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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 |
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# Proposed East Lothian Local Development Plan <br> 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
$\underline{\text { http://www.eastlothian.gov.uk/meetings/meeting/5908/east lothian council }}$

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: 01620827216

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

3 November 2016

Dear Sir or Madam,

## Proposed Local Development Plan 2016 <br> Representations on behalf of Omnivale Ltd <br> Objection on behalf of Omnivale Ltd to Proposal OS5

I enclose representations objecting to Proposal OS5: Potential Cemetery Extensions; Tranent Cemetery Extension: Church Street as set out on page 86 of the Proposed Local Development Plan and shown on Inset Map 35 Tranent.

Please contact me if you have any queries about these representations.

Yours faithfully,
$\qquad$

## The Proposed East Lothian Local Development Plan - Consultation

## Objections against Proposal PROP OS5: Potential Cemetery Extensions in respect of the proposal to extend Tranent cemetery onto land owned by Omnivale Ltd

Omnivale Ltd owns the $1.27 \mathrm{ha} / 3.13$ ac rectangular area adjoining the west side of Tranent cemetery which is allocated in the Proposed LDP under PROP OS5 as a potential extension to the cemetery.

Omnivale Ltd objects to the allocation of the site for cemetery use and considers that the site is suitable for residential development and should be allocated for this use in the LDP.

This site and the area on the east side of the cemetery were considered for allocation for residential development in the East Lothian Local Plan 2000. The Reporters' report published in 2001 recommended that the site be allocated and stated:
"29.50 It is concluded, therefore, that a modest development of the two fields either side of the existing cemetery would be acceptable in rounding-off the existing built-up area on the north side of Tranent. A substantial landscape buffer would be required on the northern edge of the site and the layout and design of any development should reflect the site's location on the northern edge of the town, adjoining the conservation area and the cemetery and close to the $A 1$. Consequently, the capacity of the site should be limited to approximately 60 houses."

The above comments confirm the suitability of the site for residential development. However, the Council decided not to follow the Reporters' recommendation and the sites were not allocated in the adopted 2000 or 2008 local plans.

The area shown as a potential extension to Tranent cemetery on the Proposals Map to the Proposed Plan was identified in the Main Issues Report as an "Alternative Site" for residential development (part of ALT-T7) and could accommodate 25-30 houses.

Please note that separate representations on behalf of Omnivale Ltd requesting allocation of the site for residential purposes and setting out the merits for this use have been submitted during the consultation period.

## Andrew McCafferty Associates

November 2016

Policy \& Projects Development
Partnerships \& Services for Communities
East Lothian Council
John Muir House
Haddington
East Lothian
EH41 3HA
2 November 2016
Reference: Planning Applications in respect of housing developments at Saltcoats (NK7), Fenton Gait East (NK8) and Fenton Gait South (NK9)

## Dear Sir,

Thank you for your letter 16/00587/PM dated 12 September 2016 acknowledging my letter objecting to proposals submitted in respect of development at the first two of the above sites.

I now write to object to the third application listed above. My reasons for doing so remain as stated in my previous two letters, dated 27 August 2016 and 10 September 2016. With my second letter I enclosed a further copy of my first letter. As you have received them, I shall not now forward copies of both letters.

My first letter provided full explanation for my objection. However, in summary, my principal reasons for objecting to these proposed developments are their scale relative to the local urbanised area and its facilites and the apparent lack of commitment to compel developers first to use land available in local brown field sites, such as the former Fire Services Training College.

Yours faithfully

AW Blackett


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Dear M. McFarlane.
East Lothian Local Development Plan lam wanting to lodge my objection to the above and advise that I support the alternative proposals put forward by) the Muvorelburgh Conserveubion Society as set out in the attached letter.

Yous sincerely

## Musselburgh Vision or settlement strategy for incorporation in the new Local Plan

We know that a lot of housing is proposed in and around Musselburgh - far too much the Society will argue. The question is where should it go and on what basis should that decision be made?

The new Local Plan proposes a haphazard allocation based partly on sites identified by developers. There is no vision on what Musselburgh should look like in the future, no overall plan for change.

The Conservation Society has put forward an alternative. It is a vision for a lesser amount of housing provided in a more systematic way. It is based on what gives the town its identity and character now, what's good and should be preserved and protected and where development might go to cause least damage. It is not a NIMBY or anti-development strategy - it's about getting the right amount of development in the right places whilst protecting acknowledged assets.

Important factors are: maintaining separation from neighbouring settlements, the relationship with the adjoining countryside and respect for the area's history

We have identified four open space lungs, largely areas of Green Belt, which achieve this and should be protected from development, long term in our view. They mostly comprise class 1 agricultural land and together they provide breathing space, give the town a separate identity by avoiding coalescence, bring the countryside into the town and safeguard its landscape setting, including the setting of the historic Battle of Pinkie Cleugh. These are all key planning objectives.

The four areas are:

1. To the west the Brunstane/Newhailes area that separates Musselburgh from Edinburgh. Unfortunately it looks like the Brunstane area is to be developed as part of the Edinburgh Local Plan leaving only Newhailes parkland as open land here.
2. The open land west of the river Esk that brings the countryside into the town from south of the A1, through Monktonhall Golf Course, all the way to the Olive Bank bridge.
3. The large area east of the river from Carberry, across Howe Mire and into Lewisvale Park. This is particularly important because it is at the core of the historic battlefield site and gives the outstanding Inveresk Conservation Area its separate identity.
4. The north east coastal strip from Levenhall Links through to Royal Musselburgh Golf Course including the Goshen Farm and Drummohr areas which provide an undeveloped buffer to the adjoining nature conservation area. Overall the area provides separation from Prestonpans, maintains the undeveloped waterfront, protects the designed landscape of Drummohr House and contains another key area of the battlefield site.

It is our view that there should be no significant development in these areas though one or two small sites will be suitable for housing where the aims of the strategy would not be compromised, notably the Cala Homes site at Levenhall and on land south of Whitecraig, but certainly not development at Howe Mire as proposed in the new Local Plan or on the narrow strip of land by Wallyford station that separates Wallyford from Musselburgh as is currently proposed, in a speculative planning application.

Where development should be directed now and long term (i.e. in any future Local Plan) is to the rear of existing built up areas (a) up to the A1 to the south east of the town. i.e. the Wallyford development now underway, and (b) south west of the town around QMU and Craighall where generated traffic can be directed onto upgraded A1 junctions and away from the town centre.

BARRY TURNER on behalf of Musselburgh Conservation Society
September 2016

Policy \& Projects
Partnerships \& Services for Communities
East Lothian Council
John Muir House
Haddington
EH41 3HA
$3^{\text {rd }}$ November 2016
Dear Sir or Madam,

## Proposed Local Development Plan 2016

Representations on behalf of Omnivale Ltd
Land on the west side of Tranent Cemetery
On behalf of Omnivale Ltd I enclose representations seeking allocation of land on the west side of Tranent Cemetery for residential purposes. These representations are objections to the non-inclusion of the site for residential development and should be cross-referenced to a separate objection to the designation of the site as Proposal OS5 as a potential cemetery extension.

Please contact me if you have any queries about these representations.
Yours faithfully,

Andrew McCafferty

## The Proposed East Lothian Local Development Plan - Consultation

## Objections to the non-allocation of land on the west side of Tranent cemetery for residential development

These objections are made on behalf of Omnivale Ltd, owners of the 1.27 ha/3.13 ac rectangular area adjoining the west side of Tranent cemetery, ref. SDP/TT/HSG 005 - Site C in the Detailed Site Assessments for the Tranent area. A site plan is attached scale 1:1000 @A3 ref. 15006(PL)101

This site and the area on the east side of the cemetery were considered for allocation for residential development in the East Lothian Local Plan 2000. The Reporters' report published in 2001 recommended that the site be allocated and stated:
"29.50 It is concluded, therefore, that a modest development of the two fields either side of the existing cemetery would be acceptable in rounding-off the existing built-up area on the north side of Tranent. A substantial landscape buffer would be required on the northern edge of the site and the layout and design of any development should reflect the site's location on the northern edge of the town, adjoining the conservation area and the cemetery and close to the $A 1$. Consequently, the capacity of the site should be limited to approximately 60 houses."

The above comments confirm the suitability of the site for residential development. However, the Council decided not to follow the Reporters' recommendation and the sites were not allocated in the adopted 2000 or 2008 local plans.

The site was identified as an "Alternative Site" for development in the Main Issues Report 2014 but not allocated for residential development in the Proposed LDP. We request that the site be allocated for residential development in the LDP.

## Physical characteristics, location and function of the site

This small site was last used for agricultural purposes prior to 1996 and is no longer suitable for this use because of its small size and proximity to urban uses. The site is well related to Tranent and is enclosed by the B6371, Tranent Mains Road, Tranent Cemetery and new housing.

The site is at a lower level than the recently developed housing by Redrow at Forthview Walk and slopes gently down from its boundary with this housing northwards towards the B6371 and Tranent Mains Road. There is a structural landscaped belt along the southern boundary of the site where it adjoins housing in Forthview Walk. There are also landscaped areas between the site and the A1 which were created when the junction was altered and upgraded as part of improvements to the A1 in the early-mid 1990's.

A photograph of the site is attached taken in January 2004 from the approach road (A198) to the roundabout on the south side of the A1. This shows the housing built out by Redrow which breaks the ridgeline. The site subject of these representations lies below the new housing and has the appearance of a "left over" piece of land lacking any function.

## Assessment of this site in Appendix 7 of the Draft Environmental Report 2016, Tranent Area Site and Strategic Environmental Assessments

## Accessibility

There are bus stops along Church Street in close proximity to the site and residents can easily access a choice of services from these stops. The site is within easy walking distance of Tranent town centre.

## Exposure

The site does not lie in an exposed location. There is a landscaped belt which adjoins the northern side of the site and a substantial landscaped belt would be included along the northern edge to screen development as well as creating shelter.

## Material Assets

Development of this site would make beneficial use of a small area of land which is not currently being used. It is too close to housing and roads to be used efficiently for agricultural purposes.

## Landscape

We welcome the comments under "Landscape" and conclude that the site could be developed without harming the setting of Tranent Conservation Area or listed buildings. Similarly, residential development need not harm western views from the cemetery.

## Residential capacity of the site

Allowing for appropriate landscaping on the peripheries, this site could accommodate 25-30 houses.

Built development can be accommodated without harming the setting of Tranent. A well designed and landscaped residential scheme would enhance the appearance of this site and the northerly entrance into Tranent.

We request that this site is allocated in the East Lothian Local Development Plan for residential development with a capacity of 25-30 units.

## Andrew McCafferty Associates

## November 2016




Policy \& Projects<br>Partnerships \& Services for Communities<br>East Lothian Council<br>John Muir House<br>Haddington<br>EH41 3HA

3 November 2016

Dear Sir or Madam

Proposed Local Development Plan 2016
Representations on behalf of Omnivale Ltd
Land on the east side of Tranent Cemetery, Tranent

On behalf of Omnivale Ltd I enclose representations seeking the allocation of land on the east side of Tranent Cemetery for residential purposes. These representations are objections to the non-inclusion of the site for residential development

Please contact me if you have any queries about these representations.

Yours faithfully,

Andrew McCafferty

# The Proposed East Lothian Local Development Plan - Consultation 

## Objections against the non-allocation of land on the east side of Tranent Cemetery for residential development

These objections are made on behalf of Omnivale Ltd, owners of the 1.49 ha / 3.88 acres of undeveloped ground adjoining the east side of Tranent Cemetery. The site has a reference SDP/TT/HSG005 - Site B in the Detailed Site Assessments for the Tranent area in Appendix 6 of the Interim Environmental Report published with the Main Issues Report and is also included in Appendix 7 of the Draft Environmental Report accompanying the Proposed LDP 2016. The site had an "Alternative Site" status in the Main Issues Report and should be allocated for housing (Class 9) in the Proposed LDP.

This site and the area on the west side of the cemetery were considered for allocation for residential development in the East Lothian Local Plan 2000. The Reporters' report published in 2001 recommended that the site be allocated and stated:
"29.50 It is concluded, therefore, that a modest development of the two fields either side of the existing cemetery would be acceptable in rounding-off the existing built-up area on the north side of Tranent. A substantial landscape buffer would be required on the northern edge of the site and the layout and design of any development should reflect the site's location on the northern edge of the town, adjoining the conservation area and the cemetery and close to the A1. Consequently, the capacity of the site should be limited to approximately 60 houses."

The above comments confirm the suitability of the site for residential development. However, the Council decided not to follow the Reporters' recommendation and the sites were not allocated in the adopted 2000 or 2008 local plans.

Attached is a red line ownership plan which has a capacity of approximately 30 dwellings.

## Physical characteristics, location and function of the site

This small site was last used for agricultural purposes prior to 1996 and is no longer suitable for this use because of its small size and close proximity to the urban edge of Tranent. The site is enclosed by Tranent Mains Road on two sides, Tranent Cemetery on its western side and new housing to the south. It is well related to Tranent.

The site is at a lower level than the recently developed housing by Redrow at Forthview Walk and slopes gently down from its boundary with the new housing northwards towards Tranent Mains Road. There is a structural landscaped belt along the southern boundary of the site where it adjoins housing in Forthview Walk. There is also a landscaped area between Tranent Mains Road and the Bankton junction which was created when the
junction was altered and upgraded as part of improvement works to the A1 in the mid - late 1990's.

Attached is a photograph of the site taken in January 2004 from the bridge (A198) going over the A1. This clearly shows the land subject of these representations lying below the ridge line and below the level of new housing that was constructed in the early 2000's. Like land in the same ownership lying to the west side of the cemetery, this site has the appearance of a "leftover" area on the urban fringe which does not contribute positively to the setting of Tranent. Careful landscaping around development on this site would make a positive contribution to the appearance of this part of Tranent.

## Assessment of this site in Appendix 7 of the Draft Environmental Report 2016, Tranent Area Site and Strategic Environmental Assessments.

The assessment in the Draft Environmental Report recognises the potential of this site for housing development and states that it may present an option for housing development. In discussing "Location" the assessment accepts the site's close relationship to Tranent.

## Accessibility

The site is within easy walking distance of bus stops at Bankton junction and traffic generated by development of the site could access the A1 easily without having to go through the town centre. Two vehicular access points can be achieved to/from the site in accordance with advice in Designing Streets.

## Exposure

The site does not lie in an exposed location. There is a landscaped area adjoining the northern side of Tranent Mains Road which forms part of the landscaping works for the A1. A substantial landscaped belt would be included along the northern edge of the site to create shelter as well as screening new development.

## Suitability for Proposed Use

We do not accept that either noise or visual impact from new housing on the site would impact upon visitors to the adjacent cemetery. Housing would not be a "bad neighbour" and there are many examples of housing in proximity to cemeteries without causing problems to amenity.

Houses can be designed if necessary with windows which have double or triple glazing to mitigate against noise emanating from traffic using the A1. Noise from the A1 should not prevent this site from being allocated for residential development.

## Deliverability/Effectiveness

Land adjoining the south of this site was subject to underground coal mining but this did not prevent the land from being effective for new housing. The same is true of the land on the east side of the cemetery.

## Material Assets

Development of this site would make beneficial use of a small area of land which is not being used. It lies too close to housing and roads to be used efficiently for agricultural purposes.

## Landscape

We welcome the comments under 'Landscape' and conclude that with careful landscaping around the peripheries, the site could be developed without harming the setting of the town.

## Residential capacity of the site

Allowing for appropriate landscaping around the peripheries, this site could accommodate approximately 30 houses.

## Safeguarding of land to enable a junction improvement in connection with a potential eastern by-pass of Tranent

This site has a potential role in enabling a junction improvement related to a future eastern by-pass for Tranent. The north east corner of the site is near to a sharp right-angled bend in Tranent Mains Road and land in the vicinity of this bend within the site would be required to enable a new junction for the by-pass. Housing units could be set back from the north east corner of the site to enable sufficient room for the improvement.

## An enhancement to the setting of Tranent

Development of this small site would consolidate the northern edge of the town and careful landscaping would enhance the appearance of the site which currently appears to be a "leftover" piece of land with no distinct function and an unkempt appearance.

We request that this site is allocated in the East Lothian Local Development Plan for residential development for approximately 30 houses (Class 9).

## Andrew McCafferty Associates

November 2016



Our Ref: SV9318
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03 November 2016
Edinburgh EH3 8EG
Tel: 0131-229 3800
Policy \& Projects
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East Lothian Council
John Muir House
Haddington
EH41 3HA

Dear Sir /Madam

## EAST LOTHIAN PROPOSED LOCAL DEVELOPMENT PLAN CONSULTATION

We act on behalf of our client Haig Hamilton in relation to Land to the East of Athelstaneford. We herewith submit a representation to the East Lothian Proposed Local Development Plan Consultation.

Representations have been made to the East Lothian Local Development Plan Engagement Discussion Paper in 2012 and more recently to the East Lothian Local Development Plan Main Issues Report in February 2014.

The Proposed Plan was heard at East Lothian Council's Full Committee in December 2015 however the land was not recommended for residential development, as promoted by our client.

Our client has instructed a Design Statement to be prepared as part of this submission. EMA Architects have prepared this statement to illustrate how the site at Athelstaneford can be delivered. It provides a site context and an indicative layout plan (also attached at Appendix 1) for the delivery of the site for a residential development of approximately 30 units. This statement was previously submitted to East Lothian Council in February 2014.

The Design Statement concludes that the site represents an excellent opportunity to provide much needed family housing within an area already suited to this type of development.

## Our client proposes that the Land to the East of Athelstaneford be allocated for residential development for the reasons set out below:-

## Scottish Planning Policy

Scottish Planning Policy 'encourages rural development that supports prosperous and sustainable communities, whilst protecting and enhancing environmental quality'. It is submitted that the allocation of Land to the East of Athelstaneford for residential development will allow for the existing facilities within the village to be utilised. This includes a primary school, village hall and a Church. Scottish Planning Policy requires development plans to promote a sustainable pattern of development appropriate to the area, particularly by co-ordinating housing development with infrastructure investment, such as education facilities.

It is submitted that our client's land would be in accordance with Scottish Planning Policy with respect to rural development and directing in to the right place.

## SESplan and Strategic Development Areas

SESplan locates Athelstaneford within the East Coast Strategic Development Area. The SDAs are areas which have been identified as the focus for future growth. SESplan states that 'the promotion of modest additional growth of existing settlements to accommodate further growth should be supported.'

It is submitted that our client's land to the East of Athelstaneford should be allocated for residential development, and, as such, would be in accordance with SESplan Policy.

## Proposed Strategic Development Plan

The Proposed Strategic Development Plan is to replace the current plan in 2018. It is considered a material planning consideration, particularly in the creation of new Local Development Plans.

The Proposed Plan states that member authorities should consider deallocating sites carried over from multiple plan cycles where action taken has proved ineffective in making them deliverable over a number of plan periods.

It is submitted that Site H8, discussed at length below, should be deallocated in the Proposed East Lothian Local Development Plan in favour of our client's site at Land to the East of Athelstaneford.

Our client is committed to the development of Land to the East of Athelstaneford, should it be allocated for residential development. The site would therefore contribute towards the required housing land supply figures and can be developed within the plan period.

## Adopted East Lothian Local Plan - Allocation H8

Site H 8 is an allocated site for residential development within the Adopted East Lothian Local Plan. The site has been allocated within the Local Plan since 1998, a period spanning over 18 years. A planning application (ref: $08 / 00148 /$ FUL) was submitted for the erection of 19 houses and associated works on this site in 2008. The application was never determined and no development has been forthcoming. Since that time no planning permission has been granted on site and it would appear that the site is not coming forward for development.

## The Glebe Greenspace Project

Throughout discussions with our client it is apparent that the community of Athelstaneford is utilising the open space at the Glebe (Allocation H 8 ) as a public amenity area, where mazes and other outdoor activities are taking place.

It is noted that on 30 April 2014, the trustees of the Church of Scotland offered the Athelstaneford Glebe (Allocation H 8 ) to the community for five years, hoping to develop a green space for the village which actively brings the community together. The Glebe Greenspace Project features on the Athelstaneford Village website and involves both a Mission Statement and active working group:-
https://athelstaneford.wordpress.com/glebe-green-space/

The Vision of the Glebe greenspace is to promote an active use which is shared and valued by the Athelstaneford community. The objectives of the project include to:-

- Provide opportunities for working together for the common good
- Cultivate land to grow vegetables and fruit
- Create opportunities to practice traditional rural and artistic activities
- Enhance the natural beauty and biodiversity of the land
- Share skills and knowledge
- To provide a place to rest and meditate to be at one with nature

The working group acknowledge that the land is potentially an asset for the local community and that up until now it has remained undeveloped.

Works have already started on site with the creation of vegetable beds and planting. The Church has donated an initial $£ 1200$ start-up fund and local farmers and businesses have also been involved in providing materials.

It is considered that the historic allocation for residential development at the Glebe (Site H 8 ) is not suitable and has been unable to attract investment.

It is submitted that our client's land to the East of Athelstaneford should be allocated for residential development in order to allow for further growth within the village, and in doing so allowing the local community to continue operating within the open space offered by the Glebe (Allocation H 8 ).

The allocation of our client's site will incorporate effective links with the Glebe Greenspace Project in order to integrate with both the Glebe and the rest of the village. It is submitted that our proposed development could enhance this project and incorporate effective pedestrian links with the Glebe site.

Our client is committed to the development of Land to the East of Athelstaneford, should it be allocated for residential development. The site would therefore contribute towards the required housing land supply figures and can be developed within the plan period.

## Main Issues Report - Interim Environmental Report

Appendix 9 of the Interim Environmental Report assesses the site against its suitability and delivery. The site scores well against criteria such as location, accessibility, suitability for proposed use, fit with strategic policy objectives, physical infrastructure capacity and deliverability.

The report has concluded that the primary school has very limited capacity leading to concerns of service infrastructure capability. We have previously met with East Lothian Council's Education Department, who have confirmed that there is capacity at Athelstaneford Primary School to accommodate a development of approximately 30 houses at Athelstaneford.

It is our understanding that Athelstaneford Primary School is actually declining in pupil numbers. There is a concern regarding the education facility afforded to Athelstaneford and that this facility will be lost. It is submitted that rural communities such as Athelstaneford should be able to expand especially in circumstances where a new development can help to maintain the existing and very important facilities.

It is therefore concluded that the Interim Environmental Report provides a strong justification for the development of the site for residential use. It is submitted that the development of the site will protect and enhance the environmental quality whilst ensuring the sustainable development of the village.

## Housing Land Supply

The SDP sets an overall housing land requirement for the SESplan area of 107,545 homes up to 2024. To meet this total, land capable of delivering 74,835 homes is to be available in the short term up to 2019 , with land capable of delivering a further 32,710 homes to be available up to 2024. The distribution of this housing land across the region has been confirmed by Ministerial approval of SESplan's Supplementary Guidance on Housing Land. Of this regional total, SESplan's Supplementary Guidance on Housing Land identifies that, for East Lothian, land capable of delivering 10,050 homes will be needed up to 2024, with an interim requirement for land capable of delivering 6,250 homes up to 2019. An adequate five year effective housing land supply is to be maintained at all times.

The Proposed Local Development Plan for East Lothian states that:-
> "...building new homes at the rates and in the volumes expected by the SDP will be extremely challenging, including for housing providers. Even though a generous housing land supply has been made available by the plan at the point of adoption, an inability to build homes on the land supply at the rate expected to meet SDP requirements when the plan is operative could lead to calls to release additional sites for alternative housing proposals on land not identified as suitable in principle for that purpose by the plan, and thus a very serious and unjustified threat to the delivery of the plan's strategy and sites."

Alternative sites should be identified which can help meet the housing requirements to 2019 and in the period 2019-2024, helping to maintain an effective five year housing land supply. It is considered that there are a number of sites that are identified for development that are not effective sites and may not come forward during the plan period.

There is currently a land allocation within Athelstaneford at the Glebe (Site H8). The site has been designated within the Local Plan for over 18 years, and it is considered, that if this site is not coming forward to meet the Council's housing land requirements, then alternative sites should be considered.

It is submitted that there will be a number of development such as this, which do not come forward for development, and this should not preclude other sites from being identified for development purposes. It is submitted that preference for housing land release should be within the SDA, as supported by SESplan.

It is submitted that there should be more flexibility for small scale developments in rural areas. It is accepted that SDP Policy 7 allows the LDP to make small scale allocations of housing development on Greenfield land within and outwith the SDA. It is understood that the SDP requires the local authority to do this by way of a plan-led approach to identification of Greenfield sites for housing development in the countryside. However, it is considered that there should be more flexibility to allow these sites to come forward for development, especially if they are within the SDA and will positively contribute towards the rural settlement they are adjacent to.

The Proposed Strategic Development Plan states that member authorities should consider deallocating sites carried over from multiple plan cycles where action taken has proved ineffective in making them deliverable over a number of plan periods.

It is submitted that Site H8 should be deallocated in the Proposed East Lothian Local Development Plan in favour of our client's site at Land to the East of Athelstaneford. Our client is committed to the development of this site, should it be allocated for residential development, therefore contributing to the housing land supply as required by the Strategic Development Plan.

It is submitted that the extension of Athelstaneford would encourage the sustainable development of the village whilst protecting and enhancing the environmental quality.

## Rural Community

It is considered that the development of the site would allow for growth within Athelstaneford, which would help to maintain small communities where there is a primary school, Church and village hall. This is supported by a report prepared by Nick Wright Planning entitled East Lothian Rural Voice (January 2013), which provided feedback from the local community on the benefits of citing new housing in rural villages.

The expansion of Athelstaneford with a small scale residential development will allow for these facilities to be utilised. It is clear from the Rural Voice report that there is huge importance and a need for these facilities within rural villages such as Athelstaneford, and support for their maintenance and longevity.

## Athelstaneford Primary School

An allocation of land to the east of Athelstaneford for small scale development, as proposed by our client, will encourage a new influx of residents, which will include families with children. As part of any planning permission for residential development there will be a requirement for education contributions towards Athelstaneford Primary School and North Berwick High School. The influx of new families to the area will increase the pupil attendance at Athelstaneford Primary School, which we are advised is at a low capacity and requires more pupils.

Throughout discussions with East Lothian Council it is apparent that information has been misleading within the Main Issues Report, where it has previously been stated that Athelstaneford Primary School has limited capacity.

We met with Jimmy McGuinnes of East Lothian Council in September 2015, where we were advised that the recent roll projections show that Athelstaneford Primary School's roll is likely to peak around 56 pupils, and therefore there is sufficient spare capacity to accommodate the likely pupils from our client's proposed development. We hereby attach correspondence in this respect at Appendix 2.

It is submitted that new housing development in the catchment areas of smaller schools will help to sustain their pupil rolls and ensure that local facilities within Athelstaneford are utilised.

## Conclusions

Our client is committed to the development of Land to the East of Athelstaneford, should it be allocated for residential development. The site would therefore contribute towards the required housing land supply figures and can be developed within the plan period.

As part of any planning permission for residential development there will be a requirement for affordable housing. Our client is committed to ensuring that the development accords with the necessary policy requirements for affordable housing.

Our client proposes that Land to the East of Athelstaneford be allocated for residential development, and should be welcomed as a sustainable future investment within the village.

We trust that the above is satisfactory and that you are in a position to accept our representation. If you have any queries please do not hesitate to contact Andrew Munnis of this office direct.

We should be grateful if you would acknowledge receipt of this letter.

Yours faithfully,

## Montagu Evans LLP

## APPENDIX 1

INDICATIVE LAYOUT PLAN


## APPENDIX 2

From:
Sent:
To:
Cc:
Subject:

McGuinnes, Jimmy [jmcguinnes@eastlothian.gov.uk](mailto:jmcguinnes@eastlothian.gov.uk)
02 September 2015 09:03
Ally Campbell
Gardiner, Aileen
RE: Athelstaneford Primary School

Hi Ally,

We continue to miss each other. I phoned on Monday and yesterday. On both days there was a pre-recorded message saying your office was closed for a bank holiday. I've just discovered from your colleague this morning that your outsourced IT had got it wrong yesterday. Nonetheless, nothing was lost as I believe you were not in yesterday anyway. I had previously phoned your office four times, and on one occasion spoke to one of your colleagues, lain Meikie, but he was too busy with a Hearing to discuss the issue.

I'm actually on leave from today until next Thursday, but have come in to tidy up a few lose ends - including this.

## Athelstaneford PS, North Berwick HS and the Proposed East of Mansfield Development

The situation is as follows:

- There are no (not even long term) proposals to close the primary school
- Recent roll projections show that Athelstaneford Primary School's roll is likely to peak around 56, and there should therefore be sufficient spare capacity to accommodate the likely pupils from this development - it is therefore likely that no developer contribution will be required
- The pupil roll projections include developments at the Brae, North of Mansfield, and Camptoun Steading
- Recent roll projections for North Berwick High School show that the school will need to be expanded to accommodate the cumulative impact of several developments in the catchment area, and therefore the proposed development at East of Mansfield will also be required to make a developer contribution towards the school’s expansion - the level of contribution is likely to be approximately $£ 3,000$ per unit

I hope that the above is sufficient for your needs meantime. Only after a Planning Application is lodged will our Education colleagues run a roll projection based on the lodged number and rate of completions.

I'm happy to discuss this on the phone, or to meet with you - but I will not be back in the office until Thursday 10 September.

Kind regards,

Jimmy

Jimmy McGuinnes
PPP Manager
East Lothian Council
tel: 01620827866
e-mai: jmcguinnes@eastlothian.gov.uk

From: Ally Campbell [mailto:Ally.Campbell@montagu-evans.co.uk]
Sent: 11 August 2015 14:57
To: McGuinnes, Jimmy
Subject: RE: Athelstaneford Primary School

Jimmy

I refer to my email below. My apologies for chasing by email, but I seem to keep missing you on the phone.

I was hoping you have had an opportunity to consider my email and queries below. Is it possible to discuss this with you at some point? I am happy to come into your office to meet with you if you think that will be easier. It is short notice, but I am free all day tomorrow if you think you will have a time slot at some point.

Many thanks for your help.

Kind regards

Alexandra Campbell MRTPI
Associate - Planning
Montagu Evans LLP
$4^{\text {th }}$ Floor, Exchange Tower
19 Canning Street
Edinburgh
EH3 8EG

Tel: 01312293800
Fax: 01312292588
Email: ally.campbell@montagu-evans.co.uk
Website: www.montagu-evans.co.uk

## MONTAGU

 EVANSPlease consider the environment before printing this e-mail

## From: Ally Campbell

Sent: 29 July 2015 14:33
To: McGuinnes, Jimmy [jmcguinnes@eastlothian.gov.uk](mailto:jmcguinnes@eastlothian.gov.uk)
Subject: RE: Athelstaneford Primary School

Jimmy

I refer the email thread below. Thank you very much for contacting me earlier in the month. I understand we have both had annual leave commitments in June / July and have not had the opportunity to speak.

I left a message with you earlier today. I will outline my queries below and hopefully we can manage to speak about this.

We act for a landowner in Athelstaneford and are promoting the site for residential development through the Local Development Plan process. The LDP states that the Athelstaneford Primary School has limited capacity. Our clients are surprised by this statement as they consider that the village of Athelstaneford has an ageing and declining population with falling pupil numbers at the Primary School.

We have been in discussion with Paul Zochowski who has helpfully provided us with further information on the pupil forecasts. He has confirmed that the primary school capacity is 75 and that the current forecast is 37 . The pupil numbers are predicted to fall for 2015/2016 and then there is a projected rise to 50 by 2020.

I am keen to understand how these figures are met. I understand that some pupil forecasts are derived from land allocations for residential development within the LDP, and if this is the case, I would be keen to know which sites these are.

If the proposed 50 pupil mark is met by 2020, is this sustainable for the Primary School?

Why does the LDP stipulate that the Primary School has limited capacity when it is currently operating at only half the amount of capacity just now and is not set to rise above 50 pupils from 2020 onwards?

I hope we have the opportunity to discuss this matter soon.

Kind regards

Alexandra Campbell MRTPI
Associate - Planning
Montagu Evans LLP
$4^{\text {th }}$ Floor, Exchange Tower
19 Canning Street
Edinburgh
EH3 8EG

Tel: 01312293800
Fax: 01312292588
Email: ally.campbell@montagu-evans.co.uk
Website: www.montagu-evans.co.uk

## MONTAGU

 EVANSPlease consider the environment before printing this e-mail

From: McGuinnes, Jimmy [mailto:jmcguinnes@eastlothian.gov.uk]
Sent: 12 June 2015 08:37
To: Zochowski, Paul [pzochowski@eastlothian.gov.uk](mailto:pzochowski@eastlothian.gov.uk)
Cc: Ally Campbell [Ally.Campbell@montagu-evans.co.uk](mailto:Ally.Campbell@montagu-evans.co.uk)
Subject: RE: Athelstaneford Primary School

Hi Paul,

Yes, I'll reply to Ally Campbell after reviewing the pupil roll projections and discussing the school situation with Education.

Kind regards,

Jimmy

Jimmy McGuinnes
PPP Manager
East Lothian Council
tel: 01620827866

From: Zochowski, Paul
Sent: 11 June 2015 16:40
To: McGuinnes, Jimmy
Subject: FW: Athelstaneford Primary School

Jimmy

See email below - is this one I could put her in touch with you?

Paul

From: Ally Campbell [mailto: ]
Sent: 10 June 2015 11:55
To: Zochowski, Paul
Subject: RE: Athelstaneford Primary School

Paul

I am just picking up on this matter again, after the concerns about the Primary School have again been raised to me.

It would be helpful for me to understand the Education department's position on this a bit better and I was hoping you could provide me with the name of a contact you have in this department. If I can speak to them, I might be able to understand the school role projections a bit better, so that I can advise my client.

One thing I am interested in knowing is whether or not the Education department are including the allocated site within Athelstaneford within their future projections. It is our understanding that this site is not coming forward for development in the near future and it would be good to know if the Education Department are aware of that.

Thanks for all your help with this so far.

Kind regards

## Alexandra Campbell MRTPI

Associate - Planning
Montagu Evans LLP
$4^{\text {th }}$ Floor, Exchange Tower
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EH3 8EG

Tel: 01312293800
Fax: 01312292588
Email: ally.campbell@montagu-evans.co.uk
Website: www.montagu-evans.co.uk
MONTAGU
EVANS

Please consider the environment before printing this e-mail

From: Zochowski, Paul [mailto:pzochowski@eastlothian.gov.uk]
Sent: 26 February 2015 17:01
To: Ally Campbell
Subject: RE: Athelstaneford Primary School

## Ally

Thanks for your email below.

I have checked with the Council's Education Department who have advised me that although the school roll at the Athelstaneford Primary School is anticipated to fall for the 2015/2016 academic year, it is projected to rise after that to be over 50 by 2020 and remain at over 50 for several years after that.

Kind regards,

Paul

Paul Zochowski
Principal Planner
Policy \& Projects
Housing and Environment
East Lothian Council
John Muir House
Haddington
EH41 3HA
Tel:- 01620827264

From: Ally Campbell [mailto:Ally.Campbell@montagu-evans.co.uk]
Sent: 18 February 2015 16:02
To: Zochowski, Paul
Subject: Athelstaneford Primary School
Paul

I hope you are well.

I am following up on our submission to the East Lothian LDP Main Issues Report with respect to our client's land at Athelstaneford.

Our representations comment on the current capacity at Athelstaneford and the concern regarding the reduction in pupil numbers at the school. I have been advised by my client today that he has been informed that at the end of this school year, there will be 10 pupils leaving the primary school and only 3 pupils are confirmed to be signed up as new pupils. My client is advised that there is a concern within the village that the primary school may have to close due to falling pupil numbers.

I hope this information is useful to you. I would be pleased to discuss.

Kind regards

Alexandra Campbell MRTPI
Associate - Planning
Montagu Evans LLP
$4^{\text {th }}$ Floor, Exchange Tower
19 Canning Street

## MONTAGU EVANS

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**********************************************************************
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## 2.0 : THE CONTEXT



3.0 : THE SITE

3.0: THE SITE

The site is located on the eastern edge of Athelstaneford on the B1343. To the north and east the site is bounded by farmland. To the south the site is contained by the B1343, with a playfield, playground, tennis court and more farmland beyond. To the southwest there is a modern housing development is vacant site which is allocated for housing within the existing LDP.

The site slopes gently down from the B1343 towards the north, allowing for views towards North Berwick, with Berwick Law visible on the horizon. Vehicular and pedestrian access is from the $\mathrm{B}_{134} 8$.
A planning application for 19 houses ( $08 / 00148 / \mathrm{FUL}$ ) was submitted for the vacant site to the north-west in 2008, although a decision was never made on the proposals.


VIEW FROMTHE SITE EAST TOWARDS EAST LINTON

## 4.0 : CONSTRAINTS \& OPPORTUNITIES



## 5.0 : LANDSCAPE



## 6.0 : CONCEPT

The concept aims to take advantage of the
opportunities which define the site:

1. Protect the existing hedgerow along B1343
and the other existing hedges and trees around
the boundary of the site.
2. Reinforce the eastern edge of the village.
3.Create a meandering access lane through
the site with node courtyards around which
dwellings are clustered.
3. Create areas of open space at points along the
length of the access lane.
4. Allowforpossible connection and permeability
through the new site and to adjoining allocated
site.
5. Take advantage of the natural contours and
features of the site to maximise the views out
over the surrounding area
6. Provide positive frontage to new lanes and
courtyards within new neighbourhood


## 7.0 : LAYOUT



## 8.0 : ARCHITECTURE / MATERIALS




## ema

EMA Architecture + Design Limited
Chartered Architects
Chartered Ar
The Stables
38 Baileyfield Road
EDINBURGH EH15 1 NA
01314686595
01314686596
www.ema-architects.co.uk

| From: |  |
| :--- | :--- |
| To: |  |
| Subject: | Local Development Plan |
| Date: | 03 November 2016 17:45:50 |

I wish to object to the scale of development proposed for Gullane and in particular I would request that the greenfield sites of Saltcoats (NK7), Fenton Gait (NK8) and Fenton Gait South (NK9) be removed from the proposed LDP as sites for housing development until such time as all brownfield sites such as the Fire School have been successfully redeveloped.
Gullane has an international reputation as a golfing and tourist destination and care must be taken not to compromise that by drastically enlarging the population. Some increase in housing will be beneficial to the local economy, overdevelopment will not. The primary school capacity, the health care provision, the traffic, parking and state of the roads (which are already beyond the ability of the local authority to maintain) all will be put under unbearable strain.

Shirley Blair

| From: |  |
| :--- | :--- |
| To: |  |
| Subject: | Local Development Plan |
| Date: | 03 November 2016 17:50:59 |

I strongly request that the sites at Saltcoats (NK7), and Fenton Gait East and South (NK8 \& 9) be removed as sites for housing from the proposed Local Development Plan.

Over 200 additional houses is far more than the existing community's 'fair share' of the 10,000 new homes the county is being asked to accomodate. The status of the village as a Conservation Area calls for it to be conserved, not expanded by more than a quarter.

Including Greenfield Sites in the LDP will act as a deterrent to action on the existing Brownfield site; the village does not need another eyesore along the lines of Templar Lodge (now St Andrews Court) which blighted the High Street for years -wating for development to be approved.

The local school, and the local doctors' surgery, are at capacity. As is parking for the village shops, bank and other outlets.

The existing infrastructure is grossly inadequate for this number of commuters. New housing has to be allied to adequate provision of services.

Alan Blair,

```
From:
To:

My name is Mrs Janet Anderson

I request that Saltcoats ( NK7 ) and Fenton Gait East ( NK8 ) and Fenton Gait South (NK9)
all be removed from the proposed development plan ( LDP ) as sites for housing development, and for the following reasons:

The proposed plan is overdevelopment beyond what is reasonable and practical It amounts to \(30 \%\) growth in the village, and all concentrated in the East end of Gullane;

Such overdevelopment would result in severe negative impact on the amenities of local people;

There is no local employment to offer to such an influx of people, thus confirming that buyers of such proposed properties will be largely commuters and will place strain on already strained road and rail services;

Gullane will contribute \(50 \%\) of all new sites from the N Berwick coastal area - this is grossly unbalanced and unfair;

The resulting concentration of traffic on the West Fenton Road would be unacceptable. Fenton Gait East stands to suffer unreasonably and in fact there is much valid concern that the West Fenton Road will be dangerous, noisy and generally unhealthy with traffic fumes;

People living in the proposed new housing will need to travel by car to go anywhere - the village has too many cars already, especially in tourist seasons. There is inadequate parking in ths village as it is;

The Brownfield site at the former Fire Station MUST be developed first. It would be totally unacceptable for this site to be left derelict while greenfield sites are developed - the fact that there is more money to be made out of building on greenfield sites makes this more offensive;

Community, health, school cannot meet the increased demand;
The duration of the development will put an unacceptable strain on local residents living nearby, in particular \(n\) Fenton Gait.

I have objected in writing previously to the Saltcoats and Fenton Gait proposed developments and wish to reiterate these objections in this email.

Thank you.
J anet Anderson
```

From:
T0:

Dear Sir/Madam,
I strongly object to the inclusion of Saltcoats (NK7), Fenton Gait East (NK8) and Fenton Gait South (NK9) in the proposed LDP and request that these sites are removed for the following reasons:

1. The housing would result in a $30 \%$ growth in our village. This would have a detrimental effect in many areas as we do not have the infrastructure in place to allow for this growth.
2. The developments are not sustainable- poor access to employment \& services. They would have a huge detrimental affect on the amenities of the local people.
3. If all 4 sites go ahead, it will contribute to $50 \%$ of all the new sites from the North Berwick coastal area. This is grossly unbalanced.
4. The rural roads are incompatible with such growth putting users at risk. Vulnerable people will no longer be able to use these roads.
5. Public transport \& train station parking is inadequate.
6. Facilities in Gullane are at the opposite end of the village. This will create more traffic throughout the village- more traffic jams- parking violations- increased safety risk to pedestrians \& other car users.
7. If the Greenfield sites go ahead, the Brownfield site may be shelved. Surely it is only right to build on the existing brownfield site first...
8. Facilities in the village would not cope with the increased numbers- Playgroup, Scouts Groups, Village Hall.
9. Daily life of residents will be affected during the development to an unreasonable level. This will, in turn, affect tourism in the village.
10. School \& Medical facilities will be massively which will therefore have a negative impact on the education \& well being of existing (and any new!) residents.

Finally, on a personal note, Gullane is a beautiful village and a wonderful place to raise children \& live. Please don't ruin this.

I have previously lodged objections to the Planning Applications for Saltcoats \& Fenton Gait East.

Yours sincerely,
Emma van der Vijver

```
From:
To:

Dear Sir/Madam,
I strongly object to the inclusion of Saltcoats (NK7), Fenton Gait East (NK8) and Fenton Gait South (NK9) in the proposed LDP and request that these sites are removed for the following reasons:
1. The housing would result in a \(30 \%\) growth in our village. This would have a detrimental effect in many areas as we do not have the infrastructure in place to allow for this growth.
2. The developments are not sustainable- poor access to employment \& services. They would have a huge detrimental affect on the amenities of the local people.
3. If all 4 sites go ahead, it will contribute to \(50 \%\) of all the new sites from the North Berwick coastal area. This is grossly unbalanced.
4. The rural roads are incompatible with such growth putting users at risk. Vulnerable people will no longer be able to use these roads.
5. Public transport \& train station parking is inadequate.
6. Facilities in Gullane are at the opposite end of the village. This will create more traffic throughout the village- more traffic jams- parking violations- increased safety risk to pedestrians \& other car users.
7. If the Greenfield sites go ahead, the Brownfield site may be shelved. Surely it is only right to build on the existing brownfield site first...
8. Facilities in the village would not cope with the increased numbers- Playgroup, Scouts Groups, Village Hall.
9. Daily life of residents will be affected during the development to an unreasonable level. This will, in turn, affect tourism in the village.
10. School \& Medical facilities will be massively which will therefore have a negative impact on the education \& well being of existing (and any new!) residents.

Finally, on a personal note, Gullane is a beautiful village and a wonderful place to raise children \& live. Please don't ruin this.

I have previously lodged objections to the Planning Applications for Saltcoats \& Fenton Gait East.

Yours sincerely,
Mark van der Vijver

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

Sent By Email
3rd November 2016

\section*{Re: proposed Local Development Plan for East Lothian: \\ Reference TT16: Dryden Field, East Saltoun}

To whom it may concern,

We object in the strongest terms to the proposed development of 75 new houses in Dryden Field, East Saltoun, as detailed in the Local Development Plan.

East Saltoun would become a victim of a misguided policy to 'commuterise' East Lothian, with no regard for its character and existing community. The proposal for Dryden Field is inappropriate, impractical, and unmarketable. In the Environment Report approved by Councillors, there are only 3 green scores out of a possible 19 has anyone actually read this report before including Dryden Field in the proposed LDP? We still have no explanation to questions asked of the Council as to why Dryden Field was included in the Local Development Plan when it failed most of the selection criteria.

Our key objections are based on the following material considerations:
- Visual appearance of the proposed development and its relationship to its surroundings - massing and density are not appropriate
- Impact on setting of listed buildings or conservation area - development contravenes the plan's own Character Statement for the village
- Provision of suitable access and transportation - public transport not adequate, and East Saltoun does not benefit from proposed improvements to rail and road networks
- Suitability of the site for development purposes - infrastructure inadequate in terms of education, medical and community facilities
- Deliverability - this site is not marketable to potential homebuyers or renters
- Environmental impacts - loss of prime 3.1 graded agricultural land (contrary to Scottish Planning Policy), compounded by an increase in carbon emissions from a doubling of road traffic, and light pollution from street lighting.

In more detail, our objections are:
- Visual appearance of the proposed development and its relationship to its surroundings - particularly in relation to massing and density. The housing density of 75 new houses is not appropriate to a rural village of this size, and would increase the size of the village by \(70 \%\). Furthermore, how is it that one of the most remote sites included in the LDP is expected to support the largest development relative to its size? This makes even less sense when one considers that Dryden Field is the most elevated and exposed site in the LDP, being both open to the elements, and visible for many miles around from all points of the compass.

\section*{- Impact on setting of listed buildings or conservation area}

East Saltoun is a Conservation Area (one of only 30 in East Lothian, and one of only two conservation areas earmarked for development in the Tranent cluster). A development of 75 houses would not comply with East Saltoun's 'Conservation Area Character Statement', which states :'Some of the most recent new housing is of a much larger scale than previous housing and any future infill development should be more in keeping with the size of the vernacular houses of the village.' A
development of 75 new houses - with two-storey buildings included in the plancould not hope to be in keeping with the size of the vernacular houses of the village, and would entirely change its 'character and interest', when viewed from any approach or from within the village itself. The Council's Environment Report even states: 'the size of the site relative to the existing village is such that development may have significant impacts on the character of the village and on its Conservation Area '.

\section*{- Provision of suitable access and transportation (including road safety, amount of traffic generated)}

East Saltoun is outwith the proposed zones improving the rail and road traffic routes to East Lothian (the 'Rail Network Contribution Zones' and 'Active Travel Corridor Zones'),- so would not benefit. Public transport is currently sporadic and most people living here use cars. An increase of a possible 100-150 cars coming in and out of the village would be unfeasible with the size of the current roads, and would make road safety even more of a concern than it currently is (there are accident hot spots at Spilmersford Bridge and crossroads at bottom of hill near Saltoun Home Farm). We also have large logger lorries coming through the village on the way to Petersmuir sawmill - adding to the road safety problems, road traffic density and carbon emissions. The Council's Environment Report states:
'Its development would not align well with strategic and local policy objectives including meeting housing need in the most sustainable locations that minimise the need to travel.'

Suitability of the site for development purposes. The site is unsuitable for development because of related impacts including:
- education - The report says that Saltoun Primary school has 'sufficient capacity' for 75 new homes. However, the Environment Report says: 'The site is within the East Saltoun Primary School catchment which has very limited capacity and cannot expand.' The capacity of the school is 85 including nursery. The current school roll is 58 including nursery. Even with a mooted development of the Fletcher Hall to accommodate the school in some way, there would not be enough space for what could be an influx of \(50+\) children. Also the LDP is very sketchy on developing the capacity at Ross High School, the catchment secondary; how would it cope with the massive influx from the developments at Tranent, Macmerry, Gladsmuir, Pencaitland and Ormiston?

\section*{- community facilities}

There is currently no shop in the village. The nearest GP surgeries in Ormiston and Haddington will be vastly overstretched already by the planned developments. There is no mains gas supply to the village and both broadband speed and mobile phone coverage is well below an acceptable level. East Saltoun's septic tank only has 'limited capacity', according to the Environment Report.

\section*{Deliverability of proposed development}

A proposal of 75 new homes in a relatively remote, rural village which is not wellserved for community facilities, has narrow winding country roads in all approaches, and has little public transport, is virtually unmarketable. 75 new houses amounts to a housing scheme, no matter how well it is designed: people who want to live in a housing scheme tend to want good local amenities, high-speed broadband and good transport links. It already takes 6-12 months to sell a property in East Saltoun because of its position. There would be no market for this development. The same would apply to houses available to rent, or, even worse, holiday homes which are included in the proposals. This development would leave empty properties which fail to sell, as we have seen in another local development at Bolton.

The LDP is the result of an ill-conceived strategy by the Council in which landowners were invited to offer up sites, to fill a demand for homes for people outwith the County. The resulting 'plan' is a random assembly of sites offered up by landowners, who, particularly in East Saltoun's case, are driven by money. East Lothian Council should be above this, and it shows a startling lack of imagination. This is not planning, it is panic. East Saltoun should not be changed forever for the lack of coherent planning strategy for East Lothian's rural villages, especially when there are more appropriate sites in other areas of the County.

Yours faithfully
Rebecca Salt and Michael Simpson
```

From:
To:

Dear Sir/Madam

I am writing to express very serious and strong objections to the Development Plan including:-

## SALTCOATS EAST FENTON GAIT EAST (NK8) FENTON GAIT SOUTH (NK9)

1) There is a clear government Policy that the development of Brownfield Sites should take precedence over that of Greenfield Sites.

If this policy is to have any credibility, the site of the former Fire Station and School in Gullane should be developed first, (as indeed
should the Blindwells site at the West end of East Lothian).
It is obviously more costly to clear Brownfield Sites first and less attractive to some prospective purchasers and therefore to developers.

However, it is up to responsible authorities to offer support, tax allowances, etc, as most appropriate to implement this policy.
2) The overall scale of the proposed developments raises very big questions - there is little or no evidence that these have been considered
with the seriousness they most definitely require:-
a) It is best practice with developments that issues should be decided in the following order:-
i) employment available or planned or possible locally
ii) infra-structure, amenities, community provision
iii) housing

How far has the Plan taken into account i) above?
The weaker the response to this question, the greater the pressure on transport rail, roads, buses, cars.

How far has the Plan taken into account ii) above?
At the very least the response on these questions is so important that far the best strategy should be to develop the brownfield sites
and very carefully monitor the implications for transport and infra-structure with particular respect to the following (and no doubt many others):-
b) Transport: Rail: Trains to Edinburgh are already so crowded in the mornings that passengers may be unable to get on at Wallyford;

The car parks are full during the week by about 7.30am. This last Monday I noticed that in Longniddry at 7.30am there were
two vehicles on double yellow lines on the slip road coming down from the station car park, and later in the morning cars
were parked all the way down on the left on the A198 leading north from the station for some 300 yards. It would not take
much more traffic and demand for car park space to lead to very dangerous situations on the road and intolerable pressure
on space to park - and then keep traffic moving.
Roads: with all the developments proposed near the A198 overall pressure is likely to lead to extremes of congestion - it is already extremely difficult to get in and out of North Berwick at times during the summer.

The Fentoun Gait South (NK9) development: this would almost inevitably lead to use of the roads through West Fenton Farm
which are very narrow and twisty and not suitable for commuter use; they are currently used by horses, a nuber of young people cycling to and from the farm from Gullane - incidentally, West Fenton also has a large Riding Therapy (Riding for the Disabled) facility in use at least three days a week. Excessive developments and consequent traffic would run the grave danger of reducing the safety and access
of current users - don't forget both the need for horse-boxes and farms vehicles - have you given any thought to what it might be like during harvest?!
Bus services are extremely important - and it would of course help all of us if they were more fully used - danger of journey times being even longer.
c) Amenities: to increase the population of Gullane by some $38 \%$ in such a short time carries implications for local traffic movements, parking, shops, schools, health care resources, community facilities - halls, centres.
I believe these are so enormous that I would again urge in the strongest possible terms that these should be very carefully monitored following the development of the old Fire Station site before any commitment is given to develop all the proposed sites: the scale, this the risks of
totally inadequate provision and, further very great loss of quality of life both for all residents and the many tourists who really love these coastal
towns and villages as they are - but could be turned away in large numbers of freedom to move and enjoy life are markedly impaired.

Careful thought and action, please

Yours faithfully

Barry Morrison

| From: |  |
| :---: | :---: |
| To: | Local Development Plan |
| Cc: | Policy \& Projects; - |
| Subject: | ELC Proposed LDP - Representations related to Tranent East and PROP TT1 Housing at Windygoul South, Tranent on behalf of Messrs R and A Kennedy and Omnivale Limited |
| Date: | 04 November 2016 08:20:37 |
| Attachments: | ELC LDP Tranent East Submission Text 11-16.pdf |
|  | Tranent East - Site Location Plan.pdf |
|  | Document 1 - Indicative Development Proposal - EMA.pdf |
|  | Document 2 - Tranent Eastern Expansion Transport Appraisal Final - WSP.pdf |

Please find attached a representation on behalf of Messrs R and A Kennedy, Seggarsdean Farm, Haddington, EH41 4LD and Omnivale Limited, Rowland Hall, Newsholme, Howden, DD14 7JU related land at Tranent East and PROP TT1
Housing at Windygoul South, Tranent. This representation comprises a statement outlining the changes sought to the Proposed LDP along with the reasoning for seeking changes, a site location plan (Tranent East site) and 3 documents as follows: -

Document 1 - Indicative Development Proposal - EMA Architects
Document 2 - Transport Appraisal - WSP
Document 3 - Site Effectiveness Assessment.

## Grateful if you could confirm receipt.

Kind Regards

Malcolm Smith
Director
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# EAST LOTHIAN COUNCIL PROPOSED LOCAL DEVELOPMENT PLAN 

## REPRESENTATION ON BEHALF OF MESSRS R AND A KENNEDY AND OMNIVALE LIMITED

## Changes to Local Development Plan sought:

- PROP TT1 "Housing at Windygoul South, Tranent" should be deleted from the Proposed Local Development Plan
- Land at Tranent East (refer attached site plan) should be allocated for development of up to 850 residential units with associated uses (primary school, community facilities/uses, public park/open space, and related infrastructure).


## SUPPORTING CASE

### 1.0 BACKGROUND

1.1 In order to comply with the requirements set out in NPF3, Scottish Planning Policy, and SESplan it is essential that the East Lothian Local Development Plan (LDP) provides for the delivery of sustainable development in accessible locations. Key to the delivery of the LDP development strategy will be promoting a range of new housing development throughout the area with the concentration of new development in the most accessible parts of the district. The Compact Growth Strategy set out in the LDP appears a reasoned response to the identified delivery needs by directing the majority of new development to sites in/around the main settlements within the west of the SESplan East Lothian Strategic Development Area (focussed on the A1 and East Coast Main Line), that closest to the origin of demand.
1.2 Blindwells appears as a key component of the emerging preferred strategy (as it has been over an extended period) but can only be relied on, no matter the scale of development supported at this location, for a small percentage of the new house completions required by SESplan in the LDP area during the plan period. The SESplan housing requirement for East Lothian equates with the need to identify land capable of delivering 10,050 homes in the period up to 2024, with an interim requirement of land capable of delivering 6,250 homes up to 2019 and thereafter, the residual requirement of 3800 units. A five year effective housing land supply is also to be maintained at all times. The Plan, as presently proposed, despite the terms of Table HOU2, will fail to meet all of these targets (refer representation from Homes for Scotland) and there remains an underlying requirement for a pragmatic response to release additional effective sites in order to help meet the level/range of needs identified.
1.3 The focus of new housing allocations, in order to accord with Scottish Planning Policy and SESplan, are those which are capable of being delivered (or part thereof) within the LDP period. Allocations on land without the commitment of the landowner to release the land for development are largely pointless and add nothing to the delivery of the development strategy.

### 2.0 THE TRANENT CLUSTER

2.1 The Tranent Cluster is centred around Tranent, the second largest town in East Lothian with a population of circa 11,565 persons. The defined area includes Tranent and a range of other settlements including Macmerry, Ormiston, Elphinstone, and Pencaitland, among others. Tranent contains a range of commercial, educational and leisure facilities commensurate with its scale/function.
2.2 LDP paragraph 2.82 confirms that: -
"In this cluster Tranent and Macmerry are the main settlements ... and highly accessible part of the Strategic Development Area, including via public transport. Sites identified for development in this area by the Plan will deliver the compact spatial strategy. The settlements of Ormiston, Elphinstone, Pencaitland, New Winton, East and West Saltoun and Humbie are all outwith the SDA."
2.3 In accordance with the SESplan SDA requirements it is therefore Tranent and Macmerry that should be the focus of new residential development in order to meet the SESplan targets with some smaller scale localised development in the non-SDA settlements to assist in the variety/choice of new sites. Despite the SESplan policy requirement to focus new development within the SDA, over 500 units in the Tranent Cluster ( $33 \%$ of the required allocation) are proposed to be allocated for settlements outwith the SDA and there is no assessment set out within the emerging LDP to justify this approach/position. Logically, with a clear strategic concentration on Tranent and Macmerry to meet the SESplan requirement, then the potential for development in these areas should be prioritised. The need for a generous land supply in order to assist housing delivery should also be factored into the level of allocations being made through the LDP.

### 3.0 FUTURE DEVELOPMENT IN TRANENT - WHERE?

3.1 The LDP promotes development for 1500 houses within the Tranent Cluster during the LDP period. In promoting this level of development, the LDP also recognises constraints on further development in the town in the form of education capacity, air quality in the High Street (which is presently designated an Air Quality Management Area), and junction capacity on the adjacent A1 arterial road.
3.2 LDP PROP ED4 "Tranent Cluster Education Proposals" confirms proposals for a phased extension to Ross High and additional pre-school and primary provision at Windygoul Primary School (in order to serve the additional new homes being planned for within the catchment). Policy T26 supports a programme of transport improvements in Tranent Town Centre with PROP 27 promoting the management of traffic in the town centre via a one-way system in order to improve traffic flow and maintain air quality. It is unclear how practical/deliverable this one-way system would be (capacity/impact on existing roads and junctions), whether this will have negative impacts on the trading of High Street businesses, and if it would simply lead to additional trip lengths and therefore little, if any, tangible improvements in air quality. It may also lead to less sustainable travel patterns. The LDP also promotes (PROP T17) improvements at the A1 Bankton Junction as part of a wider upgrade to the trunk road network.
3.3 The potential for the release of land at East Tranent for development has been promoted/considered throughout the LDP process. At the MIR stage the landowners, R and A Kennedy and Omnivale Limited, formally combined to promote their respective sites, this forming the basis of this current submission. The sites had been put forward as part of the "call for sites" stage of the LDP and were considered as "reasonable alternatives" at the MIR stage - site references ALT-T5 and ALT-T7.
3.4 In addition to circa 850 homes, the East Tranent development makes provision for a new primary school, an eastern town centre by-pass, open space and playing fields, land for community facilities, structural landscaping, and related infrastructure.
3.4 Within the MIR document the Council stated that "if there is any significant housing/employment growth to the East of Tranent, there would need to be a comprehensive and co-ordinated masterplan for such an expansion. A clear approach to the most effective transport solution would also be required". The site promoters' response to these issues was contained in an Indicative Development Proposal (Document 1) and a Transport Appraisal (Document 2) submitted with their MIR submissions. These documents remain relevant to this Proposed LDP submission and are attached in support of this submission.
3.5 A fundamental benefit of the East Tranent development is the delivery of a road through the development linking from the Bankton A1 junction in the north to the B6371 Ormiston Road to the south. This route would facilitate a significant number of local traffic movements to and from the A1 corridor without the need to pass through Tranent High Street and the designated Air Quality Management Area, and would, in conjunction with Waterloo Road/Castle Road linking to the B6414 Elphinstone Road, provide both a southern and eastern by-pass for High Street, Tranent.
3.6 While the eastern development option would help to address current transport and air quality issues in Tranent, this is not the case for the proposed PROP TT1 allocation at Windygoul. This development would simply add to the additional traffic in

Tranent, including that passing Windygoul Primary School and through central Tranent, without providing any mitigation or other transport benefits to the town. The inability of the developer to link through to the B6414 Elphinstone Road would be likely to lead to additional traffic movements from the site directly through the town centre thereby further exacerbating air quality issues. It is unclear if the LDP proposals for a one-way system (PROP 27) in central Tranent, should it be deliverable/desirable in the first instance, would be sufficient to off-set impacts from the Windygoul development albeit this potentially disruptive one-way system would not be required where the eastern development option was favoured facilitating the eastern and southern by-pass of Tranent town centre.
3.7 It is also noted that the PROP TT1 allocation at Windygoul lies directly adjacent to an established industrial area. It is unclear what future impact the proposed residential development at Windygoul may have on the ability of employment uses to operate/expand. Employment uses should have a reasonable expectation that their operations will not be adversely impacted/constrained by non-compatible development on neighbouring sites, particularly where there are better alternative development sites readily available to meet identified housing requirements, as in this case. It is unclear what land use compatibility assessment has occurred (as it is not addressed in the draft development brief for the site) and it is certainly not in the interests of either the employment use or future residents to have such a close physical relationship.
3.8 The East Tranent proposals represent an appropriate scale/form of deliverable development in support of the SESplan and LDP strategies. Providing circa 850 units in total, in addition to provision for a school site and new Primary School in conjunction with East Lothian Council, a town centre By-pass, public open space, structural landscaping, and an array of linkages to Tranent (well integrated), this is considered to represent an appropriate forward planning approach in order to address the identified development issues around the town in addition to contributing positively to the delivery of new beneficial and sustainable development in a preferred location. It is considered that with respect to the East Tranent proposals: -

- Education solutions, both primary and secondary, can be delivered as an integral part of the proposal;
- The new road structure, including access to the A1(T) Bankton Junction and the provision of a through road, would assist traffic movements in/through/around Tranent while directly assisting existing air quality issues in the High Street;
- Contribute towards the proposed upgrading of the A1(T) Bankton Junction; and
- The sites are deliverable (Document 3 refers)


### 5.0 CONCLUSIONS

5.1 The proposed allocation of the subject sites at East Tranent for residential and related development represents a logical and deliverable development option within Tranent. Not only are these sites closer to the town centre than the preferred site at Windygoul (PROP TT1), development at East Tranent is the only option that provides direct transportation and air quality benefits to the town centre as a result of the eastern and southern By-pass of the High Street that would be delivered. The transport impact appraisal (Document 2) has demonstrated that development at Tranent East (Document 1 refers) is very well located to maximise opportunities for more sustainable travel while minimising the potential impacts on the existing constrained local and strategic road network, especially along Tranent High Street. The proposal also makes full provision to address education issues arising from the development and would contribute to the upgrading of the A1(T) Bankton Junction; all of which accords with the stated requirements in the emerging LDP.
5.2 The Tranent East sites are located in the preferred strategic location and the proposed development can be fully integrated with, and contribute positively to, Tranent. The sites are being actively promoted and presently have developer interest. The Council/Reporter can therefore be confident that the allocation of these sites for residential development would be fully effective and contribute positively to meeting strategic and local requirements.
5.3 There is no clear or justified basis set out in the emerging LDP, or in any supporting documents, indicating why the Windygoul site (PROP TT1) is considered that best served to meet either strategic policy/objectives or the specific needs of Tranent. The site is further from the High Street, it is bounded (in part) by industrial uses, and the traffic to/from the site will add to road capacity and air quality problems identified in central Tranent. Re-directing the focus of new residential development to Tranent East will also remove the need for the school extension (a new Primary School being provided to the east as part of that development).
5.4 For all of the reason set out above, the deletion of site PROP TT1 Windygoul and the addition of the identified sites at Tranent East is considered fully justified with respect to the strategic and local objectives arising from the emerging LDP.

## DOCUMENTS

## Site Plan

## Document 1 - Indicative Development Proposal - EMA Architects

## Document 2 - Transport Appraisal - WSP

Document 3 - Site Effectiveness Assessment





## 2.0 :THE CONTEXT


2.0: THE CONTEXT

The town of Tranent is located within East Lothian along the A1 corridor. It is well placed to take advantage of the surrounding road network and a short distance from the railway station at Prestonpans. The train provides good access into Edinburgh ( 15 mins) and to North Berwick and Dunbar in
the east.

There is a good range of local amenities within the town centre such as local shops, community buildings, cafes and pubs. The area is served by two primary schools at Sandersons Wynd and Windygoul and by Ross High ,
Housing within the area generally comprises of traditional two storey dwellings. There are also a number of 3 storey flats within the town. stone and tiled roofs.


## 3.0 : THE SITE



## 4.0 : CONSTRAINTS \& OPPORTUNITIES

## The site is constrained by important features along each

 of its edges.The $A_{1}$ road and landscape corridor constrains the evelopment site opportunity for access into the site.

To the west the site is contained by the fences and rear boundaries of existing residential development which define the edge of Tranent.
The eastern boundary is open countryside and agricultural and. The southernmost part of the eastern edge (between the A199 and the B6355) is
landscaping and an access track
There are a number of opportunities to improve the edge here are a number of opportunities to improve the edge
of the settlement in the east and the existing surrounding footpath network. There are also opportunities to improve ootpath network. Thereare also opportunitiesto improve factor, which the development of the site can deliver, is relief road around the eastern side of the town which will help alleviate the existing pollution and congestion
concerns within the centre.
here are also opportunities to take advantage of the views from within the site
he Forth and Bass Rock.


## 5.0 : CONCEPT

```
The concept aims to take advantage of the
opportunities which define the site
1. Reinforce the existing eastern edge of Tranent
2. Provide new relief road avoiding air quality
and congestion issues within town centre
3. Create areas of interest and open space along
new primary route
4. Maximise connection and permeability
residential neighbourhoods
5. Provide new primary school sit
6. Take advantage of the natural contours and
eatures of the site to maximise the views out
over the surrounding area
7. Provide positive frontage to new lanes and
8. Provide much needed family housing within
```




## 6.0 : LAYOUT




## 8.0 : ARCHITECTURE / MATERIALS



## 9.0 : CONCLUSION

This site represents an excellent opportunity to provide much
needed family housing within an area already suited to this type of development.
As demonstrated throughout the document the character of ranent would be preserved and the edge of settlement to the east would be enhanced.

The development would also provide the opportunity to mprove the existing footpath and cycle network and increase onnectivity throughout the town
Existing views to and from the existing settlement of Tranent would be preserved and enhanced.
The new neighbourhoods, in conjunction with surrounding developments, would play an important part in reinforcing the ettlement boundary and providing Tranent and East Lothian with a long term sustainable solution to providing new housing
development.

## ema

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# Tranent Eastern Expansion Development Sites East Lothian Council Main Issues Report Response Transport Appraisal 

## Introduction

WSP have been commissioned by Omnivale Limited and $R$ and $A$ Kennedy to undertake an appraisal of the transportation considerations related to the proposed Tranent Eastern Expansion. This has been commissioned in order to address a number of the points raised by East Lothian Council (ELC) in their Main Issue Report (MIR) prepared in advance of the new Local Development Plan.

This Transport Appraisal is comprised of the following sections:

- Proposed Tranent Eastern Expansion Development Sites
- Key Issues
- Opportunities
- Development Strategy
- Summary and Conclusions


## Proposed Tranent Eastern Expansion Development Sites

The Tranent Eastern Expansion is comprised of adjoining development sites under two different land ownerships which have been included as 'reasonable alternative' development opportunities within the ELC's MIR document. The development sites under consideration in this Transport Appraisal are shown in Figure 1 and as follows:

- ALT-T5 - Tranent East, owned by Messrs R \& A Kennedy
- ALT-T7 - Tranent Mains, owned by Omnivale Limited

Figure 1: Potential Tranent LDP Sites Presented in MIR


It is proposed that the Tranent Eastern Expansion would be able to deliver approximately 800-850 units, including making available land to accommodate a new primary school.

## Key Issues

This section sets out the key issues which all new development sites located within the Tranent area will need to consider to ensure that they are suitable to be taken forward for inclusion in the new LDP.

## Tranent High Street

Tranent High Street is the main thoroughfare through the centre of Tranent and leads onto Edinburgh Road and Church Street. Edinburgh Road continues west towards the Dolphingstone A1 (T) interchange. Church Street continues north towards the Bankton A1 (T) interchange.

There are currently a number of serious issues regarding Tranent High Street which stem from the congestion on this road. The high street is heavily congested throughout the day, with vehicles parking at the sides of the high street to gain access to the shops and services along this road. The high levels of through traffic on Tranent High Street and parking issues have impacted on local services and the air quality in the town centre is now below an acceptable standard.

It is acknowledged that any new development site proposed for the Tranent area would need to ensure that it does not route a significant volume of strategic traffic (i.e. trips to destinations outwith Tranent) through Tranent town centre.

Within ELC's MIR document, they identify the Windygoul South site as the preferred land release location for Tranent. The Windygoul South site is shown as 'PREF-T4' in Figure 1. However, due to
the location of the Windygoul South site to the south of the existing settlement area of Tranent a significant proportion of the vehicle trips generated by the proposed development would be routed through Tranent High Street to access the Dolphingstone and Bankton A1 (T) interchanges. This development impact would further exacerbate the existing issues on Tranent High Street as it would appear that the site can only be accessed from B6371 Ormiston Road.

## Bankton A1 (T) Interchange

The Bankton A1 (T) Interchange is located to the north of Tranent and to the north of the proposed development sites and provides direct access from Tranent onto the A1 (T).

As part of the MIR, a Transport Appraisal assessing the transport implications in support of the emerging East Lothian Local Development Plan was commissioned by ELC and undertaken by Systra. To determine the potential level of impact at the Bankton A1 (T) Interchange resulting from the development of the Tranent Eastern Expansion sites the ELC / Systra report has been reviewed.

The modelling work was undertaken using the SEStran Regional Transport Model (SRM). The SRM is designed to represent strategic traffic movements within the SEStran area. To support the model, traffic counts were obtained from Automatic Traffic Counts, the Scottish Roads Traffic Database and Midlothian Council strategic counts. The model occupiers of the proposed residential developments are assumed to come from outside of the East Lothian area (to represent a worst case scenario) and employment patterns are assumed to be unchanged. The modelling forecasts look at the predicted impact of the additional households on the road network in terms of junction delays, queue lengths and journey times. The AM peak is analysed for the entirety of the report except for journey times. AM westbound and PM eastbound journey times are analysed as the majority of employment is located towards the west. This causes congestion on the westbound carriageways in the AM and the eastbound carriageways in the PM. The relevant tests that have been presented in the Transport Appraisal are shown Table 1.

Table 1: MIR Transport Appraisal Key Test Scenarios

| Test | Description | Blindwells <br> (Committed) | Blindwells <br> 1 | Blindwells <br> 2 | Tranent <br> East | Goshen | Longniddry | Other <br> Sites | Total <br> Units |
| :--- | :--- | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 2 | 2024 <br> Reference <br> Case | 1,600 |  |  |  |  |  | 5,000 | 6,600 |
| 12 | Prefered <br> BW1 I <br> Tranent <br>  <br> Longniddry | 1,600 | 6,000 |  | 600 | 1,000 | 1,000 | 14,000 | 24,200 |

In order to determine the full potential effects of the Tranent Eastern Expansion on the Bankton A1 (T) Interchange, modelling scenario Test 12 which includes the majority of the MIR development sites, including 'Tranent East' ( 600 units) has been compared against the 2024 Reference Case (Test 2). The results of this assessment are shown in Figure 2.

The model output results for Test12 compared to Test 2 (2024 Reference Case) are shown in Figure 2.

Figure 2: Test 12 vs Test 2 Junction Delay Results - Bankton A1 (T) Interchange


Figure Source: ELC / Systra
ELC's Transport Appraisal considers the impact of the development sites included in Test 12 on average vehicle delay at the Bankton A1 (T) Interchange is predicted to be minor with increases in vehicle delay compared to Test 2. Increased vehicle queuing on any junction approach arm is predicted to be less than 2.5 Passenger Car Units (PCUs). Whilst further testing of development
impact will be required, it is envisaged that a further 200-250 units at Tranent East could be accommodated on the existing transport network.

The assessment does however, indicate that there would be significant increase in congestion within Tranent Town Centre, linked to the potential new development at Windygoul South in Tranent.

Opportunities to address the above issues and improve existing conditions are presented in the section below.

## Blindwells

The Blindwells development is located to the north-east of Tranent and on the north side of the A1 $(T)$. The development of 1,600 units is currently committed at Blindwells and further development of up to 6,000 units is currently under consideration in the MIR.

The results of the traffic impact test presented in Figure 2 include the maximum addition development capacity proposed for Blindwells (6,000 units). The results indicate that at the Bankton A1 (T) Interchange there would only minor additional delay with the addition of the Tranent East and Blindwells developments.

## A1 / A720 Old Craighall Roundabout

The A1 / A720 Old Craighall Roundabout is the main interchange junction for traffic routing between the A1 and A720 The City of Edinburgh Bypass. The major employment opportunities in the Lothian region are located within and around Edinburgh. As ELC have focussed future development along the A1 corridor, irrespective of the development site's specific location, it is predicted that the majority of vehicle trips during the weekday AM and PM periods will be routed through the A1 / A720 Old Craighall Roundabout.

ELC have acknowledged that the trunk road and local road network capacity is already an acute problem at the Old Craighall Junction and that Transport Scotland is of the view that these capacity constraints alone will restrict any further development from being delivered in the East Lothian area until solutions are found and are committed to be put in place. Transport Scotland has indicated that all improvements to the trunk road must be secured and that no development should commence until such time as an agreed funding mechanism or full funding is in place for as yet to be fully designed and costed projects.

ELC have identified a number of potential measures to improve the operation of the A1 / A720 Old Craighall Roundabout including:

1. Introducing a bypass lane between the A720 and the A1 Westbound merge and from the diverge to A720. It is expected that these measures would reduce the amount of traffic on the roundabout and increase capacity.
2. Signalisation of the junction, with the approaches signalised to control how traffic from each arm is fed onto the circulatory section of the junction. This could be combined with queue optimisation methods such as MOVA1 and queue detectors.
3. Improvements elsewhere on the A720 corridor to reduce the traffic impacts at the A1 / A720 Old Craighall Roundabout.

Within the Transport Appraisal report ELC have identified the need for them to undertake further studies in conjunction with Transport Scotland to determine the most suitable infrastructure improvements.

As all the potential Local Development Plan sites would impact on the operation of the A1 / A720 Old Craighall Roundabout it is expected that ELC will derive and implement a development contribution mechanism to help fund any improvement works. Any contribution related to the Tranent Eastern

Expansion developments should be proportionate to the scale of development and the potential level of impact compared to the other candidate sites for inclusion in the upcoming Local Development Plan.

## Opportunities

This section presents proposals which could be implemented as part of the Tranent Eastern Expansion to address the existing transport-related issues for Tranent

## Tranent Eastern Relief Road

As presented in the section above the existing and projected future conditions within Tranent town centre are considered to be below acceptable air quality standards related to the high volume of traffic routed along the High Street as well as parking enforcement issues. To address this key issue, it is proposed for the Tranent Eastern Expansion to include provision of a new relief road to the east of the existing settlement boundary.

It is expected that this new relief road will allow those coming from the east on the A199 or from the south of Tranent accessing the A1 to circumvent the B6371 and High Street, alleviating congestion issues created by the volume of through traffic. This proposed relief road will create an alternative thoroughfare allowing for a more manageable dispersion of vehicles on the road network surrounding Tranent town centre and its residential areas.

The proposed relief road will not be a bypass and will aim to connect well to the existing road network within Tranent, with several links through to neighbouring residential areas to the east of the town. By adding links through to the adjoining residential areas, walking and cycling is encouraged and new routes to key local facilities such as schools and town centre shopping are facilitated. This new road network will open up development to the east of Tranent by linking into the existing road network and facilitating easy access to the parcels of potential development land to the east which are currently isolated.

The indicative routing and connections for the proposed relief road are present in Figure 3.

Figure 3: Indicative Tranent East Relief Road Routing


## Blindwells Integration

The Key Issues section above has included a summary of the predicted impact of the Tranent Eastern Expansion and potential future Blindwells development. It is noted that as part of the Blindwells development master plan there is a proposal to introduce a new interchange onto the A1 (T) to relieve traffic conditions at the Bankton $\mathrm{A} 1(\mathrm{~T})$ Interchange. It is considered that the Tranent Eastern Expansion site is best placed to deliver a connection from Tranent to this potential interchange.

## Strategy

This section sets out the optimal development strategy for the future expansion of Tranent.

## Tranent Eastern Expansion

The internal road network will be designed in accordance with Designing Streets to allow traffic to be dispersed effectively and allow for the adoption of a flexible phasing strategy. The application of Designing Streets is also intended to encourage vehicles to travel at an appropriate speed throughout the development. This will be achieved through the adoption of appropriate design standards based on the primary function of the street and will include a reduction in forward visibility at junctions to achieve vehicle speeds of less than 20 mph to create environments which are attractive to pedestrians and cyclists. Residential streets can provide areas of public realm to provide an environment which is attractive to pedestrians and cyclists by reducing vehicle speeds. There is the potential to form courtyards or squares to create distinctive environments which encourage pedestrian movement in addition to accommodating vehicle usage.

As discussed above, a new relief road can be delivered as part of the Tranent Eastern Expansion to ensure that strategic development traffic is not routed through Tranent High Street. This will also
increase dispersal of existing traffic within Tranent and alleviate the current air quality and congestion issues.

The proposed development strategy will also facilitate the movement of bus services thereby maximising potential accessibility to public transport within eastern Tranent.

## Windygoul South

As indicated above the Windygoul South site would add 550 homes to the southern Tranent area. However, it would appear that the development can only be accessed from the B6371 Ormiston Road therefore limiting development to 300 units. Furthermore, Designing Streets Policy encourages better connectivity and integration through multiple accesses which Windygoul South cannot achieve based on a single access.

The majority of the strategic development traffic from this site would result in significant increases in congestion along Tranent High Street and would be detrimental to the air quality conditions. This development would not be able to come forward until measures are implemented to relive traffic from Tranent town centre.

ELC acknowledge the potential additional impacts of Windygoul South development may necessitate the construction of a new 'Tranent Bypass' which would link the south of Tranent to the Dolphingstone A1 ( T ) interchange. The routing of this bypass is presented in Figure 4.
Figure 4: Indicative Tranent Bypass Routing Presented in ELC's MIR Transport Appraisal


Figure Source: ELC / Systra
The ability of the Windygoul South site to deliver the 'Tranent Bypass' is not considered within the main MIR report. However, aside from the significant capital costs required, it is expected that it
would take a significant time period to satisfy the potential land ownership and design constraints to deliver.

It is therefore not expected that development to the south of Tranent, including at the Windygoul South site can be taken forward within the LDP timescales without resulting in significant increase in traffic along Tranent High Street.

## Public Transport

The Tranent Eastern Expansion relief road would allow for the local bus services to run on a loop from the Bankton Interchange, along the B6371 and High Street before travelling along the new relief road and back to the Bankton Interchange. By allowing services to run on a loop around a large residential area a greater number of passengers can access onto public transport. The fact a larger area and increased number of people can use this bus route may also limit the number of private vehicle movements that run through Tranent and its residential streets, which will have a positive impact on air quality.

## Blindwells

As demonstrated above, the proposed Tranent Eastern Expansion can be delivered in conjunction with the proposed maximum capacity Blindwells development.

Proposals for a new interchange onto the $\mathrm{A} 1(\mathrm{~T})$, to serve the Blindwells site is expected to also provide the opportunity to create a new link onto the A1 (T) serving Tranent. This interchange will also provide the opportunity to create an additional connection between Tranent and Blindwells which will support shared facilities between the two settlements and provide additional options for the routing of public transport services.

## Summary and Conclusions

WSP have been commissioned by Omnivale Limited and R and A Kennedy to produce a transport appraisal assessing the potential traffic impacts of the proposed Tranent Eastern Expansion, on the local and strategic road network. It is expected that the proposals ( $800-850$ units) for this link road will also provide major benefits to all road users in Tranent and surrounding villages to the south.

The Tranent Eastern Expansion is comprised of adjoining development sites under two different land ownerships which have been included as 'reasonable alternative' development opportunities within the ELC's MIR document with capacity of $800-850$ units. The development will incorporate 'Designing Streets' principles to ensure that travel by the most sustainable modes is maximised with measures put in place to reduce the necessity for private car trips.

Tranent High Street is currently congested and therefore the town's air quality is below an acceptable standard. It is therefore acknowledged that any new development site proposed for the Tranent area would need to ensure that it does not route a significant volume of strategic traffic along High Street.

It is expected that the Windygoul South proposed development would route a significant amount of traffic through Tranent High Street, which is likely to trigger the delivery of the 'Tranent Bypass'. However, it would appear that the development can only be accessed from the B6371 Ormiston Road therefore limiting development to 300 units. Furthermore, Designing Streets Policy encourages better connectivity and integration through multiple accesses which Windygoul South cannot achieve based on a single access.

This proposal would be difficult to implement without resulting in a significant increase in traffic along the High Street and therefore should not come forward until interventions are in place to relive traffic from Tranent High Street.

To address the key issues along Tranent High Street the proposals for the Tranent Eastern Expansion include the provision of a new relief road to the east of the existing settlement boundary and within the Tranent Eastern Expansion site. This proposed relief road will create an alternative thoroughfare allowing for a more manageable dispersion of vehicles on the road network surrounding Tranent and its residential areas.

The proposed Tranent Easter Expansion can be delivered in conjunction with the proposed Blindwells development. There is also potential to link to the proposed new A1 (T) interchange serving the Blindwells Development. This will support shared facilities between the two settlements and provide additional options for the routing of public transport services.

The Tranent Eastern Expansion relief road will provide new routing options for public transport services to serve the new development area as well as the existing areas in eastern Tranent.

As part of the development proposals, it is proposed to improve connections to the residential housing found to the west of the development. This will ensure that movement between Eastern Expansion and the existing Tranent development area for active travel modes is prioritised. These proposed connections will ensure that the development is legible by all modes of transport and will provide access to the site by sustainable modes of travel.

## Conclusion

This transport impact appraisal has demonstrated that the Tranent Eastern Expansion development is very well located to maximise opportunities for more sustainable travel and minimising the potential impacts on the existing constrained local and strategic road network, especially along Tranent High Street. This would be confirmed by the way of a full Transport Assessment.

## DOCUMENT 3: SITE EFFECTIVENESS ASSESSMENT

With respect to the assessment of site effectiveness set out in paragraph 55 of PAN 2/2010 the following assessment related to sites at East Tranent is appropriate at this stage : -

- ownership: the site is in the ownership/control of parties who are actively promoting the sites for development and who will release the land for development (there is already strong developer interest in the sites);
- physical: the sites are sufficiently free from constraints related to slope, aspect, flood risk, ground stability or vehicular access which would preclude their development. Final detailed ground investigation works remain to be completed but there is no material concerns that the sites will have unresolvable physical constraints that would preclude their effective development;
- contamination: previous use has not resulted in contamination of the sites;
- deficit funding: public funding is not presently required to make residential development economically viable;
- marketability: the sites can be extensively developed within the LDP period. It is anticipated that development could commence within 12 months of the LDP being adopted subject to securing the required permissions;
- infrastructure: Education infrastructure can be addressed by the proposal for a new Primary School (indeed this could also assist existing capacity constraints in Tranent) and off-site contributions to the expansion of Ross High; water and drainage infrastructure is readily available; and access solutions to all parts of the development exist; and
- land use: housing and related uses are preferred use of the land in planning terms.

