

SESplan SDP2

Response to MIR consultation on behalf of Gullane Area Community Council

Question 1

The vision

We note that the preferred option for the vision for the SESplan area is that it aims to build on the strengths of Edinburgh and South East Scotland, address its challenges and set a clear direction for its future growth. We support this as a very broad aim, but subject to the following comments, which refer to statements made in Figure 1.2 of the MIR:-

1. “New development is integrated with existing communities and in accessible locations on transport corridors” - In the past, significant new housing development has been permitted in locations which are not easily accessible to adequate transport corridors - for instance in the North Berwick area. While that area has the benefit of train connections to Edinburgh, as indicated below most journeys are understood to be undertaken by car and the existing road network does not support the level of development which is being undertaken now and possibly in the future. We are not confident that sufficient improvements will be undertaken in the future to overcome this problem.
2. “Walking, cycling and public transport account for an increasing proportion of all journeys” - While walking, cycling and public transport may account for an increasing proportion of all journeys, we think it is likely that for convenience, particularly in rural areas such as ours, the majority of journeys, including journeys to and from work, will continue to be undertaken by private car. It is unrealistic to expect most people to walk or cycle anything other than fairly short distances to and from work.
3. “Green networks are delivered in Strategic Development Areas” - Green networks should be established and preserved for rural communities and not only for those in strategic development areas (SDAs). This is consistent with the proposals in the East Lothian LDP MIR relating to the Countryside Around Towns policy as protecting smaller rural communities as well as the policy relating to Green Area Networks.

Question 2

A strategy for Edinburgh and South East Scotland

We support Option 3 as the preferred option for growth, focused on Edinburgh, with additional growth close to the city and along corridors with good public transport access. This is likely to reduce lengthy commuting and the adverse impact that will have on the environment.

We think, however, that such corridors need to be more clearly defined than they are in Figure 2.4. If the East Lothian corridor is to be developed to the extent indicated, significant upgrading of the transport infrastructure will be required, not only within the local authority area but further afield, for instance on the Edinburgh city bypass. We believe that in practice growth within the East Lothian corridor should be concentrated at its western end, as was

indicated by your officials at the consultation with community councils held in Haddington on 4 August.

In Paragraph 2.2 of the Report you refer to the target of a 60 minute public transport travel time from Edinburgh and we understand this to indicate the maximum time which it is reasonable to expect people to undertake on a “home to desk” commute. We think this target would be unachievable for most people throughout our area commuting to employment locations in and around Edinburgh and that nothing you propose in the Report would be likely to change that materially.

Question 3

The principles for development

While we support the principles for development as articulated in Paragraph 2.4 on a general footing, we think that a number of them are inappropriate or irrelevant in our community council area. In particular:-

- there is limited scope for increasing employment in the area and this is likely to significantly reduce the logic of locating new development in it;
- there are no town centres as such in our area and little scope for further town centre development in North Berwick, though such development, or regeneration of the existing town centre, may be more appropriate in Haddington in the light of the further housing development taking place and planned there and its positioning within the East Lothian SDA – this is mentioned in our answer to Question 15, below;
- except for the former Fire Service training college site in Gullane, which we have acknowledged as being in principle suitable for housing development, possibly with a small business/workshop element, there is a very limited supply of brownfield land in our area;
- there is likely to be limited scope for improving transport networks in the area; this is a complex issue, on which we comment more fully in our answer to Question 17 below;
- some local infrastructure in the area is under considerable pressure – for instance health service provision in North Berwick, which is not keeping pace with the increasing housing provision there.

Question 4

The principles for development (continued)

The “Principles” to be promoted in Paragraph 2.5, on which this question is predicated, relate to development within SDAs. With the exception of Drem, our community council area is not within an SDA, so the question hardly affects us directly. We think it is dangerous, however, for some higher authority, presumably SESplan or the Scottish government, to “direct” delivery of what you refer to as “high quality places” through the Local Development Plan (LDP) without taking into account the views of local communities. So far as Drem is concerned, in our response to the East Lothian LDP MIR we articulated reasons why we did not consider that area to be suitable for development.

Question 5

Locations of significant business clusters

We support option 1, the preferred option, identifying business clusters reflecting the differing nature of the economies of the city, towns and rural areas of the region. However, we note from Figure 3.1 that, so far as East Lothian is concerned, significant business clusters appear to include Musselburgh and the whole coastline eastwards from there to Torness, east of Dunbar. The logic of including that part of the East Lothian coast between Longniddry and Dunbar is not explained. It seems to conflict with the text of Paragraph 3.1, which states that tourism is supported in all areas; with Paragraph 3.5, which states that farming is integral to the rural economy, and with Paragraph 3.6, which states that the attractions of the area include golf and coastal activities in East Lothian. Also, we note that although the expression "Tourism Recreation Development" is shown in the key to the map, the only location identified for this appears to be South Queensferry. This is not explained in the text. The main economic drivers in our area are agriculture and tourism and we suggest that what is shown in Figure 3.1 is incompatible with these considerations.

Question 6

The Visitor Economy

We support the preferred option of locations for nationally and regionally important tourism and recreational developments being safeguarded through the LDP. However in stating the preferred option you refer to these and "emerging opportunities" as being shown in Figure 3.1. As stated in our answer to Question 5, we do not think they are shown there, with only one exception.

We are also concerned at the emphasis you place on "development" and "opportunities" in respect of tourism and recreation. East Lothian already has a highly developed golf industry and significant numbers of people visit the area, whether to stay or on day visits from other areas, to enjoy the undeveloped nature of the coast and countryside. It should be a priority to preserve these.

Question 7

Wind energy

We support the comments relating to wind energy so far as affecting our area.

We strongly agree that many of the sites most suitable and least harmful to the environment and landscape have already been developed and we consider that there is little, if any, scope for further such development in our area. We support the planning guidance on lowland wind turbines published by East Lothian Council and the continuation of such restrictions as postulated in the LDP MIR.

Question 8
Resource extraction

We support the preferred option of continuing the present approach of Scottish Planning Policy and the LDP relating to the extraction of aggregate, minerals and surface coal. We understand from the Minerals technical note accompanying the MIR that it is unlikely that such extraction will be relevant to our area.

Question 9
Waste

We support the suggestion made in the MIR that the present policy relating to waste should be continued with little change.

Question 10
Housing land across the SESplan area

Based on the information contained in Paragraph 4.1 of the report, it seems that Option 1 (envisaging steady economic growth in the region) as opposed to Option 2 (increasing economic activity) or Option 3 (strong economic growth) is the logical preference. We are, however, concerned at the reference to “lower immigration to the SESplan area” being envisaged under Option 1 than under Options 2 and 3, in the light of the current general likelihood of increased immigration, and we wonder if, in view of this, the stated preference of Option 1 should be revisited. We also wonder if all three of the growth predictions set out in paragraph 4.3 of the report (steady economic growth, increasing economic activity and strong economic growth) may perhaps be over-optimistic in the light of national and global economic trends and developments since the report was published.

Question 11
Housing land in Edinburgh

We support the preferred option that the city of Edinburgh should itself meet a significant proportion of its own housing need and demand. We think it is unrealistic to expect it to meet the whole of such need and demand, in view of the high level of integration which exists between it and the communities immediately surrounding it.

On the understanding that the large majority of employment opportunities in the region exist, and area likely to be created in the future, within Edinburgh and those communities, we think it is important that the need for people to travel any significant distance between home and work is minimised. However much public transport is improved, for many people, and particularly for those living in rural areas, car travel to and from work will remain the preferred option. The problems arising from this, including congestion and pressure on the environment, will be greatly reduced if such travel is minimised. As indicated in our answer to Question 1, while encouraging people to use alternative means of transport to and from work, such as walking, cycling, may be appealing in theory, for most people it is likely to be a viable option only for relatively short journeys.

In our area the present planning regime has encouraged permission to be given (typically by the government on appeal from an adverse decision by the local authority) for the construction of a disproportionate number of large family houses. Because of the lack of employment opportunities in the immediate area, a high proportion of these houses are occupied by people who work outwith the area, typically in Edinburgh, thus increasing the problems created by increased commuting referred to above.

Question 12
A generous housing supply

We support Option 1. We think it right that LDPs should have the flexibility to set a generosity allowance which reflects local needs, even if this is above the 10% allowance referred to in Paragraph 4.3 (Issue H). In the light of our comments on the economy in our answer to question 10, however, an indicative generosity allowance of 10% may itself be too high.

Question 13
Affordable housing

It seems reasonable to direct LDPs to require that at least 25% of housing units within what you describe as a “market site” should be affordable housing. From the figures you quote in Paragraph 4.4, however, and those shown in Table 4.4, it appears that in the case of most local authority areas, including East Lothian, this percentage may be unrealistically low.

Question 14
Setting housing targets and requirements

It seems obvious that in deriving the housing supply target and housing requirements across the SESplan are as a whole, SDP2 should consider the factors you mention – economic, environmental and infrastructure opportunities and constraints. We think it is natural that, as with any major city, the influence of the city of Edinburgh in terms of house sales extends well beyond its administrative boundaries. However we think that the local circumstances in each of the sub-housing markets to which you refer need to be taken into account. It seems to us that in East Lothian the volume of market sales resulting from planning consents often won on appeal following refusal by the local authority, bears no direct relationship to local housing needs. As a result housing provision is taken up by purchasers who commute longer distances to work, typically into Edinburgh, thus defeating the objective of encouraging short journeys to work. In the light of these factors, the area of direct influence of the city of Edinburgh needs to be clearly defined.

On a broader basis, we are concerned at the length of the lead time involved in developing a Local Development Plan that is aligned with a new Strategic Development Plan. We see no reason why emerging strategies at the Local and Regional level, as set out in the ELC LDP MIR and in your SESplan vision, should not inform decision making on appeals against local planning application refusals, rather than by reference to SDP1, which is beginning to lose its relevance as the strategic needs of the region evolve.

Question 15
Town centres

We note that the only town centres which you identify are Edinburgh as a strategic centre and Livingston, Dunfermline, Kirkcaldy and Glenrothes as regional centres. In the light of the level of development which you indicate you will encourage within the East Lothian SDA, following the A1 corridor, we suggest that there may be a case for identifying such a centre within that SDA, possibly in Haddington.

Question 16
Strategic green networks

As the strategic green networks to which you refer in Paragraphs 4.17 to 4.22 and as shown in figure 4.2 relate to areas mostly well away from our area, we do not comment on the options you put forward. With reference however to your suggested priority area 11b (Forth coast - Musselburgh to Port Seton and inland to Blindwells and Tranent) we feel it is important to avoid the coalescence of communities in the Port Seton – Blindwells - Longniddry area and we commented on this in our response to the East Lothian LDP MIR.

We note that your comments on green networks relate mainly to the more heavily developed areas of the SESplan region. In the East Lothian LDP MIR it was indicated that the Countryside Around Towns and Green Area Network policies could be applied to protect the character and individual identity of smaller communities such as those within our community council area. We strongly supported this approach in our response to the East Lothian LDP MIR and we hope that you will not overlook it in considering green network priority areas within the regional context.

Question 17
Transport policy direction

This question is critically important in a rural area such as ours which is not well connected to SDAs and significant employment opportunities and we have commented on this more fully in our answer to Question 2 above. Thus we strongly support your Option 1, to better direct development to accessible locations. While we also support your objective of promoting travel by walking, cycling and public transport over private car journeys, we are sceptical about your ability to achieve that objective in respect of rural areas such as ours. As indicated above in our answers to Questions 2 and 13, we think it is unrealistic to expect many people to walk or cycle to work except where their journeys are relatively short. The infrastructure of roads and paths in our area is inadequate to make such modes of travel attractive or safe options.

On the face of it our area is reasonably well connected to Edinburgh because of the North Berwick railway line. Except for the small community of Drem, our villages are however all several miles distant from the stations; bus transport between the villages and the stations is infrequent and unreliable and does not necessarily co-ordinate with train times and car parking at some of the stations, for instance Drem and Longniddry, is inadequate. Because of these shortcomings, for most people there is no realistic alternative to most travel being

undertaken by private car. Attempts to bring pressure to bear on the train and bus operators, including the new Scotrail franchise holder, have proved unsuccessful.

We do not see these problems being resolved unless the government and/or the local authorities take a positive lead in procuring the improvement of the infrastructure.

Question 18

Regional walking and cycling network

The aspiration of a walking/cycling route between Gullane and Drem, indicated as such in Figure 5.2 of the report, would be valuable in providing a safe link to Drem station. Such a route should also be provided between Dirleton and Drem. The other routes shown in that Figure 5.2 as being within our area, which include a key section of the John Muir Way, are all already established and are recreational in nature. They are all generally satisfactory and we do not comment further on issues raised in respect of this question.

Question 19

Prioritising strategic transport infrastructure

We do not think that any of the strategic transport infrastructure interventions referred to in Paragraph 5.11 will benefit our community council area. We think that the only interventions listed in Table 5.1 which benefit our area will be improvements to the East Lothian railway line (if by that you mean the North Berwick line) and improvements to the A720 Edinburgh city bypass. The re-opening of the East Linton railway station might have a marginally beneficial effect on car parking at Drem and Longniddry stations, identified in our answer to Question 17. If local trains running between Edinburgh and Dunbar were to stop at Longniddry and Drem, subject to appropriate timetabling this could result in a half hourly service between these stations and Edinburgh, which would be of significant benefit to the area. Improvements to the Edinburgh city bypass, particularly to the Old Craighall junction and the Sheriffhall roundabout, and easing of congestion further west on the bypass, would have significant benefits for transport links to and from East Lothian. We feel that at present the inadequacies of this primary transport route are a major disincentive to development in East Lothian.

Question 20

Infrastructure delivery

We do not feel qualified to comment on the options for infrastructure delivery set out in Issue M of the report.

Question 21

Funding transport infrastructure – developer obligations

We do not feel qualified to comment on the technicalities you set out as the preferred option in respect of developer obligations. It does however seem to us that there is at present an over-dependence on such contributions. We suggest that if the government and the local and regional authorities are genuinely seeking to promote the sort of

improvements which are indicated in the report, then it is incumbent on them to meet more of the costs of these improvements from the public purse.

Question 22 – Assessing the five year effective land supply

Question 23 – Climate change adaptation

Question 24 – Development planning and community planning

Question 25 – Strategic environmental assessment

We do not feel qualified to comment on these questions.

Question 26

Other issues

Digital connectivity

Although you refer to digital connectivity in Paragraphs 5.14 to 5.16 of the report, you neither offer any options nor pose any questions about it, and we do not think you place sufficient emphasis on it. We consider the availability of fast internet and data connection to be of critical importance in supporting communities such as ours. Through such facilities home working and the establishment of small rural businesses will be encouraged and economic disadvantage and isolation, and the need to travel, will be reduced.

As you correctly say in Paragraph 5.15 of the report, some areas of East Lothian (and these include some within our community council area, which are not otherwise particularly isolated) are disadvantaged in this way and we think it should be the responsibility of SESplan to facilitate a solution to this problem. The same disadvantage applies to mobile telephone services, where there are parts of the area, which in the same way are not particularly isolated, which receive inadequate mobile signals or no mobile signals at all.

Gullane Area Community Council

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Note – The foregoing response was lodged with SESplan on 29 September, prior to the submission deadline. Errors in the text of the answers to questions 3, 4, and 5 were later identified and corrected in liaison with SESplan. These corrections are reflected in the above version of the response.