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proposed local development plan

# monitoring statement 2016



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# INTRODUCTION

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## Background

1. Since 2006 the Scottish planning system has been undergoing significant modernisation and reforms, with the Planning etc. (Scotland) Act 2006 setting out a new statutory basis for development planning. The Act requires new Local Development Plans (LDPs) to be prepared by local planning authorities to replace their Local Plans, and in the four main city regions it requires Strategic Development Plans to be prepared to replace existing Structure Plans.
2. The Planning etc. (Scotland) Act 2006 requires planning authorities to keep their development plans under review. As part of this duty authorities are required to monitor changes in the principal physical, economic, social and environmental characteristics in their district and also the impact of the policies and proposals in their existing plan. Planning authorities must publish a monitoring statement fulfilling their duty under the Act from time to time during a plan's implementation and whenever they publish a Main Issues Report (MIR). This monitoring statement has been prepared to inform and accompany the East Lothian Local Development Plan (ELLDP) Main Issues Report.
3. East Lothian's current development plan consists of the East Lothian Local Plan 2008 (adopted 28<sup>th</sup> October 2008) and the Strategic Development Plan for south east Scotland (SESplan), which was approved in June 2013 with the requirement that additional supplementary guidance to be prepared to distribute the SDP's housing requirement between the local authorities which was approved and ratified by member authorities in September 2014). SESplan replaced the Edinburgh and the Lothians Structure Plan 2015. The SDP sets the context and requirements for the review East Lothian Local Plan 2008 and preparation of the LDP.
4. East Lothian Council is preparing its new Local Development Plan as required by the Act and when adopted by the Council the East Lothian Local Development Plan (ELLDP) will replace the current Local Plan. The MIR stage is the main opportunity for consultation on the content of the plan and sets out the Council's general proposals for development in the area, including its preferred approach for locating new development in the area and any reasonable alternatives. It is the main consultation document that sets out the options that may be included in the LDP.

## Purpose of this Document

5. This Monitoring Statement is a statutory requirement under the Planning etc. (Scotland) Act 2006 and serves a number of purposes:
  - It provides evidence to support the preparation of the Local Development Plan (ELLDP)
  - It provides an overview of the economic, physical, social and environmental context within which the Local Development Plan is being prepared and how key characteristics have changed in recent years.
  - It highlights key trends and issues that need to be taken into consideration as the Local Development Plan is progressed.
  - It sets a baseline monitoring position that future monitoring can be benchmarked against.
  - It considers the performance of the existing Local Plan in terms of the impact of its policies and proposals.

## Structure of the Monitoring Statement

6. **Part 1** provides an overview of the principal physical, social, economic and environmental characteristics of East Lothian, and explains how these may have changed since 2008 (the year of the adoption of the current Local Plan). This part highlights key trends and issues that will need to be taken account of in the preparation of the new Local Development Plan. This section of the Monitoring Statement essentially describes what East Lothian is like, how it has changed, and how it is expected to change in the future.
  
7. **Part 2** of the Monitoring Statement looks at how the policies and proposals of the current Local Plan 2008 have impacted upon East Lothian. It considers what the Local Plan set out to accomplish, and the extent to which the strategy has been achieved. It considers whether the Local Plan has helped deliver the right quantity and type of development, in the right locations, and if the policies of the Plan have been successful in ensuring high quality sustainable development, supported by the necessary infrastructure and services. This section then looks more closely at the individual policies of the Local Plan and considers how successful they have been, and identifies which policies remain relevant for the Local Development Plan, which may need to be amended or deleted and if any new planning policies are required.

# PART 1: A CHANGING EAST LoTHIAN

## EAST LoTHIAN: AN OVERVIEW

8. East Lothian is located to the east of Edinburgh and extends from Musselburgh, its largest town immediately east of the capital's suburban edge, eastwards to Dunbar and beyond to its boundary with Scottish Borders Council. East Lothian has six main towns: Musselburgh, Prestonpans, Tranent to the west and Haddington, North Berwick and Dunbar further east. Haddington, whilst not being the largest town, is the administrative centre. The key transport links within East Lothian which link its settlements with each other and neighbouring areas are the strategic corridors of the A1(T) and the East Coast Main Line.



Figure 1: East Lothian Administrative Area

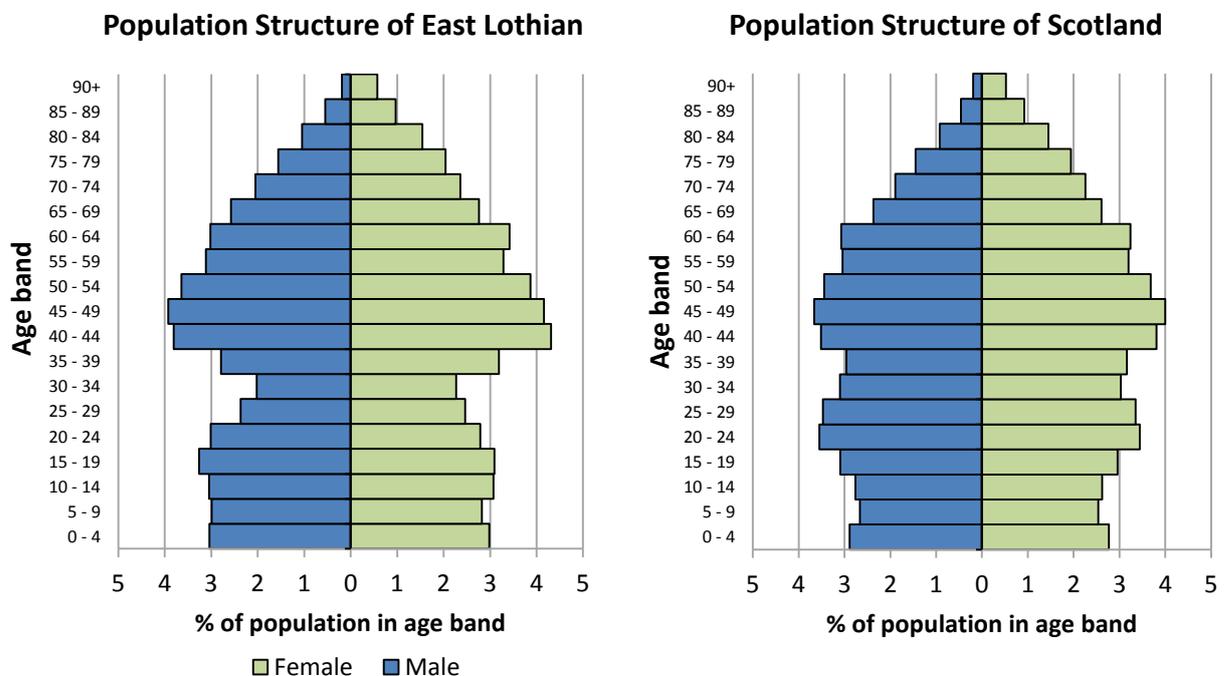
9. East Lothian covers approximately 270 square miles including 43 miles of coastline and is an area of varied and attractive landscape character comprising countryside and coast, the agricultural plain and the Lammermuir and Garleton Hills. The quality of its urban and rural environment is one of East Lothian's greatest assets. It includes historic towns and villages, designed landscapes and historical sites, buildings, landmarks and monuments.

10. Information most relevant to the monitoring of the Local Plan is contained within this report. Further information on East Lothian, including social and environmental information, can be found in the East Lothian Profile (May 2014)<sup>1</sup>.

## SOCIAL CHARACTERISTICS

### Population

11. East Lothian has a population of 99,700<sup>2</sup> with 52% (51,800) being female and 48% (47,900) male. It has a working age population of 58,902 people (60%), and a population density of 145 persons per km<sup>2</sup>.<sup>3</sup>
12. Whilst East Lothian's population structure is broadly similar to Scotland's, the population pyramids below illustrate that there is a noticeably smaller proportion of 25-34 year olds in East Lothian than across Scotland as a whole.



Source: GRO Scotland (Mid 2011 population estimates)

Figure 2: Population Structure

### Population Distribution

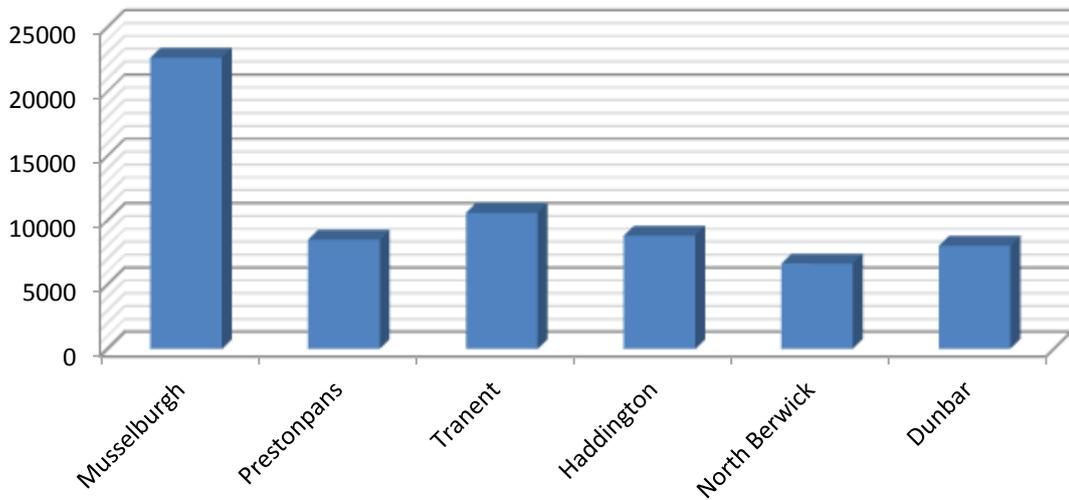
13. East Lothian's population is concentrated within its 6 main towns and almost a quarter of its population live within the Musselburgh West and Musselburgh East and Carberry wards). The remaining population outside the 6 main towns is dispersed across the rural area in villages, hamlets and farms. The grouping of settlements in the west of the area, Musselburgh, Prestonpans, Tranent and nearby villages contain around 40% of East Lothian's population.

<sup>1</sup> Available at [http://www.eastlothian.gov.uk/downloads/file/7359/east\\_lothian\\_profile\\_2013](http://www.eastlothian.gov.uk/downloads/file/7359/east_lothian_profile_2013)

<sup>2</sup> Census 2011

<sup>3</sup> General Register Office for Scotland (2012) 'Mid 2011 Population Estimates'

### Population of East Lothian's main settlements

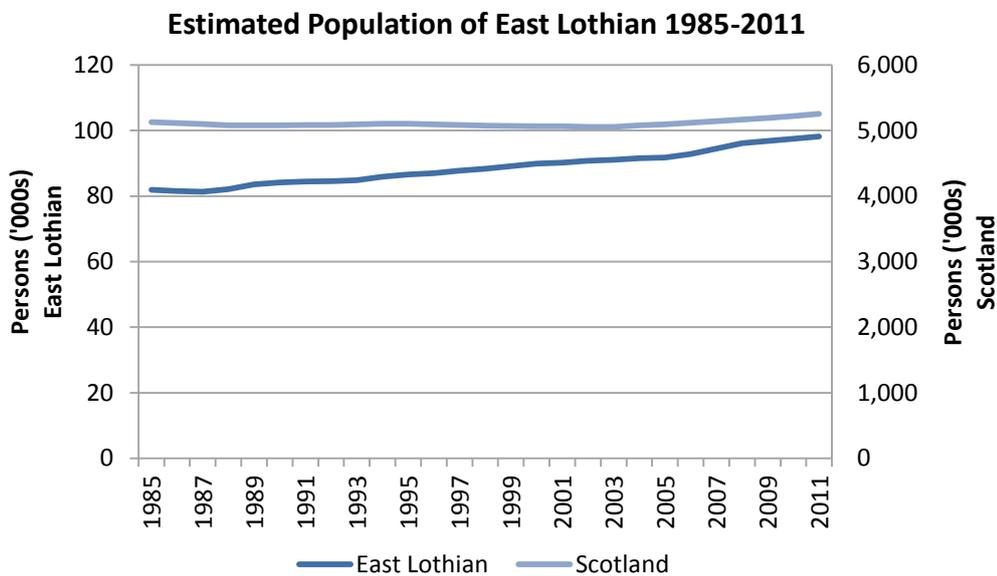


Source: 'Mid-2010 Populations Estimates for Settlements and Localities in Scotland', GRO Scotland

**Figure 3: Population of East Lothian's Main Settlements**

### Population Change

14. A key planning issue for East Lothian is its rapidly growing population. Between 2001 and 2011 the East Lothian Council area had a rate of population growth of 10.7% which is the fourth highest population growth rate in Scotland.<sup>4</sup> The graph below illustrates a much higher population growth rate for East Lothian than the Scottish average.



Source: GRO Scotland

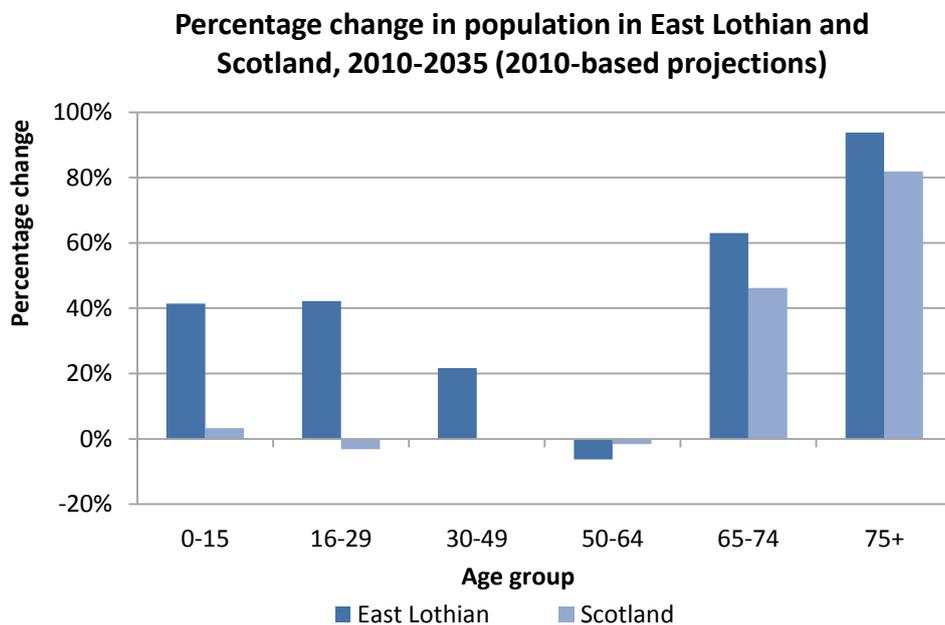
**Figure 4: Historic Population Growth**

15. The high rate of population growth is a trend that is projected to continue, with 2010 based population projections (published February 2012) forecasting continued significant population

<sup>4</sup> Census 2011 'Percentage change in total population by council area 2001-2011'

growth in East Lothian over the next 25 years. GRO(S) predicts that by 2035 the population of East Lothian will be 129,729, an increase of 33.1 per cent from the 2010 population, which is the highest projected percentage change in population of all Scottish authorities. The population of Scotland in comparison is projected to increase by 10.2 per cent between 2010 and 2035. Such a fast growing population has major implications for the planning of the area, particularly in terms of housing and infrastructure provision. Significantly East Lothian is forecast to experience the highest increase in the 0-15 age group (41% growth) of all Scottish Council areas which will present significant challenges in ensuring the funding and delivery of sufficient education and other infrastructure capacity.

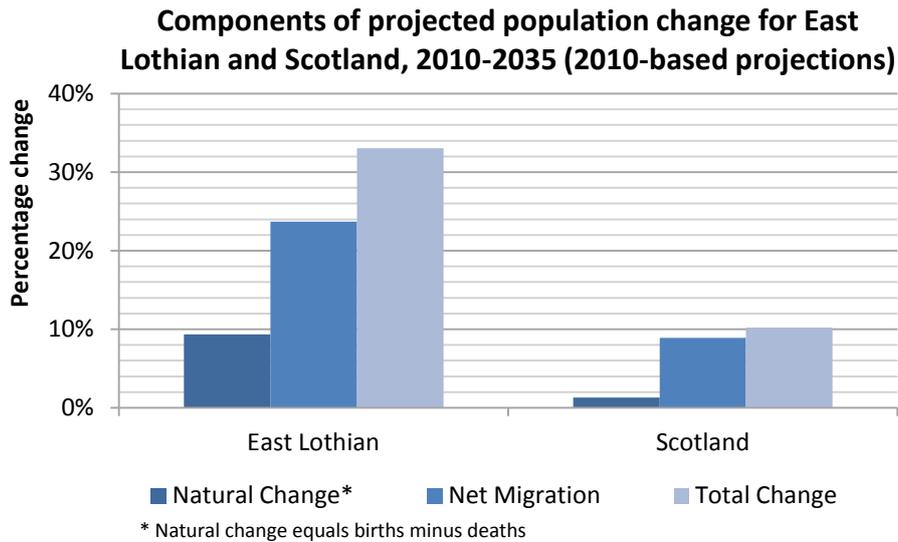
16. Over the 25 year period, the age group that is projected to increase the most in size in East Lothian is the 75+ age group in line with overall trends for Scotland. The 50-64 age group is the only group that is forecast to reduce in size in East Lothian over the forecast period.



*Source: GRO Scotland*

**Figure 5: Forecasted Population Change by Age Group**

17. About two thirds of East Lothian’s projected 33% population growth is predicted to arise from net migration into the area, with around a third attributable to natural change. East Lothian’s attractive natural and built environment combined with its proximity to Edinburgh make it a popular area to live including for those who commute to the city, and the pressure on the area to accommodate a proportion of Edinburgh’s housing need is likely to increase in future years.

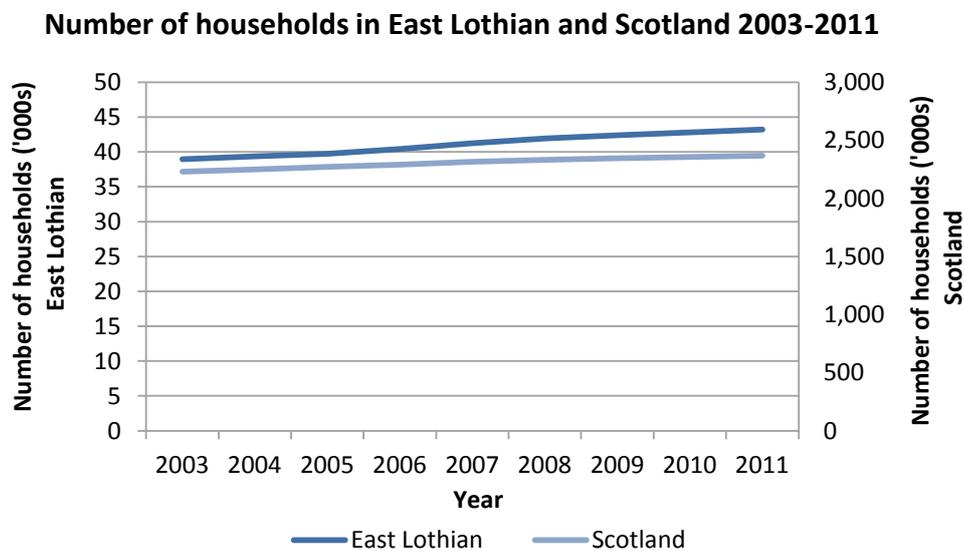


Source: GRO Scotland

**Figure 6: Components of Forecasted Population Change**

## Households

18. There are an estimated 43,215 households in East Lothian (2011 estimate), an increase of 1% from the 2010 figure of 42,798, compared with an increase of 0.5% across Scotland as a whole.

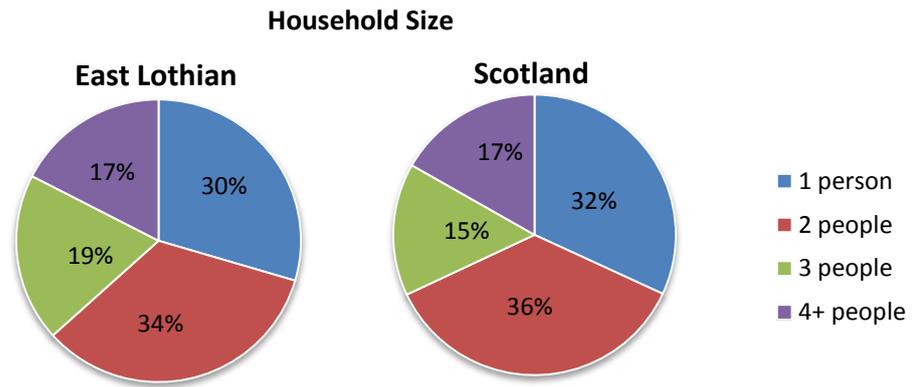


Source: GRO Scotland

**Figure 7: Historic Household Growth**

## Household Size

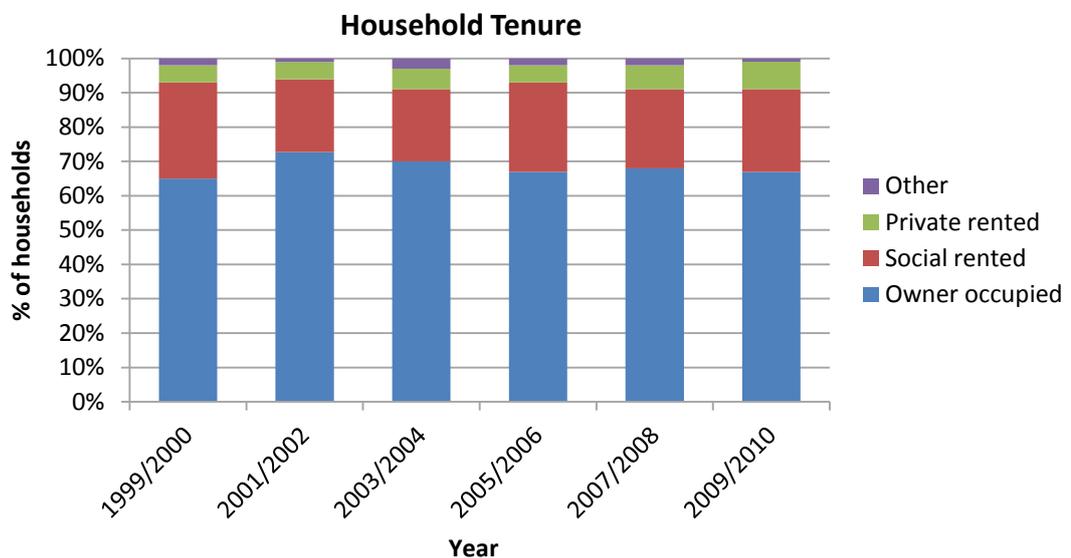
19. The majority of East Lothian's households comprise of 1 or 2 people, and East Lothian displays a very similar household size distribution to Scotland as a whole, albeit with a slightly lower proportion of 1 and 2 person households and a slightly higher proportion of 3 person households.



*Source: Scottish Neighbourhood Statistics*

**Figure 8: Household Size**

## Household Tenure



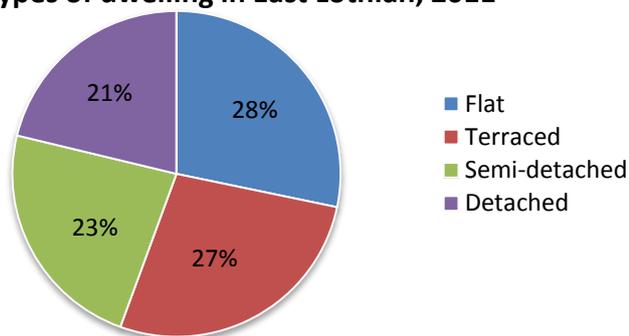
*Source: Scottish Household Survey*

**Figure 9: Household Tenure**

20. According to Scottish Household Survey data, the proportion of households in East Lothian living in owner-occupied dwellings is 67%, whilst 24% of households live in social rented accommodation and 8% in private rented dwellings. The proportion of owner-occupied dwellings has decreased slightly since its peak in 2001, with a resultant increase in households in the social rented sector. The private rented sector has also experienced growth over recent years.

## Dwelling Types

**Types of dwelling in East Lothian, 2011**



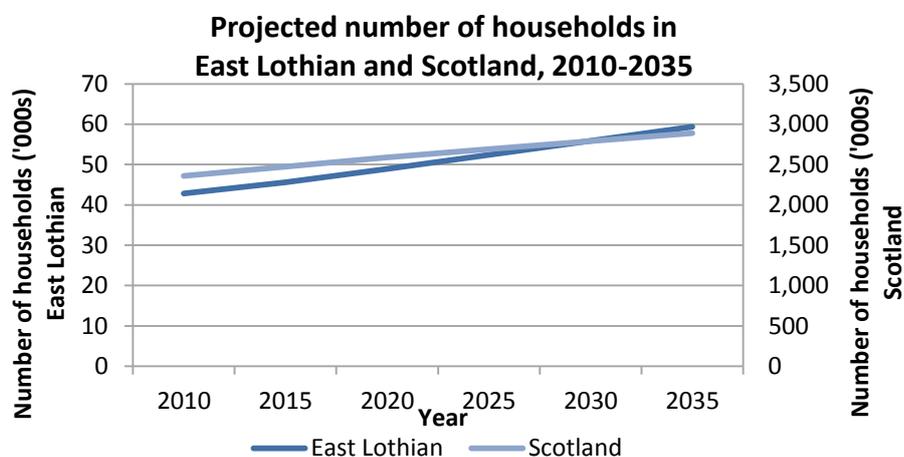
Source: Scottish Neighbourhood Statistics

**Figure 10: Dwelling Types**

21. Just over half of East Lothian’s dwellings are either flatted or terraced whilst just under half are either detached or semi-detached lower density housing. These proportions have remained largely unchanged since the adoption of East Lothian’s Local Plan in 2008.

## Household Projections

22. The total number of households in East Lothian is projected to increase from 42,800 in 2010 to 59,380 in 2035, which is an increase of 39 per cent. In comparison, across Scotland as a whole the number of households is forecasted to increase by 23 per cent over the same 25 year period,<sup>5</sup> illustrating that household growth is occurring at a much faster rate in East Lothian than across Scotland as a whole.



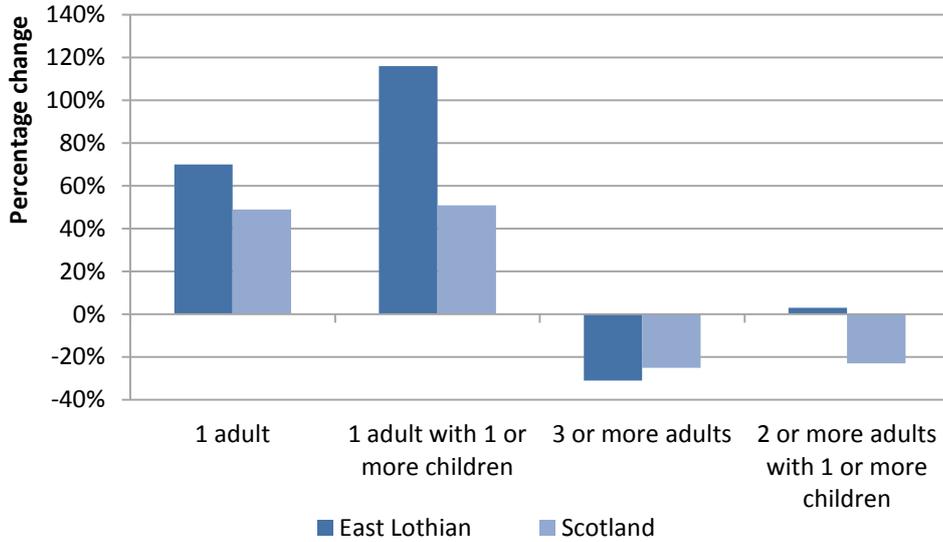
Source: GRO Scotland

**Figure 11: Household Projections**

23. In addition to a large increase in the overall number of households, household composition is also forecasted to change in East Lothian. The number of single person households is forecasted to increase by 70 per cent, and the number of single parent households is forecasted to more than double. The average household size is projected to decrease from 2.23 in 2010 to 2.13 in 2033.

<sup>5</sup> GRO Scotland

**Projected percentage change in household, by household type, in East Lothian and Scotland, 2010-2035**



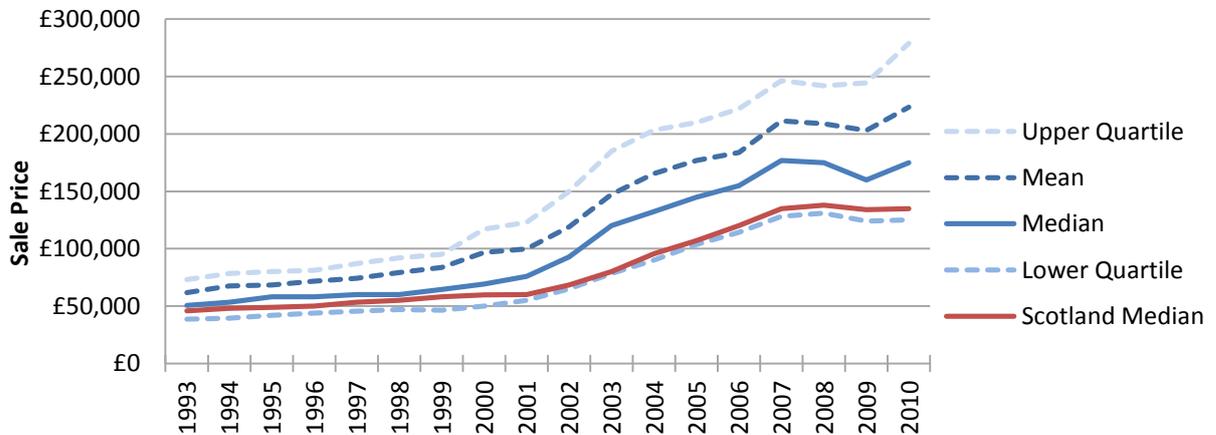
**Figure 12: Projected Change in Household Types** Source: GRO Scotland

24. The above household projections will have implications for the demand for different sizes and types of housing in East Lothian and will need to be taken account of in the preparation of the Local Development Plan to ensure that the right type of housing is delivered to meet the changing needs of households. Controlling the density of housing provided will be a key factor, to make the most efficient use of land to accommodate enough homes for a growing number of smaller households.

### House Prices and Affordability

25. The national housing market has been in overall decline since the peak of 2007 however local data indicates that East Lothian has in general shown a greater recovery than other areas. The Centre for Housing Market Analysis data indicates that house prices in East Lothian were the fourth most expensive in Scotland in 2010. The chart below shows a significant difference between the median house price in Scotland in 2010, which was £135,000 and the median house price in East Lothian which was £175,000.

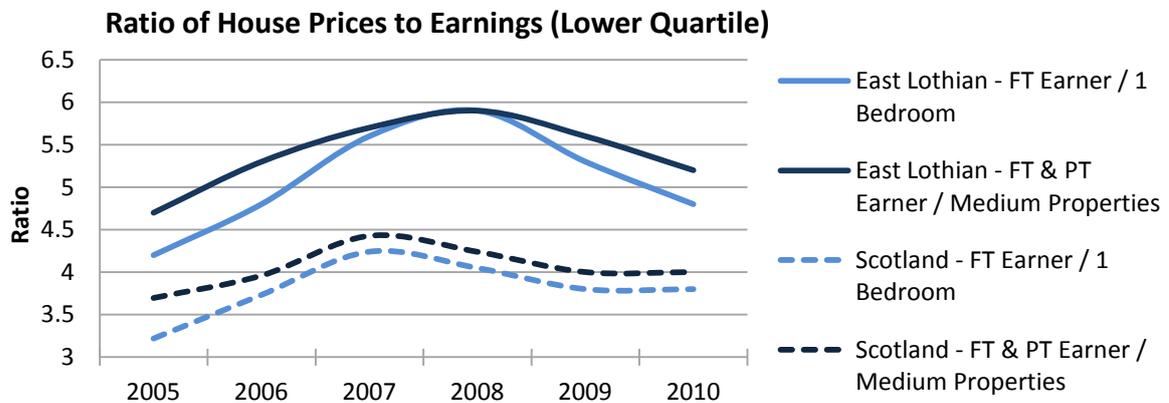
**House Sales Values in East Lothian and Scotland**



**Figure 13 House Prices**

Source: Scottish Neighbourhood Statistics

26. The high average house prices in East Lothian have inevitably had implications for the affordability of housing. Whilst earnings are also higher in East Lothian than the Scottish average, house price to earnings ratios are much higher than for the country as a whole. Whilst the ratio of house prices to earnings in East Lothian has decreased since its peak in 2008 as a result of the economic downturn, it is still significantly higher than the ratio across Scotland. This highlights that housing affordability is a key issue in the local area that needs to be addressed in the LDP.



Source: Housing Profile Page for East Lothian, Scottish Government Publications

Figure 13: Ratio of House Prices to Earnings

27. The shortage of affordable housing in East Lothian is evident in the waiting list pressure for social housing. The Council's Local Housing Strategy 2012-2017 states that the waiting list pressure across East Lothian is 8.1, well above the national average of 6.1. Areas of particular pressure include North Berwick and Dunbar where there are 10.6 and 9.8 applicants per property respectively.

## Deprivation

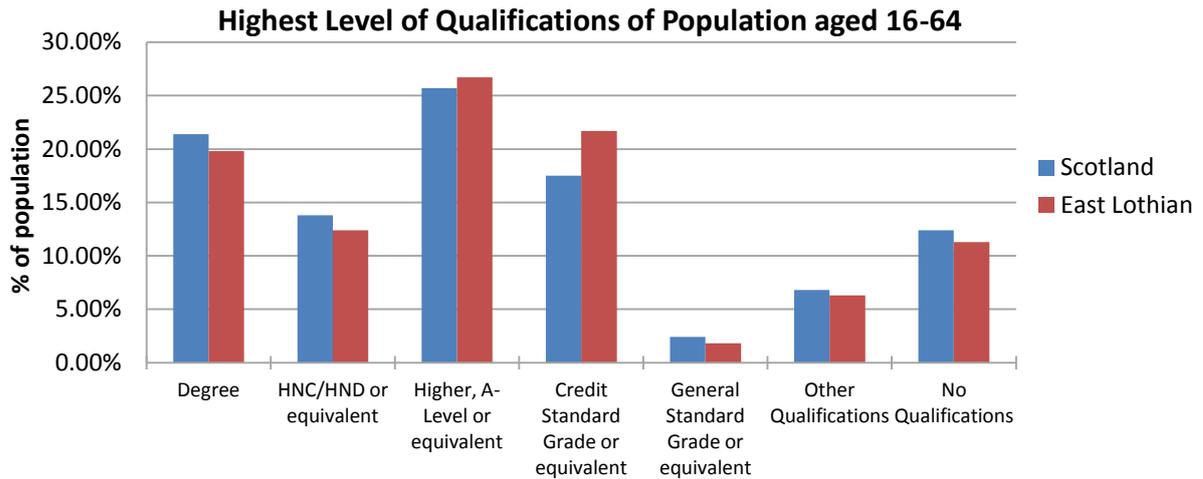
28. The following maps illustrate the national ranking of areas (data zones) in East Lothian in terms of their overall relative levels of deprivation (Scottish Indices of Multiple Deprivation (SIMD) 2012 – Overall Rank). The overall ranking takes into account income, employment, health, education, housing, geographic access to services and crime deprivation. The maps demonstrate that whilst the majority of East Lothian benefits from very low levels of deprivation relative to other areas, there are pockets of significant deprivation within some of the settlements in the west of the area. This is highlighted in Figure 15 which provides a zoomed in snapshot of the Musselburgh, Prestonpans, Cockenzie/Port Seton and Tranent area. There is significance variation between the least and most deprived areas in East Lothian, as whilst the least deprived datazone area (in Longniddry) in East Lothian ranks the 6,457<sup>th</sup> least deprived area in Scotland out of 6,505 datazone areas in total, the most deprived datazone (in Tranent) ranks 658<sup>th</sup> deprived.



29. According to the 2012 SIMD, three data zones in East Lothian are categorised within the 15% most deprived areas in Scotland, two in Prestonpans and one in Tranent. Only two of these areas were also classified as within the 15% most deprived areas in Scotland in the 2009 SIMD. The inclusion of an additional area in Prestonpans represents a worsening in deprivation levels relative to other areas since 2009.
30. Some key findings from the 2012 SIMD relating to East Lothian are:
- The level of income deprivation in East Lothian is below that in Scotland as a whole. In the SIMD 2012 income domain, 10.6% of the population of East Lothian were income deprived. This compares to 13.4% across Scotland as a whole.
  - The level of employment deprivation in East Lothian is below that in Scotland as a whole. In the SIMD 2012 employment domain, 10.4% of the population of East Lothian aged 16-60/64 were employment deprived. This compares to 12.8% across Scotland as a whole.
  - In the education domain in SIMD 2012, 5 (4.2%) of East Lothian's 120 datazones were found in the 15% most deprived datazones in Scotland, compared to 6 (5%) in 2009, 7 (5.8%) in 2006 and 13 (10.8%) in 2004, suggesting a relative improvement.
  - On the housing domain in SIMD 2012, 1 (0.8%) of East Lothian's 120 datazones was found in the 15% most deprived datazones in Scotland.
  - In the access domain in SIMD 2012, 17 (14.2%) of East Lothian's 120 datazones were found in the 15% most deprived datazones in Scotland, compared to 17 (14.2%) in 2009, 14 (11.7%) in 2006 and 18 (15%) in 2004.
  - In the crime domain in SIMD 2012, 12 (10%) of East Lothian's 120 datazones were found in the 15% most deprived datazones in Scotland, compared to 9 (7.5%) in 2009 and 9 (7.5%) in 2006.
31. The SIMD considers how many datazones in each local authority area lie within the 15% most deprived datazones in Scotland, as this provides an indication of the spread of deprived areas across local authorities. In the SIMD 2012, 3 (0.3%) of the 976 datazones in the 15% most deprived datazones in Scotland were in East Lothian; this compares with 3 (0.3%) in 2009, 1 (0.1%) in 2006 and 0 (0%) in 2004. This trend suggests that over the last 8 years there has been a slight increase in deprivation in East Lothian relative to other areas, as it now contains areas within the 15% most deprived in Scotland. This does not mean that these areas have necessarily become more deprived in absolute terms, but they have become relatively more deprived when considered against other areas of Scotland.

## Qualification levels

32. East Lothian has a lower proportion of its working age population with no formal qualification when compared with Scotland as a whole. However it has a slightly lower proportion of working age population with a HNC/HND or degree qualification than Scotland as a whole.

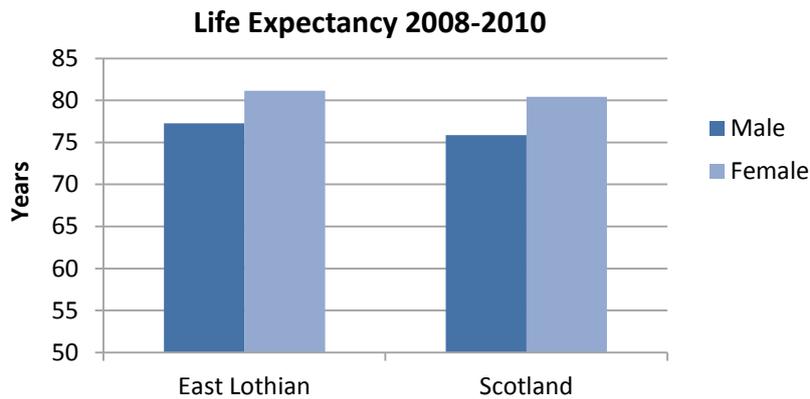


Source: Local Area Labour Markets in Scotland Statistics from the Annual Population Survey 2010

Figure 16: Qualification Levels

## Health

33. Life expectancy in East Lothian is greater than the average for Scotland with life expectancy at birth currently being 77.3 years for males and 81.2 for females.



Source: GRO Scotland

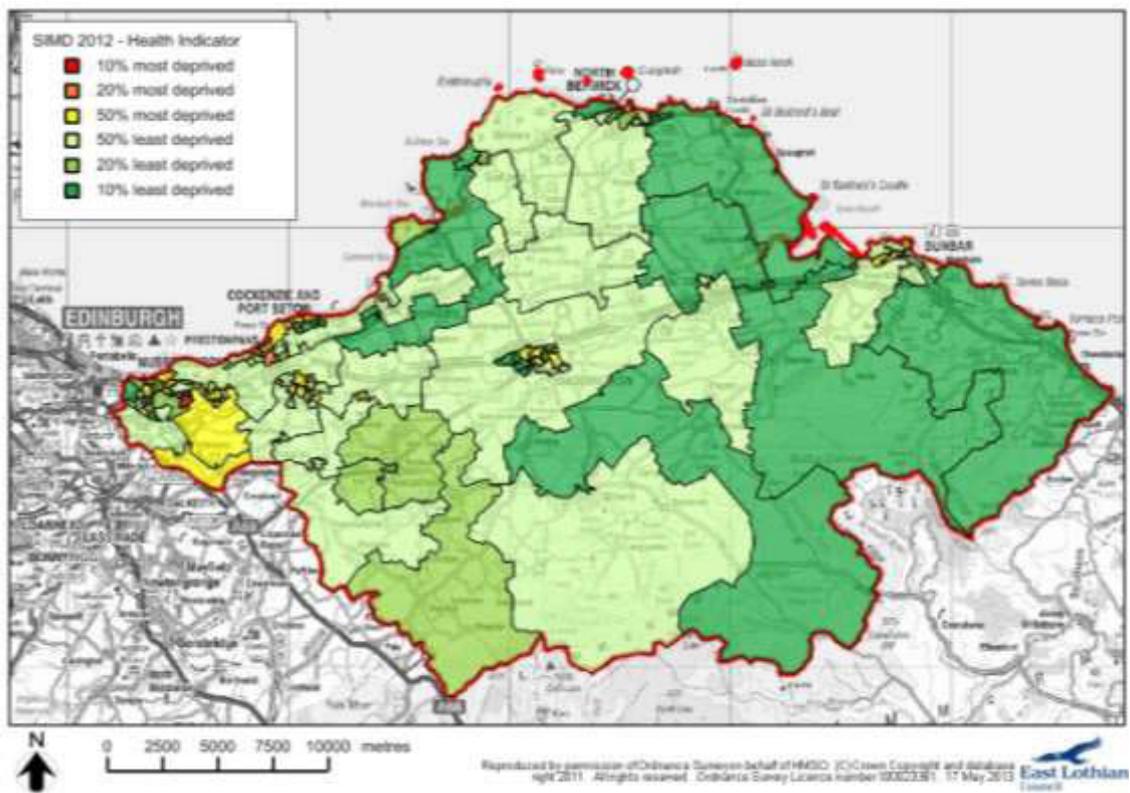
Figure 17: Life Expectancy

34. Whilst life expectancy has increased over the past 10 years, the rate of increase (3.5% and 2.2% for males and females respectively) is slower than for Scotland as a whole (4.1% and 2.6% for males and females respectively). The East Lothian life expectancy figure conceals some stark variations within the County, with some areas having life expectancy below the Scottish average. Men in Wallyford are expected to live on average 72.8 years which is 7 years less than men in Gullane/Drem (79.9 years), and women in Tranent are expected to live for 76.6 years which is 8 years less than women in Longniddry/Aberlady (84.7 years).<sup>6</sup>
35. The Scottish Index of Deprivation provides an indication of relative health deprivation across Scotland and takes into account a number of factors in calculating the indicator including death rates, hospital stays, people in receipt of benefits due to ill health/disability, mental illness and

<sup>6</sup> Local health information provided by NHS Lothian.

occurrence of low birth weights. Only 2 of the 120 datazones in East Lothian (1.7%) fall within the most 15% health deprived data zones in Scotland, indicating that, overall, health deprivation in East Lothian is much lower than across Scotland when considered as a whole.

36. However there are significant variations within East Lothian and pockets of higher health deprivation are evident in parts of settlements in the western area of the County, as illustrated in Figure 18 and Figure 19 below. The areas of poorer health in East Lothian align closely with areas of relative economic deprivation highlighting the strong interrelationships between these factors.



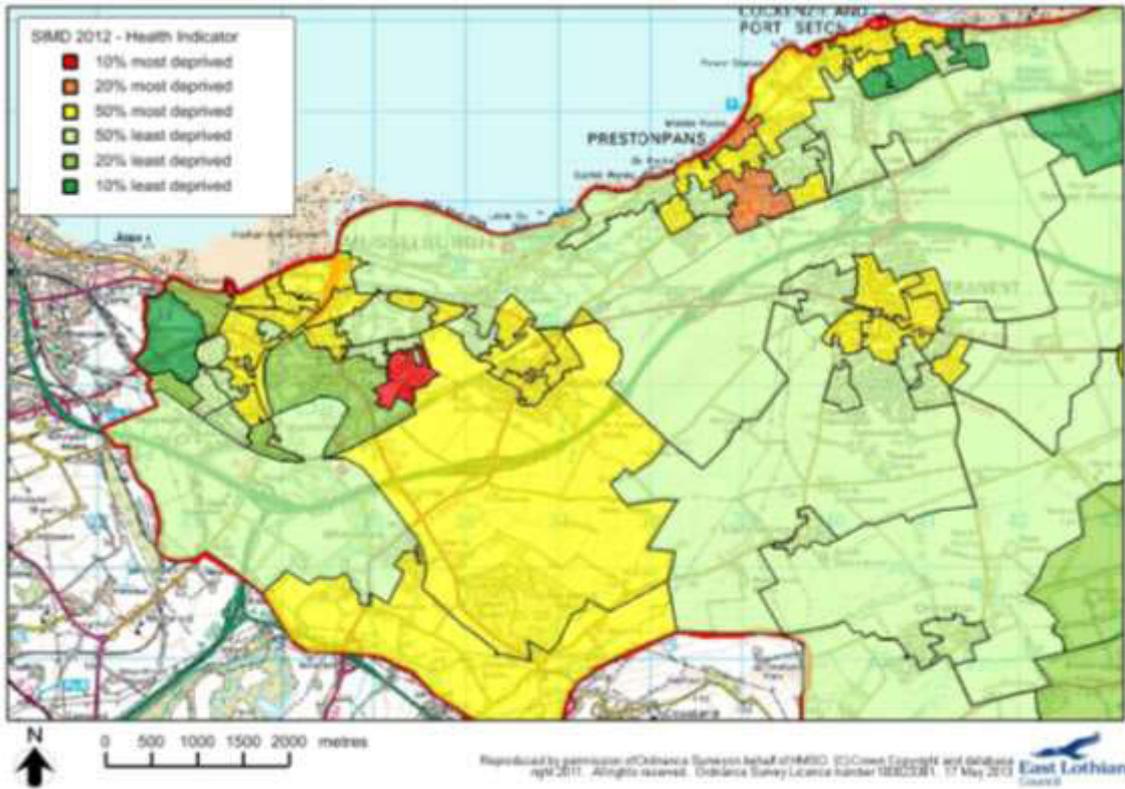
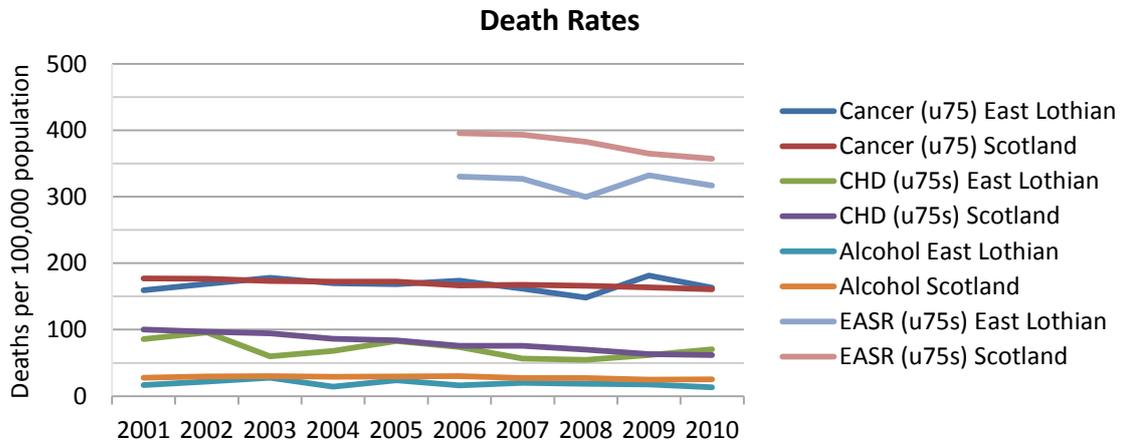


Figure 19: Health deprivation in western areas of East Lothian



KEY: CHD – Coronary heart disease  
EASR – European age-standardised death rate per 100,000 population

Source: Scottish Neighbourhood Statistics

Figure 20: Death Rates

37. Death rates in East Lothian are generally lower than for Scotland as a whole; however, death rates for cancer and coronary heart disease in East Lothian appear to have overtaken the Scottish average in 2010. Mortality trend data provided by NHS Lothian reveals variation in mortality rates between different wards in the County, with Fa'side and Musselburgh East and Carberry wards consistently exhibiting mortality rates which are higher than the Scottish average.
38. Information provided by NHS Lothian highlights particular health issues in Fa'side and Musselburgh East and Carberry wards, where cardiovascular disease and premature cancer mortality is higher than other areas in East Lothian, and Lothian and Scotland averages, and there is an indication that

death rates are rising in these wards. Risk factors for cardiovascular disease include obesity, physical inactivity, poor diet, smoking, air borne pollution and diabetes. A number of these risk factors can be influenced by the physical environment for example air pollution arising from increases in road traffic, or poor accessibility to good quality sports facilities or outdoor recreation opportunities. The MIR will therefore need to identify ways in which the Local Development Plan can contribute towards creating a healthier environment for East Lothian's population. This includes factors such as promoting active travel and recreation opportunities, and promoting development within walking distance from facilities and services.

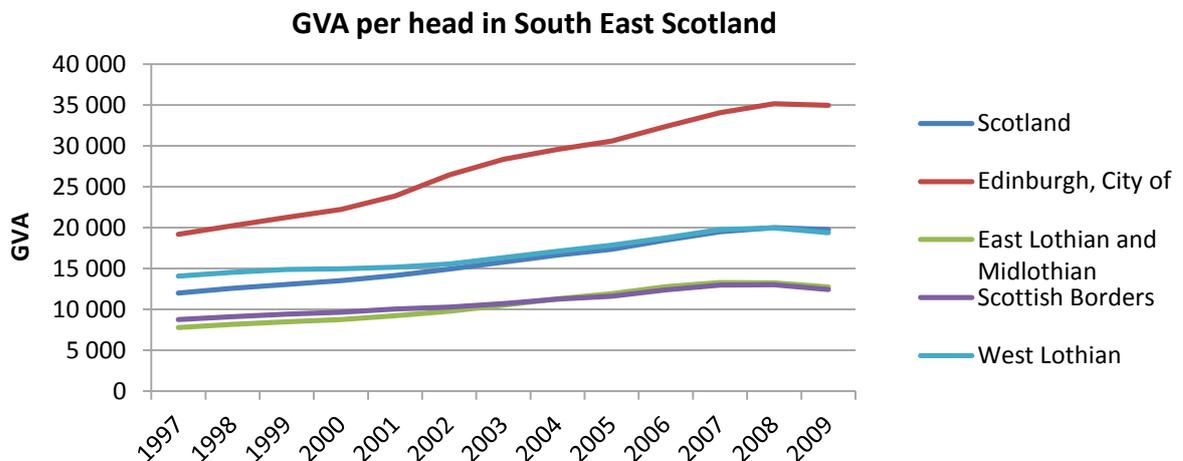
### **Social Characteristics: Key Issues for ELLDP**

- Managing the impacts and demands of the projected significant population growth – an increase of 33.1% between 2010-2035
- Providing the right scale and type of housing, infrastructure and services for the large projected increase in the number of households – 39% increase between 2010-2035
- Planning for the forecasted growth in different age groups in particular the population aged 75+, and children especially with regards housing provision and social infrastructure
- Increasing the provision of affordable housing to tackle the high house price to earnings ratio.
- Exploring how the spatial strategy can help tackle social, economic and health inequalities across East Lothian, including by working with relevant stakeholders.

## ECONOMIC CHARACTERISTICS

### Economic Performance

39. A key measure of economic performance is Gross Value Added (GVA). The ONS provides information on GVA and reports on East Lothian and Midlothian as a combined area. ONS data indicates that GVA per head in East Lothian and Midlothian has risen over the period 1997-2009. However, unsurprisingly as a result of the economic downturn, GVA growth slowed and decreased between 2008-2009 to £12,758 per head. GVA per head in East Lothian and Midlothian is significantly lower than for South East Scotland as a whole where the overall GVA measure is substantially boosted by the City of Edinburgh's economic performance.



Source: Office for National Statistics

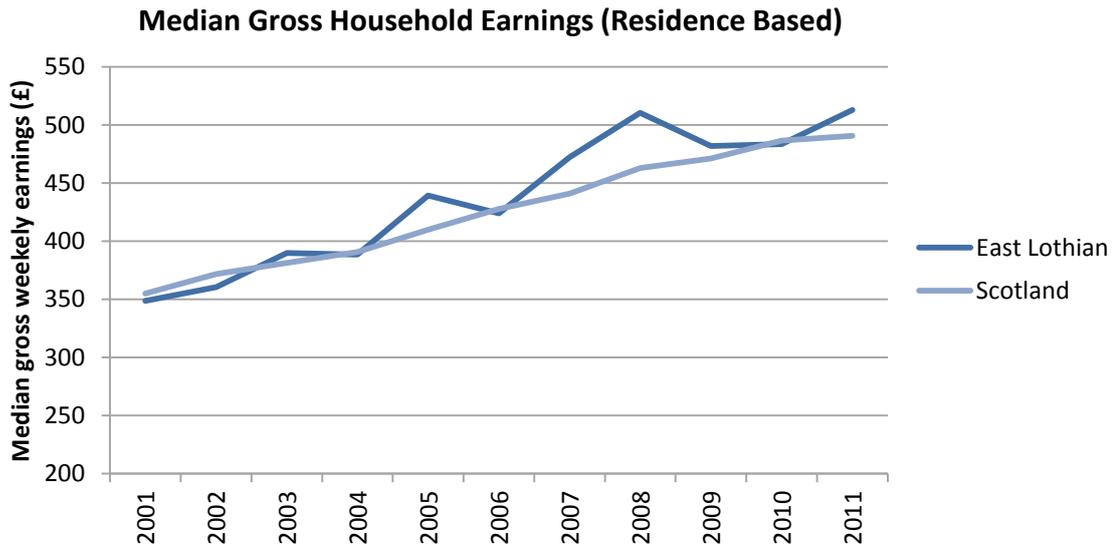
Figure 21: GVA per Capita

40. The estimates of GVA per head are calculated by dividing the estimate of workplace GVA for an area by the resident population. Therefore areas with significant levels of outward commuting such as East Lothian tend to have lower estimates of GVA per head than areas with high levels of inward commuting such as Edinburgh.

### Household Income

41. Following a reduction in median household earnings in 2009 and 2010, likely to have been as a result of the economic downturn, in 2012 household earnings rose to £512 per week in East Lothian, whilst the average household earnings across Scotland as a whole sat at £498 per week. Between 2008-2012 weekly median household earnings have only increased by £1.90 per week in East Lothian whilst across Scotland as a whole they have risen by £35.40.<sup>7</sup>

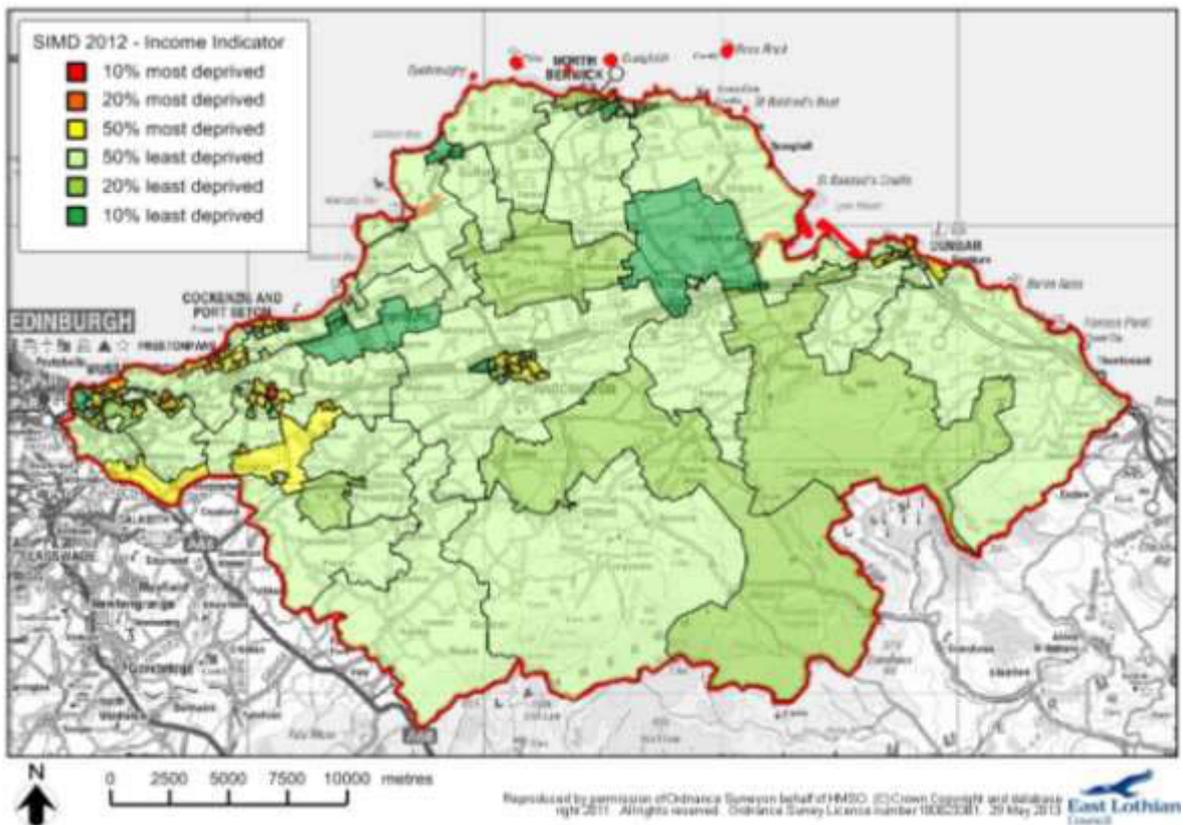
<sup>7</sup> Based on information from Scottish Neighbourhood Statistics – Median gross weekly earnings for full-time employees (residence based).



*Source: Scottish Neighbourhood Statistics*

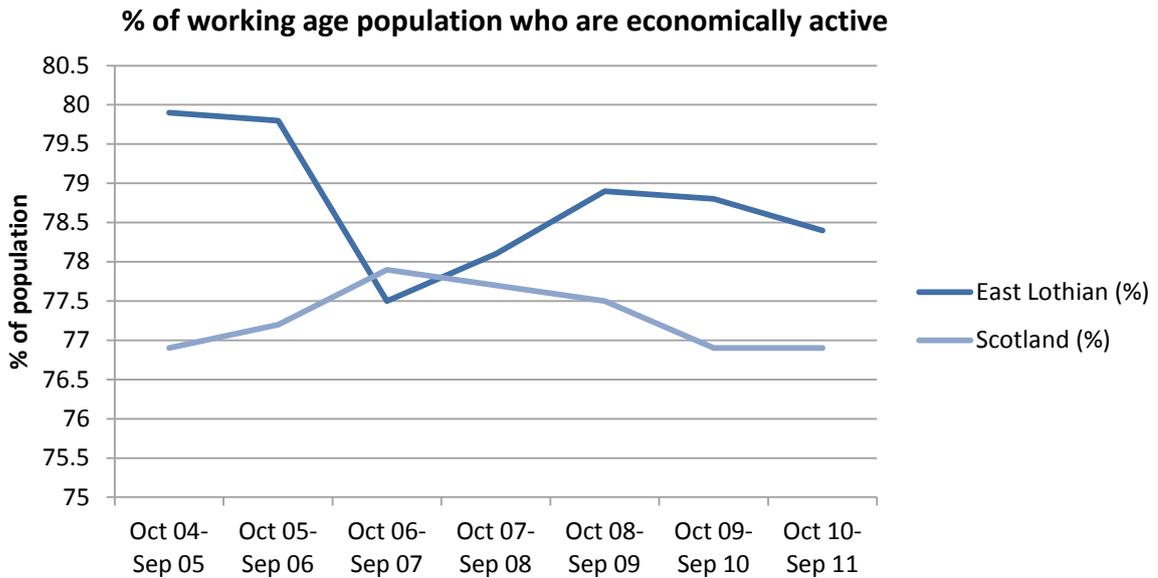
**Figure 22: Median Household Earnings**

42. Whilst median household earnings in East Lothian are higher than the Scottish average, this general measure conceals significant differences between different areas in East Lothian. The map below, based upon the Income Indicator in the Scottish Indices of Deprivation, shows stark variations across the County, with pockets of significant income deprivation in the western settlements of Musselburgh, Tranent and Prestonpans.



## Economic Activity

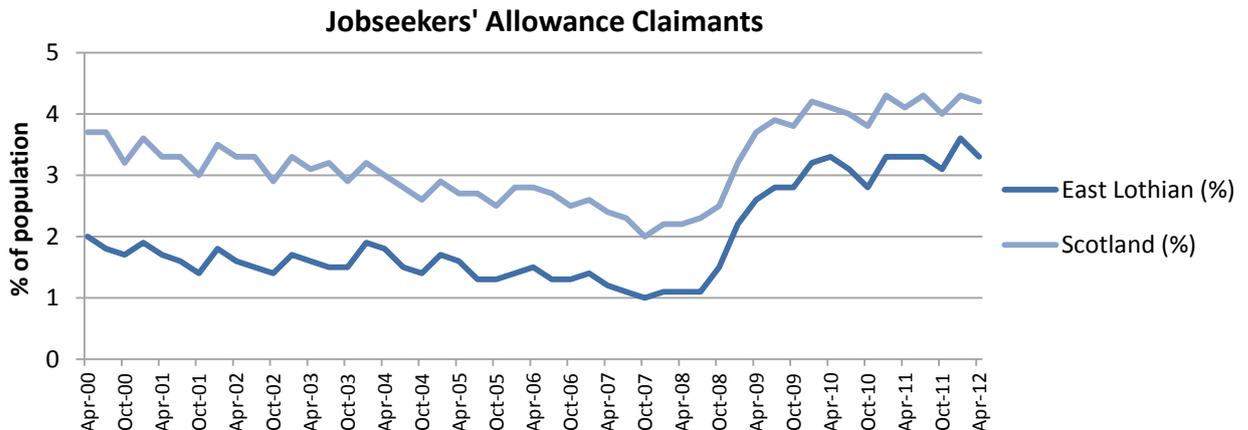
43. 80.9% of East Lothian’s population is economically active, compared with 77% of the Scottish population and with the exception of 2006-2007 the proportion of economically active people in East Lothian has been higher than for Scotland as a whole<sup>8</sup>. As would be expected from an area with higher levels of economic activity, unemployment rates in East Lothian are lower than the Scottish average as is the proportion of the population claiming Jobseekers’ Allowance benefits. Unemployment rates have increased from 3.4% in 2006 to 6.1% in 2013, but are still less than the national average which in 2013 sat at 7.7%.<sup>9</sup>



Source: NOMIS

**Figure 23: Economic Activity**

44. Whilst the proportion of East Lothian’s residents claiming Jobseekers’ Allowance is consistently less than the proportion for the country as a whole, there has been a significant increase in both East Lothian and Scotland since the economic downturn of 2008. The gap between the percentage of East Lothian residents claiming Jobseekers’ Allowance and the proportion of claimants in Scotland as a whole has also narrowed during this period.



Source: NOMIS

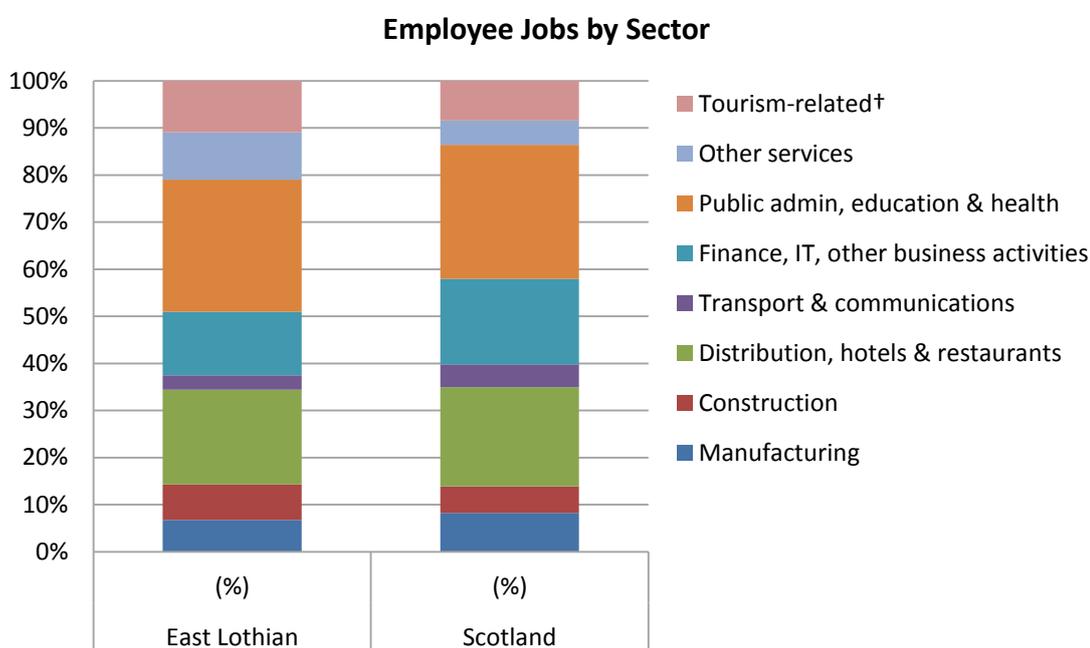
**Figure 24: Jobseekers' Allowance Claimants**

<sup>8</sup> NOMIS official labour market statistics 'Employment and unemployment (Jan 2013-Dec 2013)'

<sup>9</sup> NOMIS official labour market statistics 'Employment and unemployment (Jan 2013-Dec 2013)'

## Employment Sectors

45. The Scottish Annual Business Survey (conducted by the Office for National Statistics) covers approximately two thirds of the economy and provides statistics for most sectors of the economy but excludes parts of the public sector, financial and agricultural sectors. The results of this survey are therefore best suited to analysis of individual sectors rather than the economy as a whole but nevertheless the survey provides some useful information about the performance of sectors of East Lothian's economy over time. The graph below illustrates the distribution of jobs within each sector covered by the survey in East Lothian and Scotland as a whole. The 2008 survey results showed that there are proportionally more tourism related and other services jobs in East Lothian's employment market than across Scotland as a whole, and that finance, IT and other business activities account for a smaller percentage of jobs in East Lothian than they do across the Scottish economy in general.



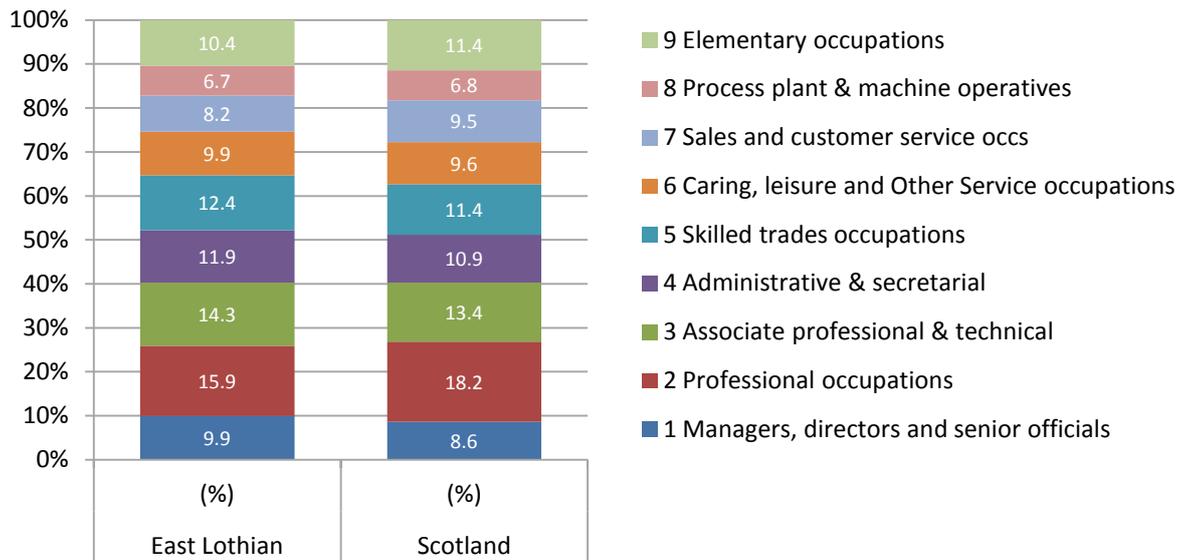
*Source: NOMIS - Annual Business Survey, ONS (2008 data)*

**Figure 25: Employee Jobs by Sector**

46. Annual Business Inquiry/Survey<sup>10</sup> data reveals a number of key changes in East Lothian's economy in recent years. Between 1998 and 2008 it showed that East Lothian experienced growth in the service, construction and tourism sectors, but a decline in manufacturing. More recent Annual Business Survey information shows that between 2008 and 2011 there was a decline in the construction sector in terms of turnover and employee jobs. However it showed an increase in the manufacturing sector in both turnover and employee jobs.

<sup>10</sup> Pre 2008 – Annual Business Inquiry, Post 2008 – Annual Business Survey

### Employees by occupation type



Source: Office for National Statistics

Figure 26: Employees by Occupation Type

47. East Lothian’s labour market has a broadly similar structure to that of Scotland’s overall, with a slightly higher proportion of people employed as managers, directors and senior officials and a slightly lower proportion of people employed in elementary occupations.

### Jobs Density

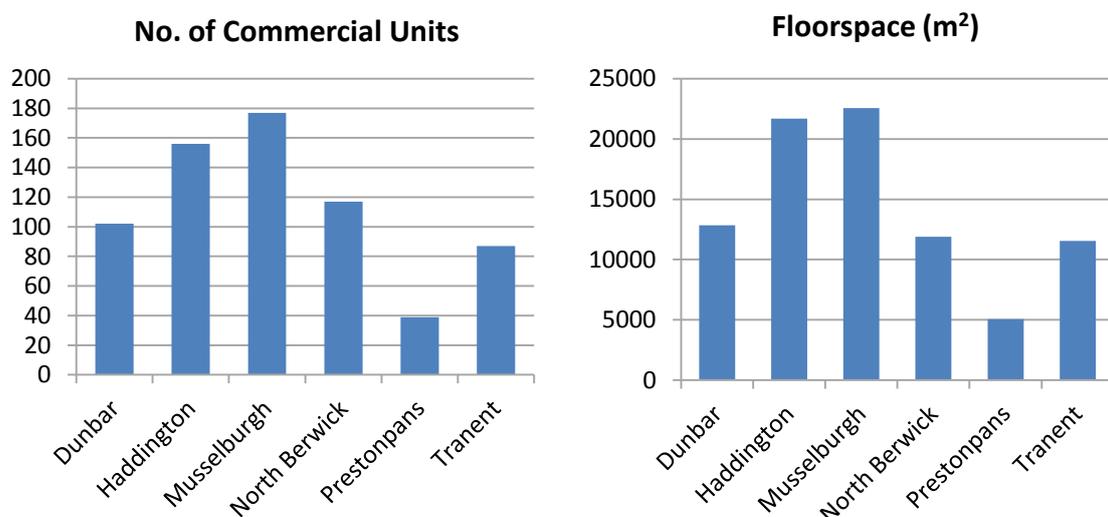
48. Jobs density is a measure of how many jobs there are in a place relative to its working age population. The jobs density in East Lothian is 0.51 jobs per person, compared with 0.76 for Scotland as a whole and 0.78 for Great Britain<sup>11</sup>. This is a significant difference and reflects the high level of out commuting that takes place from East Lothian into Edinburgh. The high levels of out commuting increase pressure on the area’s transport infrastructure, result in more unsustainable travel patterns, and can also make it difficult for those people living in East Lothian to access suitable employment if they do not have access to a car or do not live in an area with good public transport options. A key challenge for the Local Development Plan will be to support the creation of new employment opportunities in East Lothian by ensuring an available supply of sites that are attractive and marketable for employment uses. The LDP will need to promote the co-location of employment areas with housing development, and ensure that they are well integrated with the public transport network, in order to provide more opportunities for people to be able to live and work within East Lothian and reduce out commuting.
49. The Council’s Economic Development Strategy seeks to help create an additional 7,500 jobs in the area by 2022<sup>12</sup>. The strategy aims to increase the number of businesses in East Lothian with growth potential and to increase the proportion of East Lothian residents working in and contributing to East Lothian’s economy. A number of strategic projects are proposed along with a range of other initiatives.

<sup>11</sup> Source: ONS - NOMIS

<sup>12</sup> [East Lothian Economic Development Strategy 2012-2022, University of Glasgow 2012](#)

## Town Centres

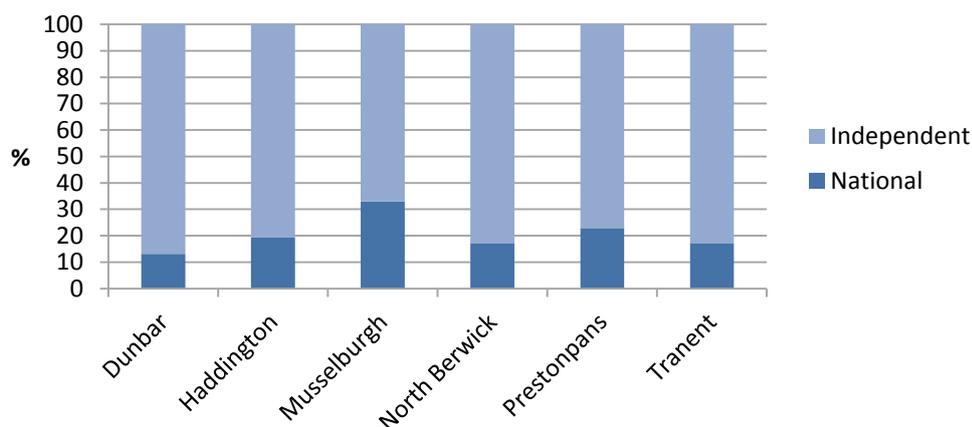
50. There are 6 town centres in East Lothian: Musselburgh, Haddington, North Berwick, Dunbar, Tranent and Prestonpans. Musselburgh, and Haddington are the largest centres in terms of the number of units and floor space they support, and Prestonpans has the fewest number of units and floorspace.
51. East Lothian experiences significant expenditure leakage to other centres in the region, particularly Fort Kinnaird, Straiton Retail Park and Edinburgh city centre. This generates travel demand and long travel distances, and results in a loss of expenditure that might otherwise be available to shops in East Lothian.



Source: ELC Retail Survey 2012

Figure 27: Retail Units and Floorspace

## Proportion of Independent and National Multiple Retailers in Town Centres



Source: ELC Retail Survey 2012

Figure 28: Independent and Multiple Retailers

52. The average vacancy rate for town centre units in East Lothian is currently<sup>13</sup> 5% which compares favourably with the overall rate for Scotland of 9% (British Retail Consortium, April 2012). Town centre vacancy levels in East Lothian increased to 2010 but have fallen since and are now at similar levels to 2006/7.



Source: ELC Retail Survey - conducted late 2012

Figure 29: Town Centre Vacancy Rate Trends

53. Vacancy levels across East Lothian's towns vary significantly with the 2012 retail survey showing North Berwick has the lowest vacancy rate at only 1% (1 unit) or 3% (floorspace), whilst Prestonpans has the highest vacancy rate with 12.5% (5 units) or 26% (floorspace) vacant at the time of the survey. Across East Lothian 5% of units are vacant (5.2% floorspace) which is well below the Scottish average of 14.5%.

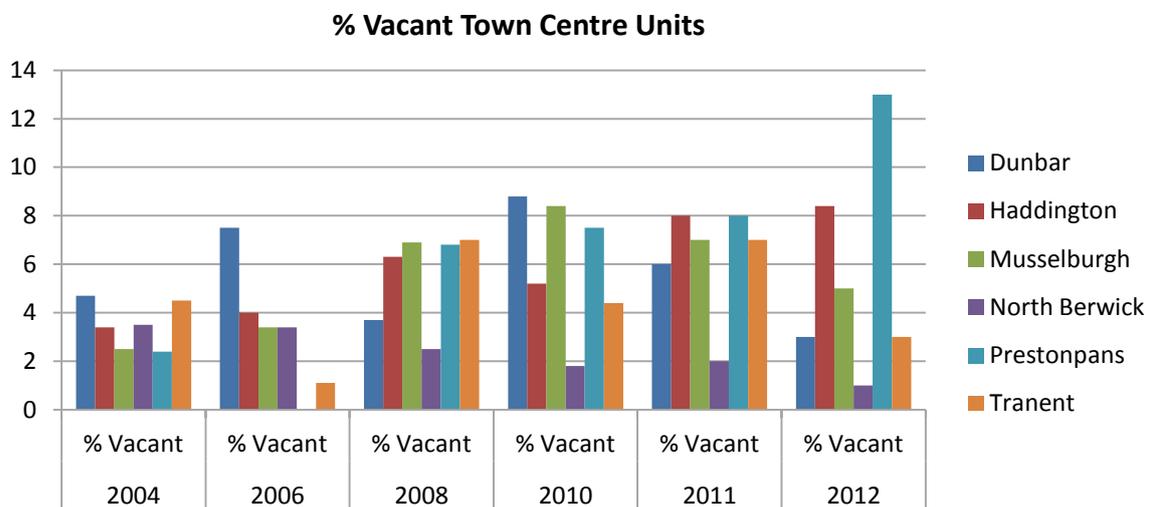
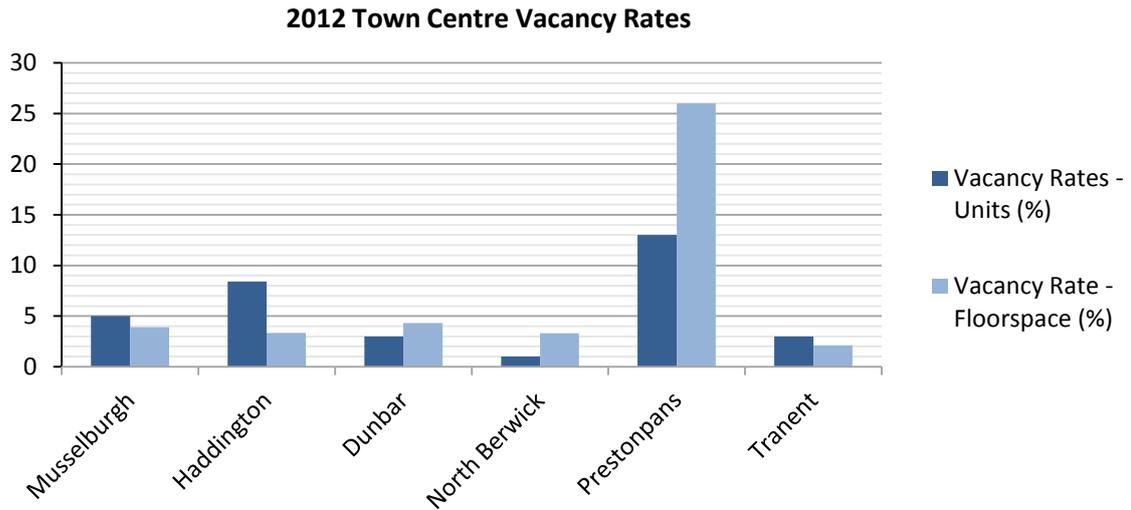


Figure 30: Town Centre Vacancy Rates 2004-2012

<sup>13</sup> 2012 Retail Survey, ELC



*Source: ELC Retail Survey 2012*

**Figure 31: Town Centre Vacancy Rates 2012 (Floorspace and Units)**

#### **Economic Characteristics: Key Issues for the ELLDP**

- Encourage and support economic growth by identifying marketable employment sites, to support an increase in jobs density and GVA.
- Promote employment sites which are accessible by public transport and close to housing areas.
- Support the aims and objectives of the East Lothian Economic Strategy and its ambitious job creation targets.
- Recognise the varying performance of East Lothian's town centres, and support and enhance their vitality and viability with local strategies.

## ENVIRONMENTAL CHARACTERISTICS

### Built and Cultural Heritage

54. East Lothian is an area rich in built and cultural heritage. There are 2,766 properties that are listed buildings, 30 conservation areas, 291 Scheduled Ancient Monuments, 4 historic battlefields, 27 gardens and designed landscapes on the national inventory as well as many others that are of local importance and numerous recorded archaeological sites as well as a wealth of undesignated archaeological remains. Situated between the Scottish Borders and Edinburgh at the foot of the Lammermuir Hills, East Lothian lies on an historic invasion route and there are historic battle sites, castles and other fortifications within the area, which reflect periods of significance in Scotland's political and military history. Four historic battlefields in East Lothian are now included in the national inventory of Historic Battlefields; Pinkie, Prestonpans, Dunbar I and Dunbar II.

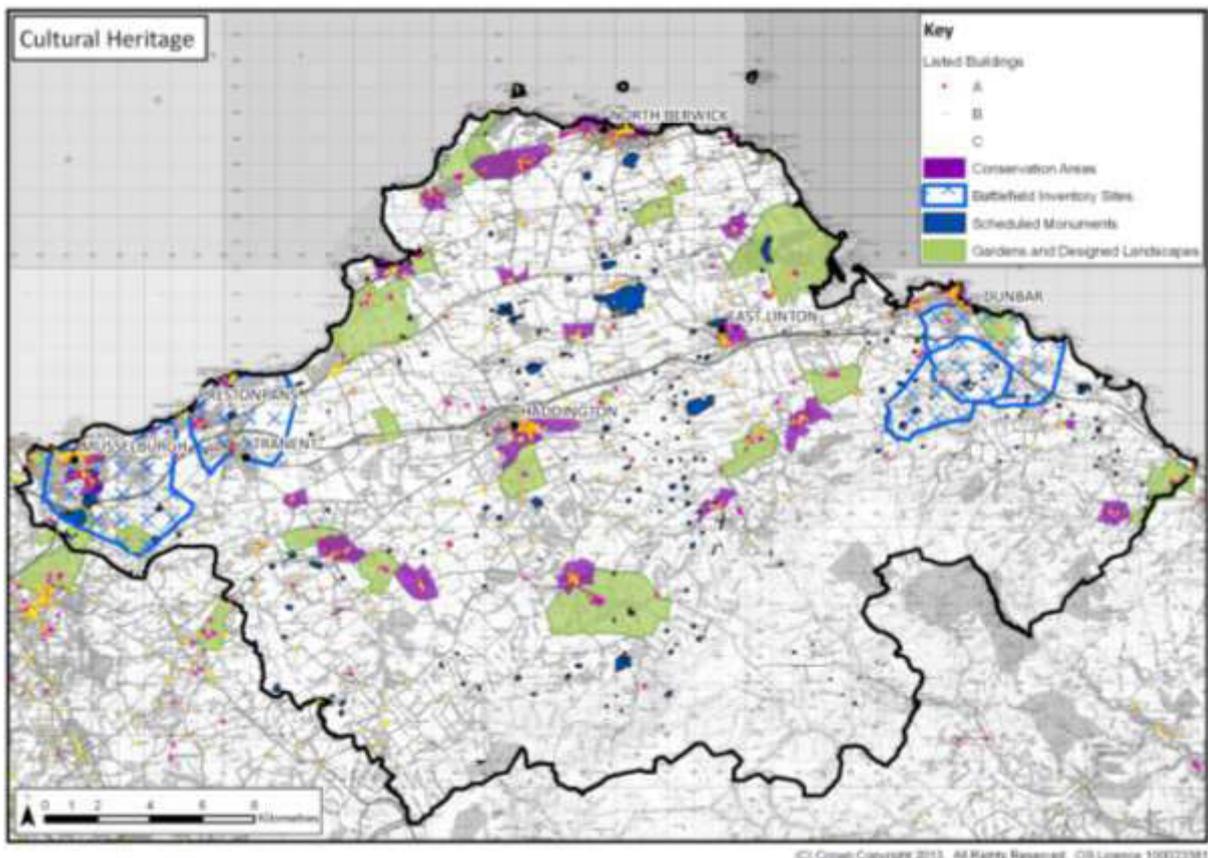


Figure 32: Built and Cultural Heritage Designations

55. Some of East Lothian's built and cultural heritage assets are in a poor state and in need of repair and restoration. There are 88 historic buildings 'at risk' within East Lothian that are identified on the Buildings at Risk Register<sup>14</sup>, with 27 of these classified as being at a high or critical risk and 26 described as being in a very poor or ruinous state. Eight of the buildings are classified as 'restoration in progress'. Many other vernacular buildings in the countryside are also in poor condition. Many gardens and designed landscapes contain features that require repair or restoration. In town centre conservation areas some buildings in multiple ownership are in disrepair due to lack of maintenance to common areas. In Dunbar and Haddington town centres many of these properties were comprehensively repaired through Townscape Heritage Initiative and Conservation Area Regeneration Schemes grant aided programmes to the overall benefit of the

<sup>14</sup> [www.buildingsatrisk.org.uk](http://www.buildingsatrisk.org.uk)

town centre. However others still require repair and with far fewer grants available will be the responsibility of joint owners to adequately maintain.

- 56. The Inventory of Gardens and Designed Landscapes includes those sites that are of national importance. There is an unknown number of non-Inventory gardens and designed landscapes of regional or local importance. These are in the process of being identified by the Garden History Society in Scotland and recorded on the Royal Commission for Ancient and Historic Monuments of Scotland web site, Canmore. To date four gardens and designed landscapes of regional or local importance have been identified in East Lothian: Monkton House at Oldcraighall; Lewisvale Park in Musselburgh, and Amisfield and Clerkington at Haddington.

### Natural Heritage

- 57. East Lothian is an area rich in important habitats and wildlife and plant species. It has a range of sites designated for their international importance for nature conservation and biodiversity. The Firth of Forth is designated as a Ramsar site and also a Special Protection Area due to its importance as a bird habitat. The Forth Islands are also designated as a Special Protection Area.
- 58. Of national significance, Sites of Special Scientific Interest are designated in order to protect sites that are important for plants, animals or geological or physiographical features. There are 15 SSSI's in East Lothian covering the Forth Estuary and Islands, parts of the Lammermuir Hills, quarries and coastal areas where geological features are visible, and areas of woodland and unimproved grassland of significant botanical interest.

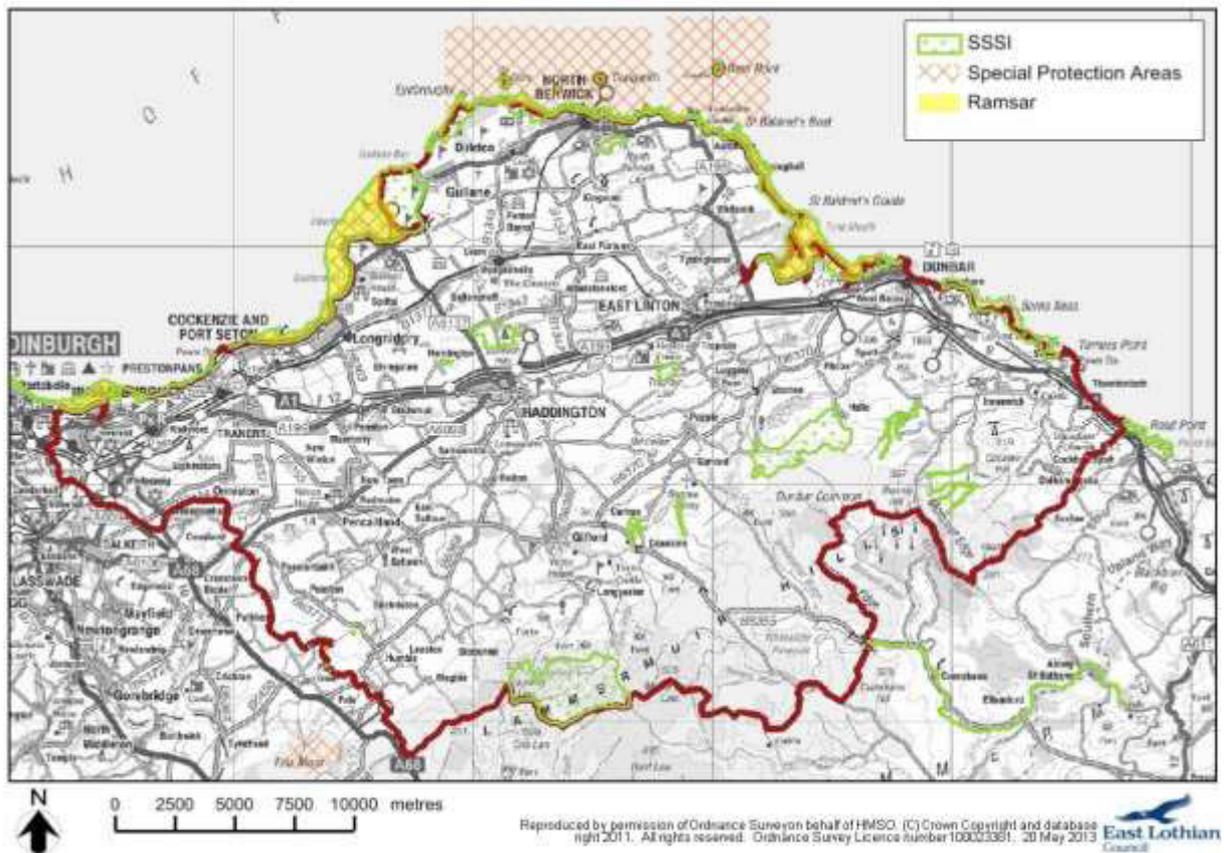


Figure 33: National and International Environmental Designations

Environmental Designation	East Lothian Sites
SPA (Special Protection Area)	Forth Islands Firth of Forth
RAMSAR	Firth of Forth
SSSI (Site of Special Scientific Interest)	Firth of Forth Bangley Quarry Site Barns Ness Coast Site Bass Rock Danskin Loch Forth Islands Garleton Hills Keith Water Site Lammer Law Lammermuir Deans North Berwick Law Papan Water Site Rammer Cleugh Traprain Law Woodhall Dean

59. Scottish Natural Heritage assesses the condition of Special Protection Areas and Sites of Special Scientific Interest by appraising the condition of each of the features within them. The most recent assessments show that 72% of the features in the Special Protection Areas were in a favourable condition when last assessed and 57% of features in SSSIs were in a favourable condition. The Scottish Government has set a target for an increase in the proportion of protected nature sites in favourable condition to 95%.

#### Condition of Features in Special Protection Areas

Favourable Maintained	Favourable Recovered	Favourable Declining	Unfavourable Recovering	Unfavourable Declining	Partially/Totally Destroyed	Total
19	1	11	1	11	0	43
44%	2%	26%	2%	26%	0%	

Source: SNH Sitelink

Figure 34: Condition of Special Protection Areas

#### Condition of Features in Sites of Special Scientific Interest

Favourable Maintained	Favourable Declining	Unfavourable Recovering	Unfavourable No change	Unfavourable Declining	Partially/Totally Destroyed	Unknown	Total
34	7	1	6	23	0	1	72
47%	10%	1%	8%	32%	0%	1%	

Source: SNH Sitelink

Figure 35: Condition of Sites of Special Scientific Interest

Marine Protected Areas have been designated to give similar protection to biodiversity offshore. The closest of these to East Lothian is the Firth of Forth Banks Complex, which is outwith Scottish Territorial Waters, generally to the east of the area.

### Local Designations

60. In addition to the international and national protected sites there are a large number of local sites of importance for nature conservation and biodiversity. Aberlady Bay was the first Local Nature Reserve to be designated in Scotland, in 1952. It covers an area of 575 hectares, about 2/3 of which is below the high tide mark, consisting of tidal sand, salt marsh and mud flats. It is within the Firth of Forth SSSI, and is managed to improve the area for wildfowl, waders and the wide variety of plants..
61. The Scottish Government produced guidance in 2006 on the designation of wildlife areas that were of local or regional importance. Following this guidance, East Lothian Council established an expert group to oversee the designation of such Local Biodiversity Sites. The new designation was based on past ecological surveys and analysis by the Scottish Wildlife Trust to identify the best areas of the county for wildlife. These areas were mapped and linked with each other using areas of adjacent semi-natural habitat. The intention was to create a network of land and river that was zoned for wildlife. As a network, one of its functions is to allow the movement of wild species across the county. Opportunities will be sought to develop effective management for these sites to enhance and sustain their wildlife value. The policies of ELLDP will protect these areas from inappropriate development.
62. Local sites which are important for biodiversity were identified previously by the Scottish Wildlife Trust. These sites could have a biodiversity value equal to that found in SSSI's, which were chosen to be representative, and to be sufficient to conserve nationally or international biodiversity, rather than to protect all important biodiversity interests. These Wildlife Sites, of which there were 56, were recognised and mapped in the Local Plan 2008.
63. A geodiversity audit is being carried out at present, and this is intended to lead into designation of Local Geodiversity Sites. Policy protection for these sites would be included in an amalgamated policy on sites designated for their natural heritage interest, and these sites would be included on the proposals map.
64. The East Lothian Biodiversity Action Plan<sup>15</sup> sets out a vision for the conservation of biodiversity in the area. It identifies priority habitats which are important in achieving this. The Priority Habitats are based on a Phase 1 survey carried out in 1997, which is the most up to date data available (see Figure 36 below)

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<sup>15</sup> East Lothian [Biodiversity](#) Action Plan 2008-2013

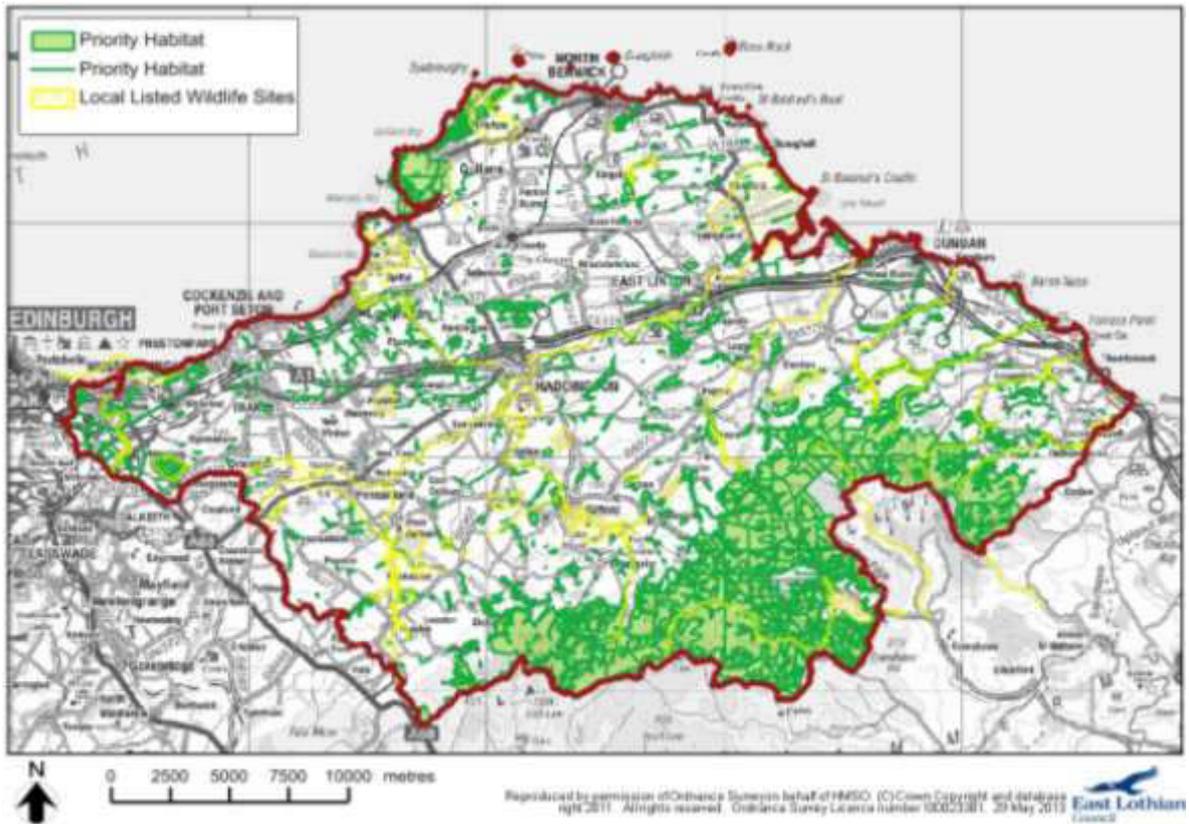


Figure 36: Priority Habitats

65. East Lothian has less woodland than the Scottish average. The area of native woodland in East Lothian is 1,405ha, which is 20.3% of the total woodland area or 2.1% of the total land area of East Lothian<sup>16</sup>. There are 895ha of woodland now present on ancient woodland sites, of which 34% is native. Another 8% is nearly-native in composition (i.e. 40-50% native species in canopy).

<sup>16</sup> Forestry Commission Scotland Native Woodland Survey of Scotland

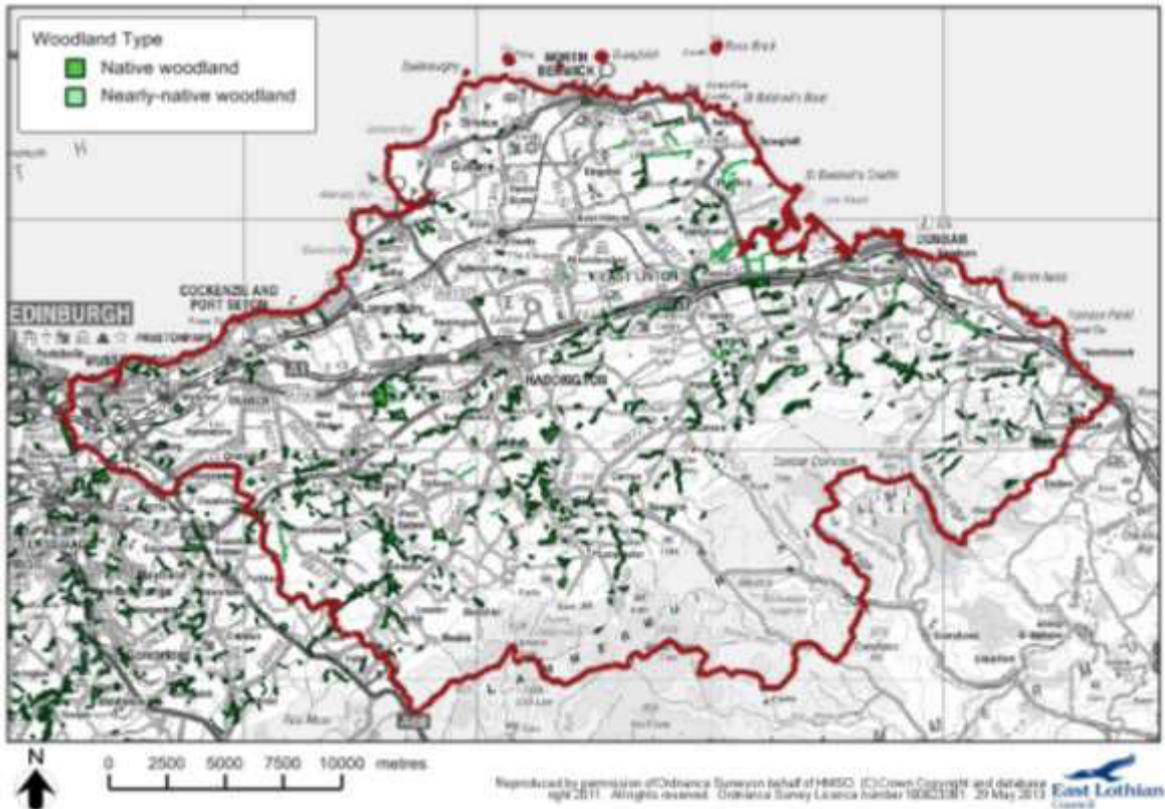


Figure 37: Native and nearly native woodland

## Soil

66. Maintaining soil quality and function is important for a wide variety of reasons, including food production, climatic factors, biodiversity, and controlling the quality and quantity of water flow. Much of East Lothian’s agricultural land is classified as prime quality by the Macaulay Institute for Soil Research (Class 1 – 3.1); this being land which is capable of producing a very wide to moderate range of crops. East Lothian contains a significant proportion of the Scottish resource (see Figure 38). Prime quality agricultural land is found mostly to the north of East Lothian, on the raised beach of the Firth of Forth, now the agricultural plain, and along the coastal strip. This is with the exception of some patches of rough grassland associated with dune habitats around Aberlady and Gullane Bays.

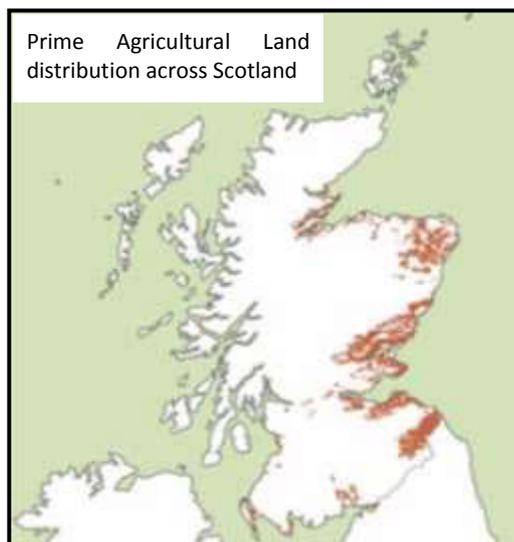


Figure 38: Prime Agricultural Land Resources across Scotland

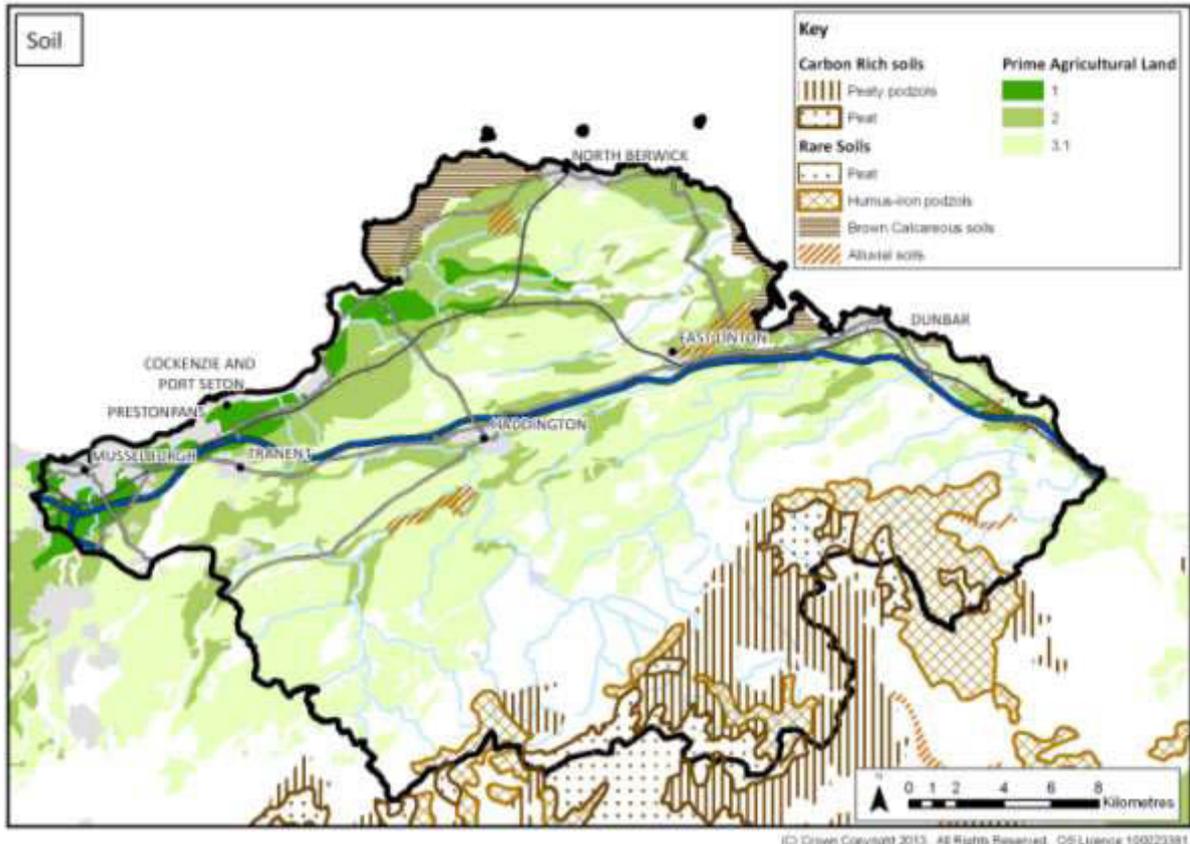


Figure 39: Soil Types in East Lothian

67. The majority of prime quality agricultural land is found around those areas where settlement has already occurred, and where pressure for further development is likely to be greatest in future. It is important to protect prime quality agricultural land as much as possible since development is likely to irreversibly affect this resource.. Whilst East Lothian benefits from extensive areas of prime quality soils particularly towards the coast to the north and west, in the east the foothills of the Lammermuir hills with their poorer quality soils encroach on the coastal plain. Soils in the Lammermuirs are mostly suitable only for improved grassland and / or rough grazing while those in the foothills of the Lammermuirs tend to be capable of producing a narrow range of crops.
68. Soil also functions as a carbon store, with some soils such as peat being particularly high in organic matter. East Lothian does contain areas of peat soils predominantly in the Lammermuir Hills. Development has the potential to result in the disturbance of carbon rich soils which can lead to the loss of soil function, integrity and stability, resulting in erosion, degradation and a reduction in this finite resource. It is also likely to lead to the release of stored carbon, contributing to greenhouse gas emissions and to pollution / siltation of watercourses with potential significant adverse effects on their ecological status, yet there are gaps in knowledge on the effect of land use change on soils.

## Minerals

69. East Lothian has a variety of minerals of varying quality, reflecting its geological history. Their extraction is important to support development, and although recycled materials are available for some uses, such as aggregate for roads, extraction remains the only possible source for other uses.

East Lothian has deposits including sand and gravel deposits as well as building stone, rock aggregates (hardrock), limestone and coal.

- 70. Limestone for cement manufacture is extracted at Oxwellmains. Longyester is a sand and gravel quarry, with reserves there estimated to be sufficient for one year, although planning permission has been approved for an extension to these workings. In addition further sand and gravel works have been given permission at Skateraw. Markle Mains hard rock quarry is active and has a reserve of around 14 years. Although Bangley hard rock quarry is currently inactive, it has a reserve of around 14 years remaining.
- 71. There are currently no operational coal mines of any kind in the area. In recent times surface coal was worked at Blindwells, and there have been both deep and shallow mining historically across much of the East Lothian coalfield. The remaining areas underlain by coal are close to existing relatively tight settlement groups with attractive landscape settings.

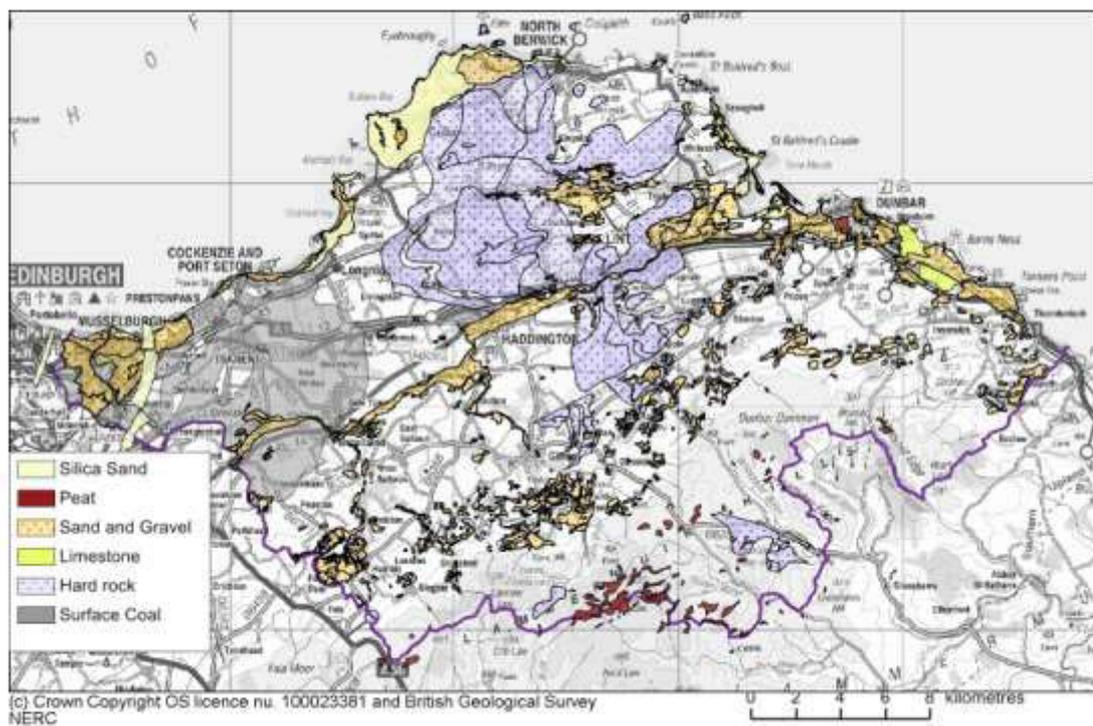


Figure 40: Potential mineral resources

## Water

- 72. Two major rivers, the Tyne and the Esk, pass through East Lothian to discharge into the Firth of Forth. These rivers have several tributaries and watercourses which form a natural drainage network within East Lothian. In addition, several watercourses flow directly to the Firth of Forth without entering a river system. In the Monynut/Mayshiel area of the Lammermuirs there are watercourses which flow south to join the River Tweed with most of the flow accumulating in the Whiteadder Reservoir before passing into the River Tweed Special Area of Conservation.

### Water Bodies

73. SEPA annually classifies the condition of 53 'baseline' water bodies<sup>17</sup> within or partially within East Lothian. The majority of these are rivers, but there are also several transitional, coastal and ground water bodies and a single loch. Of these most are natural water bodies but three are classified as heavily modified water bodies. There are a number of other 'non-baseline' water bodies in East Lothian that are not currently classified by SEPA.
74. SEPA reported in 2009<sup>18</sup> that only 18 (34%) of water bodies within or partially within East Lothian were at good status. The remaining 35 (66%) were classified as being at moderate, poor or bad ecological status. Water bodies at good status are generally situated in the south eastern areas of East Lothian, whilst those of moderate, poor or bad quality are in northern, central and western parts. A summary of the classification of surface waters and ground water within or partially within East Lothian is shown in table below and maps overleaf.

2008 Status	Number of Water Bodies					
	All Water Bodies	Rivers	Lochs	Estuaries	Coastal Waters	Groundwater <sup>19</sup>
High/Maximum	0	0	0	0	0	0
Good	18	6	0	1	4	7
Moderate	7	6	0	0	1	0
Poor	22	19	0	0	0	3
Bad	6	5	1	0	0	0
<b>Totals</b>	<b>53</b>	<b>36</b>	<b>1</b>	<b>1</b>	<b>5</b>	<b>10</b>
<b>Number good or better</b>	<b>18</b>	<b>6</b>	<b>0</b>	<b>1</b>	<b>4</b>	<b>7</b>
<b>Proportion good or better</b>	<b>34%</b>	<b>17%</b>	<b>0%</b>	<b>100%</b>	<b>80%</b>	<b>70%</b>

Source: Scottish Environment Protection Agency (SEPA)

Figure 41: Status of Water Bodies

<sup>17</sup> Baseline water bodies are those classified under the Water Framework Directive. These are water bodies over the following size threshold – rivers with a catchment area of more than 10km<sup>2</sup> and lochs which have a surface area greater than 0.5km<sup>2</sup>, and all estuaries and coastal water bodies regardless of size.

<sup>18</sup> End of 2008 SEPA classification, reported to Europe in 2009

<sup>19</sup> Bodies of groundwater are classed as either good status or poor status.

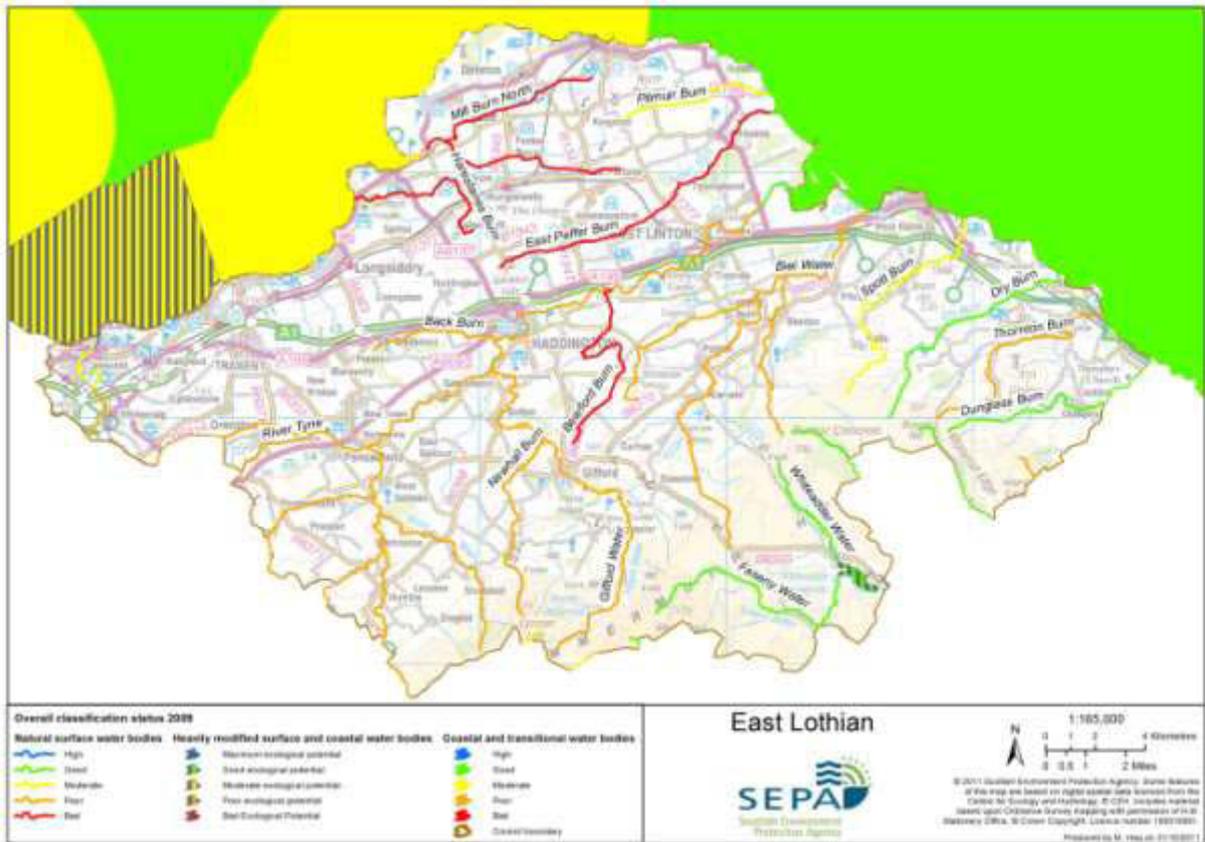


Figure 42: Status of Water Bodies

*Bathing Waters*

75. East Lothian has 12 designated bathing waters<sup>20</sup> that are monitored by SEPA. Designated bathing waters are listed in the table below along with results reported in the SEPA Scottish Bathing Waters 2010 report. In 2010 it was reported that eight of East Lothian’s bathing waters were guideline quality and four were of mandatory quality; importantly, none were classed as failing.

Bathing Water	2010 Result <sup>21</sup>
Seton Sands	Guideline
Longniddry	Guideline
Gullane	Guideline
Yellowcraigs	Mandatory
Broadsands	Guideline
North Berwick (West)	Mandatory
North Berwick (Milsey Bay)	Mandatory
Seacliff	Guideline
Dunbar (Belhaven)	Guideline
Dunbar East	Mandatory
Whitesands	Guideline
Throntonloch	Guideline

Figure 43: Bathing Water Quality

<sup>20</sup>Water Framework Directive definition of bathing water - where a large number of people are expected to bathe and a permanent bathing prohibition, or permanent advice against bathing, has not been issued.

<sup>21</sup> Mandatory: indicates a pass of the current directive’s mandatory standards; Guideline: indicates a pass of the current directive’s more stringent guideline standards.

76. The water environment in East Lothian is under significant pressure and the key pressures that have resulted in many water bodies being classified as a moderate, poor or bad status are diffuse pollution and over-abstraction, both as a result of arable farming. Point source pollution, flow regulation and physical changes also exert pressure on the water environment in East Lothian.
77. A key challenge is to restore water bodies to good ecological status. In East Lothian the Forth Area Management Plan aims to improve the water bodies so that by 2015 42% are at good or high ecological status; 58% by 2021 and 100% by 2027. This will contribute to the overall goal of the Scotland river basin district, which is for 97% of water bodies to be in good or better condition by 2027.
78. The Forth Area Management Plan establishes a programme of measures to protect water bodies from deterioration and restore water bodies that are below good ecological status. Measures include regulatory tools, the latest investment planning work for Scottish Water, partnership working with landowners to reduce pollution and to tackle pressures from physical changes, awareness raising and guidance provision. Land use planning can only contribute to achieving a limited number of those measures, for example ensuring efficient Sustainable Urban Drainage Systems (SUDs) in new development.

## Flooding

79. Several towns and communities in East Lothian have a history of, and continue to be at risk from, flooding. Flooding comes in three main forms: river, surface water, and coastal. River and surface water flooding are caused by heavy rain or snow fall, or snow melt, while coastal flooding is caused by extreme tides, storm induced waves or sea surges, sometimes in combination with each other. Localised flooding around watercourses can also be caused by blockages such as a build up of debris, fallen trees, or the deliberate dumping of material.
80. Recognised river flood risk exists in Haddington, Musselburgh and West Barns, from the Tyne, Esk and Biel Burn respectively. River flooding has been a longstanding problem at the Tyne in Haddington, with floods in 1931, 1948, 1956 and 1984 causing considerable damage to land and properties, with property in East Linton also suffering damage. Thin soil levels and a lack of woodland cover in the Lammermuir hills are likely to increase the rate of run-off in the catchment area, increasing the risk of the river flooding. The Biel is also prone to flooding, and the Council has installed stone gabions to reduce the risk of flooding at West Barns. Musselburgh has also suffered flooding from the Esk, affecting low-lying properties near the river. Property alongside water courses elsewhere is also liable to flooding during periods of high rainfall and property at Pencaitland and Ormiston have also suffered flood damage in the past.
81. Coastal flooding has also been a problem. The towns of Musselburgh, Prestonpans, Cockenzie/Port Seton, North Berwick and Dunbar are located on the coast. There were severe winter storms in 2010 and 2012, causing the flooding of harbours and beyond, with a storm in 2012 causing £90,000 of damage to North Berwick Harbour as sea defences were overtopped and harbour infrastructure damaged. This problem could get worse in the future, as winds from the north east have become



more common, helping increase the size and power of waves as they arrive onshore. Sea level rise also increases the probability of flooding on the coast.

82. A key cause of flooding in East Lothian is from surface water runoff from agricultural land. Heavy and intense rainfall during storms can lead to a high degree of surface water runoff especially when the ground is already saturate, endangering communities and infrastructure. A storm in June 2012 caused extensive problems with the North Berwick railway branch line being closed, as well as a number of roads. Surface water affected Musselburgh, Tranent, Macmerry, Prestonpans and the A1, causing severe disruption to traffic.
83. High ground water levels have caused flooding to property basements in east Musselburgh.
84. Flood Studies have been carried out for both Haddington and Musselburgh. These studies involved modelling and provided recommendations for further work.
85. Over a large number of years, development has occurred on the floodplain and in coastal areas (sometimes unavoidably, for example harbours). This has increased the risk of losses caused by flooding.
86. Potentially Vulnerable Areas (PVAs) have been identified by SEPA as areas where the potential impact from flooding is sufficient to justify further assessment and appraisal of Flood Risk Management actions. It is important to note, not all properties within a PVA are at risk of flooding. This shows the areas where flooding is a strategic issue, and aims to help focus work on flood prevention. This information is not appropriate for assessing whether an individual site or property is liable to flooding.
87. East Lothian Council will produce a Local Flood Risk Management Plan, to be published in June 2016, following on from SEPA's Strategic Flood Risk Management Plan, due to be published in January 2015. This will contain details on specific schemes which are proposed to alleviate flooding, and the ELLDP should refer to this document.
88. The Local Plan aims to avoid increasing unmanageable flood risk, either to a proposed development or caused by it. SESPLAN requires that the ELLDP must identify areas of flood risk as well as flood schemes that reduce the risk of flooding. It must avoid development in medium to high flood risk areas and safeguard areas that will reduce flood risk. The area that is covered by the medium to high flood risk is the natural flood plain, and avoidance of building on this would help reduce risks from flooding there and elsewhere. Provision should be made to prevent deterioration of the water environment resulting from new development, as well as promoting the enhancement of the water environment where possible. The SDP's policy approach to this matter is clear and there is no scope for any alternative. SEPA has recently published new flood maps to assist with the interpretation of this policy and the policy should refer to the latest SEPA flood maps.
89. Policy INF5 Haddington Flood Plain of the Local Plan aims to avoid damage by flooding by avoiding greenfield development within the floodplain unless it consists of infrastructure that cannot be located elsewhere. Brownfield re-development is only permitted where it is on a site protected by existing flood measures, and will not increase the risk of on- or off-site flooding. This policy remains relevant but is there is a need to extend the policy to include other potential flood risk areas in East Lothian such as Musselburgh, West Barns, and Gifford. Additional flood defences will be required in Musselburgh, Haddington and West Barns.

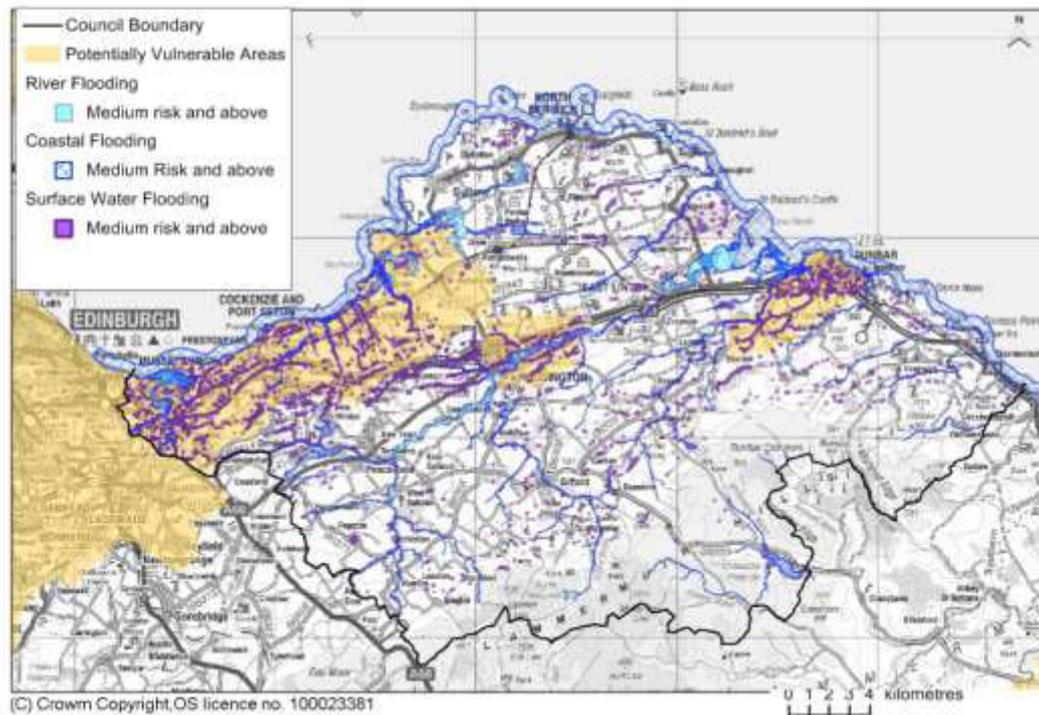


Figure 44: Flood Risk

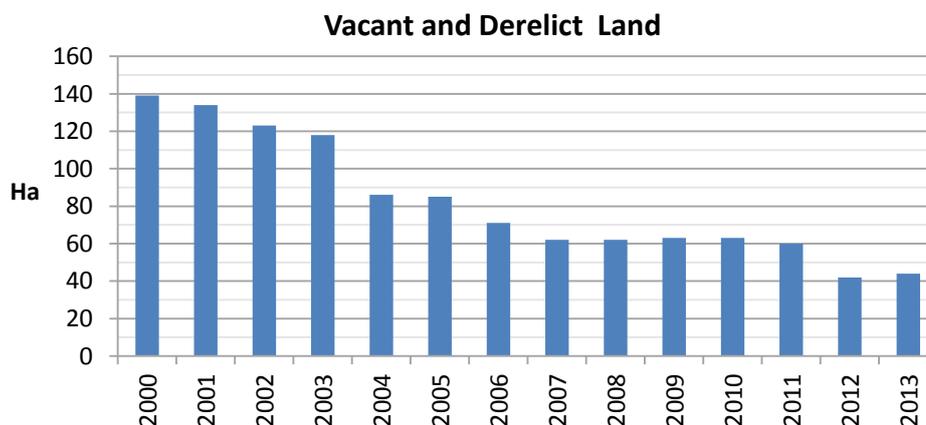
## Air Quality

90. As required by Part IV of the Environment Act 1995, the Council annually reviews and assesses local air quality. The air quality objectives for Scotland are set out in the Air Quality (Scotland) Regulations 2000 and its 2002 Amendment. The majority of pollutants (benzene, 1, 3-butadiene, carbon monoxide, sulphur dioxide and lead) have been screened out in previous assessments for East Lothian. Exceedences of air quality objectives for these pollutants across East Lothian are unlikely.
91. The pollutants of greater concern in an East Lothian context are particulate matter [(PM10) and nitrogen dioxide (NO<sub>2</sub>)], principally from road traffic sources. For both of these pollutants air quality objectives are unlikely to be exceeded across most of East Lothian. PM10 levels are not considered likely to breach air quality objectives at this time although monitoring continues in Musselburgh. Ongoing automatic monitoring of PM10 confirms that both the annual and 24-hour mean objectives continue to be met in Musselburgh town centre.
92. The main issue for East Lothian relates to nitrogen dioxide. Monitoring of NO<sub>2</sub> concentrations in Musselburgh, using monitoring data from 2011 and computer modelling, predicted that the highest annual average NO<sub>2</sub> concentrations were at receptors on High Street and Bridge Street close to bus stops. It was predicted that the majority of these annual mean exceedences were marginal.
93. Additional monitoring of NO<sub>2</sub> levels in 2012-13 confirmed that parts of the High Street are just exceeding the nitrogen dioxide Annual Mean Objective which is a measure of possible longer term exposure. The one-hour Mean Objective, a measure of short term exposure, is unlikely to be breached.

- 94. Monitoring of NO<sub>2</sub> in other parts of Musselburgh (including Bridge Street) and in Tranent does not indicate any exceedence of air quality objectives. Monitoring of NO<sub>2</sub> levels will, however, continue.
- 95. East Lothian Council has declared an Air Quality Management Area (AQMA) in Musselburgh in relation to breaches and likely breaches of the nitrogen dioxide annual mean air quality objective. The area contains the High Street from the junction with Newbigging to the junction at Bridge Street. An Air Quality Action Plan will be prepared to guide improvement in local air quality and future compliance with air quality objectives.

## Vacant and Derelict Land

- 96. The amount of vacant and derelict land in East Lothian has decreased by 68% between 2000 and 2013. Of the 44ha of vacant and derelict land in 2011, 38ha was classed as derelict and 6ha as vacant land/vacant land and buildings. The vacant and derelict sites are in a range of urban and rural locations with sites including old mills, industrial buildings, and a range of small urban vacant sites. The vast majority of the vacant and derelict sites are less than 2 hectares, with about half being under a hectare. There are very few larger sites, with the largest being the East Fortune hospital site measuring approximately 14ha, which is in a countryside location adjacent to the former airfield. A recent example of a vacant site being redeveloped and brought back into use is Brunton Wire Works site in Musselburgh which has been redeveloped for a supermarket, health centre and sheltered housing scheme.



97.

Source: Annual Vacant and Derelict Land Surveys

Figure 45: Vacant and Derelict Land

- 98. The relatively small amount that remains however highlights the lack of brownfield redevelopment opportunities in East Lothian and the consequent reliance on greenfield land for housing development, much of which is prime quality agricultural land.

## Climatic Factors

- 99. The Department for Energy and Climate provides estimates per capita emissions of carbon dioxide (CO<sub>2</sub>) at a local authority level. This data does not include emissions from motorways, diesel railways, land use change and forestry and EU Emissions Trading System (ETS) industrial allocations. Formerly known as the NI 186 indicator the data presented in the table below is now referred to as 'Carbon dioxide emissions within the scope of influence of Local Authorities'.

Year	Industry and Commercial	Domestic	Road Transport	Total	Per Capita Emissions (t)	Per Capita: Scotland
2005	222.6	252.0	220.7	695.3	7.6	7.9
2006	230.3	253.9	219.8	703.9	7.6	7.9
2007	231.0	250.2	226.0	707.1	7.5	7.8
2008	248.6	250.3	213.5	712.4	7.4	7.6
2009	200.3	225.8	203.0	629.1	6.5	6.8
2010	233.5	250.0	199.7	683.2	6.9	7.2
2011	203.2	219.6	196.0	618.7	6.2	6.5
2012	226.3	244.1	190.6	661.0	6.6	6.8

Source: 'Emissions within the scope of Local Authorities for 2005-2009', DECC

Figure 46: East Lothian Carbon Dioxide Emissions

100. The above table shows a reduction in per capita CO<sub>2</sub> emissions in East Lothian of around 13% from 2005 to 2012 and indicates that per capita emissions in East Lothian are generally slightly below the Scottish average. As stated this data excludes major uses such as the Lafarge cement works in Dunbar which is a major source of CO<sub>2</sub> emissions at a national level. Figure 46 illustrates that road transport accounts for almost a third of the total carbon dioxide emissions in East Lothian. The high levels of out commuting by car from the area, and the relatively poor accessibility of large parts of East Lothian by public transport present a significant challenge in reducing carbon dioxide emissions from road transport. The western part of East Lothian is much more accessible by public transport than the east and offers much better opportunities for travel by more sustainable transport modes such as buses and trains, particularly given that it is served by the Lothian Bus network. Interestingly, while road transport emissions have fallen in both absolute and per capita terms, East Lothian's road transport emissions have fallen more in per capita terms than the average for Scotland. Domestic per capita emissions are in line with the Scottish average, while Industrial and Commercial emissions are somewhat below.

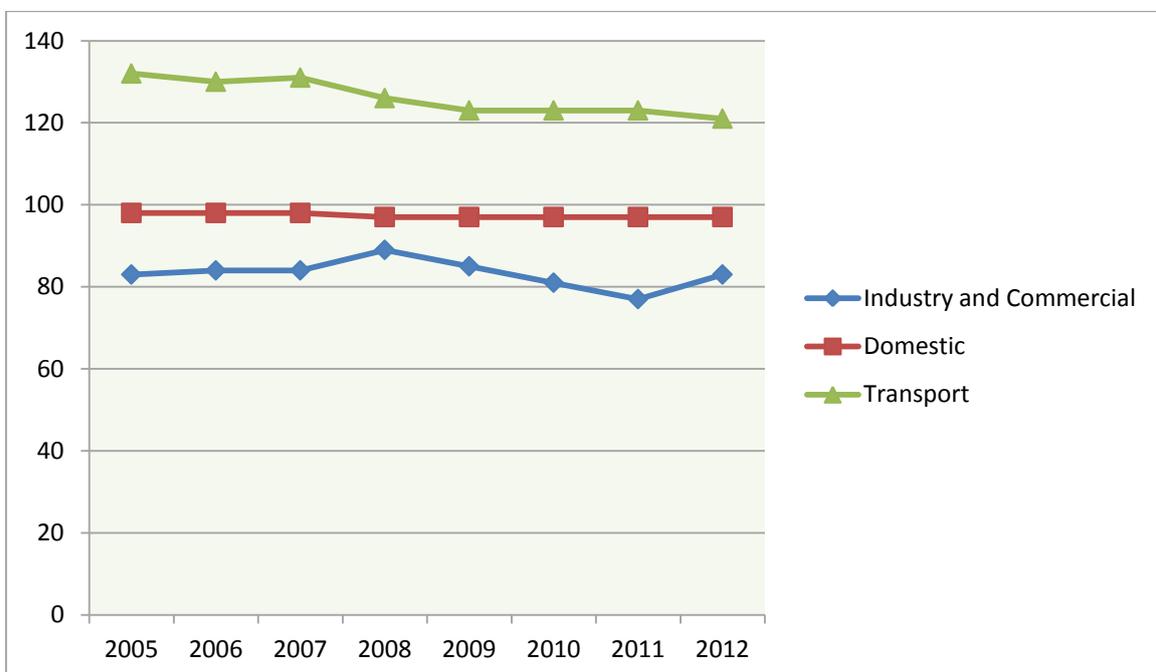


Figure 47: East Lothian per capita CO<sub>2</sub> emissions as a percentage of Scottish CO<sub>2</sub> per capita emissions<sup>22</sup>.

<sup>22</sup> Further information on the methodology behind the emission data can be obtained from DECC at [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/322831/20140624\\_Methodology\\_summary\\_Local\\_Authority\\_CO2\\_emissions.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322831/20140624_Methodology_summary_Local_Authority_CO2_emissions.pdf)

101. Directing new development to locations within East Lothian that minimise the need to travel and enable travel by more sustainable modes of transport needs to be an integral part of the Local Development Plan strategy if progress is to be made in reducing emissions.

## Open Space

102. An audit of Open Space was carried out in 2009. An analysis of this data assessed the quantity, quality and accessibility of East Lothian’s open spaces. Based on an assessment by cluster area the analysis concluded that larger urban areas to the west of the region (Musselburgh, Prestonpans and Tranent) have more poor quality open spaces, compared to the eastern settlements of Dunbar, North Berwick and Haddington. Overall, however, East Lothian enjoys a good supply of high quality parks and open spaces.

**Meeting Quantity, Quality and Accessibility Standards for Open Space**

Cluster	Green Networks	Parks and Gardens			Amenity Greenspace	Playspace	Sports Areas
	Accessibility	Quantity	Quality	Accessibility	Quality	Accessibility	Accessibility
Musselburgh	Yes	Yes	No	Yes	No	Yes	Yes
Prestonpans	Yes	Yes	No	Yes	Yes	No	Yes
Tranent	No	No	No	No	Yes	Yes	Yes
North Berwick	Yes	Yes	Yes	No	Yes	No	No
Haddington	Yes	Yes	Yes	No	Yes	Yes	Yes
Dunbar	Yes	No	Yes	No	Yes	No	Yes

*Source: ELC Draft Open Space Strategy*

**Figure 48: Quantity, Quality and Accessibility of Open Space**

103. As a result of this analysis some deficiencies in open space provision have been identified. New development may also increase pressure on existing open space, leading to a deficiency. Open Space standards, including contributions to off-site provision, will be reviewed. This will include the types of new development this applies to, the number of houses/units that will trigger the requirement and how developer contributions would be spent. It will also include financial arrangements for developer contributions for provision of off-site open space where the size of the development falls below the threshold or there is adequate existing provision to accommodate residents in the new development and require large scale strategic housing land releases to contribute to opportunities for open space and Green Network enhancement.

## Landscape

104. East Lothian is situated between the Scottish Borders and Edinburgh. It is an area of varied and attractive landscape character, comprising countryside and coast, with river valleys dissecting the agricultural coastal plain, all framed by the backdrop of the Lammermuir Hills. Land cover also varies with raised beaches and dunelands giving way to arable farmland, much of it prime quality, then to rough grassland in the upland fringes and heather moorland and peatland in the upland areas. Woodland cover features in the upland fringes and lower lying areas, including shelter belts, policy plantations and along river valleys, but is generally absent along the Lammermuir ridge line.
105. East Lothian’s landscape is interspersed with historic towns and villages as well as prominent physical features such as watercourses, the Garleton Hills, North Berwick and Traprain Laws, designed landscapes and other historical sites, buildings, landmarks and monuments. The A1(T)

Trunk Road and the East Coast Main Line pass through the area from west to east. To the west around 40% of the population live in the relatively tight grouping of expanding settlements positioned between the coast and the hills around the main transport corridors and the coast. To the east the settlement pattern is generally more dispersed as the agricultural plain widens.

106. The agricultural landscape is one of large generally flat fields that provide attractive distant views across the countryside and coastal plain and its landmarks north to the Firth of Forth and beyond and south to the Lammermuirs. Appropriate treatment of settlement boundaries including where development has been allowed has so far maintained the character and separate identity of each settlement together with their landscape settings. Yet the need for new development will continue to pressurise these characteristics. The Edinburgh Green Belt has an important role in managing and maintaining this to the west of East Lothian, although some areas of land within the Green Belt have been identified through a landscape character assessment study<sup>23</sup> as making a lesser contribution to overall Green Belt objectives than others.

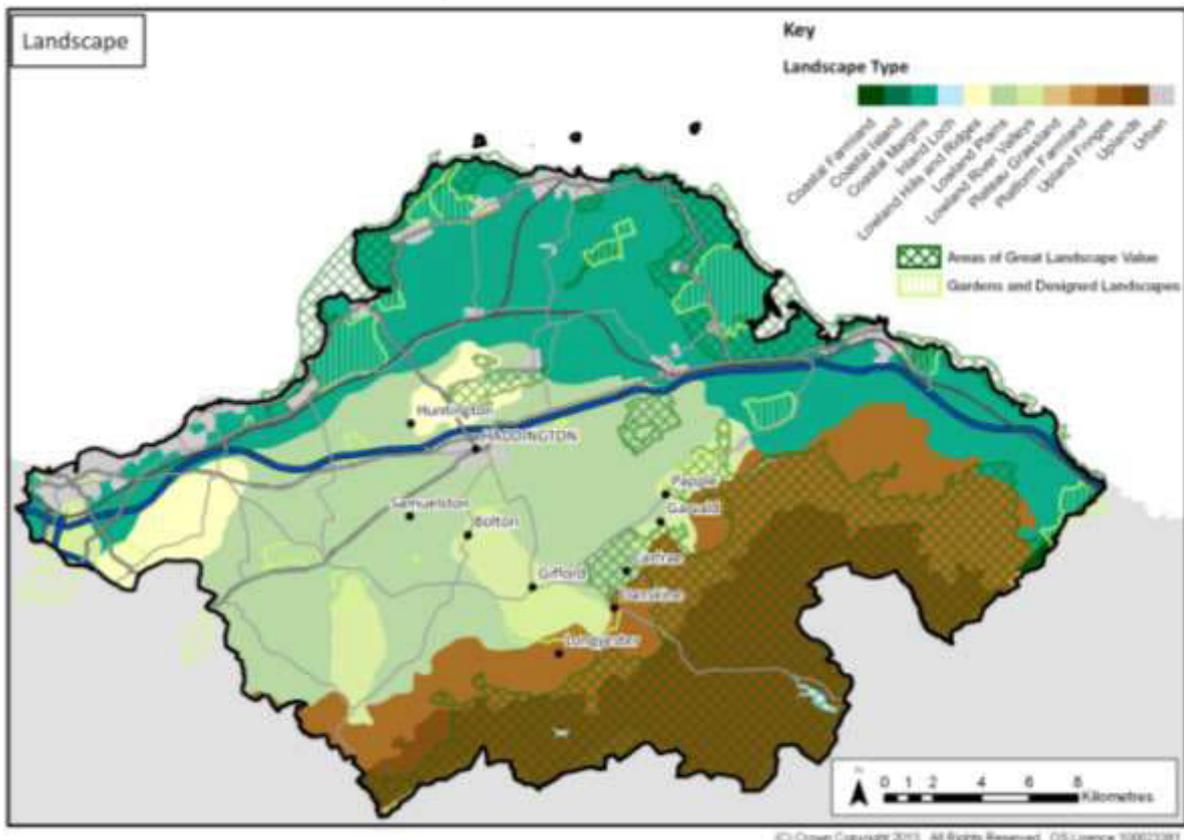


Figure 49: Landscape Character Areas in East Lothian

107. There are 10 designated Areas of Great Landscape Value in East Lothian, These include most of the Lammermuir Hills, volcanic outcrops at the Garleton Hills, Traprain and North Berwick Law, the majority of the coastline, some river valleys, and areas of deciduous and coniferous woodland.
108. There are 27 designed landscapes which are on Historic Scotland’s national Inventory of Gardens and Designed Landscapes within or partly within East Lothian. There are other local designed landscapes which are in the process of being recorded (see paragraph 56).

<sup>23</sup> Edinburgh Green Belt: Landscape Character Assessment, prepared by Land Use Consultants in association with Carol Anderson, December 2008.

## Environmental Characteristics: Key Issues for ELLDP

- Conserve biodiversity whilst accommodating the required levels of new development in East Lothian
- Support a development strategy that promotes further reductions of carbon dioxide emissions, in part through directing new development towards the most sustainable locations
- Provide appropriate amounts and quality of open space in new development
- Promote development of the Central Scotland Green Network
- Protect and enhancing East Lothian's historic and cultural assets
- Promoting the development of brownfield land in preference to greenfield land, but recognising the limited brownfield development opportunities
- Ensure the spatial strategy does not undermine the overall qualities of East Lothian's landscape, and ensure that policies are in place to allow development to be managed so that it respects local landscape character
- Minimise impact of development on high quality or rare soils
- Encourage adaptation to climate change including directing development away from areas at risk of flooding, and ensuring that development does not increase flood risk in other areas
- Ensure that the LDP helps manage air quality issues in the area

## PHYSICAL CHARACTERISTICS

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### Transport and Accessibility

109. The A1(T), the East Coast Main Line and the North Berwick Branch Line are the main strategic transport corridors in the area. The A1(T) has a junction with the A720 Edinburgh City Bypass as well as a number of interchanges along its length that provide access to settlements, other destinations and routes. The A1(T) has been improved with the dualling of the A1 Expressway between Haddington and Dunbar, which increased accessibility and reduced journey times to Dunbar.
110. While East Lothian is relatively well served by east-west strategic transport infrastructure, the underlying problem is a lack of capacity, particularly in the face of a growing population and consequential travel demand expected to increase in coming years, even without factoring the effects of planned growth that is yet to be delivered.
111. Trunk road capacity is already a problem in the west of East Lothian. Existing capacity constraints during peak hours are highlighted by Transport Scotland at Old Craighall Junction which will impact on further development in East Lothian. Concern has also been expressed at other A1(T) interchanges west of the Gladsmuir Interchange. Any re-routing generated by the introduction of a second half diamond at the Queen Margaret University Junction may assist short term with capacity at Old Craighall Junction, although the extent of this is unclear.
112. Capacity constraints on the East Coast Main Line affect scheduling for local services on it as well as those from the North Berwick Branch Line. Six rail halts are located on the main line at Musselburgh, Wallyford, Prestonpans, Longniddry, Drem and Dunbar, with North Berwick Station on the branch. Station safeguards are made at Musselburgh, East Linton and Blindwells. Trains are full at peak times and there is a need to lengthen existing station platforms to accommodate larger trains as well as a need to expand station car parks.
113. Buses serve the area with more frequent services into Edinburgh from the west of East Lothian than the east. Commuting bus services are full at peak times, and while local bus services serve the main settlements as well as those in the countryside, their frequency as well as the timetabling between them and other public transport modes could be improved to secure better public transport integration. A route for the anticipated Tram Line Three is safeguarded, but no progress has been made on that project.
114. The transport network and services in the west are already experiencing immediate impacts which have been compounded by commuting travel patterns from the east causing issues 'down line'. These existing capacity constraints have been caused by the cumulative impact of population and traffic growth in and through the area consequent on existing levels of use and, when combined with the anticipated impacts from planned population increase in East Lothian, the situation is expected to worsen.
115. Figure 50 illustrates the accessibility of areas in East Lothian to services and facilities. It is based on data from the 'Geographic Access to Services' domain of the Scottish Index of Multiple Deprivation (SIMD). Accessibility is assessed by looking at both the time it takes to drive to reach services and the time it takes to reach services by public transport. The services assessed include GP surgeries, fuel stations, post offices, retail centres, and primary and secondary schools. The accessibility of these data zones to such services is presented in terms of their relative 'deprivation' measured against other data zones in Scotland. A considerable part of rural East Lothian comprises data zones

that fall within the 10% most 'deprived' (i.e. least accessible) in Scotland. In contrast, the main East Lothian towns show up as being significantly more accessible.

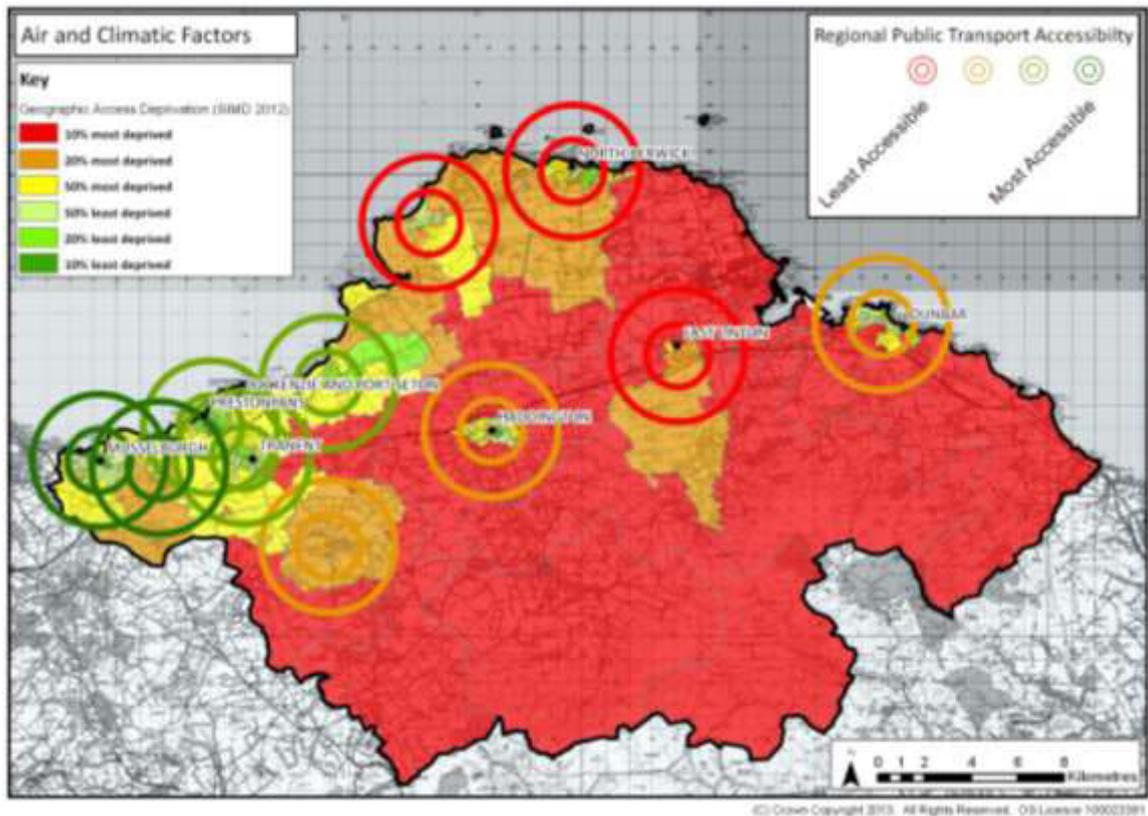


Figure 50: Accessibility in East Lothian

116. It is also important to consider how people can access higher level services as well as day to day facilities. Modelling work undertaken to inform SESplan assessed the overall accessibility by public transport of 71 settlements across South East Scotland to regional scale employment, health and retail services, and ranked all the settlements according to how accessible they are. The table below illustrates the results for East Lothian settlements and clearly shows that Musselburgh has the best accessibility to regional scale services by public transport whilst in contrast East Linton, Gullane and North Berwick have the poorest accessibility.

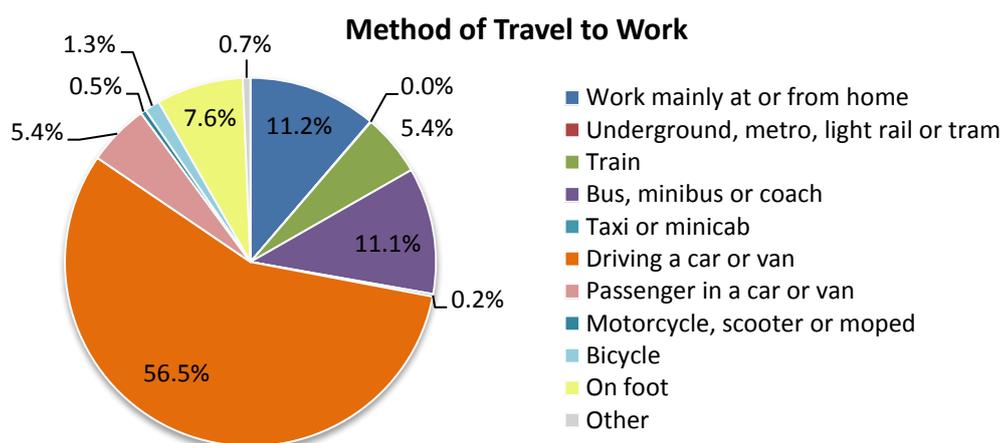
Settlement Name	PT Access to employment rank	PT Access to Regional Health - Rank	PT Access to Regional Retail - Rank	Regional PT Access - Composite Rank
Dunbar	47	52	62	54
East Linton	53	68	64	64
Gullane	55	67	61	62
Haddington	46	61	56	55
Longniddry	39	60	45	49
Musselburgh	13	10	4	2
North Berwick	50	71	57	60
Pencaitland	52	63	51	57
Prestonpans	30	49	31	39
Tranent	36	43	39	44
Wallyford	20	34	25	28

Source: SESplan Transport Technical Note, November 2011

Figure 51: Accessibility of East Lothian's Settlements at a Regional Scale

## Commuting Patterns

117. The Annual Population Survey (2011) illustrates the substantial out commuting that takes place from East Lothian to Edinburgh. The Survey calculates that 16,000 people commute from East Lothian to work in Edinburgh, whilst approximately 25,000 commutes are contained within East Lothian. Only about 2,500 journeys are made by people living in Edinburgh and commuting to East Lothian.
118. The Census (2011) collected information on people's method of travel to work and showed that over 60% of East Lothian's working population travel to work by car or van, which is a slightly higher proportion than the average across Scotland.



Source: Census 2011

Figure 52: Method of Travel to Work

119. The proportion of East Lothian's residents who commute by train is higher than for Scotland as a whole and has increased in recent years. However, with existing peak time rail services running at capacity, improvements will be needed to ensure that commuting by train remains an attractive option and growth in commuting by train can continue. The following table indicates levels of passenger usage at stations within and immediately adjacent to East Lothian. All stations show a significant increase in passenger levels, particularly at Prestonpans where investment was made in additional car parking facilities.

Station Name	Local Authority	2011-12 Entries & Exits	2012-13 Entries & Exits	% Change
Newcraighall	Edinburgh City Of	191,032	206,930	8.32%
Brunstane	Edinburgh City Of	132,806	144,182	8.57%
Musselburgh	East Lothian	386,738	420,834	8.82%
Wallyford	East Lothian	240,842	255,810	6.21%
Prestonpans	East Lothian	210,638	237,070	12.55%
Longniddry	East Lothian	163,410	177,840	8.83%
Drem	East Lothian	105,650	113,556	7.48%
North Berwick	East Lothian	470,082	489,680	4.17%
Dunbar	East Lothian	362,852	374,216	3.13%
		<b>2,264,050</b>	<b>2,420,118</b>	<b>6.89%</b>

Figure 53 Rail Passenger Use of Stations Source: Office of Rail Regulation

## Water and Drainage Capacity

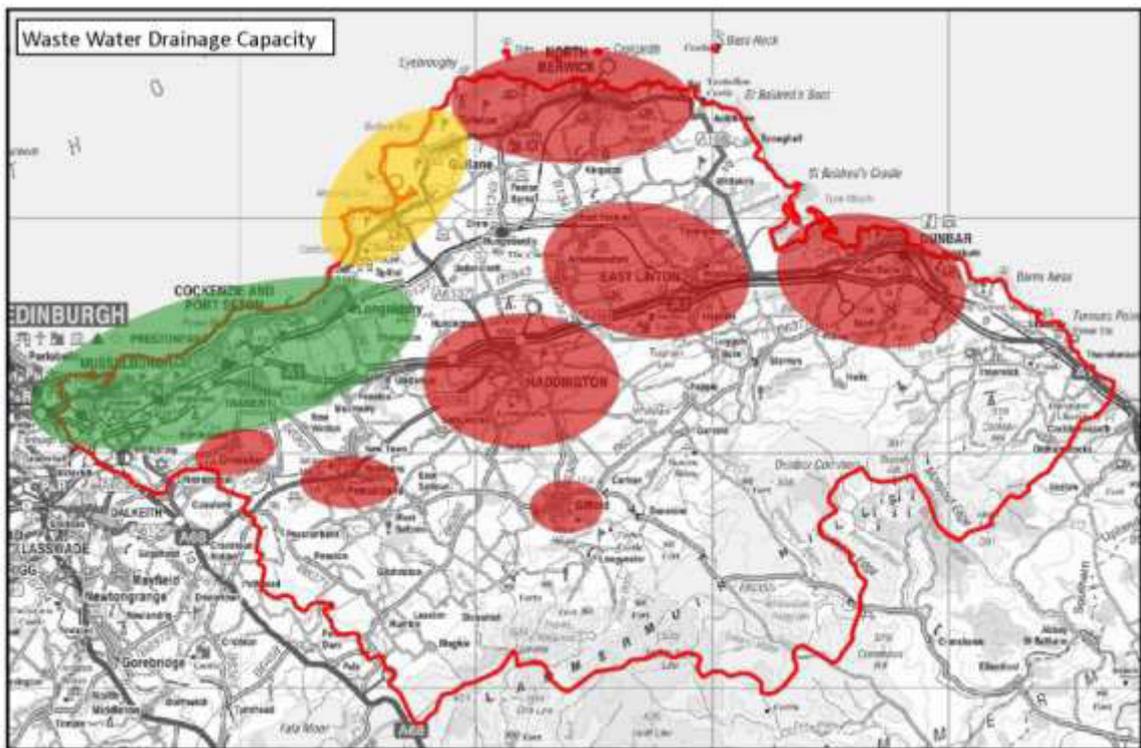
120. In general terms, to support development, Scottish Water (SW) is funded to provide strategic capacity that may be required to increase the capacity for water supply and waste water treatment ('Part 4' assets) in association with development: where additional capacity is needed to being forward development, developer contributions are not required.
121. However, where capacity is available in SW strategic Assets there should be a preference to utilise it where appropriate as part of the planning strategy before new capacity is provided. If new strategic capacity is required to facilitate development in the right place, it is necessary to consider how long it will take to put in place to ensure it is timed to enable development. The implications of this on any programme of development must be considered. Normally the preference is to secure connections to SW networks. The consultation zones for SW strategic assets and their capacity status is provided below:

SCOTTISH WATER CONSULTATION ZONES / STRATEGIC ASSET CATCHMENTS AND CAPACITY STATUS				
	Water Supply	Status	Waste Water	Status
<b>Musselburgh / Wallyford / Whitecraig / Tranent</b>	Rosebery / Glencorse / Castle Moffat	Capacity	Seafeld WWTW	Available Capacity
<b>Prestonpans / Cockenzie / Port Seton / Blindwells</b>	Rosebery / Castle Moffat	Capacity	Seafeld WWTW	Available Capacity
<b>Ormiston</b>	Rosebery	Capacity	Ormiston WWTW	Very Limited Capacity
<b>Pencaitland</b>	Rosebery	Capacity	Pencaitland WWTW	Very Limited Capacity
<b>Elphinstone</b>	Castle Moffat	Capacity	Ormiston WWTW	Very Limited Capacity
<b>Haddington</b>	Castle Moffat	Capacity	Haddington WWTW	Very Limited Capacity
<b>Gifford / Bolton</b>	Hopes	Capacity	Gifford WWTW	Very Limited Capacity
<b>East Linton</b>	Castle Moffat	Capacity	East Linton WWTW	Very Limited Capacity
<b>Stenton</b>	Castle Moffat	Capacity	Stenton WWTW	Limited Capacity
<b>Dunbar</b>	Castle Moffat	Capacity	Dunbar WWTW	Very Limited Capacity
<b>West Barns / Dunbar</b>	Castle Moffat	Capacity	West Barns Sep	Very Limited Capacity
<b>Innerwick</b>	Castle Moffat	Capacity	Innerwick WWTW	Limited Capacity
<b>North Berwick / Dirleton</b>	Castle Moffat	Capacity	North Berwick WWTW	Very Limited Capacity
<b>Gullane / Aberlady</b>	Castle Moffat	Capacity	Gullane WWTW	Limited Capacity
<b>Athelstaneford</b>	Castle Moffat	Capacity	Athelstaneford	Very Limited Capacity

122. Including all planned and committed development proposals, capacity exists at SW strategic assets serving settlements in the west of East Lothian. There are currently four drainage constraints to

further significant growth at Haddington, East Linton, Dunbar and North Berwick. While these constraints could be overcome with investment, this is not identified as a funding priority by SW at this time. SW would require its 5 growth criteria to be met before it could initiate a growth project. At North Berwick, as a consequence of the foul drainage needs of strategic housing allocations at Mains Farm and Gilsland, the town's Waste Water Treatment Works (WWTW) is very near capacity. A 10,000 population limit is set on the current WWTW which has a catchment that includes Dirleton. SEPA has indicated that further increase in population within this catchment area would require a step change in the type of treatment infrastructure. Scottish Water suggests that a £15m – £20m investment may be required. An increase in capacity at East Linton WWTW to accommodate an existing allocation at Orchardfield is planned but is subject to an Environmental Impact Assessment due to the existence of protected species in the area.

123. The other items of water/waste water infrastructure required to enable development include new water mains or treated water storage tanks (Part 1, 2 and 3 assets or the 'local network') and on site pipe work. These remain the responsibility of developers to provide, although SW may make a contribution under the Reasonable Cost Contribution (RCC) provisions which in part act to mitigate such expense. Therefore, with the exception of Haddington, East Linton, Dunbar and North Berwick the water / waste water infrastructure issues in the area will be in relation to the Part 1 to 3 costs involved in mitigating any impact of the development on the local network. In some cases further investigation may be required in respect of water supply and / or a drainage impact assessment may be needed to ascertain impact of development on the local network.



124. Where there is no public water supply network within the vicinity, there would be a need either for a private water treatment system or to lay new water infrastructure to the existing public network, and early discussion with Scottish Water would be required. Where there is no public sewer network a private wastewater treatment system may be required and discussion with SEPA to discuss specific requirements would be essential.

## Education

125. East Lothian is served by six secondary schools, one in each of the main towns. The projected significant increases in population in East Lothian will place considerable pressure on the area's schools and many will require expansion in order to accommodate extra pupils that will be generated from committed and future housing developments.
126. The Council has undertaken an assessment of its current education estate to establish the ability of each school to expand taking into account future pupil roll projections and the physical potential for school expansion as summarised below:

Secondary School	Current Situation	Potential for Expansion
<b>Musselburgh Grammar</b>	The school requires to expand beyond its current 1,350 pupil capacity to accommodate existing committed housing developments.	The school has a restricted campus and the potential for further significant expansion above that already committed on its site is limited.
<b>Preston Lodge High School</b>	The school has sufficient available capacity to accommodate committed housing development in its catchment area.	There is potential to accommodate some further expansion beyond that already committed.
<b>Ross High School, Tranent</b>	The School has additional accommodation committed to accommodate current housing commitments.	There is potential to accommodate some further expansion beyond that already committed.
<b>Knox Academy, Haddington</b>	The school requires to expand to accommodate existing committed housing developments.	There is potential for moderate expansion beyond that already committed.
<b>Dunbar Grammar</b>	The school requires to expand to accommodate existing committed housing developments	There is potential for moderate expansion beyond that already committed.
<b>North Berwick High School</b>	The school requires to expand to accommodate existing committed housing developments	There is potential for moderate expansion beyond that already committed.

127. Capacity in East Lothian's primary schools is also limited and will need to be increased to accommodate the scale of growth being planned through the ELLDP.

	Current Situation	Potential Future Capacity
<b>Musselburgh Area</b>	Some limited capacity is available in existing primary schools to the west of the town, but elsewhere in the settlement the capacity of existing facilities is projected to be reached as a result of natural change in the baseline pupil roll projections and / or existing housing commitments in the area.	The existing primary schools are generally landlocked and unable to expand further. A moderate expansion of the committed new Wallyford Primary School (once it is in place) would be possible. There would also be scope for a potential expansion at Whitecraig Primary School. If a significant amount of new housing is planned for in the area it would likely require more new primary school(s).
<b>Prestonpans Area</b>	Prestonpans Infant and Primary Schools are projected to reach capacity with current housing commitments in the area. Cockenzie Primary School has some available capacity. Longniddry and St Gabriel's Primary Schools have a limited	There is no potential to expand Prestonpans Infant and Primary Schools. Cockenzie Primary School has some potential for further modest expansion on site. Longniddry and St Gabriel's RC Primary Schools have no potential for further

	amount of spare capacity.	expansion on site beyond their current size.
<b>Tranent Area</b>	Windygoul Primary School in Tranent has significant capacity issues that may require expansion on to adjacent land to resolve.	Sanderson's Wynd, Tranent, and Macmerry Primary Schools have some potential for moderate expansion. Elsewhere, the potential for primary school expansion is very limited.
<b>Haddington Area</b>	Haddington Infant, Kings Meadow Primary School and St Mary's RC Primary School have no spare capacity beyond current housing commitments.	Haddington Infant, Kings Meadow Primary School and St Mary's RC Primary School have no scope for further expansion. The proposed Letham Primary School has some potential for moderate expansion. Yester Primary School has some potential for moderate expansion.
<b>Dunbar Area</b>	Dunbar Primary School is to be expanded for existing housing commitments to accommodate circa 1,100 pupils. Elsewhere, limited spare capacity is available at East Linton, Innerwick and Stenton Primary Schools.	Further moderate expansion of Dunbar Primary School may be possible but the pupil roll is already very large. Some additional capacity provision is possible at East Linton and Innerwick Primary Schools while West Barn Primary School has the potential for moderate expansion.
<b>North Berwick Area</b>	Law Primary School is to be expanded for existing housing commitments following the realignment of Haddington Road. Dirleton and Athelstaneford Primary Schools have very limited spare capacity. Most other primary schools either have spare capacity or are capable of some expansion.	Further moderate expansion of Law Primary School may be possible. Dirleton and Athelstaneford Primary Schools cannot be expanded further on their current sites. Gullane Primary School has potential for some moderate expansion.

## Waste

128. The Scottish Government launched Scotland's first 'Zero Waste Plan' on the 9th June 2010. The Plan sets out the Scottish Government's vision for a zero waste society. This vision describes a Scotland where all waste is seen as a resource; waste is minimised; valuable resources are not disposed of in landfills, and most waste is sorted, leaving only limited amounts to be treated. The Plan contains a range of measures to help achieve its goals and includes targets to be achieved by 2025 that 70% of all waste is recycled and a maximum of 5% is sent to landfill. It also set a target for 50% of waste to be recycled by 2013.
129. In 2011, 44.08% of the 23,432 tonnes of household waste generated in East Lothian was recycled, composted or prepared for reuse. In 2012 44.85% of the 23,480 tonnes of household waste generated was recycled, composted or prepared for reuse.<sup>24</sup>
130. The Zero Waste Plan explains that the planning system has an important role in delivering waste management facilities to ensure the objectives and targets of the Zero Waste Plan are met. Moving to zero waste means more facilities will be required to collect, sort, reuse, recycle and process waste. There will also be opportunities to harness heat and power generated from waste recovery processes.

<sup>24</sup> Scottish waste data interrogator, available online at [http://www.environment.scotland.gov.uk/get\\_interactive/data\\_visualisation/household\\_waste.aspx](http://www.environment.scotland.gov.uk/get_interactive/data_visualisation/household_waste.aspx)

131. Scottish Planning Policy (SPP) requires that all development plans must identify appropriate locations for all waste management facilities, allocating where possible specific sites and providing a policy framework which supports the development of these facilities. Local Development Plans can also promote sustainable waste management by including policies that require developments to be designed to maximise recycling opportunities by ensuring that appropriate waste collection and storage facilities are designed into schemes.

## Energy

132. East Lothian has, until recently, hosted two major power stations. Cockenzie coal fired station, operating from 1967 until its recent closure in March 2013, was rated at 1200MW. It is now in the process of being decommissioned. Although the closure of the plant reduces the electricity generation capacity of the county, it should bring benefits in terms of air quality and as a consequence, the health of the population. There is consent for a replacement gas power station, however, it is not certain that this will be implemented. Torness, a nuclear station south of Dunbar rated at 1364MW, has a licence to operate until 2023.
133. The amount of renewable energy installations constructed in East Lothian has led to an increase in the overall output of renewable energy since 2008, albeit from a low base. Wind energy has been the main technology to come forward. Aikengall windfarm became operational in 2009 (48MW), followed by Crystal Rig 2 and 2a in 2010 (73MW on the East Lothian side). Wester Dod received consent for most of the proposed turbines in 2013 (65MW). There is consent for a further windfarm at Wester Dod, Monynut (68MW). Applications for extensions to both of these windfarms are currently with Scottish Ministers.
134. Medium scale developments have been consented at Pogbie and Keith Hill, by Dun Law, which together will have rated capacity of around 12MW. Consented smaller scale development in the lowland areas of East Lothian, have a combined rated capacity of 4.6MW (1.1MW of which is the 2 turbines consented Ferneylea). Not all of these turbines have yet been constructed.
135. An Energy from Waste Plant at Oxwellmains was consented in 2010, and which would export around 22MW to the grid. This was also intended to incorporate a combined heat and power facility, but has yet to be constructed. A gas utilisation plant does operate at Oxwellmains, in relation to the landfill site there, and is rated at 4MW. For hydro, there is a small scale scheme at Castle Moffat, mainly to meet Scottish Waters own requirements, and a couple of domestic scale installations. There have been planning consents for solar arrays at Fenton Barns and Stenton, as well as various consents for panels mounted on buildings.
136. Some forms of very small scale renewable energy generation (microgeneration) benefit from permitted development rights, the rules changing in 2009. These include ground, water and source heat pumps, solar panels, as well as flues for biomass and combined heat and power generation. It is no longer possible to monitor the spread of these technologies through planning applications, however, it is evident that solar panels are becoming an increasingly common sight on the roofs of properties throughout East Lothian. They may benefit from support from the government in the form of Feed-in Tarriffs, which provide guaranteed price for the electricity exported. Figure 54: Rated capacity of Feed in Tarriff installations, 2013below shows the contribution of installations which benefit from Feed in Tarriffs (2013). There have been no community installations, although this is strongly supported by Scottish Ministers.

Technology	Domestic Installations East Lothian	Domestic Installations Installed Capacity (MW)	Commercial and Industrial Installations	Commercial and industrial Installations Installed Capacity (MW)	Community Installations	Community Installations Installed Capacity (MW)	Total Installations	Total Installed Capacity (MW)
Hydro	1	0.029	0	0.000	0	0.000	1	0.029
Photovoltaic	560	1.979	26	0.893	0	0.000	501	2.872
Wind	12	0.172	9	0.114	0	0.000	21	0.286
Total Installed Capacity (MW)	2.179		1.07		0.000		na	3.186
Total Installations	573		35		0		608	na

**Figure 54: Rated capacity of Feed in Tarriff installations, 2013**

137. European Council Directive 96/82/EC (Seveso 11) requires that land use policies take the objectives of preventing major accidents and limiting the consequences of such accidents into account. Whilst East Lothian has no Major Hazard Sites, as defined by the Health & Safety Executive, Torness Nuclear Power Station does lie within the area. There are also a number of major pipelines carrying gas throughout the area, and these and their associated safety zones are shown in Figure 55 below. Certain types of planning applications within these safety zones require to be referred to the Health and Safety Executive who may either 'Advise Against' or 'Don't Advise Against' the granting of planning permission on health and safety grounds that arise from the possible consequences of a major accident at the hazardous installation or pipeline. The location of these safety zones will also therefore need to be taken into account in the allocation of new development sites in the Local Development Plan. In addition to the gas pipelines shown, there is also consent for a gas pipeline connecting the consented Cockenzie gas fired power station to the main St Fergus pipeline.

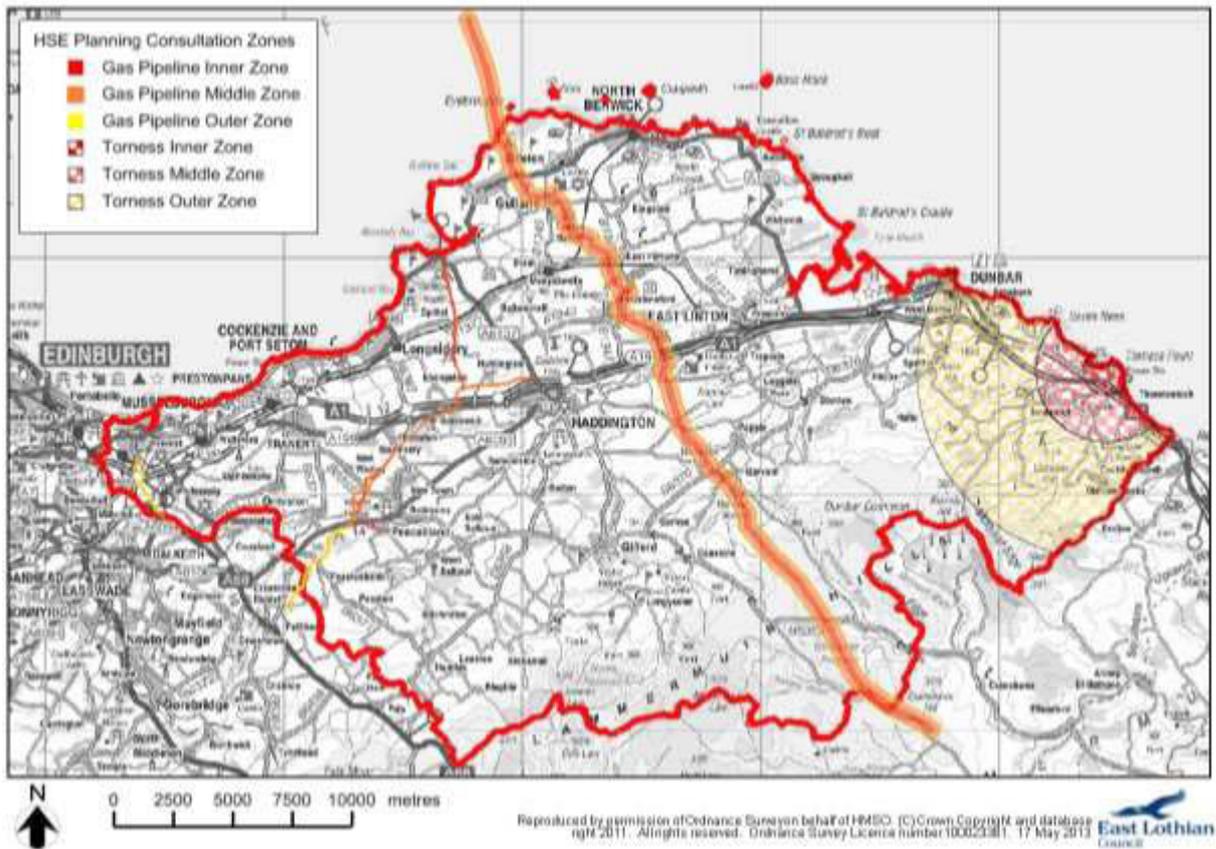


Figure 55: HSE Planning Consultation Zones

### Physical Characteristics: Key Issue for ELLDP

- Lack of capacity of parts of the strategic transport infrastructure
- Safeguarding of a route for Tram Line 3
- Poor accessibility of much of the eastern area
- Overall amount of car commuting
- Limited capacity of waste water treatment infrastructure in some areas
- Ensure that new housing development is directed towards locations where education infrastructure is or can be made available
- Ensure the objectives and targets of the Zero Waste Plan are met

## PART 2: IMPACT OF THE LOCAL PLAN 2008

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### *Has the Local Plan 2008 achieved what it set out to do?*

138. This part of the monitoring statement considers the impact of the policies and proposals of the East Lothian Local Plan 2008, and explores the extent to which the strategy of the current local plan has been delivered. Planning Circular 1/09 states that the monitoring statement should focus on how far the objectives and vision of the previous plan have been realised.
139. The East Lothian Local Plan was adopted by the Council on 28<sup>th</sup> October 2008. It recognises East Lothian's role in supporting the growth of the Edinburgh city region which is a major driver of the Scottish economy. The Local Plan therefore adopted a strategy that carefully manages change and accommodates growth, while at the same time retains East Lothian's key assets including its high quality natural environment and built and cultural heritage. The strategy seeks to accommodate the required level of growth in the area including a share of the city region's housing requirement, without compromising the character of existing settlements and their wider landscape setting, and it recognises the limited capacity of most settlements in East Lothian to accept significant levels of growth.
140. Key objectives of the Local Plan can be summarised as:

- To focus development in locations that do not compromise existing assets of value, and where other benefits can be achieved.
- To deliver strategic housing sites and ensure that a range of different sizes and types of housing is provided to address housing need, particularly affordable.
- To encourage employment development in order to try and reduce the high levels of out commuting from the Council area.
- To safeguard the vitality and viability of East Lothian's town centres, village centres and local shopping facilities.
- To ensure that development reduces the impact of the private car and maximises opportunities to use public transport.
- To carefully control the type and location of development allowed in the East Lothian countryside.
- To protect and enhance the quality of the natural and built environment.
- To improve the design quality of new development and to encourage housing layouts that incorporate home zone principles.
- To ensure that the level of new development is supported by the provision of appropriate infrastructure and that necessary social, education and community facilities are provided by developers where required as a result of their developments.

141. This section firstly begins by looking at how far the above objectives have been realised. It considers whether the Local Plan has helped deliver the right quantity and types of development in the right locations, and if the policies of the Plan have been successful in ensuring high quality sustainable development, supported by the necessary infrastructure and services.
142. This section focuses on the big issues and overall impact of the Local Plan and by doing so raises a number of issues that need to be considered in the Main Issues Report.

143. The monitoring statement then goes on to present all the policies of the Local Plan and provides a brief commentary on each, outlining the extent to which it has been used during the Local Plan period, whether it has been successful in its aims, whether any changes are required, and whether it is still relevant for the LDP. This will inform discussion in the MIR by identifying policies from the current plan that may need amending, deleting or can be largely continued in their current form.

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### *Has the Local Plan focused development in the right locations?*

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#### **Housing and Employment**

144. The current Local Plan strategy was guided by the requirements of the Edinburgh and the Lothians Structure Plan, which acknowledged that East Lothian is part of the wider Edinburgh housing market and travel to work area. The Structure Plan required the Local Plan to provide for population and household growth and to accommodate a proportion of growth generated by Edinburgh, in addition to meeting the housing need generated from within East Lothian.
145. The Local Plan sought to accommodate the required housing growth, and to co-locate it with additional employment opportunities in order to help promote the area's economic growth and to try and reduce the high levels of out commuting to Edinburgh. The Local Plan identified six main growth opportunities in the area, which aligned with the 'Core Development Areas' identified in the Structure Plan. These included a new mixed use settlement at Blindwells, and a large scale mixed use expansion of Wallyford. Growth opportunities were identified within/on the edge of each of East Lothian's main settlements including a strategic housing site at Pinkie Mains in Musselburgh and a large business park allocation at Craighall, a housing allocation for 750 homes at Letham Mains in Haddington, a housing allocation for 525 homes at Hallhill south west in Dunbar and housing sites for 540 homes at Gilsland and Mains Farm in North Berwick. The development locations were identified due to their accessible locations near to key transport corridors and public transport services, and because they were suitable locations in terms of their ability to be accommodated within local landscape capacity, as well as being able to be served by the required infrastructure. The identified growth locations in the west of East Lothian were also specifically identified to help deliver regeneration benefits, in recognition of higher levels of deprivation in this area.
146. The strategy of the Local Plan was effectively one of 'dispersed' growth across all of East Lothian's main settlements and the creation of a new settlement at Blindwells. Whilst the Local Plan focused development in locations in accordance with the Structure Plan requirements, since its adoption there has been limited delivery of these sites in terms of built development on the ground. The challenging economic climate of recent years has undoubtedly hampered the delivery of the strategic allocations in the Local Plan, given their significant infrastructure funding requirements, and the wider impact of the economic downturn on the development industry.
147. The current 'dispersed' strategy does focus a significant proportion of development in locations in the east of East Lothian which are further from the areas of greatest housing demand around the City of Edinburgh, and from the concentration of jobs and economic growth in the city. During buoyant economic times however the whole of East Lothian has proven marketable as a location for housing development. The towns in the east of East Lothian are however less desirable as a location for economic development and significant job creation when compared to other better connected areas to the west of the city region.

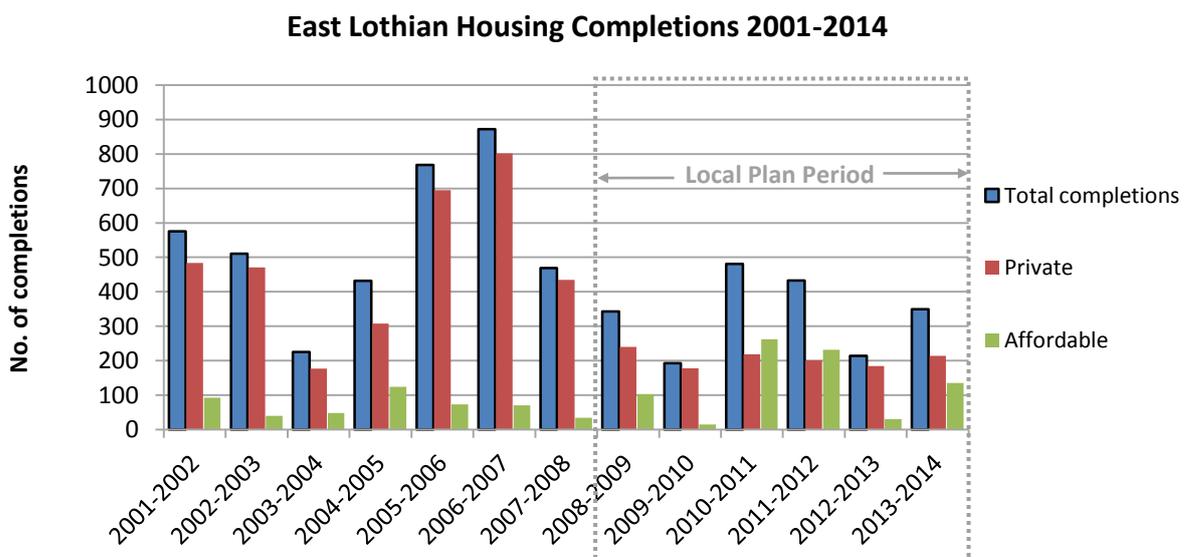
148. Before the downturn, there was expectation that large allocations in main towns, with their commensurate infrastructure requirements, would be economically viable. However, wider economic factors have made development of these sites less viable. Consequently, there has been less development than anticipated. In turn, this has led to a shortfall in the housing land supply resulting in planning applications for housing on non-allocated sites, some of which have been allowed at appeal. To address this situation, the Council introduced Housing Land Supply - Interim Planning Guidance, which set out criteria against which applications on non-allocated sites would be assessed against.
149. SESplan requires Local Development Plans to build on their existing committed development therefore the main locations for growth identified in the Local Plan will be rolled forward into the LDP. It is considered that the long term intentions of the current Local Plan remain valid and the locations identified for development were appropriate and should continue to be brought forward.

### Key Issue for ELLDP

- Ensuring the new development is capable of being provided with all the necessary infrastructure

### Has the Local Plan delivered the right amount and type of housing?

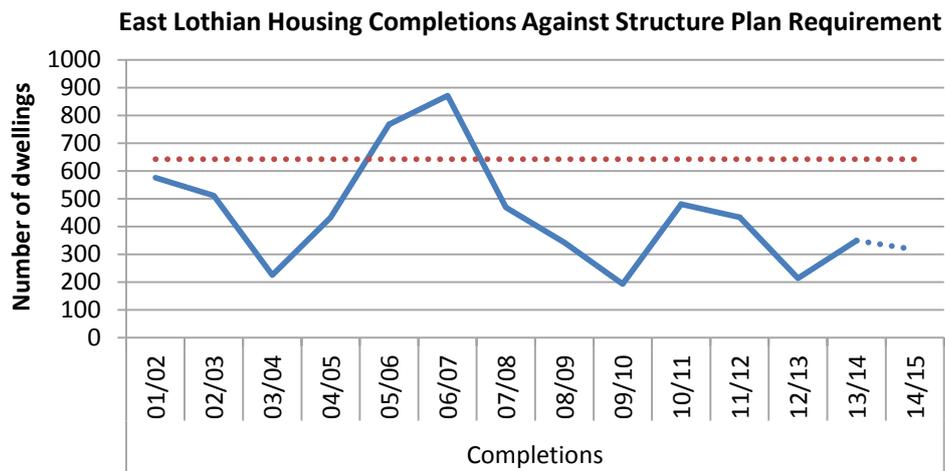
150. The Structure Plan set a requirement for the amount of houses to be built in East Lothian over the period 2001-2015. It required 70,200 homes to be built across Edinburgh and the Lothians, with 9,000 of those to be within East Lothian, which equated to an average requirement of 643 homes per year.
151. The graph below illustrates housing completions in East Lothian in the period 2001-2013.



Source: ELC Housing Land Audits

Figure 56: Housing Completions

152. Housing completions in East Lothian peaked in 2006-2007 at 872 dwellings in that year. The subsequent economic downturn significantly impacted upon housing delivery in East Lothian, and since the adoption of the Local Plan in October 2008 house building levels have not risen above 481 completions in any year. There was a slight recovery in house building levels between 2010 and 2012 but these were largely accounted for by Council/Housing Association building supported by public sector finance rather than private sector speculative house building.
153. The average annual requirement of 643 dwellings was exceeded in two years of the Structure Plan period (2005/06 and 2006/07) and has not been reached since the Local Plan was adopted, largely attributable to the economic downturn and difficult market conditions.



*Based on 2013 Housing Land Audit*

**Figure 57: Housing Completions against Structure Plan requirements**

154. To take account of fluctuating completion rates, the housing requirement was recalculated on a yearly basis to take account of completions to date. A new annual requirement was calculated based on the total remaining houses required to be completed in the Structure Plan period (to 2015), divided by how many years were left in that period. The graph below illustrates the recalculated annual housing requirement based on past completions.
155. Based on Housing Land Audit programming and the fact that completions have been consistently below the annual requirement, the Structure Plan target could not be met as it would have required over 3500 houses to be built in the final three years of the Structure Plan. Of the 9,000 homes required to be built in the period 2004-15, taking into account completions from 2001-2012 and forecasted completions from 2012-2015 (based on 2012 Housing Land Audit), it is predicted that by 2015 a total of 6,179 homes will be built, out of the 9,000 requirement, resulting in a significant shortfall.

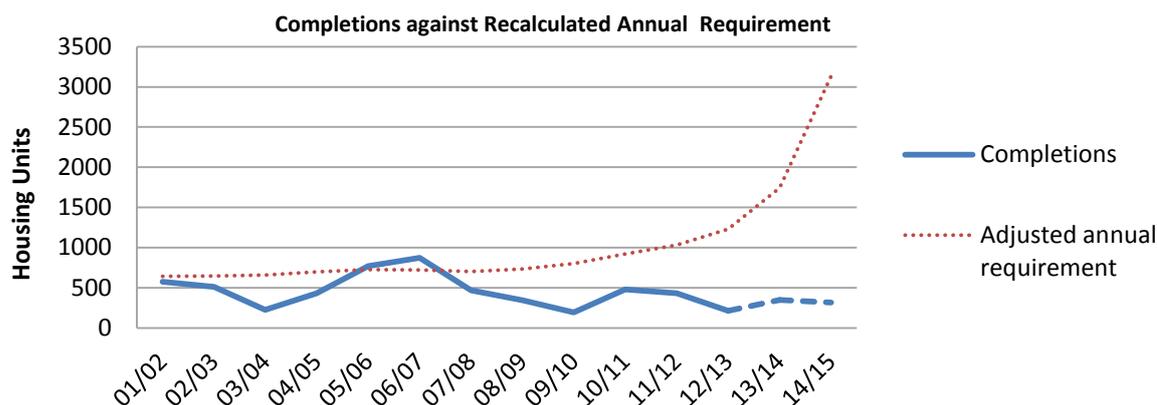


Figure 58: Housing Completions against Recalculated Annual Requirement

## Strategic Housing Proposals

156. In accordance with the six East Lothian Core Development Areas identified in the Edinburgh and the Lothians Structure Plan 2015, the East Lothian Local Plan allocated land for seven strategic housing sites distributed across the area. The table below illustrates the progress made in bringing these sites forward since the adoption of the Local Plan:

Proposal	Location	Area (Ha)	Capacity (Units)	Current Status
<b>Blindwells</b>				
H1	Blindwells New Settlement	132	1600	Application for planning permission in principle submitted in March 2011 for mixed use scheme including up 1600 dwellings, and is pending consideration.
<b>Dunbar</b>				
H2	Hallhill South West	20	500	Outline planning permission for 525 units approved January 2012. Approval of matters specified in conditions granted in March 2013 and further approvals after in 2014.
<b>Haddington</b>				
H3	Letham Mains	43	750	A planning application for the western part of the site (433 dwellings) was submitted in July 2013 and is pending consideration. A planning application for the eastern part of the site (377 dwellings) was submitted in February 2014 and is pending consideration. A planning application has also been submitted for a new primary school.
<b>Musselburgh</b>				
H4	Pinkie Mains	23.7	450	Outline planning permission granted November 2011. Full permission for 473 units approved March 2012 and work has begun onsite, with 52

				completed units at 31 <sup>st</sup> March 2014.
<b>North Berwick</b>				
<b>H5</b>	Mains Farm	38	400	Application for planning permission in principle for 420 houses submitted in March 2013. Planning permission granted in 2014. Planning application for approval of matters specified in conditions for 113 units submitted.
<b>H6</b>	Gilsland	8.0	100	Full permission for 49 dwellings on the caravan site granted in February 2013 and work has begun on site. Full planning permission for 71 dwellings on the Newhouse site granted in April 2013.
<b>Wallyford</b>				
<b>H7</b>	Land to South, East and West of Wallyford	85	1000	Outline planning permission for 1050 units granted November 2009. Renewal of planning permission granted. Application for renewal of planning permission minded to be granted.
<b>TOTAL</b>			<b>4800</b>	

**Figure 59: East Lothian Local Plan Strategic Housing Proposals**

157. The above table demonstrates varying levels of progress in the delivery of the strategic housing sites allocated in the plan, with the most advanced site being Pinkie Mains which has started to deliver completions. The majority of the sites now have either detailed or planning permission in principle and are considered to be effective and capable of delivering housing completions within the next 5 years.

## Housing Allocations

158. In addition to the seven strategic housing sites, the Local Plan also allocated a range of smaller sites for housing development and the table below illustrates the progress made on these proposals since the adoption of the Plan.

Ref	Location	Size (ha)	Capacity	Current Status
<b>H8</b>	North Glebe, Athelstaneford	1.7	30	9 houses completed on western part of allocation. Remainder remains undeveloped with no planning permission.
<b>H9</b>	New Manse, Dirleton	0.4	7-10	Permission for 9 units granted 2006. 9 units complete.
<b>H10</b>	Station Road Field, Dunbar	1.1		Planning permission in principle granted in November 2010 for 60 bed nursing home and sheltered housing (14 units). A 2 year time extension was subsequently permitted. An application for 17 houses submitted in September 2013 was recommended

				for approval but refused at Committee in April 2014. Currently the subject of appeal.
<b>H11</b>	Ashfield North East, Dunbar	1.4	32	Planning permission for 32 houses granted August 2007. 32 units complete.
<b>H12</b>	Kellie Road, Dunbar	0.36	8	Planning permission for 16 flats granted in December 2012. Under construction.
<b>H13</b>	Assembly Rooms/Coastguard Site , Lamer Street, Dunbar	0.13	12	Full planning application submitted in 2006 but not determined. Site has been removed from the Council's house building programme.
<b>H14</b>	Former Bellevue Hotel, Dunbar			Planning permission and listed building consent granted 2005. Development of 51 sheltered accommodation units.
<b>H15a</b>	Lochend Hallhill, Dunbar	6	130	Full planning permission for 130 units granted June 2011, extra 8 units permitted in subsequent application. At 04/2013 61 units completed. Under construction.
<b>H15b</b>	Ashfield South, Dunbar	2.25	90	Permission approved 2009. 88 units completed.
<b>H16</b>	Orchardfield, East Linton	4	50	Planning permission granted in February 2011. Development commenced in Spring 2013.
<b>H17</b>	Gifford Garage, Gifford	0.3	7-10	No application submitted.
<b>H18</b>	Adam Paterson Mill, Haddington	0.7	40	Planning permission for the conversion of the mill to 6 dwellings was retrospectively granted in April 2013 and development complete.
<b>H19</b>	Former Station Site, Macmerry	0.4	10	Application for 10 houses and 4 flats permitted May 2011. 14 units completed.
<b>H20</b>	Macbeth Moir Avenue, Musselburgh	0.15	25	Site completed.
<b>H21</b>	Balcarres Road, Musselburgh	0.33	25	24 units completed 2007-2008.
<b>H22</b>	Lochbridge Road, North Berwick	1.8	40	Full planning permission for 28 houses and 14 flats granted May 2012 and site is now complete.
<b>H23</b>	Limeylands Road, Ormiston	3.3	50	Planning application for 37 houses on part of site granted October 2012.
<b>H24</b>	Land at Moffat Road, Ormiston	0.14	20	Permission for 12 flats granted in April 2008. Development complete.
<b>H25</b>	Park View, Pencaitland	2.5	30	No planning application submitted.
<b>H26</b>	Land to South of Tranent Mains farm House, Tranent	0.75	22	Outline planning application for 29 units submitted in 2006, granted in August 2013. An approval of matters application submitted in August 2013

					and pending consideration.
<b>H27</b>	Land North of Muirpark Wynd, Tranent	3.5	70		Permission for 84 houses and 16 flats granted in April 2010. Development completed (100 units).
<b>H28*</b>	Former Salt Store, Cockenzie	0.27	22		Completed.
<b>H29*</b>	Small sites in Dunbar with Planning Permission		244		Bellhaven Hospital – not implemented Lamer Street – not implemented Cossar’s Wynd – not implemented 44 High Street – not implemented. Bellhaven Road – Permission for 18 units, 15 complete. Abbeylands (Garage) – not implemented.
<b>H30*</b>	Land east of Muirfield Drive, Gullane	1.7	29		Development completed (29 units).
<b>H31*</b>	Sites in Haddington with Planning Permission				Maltings – development completed. Briery Bank – development completed. Hopetoun Unit – not implemented.
<b>H32*</b>	Former Children’s Village, Humbie		13		Development complete.
<b>H33*</b>	Temple Mains, Innerwick		17		Development complete.
<b>H34*</b>	Sites in Musselburgh with Planning Permission		157		Wedderburn House – Development complete. Gracefield Court – Development complete. Bridge Street – Development complete. Millhill – Development complete Brunton Wireworks – Outline permission granted 2008, still current, no full application for housing element yet.
<b>H35*</b>	Marine Hotel, North Berwick		40		Development complete.
<b>H36*</b>	Monkton Gardens, Old Craighall	0.45	11		Development complete.
<b>H37*</b>	Edinburgh Road, Prestonpans	25	600		Part complete, under construction.
<b>H38*</b>	Longdykes, Prestonpans	20	500		Development complete.
<b>H39*</b>	West Windygoul, Tranent	40	800		Development complete.
<b>H40*</b>	Bankpark House, Tranent	1.1			Development complete.
<b>H41*</b>	Barbachlaw, Wallyford	10	266		Development complete.

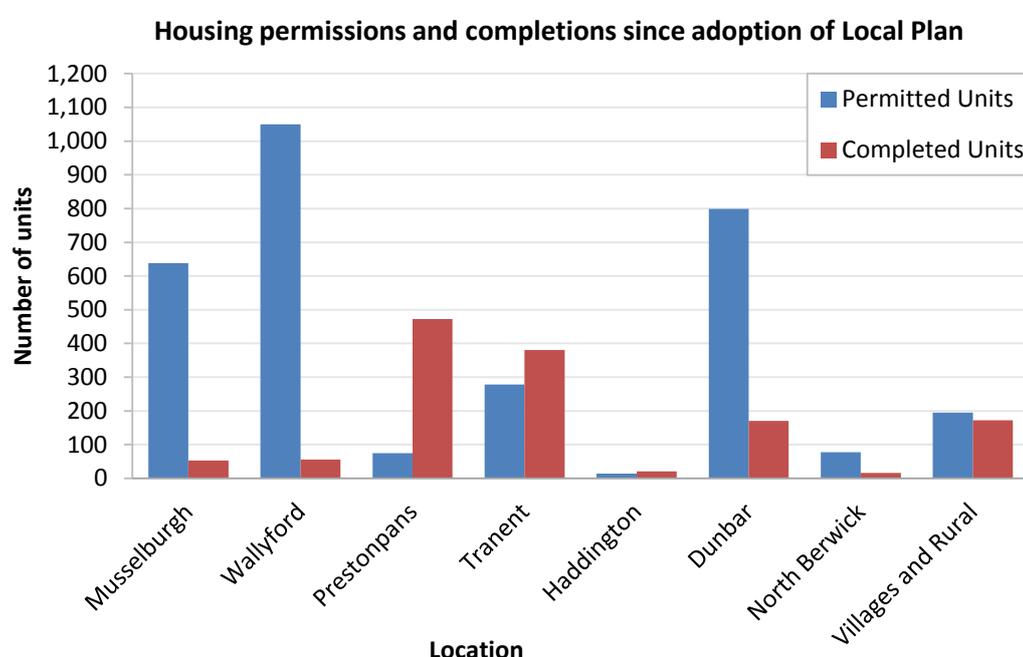
\* Undeveloped housing sites with planning permission, shown in the local plan for information only

**Figure 60: East Lothian Local Plan Housing Allocations**

159. The majority of housing allocations in the current Local Plan have been delivered, however there are a number of allocations where no progress has been made and no planning application has been submitted since the adoption of the Local Plan in 2008. Some of the sites have received no developer interest and, and in other cases planning permission has expired and not been renewed. Consideration will need to be given as to whether these sites can be considered effective and capable of delivery in the LDP period.

## Location of Housing Permissions and Completions

160. The Local Plan has sought to focus new housing development in accessible locations with good access to a range of facilities and services, and locations which make the most efficient use of existing infrastructure or where additional capacity can be provided. It has sought to maximise the use of previously developed land and land allocated for housing and to minimise the impact on prime agricultural land. In allocating and permitting new housing development it has aimed to minimise harmful impacts on landscape character and the character and appearance of existing settlements by promoting housing in appropriate locations where it can be integrated well into existing settlements. The Local Plan has therefore adopted a restrictive policy approach to housing development in the countryside and undeveloped coast.
161. The graph below illustrates the general location of housing completions and permissions since the adoption of the Local Plan and shows that the vast majority of new housing completions and permissions have been focussed in the main settlements and most accessible areas of East Lothian.



*Source: ELC Housing Land Audits 2008-2012*

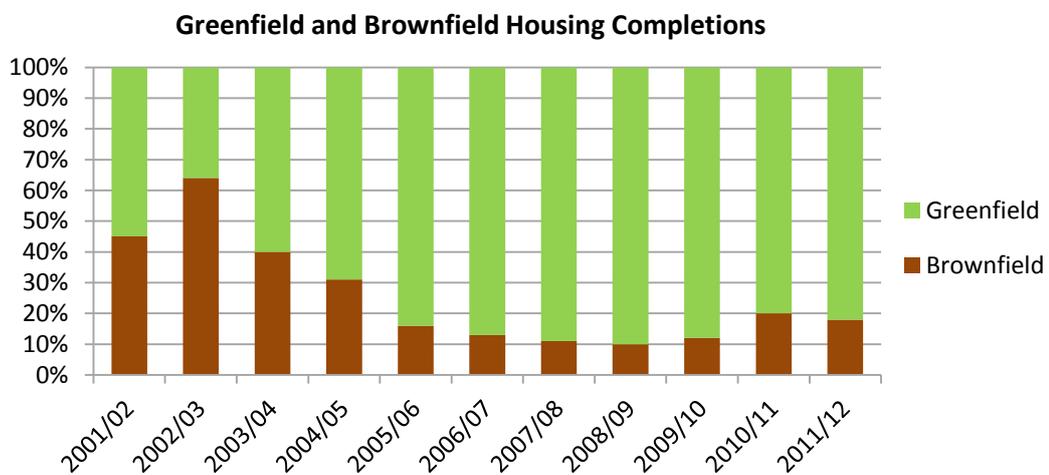
**Figure 61: Housing Permissions and Completions by Location**

162. The graph above illustrates that the largest number of housing completions have been delivered in the towns of Prestonpans and Tranent, accounted for largely by housing delivery on large allocated sites at Edinburgh Road, Prestonpans (Local Plan proposal H37) and West Windygoul, Tranent (Local Plan proposal H39). These are sites that were allocated in previous Local Plans and were able to continue delivering housing completions in challenging economic times as infrastructure had already been made available and financed. Whilst Musselburgh, Wallyford and Dunbar have seen much lower levels of house building since the Local Plan was adopted, significant strategic sites have received planning permission in this period and should start to deliver housing completions.
163. The majority of houses that have been built since the adoption of the Local Plan have been built on sites that were allocated for housing through the current Local Plan or in previous Local Plans. However some houses have been built on sites not identified through the Local Plan, and these are termed 'windfall' sites. These include small sites under 5 units and also other larger sites that have

come forward that weren't allocated, for example redevelopment of urban infill sites where land has become unexpectedly available through for example the present use being discontinued. Since the Local Plan was adopted the proportion of housing completions arising from windfall sites has varied, from a low of 21% in 2012-2013 to a high of 52% in 2009-2010.

Year	2008-09	2009-10	2010-11	2011-12	2012-13	2013-14
<b>Total Completions</b>	343	193	481	433	214	349
<b>Windfall Completions</b>	85	92	181	149	46	128
<b>% Windfall</b>	<b>25%</b>	<b>48%</b>	<b>38%</b>	<b>34%</b>	<b>21%</b>	<b>37%</b>

164. Scottish Planning Policy requires development plans to prioritise the use of previously developed (brownfield) land over greenfield land. There are limited brownfield development opportunities within East Lothian and therefore the vast majority of housing completions have been on greenfield land.



*Source: ELC Housing Land Audits 2008-2012*

**Figure 62: Greenfield and Brownfield Housing Completions**

165. Whilst the Local Plan has adopted a restrictive approach to new housing outwith existing settlements, it is acknowledged that there will be some situations where windfall residential development in the countryside is acceptable for example where new housing is a direct operational requirement of an agricultural, horticultural, forestry or other employment use, or where it results in the re-use and restoration of a traditional building that is worthy of retention, for example through steading conversions. Through Policy DC1: 'Development in the Countryside and Undeveloped Coast', the Local Plan has provided a policy framework to set out the conditions whereby residential development in the countryside is acceptable and includes a range of requirements to ensure that it is sensitively integrated in its rural setting. Further discussion of how the Local Plan has been used to manage residential development in the countryside is included later in the Monitoring Statement.

## Affordable Housing

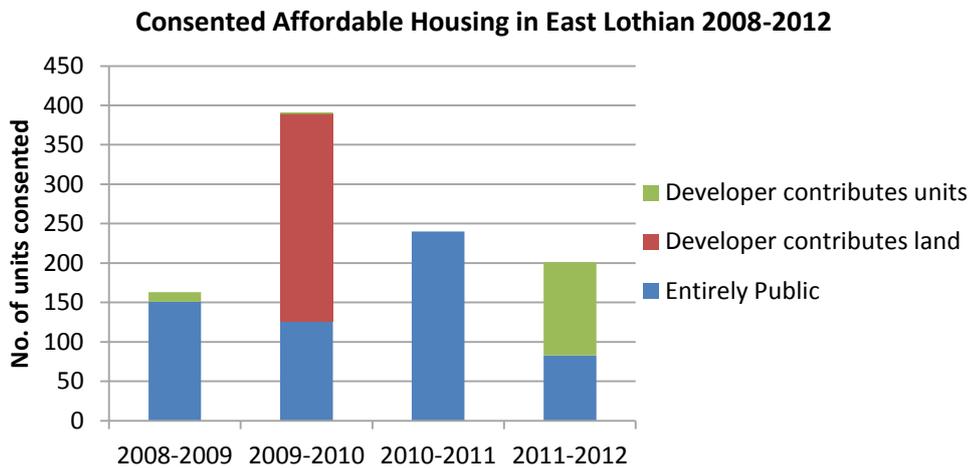
166. Housing affordability remains a key issue in East Lothian, and the planning system has an important role to play in helping secure more affordable homes. The Local Plan requires development proposals of five or more houses to make provision within the scheme for affordable housing. The required proportion of affordable housing is 25% with the exception of Proposal H1 Blindwells (30%) and Proposal H3 Letham Mains (17%).

167. Over 800 affordable houses have been built in the period 2008-2012. A significant proportion of these have been delivered on 100% affordable housing sites delivered by East Lothian Council or housing associations, however the Local Plan has also been successful in securing a proportion of onsite affordable housing provision on a number of private developments over 5 units. Affordable houses are currently being built within the Pinkie Mains housing site in Musselburgh and at the Orchardfield site at East Linton.

Year	2008-09	2009-10	2010-11	2011-12	2012-13	2013-14
<b>Affordable homes completed</b>	116	81	256	240	33	138

Source: NB1 returns by local authorities to the Scottish Government, Communities Analytical Services (Housing Statistics) and Housing Association new build information from Scottish Government Housing Investment Division: Affordable Housing Investment Programme

168. Of the affordable housing granted planning permission since the adoption of the Local Plan the graph below shows that the majority of units were to be delivered through public funding.



Source: Scottish Government Statistical Bulletin: Planning Series: Affordable Housing Securing Planning Consent Survey 2011/12

**Figure 63: Affordable Housing Granted Planning Permission**

## Housing Need and Demand and SESplan Requirement

169. East Lothian's fast growing population has generated significant demand for new housing in the area. A Housing Need and Demand Assessment (HoNDA) was undertaken to inform the South East Scotland Strategic Development Plan (SESPlan) and forecasts the demand for new houses across the SESPlan area, concluding that there is a requirement for 155,545 homes across the area in the period 2009-2032. It calculated a demand for 11,770 new homes in East Lothian over the period, approximately a third of this demand is for affordable homes.

	Years 1 – 5 (2009-2014)	Years 6 - 10 (2015-2019)	Years 11 - 15 (2020-2024)	Years 16 - 20 (2025-2029)	Total Demand 2009 to 2032
<b>East Lothian</b>					
Affordable	197	232	143	122	3,844
Market	282	331	405	360	7,926
<b>TOTAL</b>	<b>479</b>	<b>563</b>	<b>548</b>	<b>482</b>	<b>11,770</b>
<b>SESplan Total</b>					
Affordable	2,381	2,574	1,121	1,183	40,026
Market	5,138	4,873	5,421	4,921	115,518
<b>TOTAL</b>	<b>7,519</b>	<b>7,447</b>	<b>6,542</b>	<b>6,104</b>	<b>155,545</b>

170. SESplan sets a housing requirement for all the authorities within its area for the periods 2009-2019 and 2019-2024. The approved SDP together with the Supplementary Guidance on Housing Land (published for consultation September 2013 and awaiting approval by Ministers) requires the East Lothian LDP to ensure enough land is allocated for the delivery of 6,250 homes in the period 2009-2019 and a further 3,800 homes in the period 2019-2024.

### Housing Land Supply

171. The 2013 Housing Land Audit demonstrates a total established housing land supply of 6,971 dwellings in East Lothian, with an effective supply of 2,357 dwellings programmed to be completed in the five year period 2013-2018.

172. There have been 1,321 completions in the period 2009-2013, therefore the remaining requirement for the period 2013-2019 is 4,929 homes. The graph below illustrates East Lothian’s established housing supply, as programmed in the 2013 Housing Land Audit. It shows the cumulative completions that are forecasted for the SESplan periods 2009-2019 and 2019-24, and illustrates the difference between our committed housing supply, and the total amount of houses that will need to be built to meet the SESplan requirements for these periods. The LDP will need to ensure that it allocates enough land to make up the shortfall between the established land supply, and completions required by SESplan.

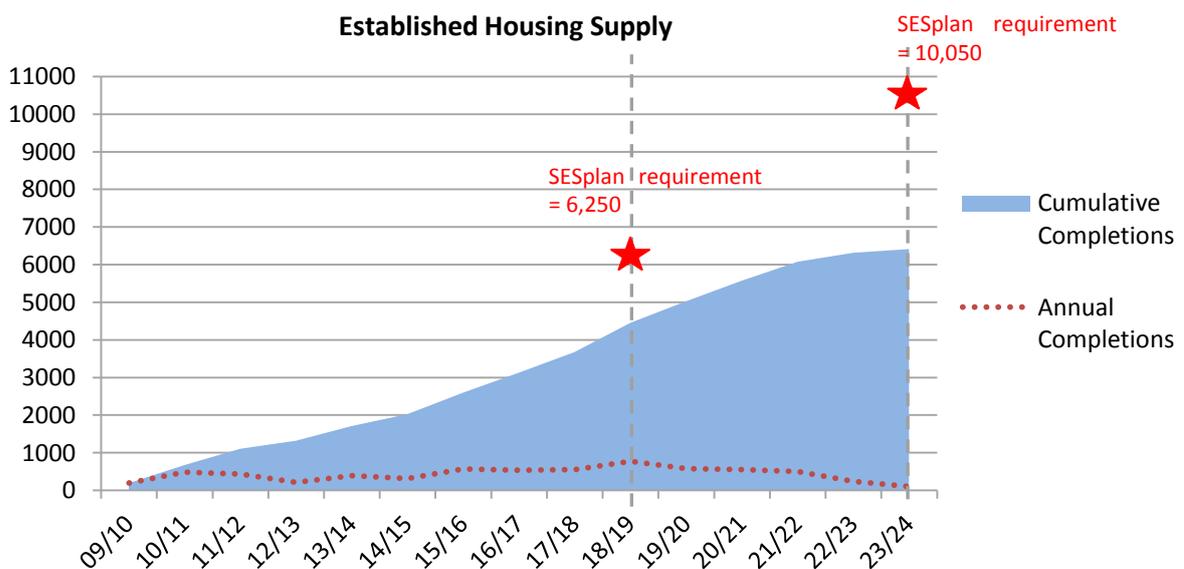


Figure 64: Established Housing Supply against SESplan Requirement

## Key Issues for ELLDP

- Responding to the impact of the economic downturn on the delivery of private housing
- Allocating a generous land supply and ensuring a five year effective supply at all times
- Delivering housing completions on strategic housing sites
- Directing new housing towards sustainable locations
- Delivering sufficient levels of affordable housing and integrating it into private housing sites where possible.

## *Has the Local Plan encouraged new employment development?*

173. The Local Plan has sought to ensure availability of a range of high quality strategic and local sites for business and industry in accessible, sustainable locations. By seeking to ensure an adequate supply of employment land to both retain existing employment and to attract new employment into East Lothian, one of the Local Plan's aims was to reduce the high levels of out commuting from the area.

### Allocated Employment Land

174. Scottish Planning Policy requires planning authorities to ensure that there is a range and choice of marketable sites and locations for businesses allocated in development plans. Marketable land is defined as that which meets business requirements, is serviced or serviceable within 5 years, is accessible by walking, cycling and public transport and has a secure planning status.
175. The Edinburgh and the Lothians Structure Plan required 40 hectares of strategic industrial land to be identified in East Lothian in the period to 2015. The Local Plan identified land to meet this demand in two main locations:
- Musselburgh: land at Craighall between the east coast railway and the A1, and land on the north side of the Old Craighall junction.
  - Blindwells new settlement proposal.
176. The Local Plan also allocated land for employment use through Proposals BUS1 – BUS12 and includes a range of policies (Policy BUS3 – BUS10) to guide development on a range of other existing or proposed employment sites.
177. The table below summarises the extent to which allocated employment sites in the Local Plan have been developed for employment uses.

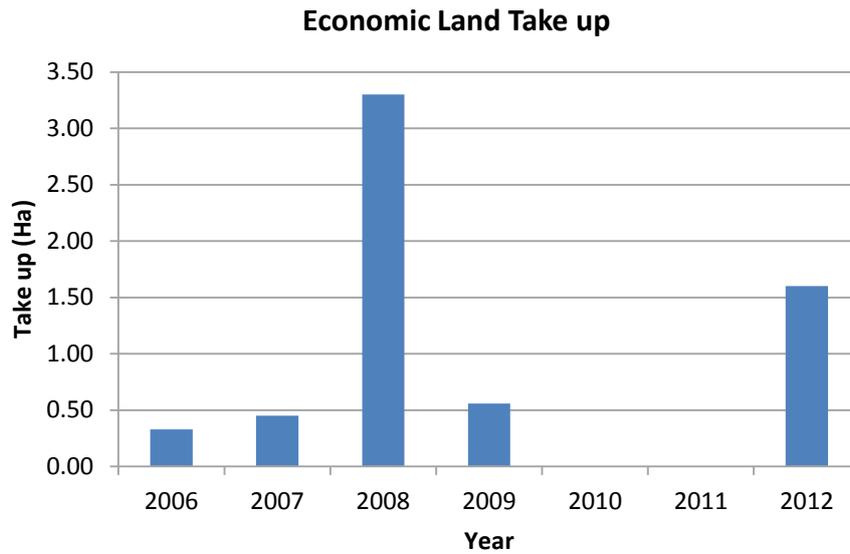
Proposal/Policy	Delivery/Implementation since Local Plan 2008 adoption
<b>Policy BUS4: Bruntons Site, Musselburgh</b> Suitable for range of uses including healthcare, nursing home, day	A mixed use scheme for the whole of the site was granted outline permission in 2008 and the site is now partly developed for a mix of uses as stated in the Local Plan. A Primary Care health centre opened on part of the site in late

centre, specialised housing, retail, Class 4 Business and Class 5 General Industrial.	2012. A replacement larger superstore was completed in 2010 to replace the existing store on the site. An over 55 housing development is almost complete on part of the western Eskmills area of the site. Part of the site remains undeveloped.
<b>Policy BUS5: Olive Bank</b> Suitable for Class 1,2,3,4,5 and 6.	The allocated site was largely occupied by existing business/industrial uses at the time of the adoption of the local Plan. Some areas of the site remain vacant.
<b>Policy BUS6: Kirk Park, Musselburgh</b> Class 4 business uses supported and potentially Class 8 and 10 institutional uses.	A planning application for a care village was submitted in 2009 and determined at Planning Committee in April 2010, however a decision notice was not issued as no Section 75 was agreed.
<b>Policy BUS7: Former Oak Tree Filing Station, Haddington</b> Redevelopment of the site – a range of uses considered acceptable in principle including roadside services, food and drink, hotel, Class 4 Business, residential/non-residential institution, garden centre.	Site remains undeveloped. Detailed planning permission was granted in 2013 for a new Sainsbury's supermarket on the site.
<b>Policy BUS8: Land at Bermaline Maltings, Haddington</b> Business and Industrial uses supported on the site.	Site remains undeveloped. The current owner (Pure Malt Products) does not intend to make the land available for economic development.
<b>Proposal BUS1: Craighall Business Park, Musselburgh</b> Class 4 Business and Class 10 institutional uses.	Site remains undeveloped. Major ownership constraints – site is owned by a house builder and is being promoted for a housing led development with only a small element of mixed use including employment. There are also significant infrastructure constraints with regards highways access and high servicing costs.
<b>Proposal BUS2: Old Craighall Junction, Musselburgh</b> Allocated for Class 4 Business uses.	Site remains undeveloped. Outline planning permission was granted in 2011 for the erection of a business park comprising office accommodation and hotel, but has now lapsed.
<b>Proposal BUS3: Blindwells</b> At least 10 hectares of land for Class 4 and Class 5 uses to be provided.	Site remains undeveloped. An application for planning permission in principle for the mixed use scheme including employment is currently under consideration. It is unlikely any development could be commenced before 2020.
<b>Proposal BUS4: Spott Road Dunbar – Industrial Estate expansion</b> 20.6 hectares allocated for Class 5.	Site is partly developed, but not for Class 5 uses. An Asda supermarket opened on part of the site in late 2007 and pub company Marstons opened a pub/restaurant in 2013 and an adjacent hotel is under construction. Additionally planning permission was granted in 2012 for a photovoltaic panel solar farm on part of the site covering 7.7 hectares.
<b>Proposal BUS5: Alderston, Haddington</b> Allocated for Class 4 business use.	An office building was granted permission in 2006 and has been built.
<b>Proposal BUS6: Gateside, Haddington</b> Allocated for business and	Site remains undeveloped. Planning permission is minded to be granted for mixed residential and Class 4 use. A planning application for a supermarket on the site was refused in 2012.

industrial uses.	
<b>Proposal BUS7: Hospital Road, Haddington</b> Allocated for business/industrial uses.	Site remains undeveloped. The land is currently set aside for potential future expansion of the adjacent factory and therefore unavailable for general business/industrial development.
<b>Proposal BUS8: Macmerry Business Park Extension</b> Allocated for Class 4 business use.	Site has been purchased for possible extension to existing RBS high security site and/or sterilising the area. The site is not therefore available for general Class 4 business use.
<b>Proposal BUS9: Tantallon Road, North Berwick</b> Allocated for business use.	Planning permission granted for western part of site for a Council amenity services depot for storage of materials, equipment and machinery and development completed. Eastern part of allocated site remains undeveloped and available for business use.
<b>Policy BUS10: Mid Road West, Prestonpans</b> 4.5 hectares allocated for business and industry (Class 4,5,6) with recognition that due to ground conditions an element of enabling residential development may be required.	Site remains undeveloped for economic use. Enabling residential development was permitted and is now complete on 3.5 hectares of the 4.5 hectare allocation in order to ensure the delivery of one hectare of serviced employment land, and is the subject of current planning applications for business units.
<b>Proposal BUS11: Kingslaw, Tranent</b> Allocated for business and industry.	Site remains undeveloped. The site is owned by a supermarket chain and is unlikely to be released for business/industrial use. An offer to purchase the land for economic use was declined by the landowner in late 2011.
<b>Policy BUS12: Wallyford – Business Park</b> Allocated for Class 4 business use.	Site remains undeveloped. Site was granted planning permission on appeal for residential development in 2013.

178. The Council's Economic Development team maintains an annual audit of employment land sites and monitors the take up (i.e.. development of sites for employment uses) of sites allocated for employment in the Local Plan and also monitors changes on other existing industrial and employment areas.

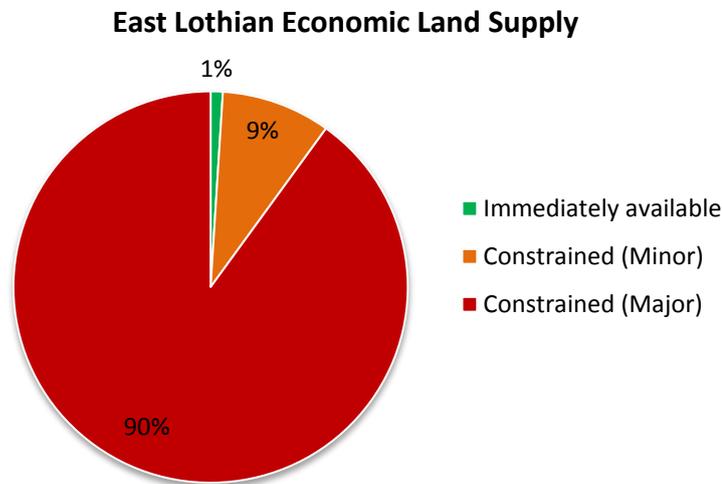
179. The chart below shows the level of employment land take up for the period 2006-2012 (taken from the 2013 employment land audit). The levels of take up have been low and this is largely attributable to the range of constraints affecting the sites which are inhibiting their development.



*Source: East Lothian Economic Land Report 2012 (ELC Economic Development Department)*

**Figure 65: Employment Land Take Up**

180. The Council’s Economic Development team has assessed the marketability of the allocated employment sites in the Local Plan and concluded that of the 100.43 hectares of allocated employment land, 90.43 hectares is subject to major constraints and is not capable of being delivered for economic development within the next 5 years. 9 hectares of the economic land supply are considered to be subject to minor constraints and could become available within the next 5 years and 1 hectare is immediately available (Mid Road Prestonpans).



**Figure 66: Economic Land Supply in East Lothian – Constraints**

181. The key major constraints identified that are inhibiting the delivery of the allocated sites are the high costs of servicing and providing infrastructure for the larger sites, and land ownership issues as a number of the sites are owned/optioned by house builders or supermarket operators and are therefore being promoted for residential/retail uses.

182. Scottish Planning Policy states that new economic development sites should be brought forward where existing allocations do not meet current and anticipated market expectations. Where identified sites are no longer considered appropriate or marketable, they should be reallocated for another use through the development plan.

183. The audit undertaken by the Council's Economic Development team revealed a number of major constraints which are preventing a significant proportion of the allocated economic land supply being developed for their allocated use. In preparing the ELLDP careful consideration will therefore need to be given as to whether these constraints can be overcome and the sites made deliverable for example through mechanisms such as compulsory purchase orders or securing funding to service sites, or whether they should be re-allocated for alternative uses and new marketable employment land be identified and allocated in the ELLDP to maintain an effective supply.

### Protecting Business Land from Loss to Other Uses

184. Policies BUS1 and BUS2 of the Local Plan seek to protect land allocated for business and industry from being developed for other uses in order to ensure that there is an adequate supply of land for business and industry to support economic development.
185. Since the adoption of the Local Plan there have been a number of planning applications for development on allocated employment sites which has not fallen into the use classes specified in the policies and proposals of the Local Plan. The policies have been challenged and in a number of cases, uses other than employment have been allowed, either through the Council's decision making process, or by Reporters if the cases have gone to planning appeals. A number of examples are outlined below and have resulted in the loss of business/employment land to other uses.
- A supermarket was permitted on a site allocated for class 4 (business) and potentially class 6 (storage and distribution) on the edge of Tranent.
  - A supermarket was permitted on a site allocated for classes 4, 5 and 6 (business, general industrial and storage and distribution) at Mid Road in Prestonpans. It was permitted by the Local Review Body as it was demonstrated that redevelopment of the site for employment uses would not be economically viable and unlikely to occur.
  - A solar array farm was permitted on land allocated for business and industry at Spott Road in Dunbar (Proposal BUS4).
  - A supermarket was permitted on the Oak Tree site (Policy BUS7) at Gateside in Haddington.
  - Housing was permitted on land allocated for class 4 business use at Barbachlaw, Wallyford (Proposal BUS12) following an appeal against the Council's refusal of permission.
186. It has proved difficult for the Council, when challenged, to maintain that some of the allocated employment sites are marketable and economically viable for their intended uses when faced with proposals for alternative uses and this has led to an incremental loss of allocated employment land. There have been instances where Policy BUS1 has however been successfully used to resist proposals for developments that were contrary to the Local Plan allocation, for example an application for a supermarket on a site allocated for business/industry at Gateside East, Haddington.

#### Key Issues for ELLDP

- Ensure the ELLDP identifies and allocates a range and choice of marketable and deliverable sites and locations for businesses
- Consider whether any land currently allocated for employment should be re-allocated for other uses

- Support local businesses to expand and stay within East Lothian
- Support rural diversification and appropriate business development in the countryside

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### ***Has the Local Plan carefully controlled the type and location of new development allowed in East Lothian's countryside?***

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#### **New Housing Development in the Countryside**

187. A review of determined planning applications for new build residential development in the countryside, in the first four years following the adoption of the Local Plan, showed that the Local Plan's policy controlling development in the countryside (Policy DC1) has been successfully implemented to control new build residential development. Out of a total of 17 applications, five were withdrawn, eight were refused permission, and four were granted permission. The applications that were permitted successfully demonstrated that the new houses were an operational requirement of an existing agricultural, horticultural, forestry or other employment use and that no other building was available, and therefore satisfied Part 1b of Policy DC1. The Council commissions an Agricultural and Rural Development Consultant to provide specialist advice on such applications to ensure that they can be justified. Policy DC1 has been successful in resisting new build houses where the case for an operational requirement has not been made.
188. Policy DC1 of the Local Plan has been used to resist proposals for new build housing on sites on the edge of settlements but outwith existing settlement boundaries. There has been increasing pressure for housing developments on unallocated sites covered by the DC1 policy, and three sites were allowed on appeal, with other material considerations, such as the shortfall in the 5 year housing supply deemed to outweigh the departure from Local Plan policy regarding development in the countryside. These include land at Dovecot Farm and Hawthornbank on the edges of Haddington and land at Beveridge Row on the edge of Dunbar.

#### **Changes of use/Conversions to Housing in the Countryside**

189. East Lothian Council receives a significant number of applications for residential development in the countryside in the form of conversions of rural buildings, the majority of which are former agricultural steadings which become redundant as farms merge or are no longer fit for purpose for modern agricultural businesses. Since the adoption of the Local Plan 36 planning permissions were granted for the conversion of rural buildings totalling 117 residential units. The conversion of redundant buildings in the countryside to residential use is encouraged by Policy DC1, provided that the building has architectural merit and that it stands substantially intact; i.e. it makes a positive contribution to the countryside and is worth conserving. In addition, guidance in Appendix 2 of the Local Plan, the Farm Steading Design Policy gives further detail on how to adapt an existing farm steading to a new use. The effect of Policy DC1 has therefore been to resist new build housing in the countryside while at the same time encouraging appropriate buildings to be converted to residential use. This has allowed the overall landscape character of the East Lothian countryside to be maintained and enhanced. East Lothian still has many farm and other rural buildings that are in poor condition and which would benefit from conversion to new uses. The Council places a strong emphasis on the design of converted rural buildings to ensure that they continue to look like rural buildings that form part of the countryside rather than like new houses in a rural area.



**Figure 67:** This unlisted former steading near Tranent has been converted to housing use. It has architectural merit and will continue to make a positive contribution to the character and appearance of the East Lothian countryside in its new use.



**Figure 68:** Planning Permissions granted for Residential Conversions in the countryside 2008-14

## New Business Development in the Countryside

190. Local Plan policy directs new business and industrial development towards land allocated for such purposes but Policy DC1 also encourages rural diversification and new business development in the countryside where it is directly related to agriculture, horticulture, forestry or countryside recreation, or is of an appropriate scale and character for its location, can be suitably serviced and accessed and does not have significant traffic or environmental impacts.
191. Since the adoption of the Local Plan there have been 61 business related planning applications in the countryside. Of these 51 were approved and 5 refused. Of the refusals two were mixed use including residential development; one for hot and cold food sale at a location where there was already a similar approval tied to the recreational business at that location and one for a new build

chicken shed development refused on environmental grounds. A refusal for the change of use of a hotel to a house was subsequently approved on appeal.



Figure 69: Planning Permissions granted for Business Development in the Countryside 2008-14

192. Businesses approved in the countryside include a hotel, equestrian businesses, class 4 and 6 uses, leisure and recreation businesses; holiday accommodation; farm shops; agricultural machine workshop and sales; cook school; allotments; cattery; offices; wellness centre and cafe; blacksmiths and visitor centre with cafe. These uses have all been permitted within the terms of policy DC1. The majority of applications refused in the countryside have been for new houses or applications associated with existing houses and applications for wind turbines.



Figure 70: Rural buildings at Prora converted to wellness centre, offices and cafe

193. Existing buildings in the countryside can also be converted to new business uses. Unlike conversions to residential use, there is no restriction on the type of building that can be adapted or converted to business use though the policy requirement that it must be of a scale and character appropriate to its location remains. Policy DC1 has therefore supported economic development in

the countryside in allowing business development of an appropriate scale and character for its rural location. Examples of conversions to business use in the countryside include the creation of a farm shop and cafe from a redundant bothy building at Gosford; the conversion of the steading at Prora to offices and a wellness private health facility. The Council also approved the conversion of the listed steading at Phantassie to a retail and leisure development.

## Development in the Green Belt

194. Within western East Lothian an area of the Edinburgh Green Belt surrounds Musselburgh and Wallyford and extends towards Prestonpans and Tranent. This area of Green Belt is strongly protected from development by the policies of the development plan, specifically by Policy ENV2 of the Edinburgh and the Lothians Structure Plan 2015 until it was replaced by SESplan in June 2013 (which includes Policy 12 – Green Belts), and Policy DC2 of the East Lothian Local Plan.
195. Policy ENV2 of the Structure Plan contained a presumption against development or changes of use in the Green Belt unless necessary for the purposes of agriculture, horticulture, forestry, countryside recreation or other uses appropriate to the rural character of the area. Policy DC2 of the Local Plan only permits development in the Green Belt where it is necessary for agricultural, horticultural or forestry operations, for countryside recreation, or where by its scale and nature it will not harm the rural character of the area, and where it meets the criteria of Policy DC1 and where it does not detract from the landscape setting of Edinburgh and its neighbouring towns, or lead to their coalescence.

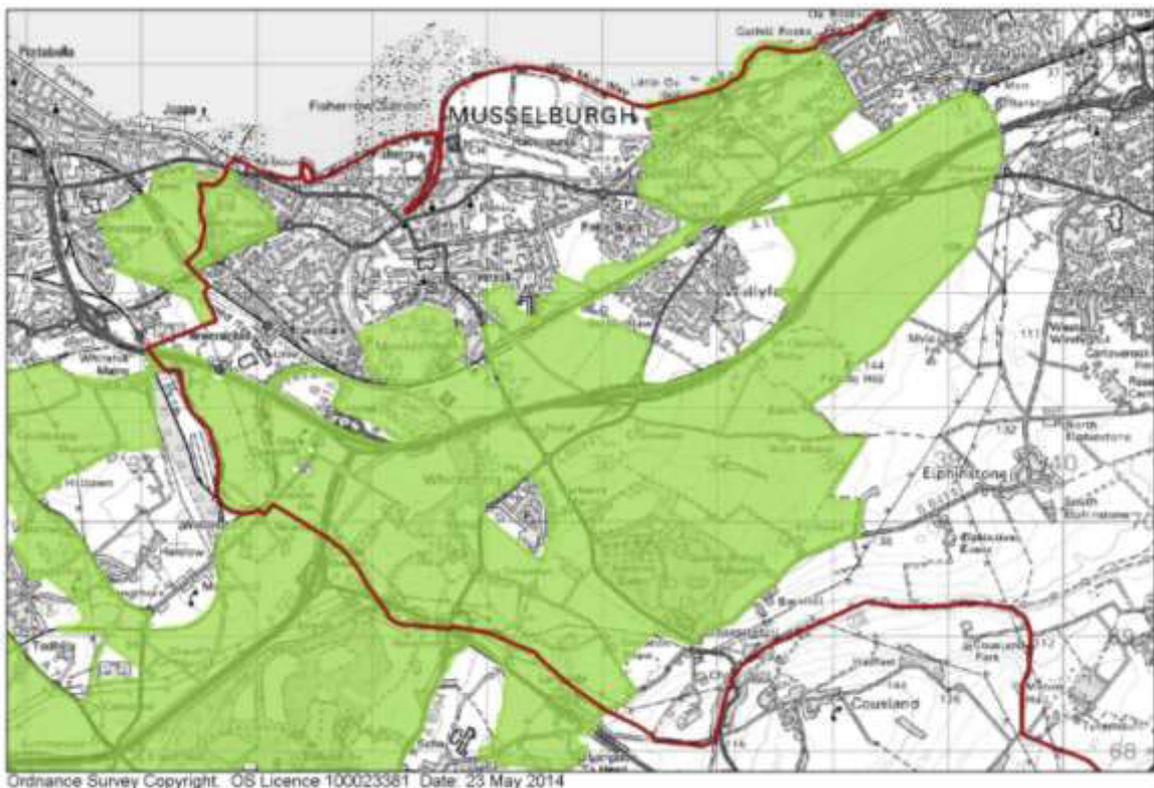


Figure 71: Green Belt Extent

196. The land around settlements in the west of East Lothian is under significant development pressure, with the settlements of Musselburgh and Wallyford having been identified as Core Development Areas in the Structure Plan. In order to accommodate the strategic development needs of these areas, the Local Plan modified the Green Belt boundaries to allocate land for the following: housing

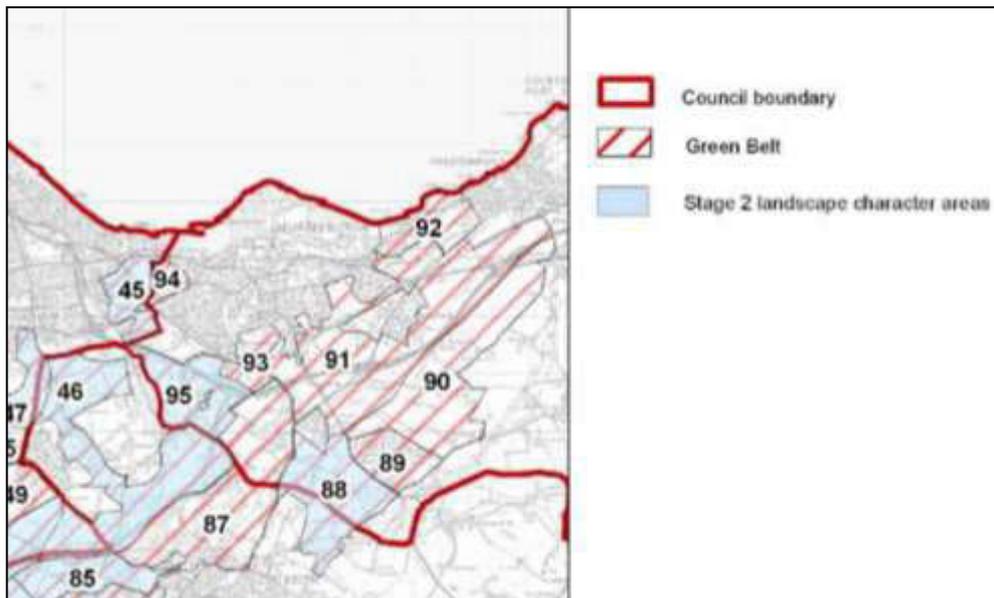
development at Pinkie Mains, Musselburgh and around the south and east sides of Wallyford; and land for employment uses at Craighall, adjacent to Queen Margaret University College. The only development that has commenced on these areas removed from the Green Belt as yet is the housing development at Pinkie Mains which commenced in 2012.

197. The Local Plan has generally been successful in managing development in the Green Belt to ensure that its function and objectives are not compromised. The majority of planning applications permitted in the Green Belt since the adoption of the Local Plan have been for minor alterations and extensions to existing development and also there have been a small number of conversions of rural buildings to form houses. Additionally tourist related development of timber lodges and an amenity building at the existing Drummohr caravan park has been permitted as it was consistent with local and strategic Green Belt policies.
198. The Local Plan Green Belt policy has been used to successfully manage new residential development in the Green Belt, having been used to refuse an application for a new house where it could not be demonstrated it was an operational requirement, and conversely to support a new house where it was demonstrated that it was required to support a farming business.
199. There have been two applications determined for wind turbines within the Green Belt, with one being approved as it was considered to respect the landscape setting of the Green Belt due to its appropriate scale, whilst one was refused as it was considered contrary to Policy DC2 due to its landscape impact and resultant harmful impact upon the Green Belt.
200. It is considered that the Local Plan's approach to managing development in the Green Belt through Policy DC2 and DC1 has struck the right balance in allowing development of an appropriate scale and nature and development that is required to support the rural economy, whilst preventing inappropriate development that would harm the integrity of the Green Belt and its main purposes.
201. Pressure for future development in the Green Belt remains with a planning application recently submitted for up to 1200 houses in the Green belt at Goshen Farm and interest in a mixed use scheme on land included in the Green Belt at Old Craighall. The LDP will need to consider whether the current Green Belt boundaries should be maintained to restrict the further expansion of settlements within it or whether there is justification for modifications to the boundaries to accommodate strategic development requirements, as was the case with the current Local Plan.
202. The Edinburgh Green Belt Study (December 2008)<sup>25</sup> provides an independent, landscape-based review of the Green Belt to assess the importance of areas of Green Belt land to the maintenance of Green Belt objectives. The aim of this study was to identify those areas which contributed most to Green Belt objectives when assessed against Green Belt objectives 2) and 3) of SPP21, which have now been carried forward into SPP at paragraph 159. These objectives are:
  - To protect and enhance the character, landscape setting and identity of towns and cities; and
  - To protect and give access to open space within and around towns and cities as part of the wider structure of green space.
203. As well as identifying those areas that are most important to the maintenance of these objectives, the study also sought to identify any areas that are less critical to them and that may, as a result, offer the potential to accommodate long term planned growth. To do this the study identified 95 separate Landscape Character Areas (LCAs).

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<sup>25</sup> Edinburgh Green Belt Study, Final Report, Land Use Consultants in association with Carol Anderson, December 2008

204. The study was split into two parts. Stage 1 assessed the contribution of the LCAs to Green Belt objectives and gives each a score to measure the importance of the land to maintaining these objectives. A score of 67% or below for both objectives meant that the LCA would be taken forward into Stage 2 of the assessment, which would investigate further if any of these LCA contribute less to Green Belt objectives and may present opportunities to accommodate long term planned growth. The study identified two areas in East Lothian that contributed to a lesser extent to Green Belt objectives (Landscapes character Areas 95 and 98) around Craighall and to the south of Whitecraig. The LDP will need to consider whether any revisions to the Green Belt boundary are required to accommodate development needs and whether they can be justified based on available evidence, namely the 2008 Green Belt Study.



Source: Edinburgh Green Belt Study Stage 1 (Land Use Consultants in association with Carol Anderson)

### Key Issues for ELLDP

- Continue to ensure that effective policies are in place to assess proposals for development in the countryside that support appropriate development and rural diversification and prevent inappropriate development that would harm the rural character of the countryside
- Consider whether any modifications to the current Green Belt are required
- Continue to ensure that policies are in place which effectively manage development in the Green Belt and prevent inappropriate development from taking place that would undermine Green Belt objectives

## *Has the Local Plan helped reduce dependence on the private car and encouraged travel by public transport?*

### Transport and Accessibility

205. The Local Plan seeks to ensure that new development reduces the impact of the private car and maximises opportunities to use public transport. It includes a range of transportation policies and proposals for specific projects, and these are listed in the table below along with commentary as to whether they have been implemented since the adoption of the Plan.

Policy/Proposal	Progress/Implementation since adoption of Local Plan
<b>Proposal T1: Whitecraig Bus Turning Circle</b> Safeguarded land for a potential bus turning circle.	Implemented.
<b>Policy T3: Dunbar Railway Station</b> Support for improvements to the station including more parking and better pedestrian access.	A bid is being developed at present to develop a transport interchange at the station.
<b>Policy T2: Safeguarding of land for station car parks</b> Safeguarded land adjacent to Prestonpans, Longniddry, Musselburgh and Drem stations for additional car parking.	Additional parking provision has been provided on the areas of safeguarded land at Prestonpans and Musselburgh station. The Council is seeking to secure funding to provide additional spaces at Longniddry and Drem stations.
<b>Proposal T3: Wallyford Park and Choose Facility</b> Land removed from Green Belt and safeguarded for a Park and Choose facility.	The Park and Choose facility opened in 2008.
<b>Policy T4: Longniddry – Haddington Route safeguarded</b> Route of former railway safeguarded for future public transport use and to be retained in use as a cycle-walkway route during the Local Plan period.	A consultant was engaged to undertake a study of the route and its potential as an active travel route.
<b>Proposal T4: Railway Station Safeguarding at East Linton</b> Land capable of accommodating a new railway station, car park and access is safeguarded.	The Council is still supportive of a station at East Linton. A study has been undertaken and a bid for funding is being progressed.
<b>Proposal T5: Safeguarding of Land for Musselburgh “Parkway” Station</b> 3ha of land safeguarded for a “parkway” station and associated car parking, public transport facilities and access road in an area incorporating the existing rail station.	No change.
<b>Policy T6: A1 Trunk Road: Roadside Facilities</b> Permits a maximum of two additional roadside facilities developments along the A1 corridor in the following sections: Oak Tree Junction – Abbotsview Junction and Thistly Cross –	A supermarket and filling station proposal was granted planning permission at the Oak Tree junction in Haddington. A supermarket and pub developments have been built at the Spott Road junction in Dunbar, and there is consent for a

Broxburn Junction.	hotel.
<b>Proposal T6: Pedestrianisation of High Street, North Berwick</b> Support for the principle of the scheme and commitment to an experimental scheme.	A month's trial was undertaken in 2011 in which traffic data was collected.
<b>Proposal T7: Gardeners Garden Car Park Extension, North Berwick</b> Support for car park to be extended	Car park extension completed. A North Berwick Parking Appraisal was commissioned in 2011 and highlighted a number of issues regarding parking provision in the town and its findings are being considered by the Council.

206. The Local Plan seeks to ensure that new development is delivered in accessible locations and can be accessed safely and conveniently by public transport, on foot, by cycle and private vehicle (Policy T1).
207. The Local Plan has ensured almost all new residential development has been directed to the most accessible locations, by its allocation of sites for development within and on the edge of East Lothian's main settlements so that they can be accessed by a range of transport modes and facilities and services are nearby. Most new homes built over the Local Plan period were on allocated sites including Pinkie Mains, Gilsland, Lochend Hallhill and Muirpark.
208. The Local Plan stipulates that cycle parking will be provided in accordance with the Council's cycle parking standards. This has resulted in additional cycle parking in new developments.
209. The Council has been implementing Safer Routes to School across East Lothian. Measures have included a pilot study in Haddington closing off roads to general traffic at school opening and closing times, and in East Linton some new paths have been installed to improve access to the school. In Dunbar, access to the new primary school at Lochend was designed with the aim of deterring pupil drop off by car, including creating new path links in new residential areas to meet with existing paths to school. Figure 72 shows the mode of travel to school by East Lothian pupils.

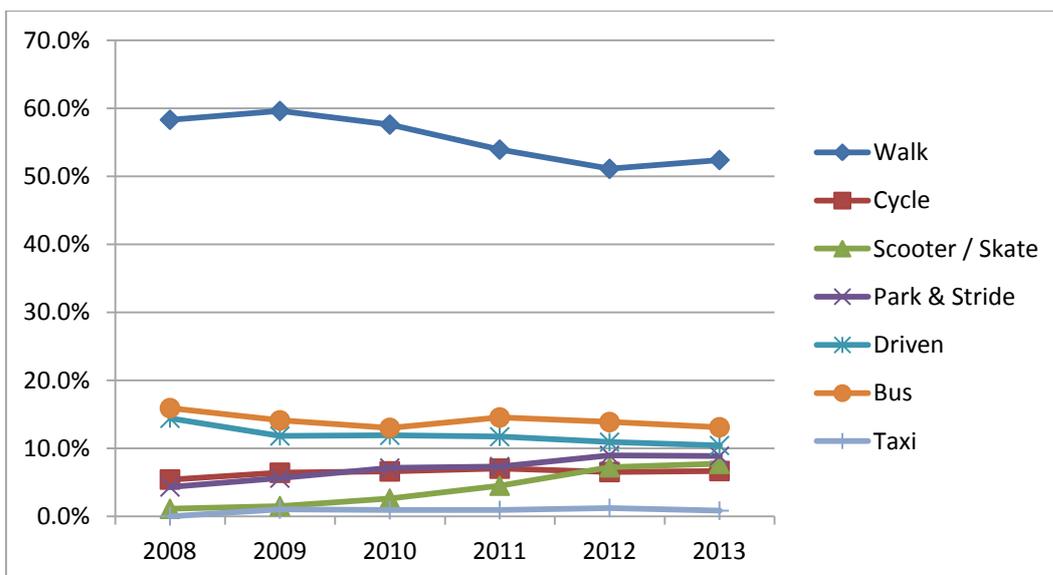


Figure 72: Mode of travel to East Lothian Schools, 'Hands up' survey 2013

210. Where appropriate, improvements to public transport have been sought through the determination of planning applications. Examples include bus shelter infrastructure and ensuring that new housing layouts are designed to accommodate bus services where this is appropriate.

## Key Issues for ELLDP

- Promoting developments in locations that have good access to public transport infrastructure.
- Identifying opportunities for further improvements and projects to encourage public transport usage.
- New development should be designed to encourage walking and cycling

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## *Has the Local Plan helped ensure high quality design in new development?*

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### Residential Layout and Design

211. The design policies of the Local Plan coupled with Supplementary Planning Guidance 3, Design Standards for New Housing Areas prepared by East Lothian Council in 2008 have sought to improve the design standards of new residential development. Broadly, a more efficient use of land is now required, increasing average housing density per hectare and minimising the visual impact of the car. Housing areas are required to be designed to fit the local context of the site. This allows for a greater range and mix of housing types and, as a result of Policy H4 Affordable Housing, tenure of housing on a development site. For the six strategic sites, Pinkie Mains, Wallyford, Blindwells, Letham Mains, Hallhill South West and Mains Farm, detailed Development Frameworks were prepared to guide masterplans with development guidelines prepared for local sites.
212. The slowdown in house building between 2008 and 2013 has meant that fewer examples of new housing developments influenced by the design policies of the Local Plan exist. Much of the housing activity during that period was by the affordable sector and included developments at Muirpark in Tranent, Greenmill Brae at Macmerry and Law View in North Berwick. Many of the design principles required by the new guidance were included in these developments including orientation of housing outwards on to prominent routes, incorporation and overlooking of open space and home zone layouts designed to reduce vehicle speeds by design rather than retrofitting of speed reduction measures.
213. Local Plan Policy DP3 Housing Density requires new strategic housing sites to achieve a minimum average density of 30 dwellings per hectare (net) by using a range of densities, house types and sizes. On other local sites, whilst the target density remains 30 dwellings per hectare lower densities are permitted if they more appropriately reflect local townscape and landscape character. The aim of the density policy is to ensure an efficient use of land and to influence the design of housing layouts to ensure that a range and mix of housing is achieved on the site. Applying this policy to some of the allocated strategic housing sites has proved problematic, as the stated maximum capacities for the sites in the Local Plan has not been consistently aligned with the average minimum density requirement. Because the developable areas within larger sites were not always known, in some cases this resulted in more developable land coming forward than anticipated. To ensure efficient use of land, particularly within main settlements, sites such as Pinkie Mains and Wallyford were able to accommodate more houses than originally allocated. At Pinkie Mains this was resolved by masterplanning the site for an acceptable and efficient housing layout, allowing for further allocation of housing to be made within the site in the ELLDP. Some developments such as Gilsland in North Berwick were approved with a lower density than the

policy requirement. At the local housing site at Orchardfield, East Linton where the size of the site theoretically allowed houses to be provided on generous plots the design requirements of the approved development brief ensured a well designed layout that includes home zone roads, some rear parking courts, a range of different house types and a large area of open space that also accommodates the structural landscape planting as well as a sustainable urban drainage system (SUDs) for the site.

214. Of the strategic site allocations development at Pinkie Mains in Musselburgh and at Gilsland at North Berwick commenced on site with Wallyford, Hallhill South West and Mains Farm having residential layouts approved. A mix of 413 houses and 60 flats were approved at Pinkie Mains within which lower density development will be to the north and higher density development was directed to the south of the site, close to the main road, school and public transport routes. It is also closer to the town centre and the former farm shop was reprovided in a new unit at the south east corner of the site. Travel within the site is designed to provide easy pedestrian access to the south east corner and towards paths that lead to Wallyford station.
215. The following short case studies provide other examples of where the Local Plan and the Design Standards for New Housing Areas have positively influenced the design of developments:

#### *Orchardfield East Linton*

216. Orchardfield is a 50 house development at East Linton allocated as a local housing site in a rural village in the Local Plan. The development of the site was also required to deliver a road access to land reserved for a potential new rail halt at East Linton. It includes 25% affordable houses in line with planning policy and construction should complete in 2015. A development brief was prepared by East Lothian Council and highlighted the importance of the landscape setting of East Linton, a low-lying village surrounded by rising land. To set the site within its landscape context on the lower slopes of Pencraig Hill, the western site boundary was set at an appropriate contour level to ensure that new development did not disrupt long distance views of the village and beyond from the main approach to the village on the A199. The height of houses was carefully considered with the positioning of some bungalows on slightly higher parts of the site to reduce the visual impact of houses on the approach to the village and to help integrate the new houses into this part of the village which is typically small single storey cottages and houses.



217. Within the site, houses are orientated to allow views out to local landmarks Traprain Law and the distinctive former auction mart. Surface water drains to a SUDS pond and the site is well connected to the local path network. Bespoke designed housing was not required but houses had to be laid out to encourage walking and to slow vehicle speeds by design. Links to local path networks were provided and an existing path under the railway line improved to encourage walking to the school and village centre. Some rear parking courts were included to reduce the visual impact of vehicles and a large area of open space provides an outlook for many houses as well as opportunities for play and structural landscaping to improve the landscape setting of the site and the village. Dark coloured roofs and coloured walls allow the new development to integrate with the existing townscape in long distance views of the village. A sense of welcome to the new development is

provided by the orientation of new houses linking with the existing houses with which they share an access.

#### ***Lochend Hallhill Dunbar***

218. Hallhill to the south of Dunbar has been the focus of Dunbar's expansion since 2001. A site identified in the Local Plan for 130 houses is being built out by Taylor Wimpey and was the first at Hallhill to be designed following the Council's Design Standards in New Housing Areas and the 2008 planning policies. This part of Hallhill differs from the housing constructed since 2001 in that the housing layout provides a range of different forms of housing including terraced houses and flats as well as detached and semi-detached houses. The road layout includes home zone areas designed to reduce vehicle speeds and the visual impact of the car is reduced by the provision of rear parking courts that allow houses to be positioned forward in their plots narrowing the width of the streets. Two areas of open space are overlooked by houses and provide play opportunities. Links to path networks in the area are provided designed to encourage walking and cycling to access the town centre and local schools. The houses link with existing houses to provide a permeable layout without culs-de-sac for ease of movement. A SUDs pond will hold and slowly release surface water from the development. The backdrop to the development is Lochend Woods.



219. Planning policies introduced in the Local Plan have positively influenced the design of this development in contrast to the design of earlier phases of housing at Hallhill. The net density of development is approximately 30 dwellings per hectare compared with approximately 20 dwellings per hectare on earlier residential sites at Hallhill. This has allowed a wider range of different house types. Streets are closer together creating a more intimate feel to the development and the visual impact of the car is reduced. There are larger areas of public open space with improved play opportunities and better connections to the path networks (including those planned with other proposed development), than in earlier housing phases.

#### ***Law View North Berwick***

220. Law View has been designed to accommodate 44 affordable houses for East Lothian Council and was allocated in the Local Plan. The houses are designed to accommodate a home zone layout where vehicle speeds are limited by design. This has resulted in houses being orientated in such a way as to create pinch points in the road layout that require vehicles to slow their speed. The houses are of contemporary design and are designed to take advantage of the views of the Law. Children's play space is incorporated in the development.



221. Planning policies introduced in the Local Plan and in the Design Standards for New Housing Areas have positively influenced the design of this development. The density of development is approximately 30 dwellings per hectare in line with planning policy and higher than the average density for new developments prior to the adoption of the Local Plan. This allows for a greater range of house types. Streets are closer together creating a more intimate feel to the development and encouraging social interaction. The visual impact of the car is reduced by landscaping and boundary walling in line with the Design Standards for New Housing Areas.

### Key Issues for ELLDP

- Whether to retain housing density requirement for strategic sites at 30 dwellings per hectare (net) or to increase it to a higher target level to continue to use land efficiently
- Continue to apply the guidance 'Design Standards for New Housing Areas' to influence residential layouts

### *Has the Local Plan safeguarded the vitality and viability of East Lothian's town centres, village centres and local shopping facilities?*

222. The Local Plan seeks to protect and enhance the vitality and viability of East Lothian's town and village centres, and recognises the challenges in doing so given the draw of Edinburgh city centre and the various large scale retail parks surrounding the city, including The Fort Kinnaird Retail Park close to the East Lothian boundary. The Local Plan also seeks to protect access to shops in areas with limited provision.

### Focusing New Retail Development in the Right Locations

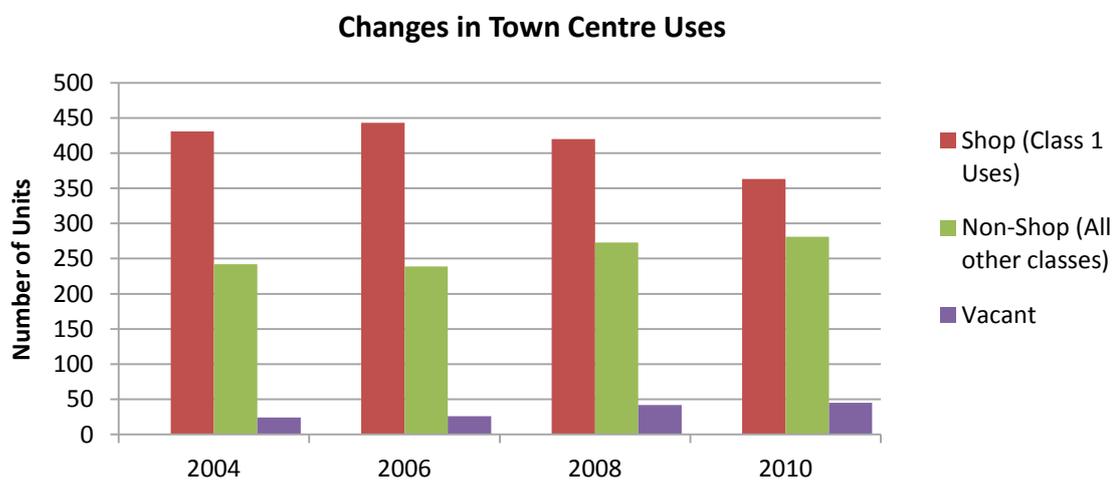
223. As set out in national and strategic level policy the Local Plan adopts a sequential approach to new retail development, requiring new development in the first instance to be located on a town centre site or, where a suitable site or premises is not reasonably available, on the edge of a town centre site or one sufficiently close to form an effective extension to the centre or, where such sites are not reasonably available, elsewhere within an existing or planned urban area. Since the adoption of the Local Plan the following larger retail planning applications have been approved:

- Supermarket, Mall Avenue, Musselburgh – 24 hour supermarket replacing a smaller supermarket on adjacent site. Located on edge of town centre. Conditional planning permission granted by East Lothian Council. Opened 2010.
- High order niche retail and tourism development for the reuse of the listed former steading at Phantassie East Linton (2878 sqm). Located in the countryside but on edge of East Linton village. Conditional planning permission granted by East Lothian Council. Not implemented.
- Garden Centre, Spott Road, Dunbar (1911 sqm retail floorspace). Located out of Dunbar town centre. Granted on appeal following refusal by East Lothian Council. Opened July 2013.
- Supermarket, Gateside, Haddington (2355 sqm retail floorspace). Located out of Haddington town centre. Conditional planning permission granted by East Lothian Council. Not implemented.

- Supermarket, Mid Road, Prestonpans (1208 sqm). Located out of Prestonpans town centre. Granted on appeal by Local Review Body. Not implemented.
- Supermarket, Haddington Road Tranent (1250 sqm). Located on a brownfield site midway between the town centre and the edge of the town. Condition planning permission granted July 2013. Not implemented.

## Managing Change within Town Centres

224. The Local Plan seeks to protect and enhance the vitality and viability of the area's town centres. It resists changes of use from retail to non retail in town centres and established shopping locations through Policy ENV2 unless it can be demonstrated that a retail use is no longer viable or the benefits of the proposed use outweigh the loss of the retail use. The purpose of this policy is to protect retail units within town centres and avoid their change of use to other non retail town centre uses. At the time that the policy was conceived, town centre occupancy rates were relatively high and in some towns retailers seeking to establish a presence were unable to find suitable premises from which to trade. Since the adoption of the Local Plan, retailing has suffered from wider economic factors including the recession and is on a downward trend in terms of representation in East Lothian's towns (Fig.65). To maintain the vitality of town centres it is better for a former shop to be trading as, say, a Class 3 coffee shop than the unit to lie empty awaiting another retail use.
225. The graph below illustrates that the proportion of retail uses within East Lothian's town centres has been decreasing whilst the proportion of non-retail and vacant units has been increasing.



*Source: ELC Retail Survey data*

**Figure 73: Changes in Town Centre Uses**

226. Since the adoption of the Local Plan there have been over 25 applications for change of use from retail to other uses within East Lothian's town centres, most commonly to cafe/restaurant and hot food takeaway use but also including to office, services and leisure use. Two public houses have also changed to retail use in the period. Policy ENV2 was used to require applicants to provide evidence that a retail unit has been suitably marketed for retail use and that no reasonable offers have been received, to demonstrate that a retail use for the unit is no longer viable. In cases where

this evidence has been satisfactorily provided the Council has allowed such changes of use. In one instance where evidence was not provided the application was refused.

227. Pedestrian footfall in the six main town centres is measured annually by an independent private company on behalf of East Lothian Council. Since the measures began in 2008 footfall the trend has been an overall one of decline by around 18% despite the general rise in population in East Lothian.

### Protection of Local Shops

228. Local Plan Policy R2 provides that the change of use of a shop in a village, remoter rural area or other area with limited shopping provision will not be permitted unless adequate attempts have been made to sell it as a shop. No such applications have been received over the plan period.

### Enhancing the Vitality and Viability of Town Centres

229. To address specific town centres the Local Plan proposed that Town Centre Strategies would be prepared for the six main town centres. Strategies have been prepared and are in the process of being implemented for Haddington Town Centre (approved in March 2010) and Musselburgh town centre (approved December 2013).
230. Haddington town centre strategy has a 25 point Action Plan aiming to develop a broader range of attractions, to repair buildings and improve public spaces, to improve movement and access within the town centre, improve services for visitors, encourage new commercial space, and manage the town centre including events, monitoring performance and developing the capacity of local groups. Many of its actions have now been implemented including improvements to traffic flow, repair and enhancement of historic buildings and public realm improvements, the opening of the John Gray Centre as a new attraction to the town centre and some new commercial space has been created in Lodge Street.
231. Musselburgh town centre strategy has a 24 point Action Plan aiming to improve its marketing and promotion, encourage the reuse of vacant floorspace above shops, review path links and signage to the town centre, encourage events, review car park waiting times, encourage new services for visitors, make improvements to the quality of the built environment and public realm throughout the town centre, prepare shop signage guidance to improve the quality of shop frontages and signage, and generally to improve the attractiveness of Musselburgh town centre as a place to do visit and undertake business.

#### Key Issues for ELLDP

- Address falling footfall in town centres
- Encourage new retail development towards town centres, followed by edge of centre locations before considering other locations
- Need to retain basic commercial services including shops in areas with limited provision such as villages
- Review the need for protection of retail units or whether to permit changes of use to other town centre uses more readily to ensure continued vitality.

- Ensure local strategies are prepared and implemented to maintain the vitality and viability of the six main town centres.

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## ***Has the Local Plan helped to protect and enhance the quality of the natural and built environment?***

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### **Built and Historic Environment**

232. The Local Plan seeks to protect and enhance East Lothian's historic assets by resisting inappropriate development which would adversely affect historic features whilst permitting beneficial development and encouraging it to preserve and enhance the historic environment where possible.
233. Appendix 7 of the Local Plan contains short summary Character Statements for each of East Lothian's 30 Conservation Areas. The Local Plan states that in time, more detailed conservation area character appraisals will be undertaken for each of the Conservation Areas. In practice these will also incorporate management plans. Since the adoption of the Local Plan a character appraisal for Inveresk Conservation Area has been completed and an appraisal and management plan for Haddington Conservation Area is in preparation. Character statements are regularly referred to in the determination of planning applications and in appeals against refusal of planning permission. East Lothian is an area rich in architectural built heritage with 2700 property addresses being in statutorily listed buildings. Approximately 18% of properties in East Lothian are covered by either a listed building designation or are located in a designated conservation area. From time to time regeneration programmes focus on conservation area repair and improvement programmes. Since the Local plan, the central part of Haddington Conservation Area has benefited from a Historic Scotland Conservation Area Regeneration Scheme which has resulted in significant enhancement of the buildings and spaces in the town centre.
234. Listed building review is the responsibility of Historic Scotland which does not currently undertake parish or burgh resurveys instead concentrating on thematic reviews and individual request to review listed buildings or those that have potential to be designated as a listed building.
235. The Buildings at Risk register for Scotland brings many of East Lothian's heritage buildings that are at risk to the attention of would-be restorers. The register is added to when new buildings at risk are identified and buildings are removed from the list when restored, or in the event of their demolition. Examples of buildings that have been repaired and restored within the last five years include the former Templar Lodge Hotel in Gullane and Cheylesmore Lodge in North Berwick.
236. The Local Plan also set out proposals for revised Article 4 directions in the Conservation Areas Article 4 Directions remove permitted development rights for certain types of development that can usually be undertaken without the need for planning permission, in order to protect the character of Conservation Areas being harmed by small, but when considered cumulatively, significant harmful changes. However, since then changes to the General Permitted Development Order have been made which remove the need for an Article 4 Direction in respect of alterations to domestic property. In addition consultation was undertaken by Scottish Government on changes to non-domestic classes of development in the GPDO but this has not yet been finalised. The Article 4 Directions in place at the time of the adoption of the Local Plan remain in force and review of these awaits the changes to be made to the non-domestic classes of development before the Article 4 Directions will be updated and reviewed by the Council.

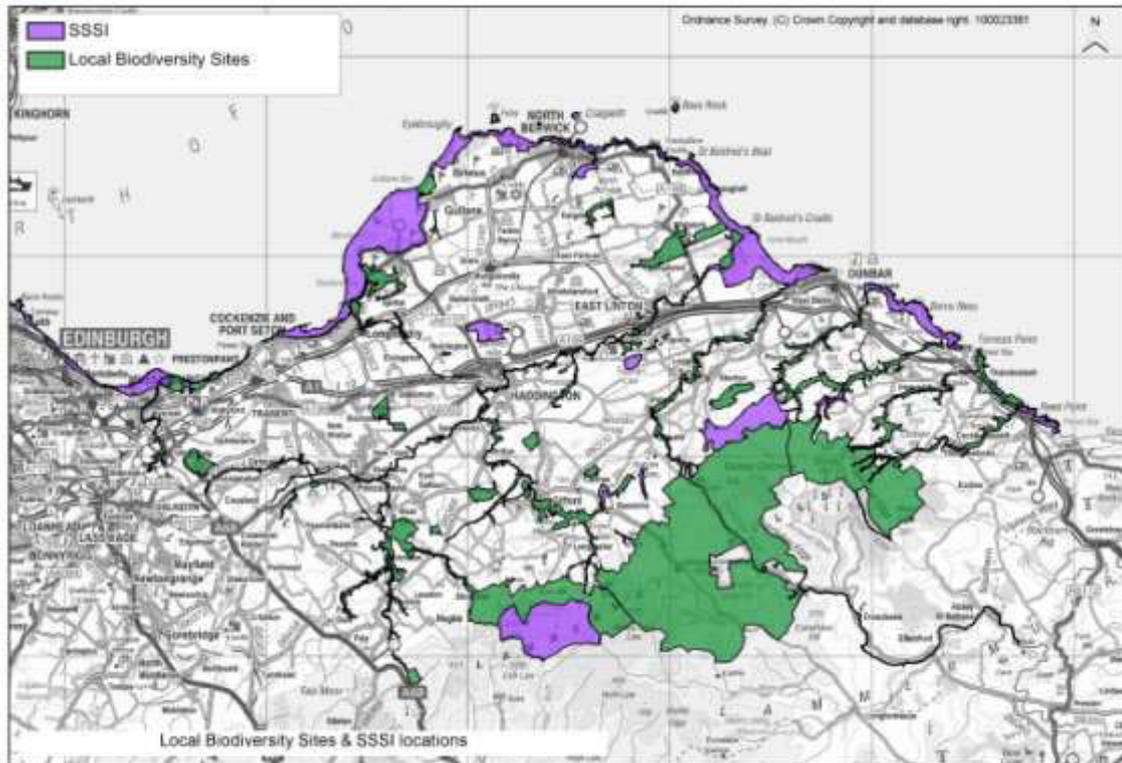
## Natural Heritage

237. The Local Plan seeks to ensure that the natural heritage is not adversely affected by new development. Policies NH1 to NH6 of the Local Plan provide that wherever possible, development that would have an adverse impact upon designated sites, valued habitats, protected species, landscape character and protected trees is not permitted.
238. Development can damage the natural environment in a number of ways, including: direct loss of habitat; changing landscapes to a less valuable form; fragmenting habitats; sealing of land under permanent structures; pollution. Development can also benefit the natural environment by: improving landscapes; habitat creation; resolving issues such as point-source pollution.
239. A basic part of conserving the natural environment is protection of designated sites. Policies NH1 to NH3 were aimed at protecting nationally and internationally valued sites as well as sites of regional and local significance. Development does not commonly coincide with designated sites but occasionally it does. Few applications - around 20 - have been received within or partly within a Special Protection Area. These include works to North Berwick Harbour, creation of new golf holes at the Renaissance Club, Dirleton, and electricity works related to Inch Cape wind farm, as well as more minor applications. The PAN recently received for Cockenzie Energy Park is also partially within the Firth of Forth SPA.
240. Development can affect the wildlife value of a designated site even when the proposal is some distance from the site itself. Habitat Regulations require assessment of a project where it is likely to have a significant effect on a Natura 2000 site, no matter how far away from the site it is. If there is likely to be a significant effect, the development can only go ahead in limited circumstances. East Lothian's coast is of international importance because of its value for wintering birds, reflected in the designation of the Firth of Forth as an SPA. Pink footed geese are cited in the SPA, and have been a significant issue for some planning issues, notably wind turbines. Development within major feeding sites outwith the SPA boundary requires assessment to make sure the interest of the SPA is not affected. Survey work by the Ranger Service and volunteers since 2010 has helped to identify major goose feeding areas so that targeted advice can be given. An application for an airfield at Dirleton was ultimately refused because of the predicted impact on the Special Protection Area. Disturbance to birds at a time when weather is poor and food is scarce can also have a serious impact on SPA bird populations. Residential development and an increased population, particularly in coastal towns, will likely increase the number of visitors to the coast. In simple terms, more people bring more disturbance to birds. Some tourist developments similarly could cause increased disturbance. Management of sites can mitigate the impact of disturbance. Monitoring of visitor numbers and visitor activities will help assess how coastal sites are being used. Monitoring numbers of wild species (birds, butterflies etc) and the quality of habitats will inform an understanding of the value of the coast (and other sites) and how to manage popular areas to sustain people and wildlife.
241. Parts of East Lothian drain into the River Tweed Special Area of Conservation. Applications for windfarm development in the Lammermuirs have had the potential to affect the water quality of this site through silt entering the watercourse. The risks of this happening have been reduced through the agreement of conditions on the installation of silt traps.
242. Around 60 applications have been received within SSSI's since the adoption of the local plan, most of which were householder or advertisement applications or minor applications such as creation of a bench. The main area where there have been proposals with the potential to affect the SSSI were tourist/recreational proposals, including a campsite at Lochhouses and improved shower facilities

at John Muir Country Park. A proposal to create three golf holes and amend the golf course layout at The Renaissance Club was partly within the Firth of Forth SSSI. This proposal was approved only after substantial redrawing of the plans to move holes and areas of play away from sensitive habitats. A working committee comprising the Council, SNH and the golf club ensures that the SSSI continues to be unaffected by the golf development, and has introduced additional positive ecological management.

243. An audit conducted in 2010 showed that about two applications per year coincided with wildlife sites. In addition there were a few applications close enough to wildlife sites to potentially affect them. Although a small number in an individual year, impacts could accumulate and become significant over time
244. As well as sites, some species receive legal protection. Bats are protected by EU legislation and have been a common consideration with steading developments. Bat surveys have been requested where necessary, including mitigation to ensure minimal disruption to these species.
245. Most developments do not affect designated sites or protected species but wider biodiversity issues must be considered. Policy NH6 considers trees and wetlands, while Policies DP12 – DP14 cover biodiversity in relation to development sites.
246. The principal residential development sites have been, overwhelmingly, arable fields on the edge of towns. To benefit biodiversity, features such as watercourses, woodlands, and hedgerows should be incorporated into development design and linked to similar features in the surrounding countryside. The design for Letham, for example, incorporates the Letham Burn into a linear park. The Letham Burn supports a protected species (water vole) and so improvement of the habitat through development should be beneficial for this species.
247. Similarly, there was potential to create pond habitat for great crested newt at Orchardfield in East Linton. Partly because the opportunity was recognised late in the planning process the habitat was not created. However, the principle argument remains: development can have a distinct positive impact on biodiversity without compromising the proposal, if the opportunities are implemented. East Lothian, as a county, is so closely managed that such opportunities need to be taken if biodiversity benefits are to be realised.
248. On balance, development on intensively managed arable fields is likely to have a positive impact on biodiversity through creation of landscaping, gardens and a greater diversity of structures. As development density increases, however, there is a need to ensure that aspects of development design function as effectively as possible.
249. Structure planting around the outside of residential developments is used to screen new developments from the outside. The traditional structure planting was typically 10m wide. This offered some wildlife value, however as gardens usually back onto it, public access was discouraged. Structure planting should accommodate a multi-use philosophy. This could include wider areas of planting and incorporation of paths so that the landscaping is brings benefits for wildlife and as an active part of residents' amenity, rather than designed solely as a passive screen.
250. This type of multi-use approach can be extremely important in higher density developments. Following residential expansion, Wallyford will be constrained between the A1 immediately to the south and the railway line immediately to the north, with only one off-road path on each side. Adopting a multi-use approach to peripheral structure planting would create a broader woodland strip (with enhanced wildlife value) which allows people additional and opportunities to walk around their neighbourhood in more natural surroundings.

251. SUDs ponds have the potential to be considerable wildlife and landscape features as well as water treatment and flood alleviation facilities. SUDs ponds are an opportunity for wildlife enhancement that currently do not meet their full potential. To be adopted by Scottish Water, ponds must comply with a standard that results in a functional design. It would be desirable to offer SUDs pond design where wildlife and landscape design match water treatment utility. This would require discussion with Scottish Water.
252. Some developments have also had have a marked and positive impact on biodiversity. Crystal Rig II wind farm resulted in the felling of about 350 ha of conifer plantation at Cracking Shaw. This plantation had matured to an extent that it had shaded out the ground flora and did not contribute any significant habitat value. Since the plantation was felled, the ground flora of heather and other native upland plants began to re-colonise.
253. The developer also contributed a significant amount of money to fund a project to support black grouse in the Lammermuirs. The project fulfilled a planning condition for the developer and resulted in a significant area of the Lammermuirs developing habitats of benefit to black grouse. This included the planting of open woodland, restructuring of conifer plantations and changes to grazing regimes to encourage grassland habitats. This work would not have been possible without support from the developer.
254. Policies NH1a, Internationally Protected Areas, NH1b, Sites of Special Scientific Interest, NH2, Wildlife and Geological Areas and Policy NH3, Important Local Biodiversity Sites are consistent with national and strategic planning policy. SSSI's continue to require policy protection. This policy could be amalgamated with NH2 and NH3 to protect national and local sites while giving extra protection to the specifically cited features of SSSI's. Further policy and guidance would be included in the Supplementary Guidance on Green Networks.
255. The Scottish Wildlife Trust is no longer identifying local sites. It is recognised that the role of wildlife sites has changed from one of protecting individual locations to one of protecting a coherent wildlife network. New methodology has been produced to assist local authorities in taking over this task. As a result, a review of the boundaries of Wildlife Sites (now termed Local Biodiversity Sites) has been undertaken and changes are proposed (see Appendix 1 for boundary changes).
256. The principal aim of the review was to link designated sites and create an identified wildlife network. The Council has a duty to conserve biodiversity in its areas generally. The review considered the fact that many of the interests of the SSSI's in East Lothian are not in favourable condition, or are declining. One of the reasons for this may be the treatment of areas around the SSSI. Reviewing local site boundaries therefore brought an opportunity to provide greater support for the interests of SSSI's, where this was justified by the quality of the proposed sites biodiversity value. The distribution of priority habitats, including linkages between designated sites, has been used to review the boundaries of Local Biodiversity Sites. This kind of review has only been possible, particularly along river corridors, because of improvements in GIS technology. The boundaries of river sites have now been mapped to include riparian habitat, which was the original intention but had not been effectively carried out previously due to lack of resources. As a result, Wildlife Site boundaries have been expanded to include neighbouring semi-natural habitat, as identified from historic surveys or aerial photographs. The boundary review resulted in the designation of some new sites, most notably the Lammermuirs. This expansive site is the single largest collection of priority habitats as listed in the East Lothian biodiversity Action Plan in East Lothian (see Figure 36).



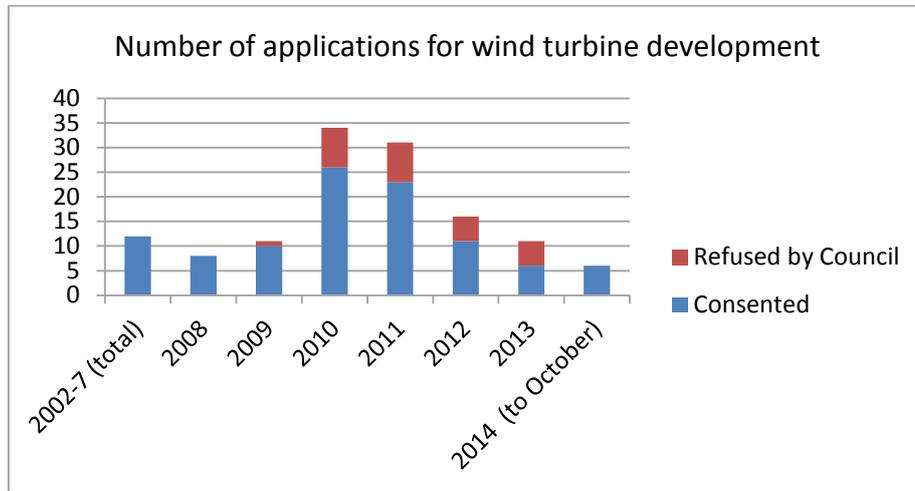
**Figure 74: Proposed new boundaries of Local Biodiversity Sites and SSSI's.**

257. The proposed new boundaries will therefore support SSSI's by linking them with other suitable habitat, as well as protecting local biodiversity.

## Landscape

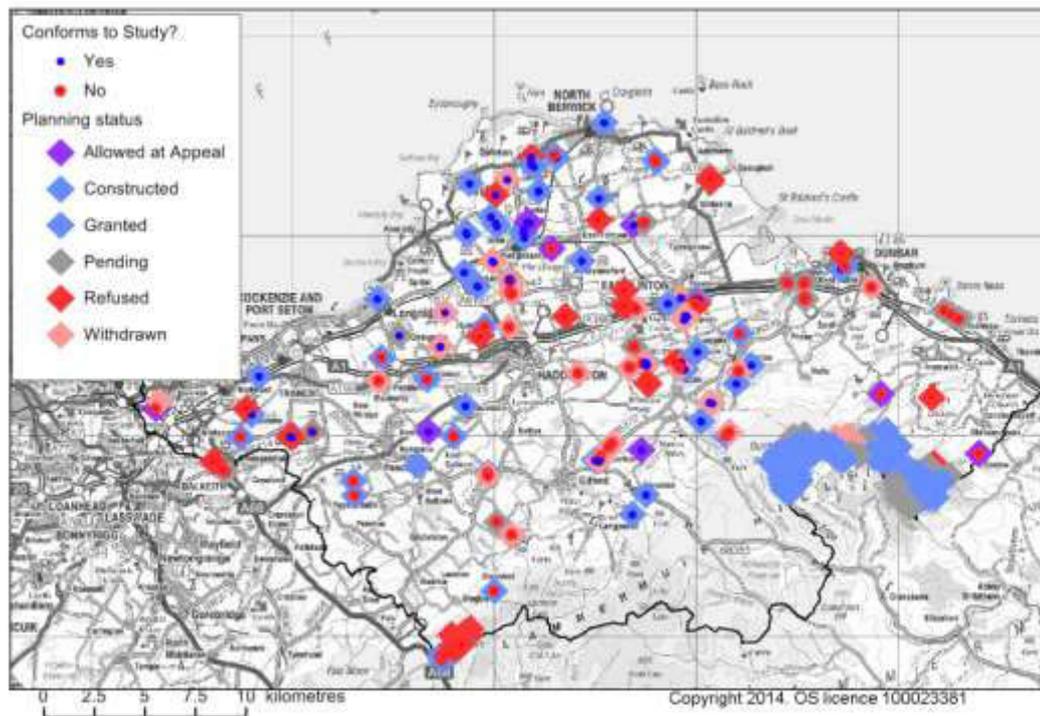
258. East Lothian's landscape is generally in a good state of repair, with very few areas which do not appear as well managed and in beneficial use. Issues which have arisen during the Local Plan period are the increase in applications for renewable energy installations, in particular wind, but also solar power and anaerobic digestion, as well as related infrastructure, including large scale items such as substations, tracks and cable routes. Pressure for residential development on the outskirts of towns has continued.
259. Wind applications have increased markedly, though numbers appear to be falling off more recently, as shown below. These range from domestic turbines to large scale schemes in the Lammermuirs. Larger wind turbines have the potential to influence landscape and visual amenity over a wide area due to their scale. The impact of wind development on the landscape is controlled by Policy NRG3, which requires that such proposals do not change the landscape character in an unacceptable way, or have an unacceptable visual impact on landscape, including the impact on distinctive public views, landmark buildings or natural features. This policy makes reference to the Landscape Capacity Study for Wind Turbine Development in East Lothian (LCS), which was carried out in 2005. This study has since been supplemented by a further study covering smaller scale development in 2011. Guidance for Wind Turbine Development over 12MW was adopted in 2013, which includes a spatial framework for larger windfarms. This guidance will have to be reviewed following changes

to SPP. Local Plan policies on development in the countryside (DC1) and on design (DP1 and DP2) also aim to protect the landscape.



**Figure 75: Number of applications for wind turbine development**

260. Since the adoption of the Local Plan, 29 applications for wind turbine development have been refused (or left undetermined). All but two of these were on grounds of harm to the landscape. The applicant appealed the decision in 19 cases, and a third of these cases the appeal was upheld. These include the 67m turbine at West Fortune Farm, which has now been constructed, a 106m turbine at Woodhall, a 47m turbine at Queen Margaret University and a 35m turbine at Waughton. shows the outcome of planning applications for small scale wind turbine development according to whether it conforms to the heights shown in the Design Guidance for Wind Turbine Development in Lowland Areas.



**Figure 76: Conformity of height of wind turbine to the height in the Landscape Study** (note: some of these applications were determined prior to the study and others are of a typology to which it does not apply).

261. The Supplement to the LCS gave further design guidance as well as a broad indication of acceptable heights for turbines, for example that they should relate to existing buildings. This means that some turbines which conform to the overall height indicated may not accord with the detailed design guidance in the study. Applications for turbines may also be refused on grounds other than their impact on the landscape, such as noise or biodiversity impact. In addition, turbines may sometimes be considered acceptable on landscape grounds in a particular location, even where they are higher than the study indicates.
262. Figure 76 above shows however that broadly turbines have been accepted where they conform to the heights in the study, and refused where they do not. Notable exceptions to this were turbines lost at appeal to Scottish Ministers at West Fortune, Woodhall, and Ferneylea. Also, turbines have been approved on appeal where they conform with the heights of the study but were initially refused. This may indicate that decision makers are more comfortable referring to the height bands shown in the study than the detailed guidance on siting it contains.
263. In addition to applications made to East Lothian Council, a large scale windfarm at Wester Dod, Monynut in the Lammermuirs was consented by the Scottish Government, following a public inquiry. Three of the turbines were removed from the application following representations from the Council on their visual impact on Oldhamstocks Conservation Area, however others with some visual impact were included in the consent.
264. There have been a handful of planning consents for free-standing solar arrays, for example at Fenton Barns and at Newmains by Stenton, which will be a new type of element in the landscape. Though they can have visual impacts due to their design, they are generally less prominent than wind turbine development.

265. There is increasing pressure for development outwith existing towns. The Council has lost planning appeals for example at Beveridge Row, Belhaven, and at Dovecot and Aberlady Road in Haddington, for residential development adjacent to existing towns. This has the potential to affect their landscape setting, and is part of the reason behind the proposed Countryside Around Towns policy. This policy would set out clearly where development should be directed to within current landscape capacity, and where it should not go.
266. An additional requirement as development pressure increases, is to define the coast, to help steer development which does not require a coastal location away from this sensitive area.
267. Areas of Great Landscape Value derive from Scottish Office Circular 1960/2, which allowed planning authorities to designate areas on the basis of their scenic attraction and tourist potential. The areas were originally designated in the 1970's, with some extensions following this. There have been some 300 applications for development in AGLV's since October 2008. Around half of these were for householder development. There were around 10 applications for agricultural buildings, mostly approved.
268. There were 7 applications for wind turbine development in AGLV's of which all were refused bar a small windfarm at Keith Hill, by Humbie, though turbines at Carfrae and Ferneylea were subsequently allowed at appeal and the Wester Dod windfarm referred to above is also in the Lammermuir AGLV. Wind development, both in East Lothian and offshore, has also given rise to the need for supporting electricity works. This included an extension to Crystal Rig substation – a large piece of infrastructure necessary for exporting the power from the wind turbines. Although it is a large visually intrusive structure its detrimental visual impact was reduced by siting within the lower areas of the site and the careful use of cut, bunding and landscaping.
269. Pressure for recreational/tourism development continues, mainly to do with outdoor recreation or golf. Notable new facilities have been the outdoor recreation centre at Fox Lake, by Dunbar, new golf holes at the Renaissance course, Archerfield, the fortress, cafe and workshops at East Links Farm. A 100 bed hotel and alterations to the golf course at Whitekirk also received permission. There have also been smaller scale proposals for holiday lettings, equestrian related development, tearooms and others . Consent has been granted for residential developments, mainly at Archerfield as the plots with outline permission are built out, but also in a limited number of other instances, including at Seton Mains and Whittingehame. There have also been a small number of applications for business use such as offices.
270. As more areas are taken up for recreational, renewable energy and residential development, pressure is likely to increase on those areas which remain. This increases the importance of maintaining a clear and robust approach to protecting those areas which have a particular landscape value. AGLV's were designated some time ago, and the justification, motivation and methodology for designating local landscape areas has since altered somewhat, and the landscapes themselves have also changed. Retaining policy protection for local landscape area designation still remains relevant, with the impact on the AGLV being mentioned as a reason for refusal of planning permission in around a third of the applications recommended for refusal within such areas. SNH and Historic Scotland have produced guidance<sup>26</sup> on designation of 'Special Landscape Areas' which would broadly replace AGLV designation. A review of local landscape designations based on this

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<sup>26</sup> SNH/Historic Scotland "Guidance on Local Landscape Designations" 2005 available at <http://www.snh.gov.uk/publications-data-and-research/publications/search-the-catalogue/publication-detail/?id=389>

guidance and referring to the Landscape Character Areas identified in SNH's report "The Lothians Landscape Character Assessment" is needed, and is underway. This will consider all of East Lothian's landscapes and follow the new approach to designating Special Landscape Areas.

271. Gardens and Designed Landscapes on Historic Scotland's Inventory are protected by Local Plan Policy ENV8. However, a new or extended policy giving protection to Gardens and Designed Landscapes that are on a local list not on the Inventory is required by Scottish Historic Environment Policy. ELLDP should extend protection to Gardens and Designed Landscapes not on the Inventory, making clear the difference between inventory and non-inventory sites.
272. Trees can be important in the landscape both individually and in groups. Some of East Lothian's most important trees are covered by Tree Preservation Orders, and policy in the Local Plan. Trees are lost within TPO's periodically due to old age and disease. Almost always, replacement planting has been required, for example at Mainhill in Morham a large ash tree was felled as it was in poor condition with a lot of dead wood, and in this location was felt to be a possible danger to the residents, and was replaced by a beech tree. One TPO has been revoked since 2008, TPO 47 – Eden Hotel at Belhaven Road, Dunbar. Development of housing in the area immediately adjacent to the trees led to pressure from residents to fell the trees due to problems such as trees over hanging the roof-space or some trees declining in health due to disease, compounded by a lack of adequate space to carry out replacement planting means there are no longer any trees worthy of protection in this location. The Council has been reviewing and updating TPO's, and will continue to do so as resources allow.
273. In addition to protecting the landscape, policies within the Local Plan provide for the provision of landscaping in new development. For large scale developments, a landscape structure for the whole development is required. This includes both the landscaping for the development as well as the layout of the development. The approach has generally altered from requiring a wide landscape buffer strip around development to more imaginative planting with open space, hedges and feature trees so that the development is visible but views towards it are broken up and permeability and views through developments are increased. Andrew Meikle Grove at Orchardfield, East Linton and Law View at Lochbridge Road, North Berwick are examples of this. Open land may also be used to provide a setting, as to the south of Pinkie Mains. Sometimes landscape planting fails to thrive due to a number of possible factors including lack of maintenance or damage and vandalism, as has happened for example at Windygoul in Tranent. Landscape structure would benefit from the dev of landscape design recommendations in the form of Supplementary Guidance.

### Key Issues for ELLDP

- Protect the landscape setting of towns and villages, whilst accommodating significant levels of new housing and other development
- Influence the siting and design of new wind turbines to avoid harmful landscape impacts and integrate large scale electricity distribution infrastructure into the landscape
- Review local landscape designations, which will result in the designation of Special Landscape Areas
- Address non-Inventory gardens designed landscapes, where their local or regional value has been identified
- The need to define the developed and unspoiled coast, as well as coastal areas with significant constraints
- The need to improve integration of biodiversity policies to help support or return SSSI's to favourable condition and improve biodiversity in the area generally

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***Has the Local Plan ensured that new development has been supported by appropriate infrastructure, social, educational and community facilities, and where necessary ensured that developers have contributed towards providing it?***

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## **Delivering Infrastructure**

274. The Local Plan seeks to ensure that the level of new development planned for through is supported by the provision of appropriate infrastructure including new school capacity, on and off-site road improvements, public transport improvements and related infrastructure and water and drainage infrastructure, generally all to be provided at the developer's expense. Policy INF3 of the Local Plan only permits new development where the developer makes appropriate provision for infrastructure and community facilities that are required as a consequence of the development.
275. Examples of infrastructure investment required as a result of development include the Pinkie Mains housing development where Pinkie St Peters Primary School required to be extended to accommodate children expected to live in the new houses. The developer of the Pinkie Mains site also contributed towards the provision of serviced land for 118 affordable houses to be provided on the site, to the upgrading of existing facilities at Wallyford Park; to the SCOOT traffic control system in Musselburgh town centre; to the heritage implementation plan for the Battle of Pinkie site.

### **Key Issues for ELLDP**

- Carefully managing the phasing of new housing delivery to ensure sufficient education capacity.
- Co-operation with key agencies and infrastructure providers to secure necessary strategic infrastructure improvements to support East Lothian's future development.
- Securing appropriate developer contributions to help fund infrastructure required to support new development.

## **Energy**

276. The context for energy development, in particular renewable electricity generation, has changed considerably over the Local Plan period. Scottish Government targets are now that the equivalent of 100% of electricity consumption should be met by renewable generation. Financial support has resulted in an increasing number of proposals for a variety of renewable energy technologies; wind, solar, anaerobic digestion, hydro, landfill gas and energy from waste installations have all received planning consent over the period. The challenge for these applications is to allow the development of renewable energy, with the economic and carbon reduction benefits that this brings, without damage to the natural and built heritage (see paragraph 259 for information on wind applications).

277. Alongside the expansion of renewable energy, Cockenzie, a coal fired station, has ceased operation. Plans to re-power the station as a gas plant have not yet gone forward, and may not do so. It is clear therefore that policy towards existing large scale power station sites has to be reconsidered to allow for alternative uses. Policy NRG1 covers electricity generating stations. This policy safeguards land identified for use in association with power stations, and presumes against uses incompatible with that use. It currently covers land at Cockenzie and Torness Power Stations. While a power station is in operation, it remains relevant to safeguard land which may be required for that operation. However, this policy requires to be amended to control acceptable uses where use as a generating station ceases. This applies to Cockenzie, should the consent for a replacement power station not be implemented (the consent is valid until October 2016) and may also apply to Torness Power Station, which has consent to operated until 2023, within the timescale of the plan. This policy needs to be amended to identify and accept alternative uses should the power station use cease.
278. Local Plan Policy NRG2 requires consultation with the operators of Torness Power Station for their comments on development nearby. This is now covered by development management regulations.
279. Policy towards wind power is set out in Local Plan policies NRG3-6. In addition, the Landscape Capacity Study for Wind Turbine Development in East Lothian, 2005, supplemented by a further study in 2011, is referred to and aims to help guide wind turbine development to the right places. Further guidance was adopted by Council on smaller scale wind development, Planning Guidance for Wind Turbines in Lowland East Lothian, and a spatial framework as required by Scottish Ministers, Guidance for Windfarms of 12MW and over. Figure 76 shows that smaller scale wind turbine development has largely conformed to the broad heights indicated in this study, though it should not be ignored that due to the scale of wind turbines, one badly sited turbine has the potential to adversely affect a large area. Applications have been received in other local authority areas for the re-powering of existing schemes. Although the windfarms in East Lothian are less than half way through their consented life-span, policy should be included in the plan to consider re-powering.
280. SPP has produced a revised approach to producing spatial frameworks for wind development, and this will have to be taken into account in the LDP.
281. The Local Plan does not contain policy on heat networks, and it is proposed to include this in ELLDP.

### Key Issues for ELLDP

- Encourage renewable energy generation in the right locations
- Requirement to adopt a Spatial Framework for wind in line with methodology set out in SPP
- Consider how to encourage and implement heat networks
- Alternative uses for power generation stations once use as such as ceased

## Policy Review

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282. The previous section considered the overall effect of the broad policies and proposals of the Local Plan and the impact they have had on East Lothian since the Local Plan was adopted in 2008. This section looks more closely at the individual policies of the Local Plan. It provides a brief commentary on whether the policies have been successfully used to manage development, if there have been any challenges in applying them or any issues raised, and whether they continue to be of relevance for the Local Development Plan.
283. This review forms a starting point for the more detailed discussion of the policy approaches and preferred alternatives contained in the Main Issues Report and Interim Environmental Report, which considers the possible environmental impacts of different future policy approaches to managing development.
284. The policy review highlights those areas where policies will be reviewed and amended and also those areas where new policies are required. Some policies will be amalgamated with others. The Local Plan's Development Policies DP1-7 will be reviewed in line with Scottish Government policies on Designing Streets, Creating Places and Scottish Planning Policy with particular regard to placemaking and green network provision.
285. All policies will be reviewed to consider whether they would be best placed either within the proposed ELLDP or be supplementary guidance to it. Existing supplementary guidance will be reviewed and updated where required. The more minor policy areas and those where there can usefully be expansion of the guidance in the policy, including for site specific policies, will be likely to be the subject to supplementary guidance.
286. Supplementary Guidance will be prepared on the following topics: Development in the Countryside including Farm Steading Conversions; Biodiversity (including biodiversity and development sites, and Local Biodiversity Sites); Special Landscape Areas; Town Centre Strategies; Conservation Area Character Appraisals; Non-Inventory Gardens and Designed Landscapes; Development Guidance prepared for sites in the form of Development Frameworks, Briefs and Guidelines (including Blindwells); Minerals including Shale Oil and Gas; Wind Development; Developer Contributions; Flooding and Adaptation to Climate Change; Design Standards for New Housing Areas; Affordable Housing; Central Scotland Green Network (this may incorporate some of the other Supplementary Guidance); Placemaking; Shopfronts and External Security; Battlefields; Countryside Around Towns; Geodiversity Sites; Renewable Heat; Low and Zero Carbon Technologies in New Buildings.
287. Supplementary guidance may also be produced on the following topics; Protection of Local Facilities; Hot Food Outlets; Open Space and Play Standards; Replacement Windows; SUDs; Renewable Energy Technologies other than wind.

Policy	Title	Purpose and scope of policy, and comments on its implementation/impact.	Continued Relevance for the LDP?	Proposed Action
<b><i>Countryside and Undeveloped Coast</i></b>				
DC1	Development in the Countryside & Undeveloped Coast	This policy is a key policy that states what type of development is considered suitable in the countryside outwith existing settlements. It has been successful in managing the amount and scale of development in the countryside and has ensured that development has been of an appropriate scale and character for its rural setting. It has been supported in appeals to prevent inappropriate development and has also been successful in encouraging steading conversions by restricting other types of housing development. It has also supported appropriate business development in the countryside.	Yes, a policy to manage development outwith settlements will be required. The specific details of the policy and possible amendments could be considered through the MIR in response to representations received e.g. in relation to replacement dwellings, infill development etc.	Review and amend in accordance with the MIR
DC2	Development in the Edinburgh Green Belt	This policy restricts development in the Green Belt to those types and scales of development that are considered appropriate and will not undermine the objectives of the Green Belt e.g. agricultural uses, countryside recreation etc. The principles of the policy are consistent with national and strategic planning policy. The policy has been successful in resisting inappropriate development proposals in the Green Belt whilst supporting appropriate proposals such as tourism uses.	Yes, a policy to protect Green Belt objectives from being undermined by inappropriate development will be required in the LDP.	Review and amend in accordance with the MIR
<b><i>Biodiversity and Natural Heritage</i></b>				
NH1a	Internationally Protected Areas	This policy seeks to ensure that development does not have adverse impacts upon the nature conservation interests of internationally	Yes, but requires updating and rewording, to include a reference to the need for appropriate assessment, and the	Review and amend:

		protected areas.	notification requirement to Scottish Ministers. Amalgamate Policy NH1a, NH1b, NH2 and NH3 to provide an integrated approach to protecting designated sites, while giving additional policy protection to the cited interest of SSSI's and Natura 2000 sites. Further policy and guidance would be included in the CSGN Supplementary Guidance.	
NH1b	Sites of Special Scientific Interest	This policy seeks to protect sites of special scientific interest from inappropriate development. Show the revised Local Biodiversity Site and Geodiversity Site boundaries on the Local Plan map.	Yes, SSSI's continue to require policy protection.	Review and amend (see NH1a above)
NH2	Wildlife and Geological Areas	This policy requires mitigating measures to be provided where development is permitted which adversely affects any designated site of natural heritage value.	Yes, mitigation will continue to be required. This policy could be amalgamated (see NH1b above)	Review and amend (see NH1a above)
NH3	Important Local Natural Heritage Sites	This policy seeks to protect locally important natural heritage sites from harmful development.	Yes. The Council has a duty to conserve biodiversity and protection of local sites plays an important part in this.	Review and amend (see NH1a above). Include Geodiversity Sites and revised Local Biodiversity Sites on the ELLDP map and extend policy coverage to include these sites.
NH4	Areas of Great Landscape Value	This policy prohibits development that will harm the landscape character and appearance of AGLVs. The application of this policy has relied on judgement on a case by case basis and a consistent approach would have been assisted	Yes, a policy on protecting areas of special landscape character will be required in the LDP. The policy wording for protection for locally valued landscaped areas needs to be more	Review and amend. Show Special Landscape Areas on the ELLDP map. Include further guidance in

		with the use of landscape character assessments or 'statements of importance' for the AGLVs. Additionally the AGLVs should have been reviewed and replaced with 'local landscape areas' of 'special landscape areas' to be consistent with SPP.	robust. Local landscape is currently being reviewed leading into identification of Special Landscape Areas.	Supplementary Guidance on the CGSN.
NH5	Protected Trees	This policy outlines the situations where works to trees within Conservation Areas or covered by TPOs will be permitted.	Yes, but could be renamed, expanded and combined with Policy DP14 to cover woodland. Changes should reflect that the associated British Standard is advisory, and reflect the new issue date of the standard.	Review and amend
NH6	Watercourses and Wetlands	This policy includes a presumption against engineering works on watercourse in order to protect ecology and amenity.	Yes, a policy on the water environment will be required. This policy requires updating and renaming to reflect legislative and policy requirements, including the Water Framework Directive and SESplan Policy 15. The preferred approach is expand this policy to seek to prevent deterioration of the entire water environment (also including lochs, coastal, estuarine and ground water) resulting from new development, and where appropriate, promote its enhancement. The policy will presume against unnecessary engineering works in the water environment. Supplementary Guidance may be provided to expand on this policy and promote multiple benefits.	Review and amend
<b>Built and Historic Environment</b>				
ENV1	Residential	This policy seeks to protect the residential	Yes, a policy to protect amenity will be	Review and amend

	Character and Amenity	character and amenity of residential areas by permitting only appropriate types of development that will not adversely affect character or amenity.	required, however could be part of a wider overarching amenity policy rather than just applying to designated 'ENV1' areas.	
ENV2	Town and Village Centres, Other Retail or Mixed Use Areas	This policy states the types of uses that are considered acceptable in town and village centres and other retail and mixed use areas. This policy is heavily used given the high number of change of use proposals within town centres. The policy has been used numerous times to request further marketing evidence to demonstrate retail units are unviable before a change of use has been permitted. Clearer written guidance on the level of marketing required would have assisted in the application of the policy and would have given clearer guidance to applicants. The current policy does not offer any protection of retail units within village centres, only defined town centres.	Yes, a policy guiding appropriate development in town, village and local centres will be required in the LDP. Amendments should be considered to better reflect Scottish Planning Policy and to permit the change of use of retail units to other town centre uses to increase the mix of uses in town centres and to clarify that these apply to ground floor uses only. Also a network of centres will need to be defined in accordance with SPP.	Review and amend in accordance with the MIR
ENV3	Listed Buildings	This policy prohibits development that will adversely affect the historic or architectural character of a building or its setting.	Yes, a policy to protect listed buildings and their settings will be required. Requires some amendment to reflect that extensions and alterations should be of good design both in design and use of materials and to reflect Scottish Historic Environment policy in respect of required assessment criteria for demolitions.	Review and amend
ENV4	Development within Conservation Areas	This policy requires new development within Conservation Areas to preserve or enhance their special architectural or historic character. The inclusion in the East Lothian Local Plan 2008 of short Conservation Area Character Statements (due to be replaced by more comprehensive appraisals) has helped to determine the special character of these areas but more detailed character appraisals would	Yes, a policy to protect and enhance the character of Conservation Areas will be required. Amend to clarify policy position with unlisted buildings in Conservation Areas. Conservation Area Appraisals will replace Conservation Area Character Statements in due course and will be supplementary guidance that should be referred to in the policy.	Review and amend

		have helped further.		
ENV5	Conservation Areas: Proposed Restriction of Permitted Development Rights	This policy proposes amendments to Article 4 Directions	Changes to the General Permitted Development Order will require this policy and Article 4 Directions to be reviewed.	Review and amend
ENV6	Illuminated Advertisements	This policy prohibits illuminated advertisements in Haddington and East Linton to preserve the special character of these Conservation Areas.	Yes but consider amalgamation with the Policy ENV4 Development within Conservation Areas Further work on Conservation Area Appraisals will consider whether this restriction should also be applied to any other Conservation Areas.	Review and amend
ENV7	Scheduled Monuments and Archaeological Sites	This policy prohibits development that would harm a site of archaeological interest or its setting, particularly a scheduled monument. It requires a professional archaeological assessment where proposed development could affect a scheduled monument or site of suspected archaeological interest. It also promotes public access and interpretation of archaeological features where these have been preserved or enhanced within a development site.	Yes, a policy to protect archaeological sites and scheduled monuments will be required. It could be expanded to include historic battlefields, or a separate battlefields policy could be prepared.	Review and amend
ENV8	Gardens and Designed Landscapes	This policy prohibits development that would harm the conservation objectives of areas included in the national Inventory of Gardens and Designed Landscapes.	Yes, a policy to protect the key elements of GDLs will be required but requires to be extended to include identified Gardens and Designed Landscapes of regional and local importance and their future management, making clear the difference between inventory and non-inventory sites. The meaning of conservation objectives requires clarification.	Review and amend
ENV9	Grey Walls, Gullane	This policy prohibits development that would harm the landscape setting of Greywalls, Gullane and its associated designed landscape.	Yes a policy to protect Greywalls' landscape setting will be required. It may be widened to include land south of the	Retain

			coast road.	
ENV10	West Road Field, Haddington	This site specific policy has been used in the determination of a planning application on part of the site and was successful in limiting the scale of housing proposed on the site. The Council was minded to grant permission at Committee however the S75 agreement has not been agreed to date.	Yes this policy remains relevant.	Retain
ENV11	High Street/Inch View, Prestonpans	This policy is designed to ensure that seaward views are retained in this local area of Prestonpans.	Yes, this policy continues to be appropriate for this part of Prestonpans.	Retain
ENV12	Former East Fortune Hospital	No planning applications for redevelopment of the site have been received for the site during the Local Plan period so the policy has not been applied. A site submission promoting the site for development has been received in the call for sites for the MIR.	Yes, this policy remains relevant. The East Fortune site continues to require a planning policy to guide its future development including that of its recently reaffirmed listed buildings. Review to ensure the policy remains clear and reaffirms the need to ensure a long term future for the listed buildings.	Review and amend
ENV13	St Joseph's School, Tranent	No planning application has been submitted for the site in the Local Plan period.	The St Joseph's site continues to require a planning policy to guide its future development. The detail of the policy should be reviewed.	Review and amend
ENV14	The West Harbour Area, Cockenzie	A housing development on the site was refused permission by the Council's Planning Committee (against officer's recommendation) and then allowed on appeal. The policy's intentions with regards the range and mix of uses that should be delivered on the site were disputed by different parties during the process.	Yes, although clarification would be useful to take account of the issues raised during the recent planning application and appeal. A development brief should be prepared to guide environmental improvement and new development in the area.	Review and amend
<b>Business and Industry</b>				
BUS1	Business and General Industrial Allocations	This policy allocates sites for business and industrial use (classes 4,5,6) and controls the use classes that are allowed on these sites. There has been pressure for alternative uses	Yes, a policy regarding acceptable land uses on employment sites will be required. It requires amending to include waste management facilities in	Review and amend in accordance with the MIR

		such as retail on BUS1 areas during the Local Plan period. The Council lost an appeal against refusal of planning permission for a garden centre on a BUS1 site. Council Officers recommended refusal of another retail proposal on BUS1 land in Prestonpans but it was allowed at Local Review Body. There has also been developer interest in developing housing on sites covered by Policy BUS1. Some enabling housing development was allowed on a BUS1 area in Prestonpans to allow the servicing of the employment land. In general, it has been challenging to apply Policy BUS1 effectively when faced with development proposals for uses not permitted by the policy.	accordance with Annex B of the Zero Waste Plan. The LDP should consider whether more mixed uses should be allowed on such sites, for example infrastructure or waste providers and training facilities where such uses would not compromise existing users.	
BUS2	Business Class Locations	This policy allocates sites for business use (class 4 and in some cases class 6) and controls the use classes of development that are permitted on them.	Yes, a policy regarding acceptable land uses on employment sites will be required. Consider whether more mixed uses should be permitted, for example to include hotel use.	Review and amend
BUS3	Dunbar Harbours	This site specific policy supports the continued functioning of Dunbar harbour and to encourage uses related to the fishing industry. This has been successful and the fishing industry remains operational.	The policy remains relevant but should be reviewed and amended to make clearer.	Review and amend
BUS4	Bruntons Site, Musselburgh	Since the adoption of the Local Plan a new health care centre, superstore and social housing development have been developed at the former Bruntons site with land at the site of the former supermarket undeveloped, part of which has outline planning permission for a housing development.	No. The majority of the complex redevelopment of the former Bruntons site has taken place and the remaining land can be covered by general land use policy rather than a site specific one.	Delete policy
BUS5	Olive Bank, Musselburgh	This site specific policy sets out the use classes that are allowed in this mixed use area and permits use classes 1,2,3,4,5 and 6. A class 11 use was allowed as a departure to plan.	Yes, this policy is still relevant to this area.	Retain

BUS6	Kirk Park, Musselburgh	This site specific policy supports class 4 business use and class 8 and class 10 institutional (residential and non residential) uses at Kirk Park. The Council was minded to grant permission for a care village but the S75 agreement has not been concluded.	Yes, this policy remains relevant to this area.	Retain
BUS7	Former Oak Tree Filling Station, Haddington	This site specific policy supports the redevelopment of the former Oak Tree filling station in Haddington and supports a range of uses in principle. Planning permission has been granted for a supermarket on this site.	Yes but requires amendment to include support for retail use.	Review and amend
BUS8	Land at Bermaline Maltings, Haddington	This site specific policy supports the development of land between the Bermaline Maltings and the River Tyne for business and general industrial uses.	Yes, this policy remains relevant to this area.	Retain
BUS9	Proposals on Unallocated Land	This policy states that proposals for business and industrial developments on land not allocated for this purpose will not normally be permitted unless it meets a number of criteria including that there are no alternative and allocated sites in the area.	Yes, this policy remains relevant for East Lothian. Review to make clearer.	Review and amend
BUS10	Development Frameworks	This policy requires development frameworks prepared for a number of business and industrial sites by the Council to be taken account of in development proposals.	This policy is required but requires updating. Consider whether Development Frameworks should be in the same policy	Review and amend
<b>Tourism</b>				
TOUR1	Archerfield Estate, Dirleton	This policy supports the principle of high quality golf based hotel, leisure and recreational development within Archerfield Estate. A range of development has taken place within the Estate including the restoration of Archerfield House, a new golf clubhouse, spa facility, tourist accommodation and enabling residential development.	Given the development that has taken place to date this policy will need to be reviewed/updated to control development in the area. It should also refer to the Gardens and Designed Landscapes Policy.	Review and amend
TOUR2	Belhaven Chalets	This policy supports the continued use of the	Yes, the policy remains relevant but c	Review and amend

		Belhaven Chalets as holiday accommodation and prohibits them being converted to permanent residential accommodation. Only one planning application has been made in the area covered by this policy since the adoption of the Local Plan, for the erection of a new chalet on a plot that was previously occupied by a chalet. The Policy was applied and ensured the imposition of conditions on the planning application to limit the use of the chalet to holiday accommodation, through restricting the times of year it can be occupied.	could perhaps be dealt with by a more general policy covering tourist accommodation – i.e. an expanded Policy TOUR4.	
TOUR3	Dunbar Castle Vaults	This policy supports proposals for a commercial or tourist related development on the south side of Victoria Quay in Dunbar if it enables the underground vaults to be opened up to public view.	Yes, this policy remains relevant to this area.	Retain
TOUR4	Hotels	This policy seeks to resist the change of use of hotels to other uses unless it can be demonstrated that a hotel use is no longer viable, through evidence of marketing. This policy has been applied successfully a number of times to request further evidence that continued hotel uses are not viable, before the Council has permitted changes of use. There have been occasions where it has not been clear whether the policy should apply given that it only refers to ‘hotels’ and not other uses within Class 7.	Yes, a policy to protect hotels is still required but it should be considered whether it should also apply to other forms of tourist accommodation within Class 7 (boarding and guest houses and hostels).	Review and amend
<b>Retailing</b>				
R1	New Shops	This policy states the locational criteria for new shops and aligns with the ‘sequential’ approach in national policy which requires shops to be located within town centres and only if no site is available can they be located in edge of centre or other shopping area locations. The	Yes, a policy on new shops is required. This must align with the national policy framework for planning for town centres and retailing as set out in Scottish Planning Policy.	Review and amend

		policy only allows new retail park development where there are recognised shopping deficiencies that cannot be met in town centres. The policy also requires the submission of a retail assessment for retail proposals over 1000 square metres.		
R2	Protection of Local Shops	This policy seeks to protect local shops in villages, remoter rural areas and other areas of limited provision, by only allowing a change of use where the shop has been actively marketed and there is no prospect of a viable continued retail use, or the benefits of the proposed use would outweigh the loss of the shop.	Yes, the principle of protecting the loss of local shops should be retained. Consideration should be given to extending the scope of this policy to other services and to make clearer the situations where this policy will apply.	Review and amend
R3	Hot Food Outlets	This policy sets out the criteria which proposals for hot food takeaways must meet in order to be considered acceptable, including factors such as location, amenity, road safety, building alterations, opening hours and the cumulative effect of additional premises in areas where there are already other hot food takeaways.	Yes, a policy on hot food takeaways continues to be relevant. Supplementary Guidance may be helpful. The policy could also introduce limitations on the number of hot food takeaways in any one street/area.	Review
R4	Drem Station – The Old Ticket Office	This policy supports the principle of the change of use of the old ticket office at Drem station to a small village shop.	Yes, this policy remains relevant to this area.	Retain
<b>Minerals</b>				
MIN1	Hard Rock	This policy includes a presumption against the working of hard rock except where related to existing workings, or where in exceptional cases resources of a particular type or quality are unavailable from an alternative source within a reasonable distance.	Yes, this policy remains relevant	Retain
MIN2	Preferred Area of Search for Sand and Gravel Working: S of Longyester Farm	This policy identifies an area of search for sand and gravel extraction on land south of Longyester Farm.	Yes the policy remains relevant but should be amended to delete current area of search and reflect existing consent at Longyester.	Review and amend in accordance with the MIR

MIN3	Protection of Mineral Reserves	This policy prohibits development that would result in the sterilisation of mineral deposits that have, or can be shown to have a real prospect of being extracted economically and in conformity with development plan policies.	Yes, this policy continues to be required.	Retain
MIN4	Surface Mineral Extraction Criteria	This policy sets out all the criteria that proposals for surface mineral extraction must meet in order to be considered acceptable	Yes, a policy covering surface mineral extraction will be required in the LDP. Consider amendment of policy to make reference to an additional requirement to ensure there is no deterioration in existing water body status as classified under the Water Framework Directive. Criteria 1(a) requires amendment.	Review and amend
MIN5	Edinburgh Green Belt: Mineral Working	This policy includes a presumption against mineral extraction in the Green Belt unless the extraction and subsequent restoration would secure significant environmental improvements of an area of dereliction or contaminated land.	Yes this policy continues to be relevant.	Retain
MIN6	Supporting Information	This policy sets out the supporting information that is required to be submitted with planning applications for mineral working.	Yes, this policy continues to be relevant.	Retain
MIN7	Restoration	This policy covers the restoration of minerals sites and requires a restoration guarantee or bond adequate to cover the cost of restoration in the event of failure of the operator to carry out the agreed works.	Yes, this policy continues to be relevant. The role of restoration bonds/guarantees should be clarified.	Review and amend
<b>Energy, Waste &amp; Infrastructure</b>				
NRG1	Electricity Generating Stations	This policy safeguards land identified for use as or in association with a power generating station for that purpose.	Yes, though consideration of alternative uses should this use cease is required.	Review and amend in accordance with the MIR
NRG2	Torness Consultation Zone	This policy states that all planning applications received within a 4km radius of the Torness generating Station will be referred to British Energy for their observations.	No, this is covered by development management regulations.	Delete
NRG3	Wind Turbines	This policy sets out the criteria that need to be	Yes, the policy is required to be retained	Review and amend

		met in order for wind turbines, wind farms and associated infrastructure to be supported. It includes aspects such as landscape, visual impact, noise, shadow flicker, hydrology and cumulative impacts	in the LDP but it also requires to be reviewed. SEPA has proposed that it be amended to include the effects on soil and water. The policy should refer to Planning Guidance for the Location and Design of Wind Turbines in the Lowland Areas of East Lothian and the LCS. The reference to 'alternative, better sites' should be removed. It should specify that it does not apply to roof-mounted turbines. A section on re-powering of existing sites should be included. The policy will be expanded by Supplementary Guidance which will include a Spatial Framework.	
NRG4	Wind Power Sites – Restoration	This policy requires wind turbine developers and landowners to enter into a legal agreement to secure removal of turbines and associated infrastructure and restoration of the site once electricity generation has ceased.	Yes, this policy remains relevant.	Retain
NRG5	Edinburgh Airport Safeguarding Zone	This policy states that all wind turbine developments within the Edinburgh Airport Safeguarding Zone will be notified to the operators of Edinburgh Airport for their observations and comment.	This is not covered by Development Management regulations and so remains relevant. No change anticipated.	Retain
W1	Oxwellmains, Dunbar	This policy safeguards the site at Oxwellmains, Dunbar for waste treatment and disposal.	Yes, this policy remains relevant. It should be amended to make reference to the approval of an energy from waste plant with combined heat and power facility.	Review and amend
INF1	Pipeline Consultation Zone	This policy states that planning applications that are within the consultation distance of a notifiable installation will be referred to Transco and or the Health and Safety Executive for their observations before determining the application.	No, this is now covered by schedule 5 of the Development Management regulations.	Delete
INF2	Telecommunications	This policy offers support in principle for	Yes, this policy remains relevant	Retain

	Development	telecommunications development provided all reasonable alternatives have been examined and the proposal is the option that has the least environmental impact. The policy sets out a number of considerations that proposals must have regard to.		
INF3	Infrastructure and Facilities Provision	This policy requires developers to make appropriate provision for infrastructure and community facilities required as a consequence of their development.	Yes, but the approach could be reviewed/updated to ensure it is consistent with national policy and guidance prepared since the adoption of the Local Plan e.g. Circular 3/2012: Planning Obligations and Good Neighbour Agreements.	Review and amend in accordance with the MIR
INF4	The Scottish Fire Service Training School, Gullane	This policy recognises the operational requirements of the fire Service Training School.	No. The Training School is earmarked for closure and the policy will no longer be relevant. Its future redevelopment is considered in the MIR text.	Delete
INF5	Haddington Flood Plain	This policy prohibits greenfield development within the Haddington floodplain unless there is a direct operational requirement for infrastructure provision that cannot be located elsewhere. It allows brownfield development on the floodplain where it does not materially increase the risk of flooding on or off site. Areas of land that contribute or have the potential to contribute towards sustainable flood management may be identified on the Local Plan map or in Supplementary Guidance.	Yes, this policy remains relevant but should be reviewed to consider incorporation into a single flood plain policy applicable to potential areas of flood risk across East Lothian.	Review and amend
<b>Housing</b>				
H1	Housing Quality and Design	This policy seeks to ensure high quality and well designed housing developments that provide the appropriate mix and type of houses, and are well served by community facilities.	Yes, a policy approach that encourages high quality design in new housing developments is still relevant.	Review and amend and consider as supplementary guidance.
H2	Development Frameworks	This policy requires development proposals for strategic housing sites to conform with the	This policy is required but requires updating. Consider whether all	Review and amend

		relevant development frameworks prepared by the Council.	Development Frameworks should be in the same policy	
H3	Houses in Multiple Occupation	This policy sets out the criteria whereby planning applications for changes of use to a House in Multiple Occupation will be supported.	Yes this remains relevant.	Review and amend and consider as supplementary guidance.
H4	Affordable Housing	This policy requires development proposals of 5 or more houses to provide affordable housing – 25% of units, with the exception of Blindwells (30%) and Letham Mains (17%).	Yes this remains relevant but requires review	Review and amend in accordance with the MIR
<b>Education &amp; Community Services</b>				
ED1	Schools	This policy requires that school buildings and their playgrounds/playing fields are retained for educational and community use. However, it cannot be implemented in the case of the redevelopment of school sites that have become surplus to requirements.	Yes this policy remains relevant but requires review to be able to consider redevelopment opportunities.	Review and amend
C1	Minimum Open Space Standard for New General Needs Housing Development	This policy sets out the minimum requirements for open space provision within new housing developments.	Yes, the LDP or supplementary guidance will need to set out requirements for the provision of open space as part of new development and make clear how much, of what type and quality and what the accessibility requirements are. The current requirements should be reviewed in light of the findings of the Council's Open Space audit. Open space standards and any requirement for contributions to offsite provision will be reviewed.	Review and amend and consider as supplementary guidance
C2	Play Space in New General Needs Housing Development	This policy sets out the requirements for play space provision in new housing development.	Yes, the LDP or supplementary guidance will need to set out requirements for the provision of open space as part of new development and make clear how much, of what type and quality and what the accessibility requirements are. The current requirements should be reviewed	Review and amend and consider as supplementary guidance

			in light of the findings of the Council's Open Space audit.	
C3	Protection of Open Space	This policy protects recreational, leisure and amenity open space from loss to other uses with a number of criteria setting out situations where an alternative use could be considered acceptable.	Yes, this policy remains relevant but should be reviewed to refer to the Central Scotland Green Network.	Review and amend
C4	Protection of Potential Areas of Open Space	This policy protects areas of land that are not subject to Policy C3 but that have significant actual or potential value as open space.	Yes this policy remains relevant but could be considered to be amalgamated with Policy C3.	Review and amend
C5	Change of Use of Public Open Space to Garden Ground	This policy allows the change of use of public open space to private garden ground provided it would not result in an unacceptable loss of visual/recreational amenity, or harm a landscaping scheme, or set an undesirable precedent which could do.	Yes, this policy remains relevant.	Retain
C6	Rights of Way	This policy states that the Council will assert rights of way and bridleways and keep them free from obstruction.	Yes, this policy remains relevant.	Retain
C7	Core Paths and Other Routes	This policy states the Council's intention to develop a network of Core Paths. It requires new development to ensure that the overall integrity of the network is maintained and where possible improved through planning conditions or legal agreements.	This policy remains relevant but should be reviewed to refer to Central Scotland Green Network and to consider whether safeguards for possible path routes should be included in the LDP.	Review and amend
C8	Musselburgh Lagoons	This policy promotes the retention of the Musselburgh Lagoons for recreational use. It also states the Council's support for further development of and improvements to Musselburgh Racecourse and Old Golf Course.	Yes, this policy remains relevant but should be reviewed to update the fact that the coal fired Cockenzie Power Station has now closed.	Review and amend
C9	Prestongrange Museum	This policy states the Council's support for the enhancement of the Prestongrange Museum as a historic tourism, visitor and educational resource.	This policy remains relevant but requires to be reviewed to include the specific uses that would be acceptable within the museum grounds. The area covered by the museum on the Proposals Map requires expansion to include its full	Review and amend

			extent.	
C9a	Museum of Flight, East Fortune	This policy states the Council's support for the further development of the Museum of Flight, and the preparation of an overall masterplan.	Yes, this policy remains relevant.	Retain
C10	Health Care Sites	This policy supports the continued use of land currently occupied by public health care facilities. It only supports change of use if the Council, in conjunction with NHS Lothian is satisfied that the existing use is no longer required and its loss would not prejudice the availability of land for health care in East Lothian.	Yes, this policy remains relevant.	Retain
C11	Residential Care and Nursing Homes – Change of Use	This policy only permits change of use of residential care or nursing homes where the Council is satisfied that the loss would not harm the residential care interests of the people of East Lothian, or there is no prospect of the care or nursing home continuing as a viable concern (to be evidenced by the applicant).	Yes, this policy remains relevant.	Retain
C12	Residential Care and Nursing Homes – Location	This policy sets out the factors that should be taken account of in the selection of a location for new residential care/nursing home facilities, for example ensuring it is in an accessible location close to local services.	Yes, this policy remains relevant.	Retain
<b>Transportation</b>				
T1	Development Location and Accessibility	This policy requires new development to be located on sites that are capable of being conveniently and safely accessed by public transport, on foot and by cycle as well as private vehicle. It only permits exceptions to this where there is an operational requirement for a location which does not meet the terms of the policy, or where there are overall planning benefits to be gained.	Yes, the policy remains relevant but requires review to clarify the size of development the policy applies to. A policy which supports new development in locations that can be accessed by a range of sustainable transport modes will be required. Should be reviewed to reflect Scottish Planning Policy and to include a reference to active travel.	Review and amend
T2	General Transport	This policy requires new development to have	Yes, a policy is required which ensures	Review and amend

	Impact	no significant adverse impacts on road safety, public transport operations, road network capacity and residential amenity.	new development does not have adverse consequences for road safety, local road capacity, public transport accessibility and the opportunities for safe and convenient travel by walking or cycling. Review for clarity and to include a reference to potential for roads to sever connectivity for habitats and species.	
T3	Dunbar Railway Station	This policy states the Council's support for improvements to Dunbar Railway Station including increasing car parking provision and improving pedestrian access.	Yes, the policy remains relevant	Retain
T4	Longniddry-Haddington Route Safeguard	This policy safeguards the former Longniddry-Haddington railway line for future public transport use and states that it will be retained in use as a cycle—walkway route during the Local Plan period.	Yes, this policy should be retained but could be amended to reflect its role as an active travel route. Safeguarding could be extended (see C7 above).	Retain
T5	Public Parking	This policy supports the provision of short stay car parking where it will contribute to the vitality and viability of town centres. The policy only supports long stay car parking on sites away from town centres and next to public transport nodes.	Yes, this policy remains relevant.	Retain
T6	A1 Trunk Road – Roadside Facilities	This policy permits a maximum of two additional roadside facility developments on the A1 corridor in East Lothian, and sets out the criteria that such facilities should meet in terms of facility provision. A supermarket proposal has been permitted at the Oak Tree junction site and it therefore it is no longer considered suitable for a roadside serve facility.	Yes, this policy remains relevant.	Retain
<b>Development Policies</b>			<i>These are effectively 'Development Management' policies intended to help</i>	

			<i>secure the best quality development proposals. Most of these policies will be reviewed to ensure consistency with national design policy issued since 2008 and included in Supplementary Guidance.</i>	
DP1	Landscape and Streetscape Character	This policy requires new development to respond to and respect its surroundings, streetscape and landscape character.	Yes, the principle of this policy remains relevant and is required for the LDP. Review this policy and DP2 together to ensure that all new development respects and responds to its context and clarify the scale at which the policy should be applied; consider separation into a policy on street design, including streetscape and one on the design of green infrastructure/networks within development (suggested by SNH).	Replace with a revised new policy
DP2	Design	This policy requires a high standard of design in new development and contains a number of design criteria against which proposals are judged.	Yes, the principle of this policy remains relevant, is applicable to all new structures and buildings and is required for the LDP. . Given the emphasis on Designing for Place the policy should be comprehensively reviewed along with DP1 and incorporated into a new policy that incorporates guidance in Designing for Streets and Green Infrastructure; design and placemaking . DP1 could consider street design and green infrastructure within development, DP2 could be broadly themed around place design.	Replace with a revised new policy
DP3	Housing Density	This policy requires new strategic housing sites to achieve a minimum density of 30 dwellings per hectare (net) by using a range of densities, house types and sizes. On other local housing sites the policy also requires this density however identifies that in some cases lower	Yes, policy guidance relating to density should be included in the LDP. Review in light of SPP which requires the density of development to be determined in relation to the character of the place and to be varied where appropriate. Review	Review and amend

		<p>densities will be permitted if they more appropriately reflect local townscape and landscape character.</p> <p>Applying this policy to some of the allocated strategic housing sites has proved problematic, as the stated maximum capacities for the sites in the Local Plan has not been consistently aligned with the average minimum density requirement.</p>	whether to alter the minimum density requirement, possibly to include a higher density target.	
DP4	Design Statements	This policy sets out when Design Statements are required with applications. This is however now set out in The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013. This adds additional criteria not listed in the current Local Plan policy but also omits certain types of development currently required to provide them in the Local Plan.	Yes, but only if the Council wish to require design statements for types of development not currently covered by the 2013 Regulations, for example development that affects the setting of a listed building.	Review and consider deletion.
DP5	Major Development Sites	This policy requires the submission of masterplans for strategic housing and employment sites and sets out the requirements for them.	Yes, a policy requiring comprehensive masterplans for strategic development sites will be required. It should be reviewed to ensure consistency with national policy and guidance that has been released since the adoption of the Local Plan, e.g. Scottish Planning Policy, Designing Streets, Green Infrastructure to ensure that it achieving sustainable economic growth.	Review and amend
DP6	Extensions & Alterations to Existing Buildings	This policy sets out design criteria for alterations and extensions to existing buildings and is heavily used	Yes, a policy relating to the design of alterations and extensions will be required. Review existing wording to ensure it allows for contemporary extensions as well.	Review and amend
DP7	Infill, Backland and	This policy sets out the criteria against which	Yes, this policy remains relevant.	Review and amend

	Garden Ground Development	proposals for infill, backland and garden ground development will be judged, in order to ensure this type of development does not compromise the character and amenity of existing residential areas.	Requires to be updated and made clearer.	
DP8	Replacement Windows	This policy sets out the requirements for replacement windows in listed buildings, within Conservation Areas and outwith Conservation Areas in order to ensure that changes to windows do not adversely affect local character.	Yes, this policy remains relevant but requires review and updating to take account of changes to permitted development rights.	Review and amend
DP9	External Security	This policy seeks to ensure that security measures are sensitively integrated into buildings by setting out criteria explaining what types and styles of security measures are considered acceptable.	Yes, this policy remains relevant.	Retain
DP10	Advertisements	This policy sets out the design standards that are required in relation to advertisements, in order to ensure they are appropriate in style and form to the building and local area, with more strict controls on adverts within Conservation Areas.	Yes, the policy remains relevant. Additional guidance is required in the form of a Shopfronts Design Guide.	Retain
DP11	Roadside Advertisements	This policy sets out the criteria for assessing proposals for roadside advertisements in the countryside, to ensure they do not harm the amenity and character of the area or compromise road safety.	Yes, the policy remains relevant.	Retain
DP12	Biodiversity Assessments	This policy sets out requirements for biodiversity assessments.	Yes. Requires review to take into account the Council's Biodiversity Duty and the CSGN. Consider amalgamation with DP13.	Review and amend
DP13	Biodiversity and Development Sites	This policy seeks to minimise the impacts on biodiversity from developments, but only refers to development where biodiversity assessments are required.	Yes; consider combining with DP12 and together take a more positive and proactive approach to take account of the Council's biodiversity duty, and amend to refer to the contribution of biodiversity enhancements to the green	Review and amend

			networks and multi-use landscaping. This could also be covered by Supplementary Guidance on the CSGN.	
DP14	Trees on or adjacent to Development Sites	This policy seeks the protection of trees and their incorporation into new development sites.	Yes, although could be part of a wider biodiversity/green networks policy. The British Standard referred to in part 2 has been updated to British Standard 5837_2012 "Trees in relation to design, demolition and construction - Recommendations". Clarify policy requirements.	Review and amend
DP15	Sustainable Urban Drainage Systems	This policy sets out the requirements for Sustainable Urban Drainage Systems in new developments.	Yes, the LDP should have a policy on SUDs but this requires review to reflect the wider benefits of SUDs e.g. in contributing to green networks and biodiversity enhancement and to clarify where SUDs are required under the CAR regulations (i.e. all development proposals except single dwellings or direct discharges to coastal water). Supplementary Guidance will be used to expand on the policy by setting out details of the level of SUDs treatment that will be required for different types of development, and to ensure sufficient space for SUDs is safeguarded in site layouts. This SG will acknowledge the wider benefits of SUDs and promote the integration of SUDs as part of green infrastructure and placemaking on development sites, as well as highlighting links to water environment objectives within the Water Framework Directive and associated River Basin Management Plans.	Review and amend
DP16	Flooding	This policy restricts new development in the	Yes, though the policy will need review to	Review and amend

		areas of highest flood risk and sets out various criteria to ensure new development does not increase flood risk.	reflect new SEPA flood risk categories. SEPA also recommend that the policy refers to additional guidance on freeboard, and allowances for climate change and access and egress. It should also refer to the need to prevent deterioration of the water environment resulting from new development and where possible enhance this. Reference should be made to the Flood Risk Management (Scotland) Act 2009. Include reference to SEPA's Land Vulnerability Guidance to replace reference to SPP7 in Criterion 3. A safeguard for areas that will reduced flood risk should be included.	
DP17	Art Works - Percent for Art	This policy requires significant new development to incorporate artwork. This policy has been successful in securing a significant amount of new public artwork in developments across East Lothian.	Yes this policy remains relevant.	Retain
DP18	Transport Assessments and Travel Plans	This policy requires transport assessments for development proposals that are likely to generate a significant number of trips or have a significant impact on the transport system.	This policy is no longer required in the LDP as the need for Transport Assessments and Travel Plans will be assessed during the determination of planning applications. Reference can be made in supplementary guidance.	Delete
DP19	Transport Infrastructure Standards	This policy requires new roads, footways, paths, cycleways and public transport facilities to be constructed to the standards set out by the Council so they can be adopted.	This policy would be better placed as part of supplementary guidance and is not required.	Delete
DP20	Pedestrians and Cyclists	This policy requires new development to be designed in a way that makes walking and cycling as attractive as possible.	Yes, a policy requirement for new development to support and encourage walking and cycling should be included but does not necessarily need its own separate policy e.g. could be part of a	Review and amend

			wider policy on design, and should make reference to green networks.	
DP21	Public Transport	This policy requires new development to be designed in a way that maximises the use public transport, by maximising convenient access to facilities.	Yes, a policy requirement that development should be designed to encourage the use of public transport, but as with Policy DP20 this could be part of a wider design policy.	Review and amend
DP22	Private Parking	This policy requires new development to conform to the Council's adopted parking standards.	Yes, a policy requirement that development should be designed to accommodate private parking in accordance with parking standards transport, but this could be part of a wider design policy. Should also make reference to the Design Standards for New Housing Areas and its requirement to minimise the visual impact of car parking in new housing developments.	Review and amend
DP23	Waste Minimisation, Separation, Collection and Recycling	This policy requires new development to incorporate facilities for the minimisation, separation, collection and recycling of waste.	Yes, a policy that ensures new development helps manage waste will help contribute to Scotland's Zero Waste Plan. Consider SEPA suggestion that LDP should promote the use of site waste management plans to reduce construction and demolition waste.	Review and amend
DP24	Home Zones	This policy requires Home Zone principles to be incorporated into the design and layout of all new housing developments.	Yes, the promotion of home zones is still relevant however it may be better placed in supplementary guidance in relation to a wider design policy.	Retain

288. New planning policies to be included in the ELLDP are listed in the Table below:

	<b>Title</b>	<b>Purpose and scope of policy, and comments on its implementation/impact.</b>
1	Air Quality	This policy will be a generic policy covering air quality to ensure that that new developments do not have an adverse impact on air quality through the exacerbation of existing air quality problems or the introduction of new sources of pollution where they would impact on sensitive receptors.
2	Protection of Battlefields	A new heritage designation has been introduced with the National Inventory of Historic Battlefields. Inventory battlefields are a material consideration in the determination of planning applications and Scottish Historic Environment Policy states that planning authorities should extend protection to battlefields with appropriate policy in the development plan. Battlefields policy may benefit from being the subject of supplementary guidance which would allow issues such as protection, celebration, community interests and commemoration to be addressed.
3	Countryside Around Towns	The purpose of a Countryside Around Towns policy is to protect the most sensitive landscapes around settlements within East Lothian but outwith the designated Green Belt from development except in exceptional circumstances. Whilst the policy will be applicable in principle to all settlements it will not be appropriate for all settlements and will be used only where it can be justified; such justification might include the prevention of coalescence; to protect a key landscape setting and provide for green networks.
4	Designation of Local Geodiversity Sites	Geodiversity Sites are currently being identified through an audit and it is intended that sites accepted as Geodiversity sites will be given similar protection to Local Biodiversity Sites. Sites will be considered for designation once the audit is complete. This is not a new policy but the process will identify and give protection to local geodiversity in identified sites, which has not previously been covered by the Local Plan.
5	Special Landscape Areas (to replace Areas of Great Landscape Value)	A review is currently being undertaken with the aim of identifying Special Landscape Areas in line with guidance from SNH/Historic Scotland. Protection for valued local landscapes is not a new policy (AGLV's are currently covered by Local Plan Policy NH4) however the methodology used to identify locally valued landscapes has changed, and the areas given protection are likely to change as a consequence.
6	Gypsy /Travellers	Scottish Planning Policy requires development plans to address the housing needs to sections of the community such as Gypsy/Travellers and travelling showpeople. A criteria based policy will be introduced to allow proposals for such sites to be consistently assessed against a relevant policy, covering matters of landscape impact, residential amenity, servicing, and access to community facilities and the main road network.

7	East Linton Station Safeguard	This policy is required to safeguard land proposed for a railway station at East Linton which is supported by East Lothian Council but which to which there is no current commitment.
8	Energy including Renewable Energy	<ol style="list-style-type: none"> <li>1. Spatial Framework for Wind: include policy referring to Spatial Frameworks for Wind (relates to review of Policy NRG3).</li> <li>2. Heat networks: policy will be included to give support to the development of heat networks, including provision for retrofitting where appropriate, with the aim of encouraging their introduction. This will include support of district heating and CHP in large scale development sites as well as use of heat from renewable sources and waste heat.</li> <li>3. Location of energy-related infrastructure; a policy will be included to covering infrastructure such as electricity substations and new grid connections, with the aim of guiding this to suitable locations.</li> <li>4. Renewable Energy Technologies other than wind. Specific policy on other forms of renewable energy, currently assessed against whole plan policies, will be considered.</li> <li>5. Consented Gas Pipeline Route Safeguard: introduce a safeguard for the consented gas pipeline to Cockenzie Power Station with the aim of preventing development which may conflict with this use (if still relevant at the time of the proposed plan).</li> </ol>
9	Low and Zero Carbon Generating Technologies (LZCGT) in New Buildings	Include policy covering LZCGT in new buildings with the aim of reducing CO <sub>2</sub> emissions from new built development. The policy would refer to Supplementary Guidance.
10	Extraction of Shale Oil of Gas	Policy will be developed to cover extraction of Shale Oil and Gas, with the aim of minimising the impacts.
11	Waste Water	SEPA requires an additional reference to the need for new developments to connect to the public sewer. Criteria should be outlined to cover private treatment systems. It will also ensure new development can be served by an adequate water supply and will promote water conservation measures (to reduce the impact of new development in terms of water supply and support climate change adaptation). Advice on the latter could be included within SG on design of new developments. For large-scale proposals in areas where drainage is already constrained or problematic, or if there would be off-site effects, a comprehensive drainage assessment will be required, covering both surface and foul water
12	Soils	Policy will be developed to minimise the impact of development on high quality or rare soils.

## Key Findings from Policy Review

289. Most policies remain relevant and can be rolled forward in some form into the East Lothian Local Development Plan. Opportunities will also be taken to amalgamate a number of planning policies. To ensure that the ELLDP is a concise document much of the supporting detail for planning policies will be provided as supplementary guidance and areas for supplementary guidance are highlighted. There are a number of areas where new policies will be required and these are also identified.

## *Key Issues for ELLDP: General Approach and Policy Review*

- Taking account of the planning system reforms and the resultant requirement for LDPs to be concise, map-based documents, with detailed policies and minor proposals moved to supplementary planning guidance
- Incorporating new duties placed on planning authorities through legislation introduced since the adoption of the Local Plan
- Introducing new policies to address emerging issues that require policy guidance

## Future Monitoring Framework

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290. To monitor the changes in the principal physical, economic, social and environmental characteristics of the area, a number of indicators will be defined. These indicators will divide into two categories: 'contextual' indicators and 'plan monitoring' indicators. Firstly, contextual indicators; those that provide an overview of the physical, social and environmental characteristics of the area and effectively paint a portrait of the area and the context in which the Council's planning policies operate. The Council's development plan and planning policies may have some influence over a number of these characteristics however most are an outcome of a combination of many different factors and influences. Much of this information is likely to be available in sources such as the East Lothian Profile.
291. Secondly, 'plan monitoring' indicators; these will monitor the characteristics that are more directly affected by the Council's development plan and planning policies, and are considered to give an indication of how well the existing plan has performed in meeting its objectives.
292. The aim is to tie in monitoring indicators with those in the Strategic Environmental Assessment, the Council's Single Outcome Agreement, and the objectives of the ELLDP.

## APPENDIX 1

Proposed amendments to local biodiversity sites, showing the alterations between Local Wildlife Sites and Local Biodiversity Sites.

Site	Changes	Reason for change
<b>Entirely New Sites</b>		
Bearford Burn	New Site, and tributary of the Tyne	Watercourse flowing through good grassland habitat
Bilsdean Coast	New Site	Good coastal habitat
Birns Water	River valley with woodland and scrub habitat	To link Lammermuirs and Saltoun Forest
Cuddie Wood	extension to Butterdean	Forms a sizeable extension to Butterdean and has good woodland flora including common wintergreen
Fawn and Speedy wood	New site	This is a relatively large woodland area, and forms part of the wider woodland network comprising Yester and Bolton Muir.
Glen Burn	Wooded burn valley, opening onto coastal grassland	Popular woodland walk, with good quality grassland habitat
Gullane Bents	Coastal grassland and sand dune habitat justify designation	Good quality habitat linking SSSIs to west and east.
Lammermuirs	A large site that includes the former Monynut Water, Whiteadder, Faseny Water, Bothwell Water, part Colstoun Water.	This site contains the largest accumulation of priority habitat in the county and links existing Wildlife Sites and SSSI's.
Levenhall Links	Formerly Musselburgh Shore and Lagoons. This site excludes the SSSIs and incorporates Morrison's Haven and shore	To remove higher level designation and incorporate other areas of wildlife value.
Longniddry Bents	Excellent coastal sand dune habitat	An anomaly that this site was not designated previously
Oak Wood	A semi-natural woodland, forming an extension of Binning Wood	Part of the wider woodland network in this area
Phantassie Quarry Pond	New Site	Good wetland habitat
Traprain Grasslands	New Site, comprising six individual grassland sites	Good grassland habitat
<b>Amendments to existing Sites</b>		
Spott Burn, Dry Burn, Tyne, Biel Water, Bearford Burn, Gifford Water, Bellyford Burn, and other watercourses	Alterations to boundaries to reflect neighbouring semi-natural habitat, sometimes incorporating significant areas of land, but excluding	Previously it was not possible to map these sites with any accuracy. GIS technology has since improved to allow this to be done. The boundaries

	productive arable and commercial forestry where possible	now follow the watercourse and semi-natural habitat on either side. These sites are larger than previously mapped (though parts have been deleted) to reflect the natural character of the watercourse and its immediate surroundings.
Lennoxlove, Yester, Dunglass, Gosford and Tynninghame Estates	Alterations to boundaries	These were previously mapped to the estate boundaries. The LBS boundary removes the productive agricultural and forestry land from the sites
Balgone Loch	Amended	Garden ground removed from the site.
Baro Wood	Minor alteration to boundary	Mapping issue
Bilsdean Gorge	Reduction in area and incorporation into Bilsdean Coast	Mapping issue
Bolton Crossroad verges	Incorporated into Bolton Muir Wood	Mapping
Bolton Muir Wood	Minor alteration to boundary and incorporation of Bolton Cross Roads	To remove farmyard.
Bothwell Water	Incorporated into Lammermuirs	
Brunt Valley	Minor alterations to boundary	Mapping
Butterdean Wood	Extension to include Cuddie Wood	As above
Carberry Estate	Alterations and expansion of site	Some buildings removed and expansion to include Carberry bing.
Cauld Burn	Expansion of boundaries and incorporation into Thornton Burn Valley	Mapping
Colstoun Water	Expansion, notably at Beugh Banks Dalgowrie Braes	Good quality woodland and woodland flora
Colstoun Wood	Unchanged	
Costerton and Fala Woods	Amended to remove area of commercial forestry and inclusion of Keith Water	Removal of area with little wildlife value, but inclusion of riparian habitat and link with Humbie Woods.
Cowpits Wood	Expanded to include Smeaton Glen	Further areas of priority habitat included
Donolly Reservoir	Expansion	Further areas of semi-natural habitat included to link with Danskine Loch SSSI
Dunglass Gorge	Minor alteration to boundary	To remove productive land

Faseny Water	Incorporated into Lammermuirs	
Glen Wood	Minor alterations to boundary	To remove commercial forestry
Hailes and Howkins Wood	Incorporated into Traprain Grasslands	Site expanded to include larger area of neighbouring grassland habitat. More appropriate to consider this site with other grasslands at Traprain
Humbie Water	Minor alterations, although larger area of land at Linn Dean incorporated within boundary. The Linn Dean area is distant from other Humbie Water Sites so has been re-named Linn Dean Water	to incorporate semi-natural habitat, especially at Linn Dean
Humbie Wood (north)	Minor boundary changes	To reflect semi-natural habitat
Humbie Wood (south)	Minor boundary changes	To reflect semi-natural habitat
Longniddry to Haddington Railway	Minor boundary changes	To reflect semi-natural habitat
Monymut Water	Incorporated into Lammermuir site	
Musselburgh Shore and Lagoons	Amended to remove SSSI designation and formal sports area. Site re-named Levenhall Links and expanded to include Morrison's Haven area.	Part of the Firth of Forth SSSI
North Berwick Reservoir	Minor boundary changes	To reflect woodland habitat
Nunraw Glen	Amendment of boundaries	To incorporate riparian woodland and link with Lammermuirs.
Ormiston to Gifford railway	Expanded to incorporate Newhall Woodland and Newhall Burn	To include neighbouring semi-natural habitat
Petersmuir Wood	Unchanged	
Pressmennan wood	Minor amendment	Removal of garden ground
Puddle wood	Unchanged	
Redhouse Dean	Minor amendment	To reflect new field boundary
River Esk	Unchanged, but see Cowpits Wood	
Saltoun Big wood	Minor additions, to reflect the network of semi-natural habitat, inclusion linkage with the Lammermuirs via the Birns Water	To reflect semi-natural habitat

Sheriff Hall Grassland	Expanded slightly to include neighbouring woodland. Should be considered in conjunction with Balgone Loch	To incorporate surrounding semi-natural habitat
Spittal to Gullane Railway	Part of the site at Spittal deleted. Remainder of site expanded to include Peffer Bank Wood.	The deleted part of the site has become farmland. Remaining site has some wildlife value, and serves as a habitat link on the edge of a strongly arable landscape.
Thornton Glen	Minor amendment to incorporate Innerwick Castle. Site now considered part of wider Thornton Burn site.	To include important heritage and lichen site.
Waughton crossroads	Expanded, to include all roadside verges at crossroads, and part of a field edge.	To reflect good quality grassland habitat.
Whiteadder Reservoir	Incorporated into Lammermuirs	Part of the wider mix of upland habitats.
<b>Deleted Sites</b>		
Maggie Waas Wood	Deleted	Insufficient wildlife value
Pilmuir Meadow	Deleted	Insufficient wildlife value



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