

PROPOSED LOCAL PLAN - BASIS FOR A MUSSELBURGH CONSERVATION SOCIETY OBJECTION

The proposed East Lothian Local Development Plan has just been published for consultation. It sets out how the provisions of the Strategic Development Plan (SDP) will be delivered locally. The SDP Plan, which covers the whole of southeast Scotland, requires 10,050 dwellings in East Lothian up to 2024. The council has allocated land for 13,583, including current commitments, but some of this will be delivered after 2024 and it includes an overprovision (or generosity allowance) to cover slippage in the event of delays in delivery. The figure actually anticipated to be delivered across East Lothian by 2024 is 12,329 which represents an over provision of 23%.

The allocations (i.e. the 13,583) are as follows:

Musselburgh	5304	across a range of specified sites (over 50% increase in population)	
Preston Seton Gosford	659		
Tranent	1520		
Blindwells	1600		
Total for west (the council's preferred 'compact growth' area)	9083		
Haddington	1682		
Dunbar	1502		
N Berwick	1316		
Total for east	4500		

The Society maintains that the strategy for compact growth in the west closest to Edinburgh to deliver these numbers is flawed, notably because of its impact on Musselburgh. In summary the reasons are:

- Stresses on infrastructure and services
- Concentration will not deliver various government or council's aims and objectives
- Unacceptable mass of development when coupled with adjacent proposals in Edinburgh and Midlothian
- Road network constrained in Musselburgh and consequent impact on the High Street
- Local accessibility overplayed - can't get on trains, buses slow and do not link with employment areas (proximity to Edinburgh does not equal accessibility)
- Musselburgh has a special character and a distinctive identity which needs to be protected.

We want to get the numbers for Musselburgh down. We propose to lodge an objection to the Local Plan suggesting they be reduced by 1000. This is based upon not replacing what was lost by omitting the Goshen site and is in effect damage limitation. We would like to suggest more and call for greater dispersal across the county but any new proposals elsewhere will be vigorously challenged and require testing thus delaying the Local Plan process and leading to more speculative and inappropriate schemes by developers (e.g. around Inveresk) because there is no effective Local Plan. We believe that 1000 can be accommodated without proposing anything seriously challengeable. (See below)

Revised proposals for Musselburgh would be dictated by the vision (settlement strategy) that we have put together based upon the protection of Green Belt and which will also form part of our representation on the Plan. Specific changes to the Plan to be proposed in our objection are:
Omit Howe Mire (170) - battlefield impact and no defensive Green Belt boundary thus threatening the fields between Wallyford and Musselburgh. Also channels traffic through Inveresk. Replace small employment allowance here at Craighall.
Omit Whitecraig North (200) - over expansion of Whitecraig, no defensible Green Belt boundary and channels traffic through Inveresk.

Reduce Craighall by 430, i.e. down to 1,070 thus reducing the amount of development south of the A1, remote from the town and close to Shawfair. The Main Issues Report (MIR) figure for this area was 700 with potential for more. A greater employment allocation could replace the loss; this is an excellent employment location.

Reduce Dolphingstone South by 200 - possibly achieved by reducing amount of high density housing inappropriate for this area. MIR figure here was 400 as a safeguard. Local Plan figure is 600 as a firm proposal.

We could propose a greater reduction at Dolphingstone South but the numbers are apparently needed to create a critical mass for the new secondary school and in any case the land has already been despoiled in preparation for development. An alternative would be to propose no reduction here and lose 630 at Craighall reducing the figure there to 870 (closer to the original 700) but there are traffic advantages in concentrating development in the south west and numbers are apparently needed to enable employment development.

As regards how we replace the 1000 we propose the following or some other numerical combination between the three headings:

300 – a greater allowance for windfalls, i.e. unpredicted development, including developments in the countryside and so-called enabling development (development considered acceptable in order to fund something of particular benefit), plus the bringing back into use of long term vacant units, notably above shops in town centres.

250 - increase the allocations proposed in villages with a school and regular bus service. 250 represents an average of 25 in ten locations through higher density with more socially rented housing possible.

450 - reduce the generosity allowance by a few percentage points. This would mean sites for 450 fewer homes would be need to be found.

We will be suggesting that the idea of school provision at Craighall being shared with Midlothian is resurrected because it would take pressure off the Grammar School, and we will suggest that Craighall village be taken out of the Whitecraig Primary School catchment since access is impossible except by car or school bus. We wonder how the loss of 1000 would impact on secondary provision but it seems the council is now wedded to the idea of a second school at Wallyford.

Across the whole plan area we are concerned about the generosity factor. Even with the reduction we propose it would still be at 18 or 19%. These are sites allocated to make up numbers and are not necessarily the best sites but many are easy to develop and will be attractive to developers. Subject to further reading of the Plan we are minded to call for a phasing policy which releases certain identified secondary sites only if the key strategic sites are not delivering. Delivery would be monitored on an annual basis.

BARRY TURNER on behalf of Musselburgh Conservation Society
September 2016

Development site locations:

Howe Mire - Land immediately to the south west of the skeletal greyhound track grandstand.

Whitecraig North - land immediately to the northwest of the car dealers in Whitecraig and behind the Mercat.

Craighall - Large area of land on both sides of the A1 surrounding Queen Margaret University south of the railway line.

Shawfair - Large development area in Midlothian immediately west of the East Lothian boundary.

Dolphingstone South - An eastwards extension of the Wallyford development area.