assessment that Historic Environment Scotland considers the site's development has the potential to fundamentally change the character of the Conservation Area.

Whilst a degree of change would happen, the landowner wishes to adopt a design strategy taking into account the findings from the Conservation Area Appraisal. This will ensure that the scale of impact is in keeping with and enhances the village's character.

Detailed design solutions will mitigate impacts on village character and scale. This includes incorporating guidance set out within the Council's Development Brief, such as adopting traditional roof forms, height and materials to reflect the wider built form and character of the village.

The Council acknowledges that there is low potential for unknown archaeological remains.

There are a number of Listed buildings within East Saltoun. These are located along Main Street and highlighted on the plan opposite. Development of the site will not adversely impact upon the setting of these Listed buildings.

Detailed design solutions are required to mitigate impacts on village character and scale. Future sales would be modest and the rate of development will help avoid a significant impact in a short period.

There are no physical constraints to the development of this site.



The proposal consolidates the existing settlement pattern and incorporates a new access from B6355.

4. Proposal

The proposal complies with Scottish Government's guidance on sustainable development presented in Scottish Planning Policy (SPP). It meets the Scottish Ministers' policy on *Designing Streets* as well as the design guidance and requirements set by the Council.

The site allocated for housing extends to 4.3 ha. It can accommodate up to 75 homes including 25% affordable homes, subject to further detailed studies including Cultural Heritage Assessment; Landscape and Visual Impact Assessment and Conservation Area Assessment.

Private housing would be made available for sale along with 19 affordable homes to be provided in accord with Council requirements.

The Estate is seeking to retain some of the private homes for private letting including holiday accommodation.

One point of access will be taken from the B6355 into the site. The proposed access is 50m east of the access location proposed in the Council's *Development Brief*. This allows for a staggered junction arrangement between the site and The Glebe, in compliance with Council guidelines

Pedestrian and cycle access will be provided via the B6355 at the northwest corner of the site. Pedestrian movement will be prioritised throughout the development.

The movement hierarchy will prioritise pedestrians and cyclists through the provision of shared surface lanes. Parking requirements will meet the Council's guidelines.

Shared surface lanes provide pedestrian and cycle routes between the village green and community woodland.

A footpath is provided along the southern edge of the B6355. This is set behind a proposed hedgerow which complements the hedgerow on the opposite side of the road.

A landscape edge comprising tree planting is provided to the eastern boundary to create an appropriate setting for new homes.

A landscape edge comprising shrub planting is provided to the southern boundary. This edge incorporates the three existing ash trees and existing hedgerow, which have been retained. This landscape treatment provides an edge to the village while maintaining southern views to the Lammermuirs.

The greenspace proposal has been designed as a linear village green, creating character and providing a focal point to the area.

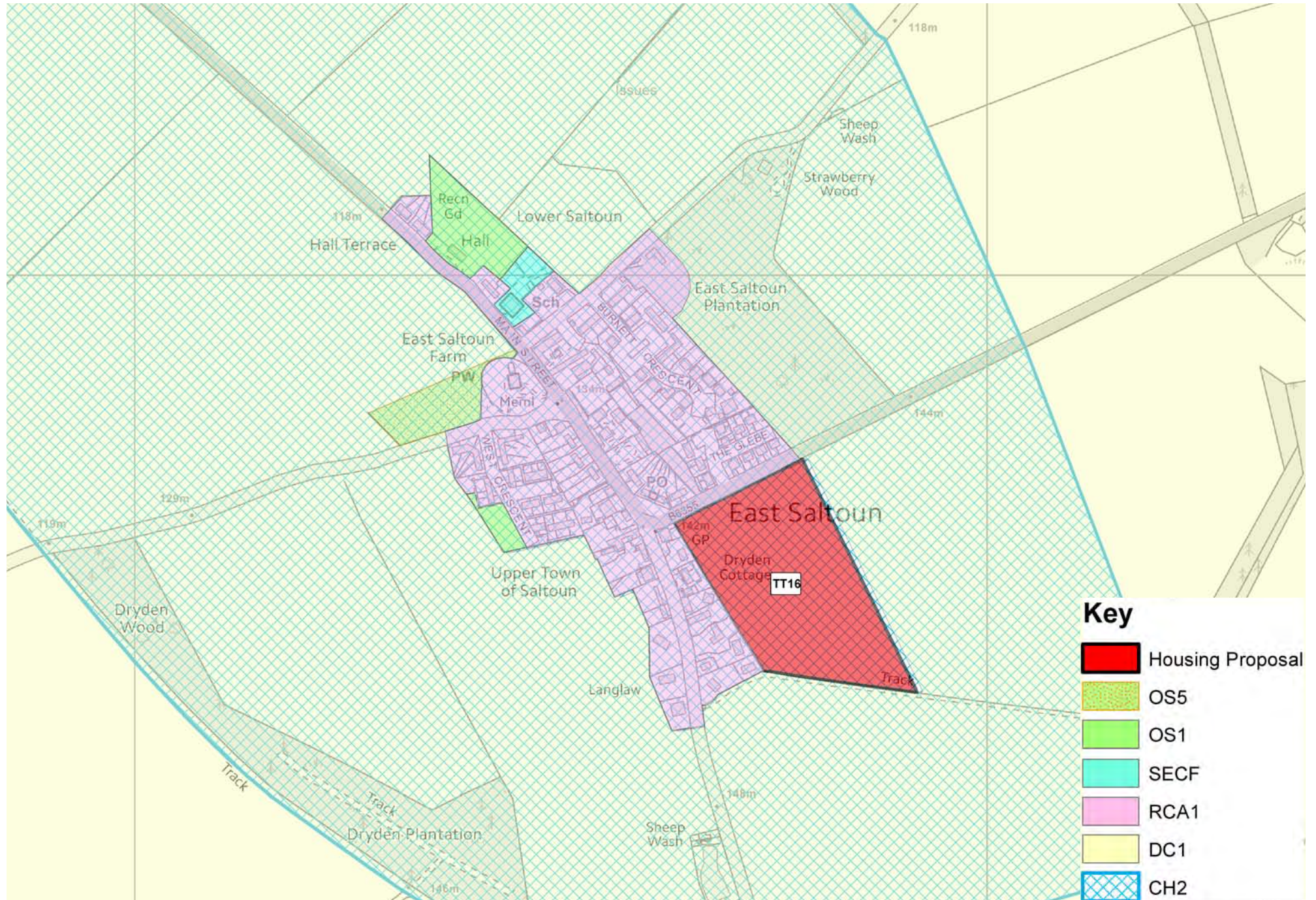
This greenspace will be overlooked, ensuring passive surveillance from adjacent homes and a safe environment.

Structure planting and greenspace proposals along the eastern, southern and western boundaries will help local biodiversity measures as well as providing a new play area.

The proposal incorporates SuDS measures which will aid biodiversity. Surface water discharge will be restricted to greenfield run-off rates and will be provided in accord with Scottish Water and Council requirements.

The proposal consolidates the existing settlement pattern and will preserve and enhance the character of the Conservation Area.

Consideration will be given to the design of new homes at the detailed design stage to ensure they respond to and complement the local character.



Key

- Housing Proposal
- OS5
- OS1
- SECF
- RCA1
- DC1
- CH2

Hamilton Farming Enterprises Ltd supports the Council's proposal to allocate the site for housing.

5. Recommendation for Proposed Plan

New development at East Saltoun can facilitate investment in the fabric of the community and improve its vitality.

The proposed design concept demonstrates that there is environmental and landscape capacity to accommodate this proposal as explained in this Report.

In its *Development Brief*, the Council proposes that vehicular access must be provided ...*adjacent to the east side of the village green*. A junction at this location would not be in accord with the Council's *Standards for Development Roads*.

Hamilton Farming Enterprises Ltd recommends that the Council modifies their *Development Brief (TT16 - East Saltoun, Tranent)* to propose a vehicular access which is a minimum of 40m to the east of the existing junction at The Glebe to comply with the Council's *Standards for Development Roads*. The proposal demonstrates that this can be accommodated.

In conjunction with the Conservation Area Appraisal, detailed design will ensure that the scale of impact is in keeping with and enhances the character of the village.

The site is a viable development proposal and is effective in accord with PAN 2/2010. It will be developed over the LDP plan period in accord with market demand.

Accordingly, Hamilton Farming Enterprises Ltd supports the Council's recommendation to allocate this site for up to 75 homes at Dryden Field, East Saltoun.



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Revision	Status	Prepared	Checked	Date
Version 1	Final	Steven Brown	Bob Salter	02/11/16



This document was prepared by Geddes Consulting.

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Dryden Field, East Saltoun Statement of Site Effectiveness

Introduction

Scottish Government now specifically requires local authorities to ensure that sites allocated in Local Development Plans are effective and can contribute completions during the development plan period. An effective housing site can finance necessary infrastructure costs. An effective housing land supply delivers a viable LDP.

The overall level of programmed annual completions from all sites in the effective land supply need to be sufficient to maintain a 5 year effective land supply at all times and so meet the identified housing requirement in the approved development plan, as well as meeting the shortfall identified by the assessment of housing need and demand in the Local Housing Strategy.

These policy requirements are set by Scottish Government in Scottish Planning Policy (SPP). A council now needs to be satisfied through its own appraisal that an allocated site is effective in order to comply with the Strategic Development Plan, following the guidelines set out by Scottish Government in PAN 2/2010 *Affordable Housing and Housing Land Audits*.

There is an expectation that all sites to be allocated in the LDP will be subject to testing by the Council and a conclusion reached as to the overall construction period (taking account of the developer's or house builder's lead-in period). This construction timeframe would then define the annual rate of completions expected. Currently, most house builders expect to deliver a house sale rate of 2 to 3 homes per month or between 24 and 36 sales per annum. Affordable housing requirements would be in addition to this but certainly provided before the development is completed.

PAN 2/2010 includes a series of criteria to test the effectiveness of individual sites. This guidance is used to assess whether a site or portion of a site is effective. By applying the tests of effectiveness in this guidance, it can be demonstrated that within the 10 year period of LDP under consideration, the site is capable of development for housing, being free of potential site constraints as set out in PAN 2/2010.

Outcome

Based on the appraisal of the criteria in PAN 2/2010, the proposal at Dryden Field, East Saltoun by Hamilton Farming Enterprises Ltd for up to 75 homes is an immediately effective site. This Statement explains how the proposal meets the tests of effectiveness in PAN 2/2010.

The proposal will be developed over a 4 year period from 2018. This will include private sales by a house builder, together with the building of affordable homes during this period.

Appraisal

This conclusion is based on the following analysis.

Criteria	Response	Comment
<p>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.</p>	<p>The site is owned by Hamilton Farming Enterprises Ltd and is part of the Hamilton and Kinneil Estate. It is immediately available for development.</p> <p>Interest in developing the site has been expressed by a national housebuilder.</p>	<p>Complies</p>
<p>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.</p>	<p>Adverse development factors give rise to abnormal development costs which can affect the viability of a site and hence its effectiveness.</p> <p>Appraisals of the site have been carried out to establish whether there are any constraints to development and what measures are necessary to enable development on the site. These appraisals also determine whether the site is viable for future development.</p> <p>The following assessments will be undertaken relating to the physical aspects of the site's future development:</p> <ul style="list-style-type: none"> • Engineering Assessment with Drainage Report, and Flood Statement; • Transport Statement; • Cultural Heritage Assessment; • Conservation Area Assessment; • Arboricultural Assessment; • Ecological Assessment; • Landscape and Visual Impact Assessment; • Air Quality Impact Assessment; • Environmental Noise Impact Assessment. 	<p>Complies</p>

	<p>The following comments are highlighted:</p> <ul style="list-style-type: none"> • The topography of the site can accommodate the necessary gradients and development platforms for the proposal without extensive ground modelling. • The development area is not subject to fluvial, pluvial or coastal flood risk as highlighted in SEPA's mapping. The SuDS measures ensure that run-off from surface water drainage will be discharged at greenfield rates. • The site can accommodate the scale of development proposed. One vehicular access point is proposed from the B6355. Additional path connections are proposed. • The site is used for arable purposes and is of low ecological value. Greenspace proposals along with gardens will enhance the biodiversity of the site. <p>There are no physical constraints on this site to either prevent development in accordance with the proposed Indicative Development Framework or require engineering works which will generate unacceptable abnormal costs.</p>	
<p>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.</p>	<p>The site is in arable agricultural use and is a greenfield site. Most of the site is prime agricultural land.</p> <p>There are no known contamination issues on site.</p>	<p>Complies</p>

<p>Deficit Funding: any public funding required to make residential development economically viable is committed by the public bodies concerned;</p>	<p>Hamilton Farming Enterprises Ltd is promoting the development of this site for new homes. The development principles are in accord with the Council's requirements.</p> <p>No funding from the public sector is required to make the development viable, except for the provision of subsidy for affordable housing. Hamilton Farming Enterprises Ltd is committed to providing 25% affordable housing in accord with the Council's policy.</p> <p>Hamilton Farming Enterprises Ltd is also willing to provide affordable (low cost home ownership) housing without subsidy to augment the supply of subsidised affordable housing to achieve the agreed overall requirement as necessary.</p>	<p>Complies</p>																																
<p>Marketability: the site, or a relevant part of it, can be developed in the period under consideration;</p>	<p>East Lothian is a prime housing market area. There is an ongoing and significant demand for a full range of market housing in the locality as well as affordable housing needs. There is considerable interest from house builders to develop in this location as this is a prime location for private housing.</p> <p>This is confirmed by the regional Housing Need & Demand Assessment (HNDA) and the Council's Local Housing Strategy. The Council has allocated sites in the locality as part of its development strategy for the Proposed LDP which recognises the area's marketability for housing.</p> <p>Given the outstanding shortfall in the supply of effective housing land, Hamilton Farming Enterprises Ltd expects one house builder to be constructing on the site, together with the Council or housing association to deliver 19 affordable homes.</p> <table border="1" data-bbox="577 1042 1541 1201"> <thead> <tr> <th>Dryden Field, East Saltoun</th> <th>16/17</th> <th>17/18</th> <th>18/19</th> <th>19/20</th> <th>20/21</th> <th>21/22</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Market</td> <td>0</td> <td>0</td> <td>15</td> <td>15</td> <td>15</td> <td>11</td> <td>56</td> </tr> <tr> <td>Affordable</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>19</td> <td>0</td> <td>19</td> </tr> <tr> <td>Total</td> <td>0</td> <td>0</td> <td>15</td> <td>15</td> <td>34</td> <td>11</td> <td>75</td> </tr> </tbody> </table>	Dryden Field, East Saltoun	16/17	17/18	18/19	19/20	20/21	21/22	Total	Market	0	0	15	15	15	11	56	Affordable	0	0	0	0	19	0	19	Total	0	0	15	15	34	11	75	<p>Complies</p>
Dryden Field, East Saltoun	16/17	17/18	18/19	19/20	20/21	21/22	Total																											
Market	0	0	15	15	15	11	56																											
Affordable	0	0	0	0	19	0	19																											
Total	0	0	15	15	34	11	75																											

<p>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;</p>	<p>Preliminary investigations confirm the following:</p> <ul style="list-style-type: none"> • Gas, electricity and telecoms can be provided; • Foul drainage from the site can be accommodated; and • Water supply to the site can be provided. <p>Infrastructure of the required capacity can be made available, subject to undertaking a DIA and WIA with Scottish Water.</p> <p>Pupils from this proposal will assist in maintaining the school roll at Saltoun Primary School.</p> <p>Appraisals carried out confirm that the school children from the development can be accommodated in the catchment schools taking account of the solutions presented by the Council in its Supplementary Guidance: <i>Developer Contributions</i>. Financial contributions to fund planning obligations will be available from Hamilton Farming Enterprises Ltd to fund any upgrades to infrastructure.</p>	<p>Complies</p>
<p>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.</p>	<p>Housing is the sole preferred use of the site.</p> <p>As a residential development, the site provides the full range of housing tenure to create a socially inclusive development.</p>	<p>Complies</p>

Hamilton Farming Enterprises Ltd – Representations to Draft Development Briefs

Representation about TT16 – East Saltoun, Tranent

About You

What is your name?	Stuart Salter
What are your contact details?	Email: stuart@geddesconsulting.com Postal address: The Quadrant 17 Bernard Street Edinburgh
If you submitted a representation on the Proposed Local Development Plan, please enter the reference number. You will find this on the email acknowledging receipt of your representation.	Local Development Plan reference:
Are you responding as (or on behalf of) a...?	Agent
What is the name of your organisation?	Geddes Consulting

Draft Development Briefs
<i>Do you have any general comments on the draft Development Briefs as a whole, or in relation to all briefs in any particular area? Do not include comments on specific briefs here. You will be asked for specific comments on particular draft Development Briefs in the next question.</i>
<p>The Council's <i>Development Briefs</i> are based on limited information and surveys. It is probable that through further detailed survey and design, an acceptable proposal could be delivered but the final solution may differ from that set out in the particular site <i>Development Brief</i>.</p> <p>At this stage in the planning process, compliance with a site's <i>Development Brief</i> still requires a degree of flexibility in its interpretation.</p> <p>Accordingly, compliance with an allocated site's <i>Development Briefs</i> should incorporate some flexibility.</p> <p>We note that the intention is for the <i>Development Briefs</i> to form non-statutory supplementary guidance. We agree that this is the appropriate status for these site <i>Development Briefs</i>.</p>
<i>Please choose the first Development Brief on which you wish to comment.</i>
TT16 – East Saltoun, Tranent

TT16- East Saltoun, Tranent
<i>What modifications do you wish to see made to the Development Brief TT16 – East Saltoun, Tranent?</i>
The Council proposes that vehicular access must be provided adjacent to the east side of the village green. Hamilton Farming Enterprises Ltd proposes that the vehicular access be moved by 40-50m eastward along the B6355.
<i>Please give reasons for your suggested change.</i>
<p>The Council's <i>Development Brief</i> currently shows the vehicular access location for the site to be directly opposite the existing vehicular access to The Glebe. Providing access at this location would create a crossroad junction.</p> <p>Moving the access location would allow for a staggered junction arrangement which is preferred in the Council's <i>Standards For Development Roads</i>. Moving the access location by 40-50m would allow for a junction spacing that complies with the Council's minimum standard of 40m.</p>

Hamilton Farming Enterprises Ltd – Representations to Draft Environmental Report

Representation about Site Assessment PM/TT/HSG012

About You

What is your name?	Stuart Salter
What is your email address?	Email: stuart@geddesconsulting.com
Are you responding as (or on behalf of) a...?	Developer/agent/landowner
What is your organisation and role (if applicable)?	Organisation: Geddes Consulting Role: Director
Please enter your postcode:	EH6 6PW
In the interests of transparency we will publish responses to this consultation. We will not publish personal email addresses. If you believe your intended response may contain sensitive or confidential information you should contact us to discuss this.	I consent to my response being published, including my name.

Section 8: Site Assessments (Appendices 5-10)

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

PM/TT/HSG012 Dryden Field, East Saltoun

The Council carried out a Site Assessment for the site at *Dryden Field, East Saltoun* submitted by Hamilton Farming Enterprises Ltd .

An exercise has been carried out reviewing this Strategic Environmental Assessment following the format and methodology adopted by the Council.

It is noted that the Council's assessment is based on an assessment of the site, excluding the mitigation measures which would be introduced by the proposal. Accordingly, a further assessment has been undertaken.

This SEA Site Assessment for Land at *Dryden Field, East Saltoun* (PM/TT/HSG012) is included as part of the representations to the Proposed Plan and Draft Environmental Report.

The conclusion reached is that the proposal scores more positively against the Council's assessment in the following SEA topics:

- **Water**
- **Air**

- **Climatic Factors**
- **Cultural Heritage**
- **Landscape**

The impacts of the proposal remain the same as the Council's assessment in the following SEA topics:

- **Biodiversity, Flora and Fauna**
- **Population**
- **Human Health**
- **Soil**
- **Material Assets**

This confirms that there are net environmental benefits now achieved, as explained in the updated SEA Site Assessment.

Overall, this update confirms that the site and proposal performs equally well as other sites allocated in the Proposed Plan within the Tranent Cluster.

Dryden Field, East Saltoun (SEA Ref: PM/TT/HSG012) SEA Site Assessment

- 1.1 The East Lothian Local Development Plan (LDP) Environmental Report Appendices contain detailed site assessments for all sites considered for inclusion in the LDP.
 - 1.2 Site Assessments were undertaken by the Council at Main Issues Report (MIR) stage for around 100 sites. These were sites submitted at Call for Sites stage, plus a number of additional sites. The Site Assessments carried out at MIR stage have been republished at the current Proposed Plan stage as Appendices to the *Draft Environmental Report*.
 - 1.3 *Proposed Local Development Plan Environmental Report Appendix 7: Tranent Area Site and Strategic Environmental Assessments* sets out the site assessment criteria that were used to consider whether a site was suitable for its proposed use at paragraphs 13 to 16.
 - 1.4 Paragraphs 17 to 22 of Appendix 7 set out the SEA objectives, site assessment questions, and SEA scoring approach used to predict and make judgements on the significance of the environmental effects of developing each site. The outcome of the SEA Site Assessment process was used to inform options presented in the MIR and allocations in the Proposed Plan.
 - 1.5 Hamilton Farming Enterprises Ltd has reviewed the Council's SEA Site Assessment for *Dryden Field, East Saltoun* (SEA Ref: Dryden Field, East Saltoun PM/TT/HSG012). It has been updated as appropriate to take account of the proposal's approach to sustainability and the introduction of mitigation measures where relevant.
 - 1.6 The updated Site Assessment scoring is presented in the table below alongside the Council's scoring. Commentary in the table highlights areas of agreement between the Council's assessment and the review by Hamilton Farming Enterprises Ltd. It also highlights areas of disagreement and explains the justification for the differences in scoring, taking account of the proposal.
 - 1.7 The conclusion reached is the proposal scores more positively against the Council's assessment in the following SEA topics:
 - **Biodiversity, Flora and Fauna**
 - **Water**
 - **Climatic Factors**
 - **Cultural Heritage**
 - **Landscape**
 - 1.8 The impacts of the proposal remain the same as the Council's assessment in the following SEA topics:
 - **Population**
 - **Human Health**
 - **Soil**
 - **Air**
 - **Material Assets**
- Conclusion**
- 1.9 The environmental impact arising from this proposed allocation is not as great as highlighted in the Council's appraisal of the site as the proposal can introduce mitigation measures which can significantly reduce impacts or improve sustainability.

SEA Ref: PM/TT/HSG012	Site Name	Biodiversity, Flora and Fauna	Population	Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
Council assessment	Dryden Field, East Saltoun	o/?	+/o	+/?	-	o	o	-	--	?/-	-/-/?
Hamilton Farming Enterprises Ltd assessment	Dryden Field, East Saltoun	+	+/o	+	-	o	o	-	--	o	o
Biodiversity, Flora and Fauna											
The Council confirms that the proposal <i>...is not within any areas designated for their international, national or local nature conservation interest.</i> It advises that there may be opportunities to extend or enhance the priority habitat (upland mixed ash wood) to the north of the site. The proposal includes landscaping along its boundaries which would connect to the priority habitat. Along with the introduction of gardens, all of this enables biodiversity enhancement to be provided in the proposal. The Council's score can therefore be upgraded.											
Population											
The Council considers the site will have a positive impact through the provision of housing, including affordable housing. The Council notes the site <i>...has limited access to facilities, services, and employment opportunities by active travel or public transport.</i> Hamilton Farming Enterprises Ltd agrees with this assessment.											
Human Health											
The Council confirms <i>...there is no known contamination within the site.</i> The Council identifies a number of short lengths of core path and open space within the village and adjacent to the site. The Council states <i>...the site's development may provide opportunities to enhance the local path network.</i> Hamilton Farming Enterprises Ltd agrees with this positive assessment. The proposal extends the local path network and provides additional open space within the settlement.											
Soil											
The Council confirms that the site is Class 3.1 prime agricultural land but notes there are no rare or carbon rich soils present. Most of, if not all of, the allocations in the Proposed Plan required the development of prime quality agricultural land. This factor is not determinant in the site selection process.											
Water											
The Council confirms that the site is not at risk of river, surface or coastal flooding as indicated on SEPA's flood map and that the site is <i>...not within a Potentially Vulnerable Area.</i> Hamilton Farming Enterprises Ltd agrees with this assessment. The site is not at risk of flooding and will not lead to an increased risk of flooding within the surrounding settlement. Furthermore, the proposed SuDS measures will maintain the ecological status of the water environment. The Council's score can therefore be upgraded.											
Air											
The Council states that <i>...Development on the site would not be affected by existing sources of air pollution. The site is in a location with access to local facilities and some limited public transport accessibility so the need to travel by car is reduced. Yet, the site's development would realistically still result in some increase in private car usage.</i> Hamilton Farming Enterprises Ltd agrees with this assessment.											
Climatic Factors											
The Council states that <i>...East Saltoun is in a less accessible location in regional terms than many other East Lothian settlements and has a limited range of local facilities and services.</i> Inevitably, development would result in some increase in greenhouse gas emissions due to an increase in car-based journeys. The Primary School, local shop and bus stops are all within an easy walk of the site. The proposal forms a logical expansion of appropriate scale to the existing settlement. The Council considers that the site does not lend itself to development that is resource efficient through siting (solar gain). Homes facing south east to south west can benefit from solar gain. The site is also sheltered from prevailing westerly winds by existing houses to the west. The Council's score can therefore be upgraded.											
Material Assets											
The Council considers the site's development would not make efficient use of land and resources, being greenfield land of prime agricultural quality. Hamilton Farming Enterprises Ltd does not dispute this assessment but notes that the same is true of the vast majority of all allocations in the LDP.											
Cultural Heritage											
The Council acknowledges that there is low potential for unknown archaeological remains. The Council states that <i>...The site is within the Saltoun Conservation Area.</i> The Council also notes that Historic Environment Scotland considers that development of this site <i>...has the potential to fundamentally change the character of the Conservation Area.</i> Hamilton Farming Enterprises Ltd wishes to adopt a design strategy in conjunction with a Conservation Area Appraisal to ensure the scale of impact is in keeping with and enhances the character of the village. A landscape buffer is proposed in the form of open space to the C Listed Saltoun Cottages to the west of the site and the proposal would not adversely impact upon the setting of Listed Buildings within the Conservation Area. The proposal will be designed such that it will preserve and enhance the character of the Conservation Area. Therefore the Council's score can be upgraded.											
Landscape											
The Council states that the site <i>...represents a relatively logical extension to the village in landscape terms.</i> However, the size of the site relative to the existing village may present significant impacts on the village character and the Conservation Area. Detailed design solutions can mitigate impacts on village character and scale. Structure planting along the eastern boundary of the site would mitigate the impact of development from longer distance views. A Landscape and Visual Impact Assessment will be carried out. The three mature ash trees on the southern boundary will be retained as part of the proposal. Landscape impacts will be minimised through detailed design solutions and mitigation such as structure planting. The proposal consolidates the existing settlement pattern. The proposal also extends greenspace within the settlement. The Council's score can therefore be upgraded.											

From: .
To: [Local Development Plan](#)
Subject: Proposed LDP
Date: 03 November 2016 10:30:40

Good morning,

In connection with the proposed local development plan I ask that Lothian SALTCOATS (NK7), FENTON GAIT EAST (NK8) and FENTON GAIT SOUTH (NK9) be removed as sites for housing development for the following reasons.

Brownfield sites should be developed before greenfield sites. It therefore seems premature to be considering any greenfield sites around Gullane before first developing out the old fire station site. The old fire station covers a large site and in my opinion the number of apartments and houses that could be developed on that site should more than equate to Gullane's share of housing development over the next number of years. The current proposals would be over-development at a scale beyond what is reasonable, having 3 major sites concentrated in the East of the village with an unprecedented 30% growth in the village.

From an infrastructure, transport and sustainability perspective it would make sense that a greater proportion of development takes place in towns and villages located on the main train line from North Berwick to Edinburgh. Given Gullane is not on a train line, from a strategic perspective the proposed number of housing sites in Gullane is far too many. A significant proportion of new residents would commute to Edinburgh via train. The nearest car park at Drem is already over capacity. Parking across the road from the Drem station next to the local residents housing is both limited and dangerous as it results in having to cross the road on a blind corner with cars travelling at 40 mph. This situation is particularly unsafe for mothers with young children. Equally commuting to the station by bike along the main road with cars passing at 60mph is not safe unless you are an experienced cyclist. There is no off road cycle path alternative to cycle from Gullane to Drem.

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

The cumulative impact on Gullane has not been properly assessed, nor has the impact on the rural road network, and in particular for the C111 towards West Fenton, where use by its many vulnerable users will become impossible. Currently the road is used by riding for the disabled. The road is narrow and reduces to one lane as it crosses the bridge.

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

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

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

The scale of change and a duration of development of more than 10 years will prove extremely difficult to mitigate thus impacting tourism and day to day life in the Village to an unreasonable level.

The impact on school and medical facilities will be major. Recent housing developments in Gullane have resulted in an average of 1 school pupil per new house. The proposal from East Lothian Council for only two additional classrooms were all the sites to proceed is totally inadequate. It is also worth noting that Gullane has an elderly population. I know from first hand experience that as these residents move into care or sadly

pass away, there homes are often bought by young families. The base position without any development is therefore that the number of children attending the primary school will increase. This point which is of fundamental importance does not appear to have been acknowledged.

I understand any development will have significant implications on the waste water treatment in the area with this already struggling at times when there are golfing events on in the area. Serious thought needs to be given in advance as to how this can be addressed before any new development takes place.

Yours sincerely,

Jamie Perry