

**To East Lothian Council  
Policy and Projects**

**Local Development Plan  
Main Issues Report**

**Consultation response by Dirleton Village Association**

The Dirleton Village Association (“the DVA”) submits the following comments for consideration as part of the consultation on the Main Issues Report and the Interim Environmental Report which accompanies it (together referred to below as “the Report”).

The DVA is a registered charity, whose objects are *inter alia* to encourage the preservation and where possible the improvement of the character, amenity and beauty of the village of Dirleton and its surroundings and to encourage high standards of architecture and planning in the area. We have considered the Report both in committee and at two well attended open meetings. Also, a number of our members attended the drop in session held at the North Berwick Community Centre on Thursday 4 December and one of us attended the separate workshop session held there that evening. We have the following answers to those of the questions posed in the Report which we consider most directly affect us.

**Question 3: Development Locations**

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

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

For the reasons stated in Table 5 of the Report (page 42) we favour the Council’s preferred option of compact growth, concentrated on the western part of the Strategic Development Area (“SDA”). We are concerned that significant development in the eastern section of the SDA would put an unacceptable strain on the infrastructure of the coastal plain, from West of Dunbar to east of Longniddry, and thus adversely affect the amenity of that area. See also our answers to question 16 below in relation to possible development in the Drem/Fenton Barns area.

#### Question 4: Town Centres

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

*If so should it:*

*a. serve only the new settlement; or*

*b. serve the new settlement and a wider area?*

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

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

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

We support the proposed new town at Blindwells, as being consistent with the strategy of concentrating development within the western part of the SDA. In particular we think it is clear that significant new housing provision at Blindwells would relieve the pressure to provide an unacceptable level of additional housing in the more rural parts of the local authority area, including the North Berwick coastal strip. We also think that it would render it unnecessary for the Council to promote the large-scale development at Fenton Barns which is postulated in the Report, which for reasons indicated below we think would be disastrous for the amenity of the coastal strip.

We are however concerned that if development takes places in Longniddry, to the south of the railway line, this could lead to the coalescence of Blindwells and Longniddry. The Council would need to ensure that adequate infrastructure was in place to support such coalescence.

We are also concerned that, if significant development takes place at Blindwells and south of Longniddry, as well as in the Wallyford area, this would put considerable strain on the road network, including in particular access to the A1 at the Musselburgh, Tranent and Macmerry interchanges, and further west at the Old Craighall interchange, and that these would all require significant upgrading.

The town centre which most directly affects us is North Berwick. This is where our secondary school is located and where most of our residents' day to day shopping needs are met, there now being no shopping facilities in Dirleton since the village shop closed in 2014. In addition to providing these facilities to the surrounding communities, the economy of North Berwick relies on tourism, including golf tourism, and its facilities attract significant numbers of visitors. The parking capacity of the town is severely limited and traffic circulation in and around the town is problematic. These difficulties require to be resolved, even without the expansion in the population which is envisaged in the Report. Other services, such as medical provision, are also known to be under strain.

### **Question 5: Planning for Employment**

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

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

There is little scope for increasing the amount of employment in Dirleton and most residents who are of working age and in employment travel outwith the immediate area of the village to work. We do not see this situation changing within the timeframe of the Local Development Plan covered by the Report. It seems to us that this situation is accepted by the Council, in that there is no provision in the Report for additional employment land in the village. We comment elsewhere in this response to the position in Fenton Barns, where it has been suggested that such a provision might be made.

### **Question 6: Planning for Housing**

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

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

In the light of government policy it seems inevitable that the Council should follow the preferred approach and consider making provision for housing need and demand beyond 2024. As the main driver for this need seems to be the economic expansion of the Edinburgh city area, we are strongly of the view, however, that this provision should fall primarily within the Strategic Development Area and in particular within the western part of it, being that closest to Edinburgh. Thus residential development should occur nearest to where there are employment opportunities and the need for lengthy commuting to work should be minimised.

There was particular concern at Dirleton village meetings that, as indicated in our answer to question 4 above, all the new housing development proposed, in particular that at Wallyford, Blindwells and south of Longniddry, will put considerable strain on the road network leading onto the A1 and into Edinburgh. This will particularly affect the Musselburgh, Tranent and Macmerry interchanges, as well as the Old Craighall interchange further west, all of which we think would require significant upgrading. It also seems likely to have the effect of pushing traffic on to unsuitable minor roads in areas adjacent to and joining the A1.

**Question 7: Green Belt**

**Question 8: Countryside Around Towns**

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

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

We answer these two questions together. We do not comment on the Council's policy towards the Green Belt as this is fairly distant from our area. We are however strongly in favour of the Council developing the use of Countryside Around Towns designations and it follows that we favour the Council's preferred approach. We see the conservation of the rural setting of Dirleton as essential to its character and consider that such a designation would add greater protection to the retention of that character. We note with approval that the area around Dirleton which is indicated as suitable for inclusion in such a designation would follow roughly the boundaries of the present Conservation Area. We are also concerned that there should continue to be a clear separation between Dirleton, North Berwick to the east and Archerfield to the north and we feel that the preferred approach would strengthen that objective. Similar considerations would apply to the other rural communities which you mention with reference to these designations.

**Question 9: Central Scotland Green Network**

*In terms of approach to the Central Scotland Green Network in East Lothian, do you support the preferred approach, the reasonable alternative, or neither?*

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

As in our answer to question 8, we favour the preferred approach. The concept of the Green Network is perhaps not so clearly understood as that of the Countryside Around Towns designation and we think that the supplementary guidance to which you refer would encourage a greater understanding of it. We also think that implementation of this strategy would strengthen the case for retaining the separation of Dirleton from neighbouring communities, as referred to in our answer to question 8. Similar considerations would apply to the other rural communities which you mention with reference to this strategy.

### **Question 10: Development in the Countryside and on the Coast**

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

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

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

*Please explain your answer.*

We favour rigorous restrictions against development in unspoilt coastal areas, such as the whole coastal strip from east of North Berwick to Aberlady. We note however that such restrictions seem to apply to both the preferred and reasonable alternative options to which you refer.

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

Not answered, but see comments about Longniddry in answer to question 4, above.

### **Question 16: North Berwick Cluster**

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

We note that the preferred strategy supports the retention of existing operational employment areas as well as the employment allocations of the current local plan and that in addition it is proposed that land extending to about nine hectares at Tantallon Road on the eastern edge of North Berwick could be promoted for a mixed use development of housing and business land. We have no objection to this approach.

*Do you think that all of the preferred housing sites can be delivered in the anticipated timeframe?*

*Please explain why.*

We do not have the knowledge to answer this question.

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

*Where might any new education facilities be located if required?*

We understand that the maximum capacity of Dirleton primary school is 100, that the current school role is 82, and that there is no scope for expanding the school facilities further on the present site. We are also aware that the school capacity is based on there being four composite classes of 25 pupils each but we understand that the government has an objective of reducing composite classes to 18 pupils. If this were implemented, and taking into account planning permissions already granted but not yet implemented within the Dirleton school catchment area, such as at King's Cairn, Archerfield, it seems to us that there is limited scope for increasing primary education capacity in Dirleton and we note that this is consistent with what is stated at paragraph 6.91 of the Report.

As regards secondary school provision, we note from paragraph 6.90 of the Report that there is some scope for expansion of North Berwick High School but that the constraints mentioned in the Report as to land available for expansion may limit the extent to which housing provision can reasonably be expanded within the cluster.

We are not in a position to comment on primary school provision in other parts of the North Berwick cluster.

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

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

We comment below on housing sites in Dirleton and at Ferrygate in North Berwick and on suggestions made in the Report relating to the Drem/Fenton Barns area of search. We do not comment otherwise on housing sites in the cluster.

### **Housing sites in Dirleton – general comments**

As regards the sites designated in the report as the preferred and the reasonable alternative sites in Dirleton, on which we comment individually below, we would emphasise that there are divergent views within the village as to which of these two sites should be preferred, with no clear consensus of opinion. We therefore reflect below the comments that have been made on these two sites individually. But we would also point out that there is a consensus of concern within the village that any development should be sympathetic to its conservation status and that the layout and architectural style of any new development should reflect, and be compatible with, that status. We would hope that developers would consult with us on these matters at an early stage of the preparation of their plans. We also consider it important that the limitations of the primary school capacity and of other facilities in the village (or lack of them) should be taken into account and that issues of increased traffic should be carefully considered.

### **Land to south of Castlemains Place, Dirleton**

This is identified in the Report as a preferred site for housing development. Given the restricted scope for development in the village arising from the limits on school capacity identified in the Report, we feel that some development on either this site or the site to the north of Foreshot Terrace would be reasonable and we therefore accept the Council's assessment of them as being a preferred site and a reasonable alternative site respectively.

While there are some concerns about the suitability of this site for development, the following points have been noted:-

- It is relatively close to the A198 main road on its southern boundary. While this might result in noise disturbance within houses built on the site, the main road would provide a buffer against encroachment southwards.
- The site is adjacent to, and its development would be compatible with, existing affordable housing on its northern boundary.
- Views of Dirleton Castle on the approach to the village from the east might be adversely affected by development but this could be minimised by restrictions on buildings to 1 or 1½ storey height, which would be compatible with the existing housing to the north.

### **Field north of Foreshot Terrace, Dirleton**

This is identified in the Report as a reasonable alternative site for housing development. As mentioned above there are differing views in the village about the relative merits of this site over the Castlemains Place site.

The Association has submitted previously comments to the Council in respect of applications to develop this site (also called the Ware Road site). We are concerned that if the site is developed there may be future pressure for allowing its encroachment northwards into undeveloped farmland which would be likely to be protected if the Countryside Around Towns designation is introduced. In addition vehicular access to the site would increase pressure on the busy junction to Yellowcraig and young children would have to cross the busy main road through the village on their way to school.

There is evidence that this site and the remainder of the field of which it forms part is used as a feeding ground for overwintering pink footed geese. This is not mentioned in the Council's site assessment.

### **Land off Castle Park, Dirleton**

This is not identified in the Report as a preferred or reasonable alternative site for housing development. It is adjacent to Dirleton Castle and we note that Historic Scotland have strong objections to its development on cultural heritage grounds. Despite this, views have

been expressed within the village community that it might be suitable as a site for a small number of affordable housing units.

#### **Land to the East of Ware Road, Dirleton**

This is not identified in the Report as a preferred or reasonable alternative site for housing development. It comprises prime agricultural land and lies within the Dirleton Conservation Area but outwith the present built area of the village. Housing on the site would extend the built area of the village eastwards into the open countryside between Dirleton and North Berwick and would be highly visible when approaching the village from the east. We would not support its development.

#### **Land to the south of Gylers Road, Dirleton**

This is not identified in the Report as a preferred or reasonable alternative site for housing development. It is stated in the site assessment to be suitable for a development of up to 50 housing units, which we consider to be too large for the village and which would create problems relating to school capacity, as referred to in the Report. We also feel that a development of this size would conflict with the conservation area objectives. Any development would also be highly visible in views from the A198 main road and from the south and south east. We would not support its development.

#### **Land at Speedwell Gardens, Dirleton**

This is not identified in the Report as a preferred or reasonable alternative site for housing development. It is stated in the site assessment to be suitable for a development of two housing units, although the site is the subject of a current application for planning permission for a single house, on which the DVA has submitted comments to the Council. There are mixed views within the village community about the suitability of the proposed development and we do not comment either for or against it in the context of the Report.

#### **Vacant ground adjacent to Rathowan, Main Road, Dirleton**

This small site, extending to 0.0425 hectares, has been submitted for consideration with a view to its being merged into the garden of the adjoining property. It is bounded on the north east and the south east by established woodland. The Association understands that there are no views against this proposal within the village community and does not itself express such a view.



## **Dirleton Glebe**

This site is not identified in the Report as a preferred or reasonable alternative site for housing development. It extends to 3.6 hectares on the north side of the village and comprises prime agricultural land beyond the existing settlement boundary and within the conservation area. The submission suggests that 10 to 12 housing units could be accommodated on part of the site, extending to 0.9 hectares. There is an apprehension that if the site were developed, the lack of a robust and defensible northern boundary would create pressure for allowing its encroachment northwards. This would conflict with the Countryside Around Towns designation which is proposed in the Report and which we support and with the conservation area objectives. We have not been advised of any support for development of this land within the village community and we are opposed to it.

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

Yes.

## **Ferrygate, North Berwick**

We note from the Report that the site at Ferrygate is identified as a reasonable alternative site for housing in North Berwick, with an indicative capacity of up to 200 housing units. We submitted objections to the two applications for planning permission in principle for the development of this site, the first of which, with an indicative layout of about 100 housing units, was refused and is now the subject of a petition for judicial review in the Court of Session, and the second of which, with an indicative layout of 140 housing units, was recently refused. We remain concerned about the development of this site for housing, for the reasons stated in the recently issued refusal notice, in the letter of objection which we submitted and in the representations which were made jointly by us and the community council to the planning committee.

## **Potential Drem/Fenton Barns Expansion Area of Search**

We are concerned at the suggestions made in the Report about significant development in the Drem/Fenton Barns area, which lies close to Dirleton. We opposed the application for planning permission in principle for employment land, drainage works and enabling residential development which was refused by the Council in October 2013. We note from the Report that the same site, which extends in total to 14 hectares, has been submitted as suitable for a similar development. It appears from paragraphs 6.88 and 6.89 of the Report that the Council does not consider the site to be either a preferred site or a reasonable alternative site for development but it is not clear to us how this may be affected by the longer term suggestions for the Fenton Barns area. We remain opposed to development along the lines of the one which was refused planning permission in 2013 for the reasons stated in the refusal notice, in the letter of objection which we submitted and in the representations which were made jointly by us and the community council to the planning committee.

We are also concerned about the wider suggestions made in the Report for long term and larger scale development in the Drem/Fenton Barns area, which we consider to be inappropriate for the following reasons:-

- While part of the relevant “area of search” appears to be included within the SDA, it seems to us that it is only included because Drem happens to be on the main east coast railway line. Only a limited number of trains, however, use Drem station, where facilities for handling the rail and road traffic likely to be generated by the envisaged scale of development would need to be significantly upgraded, even if timetabling constraints on this busy main line route could accommodate them.
- The road system is inadequate and links between the area and the A1 trunk road would need substantial upgrading, both southwards for traffic to and from Haddington and the south and westwards for traffic to and from Longniddry, the western part of the SDA, which is earmarked as the main focus for development, and Edinburgh.
- Development on the scale which is envisaged would cause serious congestion on the A198 coast road and in the villages of Gullane and Aberlady through which it runs.
- Such development is projected as creating a new town of up to 6000 homes - significantly larger than North Berwick and likely to comprise one of the largest communities within the local authority area. This would unbalance the social equilibrium of the whole of the North Berwick cluster and the coastal area and would undermine the viability of tourism and agriculture, which are the main economic drivers in the area.

It is for these reasons that we are strongly opposed to the sort of development in the Drem/Fenton Barns area which is postulated in the Report and have suggested in our answer to question 3 above that the main focus of development should be in the western part of the SDA.

#### **Question 17: Blindwells New Settlement**

We have commented on this, to the extent that we feel it is appropriate for us to do so, in our answer to question 4 above.

#### **Question 18: Housing Land Requirements and Housing Land Supply**

*Does Table 26 set out the proper way of calculating how the SDP housing requirement is to be met?*

We do not feel qualified to comment on the technicalities of this table or the statistics contained in it.

#### **Question 19: Developer Contributions**

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

We do not feel qualified to answer this question

**Question 20: Affordable Housing Quota**

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

We note that the preferred approach is to continue the existing requirement that there should be a 25% affordable housing quota and that the reasonable alternative approach is that there should be a 30% quota. We accept that there needs to be a quota but we do not think that the difference between the two suggested percentages would be significant in the context of possible development in Dirleton.

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