

Members' Library Service Request Form

Date of Document	21/03/17
Originator	Iain Mcfarlane
Originator's Ref (if any)	
Document Title	Proposed East Lothian Local Development Plan - Representations to Proposed Local Development Plan

Please indicate if access to the document is to be "unrestricted" or "restricted", with regard to the terms of the Local Government (Access to Information) Act 1985.

Unrestricted	<input checked="" type="checkbox"/>	Restricted	<input type="checkbox"/>
--------------	-------------------------------------	------------	--------------------------

If the document is "restricted", please state on what grounds (click on grey area for drop-down menu):

For Publication

Additional information:

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

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

For Office Use Only:	
Library Reference	31/17
Date Received	21/03/17
Bulletin	Mar17

Proposed East Lothian Local Development Plan Schedule 4 Representation Responses

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

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

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

For further information or advice, please contact:

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

From: .
To: [Local Development Plan](#)
Subject: Local Development Plan - Comment
Date: 04 November 2016 15:30:51

To whom it may concern

**Reference sites N7, N8, N9
Gullane Sites**

I have the following objections to make to the new Local Development Plan

These are Greenfield sites on prime agricultural land. There is a brownfield site in the middle of the village which is very appropriate for development.

They would be overdevelopment increasing the size of the village by as 30% Gullane does not have the infrastructure to support this amount of new housing. The school, medical practice, village hall etc.

The shops would only be accessible by car and there is insufficient parking for this.

There would be a negative impact on the very precious tourist industry.

Transport network is inadequate.

Station, access road to station is totally unsuitable for the amount of traffic that would be generated and there would be insufficient parking and platform length for increased train length.

There are not jobs at this end of East Lothian

The cumulative effect of these sites all being developed would be totally unmanageable.

Yours faithfully

Joy Grey

From:
To: [Local Development Plan](#)
Subject: Objections to Proposed Local Development Plan -Saltcoats (NK7); Fenton Gait East (NK8) and Fenton Gait South (NK9)
Date: 04 November 2016 15:57:49

Dear Sirs,

My name is Keith T. Anderson,

I write to object in the strongest terms to the Proposed Local Development Plan (the “Plan”), to the extent that it relates to **Saltcoats (NK7); Fenton Gait East (NK8)** and **Fenton Gait South (NK9)** and to request their removal from the Plan as sites suitable for housing development. I refer also to the objections which I have previously lodged in connection with the specific applications for planning permission in respect of each of **Saltcoats** and **Fenton Gait East**.

The development of these greenfield sites would be most undesirable for reasons that must be obvious. East Lothian generally is renowned for its countryside and is attractive for leisure and other recreational purposes; in the case of Gullane there is also the draw of the seaside and the golf courses, all of which attract visitors who contribute to the economy. There is scope for Gullane to take its fair share of the housing requirement for East Lothian by the development of the brownfield site at the Fire School, to which I have heard few if any objections. I have no doubt that if the greenfield sites are zoned for development they will be developed before the Fire School site, because they will yield a greater profit for the developers; in that case the Fire School site would be left to decay and at least ten years may pass before it is developed, if at all. It is only recently that the eyesore that was once the Templar Lodge (or Queen’s Hotel) has been removed from the landscape. That must not be allowed to happen again.

I find it surprising that it should be suggested that Gullane be developed to the extent proposed, and can only conclude that this is to encourage the construction of higher value homes in an area which can be expected to yield high Council Tax returns. It cannot be because there is local industry or employment, because there is relatively little commerce in the village and its immediate environs, and it is obvious that those who will acquire any properties that are constructed will commute to Edinburgh. This will inevitably have an adverse impact upon the road network, and give rise to congestion. It would seem obvious that if houses are being constructed for occupation by commuters these should be placed as close to transport links and the conurbations which will provide work, and so Gullane is conspicuously inappropriate.

In its recent announcement, in connection with the alleged interest by a Chinese developer to acquire it, CALA’s Chief Executive is reported as having described CALA as operating in “Waitrose –type” markets, and that it’s average selling price is £538K, whereas the UK average is £202,389. So hence my concerns in the previous paragraph and my scepticism over the provision of affordable housing; it’s just not going to happen, unless the brownfield site is the only site zoned for development.

The East Lothian Council must not yield to whatever pressure is allegedly being applied to it by the Scottish Government and it must discharge its planning function for the benefit of the local people whom it serves; it must not pander to a developer which is motivated by profit only, and has an eye to a lucrative exit for its shareholders.

Other reasons for my objections, all of which I have covered in my objections to the specific planning applications at Saltcoats and Fenton Gait East, relate to the impact on local facilities, the school and medical practice, and the social mix of the community which will be changed for ever, if over development is allowed and high value houses outnumber those that are affordable. That is why the development of the brownfield would be a positive as I expect it to reflect the mixed value housing which exists in the village at present.

Your faithfully.

Keith T Anderson

From: [Peter Grey](#)
To: [Local Development Plan](#)
Subject: Local Plan comment
Date: 04 November 2016 16:07:49

To whom it may concern

Reference sites N7, N8, N9

Gullane Sites

I have the following objections to make to the new Local Development Plan

These are Greenfield sites on prime agricultural land. There is a brownfield site in the middle of the village which is very appropriate for development.

They would be overdevelopment increasing the size of the village by as 30%

Gullane does not have the infrastructure to support this amount of new housing. The school, medical practice, village hall etc.

The shops would only be accessible by car and there is insufficient parking for this.

There would be a negative impact on the very precious tourist industry.

Transport network is inadequate.

Station, access road to station is totally unsuitable for the amount of traffic that would be generated and there would be insufficient parking and platform length for increased train length.

There are not jobs at this end of East Lothian

The cumulative effect of these sites all being developed would be totally unmanageable.

Yours faithfully

Peter Grey

The Grey Cottage, Goose Green, GULLANE, East Lothian EH31 2AT

Tel: 01620 842866

From:
To: [Local Development Plan](#)
Subject: East Lothian Council's Local Development Plan for NK7,NK8 &NK9
Date: 04 November 2016 16:08:41

Dear Sirs,

I strongly object to the proposed greenfield sites at Saltcoats (NK7) Fenton Gait East (NK8) and Fenton Gait South(NK9) being used for housing development in the VILLAGE of Gullane. These should be removed from the proposed LDP.

It is obvious that any future housing development should be on the Brownfield site at the old Fire Training School - nearer to all the village amenities.

Parking is already at a premium in the village and the proposed extra housing would result in extra traffic on the side roads which would be extremely dangerous in such a beautiful rural area.

The village School, Medical Centre and Village Hall are already struggling to cope with extra numbers of people moving into the area and the trains overcrowded with commuters who struggle to park at any of the local stations.

Please therefore, remove these three Greenfield sites from your proposed LDP plans and concentrate on the old Fire School. It is essential that Gullane remains a Conservation area to be proud of.

Yours Susannah Jackson,



Submission 0268

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

4th November 2016

**Proposed Local Development Plan 2016
Representations on behalf of Omnivale Ltd
Land and Tranent Mains, north east and east sides of Tranent**

On behalf of Omnivale Ltd, I enclose representations seeking the allocation of land on the north east sides of Tranent for residential and education purposes and an eastern relief road for Tranent. The part of overall site owned by Omnivale Ltd is known as "Tranent Mains". These representations are objections to the non-allocation of the overall site for these land uses in the Proposed LDP.

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 for residential, education and eastern relief road on the north east and east sides of Tranent on behalf of Omnivale Ltd

Introduction

These representations are made on behalf of Omnivale Ltd, owners of land adjoining the north east and east sides of Tranent as shown on the ownership plan (See **Appendix 1**) and forming the northern part of the area shown in the indicative development proposal document attached as **Appendix 2**.

Omnivale Ltd is working with R and A Kennedy who own adjoining land on the eastern side of Tranent to put forward a joint vision for a significant, strategic eastward expansion of Tranent.

These representations are submitted on behalf of Omnivale Ltd only and should be read alongside joint representations submitted by TMS Planning and Development Services on behalf of both landowners covering land on the north-east and east sides of Tranent.

The merits of a strategic release of land for housing on the north-east and east sides of Tranent

Tranent is one of the six main growth locations in East Lothian where new housing should be focussed. The town has a principal transport corridor (A1) close by and there are public transport services accessing Edinburgh and other smaller employment centres.

Tranent is located in the western part of the East Lothian Strategic Development Area and a focus on growth in this main settlement will promote Tranent as a service centre. **The issue for the LDP is deciding the side of the town where strategic growth should take place to maximise the benefits to Tranent.**

Omnivale Ltd accepts that a key requirement in allocating land for housing development is to ensure that resources are available to implement the plan in the required time frame. Omnivale Ltd and R and A Kennedy are in discussion with a number of volume housebuilders to deliver the housing and associated uses on their combined landholdings. The two landowners accept that together with housebuilders, they will need to fund infrastructure that will be required to allow development to proceed. Omnivale Ltd and R and A Kennedy accept that the following major pieces of infrastructure will have to be provided to allow development to proceed on the area subject of these representations:

1. An eastern relief road between Ormiston Road (B6164) and the Bankton Junction on the A1.
2. A new primary school to serve the new housing.

The two landowners are willing to facilitate delivery of these items of infrastructure. Creation of a relief road between the principal access into Tranent from the east and Bankton Junction would reduce CO₂ emissions in the town centre by diverting existing traffic flows and take new traffic resulting from development in this location away from the town centre and directly towards the A1. The relief road would be able to accommodate buses so that existing services could divert into the new neighbourhoods. WSP Engineers have undertaken a Transport Appraisal (see **Appendix 3**) which concludes that an eastern relief road within the land put forward in these representations would lead to more sustainable travel and help to reduce through traffic along Tranent High Street.

A new primary school would be accommodated on land to the south of Haddington Road. This would cater for pupils living in the new housing as well as any additional pupils from existing housing who are unable to attend Windygoul Primary School as a result of this school having no spare capacity.

Assessment of the land area subject of these representations

- ***Overall character and appearance of the area*** – the land is generally flat and slopes gently from south to north towards the A1. Substantial belts of landscaping can be included along the edges of the land to soften visual impact of new development. At present, the eastern edge of Tranent north of Haddington Road (A199) is stark and forms a hard urban edge. This would be softened by the inclusion of structural landscaping as part of an eastward expansion.
- ***Environmental and infrastructure opportunities and constraints*** – development on either the east side or south side of Tranent will entail building on agricultural land. The impact can be softened as discussed above. However, there is a unique infrastructure opportunity associated with an eastward expansion in the provision of an eastern relief road. This would result in a significant benefit of relieving the town centre of through traffic and in addition it would serve the new housing along its line.
- ***Accessibility*** – land on the eastern side of Tranent can be made extremely accessible to public transport services and the A1 as a result of the proposed relief road. The overall site owned by both parties is closer to Tranent town centre than the proposed allocation at Windygoul South (TT1) and development of the overall site would

therefore be more sustainable. The accessibility merits of the overall site to Tranent town centre are clearly illustrated on the map in Section 7.0 of the indicative development proposal document in **Appendix 2**.

- **Regeneration opportunities** – land released for new housing on the eastern side of Tranent is next to areas of relative deprivation (30% most deprived in Scotland) and would include new public open spaces and footpath links into the adjoining countryside. There would also be new affordable housing, creating opportunities for households living close by who wish to move to new accommodation and thereby release larger property.

Development on the eastern side of Tranent would also improve air quality in the town centre and provide a new primary school. Both landowners accept that development on their land would need to contribute to necessary infrastructure in accordance with the policy in the Proposed LDP on planning contributions and the tests in Circular 3/2012.

Summary of the merits of land for development on the north-east and east sides of Tranent

Compact growth

Omnivale Ltd supports the compact growth approach to development locations in the Proposed LDP. Tranent is a main settlement in the west of the SDA and is close to the origin of demand adjacent to the city. The town is an appropriate location for a strategic scale release of land for additional housing.

Longer term settlement strategy

Omnivale Ltd supports the approach of basing the Proposed LDP on a longer term settlement strategy to meet the SDP's housing requirements as well as planning for need and demand for housing post 2024. A proportion (350) of the 850 units proposed in the eastern expansion would be developed post 2024.

Proposed allocation TT1 at Windygoul South, Tranent

Omnivale Ltd objects to the allocation of a strategic release of land for approximately 550 houses at Windygoul South (site TT1 in the Proposed LDP). Development at Windygoul South would generate traffic movements which would come through the town centre and thereby harm air quality as well as causing congestion. Development on the south side of Tranent would not bring about the significant benefit of an eastern relief road which is an integral part of an eastern expansion of the town as promoted by Omnivale Ltd and R and A Kennedy.

New housing on the Omnivale Ltd - R and A Kennedy site would not need to go through the town centre and public transport could be directed through the new neighbourhoods to provide a sustainable transport alternative to private car travel. Development can be phased to ensure development complies with strategic planning objectives and the timescale of the Proposed LDP. An eastern expansion can also facilitate provision of a new primary school.

Delivery of completed housing units

Completions on the combined landholdings of Omnivale Ltd and R and A Kennedy as shown in **Appendix 2** would be at a similar rate to those anticipated for Windygoul South. The Omnivale Ltd - R and A Kennedy site has a combined capacity of approximately 850 units and the anticipated completions across the area would be as follows:

New Allocation	2009-2019	2019-2024	2024-2032	TOTAL 2009-2032
Tranent Mains & Tranent East	125	375	350	850

The above phasing is realistic and agreement to an eastward expansion of Tranent has the advantage of including a supply of land beyond the plan period.

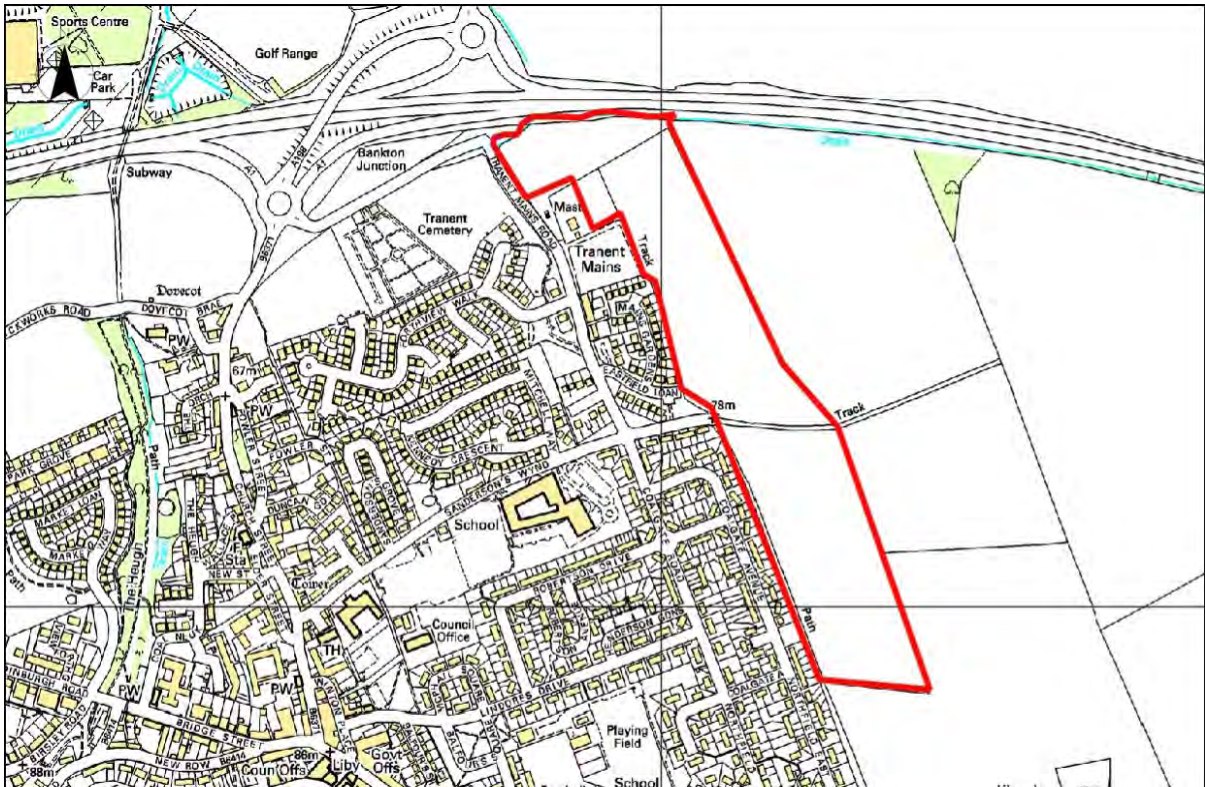
Education capacity

It is accepted that Omnivale Ltd would need to contribute towards expansion of education capacity to meet the need generated by additional housing on their land. The proposed eastern expansion of Tranent includes a site for a new primary school on land south of Haddington Road as indicated on the development proposal document in **Appendix 2**.

The Omnivale Ltd – R and A Kennedy proposals for an eastern expansion of Tranent include a site for a new primary school. In the first instance, new housing would have to contribute financially on a per dwelling basis towards expansion of existing schools. Once capacity in these schools has been taken up, new dwellings would make a proportionate contribution towards construction of the new school.

Andrew McCafferty Associates

November 2016



Tranent Mains - area owned by Omnivale Ltd

TRANENT

TRANENT EAST

TRANENT, EAST LOTHIAN

OMNIVALE LTD / R&A KENNEDY

INDICATIVE DEVELOPMENT PROPOSAL
ANDREW MCCAFFERTY ASSOCIATES / TMS PLANNING

FEBRUARY 2015

CONTENTS

1.0 INTRODUCTION

2.0 THE CONTEXT

3.0 THE SITE

4.0 CONSTRAINTS & OPPORTUNITIES

5.0 CONCEPT

6.0 LAYOUT

7.0 ARCHITECTURE / MATERIALS

8.0 CONCLUSION

1.0 INTRODUCTION

This document has been prepared in support of our representation for this site and its inclusion within the emerging Local Development Plan.

The approach taken outlines the characteristics of the site including development constraints and opportunities.

We have used this information to develop a concept and outline proposals for the site.

Author
EMA Architects + Masterplanners



VIEW ALONG THE HIGH STREET, TRANENT

2.0 : THE CONTEXT



ROSS HIGH SCHOOL



SANDERSONS WYND PRIMARY SCHOOL



WINDYGOUL PRIMARY SCHOOL



ADJACENT HOUSING DEVELOPMENT



THE HIGH STREET



GEORGE JOHNSTONE COMMUNITY CENTRE

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 School.

Housing within the area generally comprises of traditional two storey dwellings. There are also a number of 3 storey flats within the town. Materials are also traditional with a mixture of renders, natural and cast stone and tiled roofs.

3.0 : THE SITE



VIEW ALONG EXISTING EDGE OF SETTLEMENT



EXISTING TRACK ALONG EASTERN EDGE



VIEW SOUTH OVER SITE TOWARDS THE FORTH

3.0: THE SITE

The site is located on the eastern edge of Tranent, from the A1 corridor in the north to the B6371 / Ormiston Road in the south. To the west the site is bounded by the back gardens of existing residential development which essentially forms the settlement edge of the town. To the east of the site is open countryside.

The site generally slopes down from the Ormiston Road in the south to the A1 in the north. There are therefore open views across East Lothian towards the Forth.

Vehicular access is from Tranent Mains Road in the north, the A199 and the B6355 in the south. Importantly the site does not require access through the existing town centre.



- 1. LAND OWNED BY OMNIVALE
- 2. LAND OWNED BY R&A KENNEDY

4.0 : CONSTRAINTS & OPPORTUNITIES

The site is constrained by important features along each of its edges.








The A1 road and landscape corridor constrains the development site to the north but also provides excellent opportunity for access into the site.

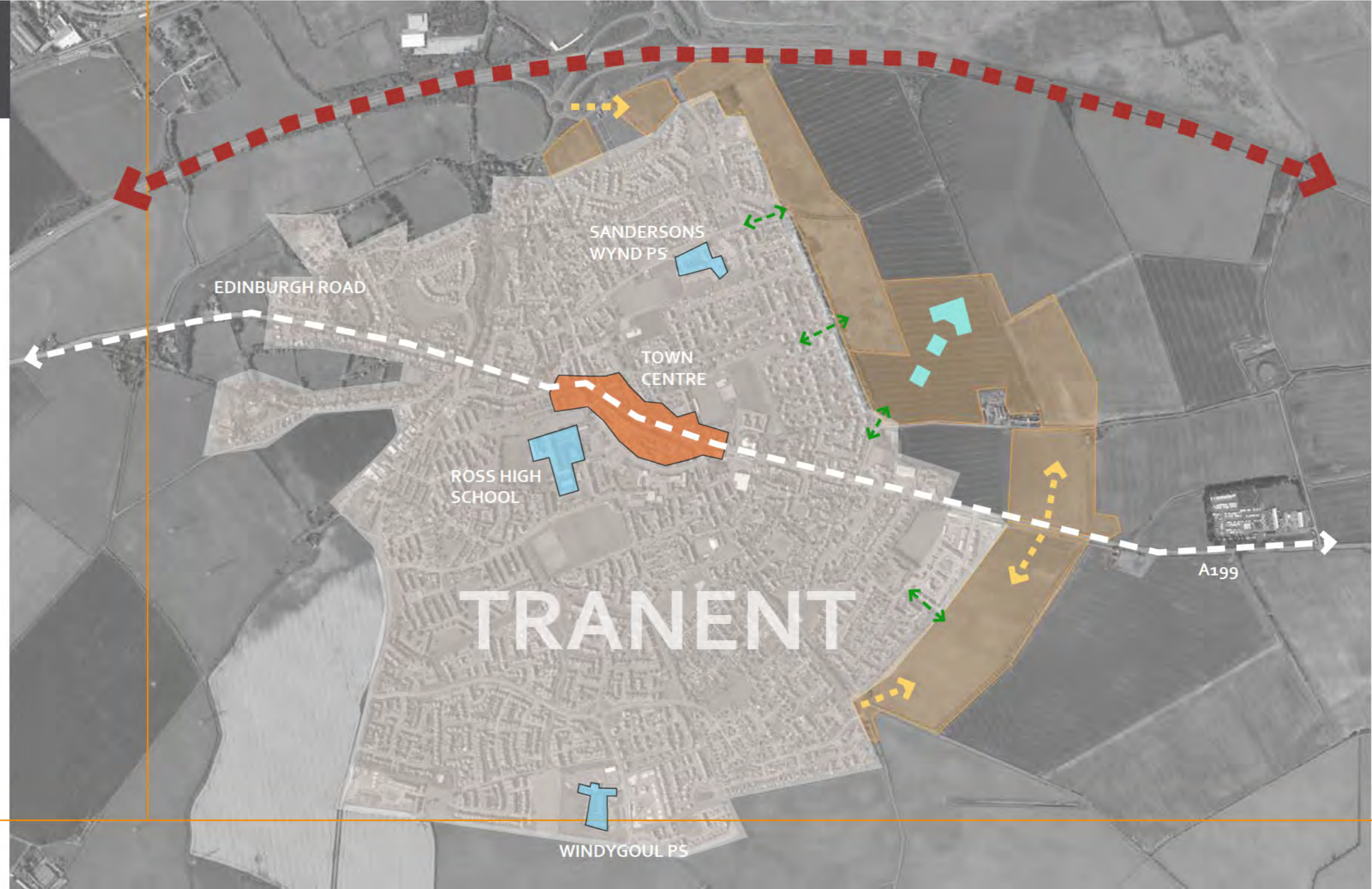
To the west the site is contained by the fences and rear boundaries of existing residential development which define the edge of Tranent.

The eastern boundary is open countryside and agricultural land. The southernmost part of the eastern edge (between the A199 and the B6355) is defined by established landscaping and an access track.

There 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 the local road network. However the most important factor, which the development of the site can deliver, is a relief road around the eastern side of the town which will help alleviate the existing pollution and congestion concerns within the centre.

There are also opportunities to take advantage of the views from within the site to the north and east towards the Forth and Bass Rock.

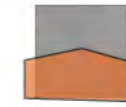
-  TRANENT TOWN CENTRE
-  A1 CORRIDOR
-  EXISTING ROAD THROUGH HIGH STREET CONTRIBUTING TO AIR QUALITY / CONGESTION ISSUES
-  EXISTING SCHOOLS
-  POTENTIAL FOOTPATH CONNECTIONS
-  POTENTIAL ACCESS POINTS TO RELIEF ROAD
-  VIEWS TOWARDS FORTH



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 through the new site and to the surrounding residential neighbourhoods
5. Provide new primary school site
6. Take advantage of the natural contours and features of the site to maximise the views out over the surrounding area
7. Provide positive frontage to new lanes and courtyards within new neighbourhoods
8. Provide much needed family housing within the area



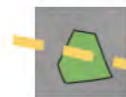
TRANENT TOWN CENTRE



EXISTING ROAD THROUGH HIGH STREET CONTRIBUTING TO AIR QUALITY / CONGESTION ISSUES



EXISTING ROUTES TO SURROUNDING AREAS AND DEVELOPMENT SITES ALL RUN THROUGH TOWN CENTRE



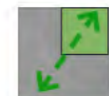
EXISTING / PROPOSED NEW RELIEF ROAD AVOIDING TOWN CENTRE



EXISTING SCHOOLS



PROPOSED PRIMARY SCHOOL



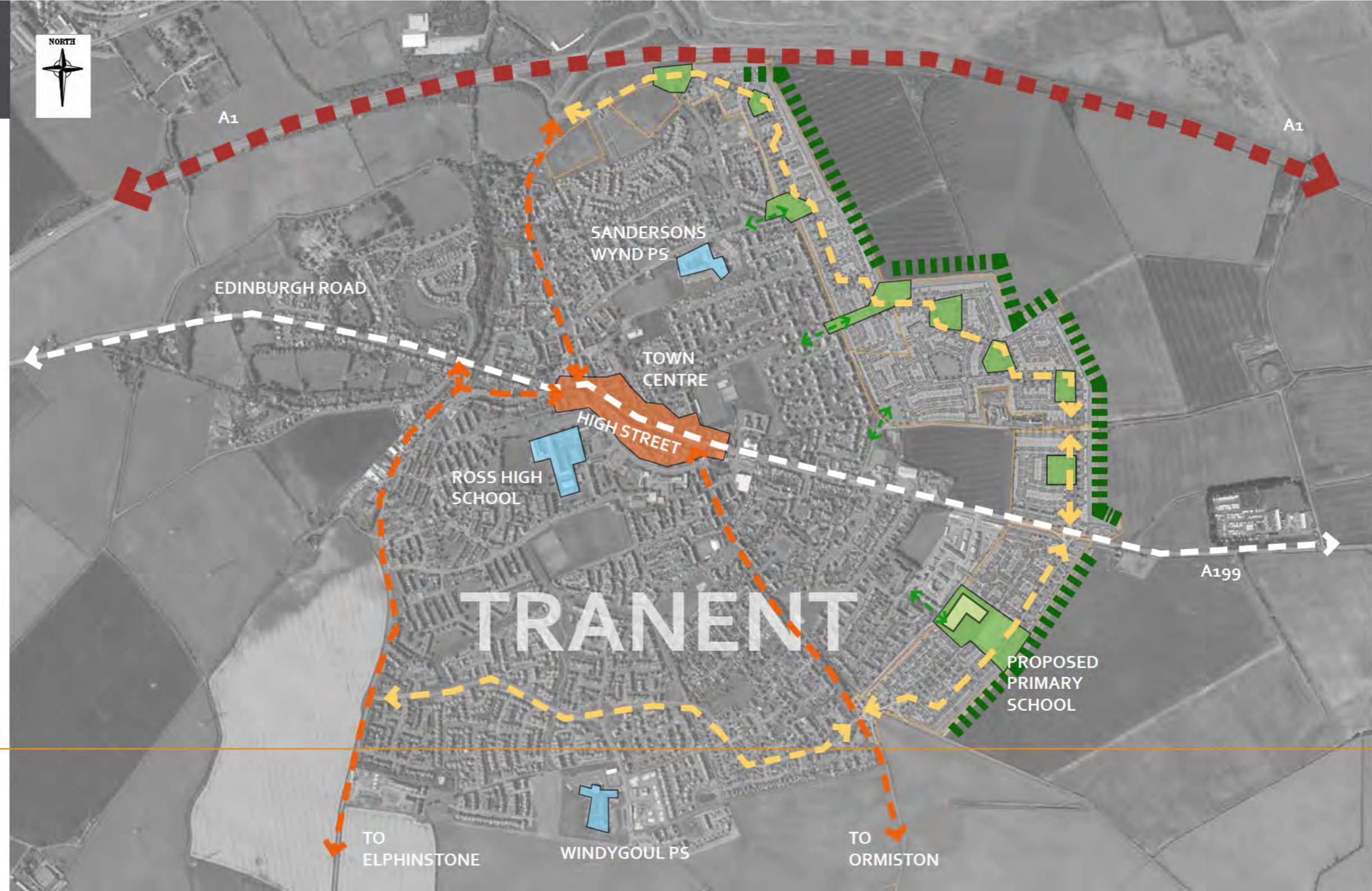
POTENTIAL FOOTPATH CONNECTIONS



PROPOSED OPEN SPACE



REINFORCED WOODLAND EDGE



6.0 : LAYOUT

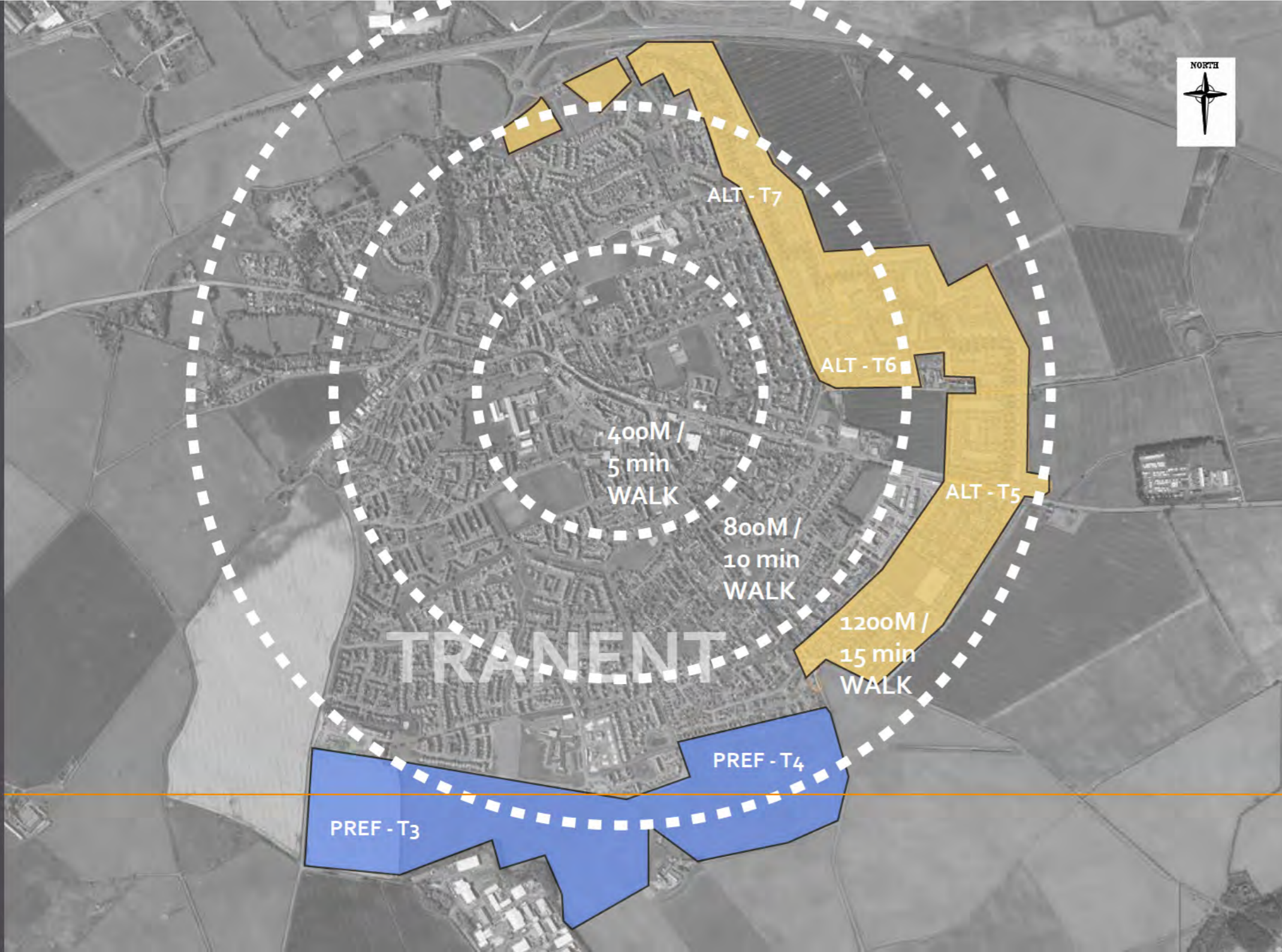
The layout has been developed to incorporate family housing which will be appropriate in terms of scale and character to the dwellings of the existing and proposed surrounding area.

The new neighbourhoods will be predominantly 2 storey in line with the immediately adjacent housing. There may be opportunities for some 3 storey buildings adjacent to key focal points within the new neighbourhood.

The combined site has a capacity for approximately 850 houses with generous private gardens, a primary school site and an array of public open space and structural landscaping. The new road system will provide access to the homezone type streets within the residential pockets, direct access to the school and a relief road for Tranent High Street. The layout will also be developed in accordance with latest guidance such as Creating Places and Designing Streets.

SUDS features would be incorporated in appropriate locations within the new neighbourhoods.





7.0: WALKING / CYCLING DISTANCE

Sustainability is an important aspect to consider in the planning of any new development or neighbourhood and its proximity to existing services and amenities.

At Tranent East much of the proposed housing would be located within a 10 minute walk of the existing town centre. This would be even shorter by bicycle along one of the improved footpath connections. The remainder of the new neighbourhood would be no more than a 15 minute walk from the centre of Tranent.

This is not the case with the proposed Windygoul South site which is largely outwith the 15 minute zone. The result will be increased car use through an existing town centre which already has significant issues with air quality and congestion.

With the opportunity to also provide the relief road, Tranent East represents a much more sustainable solution to settlement expansion.



8.0 : ARCHITECTURE / MATERIALS



TOLL HOUSE GROVE, TRANENT



BANKTON HOUSE

The proposed architecture and materials of the new development would be informed by the character of the surrounding area.

Simple traditional forms and detailing could provide the new area with a sense of place and identity from the outset.

Render and brick colours could be influenced by the colours of the existing buildings within Tranent and the surrounding area.

Recessive render colours with traditional tiled roofs would be appropriate.

Boundaries will be defined by hedges which draw from the existing features of the site and reflect the garden boundaries of existing housing within the town.

The layout of the streets, lanes and courtyards within the new neighbourhoods would be developed in accordance with latest local and national guidance such as Creating Places and Designing Streets.



TRADITIONAL HOUSING SANDERSONS WYND / POSITIVE BOUNDARY TREATMENTS

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 Tranent would be preserved and the edge of settlement to the east would be enhanced.

The development would also provide the opportunity to improve the existing footpath and cycle network and increase connectivity 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 settlement boundary and providing Tranent and East Lothian with a long term sustainable solution to providing new housing development.



ema

EMA Architecture + Design Limited
Chartered Architects
The Stables
38 Baileyfield Road
EDINBURGH EH15 1NA
t 0131 468 6595
f 0131 468 6596
www.ema-architects.co.uk

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:

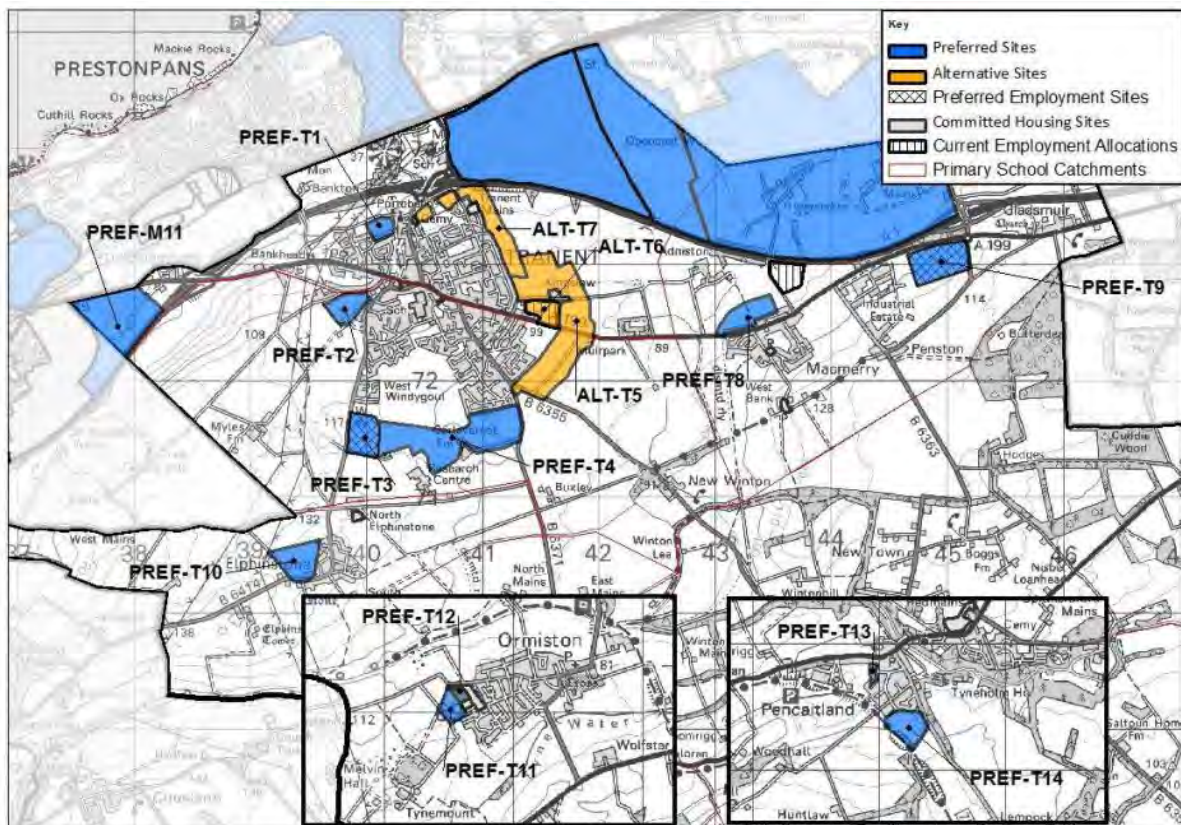
- Proposed Tranent Eastern Expansion Development Sites
- Key Issues
- Opportunities
- Development Strategy
- Summary and Conclusions

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 (Committed)	Blindwells 1	Blindwells 2	Tranent East	Goshen	Longniddry	Other Sites	Total Units
2	2024 Reference Case	1,600						5,000	6,600
12	Preferred BW1 / Tranent East & 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

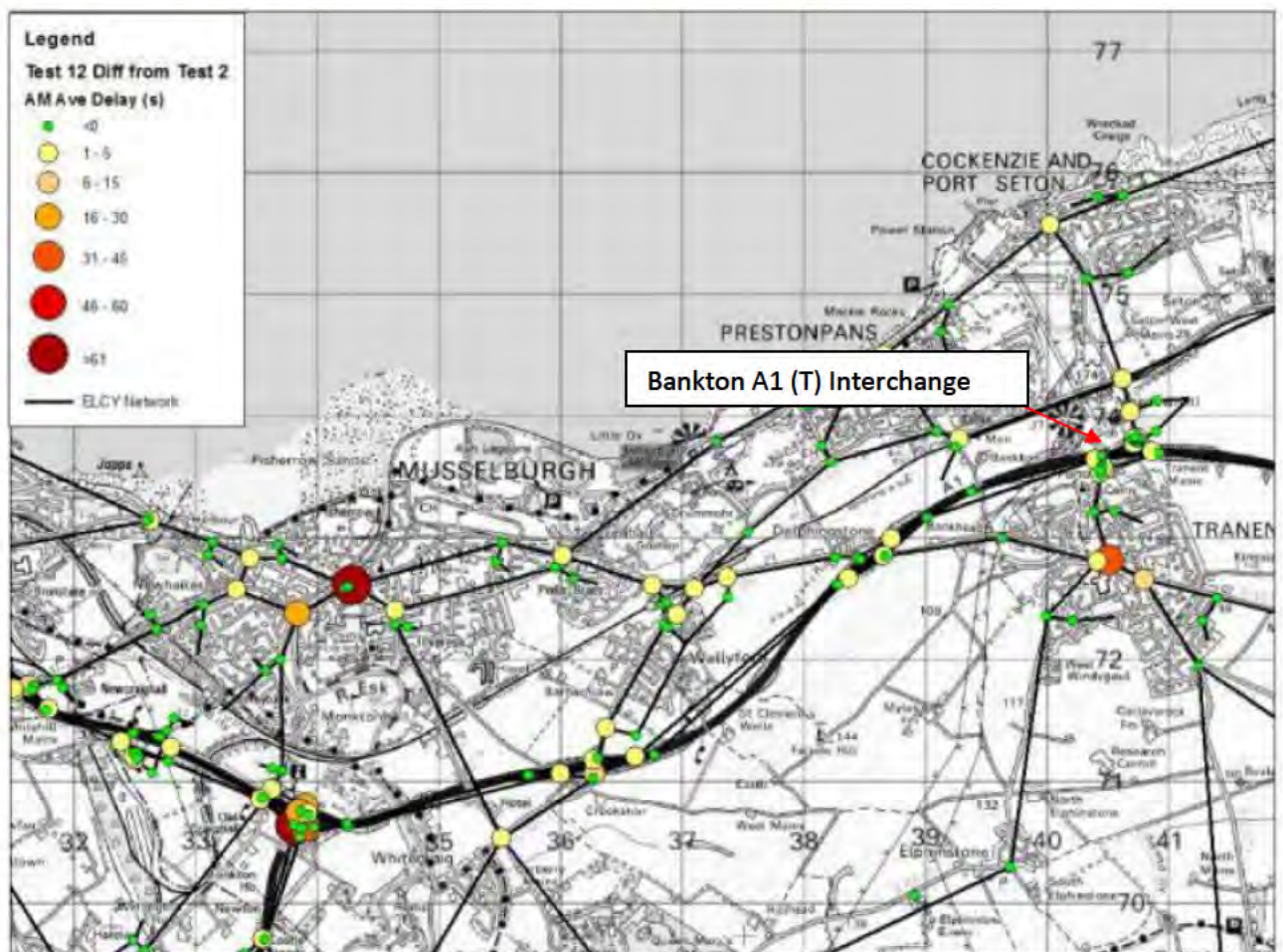


Figure Source: ELC / Systra

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

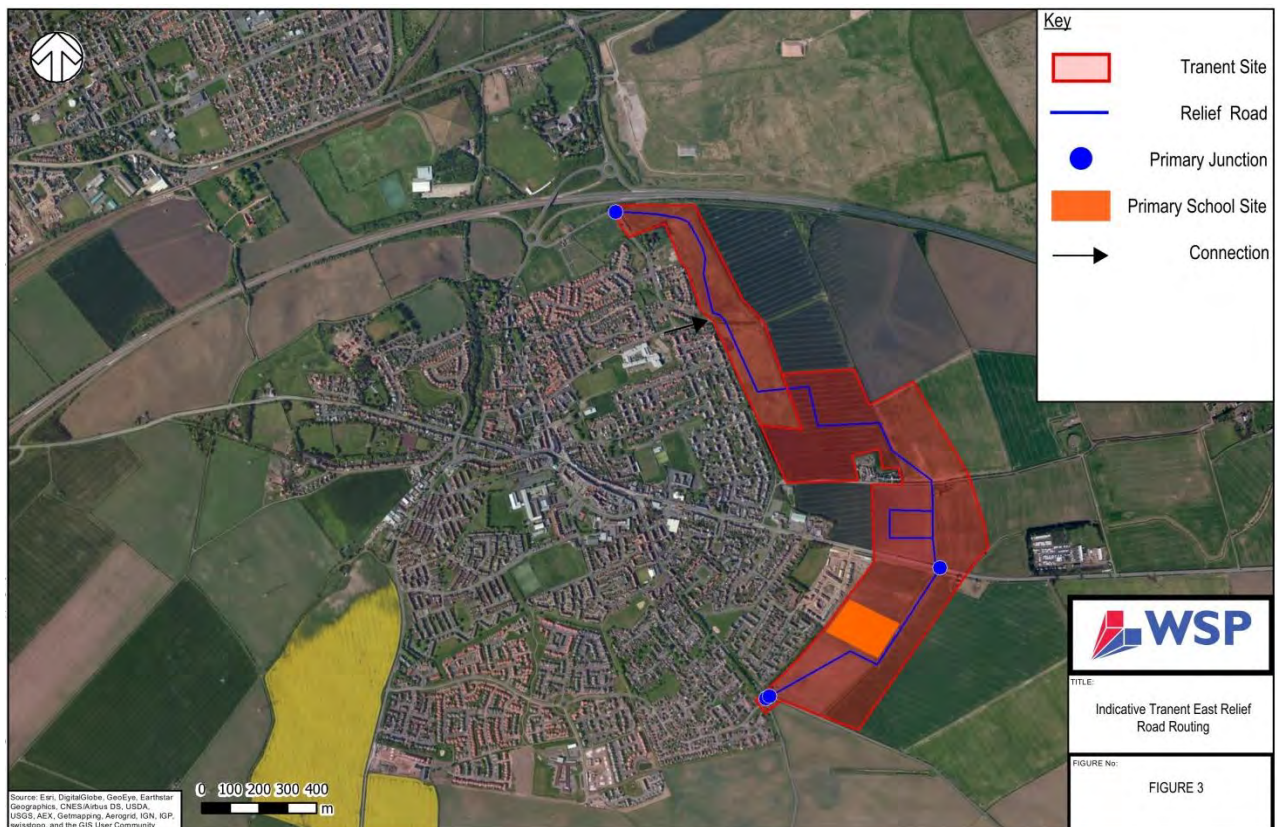
As presented in the section above the existing and projected future conditions within Tranent town centre are considered to be below acceptable air quality standards related to the high volume of traffic routed along the High Street as well as parking enforcement issues. To address this key issue, it 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 A1 (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 20mph 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 relieve 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

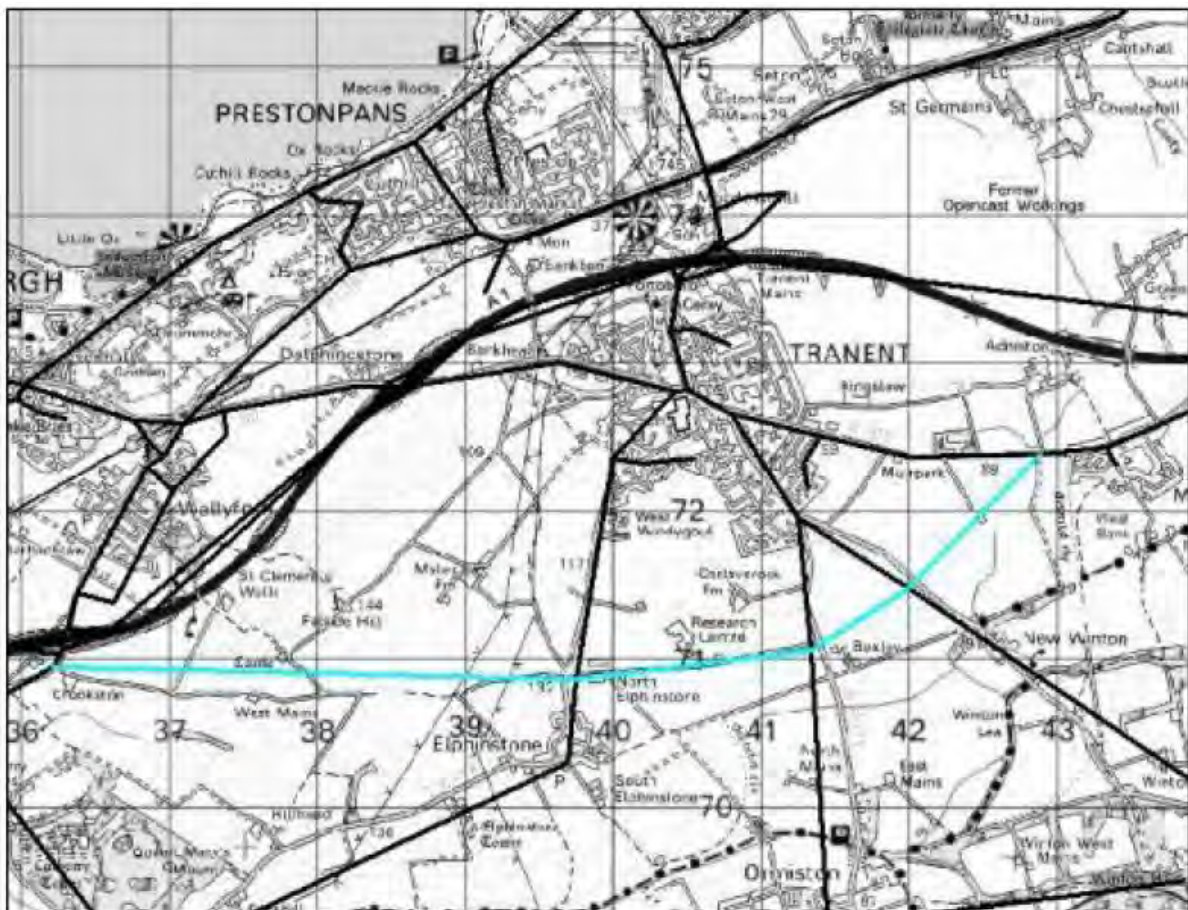


Figure Source: ELC / Systra

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 A1 (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 relieve 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 Eastern 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.

From: .
To: [Local Development Plan](#)
Subject: Objection to the Local Development Plan
Date: 04 November 2016 16:10:22

Dear Sirs

I wish to object to the Local Development Plan in relation to the proposals for Gullane ie NK7, NK8, and NK9 and request that these be removed from the LDP as sites for housing development for the following reasons:-

1. The developments proposed will be a complete over-development of a small village on a completely unreasonable scale.
2. The infrastructure impact of these developments has not been properly assessed. The roads around the village will be completely overwhelmed.
3. The inclusion of these greenfield sites in the LDP will result in the major brownfield site NK6 fire college delivery being compromised and possibly not developed.
4. I have already objected to the planning applications lodged for NK7, NK8, and NK9.

I trust my views will be considered along with all the other objections and these proposals removed from the local plan.

David Scott

3rd November 2016

Dear Sir / Madam,

Objection to Local Development Plan

I wish to lodge my objection to the inclusion of greenfield sites in Gullane into the new Local Development Plan and I request the removal of SALTCOATS (NK7), FENTOUN GAIT (NK8) and FENTON GAIT SOUTH (NK9) from the proposed LDP as sites for housing development. The reasons for my objection are as follows:

- 1) The village of Gullane would get bigger by 30% which is beyond a reasonable scale.
- 2) If all 4 of these sites are included in the plan it would be grossly unbalanced as Gullane would account for 50 % of all the sites in the North Berwick Coastal area.
- 3) The LDP does not assess the ability of Gullane to absorb the new housing and the cumulative effect of all 4 sites.
- 4) These three major sites are all located at one end of a village which is poor planning and does not consider the layout of the village and the facilities within it.
- 5) The impact on the rural roads has not been properly assessed. The C111 which runs along all three developments cannot cope with additional traffic, even if improved. This will become a safety issue and make the users of the road (including pedestrians, cyclists, horses and vehicles) at risk.
- 6) The proposed development is not sustainable based on the current public transport networks. The train links are currently over capacity at peak times and could not accommodate the additional access which would be required, particularly from Saltcoats (NK7).
- 7) This development would impact on the day to day life of the village and the tourism which is a large part of the area, particularly because of the proposed 10 year duration of the development. This is one of the most attractive areas in East Lothian. Tourism and leisure are very important to the area and I object to the development proposed as it would impact on these.
- 8) The village cannot cope with the additional number of people using its facilities. Both the school and the medical centre cannot cope with the additional number of families. The additional two classrooms proposed by ELC would be grossly inadequate for the number of additional pupils from the additional housing.
- 9) All of the village facilities such as shops etc are at the other end of the village. The proposed development would require a car journey to the local facilities which would increase the traffic and be bad for the environment.
- 10) It is already difficult to get parking in the centre of the village during the day. Additional developments of the scale proposed would impact on this even more. This would also become a road safety issue within the village.
- 11) **I object to** the inclusion of the greenfield sites on the grounds that they would compromise the development of the brownfield site at the Fire Station. This is in contravention of the Scottish Planning Policy that brownfield development should take precedence over greenfield development.

Yours faithfully,

Catherine Joshi

From:
To: [Local Development Plan](#)
Subject: Objection to East Lothian Local Development Plan -
file:///C:/Users/Ken/Downloads/Inset_Map_19_Gullane_v4.pdf
Date: 04 November 2016 16:15:05

Policy & Projects Development
East Lothian Council

Dear Sirs

As a householder and resident in Gullane for almost 40 years I wish to object to the scale of the proposed housing developments included on your map detailed above.

I can understand that Gullane has to take its share of increased housing in the County but the inclusion in your plan of 4 sites - 3 on green field - within Gullane to provide over 340 new houses in a village with currently just over 1000 houses must surely be far above our required share and would create a correspondingly major detriment to the environment and attraction of the village.

One of the main generators of wealth in the County, to provide for the services we require, is tourism and golf and Gullane is one of the main attractions. Development of housing with its associated increases in traffic, building work and disruption to facilities must be progressed at a sensible pace and the inclusion of the 4 proposed sites seems to conflict with this.

In my objection lodged on 14th September 2016 to the Fenton Gait site I urged you to give priority to the development of the brownfield site at the Fire Training Centre and to cancel proposed development of the other sites until that is complete and the effects on the village can be further assessed.

Yours faithfully
Kenneth E Howey

3rd November 2016

Dear Sir / Madam,

Objection to Local Development Plan

I hereby lodge my objection to the inclusion of Greenfield sites in Gullane into the Local Development Plan. I request the removal of SALTCOATS (NK7), FENTOUN GAIT (NK8) and FENTON GAIT SOUTH (NK9) from the proposed LDP as sites for housing development.

The reasons for my objection are as follows:

- 1) The increase of size of Gullane by 30% is beyond a reasonable scale. This is a
- 2) Should all these four sites are included in the plan it would account for 50 % of all the sites in the North Berwick Coastal area which is an unfair allocation.
- 3) The new LDP does not properly assess the ability of Gullane to absorb the new housing and the cumulative effect of all 4 sites. The sites are all located at one end of the village which is poor planning.
- 4) The impact on the rural roads has not been assessed properly. The C111 cannot cope with additional traffic and this will become a safety issue and make the users of the road (including pedestrians, cyclists, horses and vehicles) vulnerable.
- 5) The proposed development is not sustainable based on the current public transport networks which are only buses for the village. The nearest train links require a car or bus to access and are currently over capacity at peak times and could not accommodate the additional access which would be required, particularly from Saltcoats (NK7).
- 6) Tourism and leisure are very important to Gullane which is one of the most attractive areas in East Lothian. These proposed developments would impact on these. and on the day to day life of the village.
- 7) The village would not be able to cope with the additional number of people using it's facilities. The school and the medical centre would not cope with the additional number of families. The additional two classrooms proposed by ELC would be totally inadequate for the number of additional pupils from the additional housing.
- 8) The village facilities such as shops are at the other end of the village from the proposed sites which would require a car journey.
- 9) The inclusion of the greenfield sites on the LDP would compromise the development of the brownfield site at the Fire Station. This is in contravention of the Scottish Planning Policy that brownfield development should take precedence over greenfield development.

Yours faithfully,

Manish Joshi



THE PLANNING BUREAU LIMITED



Bournemouth • Coventry • Glasgow • Hatfield • Kettering
Manchester • Ringwood • Tawton • Woking • York

03rd November 2016

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

Dear Sir/Madam,

McCARTHY & STONE RETIREMENT LIFESTYLES LTD.

RESPONSE TO CONSULTATION ON THE EAST LOTIAN COUNCIL PROPOSED LOCAL DEVELOPMENT PLAN AND THE AFFORDABLE HOUSING & TENURE MIX SPG

As the market leader in the provision of sheltered housing for sale to the elderly, McCarthy and Stone Retirement Lifestyles Ltd considers that with its extensive experience in providing development of this nature it is well placed to provide informed comments on the emerging East Lothian Proposed Local Development Plan insofar as it affects or relates to housing for the elderly.

The provision of adequate support and accommodation for the increasingly ageing demographic profile of East Lothian is a significant challenge and, unless properly planned for over the next 20 years, there is likely to be a serious shortfall in specialist accommodation for the older population, which will have a knock on effect in meeting the housing needs of the whole area and wider policy objectives.

Growing Elderly Population

The Registrar General's most recent population projections for Scotland were published in 2012. It states that *"the population aged under 60 is projected to remain fairly constant with a small decrease in the 45-59 age group and a small increase in the number of the 0-15 age group whilst the number of older people is projected to increase significantly especially the 75+ age group."*

Scotland's population is at an all-time high. Over the next two decades it will significantly age with people over 65 estimated to increase by over half a million from 0.88 million to 1.43 million by 2035. New figures from the National Records Office of Scotland show that by 2037, a third of all households will be headed by someone aged over 65, and the number of older people living alone is set to rise by 51%. The rise is even more dramatic for the over 85s; some 161% higher.

The population aged 65 and over within East Lothian is expected to increase from circa 18,600 persons in 2012 to 26,300 persons in 2027 (based on National Records of Scotland figures 2014). This represents an increase of 41% of the number of older persons in the Authority. There is be a more pronounced increase in the population for the 'frail elderly, those aged 75 and over who typically require greater access to care and specialist accommodation, whose population is expected to increase from 8,500 persons in 2012 to 13,100 persons in 2027, an increase of circa 50%.



THE PLANNING BUREAU LIMITED



Bournemouth • Coventry • Glasgow • Hatfield • Kettering
Manchester • Ringwood • Taunton • Woking • York

The latest guidance in Scottish Planning Policy (June 2014) advises that *“As part of the HNDA, local authorities are required to consider the need for specialist provision that covers accessible and adapted housing, wheelchair housing and supported accommodation, including care homes and sheltered housing. This supports independent living for elderly people and those with a disability. Where a need is identified, planning authorities should prepare policies to support the delivery of appropriate housing and consider allocating specific sites”* (para 132).’

In light of the projected extent of this need McCarthy and Stone strongly feel that a robust and cogent strategy for meeting the diverse housing and accommodation requirements of the elderly is needed across the full suite of documents in the Local Development Plan.

The *Affordable Housing Quota and Tenure Mix*’ SPG provides a sub-chapter entitled ‘Specialist Provision’ acknowledges the ageing demographic profile of the Authority and the need to provide specialist housing provision.

In addition to an ageing population, the need for specialist provision is and will continue to become increasingly important for people with a physical disability; people with a learning disability and people with a mental health condition, due to a growing population generally; an increase in complex needs and dementia; increasing expectations and the policy objective of the Scottish Government to continue to shift the balance of care away from institutional settings.

The LDP, LHS and Strategic Plan for Health and Social Care Integration (2016) support the principle of specialist housing provision and provision for specific housing needs. There is also a commitment to achieving National Health and Wellbeing Outcomes, in particular Outcome 2 ‘People, including those with disabilities or long term conditions, or who are frail, are able to live, as far as reasonably practicable, independently and at home or in a homely setting in their community’.

The provision of adequate support and accommodation for the increasingly ageing demographic profile of East Lothian is a significant challenge and, unless properly planned for over the next 20 years, there is likely to be a serious shortfall in specialist accommodation for the older population, which will have a knock on effect in meeting the housing needs of the whole area and wider policy objectives.

Suggestions for the New Local Development Plan

To ensure the adequate delivery of specialist accommodation for the elderly we would ideally recommend an additional policy specifically dealing with this matter. We therefore welcome the Council’s commitment to the delivery of older persons’ accommodation by stating in paragraph 3.58 that *‘For Local Housing Strategy purposes, the HNDA will be supplemented by further study on the need and demand for specialist housing including accessible and adapted housing, wheelchair housing and supported accommodation, such as sheltered and extra care housing.’*

McCarthy and Stone would welcome the opportunity to be involved in any further studies the Council undertakes.



THE PLANNING BUREAU LIMITED



Bournemouth • Coventry • Glasgow • Hatfield • Kettering
Manchester • Ringwood • Taunton • Woking • York

To encourage Local Government to plan proactively for the development of specialist housing for the elderly a toolkit was developed by a consortium of national housing interests with representation from both the private and public sector entitled 'Housing in Later Life: Planning Ahead for Specialist Housing for Older People'. A copy of this document has been attached for your convenience.

This toolkit encourages a joined up approach to planning, housing and social care policy both in the collection of evidence and the development of specialist accommodation for the elderly. Fundamental to achieving this is the inclusion of policies supporting specialist accommodation for the elderly into the Local Development Plan.

Whilst we note the Council's intention to look deeper into older persons' accommodation in an independent study and that policy HOU5 & 6 provide guidance on the development of, or development impacting on, care and residential homes. We feel that a more generic 'catch all' policy encompassing all forms of specialist accommodation for the elderly would be more beneficial, particularly in lieu of a more detailed study on this issue.

Whilst we appreciate that no one planning approach will be appropriate for all areas, an example policy wording is provided that could be included:

"The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations.

The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances and to actively encourage developers to build new homes to the 'Lifetime Homes' standard so that they can be readily adapted to meet the needs of those with disabilities and the elderly as well as assisting independent living at home.

The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities."

Affordable Housing

Specialist accommodation for the elderly requires sites located in close proximity to shops and services to allow residents to maintain their independence. A typical site is therefore a high value, previously developed site located in or adjacent to a town or local centre. There has been historical difficulty in delivering housing on brown field sites in the recent past and despite the economic recovery in many instances the viability of development on such sites will be marginal. This is exacerbated for the development of specialist accommodation for the elderly which is more finely balanced in terms of viability than standard, general needs housing due to the slower sales rate, higher provision of communal floor space and higher build costs.

The revised Scottish Planning Policy stipulates that 'Where permission is sought for specialist housing, as described in paragraphs 132-134, a contribution to affordable housing may not always be required.' Given the existing difficulties with the viability of development however we would encourage the Council to explore the possibility of removing the requirement for affordable housing contributions from specialist accommodation for the elderly to encourage development of this nature to come forward.



THE PLANNING BUREAU LIMITED



Bournemouth • Coventry • Glasgow • Hatfield • Kettering
Manchester • Ringwood • Tutunton • Woking • York

In September 2015, an independent panel was appointed by Scottish Ministers to review the Scottish planning system. The report of the panel, "Empowering Planning to Deliver Great Places" was published on May 31, 2016. Under the topic of housing delivery, the authors wrote that "*future proofing is needed to ensure the needs of Scotland's ageing population are met*" and that "*there are questions about the extent to which the housing needs of disabled people, as well as the growing elderly population are being met*" at present.

- **Recommendation 16** calls for a programme of innovative housing delivery to be progressed in a way which is fully aligned with local development plans. It goes on to say that "a proactive approach to expanding homes for the elderly" is a key priority.
- **Recommendation 24**, suggested that Section 75 planning obligations for housing developments should be minimised and the process behind them streamlined. This recommendation explicitly states: "*Scope for using conditions rather than planning obligations in some circumstances could create further efficiencies and should therefore be explored further. More diverse housing types, including the Build to Let sector and homes for older people could be incentivised where requirements are more finely differentiated to reflect their different impacts.*" (Emphasis own)

It is noted that the '*Affordable Housing Quota and Tenure Mix*' SPG stipulates that amenity / sheltered / retirement housing falling under Use Class 9 will fall under the Council's affordable housing policy and the 25% affordable housing quota. This is disappointing and we would ask that the Council reconsider its approach.

McCarthy and Stone have provided Affordable Housing contributions for some of their sites, notably the £430,000 in Affordable Housing contributions for the development at Tantallon Road, North Berwick. This was paid at the time in the interests of commercial expediency as rather than challenge this issue and delay the planning consent it was deemed critical at that time to proceed with the land acquisition. It is however unlikely that a similar development in different settlements within the Authority would be able to support a level of contribution of this scale.

We also note that in the 'Specialist Housing' sub-chapter of the SPG the Council acknowledges that '*the majority of older people live in private mainstream housing*'. The same sub-chapter also acknowledges that '*Social housing providers currently provide the majority of sheltered housing developments...*' which is at odds with the tenure profile of the Authority.

It then goes on to say that: '*However a potentially substantial proportion of those with a particular housing need are unlikely to have equity available in their existing homes, to have the capacity to fulfil their housing needs in the private market*'

Whilst we acknowledge that parts of East Lothian suffer from deprivation, a considerable proportion of the existing housing stock in the Authority is of high value. A substantial proportion, if not the majority of older owner occupiers should be in a position to fulfil their housing needs through the private market. The Council should look towards ways of encouraging developers of private specialist housing, such as McCarthy and Stone, into mid and lower value housing market areas within the Authority. The most



THE PLANNING BUREAU LIMITED



*Bournemouth • Coventry • Glasgow • Hatfield • Kettering
Manchester • Ringwood • Taunton • Woking • York*

effective way for East Lothian Council to make these locations viable for developers would be to remove the affordable housing requirement.

McCarthy & Stone considers East Lothian to be a key authority and has aspirations to deliver a range of specialist accommodation throughout the Authority. Ideally including any opportunities for an Assisted Living (Extra Care) development, such as that completed Lyle Court in Barnton, Edinburgh.

In summary, McCarthy and Stone stress the need to consider addressing the current and future housing needs of older people within East Lothian and for the Council to take this opportunity to positively address this issue within the emerging LDP.

Yours faithfully

Campbell Purves
Senior Planning Associate
Tel: 0141 420 8300
Email: campbell.purves@theplanningbureau.ltd.uk

Sirius Sport & Leisure – Representations to Proposed Plan Representation about Gula Flats (Howe Mire)

About You

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

Section 2a - Musselburgh Cluster Strategy Map (pg 15)

1a. Strategy Map for Musselburgh Cluster - what modifications do you wish to see made to the Strategy Map for the Musselburgh Cluster in the proposed Plan? Your justification for this will be sought in the next question.

Modifications(s) Sought:

The site boundary should extend to 11.8 ha rather than the 10.7 ha identified by the Council in the *Development Brief* and accordingly, the plan shown for PROP MH13 on the *Spatial Strategy for the Musselburgh Cluster* (page 15 of the Proposed Plan) should show a different boundary.

The name of the allocation should be changed to *Gula Flats* from *Howe Mire*.

1b. Strategy Map for Musselburgh - Please give any information/reasons in support of each modification suggested to the Strategy Map for Musselburgh in the proposed Plan.

Justification for Modification(s):

For the reasons given below, the boundary for PROP MH13: *Land at Howe Mire, Wallyford* should be amended as shown in the *Development Framework Report* supporting this representation.

The site name given by the Council is *Howe Mire*. The site is not located at Howe Mire which is some distance away to the west. It therefore gives rise to an impression that development is proposed in an alternative location. It is locally known by its historic name of *Gula Flats*. All submissions made to the Council by Sirius Sport & Leisure Ltd refer to *Gula Flats*. Accordingly, the Council is invited to amend the name.

Section 2a - Musselburgh Cluster Main Development Proposals (pages 15-26)

13a. PROP MH13: Land at Howe Mire, Wallyford - What modifications do you wish to see made to Prop MH13 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

Paragraph 2.38 in the Proposed Plan is as follows:

Land at Howe Mire is allocated for circa 170 homes and could also provide land for employment uses. The Howe Mire site is located within the core of the designated Pinkie Battle site, adjacent to the existing urban boundary. The previous planning appeal decision in relation to land at Barbachlaw has allowed some encroachment of development beyond the existing urban boundary, on to greenfield land within the core of the battle site. Particular considerations for the Howe Mire site will be a need to demonstrate that the land can be developed in line with Policy CH5. A suitable site access solution for this site will also be required that complements and does not undermine proposals for access for PROP MH9.

Sirius Sport & Leisure is seeking modifications to paragraph 2.38 to the following:

Land at Howe Mire is allocated for circa 170 homes and ~~w~~could also provide land for employment uses. ~~The Howe Mire site is located within the core of the designated Pinkie Battle site adjacent to the existing urban boundary. The previous planning appeal decision in relation to land at Barbachlaw has allowed some encroachment of development beyond the existing urban boundary, on to greenfield land within the core of the battle site.~~ Particular considerations for the Howe Mire site will be a need to demonstrate that the land can be developed in line with Policy CH5. A suitable site access solution for this site will also be required that complements and does not undermine proposals for access for PROP MH9 and vice versa for PROP MH 13.

13b. Please give any information/reasons in support of each modification suggested to Prop MH13 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

Modifications to Paragraph 2.38

Sirius Sport & Leisure is committed to delivering a mixed use development including economic development as part of the proposal. The *Development Framework Report* submitted in support of the allocation of this site in the Proposed Plan and at the previous stages of the emerging Local Development Plan, confirms the delivery of economic development on the allocated site. It is requested that the text in the first sentence is amended from *could* to *would*.

The text relating to the site's location in *...the core of the battle site* needs to be updated to reflect ongoing research about the location of the main fighting area. It is recommended that the second and third sentences are deleted for the following reasons.

Recent research highlights that the further evidence provided by Historic Environment Scotland (HES) to support its conclusion that *...the battle was fought on the open ground to the east of Inveresk, around the Howe Mire* is challenged and rejected by researchers Dr DH Caldwell; AOC Archaeology and Geddes Consulting. The evidence referred to by HES does not support a conclusion reached in the Inventory that the

location of the battle and the main fighting area was to the east of Inveresk. Nor does it support the Council's contention that this site is part of ...*the core of the battle*.

Further, metal detecting at Gula Flats has resulted in a lack of battle related finds. This indicates that there is no material archaeological evidence to support the interpretation in the Inventory that the main engagement area was east of Inveresk.

The interpretation offered by HES about the location of the battle continues to be at variance with its own analysis and descriptions reported in the Inventory. There is no evidence to substantiate that this site is in the core of the battlefield. It should be noted that HES does not wish to adopt the term 'core' in describing the battle and therefore its use in the Proposed Plan is contrary to its position.

The researchers conclude that the Inventory presents a somewhat confused script about the location of the main engagement between the armies. This confusion is amplified by reference to the Inventory Deployments Map showing the locations of the respective armies.

The following summarises the current interpretation associated with the battle and its manoeuvres.

1. *The location of the English army*

The final location of the English army is the key anchor in determining the location of the main fighting area. There is no difference in opinion about its general location between HES and the researchers. There is convergence of agreement about this location, as shown on page 7 of the *Development Framework Report* submitted along with this representation. Dr Caldwell; AOC Archaeology; Geddes Consulting as well as HES are in agreement about its general location.

The English army had mobilised at this location, part on the hill slope and the plain, after its march from its camp. By this time, the Scots army was well south of the open plain, to the east of Inveresk. Indeed, the Inventory text indicates that the Scots army would have been within 500m of the English army.

2. *Distance between Armies*

HES's agreed distance between the armies is less than 500m and therefore the Inventory's identified area of the main engagement is fundamentally at variance with the location of the English army. The plan shown on page 7 of the *Development Framework Report* submitted along with this representation confirms that the distance from the English army on the hill slopes to the open fields of Inveresk, near Howe Mire is up to 1,500m.

As the Inventory text concludes that both armies were only 500m apart at the engagement, the main fighting area must therefore be to the south of the A1 as shown on page 7 of the *Development Framework Report* submitted along with this representation.

3. *Battle arrays deployed at time of main engagements*

The contemporary accounts of battle by Patten locate the Scottish army to the front of the English army, most likely to the north west of the English battle arrays.

Dr Caldwell's latest research carried out in 2015 about the battle now shows the detail of the battle arrays and movements of both armies up to the main engagement. This confirms how the armies faced each other as the Scots army manoeuvred its battles at the point of engagement with the English army only a short distance away (up to 500m).

Dr Caldwell's interpretation of the movement of each armies' battles in formation provides an invaluable insight to the manoeuvres across the battlefield as well as setting the scale of these individual battles on the battlefield.

There is no difference in opinion about the general disposition of how the respective battles of the Scots and English armies were arrayed. His research greatly assists in locating the individual battles as well as both armies in the battlefield landscape with the main fighting area to the south of the A1.

4. *Sequence of manoeuvres across battlefield*

An analysis of the battle manoeuvres described, and illustrated in diagrams by Patten, has been mapped in the historic landscape of the battlefield. This sequence of manoeuvres leads to the location of both armies to south of the A1, between St Clement's Wells and Crookston. These manoeuvres and battlefield relationships are set out on page 9 of the *Development Framework Report* submitted along with this representation.

The researchers have sought to fit together the sequence of manoeuvres described by Patten in both text and diagrams. This sequence is further proof that the Scots army did not march to an engagement with the English army at Howe Mire but to Crookston, south of the A1.

This shows the sequence of battle manoeuvres and visual relationships which are still retained in the modern landscape and those which have been lost over time due to urban development.

The battlefield relationships which have been lost over time to urban and other development are:

- the march of the English army from its camp through Wallyford to its position to face the Scots army;
- the march of the Scots army from its camp to assemble at the two hillocks;
- the Scots army viewing the English army as it made for the hillslopes; and
- the English army viewing the Scots army as it advanced southwards, off the two hillocks as it tried to march to the hillslopes.

Many of the other relationships can still be appreciated from a series of viewpoints across the battlefield.

The researchers also conclude that a major impediment to an understanding of the relationships across the battlefield is the disruption caused by the route of the A1 through the battlefield.

The construction of the A1 has brought about significant change in surrounding ground levels to accommodate its route and the landscaping along its embankments further screen the battlefield relationships. It is a major intrusion to understanding of the battle.

The retained relationships in the modern landscape (as shown on page 9 of the *Development Framework Report* submitted along with this representation) are important as they form the foundation for any future heritage interpretation of the battle, set in the current landscape.

5. *Ongoing metal detecting at Crookston*

A metal detecting survey has been carried out at Crookston which is the focus of the main fighting area, as shown on page 9 of the *Development Framework Report* submitted along with this representation. Well over 1,500 metal artefacts have now been collected. These are now undergoing examination to clarify whether these finds relate to the Battle. Some of the finds relating to the period of the Battle include:

- A probable late medieval crotal bell;
- Buttons and Coins;
- Several axe heads;
- Several lead shot;
- Several arrowheads;
- Piece from the rim of a copper alloy, cast laver, with a handle mount in the form of a human bust;
- Embossed copper alloy mounts with Tudor rose designs probably horse fittings/ornamentation;

- Copper alloy mount in the form of an imperial crown;
- Copper alloy buckles;
- Screws with pierced heads, possibly for securing the jaws of a cock on a gunlock;
- Sherds of copper alloy cast vessels; and
- Copper alloy scabbard mount.

These and other finds when analysed, will be the most comprehensive assemblage of finds relating to the Battle found to date. The Council and HES is aware of this ongoing research and its implications for the Inventory.

The text in Paragraph 2.38 therefore needs to be amended to reflect ongoing research over the last 2 years. Reference to the site being in the core should be deleted as being irrelevant and an adjacent decision at appeal should be deleted. The key issue of the significance of the impact on the battlefield is fully covered by reference to Policy CH5: *Battlefields* and this is retained.

It is acknowledged that adjacent allocated sites should respect requirements for access; connectivity and permeability. Accordingly, these requirements are mutual and apply to both sites. Hence, the addition of the text in the final sentence.

17a. Policy MH17: Development Briefs - What modifications do you wish to see made to Policy MH17 of the Plan? Please state all relevant paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.

Modifications(s) Sought:

Policy MH17 is as follows:

Policy MH17: Development Briefs

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

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

Sirius Sport & Leisure proposes the following amendment:

Policy MH17: Development Briefs

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

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

17b. Please give any information/reasons in support of each modification suggested to Policy MH17 of the Plan. State all relevant paragraph numbers of the plan to which the modification(s) refer.

<p><i>Justification for Modification(s):</i></p>
<p>The Council's site <i>Development Briefs</i> are based on limited information and surveys. It is probable that through further detailed survey and design, an acceptable proposal could be delivered. At this stage in the planning process, a degree of flexibility is necessary. This is already highlighted in relation to the wording in PROP MH13.</p> <p>Accordingly, compliance with the site <i>Development Brief</i> should incorporate some flexibility. In terms of the <i>Development Brief</i> for this site, a case is presented in the <i>Development Framework Report</i> for a second access from Salter's Road to improve permeability and connectivity of the site to adjacent developments already under construction.</p> <p>It should also be noted that the boundary of the site is smaller because of an error by the Council is showing the boundary of the adjacent Stadium car park in the wrong location. This reduces the site by 1.1 ha.</p> <p>The site boundaries are shown the <i>Development Framework Report</i> and these should be adopted in the Local Development Plan.</p>

<p>Section 3a - Planning for Housing (pages 64 - 73)</p>
<p><i>1a. Housing & Housing Land Requirement - What modifications do you wish to see made to the Housing & Housing Land Requirement section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.</i></p> <p><i>Modifications(s) Sought:</i></p>
<p>Sirius Sport & Leisure has commissioned an <i>Assessment of the Housing Land Supply</i>.</p> <p>This Assessment calculates the Housing Land Requirement to be met in the Proposed Plan, taking account of the Housing Supply Target set by SESplan.</p> <p>The Housing Land Requirement has then been compared with the effective housing land supply. This effective housing land supply includes completions from the Established Housing Land Supply as well as the proposed allocations.</p> <p>The conclusion from this Assessment is that there is a significant shortfall of homes in the period to 2019. Accordingly, it is recommended that the Council, in formulating its Schedule 4s for the Examination, allocates additional land to meet this short term requirement.</p>
<p><i>1b. Please give any information/reasons in support of each modification suggested to Housing and Housing land Requirement section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.</i></p> <p><i>Justification for Modification(s):</i></p>
<p>Please refer to the <i>Assessment of the Housing Land Supply</i> submitted in support of this representation.</p>
<p><i>2a. Established Housing Land Supply - What modifications do you wish to see made to the Established Housing Land Supply section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next</i></p>

<p>question.</p> <p><i>Modifications(s) Sought:</i></p>
<p>Please refer to the <i>Assessment of the Housing Land Supply</i> submitted in support of this representation. Table HOU2: <i>Housing Land Requirements and Supply</i> should be modified as set out in this Assessment.</p>
<p><i>2b. Please give any information/reasons in support of each modification suggested to the Established Housing Land Supply section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.</i></p> <p><i>Justification for Modification(s):</i></p>
<p>Please refer to the <i>Assessment of the Housing Land Supply</i> submitted in support of this representation.</p>
<p><i>3a. Maintaining an Adequate Effective Five-Year Housing Land Supply - What modifications do you wish to see made to the Maintaining an adequate Effective Five-Year Housing Land Supply section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.</i></p> <p><i>Modifications(s) Sought:</i></p>
<p>Please refer to the <i>Assessment of the Housing Land Supply</i> submitted in support of this representation.</p>
<p><i>3b. Please give any information/reasons in support of each modification suggested to the Maintaining an Adequate Five-Year Housing Land Supply section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.</i></p> <p><i>Justification for Modification(s):</i></p>
<p>Please refer to the <i>Assessment of the Housing Land Supply</i> submitted in support of this representation.</p>

<p>Section 7 - Design (pages 137-141)</p>
<p><i>8a. Development Briefs - What modifications do you wish to see made to the Development Briefs section of the proposed Plan? Please state all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer. Your justification for this will be sought in the next question.</i></p> <p><i>Modifications(s) Sought:</i></p>
<p>Policy DP9: <i>Development Briefs</i> is as follows:</p> <p style="padding-left: 40px;"><i>Proposals for the development of sites that are subject to a development framework or brief that has been adopted by the Council must conform to the relevant framework or brief.</i></p> <p>We recommend the policy is modified to read as follows:</p> <p style="padding-left: 40px;"><i>Proposals for the development of sites that are subject to a development framework or brief that has been adopted by the Council must should generally conform to the relevant framework or brief. Where a site is adjacent to another allocated site, regard should be given to mutual connectivity and</i></p>

permeability between adjacent sites, and complementary landscaping and boundary treatments as appropriate.

8b. Please give any information/reasons in support of each modification suggested to the Development Briefs section of the proposed Plan. State all relevant policy and/or paragraph numbers of the plan to which the modification(s) refer.

Justification for Modification(s):

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

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

The Council's Development Briefs do not currently have regard to implications of other adjacent sites.

There will be occasions where developers will proceed in advance of each other on sites which share a common road frontage. It is imperative that in these occasions, developers have regard for the development briefs of adjacent sites to avoid unintentionally frustrating development. For example, an allocated site could have a limited frontage for access due to topography or sightlines. If a new junction is located on the opposite side of the road, the access into the other allocated site may be prevented.

The proposed modification would ensure that mutual arrangements are taken into account by the development briefs on adjacent sites.



Gula Flats, Wallyford

Development Framework Report

Representation to Local Development Plan

November 2016

Contents

1. Introduction	2
2. Site and Settlement Appraisal	4
3. Battlefield and Heritage Assessment	8
4. Development Proposal	12
5. Benefits for Wallyford	14
6. Recommendation to Council	16





This site is in a sustainable location and offers the potential to provide a sustainable development.

1. Introduction

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

The site at Gula Flats is owned by Howard Wallace (Sirius Sport & Leisure). This site is being promoted for a mixed use development including up to 170 homes with employment, leisure and tourism uses.

This Development Framework Report responds to the Council's Site Assessment presented in the *Proposed Local Development Plan Environmental Report Appendix 5: Musselburgh Area Site and Strategic Environmental Assessments* (SEA ref: PM/MH/HSG067).

The Council however has appraised a site known as *South West Wallyford* (PM/MH/HSG067) which represents a substantially bigger site extending to over 23 ha. The allocated site at Gula Flats is only 11.8 ha.

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

Strategic Development Opportunity

This site is in a sustainable location and offers the potential to provide a sustainable development. The site is part of the East Lothian Strategic Development Area and is therefore a preferred location for future development.

The proposals for the Gula Flats site will continue the ongoing regeneration of Wallyford, complementing the anticipated development at St Clements Wells. This development opportunity is adjacent to Gula Flats across Salter's Road and is now under construction.

Wallyford is the focus of an ambitious regeneration scheme promoted by the Council through its Local Plan. The Victory Lane Stadium forms a key component of this ongoing regeneration.

Progress has been made to secure a detailed consent to allow enabling development at Barbachlaw to proceed and thereby fund the completion of the Stadium.

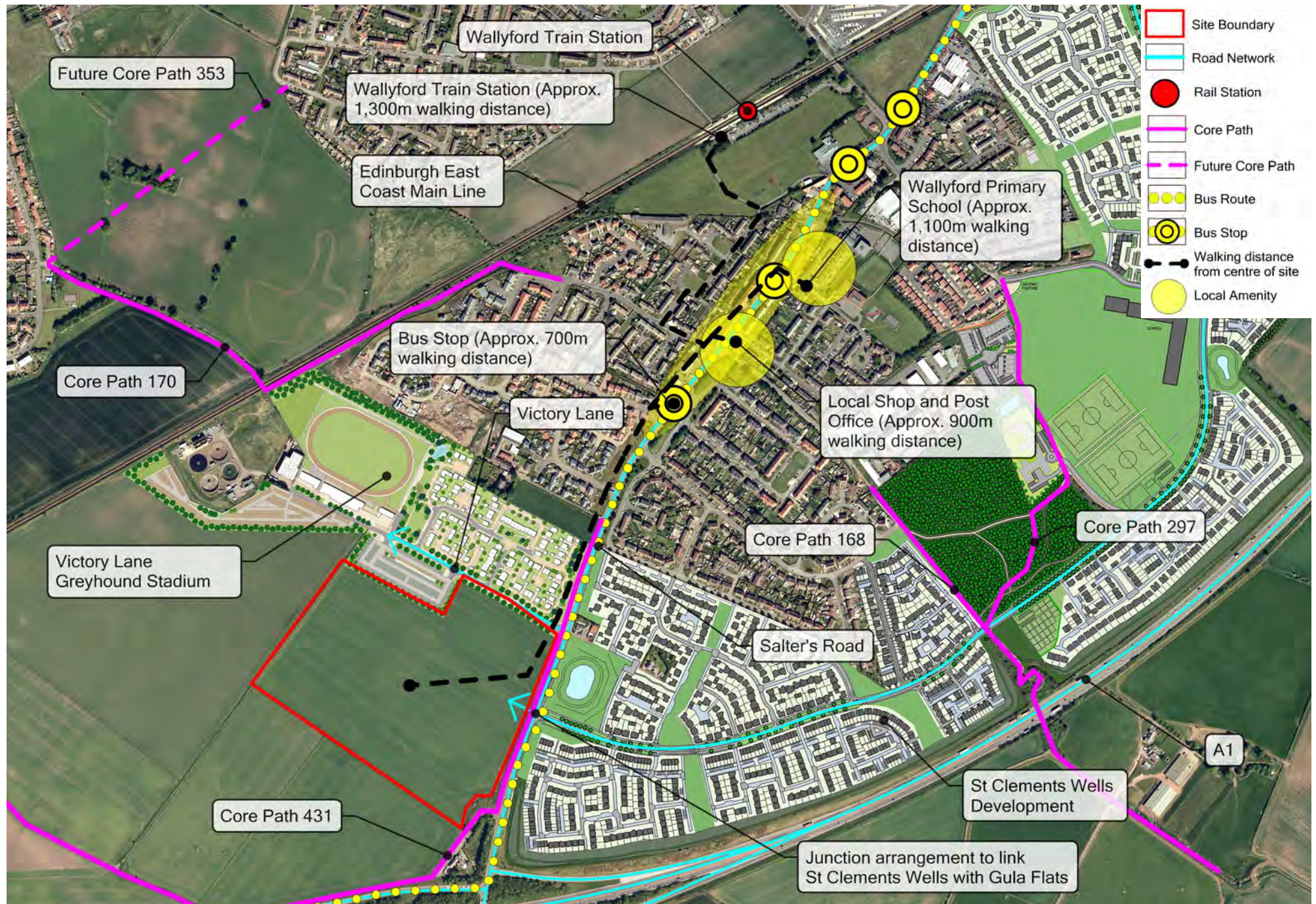
The proposal for Gula Flats represents a further strategic and sustainable development opportunity for Wallyford as a site of 11.8 ha.

Meeting Housing Supply Target

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

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

Sirius Sport & Leisure is committed to developing new homes on this site. This site is immediately effective and the proposal will be developed over a 4 year period from 2018.



The site is located in a sustainable location and has easy access to local facilities

2. Site and Settlement Appraisal

Site Description

The site is close to the Victory Lane Stadium. The Stadium has a large visual presence from the surrounding countryside, the A1 and railway line.

The northern edge is bounded by land approved for residential use and Stadium parking.

The eastern edge is bounded by Salter's Road which is the main thoroughfare through Wallyford. Across Salter's Road is the development approved at St Clements Wells including a new access as shown on the plan opposite.

The southern and western edges are bounded by further arable farm land.

The Council states that *...the site is physically suitable for the proposed use. Adjacent land uses are residential and agricultural and should not present amenity conflicts.*

A farm track runs along the western edge, which connects into a wider footpath network to Musselburgh. The site is adjacent to Core Path 431 on its south eastern boundary.

Site Appraisal

It should be noted that the Site Assessment carried out by the Council is for a site (Ref: PM/MH/HSG067) known as South West Wallyford (over 23 ha).

This substantially bigger site was assessed by the Council in its SEA assessment and not the proposed site at Gula Flats.

This re-appraisal is necessary to identify the actual impacts for this smaller proposal together with the mitigation proposed as part of the design process.

This SEA appraisal for the allocated site is presented as part of the supporting information for this representation.

Accessibility

In the SEA assessment for the site (SEA Ref: South West Wallyford PM/MH/HSG067) the Council states that *...Wallyford is in a highly accessible location in regional terms and closer to major centres of employment than most other East Lothian settlements, and therefore development of this site would be focusing development in the most accessible and sustainable locations.*

Sirius Sport & Leisure agrees with this assessment.

The Council also confirms that the *...site is well positioned to access public transport, active travel routes, as well as local facilities and services.*

The centre site is within 700m of the existing bus stop on Salter's Road which is serviced by the Lothian 44 route which provides a frequent service to Edinburgh.

This service is within an easy walking distance – less than 8 minutes. Wallyford Rail Station is within a walkable distance of 15 minutes (around 1,300m).

All of the local services and facilities are within 900m (10 minute walk) including local shops, existing primary school and library.

This pedestrian connectivity is along established paths which are well lit.

The accessibility of these facilities support the site at Gula Flats as a sustainable location for development.



Victory Lane Stadium



Gula Flats site (left) with the St Clements Wells site on right side of Salter's Road



Access is to be provided from Salter's Road, and from Victory Lane (on the right)

Access

It is proposed that access would be formed from Salter's Road with the junction already approved into the St Clements Wells proposal.

This could be a roundabout or a signalled junction. Any new signals would be linked to the existing signals controlling access onto the A1.

It is also proposed that a further access will be taken from Victory Lane along with a separate pedestrian access to serve the proposal.

It is noted that there are traffic capacity constraints within the Musselburgh area and further consideration is required to establish how these might be mitigated.

Due to the location of Gula Flats close to the A1 interchange, it is not anticipated that the residents within the proposed development will create significant through trips within Musselburgh.

Development at Gula Flats (as a site within the Musselburgh cluster) is ideally located to minimise traffic impacts within Musselburgh.

In relation to the Salter's Road / A1 interchange, this is understood to operate close to capacity at peak times presently, but mitigation is committed at the interchange in association with St Clements Wells.

Accordingly, the choice of Gula Flats as an additional allocation to meet SESplan's housing land requirement will have minimal transport impacts on Musselburgh.

Ecology

The site is not within any areas designated for their international, national or local nature conservation interest.

The site is in agricultural (arable) use and is prime quality land. Most of the greenfield sites promoted by the Council as part of its preferred strategy are prime quality land.

The ecological value of the site is low with the exception of its field boundaries. These field boundaries would be retained and enhanced to meet Council biodiversity requirements.

The provision of gardens and greenspace proposals will enhance the biodiversity of the site.

Education capacity

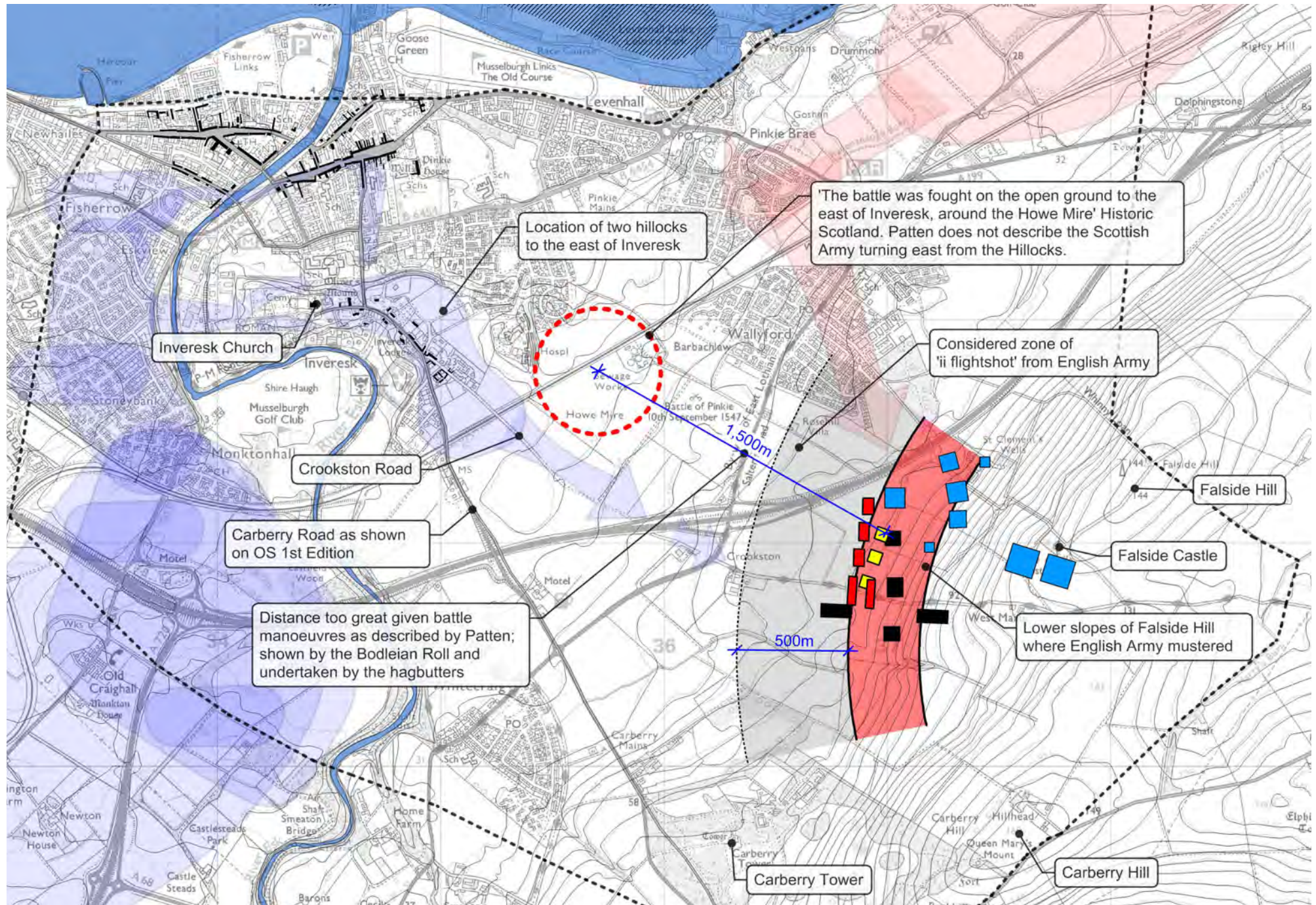
The site is within the catchment of Wallyford Primary School.

The Council states in its SEA assessment that Wallyford Primary School *...has no capacity and is due to be replaced, but may have the ability to expand in future subject to emerging solutions. At secondary level the site would be served by Musselburgh Grammar which is subject to potential options for increasing education capacity in the Musselburgh cluster.*

The Proposed Plan confirms that Wallyford Primary School is due to be replaced with a new primary school located within allocation PROP MH9: *Land at Wallyford*. A new secondary education facility is also proposed at Wallyford to serve the Musselburgh area - PROP MH11: *New Secondary School Establishment*.

Appraisals carried out confirm that the school children from the development can be accommodated in the catchment schools, taking account of the solutions for new education facilities at primary and secondary level presented in the Proposed Plan and its Supplementary Guidance: *Developer Contributions*.

Financial contributions to fund planning obligations as set out in the Council's Draft Supplementary Guidance on *Developer Contributions* will be available from Sirius Sport & Leisure to fund any necessary upgrades to infrastructure in accord with Circular 3/2012.



The Battlefield Inventory by Historic Environment Scotland promotes two locations for the main fighting area - recent metal detecting confirms Crookston as the probable location, south of the A1

3. Battlefield and Heritage Assessment

Recent research highlights that the further evidence provided by Historic Environment Scotland (HES) to support its conclusion that *...the battle was fought on the open ground to the east of Inveresk, around the Howe Mire* is challenged by researchers Dr DH Caldwell; AOC Archaeology and Geddes Consulting.

The evidence referred to by HES does not support a conclusion reached in the Inventory that the location of the battle and the main fighting area was to the east of Inveresk.

Further, the additional metal detecting at Gula Flats has resulted in a lack of battle related finds. This indicates that there is no material archaeological evidence to support the interpretation in the Inventory that the main engagement area was east of Inveresk.

Further, the interpretation offered by HES about the location of the battle continues to be at variance with its own analysis and descriptions reported in the Inventory.

Accordingly, the researchers conclude that the Inventory presents a somewhat confused script about the location of the main engagement between the armies. This confusion is amplified by reference to the Inventory Deployments Map showing the locations of the respective armies.

The location of the English army

The final location of the English army is the key anchor in determining the location of the main fighting area. There is no difference in opinion about its general location between HES and the researchers.

There is convergence of agreement about this location shown in the plan opposite. Dr Caldwell; AOC Archaeology; Geddes Consulting as well as HES are in agreement about its general location.

The English army had mobilised at this location, part on the hill slope and the plain. By this time, the Scots army would have been well south of the open plain, to the east of Inveresk. Indeed, the Inventory text indicates that the Scots army would have been within 500m of the English army.

Distance between Armies

The agreed distance between the armies of less than 500m and the Inventory's identified area of the engagement is fundamentally at variance. The plan opposite confirms that the distance from the English army on the hill slopes to the open fields of Inveresk, near Howe Mire is up to 1,500m.

It is noted that the Inventory text concludes that both armies were only 500m apart at the engagement. The main fighting area must therefore be to the south of the A1 as shown on the plan opposite.

Battle arrays deployed at time of main engagements

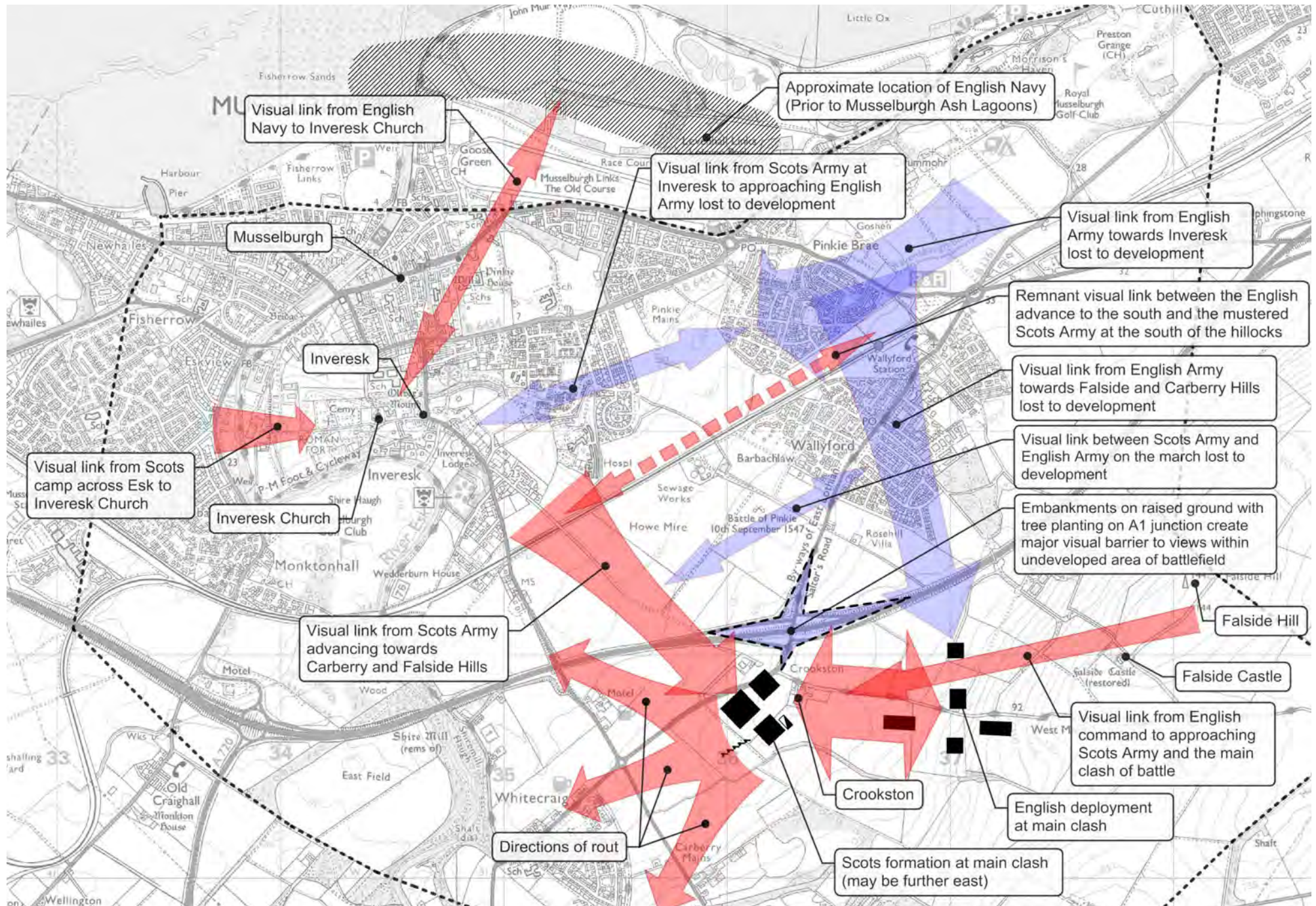
The contemporary accounts of battle by Patten locate the Scottish army to the front of the English army, most likely to the north west of the English battle arrays.

Dr Caldwell's latest research carried out in 2015 about the battle now shows the detail of the battle arrays and movements of both armies up to the main engagement. This confirms how the armies faced each other as the Scots army manoeuvred its battles at the point of engagement with the English army only a short distance away (up to 500m).

Dr Caldwell's interpretation of the movement of each armies' battles in formation provides an invaluable insight to the manoeuvres across the battlefield as well as setting the scale of these individual battles on the battlefield.

There is no difference in opinion about the general disposition of how the respective battles of the Scots and English armies were arrayed.

His research greatly assists in locating the individual battles as well as both armies in the battlefield landscape with the main fighting area to the south of the A1.



Plan showing the Battle manoeuvres described by Patten and an appraisal of the relationships evident across the battlefield

Sequence of manoeuvres across battlefield

An analysis of the battle manoeuvres described, and illustrated in diagrams by Patten has been mapped in the historic landscape of the battlefield. This sequence of manoeuvres leads to the location of both armies to south of the A1, between St Clement's Wells and Crookston.

These manoeuvres and battlefield relationships are set out in the page opposite.

This shows the sequence of battle manoeuvres and visual relationships which are still retained in the modern landscape and those which have been lost over time due to urban development.

The battlefield relationships which have been lost over time to urban and other development are:

- the march of the English army from its camp through Wallyford to its position to face the Scots army;
- the march of the Scots army from its camp to assemble at the two hillocks;
- the Scots army viewing the English army as it made for the hillslopes; and
- the English army viewing the Scots army as it advanced southwards, off the two hillocks as it marched to the hillslopes.

Many of the other relationships can still be appreciated from a series of viewpoints across the battlefield.

The researchers conclude that a major impediment to a proper understanding of the relationships across the battlefield is the major disruption caused by the route of the A1 through the battlefield.

The construction of the A1 has brought about significant change in surrounding ground levels to accommodate its route and the landscaping along its embankments further screen the battlefield relationships. It is a major intrusion to understanding of the battle.

The researchers have sought to fit together the sequence of manoeuvres described by Patten in both text and diagrams. This sequence is further proof that the Scots army did not march to an engagement with the English army at Howe Mire but to Crookston, south of the A1.

The retained relationships in the modern landscape (as shown on the plan opposite) are important as they form the foundation for any future heritage interpretation of the battle, set in the current landscape.

Ongoing metal detecting

A metal detecting survey has been carried out at Crookston which is the focus of the main fighting area, as shown on the plan opposite.

Well over 1,500 metal artefacts have now been collected. These are now undergoing examination to clarify whether these finds relate to the Battle. Some of the finds relating to the period of the Battle include:

- A probable late medieval crotal bell;
- Buttons and Coins;
- Several axe heads;
- Several lead shot;
- Several arrowheads;
- Piece from the rim of a copper alloy, cast laver, with a handle mount in the form of a human bust;
- Embossed copper alloy mounts with Tudor rose designs probably horse fittings/ornamentation;
- Copper alloy mount in the form of an imperial crown;
- Copper alloy buckles;
- Screws with pierced heads, possibly for securing the jaws of a cock on a gunlock;
- Sherds of copper alloy cast vessels; and
- Copper alloy scabbard mount.

These and other finds when analysed, will be the most comprehensive assemblage of the Battle found to date.



Recent finds at Crookston from the battle engagement



Indicative Development Framework for around 170 homes with further employment, leisure and tourism uses.

4. Development Proposal

The Council has prepared a site *Development Brief* and this has been taken into account in preparing this proposal.

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

Up to 170 homes, including 25% of the site's capacity as affordable homes, with employment, leisure and tourism uses can be accommodated on the site subject to further detailed studies.

Working in partnership with the Council, Sirius Sport & Leisure will develop the workshop / studio spaces. All work spaces will be provided with a fibre optic connection providing the potential for the enhancement of East Lothian's digital economy.

The proposed scale of development is appropriate for the southern edge of Wallyford.

Access will be taken from two locations. The Council's *Development Brief* only requires an access from Victory Lane but another connection can be made from Salter's Road. This will enhance the permeability of the proposal.

Pedestrian movement will be prioritised through the proposal. Parking requirements will meet Council's guidelines.

The grain of the new urban form including its integrated greenspaces provides views linking the site to its historical context. Pedestrian connections to adjacent developments at St Clements Wells and Barbachlaw will ensure permeability and integration with these new urban areas.

The greenspace framework along Salter's Road will provide continuity with the existing streetscape and provide a welcoming entrance to Wallyford.

The greenspace framework connects into a wider network of landscape links both existing and proposed. The public open space provided will be accessible to the wider community as well as new residents on the site.

These greenspace proposals will also help enhance local biodiversity measures.

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

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

Other than the addition of a second access road from Salter's Road and clarification on the extent of the site boundary, the proposal complies with the Council's Development Brief for PROP MH13: *Howe Mire, Wallyford*.

It is also in accord with the Council's placemaking agenda, as set out in its Supplementary Guidance.

The Strategic Environmental Assessment (SEA) for the site, undertaken by the Council, has been reviewed, taking this proposal into account. This confirms that this proposal continues to be a sustainable development.

A Statement of Site Effectiveness has been prepared, taking account of the tests in PAN 2/2010. This Statement confirms that the site is effective and will be developed during the initial period of the plan.



Development at Gula Flats has many benefits for Wallyford and fits with the emerging urban framework

5. Benefits for Wallyford

Development at Gula Flats has many benefits for Wallyford and East Lothian.

Sustainable location for further development

The Council agrees that the site is well connected to bus links and to the nearby Wallyford Rail Station. This provides opportunities for sustainable travel to Edinburgh and beyond as well as to surrounding settlements.

The local shops will benefit from the extra population in Wallyford.

The proposals deliver affordable homes

There is an ongoing local housing need in Wallyford, even with the provision of new affordable housing at St Clements Wells. Sirius Sport & Leisure is committed to providing 25% affordable housing in accord with the Council's policy.

Sirius Sport & Leisure would like to transfer land to the Council at nil value for the delivery of affordable homes, or to sell land to an affordable housing provider, if there could be a restriction applied in favour of those with a local connection, as well as in housing need. If this qualification cannot be accepted, serviced land will be delivered in accord with Council policy.

Sirius Sport & Leisure is also willing to provide affordable (low cost home ownership) housing without subsidy to augment the supply of subsidised affordable housing to achieve the agreed overall requirement as necessary.

The proposal delivers jobs

Sirius Sport & Leisure is committed to building workshops and studios. It is anticipated that these buildings can accommodate over 100 new jobs, providing much needed employment opportunities for the local community.

Some of the workshops and studios will be built before occupation of any homes on the site.

These workshops and studios will meet local economic needs of businesses in Wallyford and Musselburgh as the economy improves.

Digital economy

A fibre optic connection to businesses and homes will be incorporated providing broadband speeds of one gigabit per second.

Gula Flats would be one of the first developments in East Lothian to provide fibre direct to both homes and businesses. This will support the development of the digital economy in East Lothian.

Community greenspace

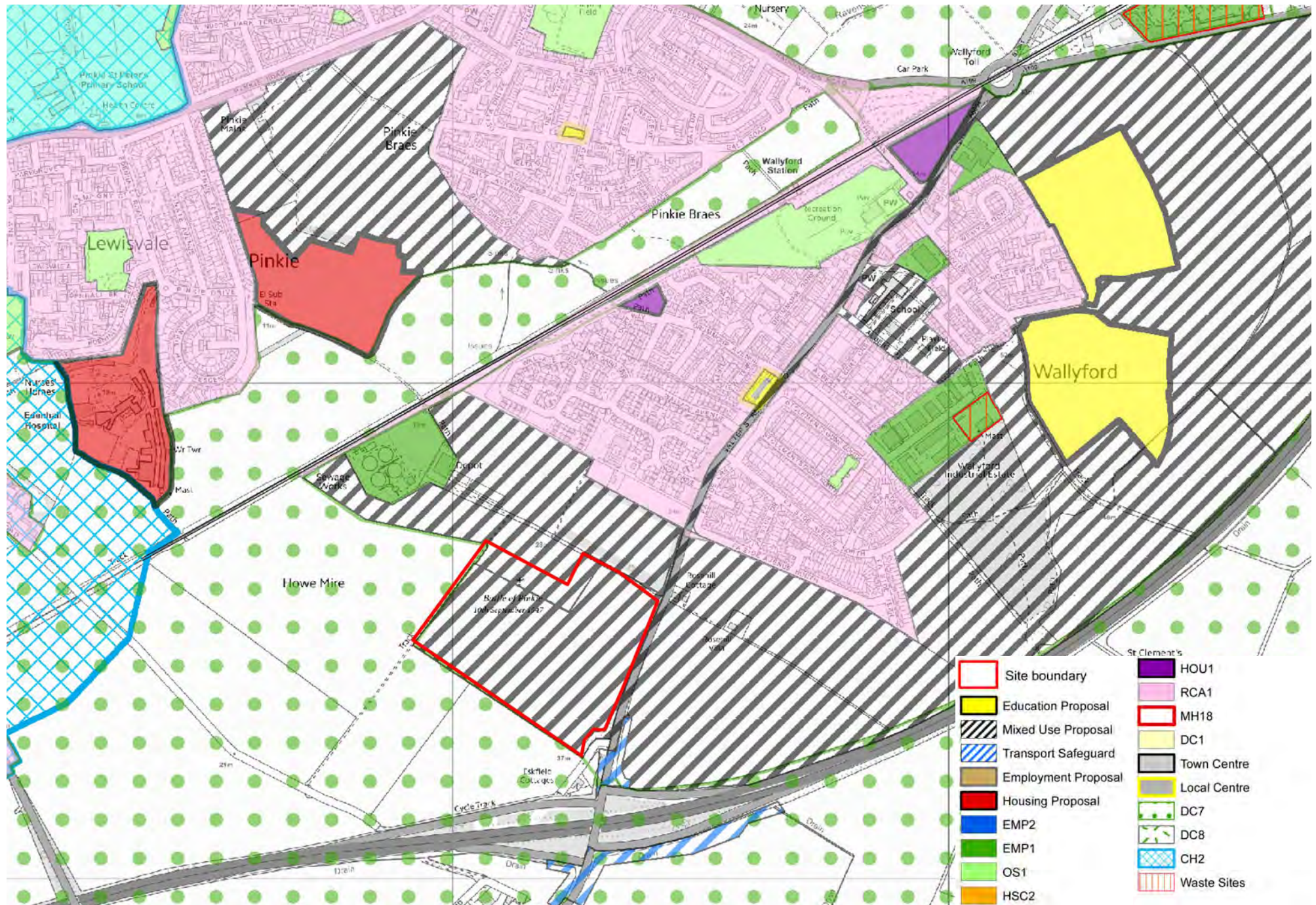
Gula Flats will incorporate community greenspaces, integrating the proposal with adjacent approved developments, its historic context and the surrounding countryside.

Effective site available for development

The site is effective and will help meet the identified strategic housing land requirements in SESplan. A *Statement of Site Effectiveness* has been submitted as part of the representation to the Proposed Plan.

Gula Flats is an effective site and is immediately available for development, including affordable housing as well as workshops and studios. This site would be completed within the period of the LDP.

Mechanisms are proposed for the delivery of both economic and affordable housing uses.



Sirius Sport & Leisure supports the Council's recommendation to allocate this site for mixed use development

6. Recommendation to Council

In its Development Brief, the Council proposes that there is one vehicular point of access which is *...to be taken from Victory Lane*.

The site has a capacity of around 170 homes and other economic uses. More than one access point still complies with Council requirements.

Sirius Sport & Leisure recommends that the Council modifies their Development Brief (PROP MH9: *Land at Wallyford*) to propose two vehicular access locations.

The additional access location should be provided via a new junction on Salter's Road. This would be formed opposite the proposed access to the development under construction. The proposal demonstrates how this can be accommodated.

The site boundary shown on the Development Brief differs from that promoted to the Council. This site only extends to 10.7 ha, which is 1.1 ha less than that promoted to the Council.

The problem is that the Council has unintentionally excluded land from the site because it has drawn the area of the Stadium car parking too large. This car park is already agreed and has Planning Permission.

Sirius Sport & Leisure wishes the site and its area to be shown as presented in this Report.

Development of the site forms a logical extension to Wallyford. Further research confirms that the main fighting area of the Battle of Pinkie is around Crookston to the south of the A1.

This proposal does not impact on the understanding of the Battle of Pinkie. All important relationships remaining in the battlefield are unaffected by this proposal.

Sirius Sport & Leisure recommends that the Council modifies the text in paragraph 2.38 of the Proposed Plan to reflect current knowledge of the Battle of Pinkie.

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

Accordingly, Sirius Sport & Leisure supports the Council's recommendation to allocate this site for mixed use development including up to 170 homes with employment, leisure and tourism uses at Gula Flats, Wallyford.



The Quadrant
17 Bernard Street
Leith
Edinburgh
EH6 6PW

[t] 0131 553 3639

[e] info@geddesconsulting.com
[w] www.geddesconsulting.com

Revision	Status	Prepared	Checked	Date
Version 1	Draft	Shaun Doherty	Bob Salter	02/11/16
Version 2	Final	Shaun Doherty	Phil McLean	04/11/16



This document was prepared by Geddes Consulting.

Geddes Consulting | The Quadrant | 17 Bernard Street | Leith | Edinburgh | EH6 6PW

[t] 0131 553 3639

[e] info@geddesconsulting.com

[w] www.geddesconsulting.com

Gula Flats, Wallyford

Statement of Site Effectiveness

Introduction

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

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

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

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

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

Outcome

Based on the appraisal of the criteria in PAN 2/2010, the proposal at Gula Flats, Wallyford by Sirius Sport & Leisure for a mixed use development including circa 170 homes, employment, leisure and tourism uses is an immediately effective site. This Statement explains how the proposal meets the tests of effectiveness in PAN 2/2010.

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

Appraisal

This conclusion is based on the following analysis.

Criteria	Response	Comment
<p>Ownership: the site is in the ownership or control of a party which can be expected to develop it or to release it for development. Where a site is in the ownership of a local authority or other public body, it should be included only where it is part of a programme of land disposal.</p>	<p>The site is owned by Howard Wallace (Sirius Sport & Leisure). It is immediately available for development.</p> <p>Construction will start once all relevant planning and other consents are secured which are planned for 2017 onwards.</p>	<p>Complies</p>
<p>Physical: the site, or relevant part of it, is free from constraints related to slope, aspect, flood risk, ground stability or vehicular access which would preclude its development. Where there is a solid commitment to removing the constraints in time to allow development in the period under consideration, or the market is strong enough to fund the remedial work required, the site should be included in the effective land supply.</p>	<p>Adverse development factors give rise to abnormal development costs which can affect the viability of a site and hence its effectiveness.</p> <p>Appraisals of the site have been carried out to establish whether there any constraints to development and what measures are necessary to enable development on the site. These appraisals also determine whether the site is viable for future development.</p> <p>The following assessments will be undertaken relating to the physical aspects of the site's future development:</p> <ul style="list-style-type: none"> • Engineering Assessment with Drainage Report, Mining Risk Assessment, and Flood Risk Assessment; • Transport Assessment; • Desk-based Archaeological Assessment; • Heritage Impact Assessment; • Arboricultural Assessment; • Ecological Assessment; • Landscape and Visual Impact Assessment; • Air Quality Impact Assessment; 	<p>Complies</p>

- Environmental Noise Impact Assessment.

The following comments are highlighted:

- The topography of the site can accommodate the necessary gradients and development platforms for the proposal without extensive ground modelling.
- The development area is not subject to fluvial flood risk as highlighted in SEPA's mapping. The pluvial flooding on the site as identified by SEPA will be resolved by the proposed SuDS measures. The SuDS measures ensures that run-off from surface water drainage will be discharged at greenfield rates. A detention basin and other SuDS measures in the west of the site will regulate water discharge.
- The site can accommodate the scale of development proposed. The Council's *Development Brief* requires access off Victory Lane. A further access on Salter's Road is proposed. Additional path connections are proposed from Salter's Road.
- Cultural heritage interests within the site have been assessed. The metal detecting survey for the site confirmed that there are no finds attributable to the time of the Battle of Pinkie. This doesn't support the conclusion that this site was part of the main fighting area. Research of the battle manoeuvres confirms that this site was not part of the main fighting area which is now established as south of the A1. Accordingly, development of the site does not undermine the understanding of the battle. The proposal will not impact on the cultural and visual relationships of the battle.
- The site is used for arable purposes and is of low ecological value. Where possible, existing hedges will be retained. Greenspace proposals along with gardens will enhance the biodiversity of the site.
- The site has the landscape capacity to accommodate development without significant adverse impacts. Tree planting will be in accord with the Council's *Development Brief* for PROP MH13: *Howe Mire, Wallyford*.

There are no physical constraints on this site to either prevent development in accordance with the Council's proposed *Development Brief* or require engineering works which will generate unacceptable abnormal costs.

<p>Contamination: previous use has not resulted in contamination of the site or, if it has, commitments have been made which would allow it to be developed to provide marketable housing.</p>	<p>The site is in arable agricultural use and is a greenfield site. The site is prime agricultural land.</p> <p>There are no known contamination issues present on the site.</p>	<p>Complies</p>
<p>Deficit Funding: any public funding required to make residential development economically viable is committed by the public bodies concerned;</p>	<p>Sirius Sport & Leisure is promoting the development of this site for new homes and employment, leisure and tourism uses. The development principles are in accord with the Council's requirements.</p> <p>No funding from the public sector is required to make the development viable, except for the provision of subsidy for affordable housing. Sirius Sport & Leisure is committed to providing 25% affordable housing in accord with the Council's policy.</p> <p>Sirius Sport & Leisure would like to transfer land to the Council at nil value for the delivery of affordable homes, or to sell land to an affordable housing provider, if there could be a restriction applied in favour of those with a local connection, as well as in housing need. If this qualification cannot be accepted, the serviced land will be delivered in accord with Council policy.</p> <p>Sirius Sport & Leisure is also willing to provide affordable (low cost home ownership) housing without subsidy to augment the supply of subsidised affordable housing to achieve the agreed overall requirement as necessary.</p>	<p>Complies</p>

<p>Marketability: the site, or a relevant part of it, can be developed in the period under consideration;</p>	<p>East Lothian is a prime housing market area. There is an ongoing and significant demand for a full range of market housing in the locality as well as affordable housing needs. There is considerable interest from house builders to develop in this location as this is a prime location for private housing.</p> <p>This is confirmed by the regional Housing Need & Demand Assessment (HNDA) and the Council’s Local Housing Strategy. The Council has allocated sites in the locality as part of its development strategy for the Proposed LDP which recognises the area’s marketability for housing.</p> <p>Given the outstanding shortfall in the supply of effective housing land, Sirius Sport & Leisure expects a house builder to be constructing and selling around 30 homes annually on the site, together with the Council or a housing association to deliver 43 affordable homes.</p> <table border="1" data-bbox="577 616 1727 775"> <thead> <tr> <th>Gula Flats, Wallyford</th> <th>16/17</th> <th>17/18</th> <th>18/19</th> <th>19/20</th> <th>20/21</th> <th>21/22</th> <th>22/23</th> <th>22/24</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Market</td> <td>0</td> <td>0</td> <td>30</td> <td>33</td> <td>34</td> <td>30</td> <td>0</td> <td>0</td> <td>127</td> </tr> <tr> <td>Affordable</td> <td>0</td> <td>0</td> <td>0</td> <td>20</td> <td>23</td> <td>0</td> <td>0</td> <td>0</td> <td>43</td> </tr> <tr> <td>Total</td> <td>0</td> <td>0</td> <td>30</td> <td>53</td> <td>57</td> <td>30</td> <td>0</td> <td>0</td> <td>170</td> </tr> </tbody> </table>	Gula Flats, Wallyford	16/17	17/18	18/19	19/20	20/21	21/22	22/23	22/24	Total	Market	0	0	30	33	34	30	0	0	127	Affordable	0	0	0	20	23	0	0	0	43	Total	0	0	30	53	57	30	0	0	170	<p>Complies</p>
Gula Flats, Wallyford	16/17	17/18	18/19	19/20	20/21	21/22	22/23	22/24	Total																																	
Market	0	0	30	33	34	30	0	0	127																																	
Affordable	0	0	0	20	23	0	0	0	43																																	
Total	0	0	30	53	57	30	0	0	170																																	
<p>Infrastructure: the site is either free of infrastructure constraints, or any required infrastructure can be provided realistically by the developer or another party to allow development;</p>	<p>Preliminary investigations confirm the following:</p> <ul style="list-style-type: none"> • Gas, electricity and telecoms can be provided; • Foul drainage from the site can be accommodated; and • Water supply to the site can be provided. <p>Infrastructure of the required capacity can be made available, subject to undertaking a DIA and WIA with Scottish Water. Infrastructure upgrades to the water supply is already planned by Scottish Water.</p> <p>Appraisals carried out confirm that the school children from the development can be accommodated in the catchment schools, taking account of the solutions for new education facilities at primary and secondary level presented by the Council in the Proposed Plan and its Supplementary Guidance: <i>Developer Contributions</i>. Financial contributions to fund planning obligations will be available from Sirius Sport & Leisure to fund any upgrades to infrastructure.</p>	<p>Complies</p>																																								

<p>Land Use: housing is the sole preferred use of the land in planning terms, or if housing is one of a range of possible uses other factors such as ownership and marketability point to housing being a realistic option.</p>	<p>As part of the site is residential development, it will provide a full range of housing tenure to create a socially inclusive development.</p> <p>The proposal complies with the Council's <i>Development Brief</i> for PROP MH13: <i>Howe Mire, Wallyford</i> with amendments proposed for a second access and correct delineation of the site boundary.</p>	<p>Complies</p>
--	--	------------------------

**East Lothian Local Development Plan
Assessment of the Housing Land Supply**

On behalf of



November 2016

Prepared by :



The Quadrant
17 Bernard Street
Leith
Edinburgh
EH6 6PW

[t] 0131 553 3639

[e] info@geddesconsulting.com

[w] www.geddesconsulting.com

Document Control and Approval

Revision	Status	Prepared	Approved	Date
V1	Draft for Comment	Stuart Salter	Bob Salter	31 st October 2016
V2	Final	Stuart Salter	Bob Salter	4 th November 2016

Contents

1.0	Introduction	1
2.0	Scottish Planning Policy and National Guidance	3
3.0	SESplan SDP	5
4.0	East Lothian Local Development Plan	7
5.0	Recommendations for Proposed Plan	12

1.0 Introduction

- 1.1. There are issues regarding the methodology adopted by East Lothian Council (the Council) to define the housing supply target, housing land requirement and the programme of completions for the proposed allocations for the Local Development Plan (LDP). These issues need to be addressed by the Council prior to submission of the LDP to Examination.
- 1.2. This *Assessment of the Housing Land Supply* (the Assessment) examines the methodology and assumptions adopted in the LDP, as set out in the Technical Note 1 *Planning for Housing*.
- 1.3. The Council's proposed development strategy will not meet the requirements as set out by SESplan Strategic Development Plan (SDP) or Scottish Planning Policy (SPP) as well as the approved guidance in PAN 2/2010 *Affordable Housing and Housing Land Audits*.
- 1.4. The analysis in this Assessment confirms the proposed development strategy:
- assumes many of the proposed allocations will begin to be built in 2017/18, and this general assumption is not supported by Homes for Scotland;
 - does not identify the housing land requirement 10 years post adoption to 2028; and
 - the housing land requirement for the period to 2019 is not met in full.
- 1.5. This Assessment confirms that there is a shortfall in the scale of new housing allocations required in the LDP to meet the housing land requirement in full.
- 1.6. Further effective housing land releases are needed in support of the Council's proposed development strategy.
- 1.7. For the purposes of the LDP, Table HOU2 *Housing Land Requirement* should be replaced with the following tables below:

Table HOU2 Housing Land Requirement

Planning Periods	2009-2019	2019-2024	2024 - 2028
Housing Supply Target	6,250	3,800	1,910
Housing Land Requirement (20%)	7,500	4,560	2,292
Dwelling Completions (2009 to 2015)	2,038	0	0
Contribution from the Established Land Supply	2,670	2,143	0
Contribution from Future Windfall Sites	84	105	56
Loss of Supply to Dwelling Demolitions	-15	-8	-6
Contribution from Blindwells	0	291	388
Sub-Total Housing Land Supply	4,777	2,531	444
Contribution required from New Allocations	2,723	2,029	1,848
Updated Contribution from New Allocations	790	3,725	1,485
Shortfall / Surplus	-1,933	+1,696	-364

- 1.8. Further additional allocations are required to be allocated in the LDP. Overall, there is a shortfall of 601 homes over the timescale of the LDP from 2009 to 2028. However, in the period to 2019, a significant shortfall of 1,933 homes is expected to emerge.
- 1.9. The Council's proposed allocation of 7,285 homes is insufficient in terms of programming to meet the scale of allocation required. Further effective housing land capable of accommodating additional homes is required in the short term.
- 1.10. The consequence of failing to make these additional allocations is that the Council will not be maintaining a 5 year effective housing land supply from the adoption of the LDP. This will mean that the housing land supply policies in the LDP will be considered out of date in accord with SPP paragraph 125. In these circumstances, a presumption in favour of development that contributes to sustainable development will apply through the development management process as set out in SPP paragraphs 29 and 32 to 35.
- 1.11. Should the Council not identify additional allocations to maintain a 5 year effective housing land supply at all times from the point of adoption, a Hearing Session will be required as part of the Examination process to resolve matters.

2.0 Scottish Planning Policy and National Guidance

Scottish Planning Policy

- 2.1 SPP (June 2014) sets out the policy requirements in paragraphs 109 to 125 for both development plans and development management for *Enabling the Delivery of New Homes*.
- 2.2 The policy principles which have a direct consequence on the Council's preferred development strategy and are summarised in SPP, paragraph 110:
- Policy Principles**
- 110. The planning system should:*
- *identify a generous supply of land for each housing market area within the plan area to support the achievement of the housing land requirement across all tenures, maintaining at least a 5-year supply of effective housing land at all times;*
 - *enable provision of a range of attractive, well-designed, energy efficient, good quality housing, contributing to the creation of successful and sustainable places; and*
 - *have a sharp focus on the delivery of allocated sites embedded in action programmes, informed by strong engagement with stakeholders.*
- 2.3 The delivery mechanism should include partnership working with a range of partners including the delivery sector such as Homes for Scotland as set out in paragraph 111.
- 2.4 LDPs should be based on a robust and credible HNDA. It should adopt the housing supply target based on evidence from the HNDA for both affordable and market sector housing. As paragraph 115 explains, this housing supply target is a policy view of the number of homes to be delivered over the development plan period but must properly reflect the HNDA estimate of housing demand and be supported by compelling evidence. The choice of the housing supply target should also be reflected in the local housing strategy.
- 2.5 In paragraph 116, the housing supply target will be based on the number of homes to be built in the plan period together with a margin of 10% to 20% to ensure a generous land supply is provided. The exact extent of the margin depends on local circumstances and requires a robust explanation. This then establishes the housing land requirement for the LDP.
- 2.6 The application of the 'generosity allowance' translates the housing supply target to the housing land requirement.
- 2.7 Sources of land supply to meet the housing land requirement are referred to in paragraph 117. These include the established land supply, proposed new allocations and a proportion of windfall development which can be justified.
- 2.8 This housing supply target should be set out as well as the housing land requirement up to year 10. This housing supply target should be met in full (paragraph 120). In addition beyond year 10 and up to year 20, the LDP should provide an indication of the possible scale and location of housing by local development plan area.
- 2.9 This process is helpfully set out in Diagram 1 on page 30 of SPP.

2.10 SPP requires planning authorities to maintain a 5 year effective land supply at all times, using the housing land audit process as a monitoring tool measure whether this requirement is being met (paragraph 123).

2.11 Where a shortfall in the 5 year effective land supply emerges, paragraph 125 sets out that development plan policies for the supply of housing land will not be considered up to date and reference to paragraphs 32 to 35 of SPP is made. This is a reference to the development management process and how the issue of prematurity is to be addressed with a presumption in favour of sustainable development.

National Guidance

2.12 In considering the implications of these paragraphs set out in SPP, their interpretation needs to have regard for the existing guidance in PAN2/2010, specifically:

- factors which determine whether a site is effective or not (paragraph 55);
- restricting the proportion of effective land to be included to that which can be built in the plan period (paragraph 56); and
- assessing the amount of effective housing land using the housing land audit process (paragraph 57).

2.13 Further, Scottish Government's response to the Review of Planning indicated that Planning and Architecture Division (PAD) will be reducing their input to current development plans. A Service Standard was published on 16th August 2016 outlining how PAD will input to development plans from September 2016.

2.14 An accompanying note was prepared to aide Planning Authorities in preparing LDPs. On matters relating to *New Homes*, Scottish Government requires the following to be set out in the LDP:

- Plans should use the same terminology as used in the SPP;
- Plans should set out figures, preferably in a table, identifying:
 - HNDA estimates;
 - Housing Supply Target for each Housing Market Area. This should be separated into market and affordable sector;
 - The percentage of generosity, and a summary of the reason for this; and
 - The Housing Land Requirement.
- Plans should set out what approach would be taken where an annual Housing Land Audit indicates there is a shortfall in the 5 year effective housing land supply; and
- Plans should consider the level of affordable housing contribution which can realistically be delivered. The level of affordable housing required as a contribution should generally be no more than 25% of the total number of houses.

2.15 Accordingly, the LDP may require modification to take account of these matters prior to Examination.

3.0 SESplan SDP

3.1 In approving SESplan SDP, Scottish Ministers set out a requirement for Supplementary Guidance in respect of Policy 5 *Housing Land* to identify the housing land requirement to be met by the local development plans for the periods 2009 to 2019 and 2019 to 2024.

3.2 The Supplementary Guidance has now been approved by the Scottish Ministers subject to modification. The following sentence should be deleted from paragraph 3.13:

Member authorities will base their calculation of the five year land supply on the period 2009 - 2024, taking into consideration housing completions.

3.3 The SESplan Joint Committee considered the matter at its meeting on 30th June 2014 and recommended to the member authorities that the guidance be adopted with the modification

3.4 Policy 5 states that:

...Supplementary guidance will be prepared to provide detailed further information for Local Development Plans as to how much of that requirement should be met in each of those six areas, both in the period 2009 to 2019 and in the period 2019 to 2024.

...Subject to any justifiable allowance for anticipated house completions from 'windfall' sites, and for demolitions of existing housing stock, Local Development Plans will allocate sufficient land which is capable of becoming effective and delivering the scale of the housing requirements for each period, which will be confirmed in the supplementary guidance.

...Those existing housing sites which are assessed as being constrained, but also capable of delivering housing completions in the period 2024 to 2032, should be safeguarded for future housing development.

3.5 It is clear from Policy 5 that the housing land requirement for East Lothian is as set out in the Supplementary Guidance.

3.6 The SDP and its Supplementary Guidance was approved under SPP (2010). SPP (2014) has now been published and requires a housing supply target to be identified.

3.7 The Examination of the Edinburgh Proposed Plan concluded that the housing land requirement as set out in the Supplementary Guidance is now the housing supply target. Appropriately, a generosity allowance of between 10 - 20% will be added to the target to provide a housing land requirement.

3.8 Therefore the housing supply target for East Lothian is set out in the table below:

Local Development Plan	2009-2019	2019-2024
East Lothian	6,250	3,800

Source: Supplementary Guidance, Table 3.1 Housing Land Requirement by Local Development Plan Area

3.9 For the period beyond 2024, the housing supply target is set out in the table below:

Local Development Plan	2024 - 2032
East Lothian	3,820

Source: Supplementary Guidance (Technical Note), Table 3.1 Estimate of Need and Demand for Housing

3.10 According to SPP (paragraph 115), the housing supply target for East Lothian is as follows:

Local Development Plan	2009-2019	2019-2024	2024 - 2032
East Lothian	6,250	3,800	3,820

Source: Supplementary Guidance

3.11 It can be concluded that the SDP has adopted the findings of the HNDA and therefore the housing supply target as set out in paragraph 115 of SPP. This housing supply target should now be adopted by the Council for Local Development Plan purposes subject to application of the generosity allowance.

3.12 According to the HNDA and the Supplementary Guidance, most of the need and demand will arise in the period to 2019. It is therefore imperative that the finalised development strategy in the adopted LDP is capable of releasing the scale of effective sites needed in the short term. There needs to be no doubt about the effectiveness of the allocated sites in the LDP to deliver at least 6,250 homes by 2019.

3.13 SESplan Policy 6 *Housing Land Flexibility* requires that:

Each planning authority in the SESplan area shall maintain a five years' effective housing land supply at all times. The scale of this supply shall derive from the housing requirements for each Local Development Plan area identified through the supplementary guidance provided for by Policy 5. For this purpose planning authorities may grant planning permission for the earlier development of sites which are allocated or phased for a later period in the Local Development Plan.

3.14 Each planning authority in the SESplan area shall maintain a five year effective housing land supply at all times otherwise the development plan policies about the supply of housing land will not be considered up to date (SPP, paragraph 125).

3.15 As set out in paragraph 119, SPP requires that the emerging LDP should allocate a range of sites which are effective or are expected to be effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected date of adoption.

3.16 Further, the development strategy proposed in the emerging LDP should provide for a minimum of a 5 year effective land supply at all times.

4.0 East Lothian Local Development Plan

Setting the Housing Supply Target

- 4.1 The Council considers that SPP (2010), the SESplan Examination Report as well as the Supplementary Guidance do not require the housing land requirement set for East Lothian to be increased by a further generosity allowance of 10 – 20% in the preparation of the LDP (Technical Note 1, paragraph 4.1 to 4.6)..
- 4.2 This is contrary to the findings of the Edinburgh LDP Examination Report which supported the housing land requirement being defined as the housing supply target as well as a generosity allowance added to this figure.
- 4.3 The Council will note that this methodology has also been adopted in the Glasgow & the Clyde Valley SDP area for all adopted LDPs post SPP (2014).
- 4.4 In all instances, this methodology was considered appropriate given the passage of time from the approved SDP to the present.
- 4.5 The Council is also required to identify the housing supply target 10 year post adoption. With the expected date of adoption 2018, the Council is required to identify the housing supply target from 2024 to 2028, as well as the SESplan periods 2009 to 2019 and 2019 to 2024.
- 4.6 Using the evidence set out in the Supplementary Guidance, this equates to 1,910 homes from 2024 to 2028.
- 4.7 The housing supply target for East Lothian is set out in the table below:

Planning Periods	2009-2019	2019-2024	2024 - 2028
Housing Supply Target	6,250	3,800	1,910

- 4.8 Accordingly the Council's Table HOU2 *Housing Land Requirement* should be modified to reflect the outcomes set out in the table above.

Setting the Housing Land Requirement

- 4.9 The housing supply target is set out in the Glossary for SPP which explains that *...it is the number of homes to be built.*
- 4.10 The housing land requirement is therefore the housing supply target **plus** a generosity allowance of between 10% and 20%. The purpose of identifying a housing land requirement is to allocate sufficient effective housing land to meet the housing supply target in full.
- 4.11 The Council has identified a generosity allowance of 23% over the period 2009 to 2024. However, this represents 10% in the first period, 2009 to 2019, and 43% in the second period, 2019 to 2024. It is noted that this was established by identifying a range of suitable land for housing and the generosity level was calculated thereafter. This is due to supply led approach to determining generosity.
- 4.12 At present, the Council's adopted methodology to select the generosity allowance of 23% in the LDP is **contrary** to the requirements SPP as well as recently published note by Scottish Government.

4.13 SPP expects that ...*the requirement for each housing market area* is met in full (paragraph 118). This is an **overall** housing requirement to be met in full.

4.14 The housing land requirement for the LDP adopting a generosity allowance of 20% is set out in the table below:

Planning Periods	2009-2019	2019-2024	2024 - 2028
Housing Land Requirement (20%)	7,500	4,560	2,292

4.15 Based on a generosity allowance of 20%, the housing land requirement to plan for is 7,500 homes from 2009 to 2019; 4,560 homes from 2019 to 2024 and 2,292 homes from 2024 to 2028.

4.16 Accordingly the Council's Table HOU2 *Housing Land Requirement* should be modified to reflect the outcomes set out in the table above.

Identifying the Contribution from Dwelling Completions

4.17 The Council has identified that there were 2,038 homes completed in the period from 2009 to 2015. This is set out in the table below:

Planning Periods	2015-2019	2019-2024	2024 - 2028
Dwelling Completions (2009 to 2015)	2,038	0	0

Identifying the Contribution from the Established Land Supply

4.18 As set out in the Technical Note 1, the Council considers that the 2015 Housing Land Audit provides the baseline for the contribution from the established land supply, including small sites.

4.19 The contribution from the established land supply for the LDP is set out in the table below:

Planning Periods	2015-2019	2019-2024	2024 - 2028
Contribution from the Established Land Supply	2,670	2,143	0

4.20 Based on the 2015 Housing Land Audit, the contribution from the established land supply is 2,670 homes from 2009 to 2019 and 2,143 homes from 2019 to 2024. There are no homes programmed from 2024 to 2028.

4.21 We note that 2016 Housing Land Audit will be agreed with Homes for Scotland and this should form the basis of the contribution from the established land supply for the LDP Examination.

4.22 Accordingly the Council's Table HOU2 *Housing Land Requirement* should be modified to reflect the outcomes set out in the table above.

Identifying the Contribution from Future Windfall Sites

4.23 The Council has identified a contribution of 299 homes from future windfall sites from 2009 to 2032.

4.24 The LDP is required only to identify a contribution to 2028 – 10 years post adoption.

4.25 It should be noted that as the baseline is the 2015 Housing Land Audit, windfall assumption will begin in 2015.

4.26 As set out in Technical Note 1 (paragraph A1.24), the contribution from Future Windfall Sites is set out in the table below:

Planning Periods	2015-2019	2019-2024	2024 - 2028
Contribution from Future Windfall Sites	84	105	56

4.27 The contribution from future windfall sites is 84 homes from 2009 to 2019; 105 homes from 2019 to 2024; and 56 homes from 2024 to 2028.

4.28 Accordingly the Council's Table HOU2 *Housing Land Requirement* should be modified to reflect the outcomes set out in the table above.

Loss of Supply to Dwelling Demolitions

4.29 The Council has identified a loss of 35 homes due to demolitions from 2009 to 2032.

4.30 The LDP is required only to identify a contribution to 2028 – 10 years post adoption.

4.31 As set out in Technical Note 1 (paragraph A1.31), the loss of supply from demolitions is set out in the table below:

Planning Periods	2015-2019	2019-2024	2024 - 2028
Loss of Supply to Dwelling Demolitions	15	8	6

4.32 The loss of supply to dwelling demolitions is 15 homes from 2009 to 2019; 8 homes from 2019 to 2024; and 6 homes from 2024 to 2028.

4.33 Accordingly the Council's Table HOU2 *Housing Land Requirement* should be modified to reflect the outcomes set out in the table above.

Contribution from Blindwells

4.34 The Council has separated Blindwells' contribution from established land supply. A programme of completions for Blindwells is set out in Technical Note 1 (Appendix 2).

4.35 The Council's expected contribution from Blindwells is set out in the table below:

Planning Periods	2015-2019	2019-2024	2024 - 2028
Contribution from Blindwells	0	291	388

4.36 We note that 2016 Housing Land Audit will be agreed with Homes for Scotland and this should form the basis of the contribution from the established land supply for the LDP Examination.

4.37 Accordingly the Council's Table HOU2 *Housing Land Requirement* should be modified to reflect the outcomes set out in the table above.

Identifying the Scale of Allocations Required

4.38 Based on a 20% generosity allowance, the process and information to identify the scale of allocations required for the East Lothian LDP is set out in the table below:

Planning Periods	2009-2019	2019-2024	2024 - 2028
Dwelling Completions (2009 to 2015)	2,038	0	0
Contribution from the Established Land Supply	2,670	2,143	0
Contribution from Future Windfall Sites	84	105	56
Loss of Supply to Dwelling Demolitions	15	8	6
Contribution from Blindwells	0	291	388

Sub-Total Housing Land Supply	4,777	2,531	444
--------------------------------------	--------------	--------------	------------

4.39 The total housing land supply is 4,777 homes from 2009 to 2019; 2,531 homes from 2019 to 2024; and 444 homes from 2024 to 2028.

4.40 Subtracting the total housing land supply from the housing land requirement will identify the scale of proposed allocations required for the LDP. This is set out in the table below:

Planning Periods	2009-2019	2019-2024	2024 - 2028
Housing Land Requirement (20%)	7,500	4,560	2,292
Sub-Total Housing Land Supply	4,777	2,531	444
Contribution required from New Allocations	2,723	2,029	1,848

4.41 The contribution required from new allocations is 2,723 homes from 2009 to 2019; 2,029 homes from 2019 to 2024; and 1,848 homes from 2024 to 2028.

4.42 Comparing these figures with the Council's contribution set out in Table HOU2 *Housing Land Requirement*, additional allocations will be required. This is set out in the table below:

Planning Periods	2009-2019	2019-2024	2024 - 2028
Contribution required from New Allocations	2,723	2,029	1,848
Council's Contribution	2,115	2,906	1,204
Shortfall / Surplus	-608	+877	-644

4.43 The total additional allocations required to be allocated in the LDP is 608 homes over the period to 2019, with a further 644 homes required in the period beyond 2024.

4.44 Over the whole time period of the LDP from 2009 to 2028, there is a shortfall of 375 homes.

4.45 The Council's proposed allocations are therefore insufficient to meet the scale of allocations required. This Assessment confirms that an additional 608 homes are required over the LDP period to 2019.

Identifying the Programming of Proposed Allocations

4.46 The Council is encouraging proposed allocations to be determined in advance of adoption of the LDP. It is noted that the Council has programmed many of the proposed allocations to begin on site in 2017/18. This is optimistic and unrealistic.

4.47 Technical Note 1 (Appendix 1 and 2) should amend the programming of proposed allocations to begin in 2018/19 rather than 17/18. This would be appropriate to house builders and Homes for Scotland.

4.48 The resultant effect of this movement on the programming in Table HOU2 *Housing Land Requirement* is set out in the table below:

Planning Periods	2009-2019	2019-2024	2024 - 2028
Contribution from New Allocations	790	3,725	1,485

4.49 The updated contribution from new allocations is 790 homes from 2009 to 2019; 3,725 homes from 2019 to 2024; and 1,485 homes from 2024 to 2028.

4.50 Comparing the contribution required with this updated Council's contribution, additional allocations will be required. This is set out in the table below

Planning Periods	2009-2019	2019-2024	2024 - 2028
Contribution required from New Allocations	2,723	2,029	1,848
Updated Council's Contribution	790	3,725	1,485
Shortfall / Surplus	-1,933	+1,696	-364

4.51 The total additional allocations required to be allocated in the LDP is 1,933 homes over the period to 2019, with a further 364 homes required in the period beyond 2024.

4.52 Over the whole time period of the LPD from 2009 to 2028, there is a shortfall of 601 homes.

4.53 The Council's proposed allocations are therefore insufficient to meet the housing land requirement in full. This Assessment confirms that an additional 1,933 homes are required over the LDP period to 2019.

4.54 Accordingly the Council's Table HOU2 *Housing Land Requirement* should be modified to reflect the outcomes set out in the table above.

Draft 2016 Housing Land Audit

4.55 The draft 2016 Housing Land Audit has to be agreed with Homes for Scotland.

4.56 Subject to commentary from Homes for Scotland, the adopted 2016 Housing Land Audit will form the basis for the LDP Examination.

5.0 Recommendations for Proposed Plan

- 5.1 The Council's proposed development strategy as set out in the LDP does not comply with the requirements of SPP.
- 5.2 The methodology for identifying the scale of allocations required to meet the housing land requirement in full is incorrect.
- 5.3 For the purposes of the LDP, Table HOU2 *Housing Land Requirement* should be replaced with the following tables below:

Table HOU2 *Housing Land Requirement*

Planning Periods	2009-2019	2019-2024	2024 - 2028
Housing Supply Target	6,250	3,800	1,910
Housing Land Requirement (20%)	7,500	4,560	2,292
Dwelling Completions (2009 to 2015)	2,038	0	0
Contribution from the Established Land Supply	2,670	2,143	0
Contribution from Future Windfall Sites	84	105	56
Loss of Supply to Dwelling Demolitions	-15	-8	-6
Contribution from Blindwells	0	291	388
Sub-Total Housing Land Supply	4,777	2,531	444
Contribution required from New Allocations	2,723	2,029	1,848
Updated Contribution from New Allocations	790	3,725	1,485
Shortfall / Surplus	-1,933	+1,696	-364

- 5.4 The total additional allocations required to be allocated in the LDP is 601 homes over the total plan period from 2009 to 2028. In the period to 2019, a shortfall of 1,933 homes is expected to emerge.
- 5.5 The Council's proposed allocation of 7,285 homes is insufficient to meet the scale of allocations required. Further effective housing land capable of accommodating additional homes is required in the short term.
- 5.6 The consequence of failing to make these additional allocations is that the Council will not be maintaining a 5 year effective housing land supply from the adoption of the LDP. This will mean that the housing land supply policies in the LDP will be considered out of date in accord with SPP paragraph 125. In these circumstances a presumption in favour of development that contributes to sustainable development will apply through the development management process as set out in SPP paragraphs 29 and 32 to 35.
- 5.7 Should the Council not identify additional allocations to maintain a 5 year effective housing land supply at all times from the point of adoption, a Hearing Session will be required as part of the Examination process to resolve matters.

Gula Flats, Wallyford (SEA Ref: PM/MH/HSG067 South West Wallyford) SEA Site Assessment

- 1.1 The East Lothian Local Development Plan (LDP) Environmental Report Appendices contain detailed site assessments for all sites considered for inclusion in the LDP.
- 1.2 Site Assessments were undertaken by the Council at Main Issues Report (MIR) stage for around 100 sites. These were sites submitted at Call for Sites stage, plus a number of additional sites. The Site Assessments carried out at MIR stage have been republished at the current Proposed Plan stage as Appendices to the *Draft Environmental Report*.
- 1.3 *Proposed Local Development Plan Environmental Report Appendix 5: Musselburgh Area Site and Strategic Environmental Assessments* sets out the site assessment criteria that were used to consider whether a site was suitable for its proposed use at paragraphs 13 to 16.
- 1.4 Paragraphs 17 to 22 of Appendix 5 set out the SEA objectives, site assessment questions, and SEA scoring approach used to predict and make judgements on the significance of the environmental effects of developing each site. The outcome of the SEA Site Assessment process was used to inform options presented in the MIR and allocations in the Proposed Plan.
- 1.5 Sirius Sport & Leisure has reviewed the Council's SEA Site Assessment for south west Wallyford: (SEA Ref: PM/MH/HSG067 *South West Wallyford*). It is noted that this site is a much larger site than that promoted by Sirius Sport & Leisure. It includes land which is already allocated, consented and is now under construction.
- 1.6 This presents a confusing appraisal for the site now allocated in the Proposed Plan as PROP MH13: Howe Mire, Wallyford. Consequently, an appraisal has been carried out for the allocated site only. It has been updated as appropriate to take account of the proposal and mitigation measures where relevant.
- 1.7 The updated Site Assessment scoring is presented in the table below alongside the Council's scoring. Commentary in the table highlights areas of agreement between the Council's assessment and the review by Sirius Sport & Leisure. It also highlights areas of disagreement and explains the justification for the differences in scoring, taking account of the proposal.
- 1.8 The conclusion reached is the proposal scores more positively against the Council's assessment in the following SEA topics:
 - **Biodiversity, Flora and Fauna**
 - **Human Health**
 - **Water**
 - **Air**
 - **Climatic Factors**
 - **Cultural Heritage**
 - **Landscape**
- 1.9 The impacts of the proposal remain the same as the Council's assessment in the following SEA topics:
 - **Population**
 - **Soil**
 - **Material Assets**

Conclusion

- 1.10 Representations have been made to the Proposed Plan to support the allocation of this site. The environmental impact arising from this proposed allocation is not as great as highlighted in the Council's appraisal of the site as the proposal can introduce mitigation measures which can significantly reduce impacts or improve sustainability.

SEA Ref: PM/MH/HSG067	Site Name	Biodiversity, Flora and Fauna	Population	Human Health	Soil	Water	Air	Climatic Factors	Material Assets	Cultural Heritage	Landscape
Council assessment	South West Wallyford	o/?*	+	+/?	-	?	o/-	o/-	--	-/?	-/-/?
Sirius Sport & Leisure assessment	Gula Flats, Wallyford	+	+	+	-	o	+	+	--	+	o

It should be noted that the site assessment carried out by the Council is for a larger site and the actual proposal at Gula Flats is only part of the assessed area.

Biodiversity, Flora and Fauna

The Council confirms that the proposal ...is not within any areas designated for their international, national or local nature conservation interest but is within 1.2km of the Musselburgh lagoons wildlife site and within 1.5km of the Firth of Forth SPA/Ramsar site. The Council will consider impacts on the Forth SPA through the Habitats Regulations Appraisal process. It is also noted that there ... are no protected trees on or near the site. The proposal includes greenspace that extends along the centre of the site, leading to open space that includes SuDS measures at the western corner. Along with the introduction of gardens, all of this enables biodiversity enhancement to be provided in the proposal and the Council's score to be upgraded.

Population

The Council considers the site will have a positive impact through the provision of housing, including affordable housing. No reference is made that this is a mixed use development including economic uses and the promotion of jobs. The Council notes the site ...has reasonable access to facilities, services, and employment opportunities by active travel or public transport. Sirius Sport & Leisure agrees with this assessment.

Human Health

The Council notes that the site ...is not known to be contaminated. The site is well connected to the core path network. There are opportunities for active travel and recreation, through the accessibility of the core path network and the proposals open space provision. The Council's score can therefore be upgraded.

Soil

Most of, if not all of, the allocations in the Proposed Plan require the development of prime quality agricultural land. This factor is not determinant in the site selection process.

Water

The Council notes that SEPA flood mapping identifies some small areas of surface and river water flooding, mainly on the western edge of the site. This assessment refers to the larger site. There are no areas of river water flooding on the proposed site, but there are some potential areas of surface water flooding along the west of the site. An engineer designed solution incorporating SuDS measures will address surface water drainage issues. Addressing existing surface water drainage issues in the proposal enables the Council's score to be upgraded.

Air

The Council states that development ...on the site would not be affected by existing sources of air pollution. The site is in a location with good access to local facilities, active travel and public transport accessibility so the need to travel by car is minimised. Sirius Sport & Leisure agrees with this assessment. Although the Council further state that the ...development could exacerbate air quality problems in Musselburgh town centre by increasing vehicular traffic. An Air Quality Assessment will be carried out but it is anticipated that the proposal, because of the distribution of traffic onto the A1 directly, will not have an adverse impact on air quality, including Musselburgh town centre. The Council's score can be upgraded.

Climatic Factors

The Council's assessment highlights that the proposal is in a highly accessible location in regional terms and closer to major centres of employment than most other East Lothian settlements. The Council also highlights that the site is well positioned to access public transport, active travel routes, as well as local facilities and services. However, some increase in car travel will inevitably occur. Sirius Sport & Leisure agrees with this assessment. The Council considers the site does not lend itself to development that is resource efficient through siting (solar gain). Homes facing south east to south west can benefit from solar gain. The majority of homes proposed on the site are oriented to maximise the benefit of solar gain. The Council's score can therefore be upgraded.

Material Assets

The Council considers the site's development would not make efficient use of land and resources, being greenfield land of prime agricultural quality. Sirius Sport & Leisure does not dispute this assessment but notes that the same is true of the vast majority of all allocations in the LDP. This factor is not determinant in the site selection process.

Cultural Heritage

The Council state that the site ...is in the core area of the designated Pinkie battlefield and contributes strongly towards understanding of the battlefield landscape. Ongoing research of the battle manoeuvres confirms that this site was not part of the main fighting area of the battle. Accordingly, its development does not undermine the understanding of the battle or any associated relationships. A metal detecting survey was carried out on the proposed site and no evidence was found that linked the site to the main fighting area of the battle. Research in terms of Patten's description and ongoing metal detecting also highlights that the battle took place to the south of the A1. The proposal will not impact on the cultural and visual relationships of the battle. Accordingly, the Council's score can be upgraded.

Landscape

The Council states that the site has ...open long-distance views across it to Arthur's Seat and the Pentland hills. It is also visible in views from Crookston Road further west, looking east towards Fa'side Hill. These views would become more fragmented. The views from the west looking across to Wallyford need to take into account the large scale of development which is already allocated in the Local Plan. Approved development extends along the eastern side of Salter's Road up to the motorway junction. Further development on the western edge of this road will knit the urban form together creating a stronger entrance and gateway into Wallyford from the A1. There is no issue of coalescence.

From:
To: [Local Development Plan](#)
Subject: Objections to Proposed Local Development Plan -Saltcoats (NK7); Fenton Gait East (NK8) and Fenton Gait South (NK9)
Date: 04 November 2016 16:45:02

Dear Sirs,

My name is Alasdair Anderson,

I write to object in the strongest terms to the Proposed Local Development Plan (the "Plan"), to the extent that it relates to **Saltcoats (NK7); Fenton Gait East (NK8)** and **Fenton Gait South (NK9)** and to request their removal from the Plan as sites suitable for housing development. I refer also to the objections which I have previously lodged in connection with the specific applications for planning permission in respect of each of **Saltcoats** and **Fenton Gait East**.

The development of these greenfield sites would be most undesirable for reasons that must be obvious. East Lothian generally is renowned for its countryside and is attractive for leisure and other recreational purposes; in the case of Gullane there is also the draw of the seaside and the golf courses, all of which attract visitors who contribute to the economy. There is scope for Gullane to take its fair share of the housing requirement for East Lothian by the development of the brownfield site at the Fire School, to which I have heard few if any objections. I have no doubt that if the greenfield sites are zoned for development they will be developed before the Fire School site, because they will yield a greater profit for the developers; in that case the Fire School site would be left to decay and at least ten years may pass before it is developed, if at all. It is only recently that the eyesore that was once the Templar Lodge (or Queen's Hotel) has been removed from the landscape. That must not be allowed to happen again.

My other objections relate to the impact on local facilities, the school and medical practice, and to the poor transport links for commuters. These were explained in detail in my Saltcoats Field and Fentoun Gait East objections.

Your faithfully

Alasdair Anderson