***February 7th 2015: As approved by The Trustees***

*Dear Sir/Madam,*

***RESPONSE TO THE EAST LOTHIAN LOCAL DEVELOPMENT PLAN MIR***

*The East Lothian Development Plan Main Issues Report and Interim Environmental Report contain several proposals that the Battle of Prestonpans (1745) Heritage Trust, a locally based charity, finds unacceptable.  The Trust is therefore responding hereby to the MIR IER in direct relation to these specific elements, rather than attempting to address the matter through the broad questions posed within the Consultation Hub.*

***1 SITE PM/PP/HSG030:*** *This site, proposed for housing development, comprises land surrounding Bankton House and the fields to the west of Johnnie Cope's Road.   Bankton played a significant part in the Battle of Prestonpans.  It is located to the immediate south of the battlefield and was also the home of Col. James Gardiner, who fell on the field and who is commemorated in the monument that lies within the site on the north side.  Both the house and monument are now Listed.  The development of this site for housing would be completely inappropriate and hugely damaging to the setting of the Listed Buildings, including the designed landscape within which they are located. Johnnie Cope's Road itself is also of most considerable significance in interpretation of the battle since it was Sr John Cope's escape route via Birslie Brae.*

***2 SITE PM/PP/BUS005:*** *This site, proposed for business use, comprises the eastern portion of site PM/PP/HSG030.  While it is smaller than the site above the impact of its development would be similar and, for that reason, the Trust does not consider that the site is suitable for the proposed use.*

***3 SITE PM/PP/OTH001****:  This site, proposed for mixed use development (employment), corresponds broadly with the boundaries of the land held by Scottish Power around and including Cockenzie Power Station.  It excludes a section of the foreshore but includes some sections of land in separate ownership, mostly on its western side.*

*The Trust is deeply concerned that this site is being considered for development.  The southern half of the site, including the existing but redundant power station coal plant, forms a substantial portion of the main site of the Battle of Prestonpans.  It includes the site of the thorn tree, under which Col. Gardiner was mortally wounded, the land on which the Government army camp was established, the site of the Government lines immediately prior to the initial engagement, the land over which the battle was fought following the Jacobite charge from the east and the likely site of the grave pits, dug on the day of the battle.  Crossing the land and running north-south is a core path, following the track bed of Scotland's first recorded waggonway.  This originally ran from Tranent to Cockenzie Harbour and is recorded in many of the contemporary illustrations of the battle.  Also within the site boundary is a Scheduled Ancient Monument, the Seton West Mains Enclosures.  Although the Scheduled site was significantly reduced in size in 2013 it still comprises a substantial portion of the site.*

*A modern (1960s) railway spur crosses the land and formerly served the power station coal plant but the land to either side of the line and potentially within the coal plant itself has not been built on or otherwise developed.*

*The site is within the Prestonpans Battlefield as included in the Inventory of Historic Battlefields in Scotland and is unquestionably a core part of the battlefield.  This is demonstrated in the several well documented eye witness reports of the Battle and contemporary illustrations and plans of the field.  The Trust is of the opinion that the re-allocation of this land for mixed use (employment) from its current status as Public Open Space (to the north) and Countryside (to the south) would be inappropriate.  It will be hugely detrimental to the Battlefield, to the local landscape around it and to the local community.*

*Construction of new buildings, roads or hardstanding would involve the destruction of greenfield land, in contradiction of national and local policies and a site of National historic significance and should not therefore be considered.  There may however be opportunities for the improvement of the heritage asset and landscape of the battlefield through the removal of the rail spur and reinstatement of the land to agricultural use, as it was in 1745, or for the removal and reinstatement of the coal plant land.  These opportunities should be reflected in the Local Development Plan.*

*It should also be noted that the National Planning Framework requires agencies to work together over the redevelopment of the existing power station site, presumably in the event that the National Development of the CGGT Power Station does not proceed, to prioritise uses and to ensure that competing demands for infrastructure associated with the connection of offshore generation (the Energy Hub) are combined.  This National policy should be reflected in the LDP, which should, despite the recent unfortunate Planning Decision concerning the Inch Cape Substation, identify land within the existing Power Station site for this purpose and prevent further destruction of the battlefield.*

***4 SITE PM/PP/HSG097:*** *This site, proposed for housing development, contains Seton West Mains farm and stretches from the southern boundary of Cockenzie (Alder Road), to the A198 and between Fishers Road and The Coal Road.  The Trust is surprised and concerned to note that this land has been considered for inclusion within the IER as, along with PM/PP/OTH001, it is the core land over which the Battle of Prestonpans was fought.  The Jacobite army formed to the east side of the site and it is likely that the final Government lines were located on the western side prior to their rout to the west.*

*The Trust does not consider that this site should be considered for any form of development beyond its current agricultural use.  The development of this land, in association with the above site or in isolation, would remove the largest and most important undeveloped part of the battlefield,  The Trust is currently working towards the creation of a new centre to interpret and present the battle and to house the Battle of Prestonpans Tapestry.  There would seem to be little, if any, sense in proceeding with such a proposal if simultaneously the battlefield itself is to be covered in concrete, tarmac, houses, factories and electrical sub-stations.*

***5 PM/PP/BUS006:*** *The existing Industrial Heritage Museum at Prestongrange is considered as a location for business units.  While the Trust is wary of the potential for inappropriate or over-development on the site it recognises that some further development, either in keeping with the current museum status or directly related to the past industrialisation of Prestongrange/Morrison's Haven, might be possible.  Specifically, the re-introduction of relatively small scale pottery, glass making, Fowler's Ales or associated trades in purpose designed workshops or re-created kilns, perhaps within some of the existing derelict structures, may help the longer term sustainability of the site.  The introduction of any larger scale business units or industrial uses should be resisted and any change in policy in relation to the museum site should be accompanied by clear policies for the control and design of any development.*

***6 GENERAL COMMENTS:*** *While the Trust does not intend to comment on the detail of the MIR or IER beyond its direct impact on the Battlefield and associated sites it does not support the Preferred Policy of concentrating housing and economic development in the west of the county.  This approach would inevitably lead to the destruction of the remaining undeveloped parts and the settings of both the Prestonpans and Pinkie Cleugh battlefields.  These are Nationally important historic sites and offer opportunities both for the retention of open green space and for the development of tourism, both priorities for East Lothian. The MIR also appears to be contradictory in its promotion of sustainability, the Central Scotland Green Network (a National Development within NPF3), tourism and high quality of life while simultaneously proposing to develop on such significant greenfield sites.  This is particularly applicable to the land around Cockenzie Power Station, where a change in use along the lines currently being proposed by Scottish Enterprise (itself entirely compatible with the proposed re-allocation within the MIR) would result in the severing of the John Muir Way, closure of core paths, diversion of established roads, removal of public open space and countryside and destruction of large areas of the marine environment, threatening the livelihoods of people working in established local industries.  It is almost farcical that the IER scores the site as Neutral in terms of its effect on the Cultural Heritage and Positive in relation to its impact on the Population.  The assessment standards and ratings within the IER are, more broadly, inconsistent.*

*The Battle of Prestonpans Heritage Trust would support the introduction of more robust statements concerning the protection of the County's many historic sites, including its notable battlefields and proposed improvement, protection and interpretation of these sites.  The County has an opportunity to grow its population and enhance its environment but  the Local Development Plan MIR is heavily focussed on the promotion of sites for housing and employment.*

**for and on behalf of The Trustees**

**Battle of Prestonpans 1745 Heritage Trust**

**SYLVIA BURGESS PORTER**

**Secretary to the Trustees**