



LOCAL DEVELOPMENT PLAN 2

Site Assessment Methodology

East Lothian Council LDP2

OVERVIEW

- 1.** In line with the National Planning Framework 4 (NPF4) and Local Development Planning Guidance (May 2023) the Council continues its proactive engagement with stakeholders and is publishing a site selection methodology to help identify the most appropriate locations for sites that will support East Lothian Local Development Plan 2's (ELLDP2) development strategy.
- 2.** This methodology for site location and site assessment is based on NPF4 policies and embeds Strategic Environmental Assessments (SEA) requirements. It is designed to identify the locations and sites that would be preferable in land use planning and SEA terms for development. This assessment process will help inform the decision making for creating the spatial strategy of LDP2.

- 3.** To assist with the implementation of the Site Assessment Methodology East Lothian Council is undertaking a Call for Sites exercise to help us gather information about sites that could form part of this spatial strategy. Through the Call for Sites we are looking for sites for all aspects of the next spatial strategy including, but not limited to, housing sites required for East Lothian to meet the Housing Land Requirement, economic development sites, allotment provision, community growing space, cemetery sites or sites suitable for renewable energy developments. Although being carried out alongside the Evidence Report stage both the site appraisal and the site selection process is not for consideration until the Proposed Plan stage as there are no site proposals in the Evidence Report. The Scottish Government’s Local Development Planning Guidance (May 2023, paragraph 108) states: *“Detailed policies and site proposals should not be included in the Evidence Report. Detailed site appraisal will not be appropriate at the Evidence Report stage, but the authority could usefully establish a site appraisal methodology that will be used to appraise sites and inform allocations for the Proposed Plan. This could also be linked or ideally integrated with the approach to SEA assessment”*.
- 4.** For sites to be considered as forming part of the LDP spatial strategy the Council expects sites submitted to demonstrate how they conform with all the required criteria in the Call for Sites survey, taking into account that some criteria may not be relevant depending on the use proposed. In addition to this methodology, the Council will also apply professional judgement on site selection for the LDP2 development strategy.
- 5.** Delivering new development, especially housing will be very challenging in East Lothian in terms of environmental impact and financing. In applying the selection methodology, East Lothian Council will need to exercise judgement in assessing competing factors and selection criteria that will inform housing site selection and identification of any new sites. This will be needed in order to ensure that sufficient and the most sustainable/suitable land is allocated to meet the housing requirements for LDP2.
- 6.** The Scottish Government Guidance for development plans (May 2023) states that sites should not be rolled forward from one plan to the next. A review allows for new policies and information to be taken into account. East Lothian Council will apply the site selection methodology to allocated sites, or sites identified in the housing land audit, which do not have an extant planning permission at the time of assessment.
- 7.** Assessment of sites on the Buildings at Risk register and identified on the vacant and derelict land survey may be considered. Sites that have a planning consent, or are at minded to grant planning permission stage, will not be reassessed. The Council does not consider it appropriate to reassess such sites.
- 8.** Much of East Lothian is considered to be accessible rural areas. While there are already some small-scale allocations in LDP1, further small-scale, rural housing opportunities may be appropriate in settlements that perform less well from a local living or access to public transport perspective. Proposals at these locations should not be more than 10% of the existing settlement size. Such sites will still be subject to the other relevant criteria in the site selection methodology.

METHODOLOGY

9. Below is the summary of approach (steps 1-6) to be taken by the Council in the site assessment process:

- (1) Detailed site assessment (This will be undertaken for all sites that have completed the relevant call for sites information categories, and some existing allocations).
- (2) Identify areas to be potentially excluded from development due to designations*
- (3) Apply infrastructure assessment to identify areas of constraint/capacity+.
- (4) Apply assessment of 20 Minute Neighbourhoods/ Local Living.
- (5) Assessment of Deliverability.
- (6) Consideration of remaining sites as part of the development of the overall spatial strategy of the LDP2.

* The areas of designations may be changed though the development of the Proposed Plan spatial strategy. Information provided in the Evidence Report and alongside the Call for Sites is indicative in nature.

+ Capacity information provided in the Evidence Report may change during the development of the LDP due to wider considerations and this may impact on the suitability of sites.

Note: Through the above step 1, a range of matters will be applied in the detailed assessment. It will include consideration of factors and locations which will be subsequently addressed through steps 2-5.

The Council will not be committed to taking forward and including in LDP2 sites put forward to it through the “Call for Sites” exercise. As part of the LDP2 “Call for Sites” exercise contributors are free to submit sites across different locations in East Lothian. However, they should be aware of the process in this methodology document through which the Council is seeking to identify potential development areas.

In addition, it should be noted that submitting a site into the Call for Sites process does not mean it will be included in the final LDP spatial strategy, even if a site is successful in meeting the criteria in the Site Assessment Methodology. This particularly applies to housing sites as the level of the Housing Land Requirement is yet to be agreed and the number of additional housing sites required for LDP2 is undetermined.

Step 1 – Site information and detailed site assessment

10. A range of matters will be applied in the site information/detailed individual site assessment process. This is adapted from the Joint LDP Site Assessment and SEA Checklist produced by the Key Agencies. The assessment matrix will be used to assess individual sites and record effects. The detailed individual site information and site assessment criteria developed by the Key Agencies and adapted by the Council is closely related to the Strategic Environmental Assessment (SEA) site assessment process. East Lothian Council has added additional criteria to reflect coalescence, Countryside Around Towns and Green Belt matters, which were not in the original Key Agency methodology.

11. All sites for consideration in the LDP spatial strategy will be assessed, with the exception of existing sites with extant planning permission. This will include remaining existing sites and those submitted through the Call for Sites and those included in registered Local Place Plans.

12. The scoring system allows for a range of effects to be recorded, from significantly positive to significantly negative. It includes a comments section to help clarify the assessment and a mitigation/enhancement column to indicate any potential to minimise, restore or offset adverse effects, and maximise beneficial effects.

13. Following a site assessment process, the Council will apply professional judgement through Stages 2 -5 of the methodology and then on Stage 6, site selection for the LDP2 spatial strategy.

Step 2 – Identify areas to be potentially excluded from development due to designations. At this stage we will identify areas of environmental constraints where build development is unlikely to be acceptable.

- Areas designated as SSSIs, SPAs, SCAs, Local Nature Reserves, Local Biodiversity Sites, RAMSAR
- Areas of peatland and carbon rich soils*
- Ancient and semi-natural woodland
- Wetland Habitat
- Areas of prime agricultural land**, Countryside Around Towns (CATs) and Greenbelt***
- Country Parks
- Public parks and functional open space identified in East Lothian Council’s Open Space Strategy
- Areas in 0.5% annual exceedance probability (AEP) with climate change (2080) fluvial flood risk zone

* Such areas will be determined by reference to NatureScot mapping of peatland and carbon rich soil resources.

** East Lothian Council acknowledges the very often close and immediate proximity of prime agricultural land to East Lothian settlements. While professional judgement will need to be applied to this matter, the increased loss of prime agricultural land is a significant concern to East Lothian Council and it is also reflected by the inclusion of Policy 5 (Soils) in NPF4.

*** Areas used under this criteria will reflect any changes made though the development of the LDP Spatial Strategy.

Step 3 – Apply infrastructure assessment* to identify areas of constraint and capacity.

14. The infrastructure considerations at this stage are**:

- Education
- Water and drainage

15. For each of these infrastructure classes, assessment is based on understanding the quantity of available capacity, the impact of committed development, identification of any investment programmes, identification of constraints and the options for overcoming these constraints. The information will be sourced from discussions with, and evidence submitted by the infrastructure providers. The results of the assessment will identify levels of constraint using a traffic light system (RAG rating):

- Red = constrained with no deliverable solution identified
- Amber = constrained but with potential solutions depending on feasibility and funding
- Green = not constrained under current programming

*Application of criteria will depend on which use is being assessed e.g. Education will not apply to employment uses.

** Other infrastructure capacity assessments such as Health and Transport will be undertaken alongside the development of the Spatial Strategy in Step 6.

Step 4 – 20 Minute Neighbourhoods/ Local Living

16. 20 Minute Neighbourhoods/ Local Living: The Council has identified indicative 20-minute neighbourhood areas in East Lothian for its largest settlements. As part of the Step 4 analysis sites will be compared with 20-minute neighbourhood mapping to determine their accessibility to local services. Where proposals lie outwith an identified 20-minute neighbourhood area, the Council will take a judgement on the likelihood of new facilities or infrastructure being delivered in that location that would support Local Living. This will include any new facilities included in site proposals. New facilities must be included in the site viability assessment.

Step 5 – Assessment of Deliverability

17. One of the focuses of NPF4 is ensuring that proposals in the plan can be delivered and this will need to be reflected in the Delivery Programme for the next LDP. For housing it is a requirement of NPF4 for the LDP to allocate Deliverable Land to meet the 10-year Local Housing Land Requirement. This requirement extends to other sites such as employment where there is a demand that needs to be met over the lifetime of the LDP. As part of the Call for Sites exercise those promoting sites will be asked to show details of the timing for the delivery of the site and its viability. Information will also be sought about site ownership. This information will be used to assess viability and ensure that sites considered in the development of the Spatial Strategy can come forward as promoted.

Step 6 – Development of Spatial Strategy

18. Sites that have passed the previous stages in the assessment process will then be considered as part of the development of the LDP spatial strategy. Reaching this stage in the process does not mean a site will be included in the LDP2 as other considerations may come into play at this stage.

19. Some of the information used at this stage will come from the assessment carried out under Stage 1. Determining factors in the development of the Spatial Strategy and the potential inclusion of a site will include among other points:

- Level of Housing Land Shortfall;
- Level of Employment Land Shortfall;
- Level of remaining development in a given location; and
- Individual and cumulative impact on existing and planned infrastructure e.g. school capacities, transport, water, health, energy etc.

Topic – Water Related SEA topics – population and human health, material assets, climatic factors.	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/ conclusions
Could the proposal affect the condition of the water environment (water quality, physical condition, water resources, and the migration of wild fish)?	Flood risk and water management Blue and green infrastructure					
Does the proposal have a direct impact on the water environment (for example, result in the need for watercourse crossings or a large-scale abstraction or allow the de-culverting of a watercourse)?	Flood risk and water management Blue and green infrastructure					
Can the proposal connect to the public foul sewer?	Infrastructure first					
Can the proposal connect to the public water mains? If not, is there a sustainable water source that is resilient to the periods of water scarcity?	Flood risk and water management Infrastructure first					

For large scale developments, are there any private or public water supplies within 250m of the site which may be affected?	Infrastructure first					
Is the proposal at risk of flooding (from any source) or can its implementation result in additional flood risk elsewhere? If flood risk is not fully understood, a Flood Risk Assessment (FRA) should be undertaken. Specify which of the following flood sources are applicable: fluvial, pluvial, sewer, or groundwater.	Flood Risk and Water Management					
Could the development of the site help alleviate any existing flooding problems in the area?	Flood risk and Water management					

Topic – Biodiversity, Flora and Fauna Related SEA topics – soils, water, climatic factors.	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/ conclusions
Does the proposed site conserve biodiversity?	Biodiversity Natural Places					

Topic – Biodiversity, Flora and Fauna Related SEA topics – soils, water, climatic factors.	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/ conclusions
Does the proposed site facilitate the creation of nature networks and improve ecological connectivity?	Natural places Biodiversity					
International Designations - SAC/SPA, Ramsar, World Heritage Sites. To what extent will the proposal affect these sites including via connectivity?	Natural places Biodiversity					
National Designations To what extent will the proposal affect national designations?	Natural places biodiversity					
To what extent will the proposal affect other designations including locally important designations?	Natural places Biodiversity					
To what extent will the proposal affect Non designated – e.g. trees, TPOs, hedges, woodland, (including woodlands in the Ancient, Semi Natural and Long Established Plantation	Natural places Biodiversity					

Topic – Biodiversity, Flora and Fauna Related SEA topics – soils, water, climatic factors.	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/ conclusions
Woodlands inventory), and species rich grasslands?						
Protected Species–e.g. bats, otters, etc - can it be ascertained if protected species will be affected and will a site survey be required?	Natural places Biodiversity					
To what extent will local geodiversity sites or wider geodiversity interests that could be affected by the proposal?	Soils Natural places Biodiversity					
How will habitat connectivity or wildlife corridors be affected by the proposal – will it result in habitat fragmentation or greater connectivity?	Biodiversity Tackling the climate and nature crisis Forestry, trees and woodland.					

Topic – Climatic Factors Related SEA topics – population, human health, water, biodiversity, material assets, soils, air, cultural heritage, landscape	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/ conclusions
To what extent will the proposal promote and enable adaptation to climate change?	Climate mitigation and adaptation					
Can nature based solutions for climate change mitigation and adaptation be implemented within the site?	Climate mitigation and adaptation Infrastructure First Blue and Green infrastructure					
To what extent does the proposal maintain and enhance resilience of existing and planned grey and green infrastructure?	Climate mitigation and adaptation Infrastructure first Blue and Green infrastructure					

To what extent does the proposal have good proximity to services and good access to existing or proposed public transport and active travel network?	Climate mitigation and adaptation Infrastructure First.					
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Topic – Air Quality Related SEA topics – climatic factors, soils, population and human health	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/ conclusions
Could the proposal lead to Local Air Quality Management thresholds being breached in an existing Air Quality Management Area?	Climate mitigation and adaptation Health and Safety					
Could the proposal lead to the designation of a new Air Quality Management Area (AQMA)?	Health and safety					
Does the proposal introduce a new potentially significant air emission to the area (e.g. combined heat and power, an industrial process, large scale quarry etc.)?	Health and safety					
Will the proposal lead to a sensitive use being located close to a site with noise/odour issues or a site regulated for emissions to air by SEPA (e.g. new housing adjacent to a large manufacturing factory)?	Health and safety					

Topic – population and human health Related SEA topics – climatic factors, air, water, soils, material assets	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/ conclusions
Is the proposal within the vicinity of a major accident hazard site or major accident hazard pipeline?	Health and safety					
Will the proposal affect service infrastructure: Education capacity - Secondary School Catchment Area/ Primary school catchment area Health provision/GP capacity	Infrastructure First					
To what extent will the proposal affect the quality and quantity of open space and connectivity and accessibility to open space or result in a loss of open space?	Design, Quality and place Local living and 20 minute neighbour-hoods Blue and green infrastructure Play, recreation and sport					

<p>Does the proposal affect core path links or other key access networks such as cycle paths, coastal paths and rights of way?</p>	<p>Sustainable Transport</p> <p>Design, quality and place</p> <p>Local living and 20 minute neighbour-hoods</p> <p>Infrastructure First</p>					
<p>Does the proposal have the opportunity to incorporate new or enhance existing blue and/or green infrastructure providing multiple benefits such as enhanced biodiversity, management of surface water?</p>	<p>Blue and Green infrastructure</p> <p>Infrastructure First</p>					

Topic – Soils Related SEA topics – landscape, cultural heritage, water, biodiversity, flora and fauna, material assets.	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/ conclusions
Does the proposal make use of a brownfield site or contaminated and vacant and derelict land? If on a brownfield site, is the site naturalised?	Soils Brownfield, vacant and derelict land					
Are there any contaminated soils issues on the site and if so, will the option employ remedial actions to ensure the site is suitable for use (as defined in PAN 33)?	Soils					
Ground Stability Is there any evidence of mine workings or other stability issues and would this impact the sites developability.						

<p>Is the proposal on peat or carbon rich soils and could the development of the site lead to a loss of peat or carbon rich soils?</p>	<p>Soils Climate mitigation and adaptation</p>					
<p>Does the proposal result in the loss of prime agricultural land or land that is culturally or locally important for primary use as identified by the LDP?</p>	<p>Soils</p>					

Topic – Landscape Related SEA topics – climatic factors, air, water, soils, material assets, biodiversity, population and human health	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/ conclusions
Is the site suitable for development without overly changing its topography?						
To what extent will any designated landscape areas be affected, including local landscape designations?	Natural Places					
To what extent will any designated Countryside Around Towns (CATs) be affected by the proposal?	Natural Places					
To what extent will any Gardens and Designed Landscapes be affected by the proposal?						
Does the site avoid loss of Green Belt or other land important to avoidance of coalescence / preservation of settlement identity?	Green Belts					

<p>Does the proposal ensure that development does not exceed the capacity of the landscape to accommodate it (such as current settlement boundaries, existing townscape and character of surrounding area and its visual qualities)?</p>	<p>Natural Places</p>					
<p>To what extent will the proposal affect features of landscape interest including distinctive character of the landscape and the qualities of wild land?</p>	<p>Natural Places</p>					

Topic – Cultural Heritage Related SEA topics – Climatic factors, air, water, soils, material assets, biodiversity, landscape	NPF4 Policy Topic	Scoring pre- mitigation	Mitigation	Enhancement	Scoring post- mitigation	Comments/ conclusions
Does the proposal protect or enhance the site or setting of: <ul style="list-style-type: none"> • Scheduled Monuments • Listed buildings • Inventory battlefields • Inventory gardens and designed landscapes • Conservation Areas • Undesignated historic environment assets • Streetscapes and settlement patterns 	Historic assets and places Natural Places					

<p>Does the proposal promote or enable the retention, maintenance and sustainable use or re-use of historic buildings and infrastructure?</p>	<p>Historic assets and places</p> <p>Zero waste</p> <p>Infrastructure first</p> <p>Brownfield, vacant and derelict land and empty buildings</p> <p>City, town, local and commercial centres</p> <p>Rural development</p>					
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<p>Does the proposal:</p> <p>Support the repair and appropriate retrofit of historic buildings?</p> <p>Support the transition to green energy supply in historic buildings?</p> <p>Include adaptation measures to make the historic environment assets and places more resilient to the effects of climate change?</p>	<p>Historic assets and places</p> <p>Tackling the climate and nature crises</p> <p>Climate mitigation and adaptation</p> <p>Design, quality and place</p> <p>Infrastructure first</p> <p>Quality homes</p> <p>Flood risk and water management</p> <p>Rural homes</p>					
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<p>Does the proposal:</p> <p>Enable the historic environment to support creation of high-quality places and spaces?</p> <p>Promote sustainable, responsible tourism, recreation and cultural activity?</p>	<p>Tourism</p> <p>Culture and creativity</p> <p>Design, quality and place</p> <p>Play, recreation and sport</p> <p>Local Living and 20 minute neighbour-hoods</p>					
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Topic – Material Assets – Deliverability/ sustainability constraints Related SEA topics – climatic factors, air, water, soils, population and human health.	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/ conclusions
<p>Please provide clear evidence that the site or parts of the site can be delivered in the timescale of LDP 2 (2026 -36) or beyond 2036.</p> <p>A clear indication of when it would add to the supply is required. This should include a financial assessment of the viability of the site taking into account issues such as ground remediation and the availability of infrastructure. It is accepted that at this stage any planning obligations will be indicative and should be based the existing Developer Contributions Framework Supplementary Guidance</p>						
<p>Site aspect – does the site make best use of solar gain? Is the site protected from prevailing winds?</p>	<p>Design Quality and place</p> <p>Climate Mitigation and Adaptation</p> <p>Heat and Cooling</p>					

Is the site in an area of heat network potential or a designated Heat Network Zone (HNZ)?	Climate Mitigation and adaptation Heat and cooling					
Vehicular Access constraints or opportunities - Is the network capable of accommodating active travel, public transport, other shared modes, and private vehicle traffic generated?	Local living and 20 min neighbour-hoods Sustainable transport					
Can public transport be accessed easily from the site, (less than 10 min walk or cycle to a regular service)?	Local living and 20 min neighbour-hoods Sustainable transport City, town, local and commercial centres					
Does the proposal minimise demand for primary resources by reusing an existing building or previously developed land?	Zero waste					
For waste infrastructure and facilities (except landfill and EFW) does the proposal comply with the criteria listed in NPF4 policy 12 d)?	Zero waste					

<p>20 Minute Neighbourhood Assessment</p> <p>How many of the key services can be accessed by walking, cycling or wheeling from the site in 10 minutes (800m)?</p> <p>Please specify how many of these services and facilities are located within a 10-minute walking distance from the site boundary. Key services are the ones presented in the information accompanying the consultation. Not relevant for rural sites apart from access to public transport.</p>						
<p>Does the site provide opportunities to extend or enhance the services required to support 20-minute neighbourhoods. Any proposals for new services must be factored into the site viability information mentioned above?</p>						
<p>Can the main part of the settlement (town or local centre) be accessed in a safe sustainable manner?</p> <p>This would primarily be by foot or cycling.</p>						

only if high quality cycling infrastructure that adheres to the six core design principles of Cycling by Design						
Is there any community benefit potential from the site, eg could the site deliver modern apprenticeships or provision of community facility eg shop.						
Is the site suitable only for volume housebuilders or for small housebuilders and/or self-build or custom housing.						
Is any of the site suitable for or can be made available for self-build housing?						

