

## Members' Library Service Request Form

Date of Document	30/08/16
Originator	Douglas Proudfoot
Originator's Ref (if any)	
Document Title	Proposed Local Development Plan Technical Note 7: Planning for Coast

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
-----------------

Please indicate which committee this document should be recorded into (click on grey area for drop-down menu):

East Lothian Council
----------------------

Additional information:

Authorised By	Monica Patterson
Designation	Depute Chief Executive
Date	30/08/16

For Office Use Only:	
Library Reference	137/16
Date Received	30/08/16
Bulletin	Aug 16





proposed local development plan  
**technical note 7** 2016

PLANNING FOR THE COAST

# CONTENTS

INTRODUCTION .....	1
NATIONAL AND REGIONAL PLANNING POLICY, GUIDANCE AND ADVICE .....	1
Scottish Planning Policy.....	2
Coastal designations and landscape character .....	5
SESPLAN .....	7
COASTAL BACKGROUND AND ISSUES.....	8
Background and development pressures.....	8
CONSIDERATION OF MAIN ISSUES REPORT CONSULTATION RESPONSES .....	12
Summary of MIR Consultation Responses .....	12
PROPOSED LOCAL DEVELOPMENT PLAN APPROACH .....	15
How have consultation responses been taken into account? .....	16
Defining 'coastal' .....	18
Coastal Classifications .....	19

# LIST OF ABBREVIATIONS

<b>ABBREVIATION</b>	<b>FULL TITLE</b>
LDP	Local Development Plan
MIR	Main Issues Report
NPF	National Planning Framework
PAN	Planning Advice Note
PLDP	Proposed Local Development Plan
SDP1	SEsplan's First Strategic Development Plan
SEsplan	Strategic Planning Authority for Edinburgh & South East Scotland
SPG	Supplementary Planning Guidance
SPP	Scottish Planning Policy

## INTRODUCTION

1. East Lothian Council's Proposed Local Development Plan (PLDP) is accompanied by a series of Technical Notes that describe the approach the Council has adopted to planning issues in the preparation of the PLDP for East Lothian. This Technical Note explains the approach the Council has taken to planning for the coast, including how the PLDP meets the requirements of Scottish Planning Policy (SPP). The Technical Note covers:
  - Relevant provisions of the Scottish Government's National Planning Framework 3 (2014), Scottish Planning Policy 2014;
  - Policy contained in the Strategic Development Plan for Edinburgh and South East Scotland
  - Relevant considerations from consultation responses to the Council's Main Issues Report, and the Council's response to these;
  - The policy approach of the Proposed LDP to planning for the coast
2. This Technical Note is broadly split into sections that reflect the points above. It describes how East Lothian Council has interpreted and applied relevant national and regional planning policies specific to coastal planning.

## NATIONAL AND REGIONAL PLANNING POLICY, GUIDANCE AND ADVICE

3. Policy on the protection of the environment and planning are devolved matters. The terrestrial planning authorities remit runs to the Mean Low Water Springs, or for marine fish farming (finfish and shellfish) to 12 nautical miles. Planning for this coastal area is guided by National Planning Framework 3 and Scottish Planning Policy. Marine Scotland, a directorate of the Scottish Government, is responsible for marine planning, conservation and licensing. Their remit runs to the High Water Springs and out to 200 nautical miles. There is therefore an overlap in jurisdictions in the intertidal zone and for aquaculture where both the planning authority and Marine Scotland have responsibilities.
4. The Marine (Scotland) 2010 Act and the Marine and Coastal Access Act 2009 form the basis for planning for the marine area. The Marine (Scotland) 2010 Act introduced a new marine planning system to sustainably manage the increasing, and potentially conflicting, demands on our seas<sup>1</sup>. The Act also requires Scottish Ministers and public authorities, when carrying

---

<sup>11</sup> Circular 1/2015 The relationship between the statutory land use planning system and marine planning and licensing, see <http://www.gov.scot/Resource/0047/00479384.pdf>

out any statutory function which affects the Scottish marine area, to act in a way best calculated to further sustainable development. This includes the protection, and, where appropriate enhancement of the health of the area. They must also act in a way best calculated to mitigate and adapt to climate change, so far as these requirements are compatible with the proper carrying out of their functions. This applies both to actions within the marine area and actions which may affect it on the terrestrial side.

5. Scottish Ministers have approved a National Marine Plan. Regional Plans will also be produced, the area of East Lothian's coast to be covered by the Forth and Tay Regional Marine Plan. This has not yet been published.

## SCOTTISH PLANNING POLICY

6. The Scottish Government's National Planning Framework 3 (NPF3) is a material consideration in plan-making. The expectations of NPF3 have been reflected in the spatial strategy, development and policy requirements of the first Strategic Development Plan (SDP1) for Edinburgh and South East Scotland, prepared by the Strategic Planning Authority for Edinburgh and South East Scotland (SESplan). The East Lothian LDP must conform to SDP1. The following paragraphs set out the position of NPF3 in relation to the Coast.
7. NPF3 sets out a vision for vibrant rural areas, including the coast. It recognises the coastal environment as an outstanding, internationally important resource. The opportunity to secure growth from renewable energy generation and other economic sectors including tourism and food and drink is promoted, with infrastructure required to support this. The spatial strategy emphasises the importance of our islands and coast as an economic opportunity and a resource to be protected and enjoyed. Land use and marine planning should aim to balance development with environmental quality and activities such as fishing and tourism. Opportunities in the learning economy and energy sector, as well as aquaculture are highlighted. NPF3 is a flexible strategy for diverse places, and notes that place based development plans for coastal and island areas should recognise the role of towns as focal points for investment and transport connections.
8. NPF3 notes that many of the economic opportunities arising from the transition to a low carbon economy are emerging in our coastal areas and islands, including the deployment of offshore renewable energy. Offshore wind proposals are expected to come forward in the Firth of Forth. Major infrastructure investment is expected to provide the marine renewable energy industry with upgraded and new-build port and harbour facilities. Strengthening the electricity grid is also important in unlocking renewable resources. The more developed east coast is identified as an area of opportunity. Cockenzie is noted as an area of coordinated action, one of 5 key locations in promoting a positive, planned approach to providing low carbon infrastructure across Scotland. It is seen as a potentially important energy hub.
9. NPF3 notes that careful planning is needed to make the best use of the natural and infrastructure assets across our coastal and island areas, and to balance potentially

competing uses within often sensitive environments. The internationally and nationally important habitats and species of the coast are recognised. Issues arising from Marine Plans in the coastal interface should be reflected in land use plans. The potential impact of climate change on coastal urban infrastructure should be factored in to planning decisions.

10. NPF3 identifies 10 national developments, 4 of which could impact on the East Lothian coast (the numbering reflects that in NPF3);

- (3) Carbon Capture and Storage Network and Thermal Generation; this reflects the opportunity to provide this at existing sites. Cockenzie Power Station has now been demolished. Though there is consent for a new gas turbine power station on the site, the current owners, Scottish Power, have stated they do not intend to take this forward
- (4) High Voltage Energy Transmission Network; this is needed to facilitate renewable electricity generation and its export. As part of this, planning should enable development of onshore links to support offshore renewable energy development.
- (5) Central Scotland Green Network; this seeks a step change in environmental quality to address disadvantage and attract investment, while sustaining and enhancing biodiversity, landscape quality and wider ecosystems.
- (12) Additional Freight Capacity on the Forth; this is needed because of the strategic importance of the Forth in relation to heavily used North Sea freight shipping routes; this is likely to be focussed on existing freight ports on the Forth, which are outwith East Lothian.

11. Scottish Planning Policy (SPP) notes the challenges rural and island areas face varies across the country, from pressurised areas to more remote and sparsely populated areas, between which are extensive intermediate areas under varying degrees of pressure and with different kinds of environmental assets meriting protection. The coastline is an important resource both for development and for its particular environmental quality. The policy principles for promoting rural development are that the planning system should

- Promote a pattern of development that is appropriate to the character of the particular rural area and the challenges it faces. SPP does not require a particular approach to be followed and expects development plans to set this out.
- Encourage rural development that supports prosperous and sustainable communities and businesses whilst protecting and enhancing environmental quality; and
- Support an integrated approach to coastal planning

12. Development Plans should recognise the potentially significant impact on coastal areas from rising sea level and extreme weather events linked to climate change, and take a precautionary approach to flood risk. New development requiring new defences against coastal erosion or flooding should not normally be supported. Where appropriate, development plans should identify areas at risk and areas where a managed realignment of

the coast would be beneficial. Work in this area is ongoing (see Strategic Flood Risk Assessment).

13. SPP contains guidance on classifying the coast. Three types of area should be identified:
  - (a) Largely Developed Coast – these are a major focus of economic or recreational activity that are likely to be suitable for further development;
  - (b) Areas of Significant Constraints
  - (c) Largely Unspoiled Areas – these are generally unsuitable for development. This does not exclude important local variations, for example where there are areas of environmental importance within developed estuaries, or necessary developments within the largely unspoiled coast where there is a specific locational need.
14. Plans should promote the developed coast as the focus for developments requiring a coastal location or which contribute to the economic regeneration or well-being of communities whose livelihood is dependent on marine or coastal activities. They should provide for the development requirements of uses requiring a coastal location, including ports and harbours, tourism and recreation, fish farming, land-based development associated with offshore energy projects and specific defence establishments.
15. The unspoiled sections of the coast which possess special environmental or cultural qualities should be safeguarded. The economic value of these areas should be considered and maximised, provided that environmental impact issues can be addressed.
16. The main body concerned with planning for Scotland's seas is Marine Scotland, and Marine Planning Partnerships at the regional level. Some of the issues covered by Marine Scotland are reserved rather than devolved matters, and high level objectives are set out in the UK Marine Policy Statement. This has a vision of having 'clean, healthy, safe, productive and biologically diverse oceans and seas'. The Scottish National Marine Plan was prepared within its framework. Public authorities must have regard to this plan if they take decisions that impact on the marine area. Both marine and terrestrial planning are intended to deliver the Scottish Government's purpose of creating a more successful country, with opportunities for all to flourish. Regional Marine Plans will be prepared by Marine Planning Partnerships, and will be adopted by Scottish Ministers. East Lothian is adjacent to the Forth and Tay marine region.
17. Marine licences are required for certain operations within the sea. This includes the deposit of objects into the sea or the sea bed, construction or alteration and improvement works, and dredging. Licences are issued by the Marine Scotland Licensing Operations Team. The sea includes the area up to the Mean High Water Springs, so there is an overlap with the land-use planning regime, which extends to the Mean Low Water Springs. Works within the intertidal zone may need both planning permission and a Marine License.

## Coastal designations and landscape character

18. The Forth Estuary and islands have international importance for seabirds. This has been recognised in the natural heritage designation of much of the coastline. Firth of Forth and Forth Islands are recognised as a Special Protection Area, and Firth of Forth is also designated under the Ramsar Convention in recognition of its importance for wetland birds. These designations are underpinned by national designation as Sites of Special Scientific Interest. This designation covers some additional areas further inland, as well as a further area of coast at Barns Ness. The planning authority will consult SNH for their views in these areas. In addition, some activities there which are not development may require consent from them.

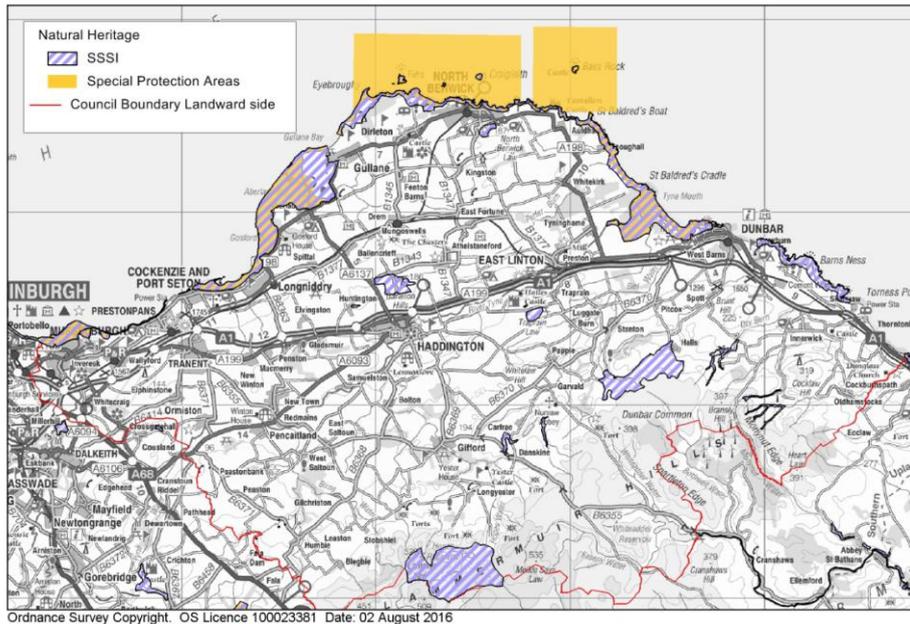


Figure 1 International and National Natural Heritage Designations affecting the East Lothian Coast

19. There are also two areas designated by the Council under other legislation, Aberlady Nature Reserve and John Muir Country Park.

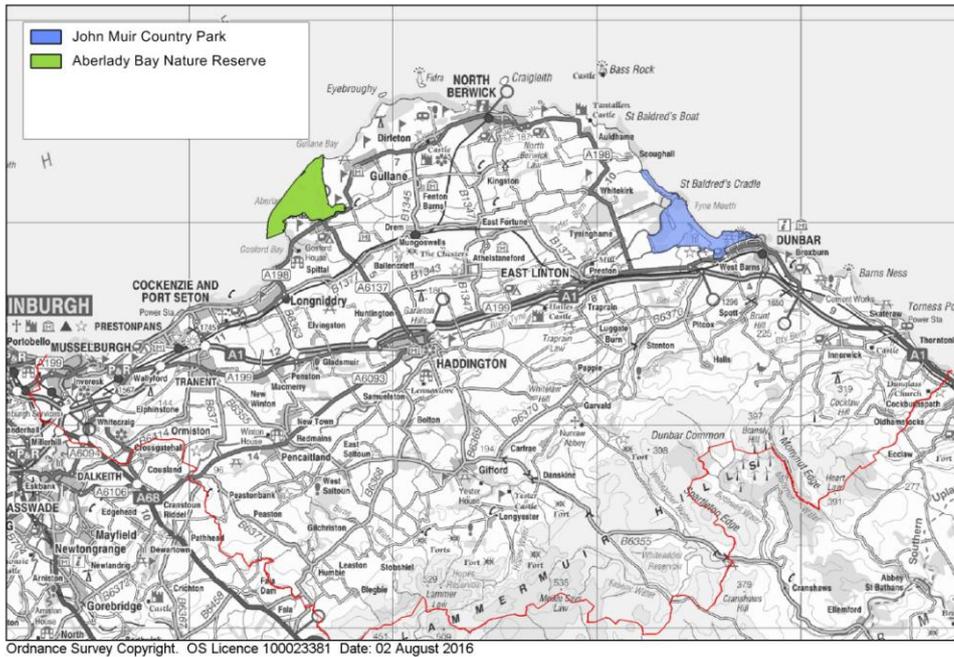
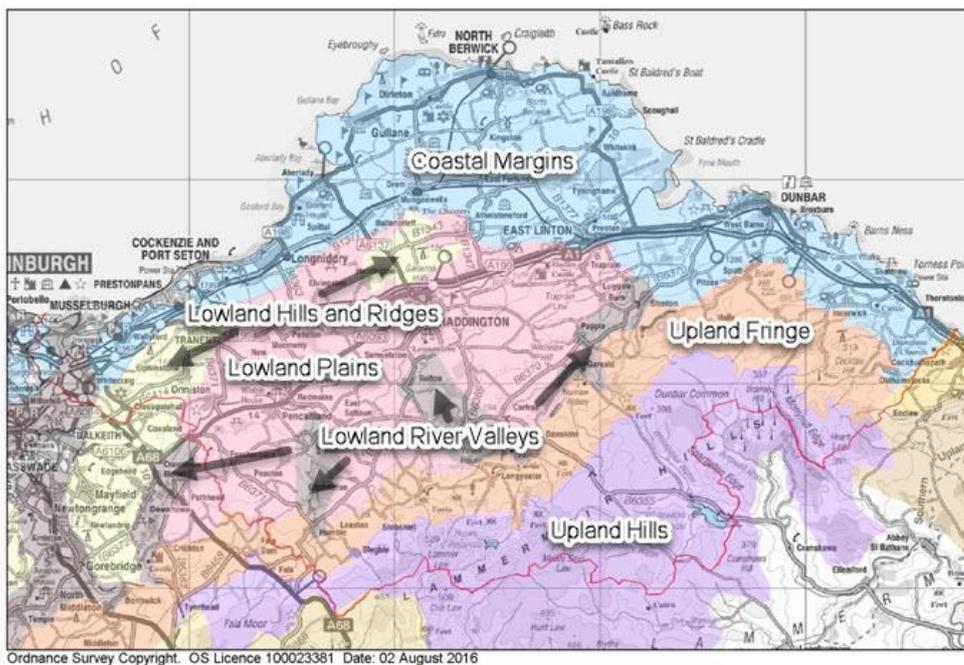


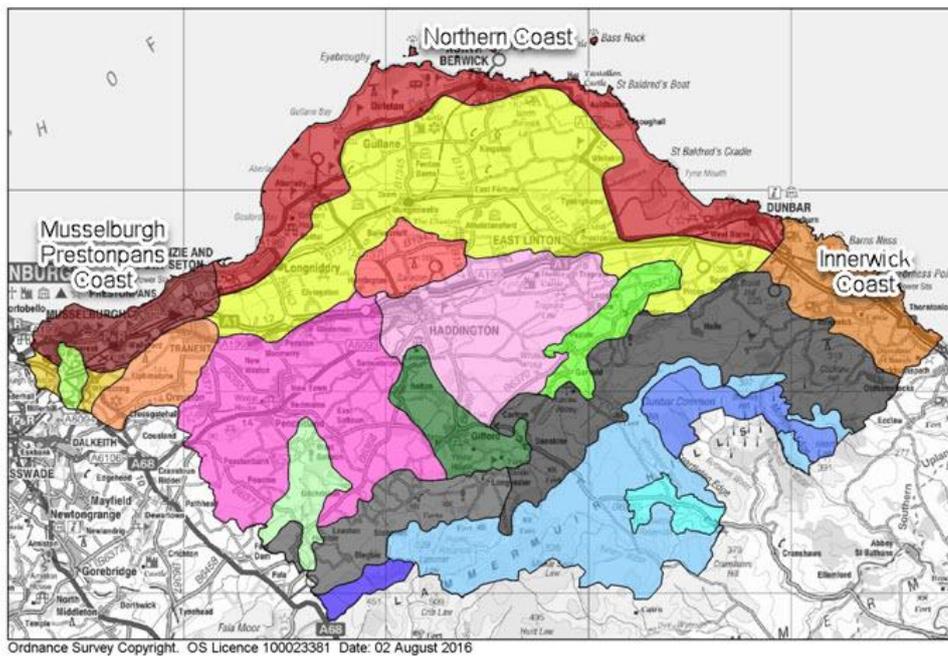
Figure 2 Council designated sites

20. In the late 1990's SNH commissioned a series of studies into Scottish Landscapes. The study for the Lothians identified a number of broad landscape character types, as shown below. Areas within the coastal margin have at least some element of a coastal character in national terms.



21. The East Lothian Landscape Review further refined this identifying Landscape Character Areas as identified below. Landscape character areas generally merge into each other, rather

than abruptly changing; the boundary line between landscape character areas is not intended to be precise. The areas considered to have a coastal element to character here were usually narrower from an East Lothian perspective.



## SESPLAN

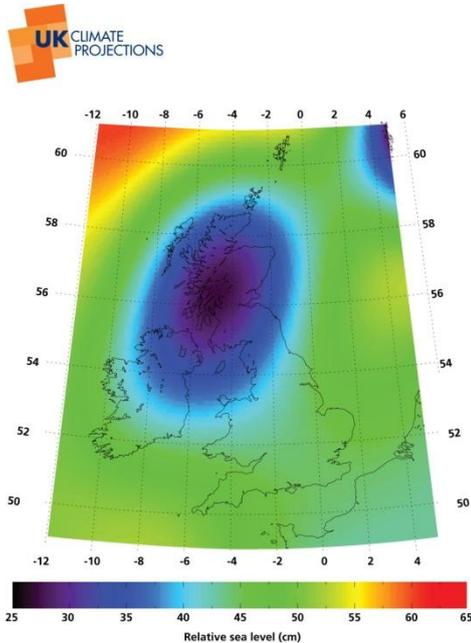
22. The Development Plan for East Lothian will consist of two parts. The first part will be SDP1. The other part will be, once adopted, the Local Development Plan for East Lothian (LDP). The emerging LDP for East Lothian must, by law, conform to SDP1. SDP1 was prepared and approved in the context of Scottish Planning Policy (2010). Since approval of SDP1, the Scottish Government has replaced Scottish Planning Policy (2010) with new Scottish Planning Policy (2014). This means SDP1 and the emerging LDP for East Lothian are being prepared under different statements of Scottish Planning Policy (SPP).
23. SDP1 recognises the east coasts high quality built and natural environment and notes that the abundance of leisure and tourism opportunities attracts many visitors and places it in high demand as somewhere to live. Certain areas of the sub-region suffer from poor accessibility and as a result are not identified locations for large scale economic development.
24. The aims of SDP1 include the conservation and enhancement of the natural and built environment, as well as promoting green networks. Policy 1B: The Spatial Strategy, Development Principles includes the instruction to Local Development Plans that they will have regard to the need to improve the quality of life in local communities by conserving and enhancing the natural and built environment to create more healthy and attractive places to live.

## COASTAL BACKGROUND AND ISSUES

### BACKGROUND AND DEVELOPMENT PRESSURES

26. East Lothian has over 40 miles of coastline, often deservedly described as ‘breathtaking’, from rocky cliffs to award winning beaches. Much of the coast is owned or managed by East Lothian Council. In addition, certain works on the coast within SSSI’s require consent from SNH as Operations Requiring Consent; these works are set out in the SSSI citation. The coast is one of East Lothian’s main assets in terms of tourism and recreation.
27. In addition to its value for recreation and tourism, the coast is also a working environment. Fishing is not as important to the economy as it has been in past times, but fishers still make their living out of harbours including Dunbar, North Berwick and Port Seton.
28. The sea is also a resource for power generation. It is used as coolant at Torness Power Station, and its future potential for wind generation means locations for cable routes connecting this capacity to users on the mainland have had to be found.
29. In the past, there have been some considerable areas of land reclamation from the sea. The main area is at Musselburgh Ash Lagoons, where pulverised fuel ash from Cockenzie Power Station was deposited. This now forms an extensive area including recreational land, wading bird habitat and areas awaiting restoration. The intended restoration of this area cannot be carried out as planned, due to the closure of Cockenzie Power Station meaning there is less material available than envisaged. The Council is working with Scottish Power and others to develop an alternative scheme. Other areas include land at Morrison’s Haven, formerly a busy harbour, and Preston Links. Some area around Torness consists of land reclaimed for use by the power station. Land formerly presumably salt marsh or similar has been claimed for agriculture to the east of Buicks Embankment, which now keeps the sea at bay.
30. Over the plan period, it is unlikely there will be significant changes in the physical location of the coastline. However, in the longer term such changes could occur. It is hard to predict these as there are many layers of uncertainty. Coastal processes are not completely understood, in particular sediment transport which could have quite an impact on the shape of the coastline whether in allowing it to accrete, or by removal of sediment which in turn could allow for greater erosion. In addition, changes associate with climate change, in particular sea level and storminess, but potentially including changes to wind and wave direction, are also likely to have an effect.

31. The UKCP09 project, which makes evidence based climate changed predictions, provides predictions on sea-level rise based on a low, medium or high emissions scenario. The following chart shows potential sea level rise under the medium emissions scenario (which is not the worst case and may not be the most likely). This shows sea levels as rising around 27 – 37 cm. This is an average; with increased storminess the highest waves may be more than 37cm larger (even assuming the medium emissions scenario).



3 Potential increase in relative sea level under the medium emissions scenario. © Crown Copyright 2009. The UK Climate Projections (UKCP09) have been made available by the Department for Environment, Food and Rural Affairs (Defra) and the Department of Energy and Climate Change (DECC) under licence from the Met Office, UKCIP, British Atmospheric Data Centre, Newcastle University, University of East Anglia, Environment Agency, Tyndall Centre and Proudman Oceanographic Laboratory. These organisations give no warranties, express or implied, as to the accuracy of the UKCP09 and do not accept any liability for loss or damage, which may arise from reliance upon the UKCP09 and any use of the UKCP09 is undertaken entirely at the users risk.

32. In 2002 East Lothian Council commissioned its Shoreline Management Plan<sup>2</sup>. The purpose of this document, which remains Council policy, was to provide a strategic framework for coastal defence in East Lothian. This involved the identification of coastal processes, as well as what was valued around the coast. Estimations of how the East Lothian coastline will evolve in the future were made difficult by uncertainties around sea level rise and degree of storminess, and an incomplete understanding of sediment transport and supply. The Shoreline Management Plan proceeded on the basis that the rate of sea level rise will increase, and that this may be associated with an increase in storminess. Sediment supply is also important, as high rates of supply can allow expansion even under sea level rise, while low supply rates will mean erosion is more prevalent. At the large scale, the future coastal

<sup>2</sup> East Lothian Council Shoreline Management Plan, Babtie Group and ABP Research and Consultancy Ltd, available at [http://www.eastlothian.gov.uk/downloads/file/10998/shoreline\\_management\\_plan\\_final\\_report](http://www.eastlothian.gov.uk/downloads/file/10998/shoreline_management_plan_final_report)

evolution of the East Lothian coast is governed by the response of headland/embayments and estuary systems.

33. Headlands are not likely to change greatly due to the solid geology forming them. The response of the bays between them is strongly governed by wave direction. Changes in wind and wave direction can result in changes to erosion or accretion within bays. Undefined sandy coasts are more vulnerable to change than rocky headlands. Generic geomorphic units were predicted to respond as follows:

*Saltmarsh:* Saltmarsh has been accreting over the 90 years prior to the Shoreline Management Plan. Under rising sea levels the response of saltmarsh and mudflat will be largely dependent on the rate of sediment supply. Where this is high, marshes and mudflats can accrete vertically and migrate landwards, though hard structures (roads, banks) constrain this, which is known as 'coastal squeeze'. Where sediment supply is low, saltmarsh in the Firth of Forth and Belhaven Bay are likely to be inundated and replaced by wider mudflats.

*Dunes and beaches:* Dunes are almost always fronted by sandy beaches. For the 90 years prior to the study, most dune/beach systems accreted at Mean High Water Springs. With rising sea levels and increased storminess, dunes and beaches would erode at their seaward faces and migrate landward if wind and backshore conditions allow. If sediment supply is high though and beaches accrete, dunes may expand seawards. Given many dune systems in East Lothian formed under conditions of sea level fall, it is likely that with rising sea levels there would be erosion. However, the dune field may move inshore, or blowouts and wash-overs may cause a breakthrough in the barrier.

*Sand beaches:* Over the 90 years prior to the study, most beaches/dunes have accreted at the Mean High Water Springs, but eroded at the Mean Low Water Springs, lead to a steeper inter-tidal profile. In the long term, sand beaches are expected to adjust in profile by migrating upwards and landwards. However, in the short term the profile may flatten with material being moved offshore. Sea level rise and storminess are expected to increase beach erosion, but is dependent on sediment transport patterns. There are a number of scenarios for beach systems. Wide sandflats, such as Aberlady Bay, will probably experience increased erosion along the shoreline, though warmer temperatures and increased winds may encourage dune development. Narrow beaches and sandflats, such as those which occur along the Dunbar coast, are likely to undergo net erosion as the coast moves towards its former main post-glacial limit, though this would provide a sediment supply which would limit the initial rate of shore line retreat.

*Spits:* historically the greatest change to the position of the coast through natural processes has come through the development of spits. The dominant trend in East Lothian has been accretion, both at Spike Island and Sandy Hirst. Sea level rise and storminess are likely to see renewed spit development though whether this is a loss or gain will depend on sediment. Since the study, anecdotally the spits have increased.

*Rocky Shores:* The coast from North Berwick east and southwards is dominated by cliffs and rock platforms. The Mean High Water Springs in these areas has remained relatively stable

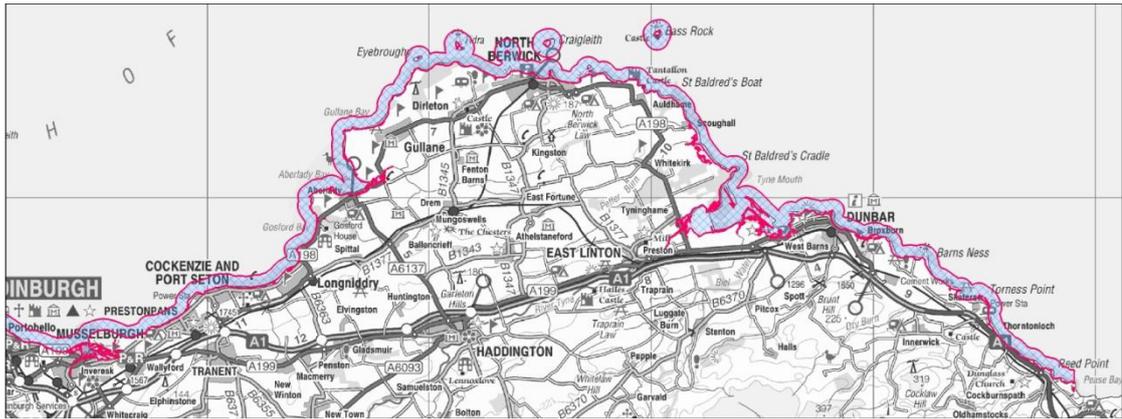
over the last century. Sea level rise and increased storminess are not expected to have a huge impact on the cliffs and rocks, though a reduction in inter-tidal width could lead to loss of sand from in front of cliffs. Some erosion has occurred since the study, notably at Winterfield in Dunbar.

*Reclaimed areas:* the inner firth area (Gullane to Musselburgh) has large areas of reclamation moving the Mean High Water Springs further seawards than its natural extent. Some of these areas have shown erosion recently and this could be expected to continue.

34. The main changes predicted in the Shoreline Management Plan were:

- By 2050 sea level rise is likely to be between 5-6mm/yr
- There is likely to be an increase in storminess in the future, which may influence incident wave heights, directions and frequencies
- Many coastal processes are dependent on sediment supply, which is poorly understood
- There is likely to be a reduction in width of saltmarshes, coupled with a replacement by mudflats
- On North Berwick coast, the dune fields (Gullane Bay to St Baldreds Cradle) may experience increase erosion from rising sea level and storms, with a possibility of onshore migration or barrier breakthrough, though this is heavily dependent on sediment supply
- On open coast (St Baldreds Boat to Cockburnspath) there will be a general tendency for the landward movement of beaches coupled with a reorientation of bays in planshape. Unless supply increases, there is likely to be continued erosion of beaches such as East Dunbar
- Spit features, such as those of Belhaven Bay, are likely to be more active showing migration onshore or extension alongshore.

35. Even without sea level rise, the coast can be subject to flooding due to storms, high tides or unusual events. SEPA has produced maps which show the likelihood of areas being flooded. The map below shows the 1 in a 1000 year flood event. This does not mean these areas will be flooded once every thousand years; they could be flooded twice in a year. However, this is the predicted likelihood of such a flooding event.



1 in 1000 year coastal flood, from SEPA data

36. Policy in the East Lothian Local Plan 2008 covered the countryside and undeveloped coast in Policy DC1. This site specific policy was applied to areas outwith urban areas that were not within the Green Belt or some areas that were covered by a specific policy of their own, such as Musselburgh Lagoons or Archerfield. Specific provisions were included that only development that required a coastal location should be on the coast. Which areas were to be considered 'coast' and which were 'countryside' were not defined; this was left to the decision maker. In practice this has not proved a satisfactory policy approach.

## CONSIDERATION OF MAIN ISSUES REPORT CONSULTATION RESPONSES

37. The following section summarises the main points made through East Lothian Council's LDP Main Issues Report consultation.

## SUMMARY OF MIR CONSULTATION RESPONSES

38. The MIR notes the approach required by SPP of identifying coastal areas that are largely developed and that may be suitable for further development, areas subject to significant constraints and that are generally unsuitable for development. It pointed out that Scottish Planning Policy says there should be a presumption against development on areas of unspoiled coast. The Main Issues Report noted that such unspoiled locations may include the Forth Islands and the Bass Rock. This document sets out the Preferred Approach to development in the Countryside and Coast, which was generally to maintain the current approach. However, it noted that the LDP proposals map should define significantly constrained coastal areas and those parts of the coast which are unspoiled. A presumption against development on the unspoiled coast would be introduced. The reasonable alternative was less restrictive to housing in the countryside, but otherwise the same in

terms of the coast.

39. SNH responded requesting that unspoiled coast be identified and defined. They recommended that background papers supporting the Proposed Plan clearly establish the criteria for identifying unspoiled coast areas and that consideration of vulnerability to coastal erosion and flooding is included for the entire coast. SEPA also consider that greater emphasis is needed on the avoidance of increased flood risk on the coast (and in the countryside). SEPA add that the LDP Proposals Map should define significantly constrained coastal areas and those parts of the coast which are unspoiled or at risk of flooding.
40. Scottish Enterprise and offshore wind interests saw the current policy (in the East Lothian Local Plan 2008) as overly restrictive and comment that the suggested approaches are inconsistent with NPF3 which identifies the Forth Coast from Cockenzie to the Torness area as a potential energy hub and area of co-ordinated action, to which no reference is made within the Main Issues Report and which covers a substantial area currently designated as undeveloped countryside and open coast. The need to protect natural resources of coast and countryside must be balanced with the role of the coast and countryside in delivering essential infrastructure developments. Offshore wind interests made similar comments on compatibility with NPF3 and request an exemption from the policy for development proposals included in NPF3, including high voltage connections. These interests considered that this projected associated development activity there would conflict with the Development in the Countryside policy.
41. Sport Scotland suggested that the recreational purpose of regional and country parks is recognised in development plans and appropriate policy developed to protect and promote them.
42. Marine Scotland did not respond to the consultation.
43. East Lothian Council Sport, Countryside and Leisure Service supported the preferred approach to maintain current policy approach to development in the countryside and coast. They suggested there was insufficient recognition of the importance of the East Lothian coast which is the busiest coast in Scotland attracting 3 million visits per year. They note the coast is a key component of the East Lothian Tourism Strategy. Few parts of the coast are not covered by natural heritage designations. Although parts of the coast will be protected by individual policies much stronger protection of the coast is needed and in particular policy should recognise and be applied to the coast as one entity. They considered residential developments on the coast have had negative impacts on the quieter refuge areas for wildlife and the wilderness for people. They query whether supplementary guidance is required for the coast. They note that Levenhall Links and the North West Quarry at Dunbar will be important as visitor attractions in future.
44. The National Trust for Scotland supported the preferred approach. They strongly backed the objective to maintain and enhance the character and appearance of the countryside and the presumption against development in areas of unspoilt coast. They drew attention to their Conservation agreements in place on the coastline around Longniddry and North Berwick as

signalling their intention to help protect the East Lothian coastline. The Scottish Wildlife Trust supported the preferred approach. In particular they would like to see the definition of 'significantly constrained coastal areas' on the LDP Proposals map and a presumption against development in those areas and areas defined as 'unspoiled'.

45. The Royal Society for the Protection of Birds noted that care should be taken to avoid increasing disturbance levels by improving access to important and sensitive coastal areas, notably Aberlady Bay. The car park here should be retained in its present size and not expanded. Paths should avoid the water's edge where birds are feeding and roosting, and salt marsh and other sensitive vegetation types.
46. Homes for Scotland supported the reasonable alternative which makes important provision for replacement dwellings (though the circumstance in which these would be allowed they consider markedly limited) and for very small scale affordable housing projects. They considers there may be scope for greater allowances still – without undermining the ambition to maintain the character of the open countryside and unspoilt coast.
47. The Architectural Heritage Society of Scotland – supported neither approach. They considered there should be a separate more restrictive protection of the coast and a more subtle and detailed control policy in the Countryside. Specific rural objectives should be proposed, such as extension of broadband, the provision of affordable housing physically adjoining existing groups of rural buildings (with limits to numbers within time periods). These more flexible policies should not apply in the Coastal Area.
48. In their responses, the vast majority of landowners, developers and agents want to see the countryside opened up to more development the most commonly mentioned being housing development.
49. Specific comments on the coast were few, however Bourne Leisure, which operates Seton Sands Holiday Park acknowledged that the strength of the tourism industry is in part dependent on the protection of the countryside and unspoiled coast. Their view was that policy must take a well-balanced and careful approach, in terms of protecting and enhancing the countryside and coast, while at the same time ensuring that appropriate and attractive tourist accommodation can be provided or enhanced, to promote local and wider economic growth and well-being.
50. Community Council had a variety of views on whether they supported the preferred approach or the reasonable alternative. Specific comments were from:
  - Dirleton Village Association, supporting rigorous restrictions against development in unspoilt coastal areas, such as the whole coastal strip from east of North Berwick to Aberlady
  - Prestonpans Community Council stated the protection from unnecessary development of areas such as “the Greenhills” and Morrison’s Haven should become mandatory.

- Gullane Area Community Council favoured rigorous restrictions against development in unspoilt coastal areas, such as the whole coastal strip from east of North Berwick to west of Aberlady

51. Local amenity groups also made some specific comments: the Association of East Lothian Day Centres looked to continue with the preferred option to protect East Lothian's unique Countryside and Coastal vistas; Fisherrow Waterfront Group and Eskmuthe Rowing noted the approach suggested is very protective of landscape and does not celebrate the potential for recreation on the Forth Estuary. More thought/guidance required as to the types of development which should be encouraged to benefit local people and the environment e.g. the LDP should make clear that the exploitation of mineral resources is not a sustainable form of development and therefore is unlikely to be acceptable whereas small local developments which will enhance Fisherrow as a visitor destination should be welcomed. East Lothian's waterfront is not a homogeneous area and a blanket protection of the coast could stifle forms of development which will support and enhance the economic well-being of the area. Aberlady Conservation and History Society stated there should be no significant housing development in the unspoilt coast and countryside of Aberlady as its character and the character of the coast communities would be irretrievably harmed by new housing disproportionate to existing development.

52. Of members of the public, a good majority supported the preferred approach, though this is based on their views on the development in the countryside as well as the coast. Most of those commenting specifically on the coast, whichever approach they supported, recognised the protection of the coast as important for the area; a few were supportive of allowing more replacement and affordable housing. Specific comments included:

- The coastline is economically very valuable and ought to be protected
- The character of the county is dependent on the preservation of the coastline
- It is vital that character of the coastal villages is protected as far as reasonably possible
- East Lothian is very much based on tourism with wonderful golf courses, walks and scenery. This must be maintained to ensure unspoiled countryside and coastline are preserved.
- Policy should be even more restrictive on development taking into account the needs and wishes of local communities
- No development along parts of the coast that are currently unspoilt
- All coastline that has not already been developed should be marked as unspoiled and protected from future development.

## PROPOSED LOCAL DEVELOPMENT PLAN APPROACH

53. The approach to the coast follows that set out in SPP. The findings of the Shoreline Management Plan (generally that large change is unlikely, and that it is difficult to predict the smaller scale changes that may occur) have been taken into account. The Forth Estuary Local Plan District Local Flood Risk Management Plan has been considered. Concerns over coastal

flooding are addressed in Policy NH11: Flood Risk, which includes policy towards coastal flood risk. This has also been considered in the allocation of development sites.

54. Policy towards the coast in particular is given in Policy DC6: Development in the Coastal Area. This requires that all development proposals in the coastal area be assessed against the relevant qualities of the coastal area. In the Unspoiled Coast, development will only be supported where there is an established need for the development and a specific need for that particular coastal location. This is a significant level of protection for these areas, with a general presumption against development.
55. In the Constrained Coast, proposals will only be supported where the development requires a specific coastal location and it is in keeping with the character and appearance of the local area. This is also restrictive to development, though it would allow proposals such as small scale recreational facilities related to water sports and extensions to existing coastal developments provided they are in keeping with the character and appearance of the area. It would also potentially allow infrastructure uses which must have a coastal location though they should locate where they can fit in with the character of the coast.
56. Proposals will generally be supported in the Developed Coast where they need a coastal location. The intention that developments that require or would benefit from a coastal location look first to the developed coast. Use that do not require a coastal location, are steered to other locations preserving the coast, and retaining coastal areas for those uses that do require such a location.
57. How the coast has been classified into these three areas, Unspoiled, Constrained and Developed, is described below.

#### HOW HAVE CONSULTATION RESPONSES BEEN TAKEN INTO ACCOUNT?

58. The majority of comments were supportive of the Preferred Approach, which included a classification of the coast and a presumption against development on the unspoiled coast. Most respondents favoured this approach, which is what has been done, though it is likely that they based their response to this question on the approach to development in the countryside as much as if not more than coastal issues, though they may have been salient for some. Specific comments were addressed as set out below.
59. SNH's comments that the unspoiled coast must be identified and defined has been taken into account and the criteria for identifying unspoiled areas are set out in the section below on Classifying the Coast. The East Lothian Shoreline Management Plan was consulted to consider vulnerability to erosion, and SEPA Flood maps were referred to in defining the coast. Coastal flooding is considered through the LDP policy on flooding rather than policy towards the coast. Amendments were made to the coastal area to include areas that are within the 1:1000 SEPA coastal flooding mapping, where it seemed reasonable to do so. However, some areas were not included as despite being at risk from very rare event coastal

flooding they appeared not to have a coastal character, in particular in parts of Musselburgh and to the west of Buick's embankment at Belhaven Bay. SEPA requested that constrained and unspoiled areas of the coast should be defined, which has been done, as do the Scottish Wildlife Trust and others.

60. Scottish Enterprise and offshore wind interests noted that some of the coast has been identified in NPF3 as a potential energy hub and area of co-ordinated action. This has been added to the plan in the Infrastructure and Resources section and a note in the preamble to Policy DC6: Development in the Coastal Area to make it clear that on-shore development proposed in association with off-shore energy projects may be acceptable. There should be a balance between coastal protection and delivering essential infrastructure. Where infrastructure is essential and must have a specific coastal location this would be acceptable under the proposed policy, though the policy does remain generally restrictive.
61. The recreational purpose of Country Parks (there are no regional parks in East Lothian) as requested by Sportscotland has not been explicitly recognised in the LDP however most of John Muir Country Park (East Lothian's only Country Park) has been included in the Constrained Coast which would require these qualities to be considered in assessing planning applications.
62. East Lothian Council Sport, Countryside and Leisure Service considered the coast was not given sufficient recognition. Mapping the coast is intended to improve this. Defining a separate coastal policy works towards treating the coast as one entity. Supplementary Planning Guidance for the coast is not currently envisaged. Levenhall Links and NW quarry at Dunbar have both been included within the coastal zone. A greater presumption against development has been given to both constrained coast and unspoiled coast as requested by the National Trust for Scotland and SWT, though where development is essential and needs a coastal location this would be supported.
63. The Royal Society for the Protection of Birds asked that care should be taken to avoid increasing disturbance to birds through increasing access to important and sensitive coastal areas, in particular Aberlady Bay. There are no proposals in the LDP to increase access there, and the definition of the coast and application of coastal policy requiring consideration of coastal qualities should ensure this happens.
64. Homes for Scotland supported provision for replacement dwellings and thought there could be greater allowance without undermining the character of the unspoiled coast. Although they state 'unspoiled coast' specifically, which as defined in the LDP would mean the Forth Islands, by context they appear to mean a wider area. No greater flexibility in the coastal area as requested has been made as it is considered this could affect the character of the coast.
65. Policy towards the coast is both more restrictive than towards the countryside in general and now includes coastal typologies, which is in line with comments made by the Architectural Heritage Society of Scotland. This chimes with the comments made by Bourne Leisure on the dependence in part of the tourist industry on protection of the coast. Tourist development

where it requires a coastal location and is in keeping with the character and appearance of the local area would be acceptable.

66. Those community councils which commented specifically on the coast favoured greater restriction on development in coastal areas, either in general or specific areas. Mostly, the policy would mean greater regard for the coastal character of an area in considering development than was the case previously. Most amenity groups also favoured this more restrictive approach. Fishherrow Waterfront Group and Eskmuthe Rowing comment that the approach does not sufficiently promote the potential for recreation on the Forth Estuary, and look for a welcome to developments that would enhance Fisherrow as a visitor destination. This area has been included in the Developed Coast, where development would be supported if it is in keeping with the relevant qualities of the coastal area and other plan policies. Recreation is not specifically mentioned as a use that might be encouraged.
67. All members of the public who made comment specifically on the coast did so to state the value of the coast and need for a protective policy towards the coast, some a very restrictive policy. The value of the coast and its special character has been recognised through a specific policy towards it and definition of the coastal area and different types of coast. One member of the public asked for all parts of the coast not developed to be marked as unspoiled, which has not been done for the reasons set out below. Two members of the public asked for no further development along undeveloped parts of the coast; this has not been done to allow for development that requires a coastal location and is in keeping with the character of the area.
68. Classifying the coast. Mapping the coast for the purposes of the LDP Proposals Map was undertaken by a cross-council group of officers. This consisted of Planners, a Landscape Architect, and the Countryside Manager (Countryside Services in East Lothian have responsibility for managing most of the coast, either through direct Council ownership or by Management Agreement with the landowner). Most of the staff involved have had at least 15 years experience of living and/or working in East
69. A half-day workshop was held where the coast was mapped and classified. The resulting map was then mapped electronically. This resulted in some interpretation and occasional changes to seek well defined boundaries recognizable on the ground (though that was not always possible). Members of the group then had an opportunity to review the maps, and discuss any comments.

---

#### DEFINING 'COASTAL'

70. The first task of the group was to identify which areas were considered coastal as opposed to countryside. This was done as a map based exercise, as well as local knowledge. In carrying out the task, the group decided to take as a starting point the main transport route around the coast. This route will be referred to as the 'Coastal Route'. This route starts with the A199 at the boundary with Edinburgh City Council area, where it runs along the northern edge of Newhailes Designed Landscape. The route continues through Musselburgh along the

A199 until Levenhall Roundabout where it turns left onto the B1348. It then follows the B1348 through Prestonpans and Cockenzie/Port Seton until it meets with the A198 at Longniddry, following this road via Aberlady, Gullane and North Berwick to join the A199 at Knowes, just west of Dunbar. At a roundabout at Beltonford the A199 meets the A1087, which continues as the main road into and through Dunbar until it meets the A1. It has at this point just crossed the East Coast Mainline Railway. Southwards of Dunbar the A1 and East Coast Mainline run parallel (and relatively close) to the coast. Whichever of these is closer to the coast (they cross over at Skateraw) is considered to be the 'coastal route'.

71. The proposition was that the area coastward of these routes were likely to be 'coastal' with the area inland of the route more likely to be non-coastal. The purpose of doing this was that the transport route is a clear boundary running all the way round the coast, containing the unarguably coastal area (i.e. beaches and the intertidal area). It seemed valid to take this as a starting point and test the assumption through close examination of the area.
72. When looking at whether an area should be considered coastal or countryside, the group discussed distance from the sea, inter-visibility of the area with the sea, historical and functional links of the adjacent land uses with the sea, and coastal vegetation or influence. Is it, to the knowledge of the group, considered rural or coastal by residents or visitors to East Lothian? This was sense-checked with the more intuitive 'ambience' – does it, as a combination of these factors or a single one, feel more rural or coastal?
73. In some areas, the Coastal Route is so close to the sea that areas further inland were considered to be distinctly coastal. In others, it was decided that there were areas between the road and the sea which were more properly rural (or purely urban) than coastal. In urban areas, generally it was not considered appropriate to take the boundary through the middle of blocks of buildings as although the buildings to the landward side may have less relationship with the coast the block as a whole would be included where it would be wrong to exclude the 'coastal' buildings, and that they made up a reasonable proportion of the block as a whole. It is recognized that this may lead to some inconsistency as far as individual buildings are concerned. The desirability of having a boundary that was recognizable on the ground was also taken into consideration.

---

## COASTAL CLASSIFICATIONS

74. Following the definition of the coast, classifying the coast was carried out according to the categories given in SPP; Developed Coast, Constrained Coast and Unspoiled Coast.

---

## UNSPOILED COAST

75. Remembering that SPP is national, and the variety of the coast around the country, it was felt the 'unspoiled' classification should apply only to areas which have had (or now appear to have had) very little disturbance and therefore appear as natural. They should therefore have some of the qualities of wildness identified by SNH ruggedness, perceived naturalness of landcover, remoteness, lack of artificial elements. Remoteness is important, as without

that the influence of development would 'spoil' them – not in the sense of making them bad, but of making them unnatural. It was also felt that to be included in the 'Unspoiled' category the area should be reasonably extensive, as otherwise its unspoiled nature would be hard to appreciate. The Firth of Forth is a developed estuary, so there are likely to be few unspoiled areas.

76. There are no areas in East Lothian which have the extensive areas of unspoiled coast of say the area around Knoydart in the north west of Scotland. However, the Forth Islands were thought to share some of its characteristics; they are free of modern development, other than the very small scale cameras of the Seabird Centre, rugged, and relatively inaccessible. Although not extensive in themselves, the area of sea in which they are located is extensive. In particular, they are not suitable for further development, and therefore merit the protection given by inclusion in the 'Unspoiled' category.
77. The other areas that were considered were the cliff areas around Tantallon/Ravensheugh and south of Thorntonloch. However it was felt that the former area was too accessible (and accessed) to be considered 'Unspoiled' when looked at a national scale. The Thorntonloch area below the cliffs does have some unspoiled qualities, however this is a very narrow area, as the land at the top of the cliffs is occupied by the A1/East Coast Mainline transport corridor. In addition, the area is influenced to some extent by views of industrial development at Dunbar Cement works and in particular Torness Power Station, which is close by.

---

#### DEVELOPED COAST

78. The Developed Coast was considered to be settlements which intersect the coast and have some coastal qualities, as well as areas which have received built development and lack naturalness of landcover or openness. Developed uses also include formal recreation, such as playing fields. Harbours were also generally included as they are enclosed by built development.

---

#### CONSTRAINED COAST

79. The Constrained Coast consists of those coastal areas which are not Developed or Unspoiled. Beach areas and intertidal areas were all considered as constrained, as they all have naturalness of landcover and almost all have a lack of built development. Golf Courses were generally considered as constrained, as these have some naturalness of topography and landcover, but also a lack of built development and openness. If the golf course use were to cease, in most cases it would be preferable for it to revert to another open use than to be taken up with built development.
80. Note that all of the offshore rocks and islands, whether mapped or not, are intended to be included in the mapping. The main offshore islands (Fidra, The Lamb, Craig Leith, and Bass Rock) are mapped and included in the unspoiled coast. The remaining offshore rocks, sand and so on, where within terrestrial planning control are all included in the Constrained Coast.

81. The thinking in detail was as follows. The writing in black is the justification for the coastal boundary. The writing in purple explains why it considered is developed or constrained coast.

Area	Reasoning (coastal boundary/type)
East Lothian/Edinburgh boundary – Port Seton	
Council Boundary to Lochend Road	<p>The Coast Route was considered to be the coastal boundary for this section. Many of the houses in this area will have a close coastal view, and have been designed and their location chosen to take advantage of proximity to the coast either for its function (e.g. close to the harbor) or the coastal views.</p> <p>All of this area other than the beach and intertidal zone is considered as developed, due to the presence of housing and urban open space. The Harbour is included as developed as it is contained by piers and therefore has a controlled appearance.</p>
Lochend Road to River Esk	<p>The area to the south of New Street was not included in the coast as this is primarily urban development for housing need without particular links to the coast. This was considered to be the case despite parts of this area being included in SEPA’s 1:1000 flood mapping. Most of the area is set back from the immediate coastal strip, and separated from it by blocks of housing, giving less visual relationship to the sea and a more purely urban ambience. The area to the north of New Street, which is included, contains Fisherrow Links, an open area with views out to sea, and Promenade, a walkway with sea views. The housing in this section seems predominantly coastal, with sea views, and close enough to be influenced by salty spray and the smell of the sea. This is also true of the housing overlooking Fisherrow Links however this was not included as being part of a large block which does not generally have a coastal character. There is some risk of coastal flooding in parts of this area.</p> <p>All of this section apart from the beach and intertidal area is considered developed due to the presence of housing, and urban open space uses.</p>

River Esk to east of Prestonpans.

The coastal boundary is considered to run along James Street, then Millhill before re-joining the Coast Route. The area south of Millhill and the Coast Route was not included as it mainly consists of urban uses which are not especially coastal (housing, Loretto School, uses related to Musselburgh Town Centre). Most of this area, and parts of the area to the south, including Pinkie St Peters Primary school grounds, are included in SEPA's 1:1000 coastal flood mapping, however the separation between this area and the sea formed by housing areas at Goose Green disrupts the visual relationships of this area with the sea as well as having a non-coast specific mix of uses. The boundary then re-joins the Coast Route. Although the housing at Linkfield Road is orientated towards the sea and may be linked to it in that the coastal location may have been part of the reason for the choice of location for such substantial houses, the balance of Windsor Park appears much less coastal, and with the creation of the Ash Lagoons there is a now a good separation in terms of distance from the sea. On balance this block was therefore considered not to be coastal, despite being included in SEPA's 1:1000 coastal flood risk mapping. The coastal zone takes in Musselburgh Race Course, which contains the Musselburgh Links Old Course. Both of these features are linked to the coast, using the flat of the links to create recreational uses; the golf course in particular has strong coastal associations. Levenhall Links are partly built on land re-claimed from the sea. This area would be sea without coastal defences, and has uses strongly linked to the sea – roosting coastal birds in wader scrapes, recreational walkway with sea views, and so is included as coast. It also includes reclaimed land at Morrison's Haven, to the boundary with Prestonpans. The boundary leaves the coast road at Prestoungrange Mining Museum, to include the museum, which is built on flat land backed by cliffs which mark the coastline from previous eras. The land of the museum is flat and orientated towards the sea, as well as containing trees which in combination with the cliffs, back and enclose the area. The area in front of the museum is generally open to the coast, while further to the east a high stone wall and trees marks a separation of the land to the south of the coastal route from the sea. This area (around a disused quarry and sewage piping station) is therefore not considered coastal. To the west of the museum, the land to the south of the coastal route is treed, covering the rise from the raised beach which is here closer to the road, and separated from the coast by the route itself and the bund around the Ash Lagoons; it is therefore not considered coastal, despite its proximity to the coast.

	<p>The area which is considered developed is the area of housing and the Race Course, as these are urban uses. Levenhall Links and the Ash Lagoons (and the small intertidal area) are considered constrained, as although much of it has been made by man it is intended to become a predominantly natural area, although with some formal recreational use also. The area at Morrison's Haven is used for informal recreation mainly, having a relatively natural feel. Development at the Mining Museum is not of a sufficient intensity or area to alter the main character of this area of coast to being Developed rather than Constrained; its less developed feel is also helped by the enclosing and natural influence of the trees to the south and lack of views to other built development.</p>
<p>Prestonpans to Port Seton (eastern boundary).</p>	<p>The area between the Coastal Route and the MLWS is considered to be coastal here. In Prestonpans this is a narrow strip, mainly containing housing, but also some retail and office use, as well as the rocky shore. This area then opens up into Preston Links and the former Cockenzie Power Station site, which are also included. This section of built development is included as there are historic reasons for the development of housing at Prestonpans in relation to the sea, namely panning for salt, and many of the houses there will have sea views. In addition, the 'glimpse' views of the sea through closes, and associated sounds and sea smell give this area a coastal character. The area of mainly housing to the south of the road has not been included. Although several of the houses in particular on rising ground will have sea views, they do not appear to have been designed to take advantage of this particularly, and this area has a more urban than specifically coastal feel. Cockenzie Power Station was located to use sea water for cooling, and is a specifically coastal use. Along with Preston Links, which offer excellent sea views, this area has a distinctly coastal feel.</p> <p>At Cockenzie/Port Seton, a wider area of housing is included north of the Coastal Route. This has been retained in the coastal area as this is the older part of the town, which has strong historic (and some current) links with the fishing industry, shown by two working harbours at Cockenzie and Port Seton. The area to the south of the coastal route has not been included as this is mainly more general needs housing with a less distinct character less associated with the fishing industry.</p> <p>The area is considered developed other than the beach and intertidal zone, due to the presence of housing, harbours, the old power station site, and semi-formal recreational use at Preston Links,</p>

	<p>together with lack of natural/semi-natural areas. NPF3 proposes use of the area at the former Cockenzie Power station for thermal generation or other uses which make the most of the areas assets. Thermal generation is a developed use. This strip is also heavily influenced by the presence of a high voltage power line, reducing its natural appearance.</p>
<p>Port Seton to Gullane</p>	
<p>Port Seton to Aberlady west boundary.</p>	<p>The coastal boundary takes in Seton Sands caravan site. This is a coastal use as the caravan park field was originally used to take advantage of its seaside location, which it still does. The field to the west (bordering Port Seton) is included as it allows the remaining sea vista from Seton House designed landscape. This area is generally below the significant rise defining the previous coastline and is thus on the raised beach. This section is considered developed due to the caravan park and lack of extensive natural areas, other than the field to the east of Port Seton which allows views from Seton House Designed Landscape to the sea, and is a paddock. This field is considered as constrained coast due to its natural landcover and lack of development. Heading east, Longniddry Golf course, including the trees towards the top of the rise at the edge of the raised beach, is included in the coastal zone. Although south of the coastal route, this area is on the raised beach or the rise at its back, affording sea views which are part of the reason for the location of and attraction of Longniddry golf course. It therefore does have coastal character. The Bents, with their sand underfoot and coastal plants (marram grass, sea buckthorn) also have a clearly coastal look and feel. Land further south, largely above the rise of the back of the raised beach, is not included due to distance from the sea, above the immediate coastal strip, and presence of built development not directly related to the sea (Longniddry village).</p> <p>The coastal boundary takes in the woodland within Gosford Designed Landscape. This was included as the influence of the sea – and sea breezes – can be clearly seen in the windshorn trees to the south of the Coastal Route within the designed landscape. The Coastal Route is almost at the sea’s edge here, and the road may be vulnerable to erosion from storms. The coast is therefore felt to extend further inland here despite the high wall separating the designed landscape from the road/sea, and which along with the trees gives the interior of the designed landscape a more rural, less coastal feel. North Wood is included as it is otherwise difficult to find a boundary</p>

	<p>recognizable on the ground, and also as part of the area is included in the SEPA 1:1000 flood risk maps. Harestanes Wood is included as the species of trees here reflect the coastal location, and it also encloses the housing at Craigiellaw. The houses at Craigiellaw are included. These were enabling development to fund Craigiellaw golf course, and are oriented to take advantage of the sea views which are one of the main advantages of this location. The coastal boundary here is taken as the southern boundary of Harestanes Wood, and the lane in front of Craigiellaw Farm Cottages, which have an open aspect towards the coast. The fields to the south between these and the coast road are not included as they lack a visual relationship with the sea, and are well enclosed by the trees and housing. This section is considered undeveloped although both the Bents car parks and the golf courses have clearly felt the human touch, as has to a lesser extent Gosford Designed Landscape through design. However, there is strong natural influence in landcover (trees, sand, rough grass) and general lack of built development (though there is sporadic housing, and infrastructure, this is small scale related to the scale of the area).</p>
<p>Aberlady to Luffness</p>	<p>The coastal boundary rejoins the Coastal route near Waterstone House, the Scottish Ornithology Club HQ. It follows this through Aberlady, but then continues east along the A6137 and the path from Aberlady to the Bickerton Strip, enclosing part of that field which is included on the SEPA 1:1000 flood mapping, and is very low lying. The boundary then follows the southern edge of woodland in the north part of Luffness Designed landscape. This woodland is considered coastal in nature as providing as setting to Aberlady Bay and being generally low lying; although some of this area has a more rural feel the woodland edge is considered the best boundary in terms of recognition on the ground. As at Gosford, the Coastal Route runs very close to the sea here, though unlike at Gosford, this area is accreting due to deposition from Peffer Burn, and is probably not therefore as vulnerable to storm erosion. This whole area is constrained coast; it is an extremely attractive part of the coastline important for both tourism and birdlife, in which it is desirable to restrict development.</p>
<p>Luffness Designed Landscape to Gullane</p>	<p>The boundary crosses the minor road from Luffness Mains to Gullane to follow the minor road from Luffness to West Fenton before turning north at a field boundary to the east of Luffness Mill House and following a drain to the south of the John Muir Way before joining that path to head to Saltcoats, south of Gullane. This takes in</p>

	<p>an area of very low lying ground included in SEPA's 1:1000 flood maps and which is tidal in the Peffer Burn at this point. Visually the Mill House relates to the coast, with the trees backing it forming a visual boundary. From the John Muir Way, a major long distance route, at this point there are views over Aberlady Bay; with the links Golf Course at Gullane, a coastal use, merging into the saltmarsh of Aberlady Bay, the area to the west of the John Muir way here is coastal. This area has been included as constrained coast as it includes golf course use and natural landcover at Luffness. This is an attractive part of the coastline important for birdlife and tourism related to bird watching, as well as recreation at Gullane golf courses, in which it is desirable to restrict development.</p>
Gullane	<p>Parts of the coastal village of Gullane have been included; the boundary follows that of Gullane Conservation Area to take in the older part of the village and the larger houses which were built to take advantage of the seaside location, which was at the time considered healthy and attractive. Gullane retains its importance for seaside holidays with a considerable amount of visitor accommodation in hotels, B &amp; B and apartments, most of which is north of the Coastal Route. This area is also sometimes affected by blowing sand (although planting to stabilise the dunes has far reduced this from the levels that historically inundated the old Church). Gullane itself is considered developed as it contains a range of uses expected in such a village – housing, retail, community facilities and open space. The Children's Golf course has been included in the developed coast due to having a sense of enclosure and generally mowed management. The remaining Gullane golf courses within the coast are included within the constrained area as though busy, and in some cases managed, they have an openness and partly natural land cover, as well as merging into the truly natural areas. This is an extremely attractive part of the coastline important for recreation, tourism and birdlife in which it is desirable to restrict development.</p>
Gullane – Belhaven	
West of Gullane – Archerfield	<p>The coastal boundary includes Muirfield Golf Course, which has open views out to the sea and a strong visual relationship with it, but not the field between Muirfield and the coastal route, which is on a south facing slope, in agricultural use and so apparently less coastal. The trees at West Strip are not included, as the golf course (Muirfield</p>

	<p>provides some separation between these and the coast; it is the rising ground of Muirfield which is the backdrop to the beach/sea rather than these trees. Heading north, the trees to the north of Archerfield Designed Landscape are included; this is because these trees are closer to the sea and do provide the backdrop to the coastal strip. The boundary follows a track through the woods around Eldbotle Park. A small strip of woodland at Eldbotle Wood is included in the coastal area, as well as the land between this and the sea. The boundary is intended to avoid inclusion of the new housing at Archerfield, as these plots are within woodland and not designed to be related to the coast directly or visually (it is intended that the woodland strip is retained to reduce disturbance and visual impact at the coast). Marine Villa is included, as this house was designed to take advantage of the coastal location and because of the woodland within its grounds. East of Archerfield Designed Landscape, a strip of woodland between the sea and the Golf Course is included, round to the car park at Yellow Craig. The woodland strips are included as coastal they are important as part of the landscape structure and appearance of the coastal strip, appear coastal by choice of species to withstand the salty coastal air, and function of stabilize the sandy soil beneath and providing shelter for the enclosed golf course and housing to the rear). The land between the woodland and the sea is generally coastal grassland, and is close to the sea; this area appears clearly coastal. <b>The coastal area is considered constrained coast due to lack of built development in the area and the desirability of protecting this very attractive section of coastline.</b></p> <p>The area between the chosen boundary and the Coastal Route contains Archerfield Designed Landscape, Golf Club and Golf Course, along with housing that was built as enabling development. The housing although close to the sea and on sandy soils, is enclosed by trees and oriented to the golf course rather than the sea. The golf course is sheltered by trees and in general, does not have sea views. The village of Dirleton is also within this area; it does have links to the sea, having holiday accommodation drawing visitors for the coastal location, however it is some distance from the sea itself. This area was therefore not included as coastal though it does have some coastal characteristics.</p>
<p>Yellow Craig to Carlekemp, North</p>	<p>From the northern corner of the car park at Yellow Craig, the boundary follows the edge of Yellow Craig Plantation. This woodland is on sandy soil, and of species which can withstand coastal air. It is often visited in conjunction with a visit to Yellow Craig sands, linking</p>

Berwick.	<p>it to the beach in terms of patterns of use. The East Links area is included as sandy, and containing coastal grasslands and flower species. The boundary does not include the land around Linkhouse Wood and Inveriel House between the boundary and the coastal route as they are enclosed somewhat by woodland from open views to the sea, although this area does have some coastal characteristics such as sandy soil. The coastal boundary does not re-join the coastal route as it reaches North Berwick but instead continues eastwards along the south side of the Golf Course until it reaches Carlekemp. This area is considered constrained as it contains little built development the presence of the sea is noticeable and expanse of rocks and sand, together with woodland intervening to restrict views of built development. It is an extremely attractive part of the coastline very important for recreation, tourism, and birdlife in which it is desirable to restrict development. The area to the south, between it and the coastal route, is not included although it does have some coastal characteristics such as views over the sea.</p>
Carlekemp – The Glen, North Berwick.	<p>Carlekemp itself is included as coastal as the woody knoll on which it sits is important in coastal views. Some housing to the west to the north of Cromwell Road and York Road is included; the boundary then follows Station Hill and Westgate into North Berwick Town Centre. It then heads up East Road, and along the top of the cliffs backing the raised beach along Glasclune Gardens to the burn through The Glen. The built up section of this area is classified as Developed Coast, as it contains development such as housing, retail, community facilities and other built development. Some parts of North Berwick were included as this village has strong historic links to the sea, as a ferry port on the pilgrimage route to St. Andrews, as a fishing village, and as a seaside resort. The housing located close to the harbor are related to its earlier history as a ferry and fishing port, and later, larger houses extending east and westwards associated with the growth of North Berwick as a seaside resort. Its desirability as a tourist destination linked to its coastal location continues. Not all of North Berwick was included in the coastal area as the links with the coast are weaker further from the sea; the housing further from the sea does not necessarily have coastal links. The beach area was considered as constrained as it is a natural area.</p>
The Glen, North Berwick to	<p>The coastal area skirts around the north of an area of housing at Rhodes Park, North Berwick and North Berwick Caravan Park. The Rhodes Park housing is not distinctly coastal. The Caravan Park does attract tourists through its relationship with the coast and has</p>

Auldhame	<p>excellent sea views, however was not included in the coastal area as the Golf Course gives separation between it and the shore, while the caravans themselves restrict views to some extent from the coastal route. The coastal boundary then rejoins the coastal route, to include the Golf Course which drops abruptly to the sea. There are fine sea views from the road here, and as the sea is a strong element of these views the flat strip of falling ground between road and sea appears as coastal. The fields on the opposite side of the road here have not been included as the road is a strong boundary here; they also appear to have more of a countryside character in the main views from the road, with coast on the seaward side and a more rural ambience inland. The boundary follows the coastal route to Auldhame, taking in a coastal strip of varying widths generally with good sea views from the road. <b>This area is considered as constrained coast as it is an very scenic part of the coast important for tourism and recreation; it also has some wildness qualities around the rocky cliffs and hidden coves as well as its value for birdlife, and it is therefore desirable to constrain development here.</b></p>
Auldhame to Buist's Embankment	<p>At Auldhame, the boundary leaves the coastal route to follow the track down towards Seacliff. The area between sea and road becomes wider here, and although there are still some sea views the sea is not as strong an element of the view from the coastal route once it has turned south at Auldhame. This land has some coastal qualities such as light soil, exposure to the haar, however, it also has enclosure in parts from woodland and topography which limits views of the sea and gives it a more countryside character. Scoughall Links area included due to the distinctly sand soil, views of the dunes and use for summer camps which is linked to its location by the beach. Lochhouses links are included again for coastal vegetation and views of the dunes, although they lack their usual undulating appearance from the inland side. This area is also very low lying and parts are included in the SEPA coastal flood risk mapping. The boundary then runs around Tynninghame Designed Landscape to Buicks Embankment, choosing boundaries with the aim of including that part section of the woodland which provides landscape structure to the immediate coastal strip (and is coastal in appearance through form and species) while excluding the parts of the designed landscape which are more enclosed and not specifically coastal in character, while following boundaries that are identifiable on the ground. <b>This area is considered as constrained coast as it is a very attractive part of the coast important for tourism and recreation; it has high scenic value and some wildness qualities around the rocky</b></p>

	<p>cliffs and expansive sands, as well as value for birdlife. To maintain the qualities of the coast which make it attractive it is important to constrain development here. Land close to the coast and with some coastal characteristics yet not directly adjacent to it was purposely excluded from the coastal zone to allow for the development of the recreational and tourist offer of this area and to relieve pressure on areas closer to the sea.</p>
<p>Buist's Embankment to Belhaven</p>	<p>The coastal boundary then heads south along the Buist's embankment before turning east to closely skirt Belhaven Bay. The area to the west of Buicks embankment was not included as coastal despite being low lying and the sea being held back by the embankment, as the embankment itself provides enclosure which makes this land appear as rural rather than coastal, and sea views from this flat area are limited. Although this land looks as if it has been worn flat by the Tyne, in fact it is relic of previously higher sea levels, so it is less estuarine in fact than it might seem. The land to the south, between the coastal boundary and the coastal route was similarly felt to have a rural character rather than a coastal one, sea views being limited by mature trees.</p> <p>The boundary continues eastwards, enclosing Hedderwick Hill Plantation, which is on very light sandy soils that the trees help stabilize. The coastline around the plantation is dynamic, with trees falling to the sea from time to time. Hedderwick Hill plantation is important in views framing Belhaven Bay, and is part of the coastal vista from many points. The boundary does not include East Links Park or Fox Lake, as although both have some elements of coastal appearance (exposure to haar, proximity to of views of the sea, flat links land,) it was considered that these were countryside uses that should properly be included in countryside. The boundary follows the minor road to East Links Park, taking in a low lying field often hosting geese and swans, included as it is low lying and close to the seam affording sea views from the coastal route. . The boundary briefly rejoins the coastal route until the Biel Water, which runs into the expansive Belhaven Bay. This area is considered as constrained coast as it is a very attractive part of the coast important for tourism and recreation; it also has some wildness qualities around the rocky cliffs, spits and saltmarsh, and value for birdlife. To maintain the qualities of the coast which make it attractive it is important to constrain development here. Land close to the coast and with some coastal characteristics yet not directly adjacent to it was purposely excluded from the coastal zone to allow for the development of the</p>

	recreational offer of this area and to relieve pressure in areas closer to the sea.
West Barns to Scottish Border Council area boundary	
West Barns to Dunbar	<p>The coastal zone boundary follows the coastal route along the A1087 from where it joins it at the Biel Water through Dunbar. This includes the low-lying, seaward part of the village of West Barns within the coastal zone. There are mature trees in this area which help frame the coast, while the use of pantiles in some of the houses there reflects past links with the sea, pantiles being used for ballast by ships coming from the Netherlands, and are common up and down the east coast of Scotland. The housing to the north can be viewed in context with sea views entering the village from the west. This gives it a coastal feel. <i>West Barns is included as developed coast, containing as it does mainly housing.</i> The caravan site at West Barns is included as coastal, again being low lying, adjacent to the coast with some coastal types of vegetation. The location close to Belhaven Bay is likely to be a reason for many visitors to choose to stay here. The trees and low shrubs here are important in framing the immediate coastal strip and restricting views in to the areas of more suburban style built environment from the coast, and therefore appear as coastal. <i>The area other than West Barns village is considered constrained coast. Belhaven Bay is one of the most scenic parts of the coast, with the Bridge To Nowhere (a footbridge over the Biel Water in the bay joining two areas of sand) arresting as it appears isolated. It is important to retain this scenic quality which could be affected by built development.</i></p>
Dunbar	<p>The coastal zone boundary follows the coastal route through Dunbar. Dunbar is a town with strong historic links to sea, particularly in the older parts by the harbor with historic and current links to the fishing industry, but also more recently through development as a seaside resort. The coastal zone aims to include the majority of these areas, while excluding more recent suburban style housing development inland, with a weaker relationship with the coast. Although some more suburban style housing is included within this area (Floors Terrace, Letham Road) some of the materials and style of the housing in this area does retain a nod to traditional east coast architecture with use of orange tiles or pantiles, white walls, as well as some use of old red sandstone that links to the stone of the Dunbar cliffs. Newer housing by the harbor in particular is a blend of</p>

	<p>vernacular and modern elements retaining a distinctly coastal feel. Around Queens Road there are substantial houses linked to Dunbar's resort heritage, and built to take advantage of sea views. The built up area of Dunbar, including Winterfield Park Playing fields, is included as Developed coast, due to the range of built environment uses here, the playing fields included as formal recreational space which does appear developed although an open use. The Harbour area is also considered developed, though some parts including the narrow entrance and Battery do have natural elements which would require consideration if further development was proposed. The rocky cliffs and coves, as well as Winterfield Golf course, are considered constrained. This is an attractive area of coastline, with wildness qualities deriving from the elemental presence of the sea and, on parts of the shore, lack of visibility of built development. Winterfield Golf course is on the cliff tops and has wide views up and down the coast. To maintain the scenic and wild qualities of the coast, which make it attractive it is important to constrain development here.</p>
<p>Dunbar to Torness</p>	<p>Leaving Dunbar, the coastal zone boundary follows the coastal route to Torness. This includes the designed landscape at Broxburn, limestone quarry and formerly quarried area, as well as Skateraw and Torness Power Station. The Dunbar Cement Works are excluded from the area as the coastal route runs to their western side here, as is the landfill at Oxwellmains. The land between sea and hills generally undulates gently towards the sea, being part of a raised beach which forms a relatively narrow strip between the Lammermuirs and the sea. The whole of this strip as far inland as Innerwick does have some coastal qualities, as the sea is visible from much of the area due to its topography, its coastal position being reinforced by containment from the hills. However, further inland than the coastal route distance and in places topography start to reduce the coastal feel, and the countryside use of arable agriculture is a strong influence also. The area within the coastal zone is included as the topography of land sloping generally toward the sea, as well as its proximity, gives a distinctly coastal feel. Torness Nuclear Power Station was located by the sea to take advantage of its cooling powers, and so is a coastal use. Most of this section of coast is considered constrained. The coast has scenic value, and wildness qualities especially close to the shore, as well as openness to coastal views from the land above deriving from topography, which increase its sensitivity to built development. The land around Torness Power Station is important to be kept clear of built development which could provide scale comparisons to this significant structure,</p>

	<p>especially as viewed from the A1 and East Coast Mainline, but also John Muir Way. The same applies to the Barns Ness Lighthouse. Although quarrying is taking place in this area, minerals can only be worked where they are found. This coastal area and views across land to the coast forms part of the first impression visitors to Central Scotland have of the area, and development here should be constrained to that which requires a coastal location and accords with the character of the area.</p> <p>Torness Power Station is included as Developed Coast, although it is one facility in an otherwise Constrained section of coast, as it is clearly a large built structure which heftily influences the surrounding area. Inclusion within the coastal zone is not intended to constrain development required in association with Torness Power Station as this would be considered as needing a coastal location as that is where Torness is.</p>
<p>Torness to Scottish Border Council boundary.</p>	<p>The coastal zone boundary continues along the coastal route until the boundary with Scottish Borders Council area. This encloses a narrow strip of agricultural fields which go almost right to the cliff top. The area then drops steeply, with interesting and attractive coastal features such as arches and stacks hidden from view beyond the cliffs as viewed from the land above. The wide beach at Thorntonloch is also not always visible. However, despite the A1 being sometimes in cutting here, the strip between it and the sea is narrow; the fields between, sloping down to the cliff tops, have a distinctly coastal feel. The and East Coast Mainline Railway here appear as a strong element in the landscape, the land to the east clearly coastal, that to the east more rural; though having a visual relationship with the sea in places its influence in terms of smell and sound are diminishing. This area is considered constrained coast. This area is the entry to East Lothian from the south, and open coastal views obtainable over the cliff top fields are attractive for travelers from the south. It is desirable that the wilder qualities of the rocky cliffs – possibly one of the wildest seeming parts of East Lothian despite the presence of Torness and a major transport corridor nearby - are not be compromised by built development.</p>

St Baldred's Craule

Tyne Mouth



Versions of this document can be supplied in Braille, large print, on audiotape or in your own language. Please phone Customer Services on 01620 827199.

**How to contact us**

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

[www.eastlothian.gov.uk/ldp](http://www.eastlothian.gov.uk/ldp)  
[www.eastlothianconsultations.co.uk](http://www.eastlothianconsultations.co.uk)  
[ldp@eastlothian.gov.uk](mailto:ldp@eastlothian.gov.uk)

