

Spatial Strategy and Infrastructure Topic Paper

ELC 006

Context:

NPF4 Policies: Policy 5 (Soils), Policy 13 (Sustainable Transport), Policy 18 (Infrastructure First), Policy 20 (Blue and Green Infrastructure), Policy 22 (Flood Risk and Water Management), Policy 23 (Health and Safety), Policy 24 (Digital Infrastructure), NPF4 Spatial Strategy, Regional Spatial Strategy

- 6.1. This section deals with the spatial strategy of LDP2 and all aspects of infrastructure that feed into the development of a spatial strategy for the proposed plan. It is key to how the future of East Lothian will be spatially managed in future. Infrastructure is defined here as the key aspects of spatial planning that require longer term modelling, forecasting and investment in order to ensure provision for future growth and change can be made. Section 15(e) of the Town and Country Planning (Scotland) Act 1997 (as amended) requires the Evidence Report to provide information on the *infrastructure of the district*. Issues included under this definition of infrastructure are: Transport (see separate Transport Topic Paper), Education, Health, Agricultural Land, Flood Risk and Water Management, Broadband, Gas and Electricity, Cultural Venues, Disused Railway Lines, Public Toilets and Water Dispensers.
- 6.2. Most of the subjects covered in this paper will form criteria in the assessment of sites, which will become the basis for which decisions can be made on the allocation of sites for different uses within the next LDP.
- 6.3. The Site Selection Methodology is included as ELC 060 as part of this Evidence Report.
- 6.4. Other subjects that will be used in the development of the LDP Spatial Strategy, including landscape, biodiversity and historic environment designations are covered in the Evidence Report through the Storymap and other Topic Papers.

LINKS TO EVIDENCE

ELC 024	NPF4 National Spatial Strategy – Regional Spatial Priorities (Central and South)
ELC 025	Interim Regional Spatial Strategy for Edinburgh and South East Scotland City Region
ELC 186a	A National Mission With Local Impact: Infrastructure Investment Plan for Scotland 2021-22 to 2025-26 (Scottish Government)

ELC 186b	Infrastructure Investment Plan for Scotland A Guide to Property Asset Strategy in the Scottish Public Sector (Scottish Government/Scottish Futures Trust)
ELC 186c	Land Capability for Agriculture in Scotland (John Hutton Institute)
ELC 349	Topsoil organic carbon concentration and Carbon and Peatland 2016 mapping Scotland's Soils (Scotland's Environment)
ELC 186d	The Scottish Soil Framework
ELC 027	Strategic Flood Risk Assessment for Evidence Report (August 2024)
ELC 304*	Strategic Flood Risk Assessment for LDP1
ELC 109	Sustainable Drainage Systems (SuDS) Supplementary Planning Guidance for Local Development Plan 2018
ELC 095	East Lothian Local Flood Risk Management Plan
ELC 266	Flood Risk Mapping (Scottish Environment Protection Agency)
ELC 098	Flood Risk and Land Use Vulnerability Guidance (Scottish Environment Protection Agency – (current consultation on Potentially Vulnerable Areas)
ELC 099	River Basin Management Plan for Scotland 2021-27 (Scottish Environment Protection Agency)
ELC 165	Water Classification Hubs (sepa.org.uk)
ELC 166	Sewers for Scotland 4th Edition (Scottish Water)
ELC 167	Construction Industry Research and Information Association (CIRIA) The SuDS Manual C753 (2015)
ELC 036	Dynamic Coast Dynamic Coast – Coastal Erosion in Scotland (CREW – Centre of Expertise for Waters)
ELC 169	Shoreline Management Plan for East Lothian (2002)
ELC 170	Scotland's National Marine Plan (Scottish Government)
ELC 171	Strategic and local capacity data on Wastewater Treatment Works and areas where investment may be required (Scottish Water)
ELC 172	East Lothian Health & Social Care Partnership: Primary Care Premises Strategy 2021 and Appendices 2024
ELC 040	East Lothian Joint strategic needs assessment 2022 East Lothian Health & Social Care Partnership: Integration Joint Board Strategic Plan 2022-25

ELC 174	East Lothian Health & Social Care Partnership: Commissioning Strategy 2022-25
ELC 328	LDP 2018 Technical Note 14 (Developer Contributions Framework)
ELC 427	Vacant and Derelict Land Survey 2023
ELC 177	Delivering Net Zero for Scotland's Buildings – A Consultation on Proposals for a Heat in Buildings Bill
ELC 178	Scottish Government New Build Heat Standard: Factsheet (New Build Heat Standard: factsheet - gov.scot (www.gov.scot))
ELC 046	Housing to 2040 (Scottish Government)
ELC 180	Our Changing Electricity Network - SP Energy Networks
ELC 182	East Lothian Council record of venues within the county (in Topic Paper)
ELC 183	Historic Environment Record (East Lothian Council Archaeology Service – John Gray Centre)
ELC 184	Local History Society – East Lothian Heritage
ELC 185	East Lothian Council record of public toilet facilities.

6.5. Also see the Key Evidence for LDP2 Spatial Strategy section of the Storymap.

SUMMARY OF EVIDENCE

6.6. The Spatial Strategy for the new Local Development Plan must be developed in accordance with National Planning Framework 4. The NPF4 provides a national spatial strategy for Scotland with six spatial principles:

- Just Transition
- Conserving and recycling assets
- Local living
- Compact urban growth
- Rebalanced development
- Rural revitalisation

6.7. Through applying these principles, the national spatial strategy will support the planning and delivery in three key areas:

- Sustainable Places
- Liveable Places
- Productive Places.

6.8. Across thirty-three topic specific policies, NPF4 aims to enable planning to address the climate crisis, nature crisis, and health/inequality. The importance of an infrastructure first approach is key to delivery, however this must be in line with the infrastructure investment hierarchy. The hierarchy states that existing infrastructure and service capacity must be used first before any new infrastructure is provided. Specifically related to transport, NPF4 highlights the need to use Transport Scotland's sustainable travel hierarchy, which promotes walking, cycling, wheeling, public transport and shared transport above private car use.

- 6.9. The NPF4 sets out eighteen National Developments throughout Scotland, with East Lothian falling within both the Central and South areas. National Developments within these areas must be taken into account when developing the spatial strategy for the next Local Development Plan. National Development no.5 Urban Sustainable, Blue and Green Surface Water Management Solutions, although on the border between the City of Edinburgh and East Lothian regions, has cross-boundary implications for the overall water management and blue/green infrastructure within the area. Continued work within the Edinburgh and Lothians Strategic Drainage Partnership (ELSDP), as well as localised water management solutions, will assist with the delivery of the objectives of this National Development.
- 6.10. National Development no.18 High Speed rail is indicated as a route through East Lothian, with an indicative strategic connection also shown roughly indicative of the A1 trunk road. Although the following National Developments fall outside of East Lothian specifically, due to their proximity, there is scope to take advantage of close links with neighbouring authorities, and to collaborate on large projects that benefit multiple areas. These include no.6 (Urban Mass/Rapid Transit Networks) and no.7 (Central Scotland Green Network).
- 6.11. The next LDP will also be informed by the Interim Regional Spatial Strategy for South East Scotland. This plan was developed in response to the Planning (Scotland) Act 2019 requirement, with six local authorities collaborating towards its preparation. Key priorities for East Lothian highlighted in the iRSS are the strategic sites in the west of the county including Blindwells, as well as the former Cockenzie Power Station site. It is also highlighted that there is a large amount of prime agricultural land in East Lothian, with brownfield sites to be prioritised. The focus of additional growth would be in the west/central area of the County, although care will need to be taken to ensure there is sufficient infrastructure capacity due to the new housing and changes to settlement patterns from the LDP 2018.

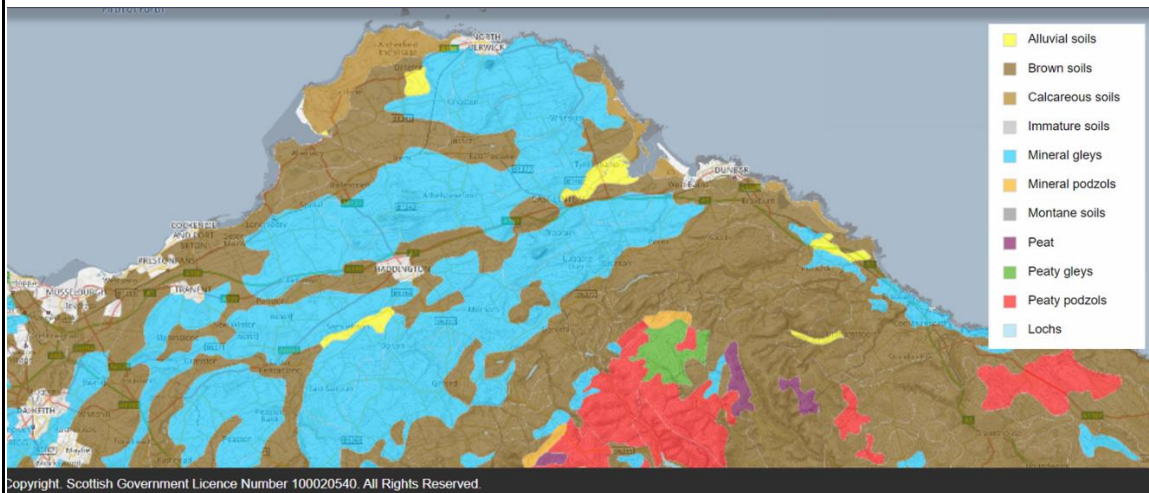
Safeguard Zones

- 6.12. There are several locations in East Lothian where it is important to consider the relationship between development and key pieces of infrastructure. These are mainly where there is a potential clash between development uses and the safe running of infrastructure. Within these zones the impact of proposed development on the infrastructure requires needs to be considered both at development plan and application stage. These zones are found around pipelines, energy facilities and aviation facilities. These zones can be found in page 1 of the Key Evidence for LDP2 Spatial Strategy in the Storymap.

Prime Agricultural Land and Soils

- 6.13. East Lothian is one of only a few parts remaining in Scotland that has an extensive area of particularly high quality prime agricultural land. Such land is classified into grades depending on quality. Much of East Lothian's agricultural land is located within the top three grades (these being Class 1, 2 or 3.1), with large areas being within the highest Class 1 designation. Prime agricultural land is considered the best growing land in Scotland because it is, in general, capable of being used to produce a wide range of crops, and the climate, slopes, soil depth and drainage conditions are all favourable.
- 6.14. NPF4 policy 5 (Soils) states that development located on prime agricultural land will only be supported where it is for (i) essential infrastructure with no other suitable location, (ii) small-scale development directly linked to a rural business, (iii) production and processing facilities associated with the land produce where no other local site is suitable, or for the generation of renewable energy or mineral extraction and where there is secure provision for restoration. The intention of policy 5 is to "protect carbon rich soils, restore peatlands, and minimise disturbance to soils from development." The map below taken from Scotland's Soils online mapping tool shows the location of various soil types in East Lothian.

- 6.15. This geographical characteristic of East Lothian means there is a limitation on the areas that can be considered for possible future housing and/or employment growth in the county. The map below (shown in more detail on pages 9 and 10 of the Key Evidence for Spatial Strategy part of the Storymap) shows the location and extent of prime agricultural land across East Lothian. The intention of NPF4 policy is for LDPs to safeguard prime agricultural land and minimise disturbance from development. However, in meeting the Housing Land Requirement (HLR), it is likely that some land will need to be allocated for housing—even where it includes prime agricultural land—due to the limited availability of brownfield sites and the fact that much of the land in East Lothian in appropriate locations is not of prime quality.



Scotland's Soils (https://map.environment.gov.scot/Soil_maps/?layer=1)

Education Capacity

- 6.16. Many educational facilities in East Lothian tend to operate close to or at full capacity. This means, in general, there is very little room to accommodate any substantial increases in new pupils without intervention.
- 6.17. As part of the LDP 2018, sites were allocated for residential development in a number of settlements where the education provision would need to be expanded to accommodate this growth. To do this, a combination of new educational facilities or the expansion of existing establishments was required, on the basis of school roll projections undertaken by East Lothian Council Education authority with contributions sought from developers towards this. New schools have subsequently been provided in locations including Letham Mains (Haddington) and Ravensheugh (Wallyford). Others including, Blindwells and Craighall completed 2025. Replacement, larger school at Whitecraig due in early 2026. New secondary at Wallyford opened 2023.
- 6.18. The Education Service has prepared new school roll projections for all schools taking into account operating capacity, which has been reviewed to ensure accuracy. The most up to date figures available are from November 2023 and are included as part of this Evidence Report.
- 6.19. This will provide a clearer understanding of the capacity for any growth. In addition to roll projections and school capacities related to existing allocated development sites, some of East Lothian's existing educational facilities are coming to the end of their operational life and will shortly need to be replaced. Others may need upgrading rather than total replacement. These, as well as brand new facilities, take time to deliver and there is a time lag due to the time taken to grant consent for development, construction, resultant occupation of houses and eventual operation of educational facilities.

6.20. Significant constraints related to educational capacity could impact upon the ability to designate new residential development sites in East Lothian. We continue to work closely with the Councils Education Service to align growth with this infrastructure need.

6.21. The Council is currently undertaking a review of the Education Estate which will consider the most appropriate manner to meet the education requirements of the county, while factoring in the cost of maintaining necessary capacity and ensuring that the finances available for school estate investment are most efficiency used. The end of Public Private Partnership contracts in several schools, which will come about towards the end of the LDP2 plan period will require to be taken into account in the spatial strategy. The table below provides details of the capacity and roll projections for each educational establishment in East Lothian as well as an estimated availability of capacity for each primary and secondary school in 2030, when sites allocated in LDP2 can be expected to be built out, and therefore could these schools accommodate additional development without additional capacity being added. Note that roll projections do change and this information will be updated during the preparation of the proposed to inform spatial strategy decisions in where additional allocations required to meet the HLR can be located.

Schools	Overall School Condition in 2023*	Suitability of school in 2023*	% Capacity in 2023 excluding planned extensions	Individual School capacity in 2023* including LPD1 planned extensions	2023 School Roll	Projected school rolls in 2030 based on Nov 2023 projections	Project Peak Roll Year	Peak Roll	Working capacity (@ 90%)	Projected ability of school to sustain further development using Traffic Light system @ 2030	Narrative
Dunbar Cluster											
Dunbar Grammar	B	B	93.4%	1199	1120	969	2024	1142	1079		
Dunbar PS John Muir Campus	C	B	74.4%	500	372	350	2029	400	450		ASN and Early Years additional provision to increase campus size.
Dunbar PS Lochend Campus	A	A	86.4%	669	578	506	2024	578	602		
East Linton	C	C	100.6%	175	176	162	2027	197	158		Capacity under review by ELC after unsuccessful Scottish Future Trust bid in 2023
Innerwick	B	B	61.3%	75	46	51	2031	51	60		
Stenton	B	C	36.0%	50	18	24	2028	26	45		
West Barns	B	C	76.0%	125	95	106	2026	112	113		
Overall Primary Capacity in Cluster				1594				1364	1435		
Haddington Cluster											
Knock Academy* (999 capacity prior to extension)	B	A	90.3%	1250	902	1025	2036	1158	1125		Extension to Knock Academy required by 2029 to increase capacity for 1250 pupils. There may be a design opportunity to extend this capacity further through the extension. Peak after 2030
Haddington PS Infants	A	B	78%	390	306	269	2023	306	351		
Haddington PS Upper	B	C	87%	504	438	376	2023	438	454		Require additional sanitary appliances to allow capacity to increase to 504 pupils.
Letham Mains* (current capacity 411)	A	A	34%	461	156	446	2032	454	415		Peak after 2030
Yester	B	C	76%	175	133	96	2023	133	158		
St Mary's RC PS	A	B	83%	125	104	122	2033	127	113		Peak after 2030
Overall Primary Capacity in Cluster				1655	1137	1329		1458	1490		
Musselburgh Cluster											
Musselburgh Grammar School	B	C	71.2%	1399	996	726	2023	996	1259		
Rosehill High School* (current capacity 850)	Opened 2023 therefore not rated in 2023.		33.2%	1250	315	873	2041	1128	1125		Peak reached after 2030 as housing development on going within catchment which will take up the remaining capacity in the school.
Camrie	C	B	81.5%	444	362	305	2023	362	400		
Musselburgh Burgh	C	C	77.2%	334	258	231	2023	258	301		
Pinkie St. Peters	B	B	66.7%	661	441	428	2025	458	595		
Stoneyhill	B	B	59.9%	309	185	145	2023	185	278		
Craighall*	Under Construction - In two phases.		0.0%	630	14	260	2040	547	567		Peak reached after 2030.
Wallyford* (815 current capacity)	A	A	56.0%	1158	456	728	2037	1030	1042		Peak reached after 2030.
Whitecraig* (125 current capacity)	C	C	83.2%	285	104	201	2035	261	257		Peak reached after 2030. Development permitted or allocated within this catchment will take up the remaining capacity. New school under development and will be opened 2025.
Loretto RC PS	B	C	80.0%	205	164	201	2036	216	185		Peak reached after 2030.
Overall Primary Capacity in Cluster				4026	1984	2499		3317	3623		
North Berwick Cluster											
North Berwick High	B	B	83.8%	1249	1047	1010	2024	1059	1124		Additional sports facilities required to potentially extend school capacity.
Aberlady*	B	C	84.0%	175	147	153	2026	159	155		Extension due to commence 2024-25
Athelstaneford	B	B	70.7%	75	53	49	2032	55	60		Requires additional sanitary appliances.
Orleton	B	B	91.7%	100	55	45	2023	55	90		Requires additional sanitary appliances to have school capacity up to 100
Gullane	B	B	67.8%	354	240	247	2027	264	319		
Law PS	B	B	75.1%	891	651	654	2023	651	802		
Overall Primary Capacity in Cluster				1595	1146	1148		1184	1436		

Prestonpans Cluster										
Preston Lodge HS* (current capacity 1099)	B	B	96.6%	1300	1062	1104	2037	1240	1170	Peak reached after 2030.
Blindwells*	Under Construction - In two phases.		0%	529	10	371	2035	503	476	Peak reached after 2030.
Cockenzie	B	C	71.1%	460	327	280	2023	327	414	
Longniddry* (current capacity 271)	B	B	50.1%	343	172	306	2032	335	309	Peak reached after 2030.
Preston Tower Lower Campus (West Loons)	C	B	72.2%	385	278	247	2026	291	347	
Preston Tower Upper Campus	B	B	84.9%	504	428	367	2024	435	454	
St Gabriel's RCPS	B	A	71.9%	217	156	155	2034	160	195	
Overall Primary Capacity in Cluster				2438					2194	
Tranent Cluster										
Ross High School	B	B	77.5%	1599	1240	1191	2023	1240	1439	
Elphinstone* (current capacity 60)	C	C	71.7%	100	43	60	2034	79	90	Peak reached after 2030. Current capacity is 60 to additional sanitary appliances which will allow school to have capacity for 75 pupils. As part of it was proposed to extend by one classroom and associated ancillary space increasing capacity to with the additional sanitary upgrades. Further residential application pending decision which require additional classroom (5 classrooms) and ancillary accommodation. Under review current and awaiting decision.
Humble	B	B	20.0%	50	10	13	2038	15	45	Require additional sanitary appliances to allow school to accommodate up to 50 pupils. Current building mothballed from August 2024 and pupils being hosted at Pentcaitland PS
Macmerry* (current capacity 175)	C	C	55.4%	200	97	187	2029	200	180	LDP Supplementary Guidance: Developer Contributions Framework, Technical Note 14- on additional classroom (25 additional pupil spaces GP space and additional dining and ancillary space)
Ormiston	C	B	105.7%	330	222	197	2024	230	297	Capacity reduced to 210 until additional sanitary appliances added then school roll increases to 31 pupils.
Pentcaitland* (current capacity 205)	B	B	71.7%	230	147	186	2035	202	207	Peak reached after 2030. Proposals to extend by classroom under consideration.
Saughton	B	C	30.7%	75	23	36	2032	39	68	Additional sanitary appliances required
Sandersons Wynd	B	B	75.8%	425	322	319	2035	361	383	
Windysgoul* (current capacity 758)	A	B	69.7%	To be determined.	528	660	2037	718		LDP Supplementary Guidance: Developer Contributions Framework, Technical Note 14 highlighted accommodation requirements based projected school rolls at that time. Overall additional nursery and primary requirement under review.
St Martins RCPS	B	B	65.9%	205	135	144	2030	144	185	
Overall Primary Capacity in Cluster				1615						
* Beside school name are schools with LDP1 planned extension estimated capacity. It should be noted these estimated additional school capacities will be reviewed and extension plans refined or changed based on updated educational data, Council strategies and policies, which may change overall capacity of the school.										
Traffic Lights System				Position in 2030						
				Over 20% capacity						
				Between 10-20% capacity						
				0-10% or none available as projected peak not reached until after 2030 therefore no spare capacity/ or						

* beside school name are schools with LDP1 planned extension estimated capacity. It should be noted these estimated additional school capacities will be reviewed and extension plans refined or changed based on updated educational data, Council strategies and policies, which may change overall capacity of the school.

Traffic Lights System				Position in 2030	
				Over 20% capacity	
				Between 10-20% capacity	
				0-10% or none available as projected peak not reached until after 2030 therefore no spare capacity/ or	

* Condition rating, suitability and current capacity information published by Scottish Government in Table 8: School Estates 2023- full school level dataset, noting that the school's capacity, condition and suitability may have changed in the intervening period.

	Require additional sanitary appliances to meet regulations.
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Additional Support Needs

6.22. The last 10 years has seen a large increase in the number of East Lothian pupils that require additional support needs. Around 40% of pupils require some sort of additional support. Often this will be accommodated in the existing teaching space but in some instances separate space will be required. Currently ASN support is not distributed evenly across East Lothian. During the development of the LDP this will begin to be addressed and will have an impact on the availability of spare education capacity across the estate.

6.23. Information on the location of schools, schools with ASN provision and capacity data is provided on pages 19 to 21 of the Key Evidence for LDP2 Spatial Strategy section of the Storymap.

Flood Risk

6.24. As our climate continues to change, flood risk is becoming greater in many parts of Scotland. This is an issue that affects East Lothian, with many miles of coastline and inland watercourses as potential sources of flooding. Managing flood risk requires both avoidance and adaptation. Flood risk can be related to coastal, river, or surface water. Flood mapping is included on page 12 of the Key Evidence for LDP2 Spatial Strategy section of the Storymap.

6.25. NPF4 policy 22 states that LDPs should strengthen community resilience to the current and future impacts of climate change by avoiding development in areas at risk from flooding as a first principle. Development in areas at risk of flooding will only be supported by NPF4 in very limited circumstances,

such as essential infrastructure. There is also a new requirement through NPF4 policy to ensure that where development utilises measures to manage flood risk rather than avoid it, additional protection for ground floors is required. Another important aspect of managing flood risk is ensuring that development does not increase flood risk elsewhere.

- 6.26. Whilst the avoidance principle and other ways to manage flood risk are not new planning requirements, there is a greater emphasis on LDPs to ensure that decisions on development take into account future flood risk using the most up to date information and predictions. There is also an increased need to ensure that developments are designed in such a way that ensures resilience to the effects of flooding, thereby reducing the likelihood of damage to buildings and allowing people time to escape in the event of a flooding issue.
- 6.27. Climate change, flooding and sea level rise predictions mean that certain areas that currently do not experience significant problems may also not be appropriate for development in the years ahead. The NPF4 requires LDPs to take into account future flood risk. SEPA's revised flood mapping shows that there are now some areas at greater risk from flooding than they were previously. This includes both in the short term but also in the longer term beyond the lifetime of the next LDP.
- 6.28. SEPA has provided updated guidance for developments with regards to climate change allowances and both assessing and designing for greater future flood risk resilience. This means that developers are now required to assess a 1 in 200-year flood event plus climate change annual exceedance probability (AEP). Depending on the sensitivity of the land use being proposed, there may be a requirement to do a higher level of assessment e.g. for schools or hospitals.
- 6.29. East Lothian has already begun work to address the flood risk in Musselburgh, which is one of the biggest potential sources and at-risk locations for flooding in the county. The Musselburgh Flood Protection Scheme (MFPS) is in the outline design stage and was formally notified in March 2024. It aims to provide protection from river and coastal flooding. The current outline design includes measures such as direct defences in the form of embankments and walls, bridge replacements, reservoir modifications, a debris trap, erosion protection and drainage works, amongst others.
- 6.30. As part of the LDP 2018 and the development of Blindwells (BW1) allocation, East Lothian Council developed draft Climate Evolution Supplementary Planning Guidance (SPG). The aim of this was to look at achieving benefits to the green and blue infrastructure environment within the Blindwells, Tranent and Port Seton areas, and associated regenerative benefits for these communities. At this point the SPG has not been formally approved and remains draft guidance, but its principles could potentially be factored into the development of the spatial strategy.
- 6.31. The next LDP will be prepared in close collaboration with Scottish Environment Protection Agency (SEPA) who have already been involved in the preparation of the Strategic Flood Risk Assessment as part of this Evidence Report. It will also be necessary to prepare a further Strategic Flood Risk Assessment (SFRA) for the plan, again in collaboration with SEPA and the Council's Flood Protection team.

Water Supply and Wastewater

- 6.32. Water supply and wastewater treatment capacity are key infrastructure requirements for any new development. Development must be managed to allow for network upgrades (where necessary) to be delivered to facilitate development. Existing communities may also benefit from upgrades as part of new development. New development must not create or exacerbate existing problems with the sewerage network or wider water environment, including taking into consideration future climate change predictions. Data available from SEPA in their Flood Maps and Water Classification Hubs will be used to inform future decisions on development location and interventions required.
- 6.33. Some parts of East Lothian, typically more rural locations, have limited capacity at the sewage treatment works. This is often due to the small scale of the treatment works serving only a small number

of properties. The North Berwick catchment has experienced growth as part of the LDP 2018 and is now at capacity. For further growth to occur in this catchment, a new wastewater treatment works is required rather than an extension to the existing works due to site constraints. Options for a new works are being considered by Scottish Water in discussion with East Lothian Council. This is in advance of a planning application submission.

- 6.34. At other locations where treatment capacity may be limited, investment by Scottish Water would allow for building in additional capacity at existing treatment works. Regardless of any solution chosen at any location, there is a time lag meaning these facilities require time to be built. Scottish Water will work with the developer to understand their plans so that new connections can be managed or phased whilst extra capacity is delivered. New houses must be connected to a wastewater treatment works, and this can make new residential development, particularly in more rural parts of East Lothian where only small treatment works exist to serve a small number of residential properties, more difficult to provide for. Whilst a septic tank can be a solution for single houses, the preference is always to connect to the main sewerage network where possible. Where a wastewater treatment works (WWTW) does not have capacity Scottish Water is funded for growth to increase capacity. There may be a period of time before strategic capacity can be fully delivered at a works. This should not delay a development if the developer engages early with Scottish Water.
- 6.35. Water supply is in general not a concern for the East Lothian area although larger development areas in the West, such as the innovation park at QMU, development at Cockenzie and potential development at Blindwells may be more challenging to accommodate in the short term. However, data will be monitored on an ongoing basis to ensure that, should any issues arise, we can work with Scottish Water to address them in relation to the development of land. It is advisable to check existing Scottish Water network assets before entering into land purchase. Any such assets could if large enough, such as strategic water or wastewater mains, pumping stations etc, prove financially restrictive to divert or remain in situ due to wayleaves or stand-off distances. Any restrictions regarding the location of water mains requiring a way leave will be checked in collaboration with Scottish Water. This is at both development planning stage and development management stage.
- 6.36. The next LDP will be prepared in collaboration with Scottish Water to ensure any matters relating to the capacity of the wastewater network can be addressed through specific policy, or within the design of future development sites. Mapping showing the location of water supply and waste water facilities and their capacities is provided on page 11 of the Key Evidence for LDP2 Spatial Strategy section of the Storymap.

Health and Health Facilities

- 6.37. Health facilities comprise of hospitals, general practitioners and dental care, and they are an essential part of infrastructure for all communities. East Lothian has 10 premises providing accommodation for 15 GP Practices. These comprise NHS owned primary care centres, NHS owned individual practice premises, practice owned medical centres and premises leased from private landlords. There are 18 premises providing General Dental Services and 2 locations providing Public Dental Service (East Lothian Community Hospital and Musselburgh Primary Care Centre). There are currently no General Dental Services in buildings which house other primary care services, in East Lothian.
- 6.38. A range of services are delegated to the East Lothian Health and Social Care Partnership (ELHSCP), which integrates health services delivered by NHS Lothian and social care services delivered by East Lothian Council. The ELHSCP have prepared the Primary Care Premises Strategy 2021 which contains information on how care services are delivered in East Lothian. Updates in the form of appendices for 2024 have been provided by NHS Lothian. The 2021 strategy remains largely up to date with the

exception of the Cockenzie Health Centre (Harbours Medical Practice) which has had an extension built and completed in 2022.

- 6.39. The East Lothian Integration Joint Board (IJB) governs the ELHSCP, and the most up to date information on overall service responsibility and future planning is contained within the IJB Strategic Plan 2022-25. The ELHSCP Commissioning Strategy 2022-25 sets out the approach to Strategic Commissioning, which is the assessment and forecast of current and future needs and the linking of investment to services to meet these needs.
- 6.40. The ELHSCP provides a range of services that were part of Primary Medical Services previously. These services are provided in two main hubs: East Lothian Community Hospital (Haddington) and Musselburgh Primary Care Centre, with some provided within GP practices.
- 6.41. The map below shows the dispersal of East Lothian's hospital and GP services. At a number of these locations, more than one GP surgery is located within the same building (e.g. Musselburgh Primary Care Centre, Newton Port Surgery Haddington etc.). The majority of services are provided within the northern part of East Lothian (north of the A1/East Coast Main Line) with the rural southern areas less well served. Access from these areas tends to require access to a private car rather than public transport.
- 6.42. There are currently 16 operational general practices. Over the last 10-year period, there have been some significant changes in the number of patients registered at practices, with some seeing a 30% increase. Others have only had minor increases. The table below shows the percentage change at each practice between 2012 and 2023.
- 6.43. The capacity of GP surgeries can relate to the physical size of the facility itself in terms of floorspace, but also by the number of GPs that work at each surgery and therefore the number of patients that can be managed. Page 18 of the Key Evidence for LDP2 Spatial Strategy part of the Storymap contains mapping showing the location of Hospitals and GP practices and the GP catchments.
- 6.44. East Lothian Community Hospital in Haddington is the newest hospital development in the county having opened in 2020. It is a modern development comprising various non-emergency services. The central location in Haddington means that it is in general easily accessible including by public transport. It provides care for all parts of East Lothian.
- 6.45. NHS Lothian have overall responsibility for planning for growth and ensuring services meet the needs of the population within East Lothian. Following the Scottish Government Budget on 19 December 2023, NHS Lothian was instructed to stand down the planning on the major capital projects, as well as stopping business case development for projects including the 27 Primary Care facilities. This included the East Lothian priorities.
- 6.46. Consultation with NHS Lothian and the ELHSCP will continue with regards to how to manage any growth that may come forward as part of LDP2, and the potential impacts on existing GP services and hospitals. NPF4 requires an infrastructure first approach, however certain health care services are already under pressure. One of the key issues will be how to align health care service provision with growth demand for new housing development. A joint approach is important between NHS Lothian, the ELHSCP and Property Asset Strategy and Management Plan. A review of service delivery is currently underway as part of the Place-making project (see also Design & Place-making chapter of the Evidence Report). Where lack of capacity is identified, this will be taken into consideration during the plan-making process in relation to site allocations and access to services. NHS Lothian also continue to provide advice on a case by case basis for planning applications at Development Management level. See Appendix 1 for GP data.

Brownfield and Vacant and Derelict Land

- 6.47. Within East Lothian, there are a number of sites within our urban areas that are part of the vacant and derelict land classification. These can be considered part of the infrastructure of East Lothian as they may have potential, at some point, to be useable development land. Some of the sites have certain constraints that need to be overcome, with cost for remediation works typically the main constraint.

- 6.48. East Lothian participates in the annual Scottish Vacant and Derelict Land Survey (SVDLS) with the most recent data being provided to the Scottish Government in November 2023. Currently, there are 32 sites on the register totalling just over 83ha. The full list of sites provided to the Scottish Government as part of the Scottish Vacant and Derelict Land Survey 2023 is included below.
- 6.49. NPF4 contains various policies to which vacant and derelict land has links with. Policy 9 is specifically intended to encourage the use of brownfield land, vacant and derelict land, and empty buildings. However, the principle of reusing vacant and derelict land and empty buildings can more broadly relate to sustainable development targets, climate change, conserving resources, and an overall reduction in waste through the circular economy.
- 6.50. As the sites included on the vacant and derelict land register are generally located within urban environments, they typically have good transportation links, are relatively close to other existing services, and importantly for employment use, they are often near potential workforce.
- 6.51. The development of at least some of these sites could therefore contribute towards overall targets within NPF4 regarding sustainable development, reuse of resources, protection of greenfield land, and potentially the 20-minute neighbourhood principle.
- 6.52. The next LDP will be prepared with the aim of finding ways to facilitate the reuse of vacant and derelict land and buildings in sustainable locations and will be prioritised over any greenfield development.

GASWORKS SITE	BALCARRES ROAD MUSSELBURGH EAST Lothian
TRANENT INFANT SCHOOL	SANDERSON'S WYND TRANENT EAST Lothian
FORMER COCKENZIE POWER STATION COAL STORE	LAND WEST OF B6371 COCKENZIE EAST Lothian
FORMER EDENHALL HOSPITAL	EDENHALL ROAD MUSSELBURGH EAST Lothian
FORMER COCKENZIE POWER STATION	EDINBURGH ROAD COCKENZIE EAST Lothian
FORMER COCKENZIE ELECTRICITY DISTRIBUTION SITE	EDINBURGH ROAD COCKENZIE EAST Lothian
EAST FORTUNE STEADING	LAND SOUTH OF B1377 EAST FORTUNE EAST Lothian
FORMER WALLYFORD PRIMARY SCHOOL	ALBERT PLACE WALLYFORD EAST Lothian
FA'SIDE LODGE	22A CHURCH STREET TRANENT EAST Lothian
TYNINGHAME LINKS STEADING	LIMETREE WALK TYNINGHAME EAST Lothian
DIRLETON NEW MAINS	EH39 5EN DIRLETON EAST Lothian
HARLOW HILL HOUSE	HARLOW HILL ROAD PRESTONPANS EAST Lothian
PINKIEHILL FARM	CARBERRY ROAD INVERESK EAST Lothian
PAPPLE STEADING	PAPPLE STEADING MORHAM GIFFORD EAST Lothian
31-33	SALTERS ROAD WALLYFORD EAST Lothian
PHANTASSIE STEADING	DUNBAR ROAD EAST LINTON EAST Lothian
FORMER HADDINGTON NURSERY SCHOOL	MEADOWPARK HADDINGTON EAST Lothian
HOPETOUN MEWS COTTAGES	HOPETOUN MEWS HADDINGTON EAST Lothian
MEADOWMILL NURSERY	MEADOWMILL PRESTONPANS EAST Lothian
MACMERRY AIRFIELD	PENSTON TRANENT EAST Lothian
TYNEMOUNT BING	TYNEMOUNT ORMISTON EAST Lothian
PEASTON FARM COTTAGES & SMITHY	WEST PEASTON ORMISTON EAST Lothian
HARELAW LIMEKILN	MID ROAD LONGNIDDRY EAST Lothian
OLD SCHOOLHOUSE & OUTBUILDINGS	ABBEYMILL FARM HADDINGTON EAST Lothian
AMISFIELD STABLES	AMISFIELD PARK HADDINGTON EAST Lothian
INDUSTRIAL SITE	WHITTINGHAME DRIVE HADDINGTON EAST Lothian
GIN HEAD RADAR STATION	TANTALLON NORTH BERWICK EAST Lothian
SITE AT	EAST FORTUNE HOSPITAL EAST FORTUNE EAST Lothian
WEST SITE	EAST BARNS DUNBAR AREA EAST Lothian
EAST SITE	EAST BARNS DUNBAR AREA EAST Lothian
TEMPLEDEAN HALL NURSING HOME	TEMPLEDEAN PARK HADDINGTON EAST Lothian
SITE AT BERMALINE MILLS	WHITTINGHAME DRIVE HADDINGTON EAST Lothian

East Lothian Council Scottish Vacant & Derelict Land Survey 2023

- 6.53. The County has very little brownfield land with the exception of two larger sites at Cockenzie and the old East Fortune Hospital. The lack of brownfield land will impact on the ability of the new strategy to divert new allocations away from greenfield locations.

- 6.54. Mapping showing vacant and derelict land can be found in the Story Map part of the Evidence Report, in slide 2 of the Key Evidence for LDP2 Spatial Strategy section.

Coastal Change

- 6.55. Dynamic Coast has provided information on the potential coastal erosion through its coastal analysis report for Scotland, Our Dynamic Coast, which can be seen in the Evidence Report.
- 6.56. East Lothian Council is proposing to update their Shoreline Management Plan (SMP), developed in 2002, with a Coastal Change Adaptation Plan (CCAP) in the near future. This will assess the risk from the coast, including coastal erosion, and provide a strategy in adapting to this risk.

Electricity and Gas

- 6.57. The Scottish Government has committed to Scotland becoming a 'net zero' country by 2045. National priorities are set out within the publication "Securing a green recovery on a path to net zero: climate change plan 2018–2032". To meet the climate change targets, and due to the decreasing supply of fossil fuels, decarbonisation of the energy network is a key priority. Another key aspect of the plan is the sustainable security of electricity supply, which will be achieved in part through energy storage and smart grid technologies.
- 6.58. Part of the transition to net zero involves significant change to the energy network in Scotland to allow decarbonisation. This will mean long term change to make the shift away from gas as an energy source and more reliance on electricity, with this energy largely coming from renewable sources. In 2022, 87.9% of electricity generation came from zero or low carbon sources. There are however some challenges with this shift away from gas to electricity usage. The first is the cost of electricity compared to gas, which is around four times the price at present. Another key issue is providing the necessary infrastructure to allow for this shift, with existing systems not able to manage the increased demand that will come from such a shift away from gas. Increased demand from sources such as industry, transport and residential (including the expansion of the electric vehicle charging network), all present challenges for the future. Further information is available within the Renewable Energy chapter and the Climate Change chapter of the Evidence Report.

Gas Network

- 6.59. National Gas Transmission (formerly National Grid Gas) owns and operates the high-pressure gas transmission system across the UK. This consists of around 4,300 miles of pipelines and 26 compressor stations connecting to the distribution networks. In the UK, gas leaves the transmission system and enters the distribution networks (SGN in East Lothian) at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to sites and premises. National Gas Transmission owns the gas pipeline that runs from the St Fergus terminal near Peterhead to the north of England crossing north to south through East Lothian.
- 6.60. The location of these underground pipelines can be a constraint to development of land due to the need for minimum stand-off corridors with buildings for safety purposes.
- 6.61. The gas network in East Lothian is extensive, however due to the rural nature of some of the landscape, there are parts of the county that are not able to be served by the network. These properties tend to rely on bottled gas deliveries, with others utilising other fuel sources e.g. solid fuels.
- 6.62. Scottish Gas Networks, who control the distribution of gas within settlements, continue to invest in gas main renewal allowing for future changes in the type of gas households may use in the future. Scotland's first households to use hydrogen gas are expected to be connected in a pilot in Fife in 2024.

Most settlements in East Lothian are connected to the gas network but some rural areas rely on liquid petroleum gas deliveries.

- 6.63. From April 2024, changes to building regulations will mean new homes and buildings will not be allowed to use direct emission (or polluting) heating systems like oil and gas boilers, and bioenergy. Instead, they will need to use climate-friendly alternatives like heat pumps and heat networks (also referred to as clean heating systems). Heat networks can be used regardless of their fuel source, including ones using direct emissions heat. This will impact upon new developments as the standard applies to all new buildings (and some conversions) where a building warrant is applied for from 1 April 2024.
- 6.64. Existing buildings will need to be retrofitted which is a less straightforward process. However, there are no requirements set out within law yet. The Scottish Government have been carrying out consultation on their proposed Delivering net zero for Scotland's buildings - Heat in Buildings Bill.
- 6.65. As part of LDP preparation, further information will be sought from Scottish Gas Networks in relation to decarbonisation projects and any scope for change in East Lothian as part of the climate emergency and transition to net zero. Where possible, the next LDP will look to intervene, for example, through specific design policies or through detailed site briefs, to help achieve wider targets for net zero and reduced reliance on fossil fuels.

Electricity Network

- 6.66. East Lothian currently exports electricity to the national grid generated from nuclear at Torness, which is due to be phased out within the next ten years and renewable electricity generation from windfarms in East Lothian and in future from out at sea. New connections to the national grid are planned at Cockenzie and south of Dunbar to deliver the electricity generated by offshore wind farms to the grid. A relatively new development type coming forward is for battery storage facilities.
- 6.67. Scottish Power Energy Networks (SPEN) are the distribution and network transmission operator in Scotland. This is provided through a series of overhead lines and underground cables which they own and maintain. SPEN have made significant investment into innovative solutions for the changing energy network across Scotland to facilitate the transition to a low carbon economy. The map on page 14 of the Key Evidence for LDP2 Spatial Strategy part of the Storymap provides the locations of electricity distribution across the County.

Priorities and challenges

- 6.68. NPF4 policy 11 (Energy) requires Local Development Plans to seek to realise their area's full potential for electricity and heat from renewable, low carbon and zero emission sources by identifying a range of opportunities for energy development.
- 6.69. Key challenges for the next LDP will be to find ways to facilitate the transition towards net zero in line with national targets and priorities, as well as meeting the aims of East Lothian Council's Climate Change Strategy. At the county level, there are significant challenges ahead for infrastructure including an overall shift away from gas, particularly problematic for large scale industrial sites which East Lothian has, as well as the retrofitting of thousands of existing buildings. Finding innovative ways to make best use of heat networks and decarbonised methods for cooling buildings will also contribute towards achieving net zero. There will need to be a balance between providing essential infrastructure in the form of interconnectors, battery energy storage etc. which allows renewable energy to be harnessed, stored and distributed, whilst ensuring the protection of the character of the area. At a more local level, infrastructure needs to be in place to cope with forthcoming increases in demand for electricity, such as households, electric vehicle charging network etc. Where possible, interventions through policy approach will help to deliver on these key challenges, but it also relies upon future funding given the high cost of transitioning to net zero. To deliver on these national targets, only a joint approach will achieve such

ambitious aims. As well as the next LDP contributing to these, there will also need to be an overall shift in approach from key stakeholders such as developers, landowners, network operators etc.

Broadband and Mobile

- 6.70. Broadband and mobile connectivity are essential infrastructure providing people with the ability to communicate effectively and helps businesses to function and be competitive. As Scotland's economy grows and diversifies, there is an increased need for effective digital communications infrastructure.
- 6.71. Digital communications infrastructure in Scotland is generally owned by Openreach Ltd, a subsidiary of BT Group. The numerous broadband providers utilise the copper wires and cables which Openreach manage to provide broadband and telephone services to homes and businesses.
- 6.72. In general, broadband coverage within East Lothian is very good. However, there are some areas that experience a lack of service or poor quality broadband connection resulting in slow speeds. These tend to be the more rural areas where providing the necessary infrastructure is more complex. Mapping showing current broadband speed and links to other related statistics can be found on page 13 of the Key Evidence for LDP2 Spatial Strategy of the Storymap.
- 6.73. Currently, East Lothian has more than 95% coverage for superfast broadband (see Economic Development Strategy). This provides speeds of between 30-300Mbps. However, coverage for ultrafast broadband is lagging behind and requires work to achieve the necessary speeds of over 300Mbps.
- 6.74. Ensuring all parts of Scotland have access to full fibre broadband is a key target for the Scottish Government. They are also committed to reducing the costs of broadband, making it more accessible to a larger proportion of the population. It is necessary to install new infrastructure rather than being able to rely on existing. To achieve these targets, the Scottish Government have a number of initiatives.
- 6.75. The Council will liaise with Scottish Government and relevant organisations to ensure that further broadband improvement in East Lothian is facilitated to reduce barriers to digital inclusivity.

Scotland's Full Fibre Charter

- 6.76. The Scottish Government launched its Full Fibre Charter in 2020 with a series of pledges to
1. Relieve rates – remove non-domestic rates on newly laid and “lit” infrastructure allowing reinvestment into fibre building. Originally this was to be for a 10-year period but has now been extended up to 2034.
 2. Identify priorities – work with signatories to identify areas in greatest need for mobile and broadband connectivity, and how to accelerate investment into digital infrastructure.
 3. Identify opportunities – work with public sector partners to encourage anchor tenancy and other use of fibre infrastructure. Promote the Scottish Wide Area Network (SWAN).
 4. Overcome barriers – work with signatories to develop solutions and implement means to investigate barriers to the efficient deployment of fibre infrastructure, working closely with the UK Government.
 5. Come together/collaborate - promote a regular open and inclusive forum for industry, facilitated by Ministers with input as appropriate from key bodies such as regulators, trade unions etc.

Reaching 100% (R100)

- 6.77. The Scottish Government introduced the R100 project which is a commitment to provide access to superfast broadband to every home and business. This is done through the Scottish Broadband Voucher Scheme (SBVS) and will provide funding to help homes and businesses not in scope of either Reaching

100% (R100) contracts or planned commercial investment to obtain superfast broadband where providers may not ordinarily go. East Lothian has been working with the Scottish Government on this programme and we have identified 899 homes and businesses within the county that would qualify for the SBVS. Work on achieving the targets of the programme is ongoing.

Scottish 4G infill programme

6.78. The Scottish Government's Scottish 4G Infill Programme (S4GI) is a £28.75 million initiative delivering 4G infrastructure and services in 55 mobile "not spots" in rural and island parts of Scotland. WHP Telecoms are the Scottish Government's infrastructure provider and has begun site acquisition to achieve three fundamental consents:

- agreed terms with a landowner
- achievement of planning permission from the local planning authority
- commitment from at least one mobile network operator (EE, VMO2, Three, Vodafone) to providing 4G mobile services from that site.

6.79. Within East Lothian, a new mast has been provided within the Garvald area allowing 4G coverage through Vodafone and Virgin Media O2. There are currently no other sites within East Lothian that have been selected for inclusion within the programme.

Shared Rural Network

6.80. The Shared Rural Network (SRN) will deliver reliable mobile broadband to 95% of the UK, addressing the digital divide by improving 4G coverage in the areas that need it most. The UK's four mobile network operators (EE, Three, VMO2 and Vodafone) are investing in upgrading their existing networks and working together on shared infrastructure and new sites. This will allow each operator to reach 90% geographic coverage, which will result in 84% of the UK having 4G coverage from all four operators, increasing choice and boosting productivity in rural areas. In addition, the UK Government will provide funding for new masts in order to eliminate "partial not spots" where there is coverage from one but not all operators.

Project Gigabit

6.81. This is the UK government's programme for enabling hard to reach communities to get fast broadband connections. It targets homes and businesses that are not included in broadband suppliers' plans, reaching parts of the UK that might otherwise miss out on getting the digital connectivity they need. This is done through the Gigabit Broadband Voucher Scheme where eligible homes and businesses can obtain funding for installing gigabit broadband. This is achieved through broadband service providers who have registered to provide connections through the scheme.

Cultural Venues

6.82. The Planning (Scotland) Act 2019 introduced a new requirement for LDPs to include a list of all cultural venues. NPF4 policy 31 (Culture and creativity) provides more clarity on how these venues are to be managed through development planning and the development management process.

6.83. The following table contains a list of all cultural venues for theatre, the arts, and music in East Lothian. These are divided into venues that are main arts venues (permanent installations), regular arts venues (regularly used but with changing installations and events) and occasional arts venues (typically used during annual events or for occasional live music).

MAIN ARTS VENUES	REGULAR ARTS VENUES	OCCASIONAL ARTS VENUES
The Brunton, Musselburgh: Permanent Theatre, Cinema, Events (Currently closed)	The Corn Exchange, Haddington: Live music venue, exhibitions, events	Lodge Grounds North Berwick: Annual Fringe-by-the-Sea venue during the Edinburgh festival for theatre and live music performances
National Museum of Flight, East Fortune: Permanent museum plus occasional events venue e.g. for Aero Auto displays	Old Town Hall, Prestonpans: Battle of Prestonpans Museum and visitor attraction	Rugby Club, Musselburgh: Occasional live music
Prestongrange Industrial Heritage Museum, Prestonpans: Permanent Museum	North Esk Church, Bridge Street, Musselburgh: Lammermuir Festival venue Exhibitions	Racecourse, Musselburgh Occasional live music
Papple, Whittingehame: Agricultural Heritage Museum (under construction)	Tynninghame Hall, Tynninghame: Cinema, Events	Ravelston House Hotel, Musselburgh, Occasional live music
The Coastal Communities Museum, North Berwick: Permanent Museum	East Linton Hall, East Linton: Exhibitions, Cinema, Events; Live Music	The Gothenburg, Prestonpans Live music, exhibitions and events (Recently changed to restaurant)
John Gray Centre, Haddington: Permanent Museum	Poldrate Mill, Haddington: Exhibitions	Community Centre, Preston Road Prestonpans Occasional live music, theatre, events
Myreton Motor Museum, Aberlady: Permanent Museum		Prestoungrange Parish Church, Kirk Street Prestonpans: Lammermuir Festival venue
Town House, Dunbar: Permanent Museum		Drummohr House, Musselburgh: (Midsummer Festival 2019; Dragons virtual reality event 2017, Winter lights show)
John Muir Birthplace, High Street Dunbar: Permanent Museum		Gosford House: Winter wonderland 2021; Gosford Games, other events
Preston Mill, East Linton: Permanent Museum		Lennoxlove House, Haddington: Lammermuir festival venue

		Alastair Grant Hall/Bridge Centre Poldrate Haddington: Live music, Events	
		Cockenzie House, Cockenzie: Events, Exhibitions	
		Stenton Parish Church Lammermoor Festival venue	
		Innerwick Parish Church (Lammermuir Festival)	
		St Mary's Parish Church Haddington: Lammermuir Festival venue	
		Holy Trinity Church Haddington: Lammermuir Festival venue	
		Dunbar Parish Church: Lammermuir Festival venue	
		Blackadder Church, North Berwick: Exhibitions, events	
		The Hope Rooms, North Berwick: Exhibitions	
		Garvald Village Hall, Garvald: Lammermuir Festival venue	
		Gladsmuir Church, Gladsmuir: Lammermuir Festival venue	
		Dirleton Kirk, Dirleton: Lammermuir Festival venue	
		Aberlady Parish Church, Aberlady: Lammermuir Festival venue	
Disused Railway Lines			

- 6.84. The Planning (Scotland) Act 2019 introduced a new requirement for LDPs to include a map of disused railway lines, with the possibility of, at some point, there being scope to reopen them as functioning rail lines.
- 6.85. East Lothian has a number of disused railway lines, some of which are now in use as part of the walking, cycling and wheeling network. In these locations, the railway lines themselves have largely been removed, together with any other infrastructure. There are some parts of the old railway infrastructure that still remain in places e.g. in Pencaitland where there are still crossing gates and signal towers along the route, albeit limited.
- 6.86. Whilst preparing a map of disused railway lines is a new requirement, at this point it appears that none of the old routes represent a feasible option for reinstatement and reopening as an active railway line. However, any opportunities for realistic proposals will be explored in preparing the next LDP.
- 6.87. Potentially more feasible is the use of old railway routes for sustainable transport where they are not already in use. This has potential, depending on their location, to help connect settlements and help targets towards reducing car usage and improving walking, cycling and wheeling. Links with health and 20-minute neighbourhoods will need to be explored should any opportunities be identified through the route mapping exercise.

Public Toilets and Water Dispensers

- 6.88. The Planning (Scotland) Act 2019 introduced a new requirement for LDPs to provide details of public toilet facilities and water dispensers within each county. The Council's Transformation Team hold information relating to these facilities.

Public toilets within settlements

- 6.89. There are a total of 9 operational public toilet facilities across our urban areas. These are as follows:

Dunbar	Haddington	North Berwick	Port Seton	Prestonpans	Gullane	Musselburgh	Tranent
Bayswell Road	Neilson Park	Quality Street	Links Road	Ayres Wynd	Goose Green	Shorthope Street	Lindores Drive
						Fisherrow Harbour	

Public toilets at coastal parking locations

- 6.90. East Lothian has 13 sites designated as coastal car parks, with a number of these containing public toilet facilities at or close to the car parks. Some of these are recently built and include showers as well as toilet facilities.

Coastal parking location	Facilities
Longniddry Bents no.1	Toilets
Longniddry Bents no.2	Toilets and shower (outdoor)
Longniddry Bents no.3	Toilets
Aberlady	Toilets
Gullane Bents	Toilets
Yellowcraig	Toilets and shower (outdoor)
John Muir Country Park	Toilets and shower (outdoor)
Shore Road, Belhaven	Toilets

Whitesands	Toilets
Skateraw	Toilets

Water Dispensers

- 6.91. East Lothian's first "Top Up Tap" by Scottish Water was installed at Quality Street, North Berwick encouraging the use of reusable water bottle.

Memorial Water fountains

- 6.92. Drinking water fountains can be found at historic locations such as:
- Innerwick Jubilee Fountain and Trough, Innerwick
 - Brown Memorial Fountain, Court Street, Haddington
 - Tranent Fountain, Tranent
 - Drysdale Fountain, East Linton
 - Queen Victoria Jubilee Fountain, Queens Road, Dunbar

Other Spatial Considerations

- 6.93. There are several other spatial considerations that will be factored into the development of the spatial strategy both at a county and site specific level. These are as follows:
- Waste – East Lothian has several operational waste facilities that will remain in operation during the lifetime of the LDP. Links to the national waste hierarchy and local waste statistics can be found in the page 22 of the Key Evidence for LDP2 Spatial Strategy section of the Storymap.
 - Coal mining legacy – many areas in the west of the County are affected by the presence of old mine workings. Ground stability will require to be considered as part of the site selection process. Mapping showing areas of risk of undermining is shown on page 22 of the Key Evidence for LDP2 Spatial Strategy section of the Storymap.
 - Water Quality – New development will be required to ensure that it does not negatively impact on the areas water quality. Currently quality varies considerably across the County. Baseline information is provided through a link to a SEPA website on page 22 of the Key Evidence for LDP2 Spatial Strategy section of the Storymap.
 - Air Quality – Generally the air quality of East Lothian is reasonable with some issues being identified along the main transport routes and closer to Edinburgh. Mapping and links to this information is provided on page 7 of the Key Evidence for LDP2 Spatial Strategy section of the Storymap.

Site Assessment Methodology

- 6.94. The Council has produced a site assessment methodology that will be used to assess proposals being promoted for the spatial strategy. This is provided as document ELC 059. This is based on a template produced by the key agencies. Views were sought from the housing industry on this methodology.

SUMMARY OF STAKEHOLDER CONSULTATION

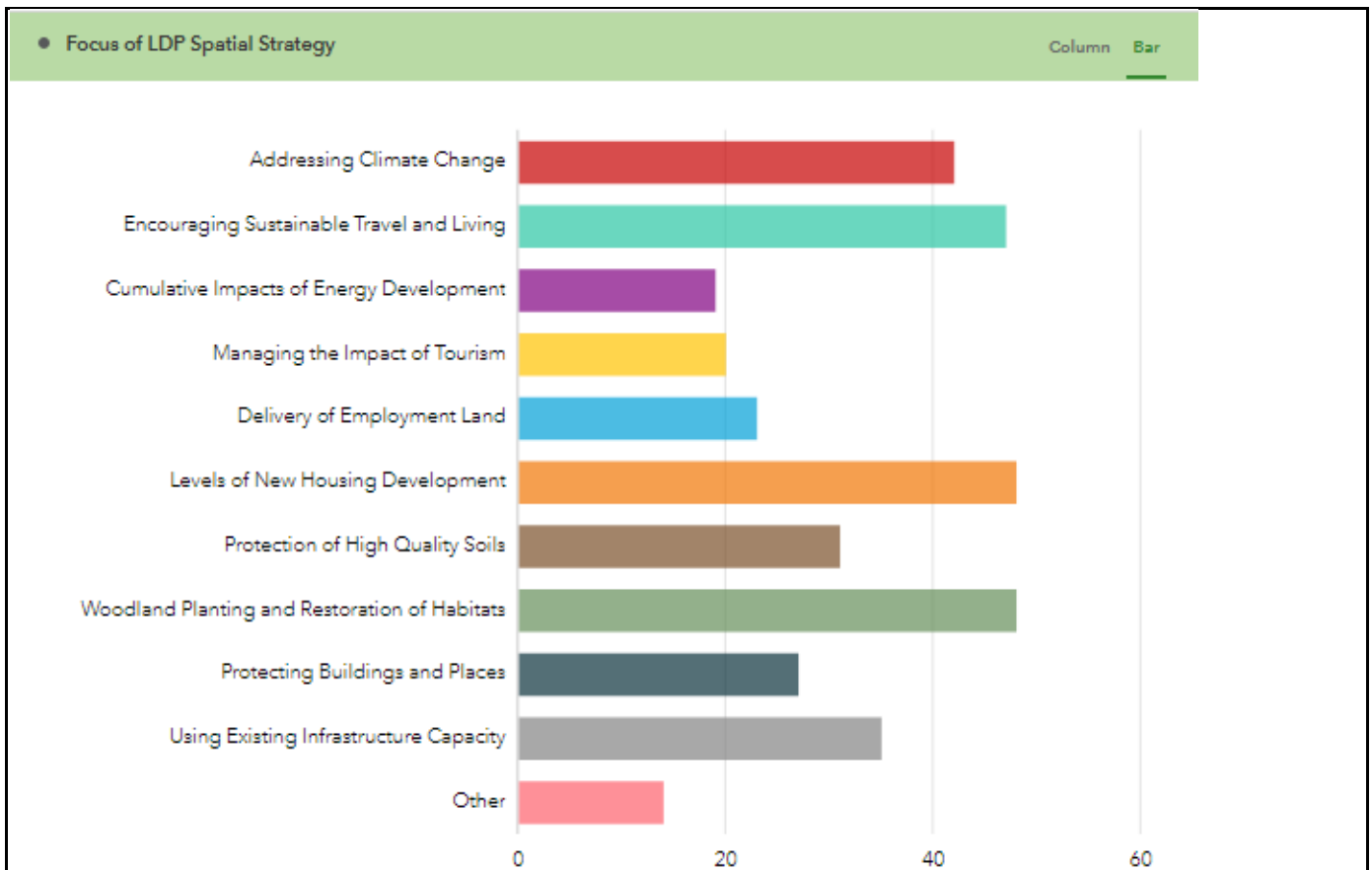
6.95. The Council carried out extensive consultation with the local community and other stakeholders. Engagement activities ran for 14 weeks, between June and September 2023. Specific meetings were held with NHS Lothian and East Lothian Economic Development colleagues. As well as public wide consultation and general consultation information was also gathered from surveys with young people (of various ages), individuals with particular needs including accessible housing needs, gypsy travellers and general consultation with key agencies, the development industry and the public. Comments received on Housing are covered in Topic Paper 12 and comments received on transport are covered in Topic Paper 13.

6.96. A Summary of Evidence Report Engagement Topic Paper (ELC 060) has been produced which outlines the engagement process of the Evidence Report. Discussions of the main issues that will form part of the next LDP were held with a group of Key Agencies. Those involved were as follows:

- Historic Environment Scotland
- Nature Scot
- NHS
- NHS Lothian
- Scottish Enterprise
- Scottish Environment Protection Agency
- Scottish Water
- Sport Scotland
- Scottish Forestry (through development of Tree and Woodland Strategy).

6.97. Details of the key agency engagement, the comments received and the Councils response can also be found in this document (ELC 060).

6.98. Within the online questionnaire, respondents were asked to vote on which issue/s they believed were important for the spatial strategy of the next Local Development Plan. The results were as follows:



6.99. Responses from the general public consultation can be summarised as follows:

- Infrastructure first approach
- Protection of countryside instead of house building
- Level of commuting to Edinburgh along the A1
- Need for more employment land
- Public transport/mass transit improvements
- Protection of habitats
- Retention of trees and woodland
- Addressing health inequalities
- Existing infrastructure is at capacity
- Increase housing density and affordable housing provision
- Nature based solutions to managing climate change
- Sustrans proposed cycle path (Musselburgh) means more concrete and is not necessary
- Address climate change impacts as a priority over other topic areas
- Lack of green space in new housing developments

- Need for new woodland for recreation
- Disturbance to species and habitats through construction
- Protect agricultural land and green space from house building
- Large scale housing is impacting upon infrastructure and quality of our towns
- Encourage local living
- Exploitation of coastal areas through current policies
- Nature needs time to recover
- Population in other areas e.g. West Lothian is declining, so why is there so much house building in East Lothian?
- Effects of climate change on food production with farmers protecting their land
- Turn coastal areas into wetlands e.g. increase size of, and create new, lagoons
- Planting specific grasses to reduce sand depletion
- Review green belt policy
- Concern over projected population increase and ageing demographic
- Focus on 20-minute neighbourhoods with Longniddry South being a good example as it is near to existing public transport. It can also be expanded in future with built heritage restoration and biodiversity enhancement plans
- Need for sustainable energy and building strategy
- Need to reassess all existing sites (within the LDP 2018)
- Focus on community wealth building and wellbeing economy
- Focus on place principle and place-making
- Ageing population requires better mix of housing
- Protection of rural villages and way of life
- Redesign the Musselburgh Flood Protection Scheme to mitigate a lower level of risk to reduce the proposed walls

Children and Young People

6.100. Engagement exercises were carried out by East Lothian Play Association. A report was provided to the Planning Service in November 2023 detailing the findings. A total of 424 pupils aged 4-12 participated from primary schools and community settings.

6.101. The following table shows the participants from the summer engagement exercises:

Location	Area	Number of participants
Lewisvale Park, Musselburgh	Musselburgh	22
Fisherrow Links Playpark, Musselburgh	Musselburgh	24

Wallyford Playpark	Musselburgh	7
Winton Place/Lindores Drive green space, Tranent	Fa'side	12
Memorial Park, Haddington	Haddington and Lammermuir	10
Cockenzie House, Cockenzie	Preston, Seton, Gosford	10
Total: 85		

6.102. The table below shows the number of pupils from the Primary Schools involved in term-time engagement activities:

Stoneyhill Primary School, Musselburgh	Musselburgh	45
Dirleton Primary School	North Berwick, Coastal	42
West Barns Primary School	Dunbar	22
St Martin's Primary School, Tranent	Fa'side	29
St Mary's Primary School, Haddington	Haddington and Lammermuir	25
Longniddry Primary School	Preston, Seton, Gosford	33
Aberlady Primary School	North Berwick, Coastal	32
Whitecraig primary School	Musselburgh	39
Cockenzie Primary School	Preston, Seton, Gosford	39
Sanderson's Wynd Primary School, Tranent	Fa'side	33

Total: 339

6.103. Poor public transport accessibility within rural areas was highlighted as an issue. There was also recognition of the disconnect between an infrastructure first approach and the lack of funding for transport provided by housing developers.

6.104. Comments were received from Homes for Scotland on the Site Assessment Methodology. They raised several detailed points around the flooding assessment, viability information required, education capacity calculations and calculation of 20 minute neighbourhoods. These are all points that will be considered when undertaking the assessment of sites at the next stage of the LDP.

WHAT THIS MEANS FOR THE PROPOSED PLAN?

- 6.105. Future growth in East Lothian can only be delivered if there is sufficient infrastructure to support it, either now or with planned investment. Before future growth can be assumed it also requires careful consideration of the characteristics of East Lothian as well as a balanced approach to infrastructure provision.
- 6.106. Above all considerations in the spatial strategy will be the financial pressures the Council is facing and the ability for it to provide and maintain additional infrastructure will be severely limited in the absence of additional financial support.
- 6.107. Also, there are a number of constraints to growth and development which must be considered when making decisions on the next Local Development Plan. Constraints can be related to physical or environmental factors such as location, ground conditions, former land uses, etc. but are also related to the available infrastructure capacity to serve new development. They can also relate to protective designations or policies at either national or more local level. A careful balance will be necessary in order to be able to support any growth whilst at the same time achieving the targets for net zero.
- 6.108. The delivery of the HLR set out in this Evidence Report will be challenging to accommodate due to the restrictions set out in the Topic Papers. Even with the use of spare infrastructure capacity it is expected that additional provision will be required although the exact location is unknown until the spatial strategy is developed. There will also be impacts of agricultural land, but every effort will be made to keep this to a minimum. While the location of impacts is not known the following sets out how these impacts will be identified and addressed at the next stage of the LDP.

Agricultural Land and Soils

- 6.109. Due to the presence of large areas of class 1, 2 and 3.1 prime agricultural land, this limits the type of development that could occur in these areas. NPF4 policy 5 only allows a few exceptions to development on prime agricultural land, these being essential infrastructure (with no other suitable location), small-scale development directly linked to a rural business, production and processing facilities associated with the land produce where no other local site is suitable, or for the generation of renewable energy or mineral extraction and where there is secure provision for restoration.
- 6.110. Current policy in the LDP 2018 includes green belt designation/protection as well as DC1 and DC8 countryside policies. There may be a need to develop a new/updated policy to ensure sufficient protection of prime agricultural land in the next LDP, with more specific development types that can be exceptions.
- 6.111. In terms of developing an overall spatial strategy, there is a direct link between the restrictions on development type allowed on agricultural land, and the ability to designate any sites in the next LDP for residential/mixed-use or employment use. The intention of NPF4 policy is for LDPs to safeguard prime agricultural land and minimise disturbance from development. However, in meeting the Housing Land Requirement (HLR), it is likely that some land will need to be allocated for housing—even where it includes prime agricultural land—due to the limited availability of brownfield sites and the fact that much of the land in East Lothian in appropriate locations is not of prime quality.

Education

- 6.112. The education estate in East Lothian is currently under review by Education Services. There are also ongoing changes in relation to the building of new facilities consented on sites allocated within the LDP 2018. There are also other priorities for the renovation of existing facilities. It will be necessary to work closely with Education Service to develop the overall spatial strategy to ensure education needs can be met. There is a link between the programme for the education estate (new facilities and upgrades) with the potential allocation of sites in the next LDP for housing. It will also be important to consider how to manage schools in rural locations where pupil numbers are low.

- 6.113. There will be continued expansion of the Education estate to meet the requirements of LDP1. This will put severe strain on the Council's finances due to the increase in build costs and the inability of the Section 75 regime to factor in inflationary changes that are above BCIS indexation levels, as has been experienced recently.
- 6.114. There is also a shift in the approach to providing educational facilities i.e. more of a focus on campus type facilities. Several schools will come to the end of their PPP contracts during the lifetime of the LDP and any changes to the estate as a result will need to be factored into the spatial strategy. Due to this, there may be a need to consider more carefully how to make the best use of such sites and spaces. One aspect of this is the co-location of services i.e. education, health care etc. This is likely to be a more efficient use of land and other resources, but the suitability of this approach will depend on the particular location and circumstances e.g. budgets, projects being developed by other Council Services and external bodies etc.
- 6.115. Additionally, there is a link between educational capacity and the 20-minute neighbourhood principle. School children should ideally be able to be educated as close to home as possible. They should also be able to easily access their educational establishment, ideally by walking, cycling and wheeling.
- 6.116. These two approaches could bring conflicting aims and the ability to provide services in the ideal manner will have to be factored against the financial challenges that the Council is facing.
- 6.117. The infrastructure first approach will encourage future strategy to make use of existing capacity first. Financial challenges will also make this a priority as the ability of the Council to maintain additional education facilities will be severely limited if not unmanageable.

Flood Risk

- 6.118. NPF4 has placed more importance on avoiding development in areas at risk from flooding, but also on community resilience. Policy 22 (Flood Risk and Water Management) sets out the limited types of development that can occur on areas at risk from flooding. It also states that there is a need for LDPs to take into account probability of flooding from all sources (coastal, river and surface) and use the most up to date information on flood risk and climate change. Policy 22 also requires LDPs to ensure greater resilience to the effects of climate change. SEPA have prepared maps showing longer term climate change predictions which must be taken into account, particularly when considering the whole life-cycle of developments.
- 6.119. A Strategic Flood Risk Assessment has been prepared which will be a factor in developing the spatial strategy for the Proposed Plan. It identifies all known areas of flood risk but also highlights some gaps in knowledge that will be addressed in the preparation of the Proposed Plan.
- 6.120. Linked to policy 22 on flood risk are other NPF4 policies and general principles including policy 2 (Climate Mitigation and Adaptation), policy 10 (Coastal Development), and policy 20 (Blue and Green Infrastructure). Opportunities for addressing multiple issues or achieve multiple benefits across different (but connected) issues will need to be explored as the next LDP is developed.
- 6.121. Within the existing LDP 2018, there are specific flood risk and related policies (NH9: Water Environment, NH10: Sustainable Urban Drainage Systems, and NH11: Flood Risk), together with references within related and relevant policies (e.g., Design policies DP3 & DP4). A specific SuDS SPG was also approved as part of the current LDP 2018. Any policies within the next LDP will need to include the most up to date guidance from SEPA as well as research and best practice on issues such as SuDS as well as the Strategic Flood Risk Assessment. There will be a need to revisit flood risk and determine whether there has been any significant change affecting existing sites.
- 6.122. The next LDP must ensure development does not occur on areas at risk from flooding. Work with SEPA will be required to ensure areas are correctly designated based upon any new or updated flood mapping and climate change predictions. New policies and/or guidance on flood risk within the next LDP

must meet the up to date flood risk requirements set out by SEPA. This will assist decision making for both land allocation and development management decisions. Any policies must reflect updated climate change allowances from SEPA.

6.123. SEPA have prepared Flood Risk Management Plans, with local authorities also publishing Local Flood Risk Management Plans (LFRMPs), most recently covering 2022-28; East Lothian falls within the Forth Estuary LFRMP.

6.124. In addition to managing flood risk, the water management aspect will also need to be considered within the next LDP. This relates to issues such as water quality and seeking improvements within the wider water environment. Scope for strategic projects and collaboration on proposals that may overlap into other Local Authority areas will also be explored through joint working with neighbouring Councils.

Water Supply and Wastewater

6.125. There are no policies specifically related to water supply in the LDP 2018. However, evidence shows that fresh water supply is not a significant issue in East Lothian. This will continue to be monitored as progress with the next LDP is made.

6.126. For wastewater, whilst there are no existing policies specifically on wastewater, there are references to this subject in particular within Design policies (DP1 – DP7). These are intended to assist with decision-making particularly at development management level.

6.127. There will be a need to ensure continued alignment of development (particularly larger scale projects) with Scottish Water upgrades and asset planning to minimise delays related to wastewater capacity. This includes the North Berwick area where a new treatment works is required to accommodate future growth. There may be constraints on areas where, if any sites are proposed for allocation in the next LDP, upgrades are required within the wastewater network. Collaboration with Scottish Water will allow this to be managed effectively.

6.128. Wastewater capacity can also be impacted by climate change where, particularly during storms, the network can become overwhelmed. This is exacerbated by a general increase in the use of hard and/or non-porous surfaces. Opportunities will be explored within the next LDP for maximising green and blue infrastructure which will generate multiple benefits including on the wastewater network, biodiversity, and climate change mitigation and adaptation. This needs a multi-disciplinary approach between East Lothian Council and Key Agencies such as Scottish Water, SEPA, Nature Scot etc. Collaboration with the Key Agency group will be ongoing as the next LDP progresses to ensure alignment of Council related plans and strategies with Key Agency advice.

Health and Health Facilities

6.129. Health is a significant part of the NPF4 and, together with the nature crisis and climate emergency, is one of the three main issues that LDPs will need to address.

6.130. Within the infrastructure section, the focus is on the physical health assets on the ground (GP surgeries and hospitals). The health of the population is dealt with separately in the Health Topic Paper ELC 004. However, Health and wellbeing must be treated as a central planning priority. The spatial strategy should reflect a 'Health in All Policies' approach, ensuring that land use decisions support physical, mental, and social wellbeing.

6.131. Although based on the mapping of locations and catchments it would appear there is a good spread of healthcare facilities, this can hide issues with actual capacity. NHS Lothian is responsible for ensuring the population has access to primary health care and that people can register with a GP. This needs to be the case for all population demographics.

- 6.132. Existing LDP policy HSC1 provided protection for operational health care sites as well a supporting new or expanded facilities where planning permission had already been granted. PROP HSC2 set out the proposals from NHS Lothian as part of their modernisation agenda.
- 6.133. NPF4 contains policy 23 (Health and Safety) which states that LDPs should tackle health inequalities and identify health and social care infrastructure needs in the area. The spatial strategy must prioritise investment in areas with lower life expectancy and higher disease burden. This includes equitable access to healthcare, green space, and active travel infrastructure. Deprivation linked health disparities are highlighted in the Health Topic Paper ELC 004.
- 6.134. As health care is a key aspect of the infrastructure needs of the population, there is an important link with the development of an overall spatial strategy for the next LDP.
- 6.135. Some health facilities that had planned expansion to accommodate growth from LDP 2018 will now be at capacity. This could limit further housing land allocations without intervention. Should there be any proposed allocations for new housing developments, it will be necessary to continue to work closely with NHS Lothian regarding capacity of GP surgeries and hospitals. Through collaborative work with NHS Lothian we have gathered established information on the capacity of the General Practices in the nine health centres in East Lothian to accommodate further population growth. This information can be found in detail in Appendix 1. Some GPs have capacity to accommodate a further 1500 patients however beyond this intake would require other health services in the building being relocated. Some buildings have capacity to accommodate up to 3000 new patients, but none have the capacity to accommodate more than 3000, although a couple could if other services were relocated. 1500 is used as figure as this growth would trigger a need for an additional GP and therefore a new consulting room.
- 6.136. East Lothian HSCP has limited options to relocate services in health centres as there is limited alternative accommodation. So, in most communities either community services would need to be scaled back or alternative accommodation found. In some cases this will require office accommodation (e.g. as a base of District Nurses) but most will require some form of clinical space (e.g. physiotherapy). Also, the services already in Health Centres are usually ones that need to be locally accessible to communities.
- 6.137. The demographic changes over the next decade will see a large increase in the number of frail people living in community and this is likely to increase demand for health centre accommodation. How it will impact though is unclear as it depends on the service models and need for clinical space.
- 6.138. Any growth must not have a corresponding negative impact on new or existing communities i.e. people being unable to register with a GP due to capacity limitations, being located in an area where travel time is unreasonable, or where there are no options for public transport or sustainable travel modes. The next LDP will be formed through continued liaison with NHS Lothian to inform decisions on land allocations, specific policy requirements and developer contributions (where applicable). Design principles should incorporate suicide prevention measures, including lighting, visibility, and barrier design, especially in areas identified as higher risk. This aligns with NPF4 Policy 23(f).
- 6.139. These issues will be assessed as the next LDP is developed in collaboration with NHS Lothian and key stakeholders. Health infrastructure capacity must be considered in site selection and phasing. NHS Lothian data shows that some GP practices are nearing capacity, and co-location of services may be necessary to support growth. The spatial strategy should promote 20-minute neighbourhoods to support local living, reduce car dependency, and improve health outcomes through walkable access to services. The Health Topic Paper (ELC 004) outlines GP capacity, demographic pressures and infrastructure gaps.

Vacant and Derelict Land

- 6.140. Sites that are designated as vacant or derelict may have potential to provide sustainable development locations as they are typically within or close to urban centres. It is broadly accepted that the reuse of an existing (brownfield) site or existing building can contribute towards sustainable

development objectives. This is through factors such as access to existing transport infrastructure, access to existing walking and cycling opportunities, reducing resources/waste, reducing development pressure on greenfield land, and the embodied energy of existing buildings. It is therefore important that priority is given to such sites in sustainable development locations given their multi-faceted nature.

- 6.141. NPF4 policy 9 (Brownfield, Vacant and Derelict Land and Empty Buildings) is the key policy related to this aspect of infrastructure. It requires LDPs to set out opportunities for reuse of brownfield land and vacant buildings. There are also more broad links between the reuse of such sites with policy 1 (tackling the climate and nature crisis), policy 12 (Zero Waste), policy 14 (Design, Quality and Place), policy 15 (Local Living and 20-minute Neighbourhoods), policy 25 (Community Wealth Building), and policy 27 (City, Town, Local and Commercial Centres).
- 6.142. The LDP 2018 contains non-specific but relevant policies such as TC1 (Town Centres First Principle) which encourages use of land within urban centres to be prioritised for use rather than greenfield sites and those that are far less accessible.
- 6.143. The next LDP will be climate change focussed and therefore key priorities will be ensuring development contributes towards achieving net zero, waste reduction, and protection of greenfield land. For vacant and derelict land and buildings in sustainable development locations, opportunities for removing barriers to their development and unlocking development potential will be explored.

Gas and Electricity

- 6.144. The key issues with gas and electricity are ensuring adequate supply to the population of East Lothian, as well as the resultant effects and/or innovation required to decarbonise the networks, thereby reducing our reliance on non-sustainable sources. Improving resilience to change i.e. power outages during storms, changing ways in which energy is produced and distributed, and continued reduction in availability of fossil fuels, all needs to be tackled as part of the climate crisis. These are nationally important issues however it is recognised that there is a need for all areas of Scotland to contribute towards these ambitious goals.
- 6.145. During the production of the Evidence Report information on gas and electricity supply was gathered from industry bodies and this information is highlighted in this Topic Paper and in the Storymap. With the level of development proposed in the County we will meet with energy providers as part of the development of the spatial strategy to ensure they have sufficient awareness of future development to plan network enhancements if required. This is the same approach taken when considering water infrastructure.
- 6.146. Developments are already underway with regards to offshore wind farms, work at Cockenzie to ensure this energy can be connected to the national grid, and other such as the High Voltage Distribution Link (Torness to Durham). This raises the possibility of further development pressure for sites to accommodate wind energy or other renewable technology, with potential pressure on highly sensitive landscapes in East Lothian. The key issue will be to balance the need to generate renewable energy with the protection of valued landscapes.
- 6.147. The intent of policy 11 (Energy) of NPF4 is to “encourage, promote and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation, storage, new and replacement transmission and distribution infrastructure and emerging low-carbon and zero emissions technologies including hydrogen and carbon capture utilisation and storage (CCUS).”
- 6.148. The policy states that LDPs “should seek to realise their area’s full potential for electricity and heat from renewable, low carbon and zero emission sources by identifying a range of opportunities for energy development.”
- 6.149. The existing LDP 2018 contains specific wind energy development policies (WD1-WD6) as well as policies EGT1-EGT4 regarding Energy Generation and Transmission at specific locations such as Torness

Nuclear Power Station and the former Cockenzie Power Station site. These policies require updating and/or removal due to changing circumstances, and this will be explored as part of the next LDP preparation.

- 6.150. Whilst the landscape of East Lothian is highly sensitive, and the next LDP will need to explore whether constraints should be placed on certain types of energy development in certain parts of East Lothian. Details of the proposed landscape study are provided in the Countryside Topic Paper. Another aspect is nuclear energy with Torness power station estimated to have 11 operational years left before decommissioning would begin. This site provides a significant contribution towards energy generation.
- 6.151. It will also be important to look at ways in which policy can facilitate the retrofitting of existing buildings to accommodate renewable technologies such as solar, wind, water and heat, with the aim to be able to transition away from a reliance on energy from the national grid.
- 6.152. These issues will need to be explored in depth during LDP preparation, with potential for both general (broad) policies and more specific policies.

Broadband

- 6.153. Broadband provision is important for ensuring connectivity for homes and businesses in both urban and rural locations. East Lothian has very good coverage in terms of superfast broadband at over 95% (as per Economic Strategy up to 2022). However, technology has moved on to the point that ultrafast broadband is now in much greater demand. This is in particular from businesses who require greater speeds and bandwidth in order to operate successfully.
- 6.154. NPF4 policy 24 (Digital Infrastructure) recognises the importance of digital communications for Scotland's places and economy. It also states that "LDPs should support the delivery of digital infrastructure, including fixed line and mobile connectivity, particularly in areas with gaps in connectivity and barriers to digital access."
- 6.155. The LDP 2018 contains policies DCN1 (Digital Communications Networks) and DCN2 (Provision for Broadband Connectivity in New Developments). These policies are currently very under-utilised therefore it will be necessary to address the reasons for this and potentially amend the wording.
- 6.156. The Scottish Government's Reaching 100% (R100) project is ongoing and work is underway within East Lothian to determine the locations where broadband provision needs to be improved. Other projects such as the Shared Rural Network the Scottish 4G infill programme may also allow East Lothian to address issues within the area where broadband provision and/or mobile coverage (including 4G) is limited or not available. Work will continue with the Scottish Government and infrastructure providers to determine scope for improving digital communications in East Lothian as part of the next LDP. For the overall spatial strategy, it will be important to evaluate the link between the availability of digital communications and decisions on issues such as housing or employment land allocations.

Cultural Venues

- 6.157. The new legislative requirement to prepare a list of cultural venues for the county will be complete for the next LDP. To date, a draft list has been prepared indicating the venue's typical function and frequency of events.
- 6.158. NPF4 policy 31 (Culture and Creativity) has been developed by the Scottish Government to "encourage, promote and facilitate development which reflects our diverse culture and creativity, and to support our culture and creative industries."
- 6.159. It is also stated that "LDPs should recognise and support opportunities for jobs and investment in the creative sector, culture, heritage and the arts."
- 6.160. Policy TC3 (Protection of Local Facilities) is relevant within smaller settlements and exists to protect against changes of use of the last shop or public house.

6.161. For the next LDP, there is a need to identify these venues on the mapping.

Disused Railway Lines

6.162. The new legislative requirement to prepare a list of disused railway lines within the county will be complete for the next LDP. To date, it has not been possible to obtain an accurate map (or series of maps). As this is a new topic introduced by the Planning (Scotland) Act 2019, there are no existing policies within the LDP 2018 that cover the issue. However, as per NPF4 policy 13 (Sustainable Transport), the next LDP will be accompanied by a detailed Transport Appraisal. It is unclear at this point whether the appraisal will look specifically at the potential for re-opening disused railway lines within East Lothian. However, as the next LDP progresses, any realistic opportunities for doing so will be fully explored.

6.163. One of the main constraints to the re-opening of old railway lines will be the lack of infrastructure in place, with virtually all lines having been removed. Many of the routes are also now in use as shared walking, cycling and wheeling routes and therefore it would be a significant challenge to reinstate these lines. This is from both a cost perspective but also from the impact on the large number of people who use the footpaths. Furthermore, some of the old lines have since seen development near to them. Any proposal would require a detailed feasibility study to be carried out, together with environmental appraisal.

Public Toilets and Water Dispensers

6.164. The new legislative requirement to prepare a map showing the location of public toilets and water dispensers within East Lothian will be complete for the next LDP. Although it is not a specific policy within the NPF4, key aims such as reducing inequality and improving social inclusion particularly for disabled people are relevant for this topic.

6.165. East Lothian's public toilet facilities are fairly well dispersed across the county, with the majority of main settlements containing at least one public toilet within or close to the town centre. There are also public toilet facilities at most of the Council's costal parking locations. Some of these facilities are only recently constructed and provide not only toilets but also showers (outdoor) and changing facilities. There are also a number of toilets located within certain buildings that are publicly accessible, for example within retail stores, libraries- or medical facilities. These facilities are not proposed to be included on the final map of public toilet facilities.

6.166. Within the current LDP 2018, there are no policies specifically covering public toilets. Within the next LDP, it is not likely going to be necessary to have a dedicated policy on public toilet facilities. However, the Planning (Scotland) Act 2019 also introduced new requirements for certain public buildings to include provision for public toilets, showers and changing. This included specific requirements for disabled facilities. It may be necessary to create a policy to ensure this legislative requirement is met, however this needs to be more fully explored at the next LDP is prepared.

6.167. Water dispensers are limited in East Lothian. However, their importance is recognised in relation to providing an important basic need for communities, particularly as the climate changes and there are increased days of above average temperatures. Better provision of water dispensers also contributes to reducing waste through single use plastics, linking with NPF4 policy 12 (Zero Waste). Opportunities for adding in new water dispensing facilities as part of new or retrofitting of development will be explored. Scottish Water have also been involved in the provision of water drinking facilities within urban environments. There is potential for dispensers to be located at Journey Hubs, and this will be explored through working with the Council's Transport Service as well as Scottish Water. The next LDP will be prepared with extensive consultation and collaboration with Scottish Water.

Planning Obligations

Education

- 6.168. Noting that development allocated in East Lothian's LDP is ongoing and there has been and continues to be an associated education capacity expansion. The school expansion projects were based on school roll projections numbers on the Housing Land Audit 2016 build out rates for consented housing sites and allocated LDP residential sites. The Council undertakers annual school roll projections and Children's Service the LDP estimated school rolls projections have reduced since estimated in 2016. There are several reasons including the decrease in projected build out rates between 2019-24 due to COVID pandemic and economic factors, including the impact of the cost of living. This has meant that school roll projection peaks have been pushed back and the estimated number of pupils been generated has reduced overall however, there are exceptions in some areas where more children have been generated than initially projected, like in Letham in Haddington.
- 6.169. The Council programme for educational infrastructure delivery has been adjusted to ensure delivery at the appropriate time to ensure new pupils can be accommodated within the catchment schools. The Council will reserve the right to change the delivery timescales to take account of the relevant school roll changes and catchment circumstances. Noting that the Council will deliver the required additional facilities to accommodate the number of pupils generated from the development sites within the school catchment. The development sites are expected to cover the full cost of delivering the new infrastructure.
- 6.170. This has had an impact on the Learning Estate programming of school projects to ensure they are only developed when required.
- 6.171. The Council closely monitors school roll annually and projects future demand within catchments based on several factors however the Council often requires to decide on additional capacity years prior to breaches in capacity due to the long run-in period associated with construction and need for educational consistency for pupils during construction phases. The Council requires to determine decisions on the information available at the time of the decision. It is critical from a revenue budget that the Council does not build more than is required or this could have a negative impact on the learning estate through ongoing revenue costs.
- 6.172. The negative side to slower development rates is that school extension plans have been delayed yet the contributions have been paid or secured through S75 (fixed amounts) although indexed until payment. However, when projects require to be brought forward the construction and internal fit out cost have significantly risen well above interest and indexation rates, causing a funding gap.
- 6.173. East Lothian Council, like other local authorities in Scotland, is experiencing an increasing funding gap between the cost of infrastructure development and the contributions raised from new development as construction costs have risen significantly over the last 5-year period with the global pandemic, Brexit causing shortages in construction labour and fuel inflation. This has led to the Council requiring to meet the funding gap through capital borrowing, which is unsustainable just to deliver the additional infrastructure and community facilities required as result of new development. This does not include revenue funding. A two-stream primary school was delivered at Letham Mains for circa £12m in 2019 and in 2024 the cost of a two-stream primary (with core facilities to allow expansion to 3 stream) is over £23million each at Blindwells and Craighall.
- 6.174. In East Lothian, the developer contributions were secured under S75 agreements for the majority of LDP large-scale allocated sites were secured at 2016 Scottish Future Trust construction metric value and can only be increased by All in Tender Price indexation from the date agreed in the S75 until date of payment. Unfortunately, indexation has failed to keep up with construction cost inflation and the SFT metric value has been lifted twice above the indexation rate in the intervening period. Costs for school projects in 2016 were circa £3,000 per sqm. They are now significantly in excess of £5,000 per SQM. The Council have no ability to increase developer contribution already secured and developers are unwilling

to increased contributions through modifications to S75 as their development appraisals were undertaken based on the values within S75 and their own construction costs having increased more than their revenues. See Appendix 2.

6.175. The Council did not foresee the significant rising demand for ASN provision within East Lothian and in LDP2 this will need to be addressed through including a larger percentage of ASN primary and secondary where possible in each cluster. ASN provision is significantly more costly to provide as on average only 7 children per classroom whereas in mainstream an average classroom can accommodate 30 pupils. In addition, there needs to be more ancillary space required per pupil and more staffing. This has resulted in mainstream schools' capacity decreasing overall as ASN provision required to be extended or catered for within schools.

6.176. The Council will consider Education capacity and requirements for capacity as part of the spatial strategy once the Housing Land Requirements are finalised and site selection underway. The Council will undertake a full educational appraisal to ensure the right level of educational infrastructure provision to support the delivery of LDP2. The educational appraisal will inform the Delivery Plan by explaining what infrastructure is required to support the growth in residential development in East Lothian.

6.177. As part of this assessment the Council will undertake school roll projections based on the projected pupil output from each allocated site (based on indicative housing unit numbers for each site) and this will highlight the impact on the existing school roll projections within the catchment and highlight what additional educational capacity at early years, primary, secondary and across ASN would be required to accommodate the pupil generated from the development. This needs to consider the non-denominational and denominational requirements and the ASN requirements at all levels.

6.178. The learning estate must be flexible to meet the demand for places when school rolls are at their peak and make use of spare capacity when pupil numbers reduce. Our educational statistics highlight trends in certain localities however growth and decline of school rolls across the learning estate have not been uniform often causing localised pressures. The Council is trying through site allocations to utilise existing capacity as effectively and efficiently as possible, whilst considering the overall condition of the estate, however, one tool available is to change catchments but this requires a statutory consultation process under the School (Consultation) (Scotland) Act 2010, and we must consider the 20-minute neighbourhoods and equity when making decisions.

6.179. Education and Children's Services with Strategic Asset team will then design and calculate the estimated cost of providing the additional education capacity required for the housing allocated sites at that time. The cost will then be proportionally divided to provide a cost per unit for the required educational financial contribution for that site. Clearly as the costs will increase over time and usually above indexation the Council these costs will only be indicative and will be calculated individually for each site at the time planning applications come forwards to ensure any cost rises associated with the delivery of further educational space solely required for a residential development is borne by the developer not the public purse, as this impacts the delivery of essential council services.

6.180. If land is required for the expansion of the school or for a new school the cost of the land will also be proportionally attributed to allocated development on a per unit basis and in line with the policy tests in Circular 3/2012, as revised.

Sports and Changing

6.181. Overall, the Council's LDP policies have been successful across clusters at securing additional sport pitches and changing facilities to help ensure there is sufficient to serve the people generated from the new development across clusters, without negatively impacting on the existing population. Although financial and land contributions have been secured through S75 for sports facilities some are still to be developed and transferred to the Council and after completion and only then can we review their usage.

Due to the construction cost raises there are concerns that the contributions secured will not be sufficient to implement the facilities required unless the Council subsidised the projects.

- 6.182. The delivery mechanism has been varied across sites with developers' delivery completed pitches whilst others opting to provide the land and financial contributions. To reduce the risk for the Council in LDP2 facilities that are required on site should be developed by the developer to the Council's specifications to ensure inclusive for all and where appropriate facilities should be shared between schools/ other public buildings to increase community access to provision and reduce overall maintenance and revenue costs

Health Facilities

- 6.183. Currently the Council has not collected any contributions for additional community health facilities across East Lothian however pressure is growing on our primary health care facilities and in LDP we will work closely with the East Lothian Health and Social Care Partnership and NHS Lothian to address any deficiencies or additional facilities required in associated with growth.
- 6.184. Currently a Health appraisal is ongoing and the evidence with the NHS and East Lothian Council estate plans will help determine if land and development contributions will be necessary in the future to ensure our communities have the necessary provision within 20-minute neighbourhoods.

Open Space

- 6.185. There have been significant additional play facilities developed within new developments and from financial contributions received in associated with new development to help ensure that residents of all ages and abilities have the required facilities across East Lothian.
- 6.186. However, from feedback from communities sometimes the open space is not as connected and useful as it could be therefore in LDP2 it is critical that we ensure open space is defined further to ensure that new developments have sufficient levels of appropriate open space that encourages improved health, wellbeing, air quality and biodiversity.
- 6.187. LDP highlights that allotments are also required in development of over 500 units and PROP OS6 highlights the sites which require these. The Council has received land for allotments at North Berwick and land and contributions secured for an allotment site through S75 at Blindwells. However overall, we need to help facilitate food growing opportunities at settlement level and LDP2 should help through identifying areas where this may be possible and to ensure new housing development include land for allotments and growing community spaces proportionate to the size of the site and suitable for the intended purpose.
- 6.188. The open space audit will help inform where there are

Strategic Transportation

- 6.189. In terms of transportation infrastructure, the Council has only implemented some of the strategic interventions identified in LDP as the sums raised through contributions have not been sufficient to date to enable works, as the Council does not have the finance capacity to undertake the works until sufficient contributions are collected. Since COVID 19 pandemic there have been significant transport pattern changes due to overall population's working patterns reducing pressures on the transport network with considerably more individuals working from home or on more flexible times rather than set working patterns. In some cases, intervention is only now being required and as part of LDP2 transportation modelling the strategic interventions requirements identified in LDP will be reviewed and updated to reflect these changes and modal shifts. This will apply across transport modes.
- 6.190. This funding gap created from S75 (fixed) contributions and massive increases in construction costs is putting considerable strain on the Council's ability to undertaken infrastructure first when capital

funding is being utilised to build necessary LDP infrastructure, where previously the developer contributions would have fully covered but are only covering 50% of costs, which is reducing further over time.

- 6.191. Methodology to undertake new transport modelling, including all the LDP allocated site still to be developed but included in LDP2 and windfall sites with planning permission but not implemented and input the LDP 2 proposed allocated sites commercial and residential. The Council's aim will be to shift trips from private cars to more sustainable modes of transport in line with sustainable transport hierarchy.

Infrastructure First approach in NPF4

- 6.192. The Council is keen to align with the infrastructure investment hierarchy, utilising existing infrastructure capacity first before requiring additional capacity therefore the Council will be trying to locate new development where there is capacity. However, the Council acknowledge that not all parts of East Lothian infrastructure will have capacity in the same localities and investment will need to be made. Through partnership working with utility companies service providers and partners, including cross boundary to ensure the infrastructure is delivered that is required for growth. New development will only be acceptable where it is contributing fully to the infrastructure and community facilities required to support it, whether individually or through cumulatively. Where possible new development will be within 20 minutes of key services and additional community facilities where possible utilise existing hubs or share community space to help foster community life, reduce travel, and increase health and wellbeing.
- 6.193. In terms of transportation there will be a focus on delivery the sustainable travel hierarchy with an aim to promote sustainable modes of transport to help achieve climate targets and encourage healthier lifestyles. We will work closely with our adjoining authorities to improve the active transport networks. Development will be encouraged to be located where there are alternative options to the private car to create active travel routes within sites, provide financial contributions to ELC to help provide missing links between routes and new linkages. Contributions will be sought from new developments depending on the distance from the transport measure, type of development and scale of the development and in which contribution zone the development lies within.
- 6.194. Where additional land out with developers control the Council is able and willing to deliver the infrastructure however, the full cost of such action including land acquisition costs will be sought from the relevant developers.
- 6.195. The Council will where appropriate request the developer to directly undertake delivery of the transport measure required if only related to their site and not cumulatively impacted.
- 6.196. The Council wants to establish 20-minute neighbourhoods and reduce the use of private cars with the promotion of active travel and public transport. East Lothian however as a large rural community which to reduce reliance of private cars it is important to strengthen public transport links and create multi-modals hubs to allow people to reduce the distance they travel in private cars and utilise alternative modes which are more sustainable. The Council will promote walking, wheeling, and cycling within our towns, between settlement and at transport hubs to support and encourage transition away from private car.
- 6.197. The Council will seek development contributions from new development both individually and cumulatively that give rise to the need for new or improved infrastructure and community facilities. The Council proposes to allocate land to ensure that existing capacity is used first. However, the Council recognises that cluster areas may have capacity in terms of schools but restrictions in terms utilities. Changing roll projections, significant increase in ASN provision since 2016 and discovery of RAAC in some schools combined with the PPP partnership ending in 2035 may result in potential changes to school capacity and a need for new schools and current school catchments changes. It is not possible at this

stage to highlight the level of contributions as these need to be based on the location of LDP2 allocated sites and the existing service and facilities available in the locality.

- 6.198. The SG Developer Contribution Framework has been helpful and utilised by internal planners and applicants and their agents to help them determine the approximate level of contributions their proposals would generate. The document however does state likely contributions as individual assessment are need for all planning applications to ensure that the developer is paying the appropriate level of contribution based on the 5 planning tests.
- 6.199. The Council was planning to use the Infrastructure Levy to gain contributions towards biodiversity, green networks, and climate change adaption project however the Scottish Government decided that they will not be introducing the levy but updating and replacing the existing revised Circular 3/2012 in late 2025. However, the Council is now looking at how we can evidence the requirements at settlement level and cost them taking into account any existing deficiencies to through ensure delivery of key supporting green and blue infrastructure.
- 6.200. The Proposed Plan will set out the infrastructure and service provision necessary in connection with LDP2 allocated sites, where these are known. There will be contribution zones in the LDP2 to highlight where certain contributions will be applied to new developments and the outline methodology for the calculation of contributions (cost of infrastructure associated with development divided across contributing developments). Accompanying the Proposed Plan, Supplementary Planning Guidance will be produced stating the likely costs within contribution zones on a per unit basis.
- 6.201. The methodology will be similar to that used in LDP1 to determine the value which will involve work with service and infrastructure providers to assess the impact of the LDP2 proposals and calculate how much additional infrastructure and community facilities will be required, how much it will cost to provide and how and where it should be delivered within East Lothian to support development.
- 6.202. The Council will only seek developer contribution where they meet the 5 planning tests to overcome the transport, educational, community, healthcare and environmental constraints that arise from developments on an individual and cumulative basis. Noting one development can impact a number of different types of infrastructure and facilities and the developer will require to mitigate against this impact individually and where necessary cumulatively with other developments through a proportionate share relative to the scale and nature of the development.
- 6.203. The Council will collaborate with other key partners to help make use of existing facilities and infrastructure but will require to seek contributions were there is no capacity available from developers. As in the existing LDP, the Council will look to provide the additional infrastructure and facilities and can be provided through in kind contributions, financial contributions, accumulated contributions and through commuted sums for affordable housing when not provide on-site or in an agreed alternative site. The Council has assisted that the applicant/ developer must provide a commitment to providing the necessary contributions prior to any planning application being approved.
- 6.204. The impact of the allocated LDP2 sites will be analysed and service and infrastructure providers will have had the opportunity to calculate the additional infrastructure and services requirements generated from the new development. Where possible existing capacity will be utilised and any existing assets more effectively to maximise their capacity and where possible sharing space between services and partners. Clearly the actual amount of development on each allocated site is indicative until a planning application is submitted. However, the required LDP2 the infrastructure and facilities needed for the allocated sites will be estimated using modelling based on the indicative capacity of sites. Infrastructure and facilities projects and costs will be proportioned to only charge developers of LPD2 sites on an individual or cumulative basis, discounting any existing capacity deficits. The developer contribution value will be calculated. In limited and certain cases where the infrastructure is stand-alone (not an extension) and is only required to serve one, or a small number of developments, there may be cases for an alternative developer delivery models to agreed Council specification rather than Council delivery through

financial contributions. This will pass the direct responsibility and financial risk onto the developer. Council oversight into delivery would be required by clerks of works.

6.205. The LDP2 will safeguard land which is required to provide the necessary infrastructure or facilities.

6.206. The evidence stage for LDP2 has helped identify where there are currently capacity issues, projected to be capacity issues in Education, Amenities, Transportation and Healthcare. Consideration has been given to making shared use of some facilities and to maximum the capacity of others through innovative approaches to sharing space and designing spaces to have multiple uses purposes. Health infrastructure capacity must be considered in site selection and phasing. NHS Lothian data shows that some GP practices are nearing capacity, and co-location of services may be necessary to support growth.

6.207. The LDP2 Delivery programme will identify infrastructure and community facilities projects providing indicative timescales. The timescales will be equally dependent on new development build rates to provide finance through developer contributions and to ensure only infrastructure and facilities are developed when required. Health outcomes such as life expectancy, obesity, and mental health should be monitored in relation to spatial planning decisions. Collaboration with NHS Lothian and ScotPHO will support evidence-based policy adjustments.

6.208. The growth in LDP required significant increase in the infrastructure capacity within the six spatial clusters within East Lothian. The LDP policy DEL1: Infrastructure and Facilities Provision clearly highlights that new development will only be permitted where it makes a makes appropriate provision through financial, in kind and land contributions to provide the necessary new infrastructure (interventions) necessary to for the development. The Supplementary Guidance: Developer Contribution Framework highlights the nature and scale of the developer contributions required in association with allocated developments. However, the exact nature and scale of developer contributions are worked out on a case-by-case basis including for windfall sites. infrastructure requirement to support the growth within the contribution zones across East Lothian.

6.209. The LDP highlights in policies the educational requirement for each cluster from pre-school to secondary based on roll projections in 2016 and LDP Technical Note 14 calculates the cost of infrastructure development at that point in time, which is translated through the SG:DCF into likely contributions per unit for LDP allocated sites.

Education, Community & Health, and Social Care Facilities

New Education Provision

	Delivered Through LDP1 from full or partial S75 contributions.	Secured S75 towards
PROP ED1: Musselburgh Cluster		
Part A- New secondary school within expanded Wallyford area	Part of the Wallyford Learning Campus the new Rosehill High School opened in August 2023 – Phase 1 capacity 950 pupils	Rosehill Phase 2 – Planned to be started in 2032/33 to increase school capacity to 1250
Part B- New pre-school and primary provision	a) New Wallyford Primary School Phase 1 was opened 2019. b) Craighall Primary School – Land for school transferred to Council in 2023 and development of school Phase 1 commenced in	a) Wallyford Primary Phase 2 – planned to expand school in 2029/30 b) Craighall Primary Phase 2- Planned to start in 2034 to open in 2035 to provide an additional 5 Classrooms if required

	<p>2024, and school is due to open August 2025</p> <p>Note: Craighall Primary School construction costs are significantly higher than the contributions due to be collected as the contributions were secured in 2018 with indexation which has not taken account of the significant rise in construction costs: materials, energy and labour costs which have increased over 40% over the 3-year period prior to construction contract being completed.</p>	<p>Craighall School Contributions are ongoing as they are linked to housing completion rates.</p>	
Part C			
PROP ED2: Prestonpans Cluster			
Part A – Additional Permanent Extension to Preston Lodge	<p>School due to breach capacity in 2034</p> <p>-In 2023 RCC was found in the school and measures taken to address this but raised concerns regarding the long-term future of this school.</p> <p>- Under review to find solution.</p> <p>- Cost of planned extension increased from £8.1m in 2016 to over £20.5m in 2025.</p>	<p>Some developer contributions paid and further secured for this extension from catchment allocated sites. (£8.6m), including from Blindwells (BW1).</p> <p>However over £12m funding gap currently and this is likely to increased prior any work commencing.</p>	
Part B- Additional pre-primary and primary provision	<p>-Contributions sought to provide permanent additional capacity at Longniddry Primary School</p> <p>- Longniddry Primary school extension required by 2029 with designs work commenced.</p>	<p>Contributions paid and further secured for Longniddry Primary school including pre-school element from Longniddry South Development. Plans currently being developed to reconfigure and extend this school prior to projected breach.</p>	
PROP ED3: Blindwells			
Part A	<p>- (i) Secondary school accommodation at Preston Lodge (see comments above). £1.79m of developer contributions collected to date for secondary provision from Blindwells, with a further £5m indexed linked to be collected under S75)</p>	<p>a) Blindwells Primary Phase 2 will be developed if required prior to projected breach in 2031.</p> <p>Cost of Phase 1 has utilised all developer contributions gathered for Blindwells as cost increase have outstripped indexation leaving the Council significant funding gap to develop required infrastructure.</p>	

	<ul style="list-style-type: none"> - (ii) Temporary pre-school and primary at Cockenzie Primary School- This school has been hosting since 2021. - (iii) Permanent Pre-school and primary – Land for the primary school was transferred to the Council in 2023 and the school, phase 1 (2 stream) is under construction and is due to open in August 2025. To date £6.597m collected towards primary provision with a further £10.945m indexed to be collected under S75) - Blindwells Primary School construction costs are significantly higher than the contributions due to be collected as the contributions were secured in 2018 and only indexed which has not taken account of the significant rise in construction costs: materials, energy and labour costs which have increased over 40% over the last 3-year period. The costs do not account for the Councils borrowing costs as the school will be finished construction 9 years prior to last primary contribution. The Council therefore has required to pay the gap in funding between the contributions and the actual built cost. Noting that phase 2 		
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	(additional 5 classrooms) has not been developed to date but projected to be required by 2031 with an approximate cost currently of £10m.		
Part B	<p>If BW2 (circa 6,000 units) comes forward, there will be a need for the following facilities</p> <ul style="list-style-type: none"> -(i) new Secondary School -(ii) at least three further primary schools <p>All land and costs associated with the new educational facilities for BW2 will be sought from the developers. The delivery model is to be agreed prior to any commencement of development.</p>	The Council are currently pulling a Strategic Outline Business Case with Scottish Futures Trust for government funding for the infrastructure for further Blindwells development to the east of the existing development.	
PROP ED4: Tranent Cluster			
Part A	<ul style="list-style-type: none"> - Extension to Ross High-Extension completed in 2023 and still collecting contributions for Allocated LDP sites. 		
Part B- Pre-school and Primary	<ul style="list-style-type: none"> - Windygoul Primary school – Extension required after 2030, and contributions have been secured from allocated sites with planning permission. Development not started to date. - Elphinstone Primary School- Extension required to accommodate residential development at TT11. Design underway currently and required by 2027 as recently further approval for further 111 units at Phase 2. Developer 	<p>Secured contributions</p> <p>Secured primary contribution from TT11- £ 2m.</p>	

	<p>contributions secured under section 75.</p> <p>-Macmerry Primary School- Developer contributions secured from North Macmerry allocated site.</p> <p>Education currently looking at reconfiguration/ extension proposals for school as due to breach in 2028.</p>		
Part C	<ul style="list-style-type: none"> - The Council will secure additional phased permanent extensions to pre-school and primary as required - Pencaitland Primary school is currently being reconfigured and extended to provide a further permanent classroom and associated ancillary space. Developer Contributions are paying for this work as only required due to new development within settlement. - Extension to Ormiston PS was completed in 2022 to increase capacity. 	<p>Work being undertaken in 2025/26 to Pentcailand Primary School to create additional classroom and ancillary space.</p>	
PROP ED5: Haddington			
Part A – Permanent Extension to Knox Academy	The site investigation and design work are commencing on Knox Academy in 2025 with the reconfiguration and extension being constructed in the late 2020s.	Over £6 million pound in contributions have been secured for this extension from developer contributions.	
Part B- Pre-school and Primary	Land and developer contributions were secured through S75 for Letham Mains Primary School opening in 2019 with nursery and two streams. A further extension is to be added over the next three	Plans are currently being agreed for the extension of Letham Primary School with the extension projected to be completed in 2027/28.	

	years to increase capacity to accommodate children generated from Letham Extension. The initial school was developed and paid for by developer contributions only.	Concerns that developer contribution secured not enough to paid for required extension.	
Part C- The Council will provide additional pre-school and primary permanent extensions where there is a requirement arising from new residential development and the developer will be requested to pay contributions to cover these costs.	Some internal reconfiguration works have been undertaken to Haddington Primary School to increase its capacity to accommodate children generated from new developments within the catchment.		
PROP ED6: Dunbar Cluster Education Proposals			
Part A	The Council to provide additional phased permanent capacity at Dunbar Grammar school. The Council has previously extended Dunbar Grammar in 2008 and has collected contributions under LDP to reconfigure and extend the school further to accommodate the pupils generated from the LDP allocated sites and windfall sites. The school roll is under review annually and when further measure to increase capacity will be needed to avoid breaches.		
Part B	<p>The Council will provide additional permanent pre-school and primary provision to meet rising demand from new housing developments in catchments.</p> <p>The Council has sought contributions towards several schools within the Dunbar Cluster with extension works completed at West Barns Primary extending capacity.</p>		

	<p>Works are planned for East Linton Primary school in short term to increase capacity.</p> <p>Preliminary under design for Dunbar Primary (John Muir lower primary) to remove use of Temporary Units and extension accommodation including ASN provision.</p> <p>And further expansion of capacity at Dunbar upper (Lochend) Primary are being considered currently.</p>		
PROP ED7: North Berwick Cluster Education Proposals			
Part A	<p>The Council to provide additional permanent accommodation at North Berwick High School which was the majority was completed in 2024 with only the sport facility still to be extended, the extension was partially paid from developer contributions from housing development within the cluster boundary.</p>	<p>Further expansion of the Sports facilities is planned once further contributions have been received which will increase capacity of the school.</p>	
Part B- The Council has provide as set out in LDP policy additional pre-school and primary provision.	<p>Additional capacity has been delivered at Law Primary School for pre-school. An extension at Gullane Primary School has created the additional capacity to accommodate the LDP sites .</p> <p>Developer contributions were sought and used towards this extension. There is still retrospective contribution being collected as not all trigger points in S75 agreements have been reached when the extension was built at Gullane PS.</p>	<p>The Council has sought contributions for the extension of Aberlady primary school from LDP site NK10 and this extension is due to commence in 2025/26. However, the cost of the extension is significantly more that the developer contributions received due to the escalation of construction cost over the last 5-year period.</p>	
Community Infrastructure			
Sports facilities and changing accommodation			
PROP CF1: Provision of New Sports Pitches and Changing Accommodation. (LDP page 84)			

Part A	<p>Land for sports and changing facilities within developments.</p> <p>Craighall (MH1)– 3 full sized grass pitches, pavilion, and associated car parking.</p> <p>Pinkie Mains (MH6)- one seven aside grass pitch</p> <p>Wallyford (MH9)– Sports pitches provided, and changing facilities planned.</p> <p>Dolphingstone (MH10)–One sports Pitch</p> <p>Land at Whitecraig to be transferred to enable new pitch to be formed (MH14)</p> <p>Longniddry South- one full sized grass pitch .(PS1)</p> <p>Blindwells (BW1)</p> <p>Windygoul South (TT1) one full grass pitch and changing facilities within adjacent school.</p> <p>Elphinstone TT11 site.</p>	<p>The land for the sports pitches and pavilion has been transferred to Council and the sports facilities are under development at Craighall.</p> <p>Grass Pitch about pitch within Pinkie Mains Park.</p> <p>3G and grass pitches delivered, changing under development.</p> <p>Share facilities with Wallyford site.</p> <p>Whitecraig South application currently being considered, and land included in layout for sport pitch adjacent to existing recreation ground. Contribution being sought for development of sports facilities.</p> <p>One full size grass pitch secured through S75 agreement which will be transferred completed to the Council one trigger is reached at 400th housing unit completion.</p> <p>At Blindwells there are significant sports facilities secured through S75 to provide in Infrastructure phase 3 which should commence in 2026 as linked through triggers in S75 to housing completion numbers.</p> <p>Land for the Sports pitch and associated contribution paid and plans to implement within S75 timescales.</p> <p>Contributions secured to enhance existing sport facilities adjacent to site and the site will provide turning area and car parking within approved layout to the existing facilities. Project will be delivered after all contributions paid.</p>	
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	<p>Letham Mains (HN1)</p> <p>Letham Mains Extension (HN2)</p> <p>Hallhill North (DR2)</p> <p>Saltcoats (NK7)</p>	<p>A full-size grass pitch and changing pavilion were developed and transferred to the Council last year.</p> <p>Seven aside grass pitch has been developed and will be transferred to Council in summer 2025.</p> <p>Sports land transferred to Council in 2025, and most sports provision contributions have been received. The Council has started development of the sports facilities, and this is ongoing in 2025.</p> <p>A seven aside pitch area and associated contribution have been secured through S75 and this is anticipated to be developed over next five-year period.</p>	
Health Care Facilities Proposals and contributions			
	<p>Longniddry South (PS1)</p> <p>Blindwells (BW1)</p>	<p>Contributions were secured through s75 towards additional medical facilities associated with the population growth within this area. The trigger for this contribution has not been reached to date.</p> <p>There is accommodation available within the Town Centre however there has been no agreement between NHS Lothian and developer to having medical facilities located.</p>	
Open Space and Play Facilities			
Policy OS3: Minimum Open space standard for new and general needs Housing Section 2	The Council has received £--- in contributions over LDP 1 which have been utilised to enhance and extend existing play areas to increase their play, quality, and capacity to service the new developments.		
Policy OS4 Section 2: off-site play enhancement	Toddlers play area at Lamberton Court and Pencaitland Park Play area enhancements, Gullane Memorial park new play equipment and sports enhancement underway, new Wallyford play area adjacent to	For smaller sites further off-site contributions have been secured to enhancement and extend play provision with East Lothian to increase capacity to accommodate new residents.	

	primary school and Pleasance Play area, Aberlady	Contributions secured for recreational purposes for Memorial Park in East Linton which is planned to be spend in short term.
PROP OS6: Allotment sites	<p>Tantallon Road site, North Berwick contributed land for allotment development within housing site.</p> <p>Blindwells have are requirements to provide an allotment site in Phase 3.</p> <p>Windygoul South have provided financial contribution to created additional allotment provision in Tranent.</p>	Land transferred in 2024 to Council of Hobens Drive.
Strategic Transportation		
New Station At East Linton (PROP T12)	Land secured through S75 associated with Orchardfield site to deliver park and ride facility adjacent to new railway station accessed through Andrew Meikle Grove. Land transferred from developer to Council.	Delivered 2024 with associated car parking
Longniddry – Haddington Route Safeguard	Financial contribution secured from Longniddry South development towards improvements to path.	Contribution received in 2025 and will be spent within S75 timescales.
Policy T32 – Transport Infrastructure Infrastructure Delivery Fund	A package of transport interventions to mitigate the cumulative impact of development on the transport network were identified in LDP 1	There have been considerable Strategic transport financial contributions been made and further secured through S75 towards these interventions. Currently there is £900,000 paid by April 2024 and a further £3.5m being sought.

AREAS WHERE THERE IS AGREEMENT OR DISPUTE ON ISSUES AND POSSIBLE APPROACHES.

6.210. There are no disputes on the evidence as part of the Spatial Strategy and Infrastructure chapter of the Evidence Report. Through consultation, the following Key Agencies have confirmed they support the evidence provided or have not raised any disputes:

- HES
- NatureScot
- Scottish Water
- SEStran
- Scottish Enterprise
- Lothian Health Board
- Scottish Forestry (Through development of Tree and Woodland Strategy)

Appendix 1

East Lothian Health and Social Care Partnership

Practice name	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	% Change 2012-2024
Tyne MP	5,614	5,703	5,684	5,772	5,879	5,986	6,138	6,280	6,385	6,423	6,606	6,677	6,841	21.9%
Gullane MP	4,982	4,974	5,009	5,101	5,184	5,224	5,178	5,197	5,332	5,549	5,795	5,920	6,016	20.8%
Riverside MP	9,170	9,330	9,479	9,604	9,805	10,073	10,302	19,456	19,740	19,832	19,661	19,761	19,969	11.4%
Eskbridge MP	8,759	8,797	8,702	8,683	8,764	8,862	8,738	*						
The Harbours MP	9,835	9,771	9,412	9,514	9,910	9,988	9,948	9,845	9,767	9,723	9,790	9,759	9,861	0.3%
Lammermuir MP	4,817	4,777	4,747	4,690	4,592	4,628	4,624	4,712	4,847	5,012	5,277	5,503	5,642	17.1%
Whitesands MP	4,413	4,396	4,384	4,406	4,456	4,572	4,721	4,783	4,866	4,964	4,991	4,972	4,981	12.9%
The Orchard MP	4,680	4,623	4,675	4,679	4,676	4,694	4,785	4,950	5,135	5,269	5,383	5,527	5,578	19.2%
Prestonpans MP	8,402	8,590	8,828	8,771	8,638	8,678	8,794	9,004	9,207	9,311	9,374	9,450	9,769	16.3%
North Berwick MP	7,831	7,858	7,907	8,021	8,154	8,266	8,504	8,832	9,069	9,361	9,611	9,674	9,724	24.2%
Inveresk MP	8,436	8,503	8,637	8,702	8,727	8,712	8,758	8,970	8,959	8,980	9,412	9,940	10,502	24.5%
Lauderdale MP	3,373	3,433	3,471	3,528	3,619	3,689	3,769	3,957	4,046	4,143	4,220	4,288	4,376	29.7%
Cromwell Harbour MP	3,742	3,740	3,781	3,809	3,893	3,991	4,105	4,280	4,475	4,687	4,883	4,942	4,942	32.1%
East Linton MP	2,488	2,511	2,513	2,564	2,677	2,726	2,717	2,747	2,776	2,828	2,897	3,003	3,079	23.8%
Ormiston MP	3,177	3,145	3,179	3,190	3,168	3,201	3,202	3,325	3,426	3,645	4,049	4,204	4,280	34.7%
Tranent MP	13,136	13,478	13,854	14,005	14,079	14,191	14,355	14,258	14,270	14,190	14,044	14,099	14,171	7.9%

East Lothian Total	102,855	103,629	104,262	105,039	106,221	107,481	108,638	110,596	112,300	113,917	115,993	117,719	119,731	16.4%
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Appendix 2

			Can current building accommodate practice population			Proportion of current Practice list size		
Building Name	Practice list size at 01/04/2025	Size of building m2	grow by up to 1500 additional	grow by 1500 to 3000 additional	grow by 3000 to 4500 additional	grow by up to 1500 additional	grow by 1500 to 3000 additional	grow by 3000 to 4500 additional
Cockenzie HC	The Harbours MP - 9962	964	Yes	Yes	Maybe (dependent on other services relocating)	up to 15% growth	up to 30% growth	up to 45% growth
<p>Practice currently has room to grow as a result of an extension that was completed in 2022.</p> <p>There are non GP services within the building which could be considered for relocation to make additional space available but GPs likely to push back on removal of some of those services. There is a high risk that there will be no building(s) for those services to move to.</p>								
Prestonpans HC	Prestonpans MP - 10069	792	Yes	Maybe (dependent on other services relocating)	No	up to 15% growth	up to 30% growth	up to 45% growth

All the available rooms have already been converted, so any additional space would need to be in another building (for example portacabins). Very limited available space around the health centre though to place those and the building previously had an extension.

There are non GP services within the building which could be considered for relocation to make additional space available but GPs likely to push back on removal of some of those services. There is a high risk that there will be no building(s) for those services to move to.

Tranent HC	Tranent MP - 14207	1114	Yes	Yes	Maybe (dependent on other services relocating)	up to 11% growth	up to 21% growth	up to 32% growth
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Two rooms could be converted from interview room to consulting room but all other rooms have been converted already. Any additional space would need to be in another building (for example portacabins). Some space exists around the health centre though to place those and building previously had an extension. Building has backlog maintenance outstanding.

There are non GP services within the building which could be considered for relocation to make additional space available but GPs likely to push back on removal of some of those services. There is a high risk that there will be no building(s) for those services to move to.

North Berwick HC	North Berwick MP - 9655	730	Yes	Maybe (dependent on other services relocating)	No	up to 15% growth	up to 30% growth	up to 45% growth
<p>All the available rooms have already been converted, so any additional space would need to be in another building (for example portacabins). The site is shared with the Edington Hospital and as such this is almost no space within the grounds. There are non GP services within the building which could be considered for relocation to make additional space available but GPs likely to push back on removal of some of those services. There is a high risk that there will be no building(s) for those services to move to.</p>								
Dunbar MC	Cromwell Harbour MP - 5070 Lauderdale MP - 4500 Whitesands MP - 4863	1585	Yes	Maybe (dependent on other services relocating)	No	up to 10% growth combined	up to 21% growth combined	up to 31% growth combined

Opportunity to develop space within attic to allow more non-clinical space freeing up clinical space in main part of building. All other rooms have already been converted, so any additional space would need to be in another building - there is limited space around the current building.

There are non GP services within the building which could be considered for relocation to make additional space available but GPs likely to push back on removal of some of those services. There is a high risk that there will be no building(s) for those services to move to.

Gullane MC	Gullane MP - 6112	812	Yes	Maybe	No	up to 25% growth	up to 49% growth	up to 74% growth
<p>Practice currently has room to grow within building. The building is fairly modern.</p> <p>The building contains little non-GP services, so no opportunity to make additional space available within the building.</p>								
Newtonport Surgery	Lammermuir MP - 5636 The Orchard MP - 5638 Tyne MP - 7052	1195	Maybe	No	No	up to 8% growth combined	up to 16% growth combined	up to 25% growth combined

All the available rooms have already been converted, so any additional space would need to be in another building (i.e. additional portacabins (there are some already onsite or an extension which would require purchase of surrounding land). Existing building requires modernisation since not been refurbished since 1980s. Lease due for renewal in July 2026.

The building contains little non-GP services, so no opportunity to make additional space available within the building.

MPCC	Inveresk MP - 11257	6407	Yes	Yes	Maybe (dependent on other services relocating)	up to 13% growth	up to 27% growth	up to 40% growth
	Riverside MP - 20136		No	No	No	up to 7% growth	up to 15% growth	up to 22% growth

Inveresk - remove medical notes from building space and reconfigure for additional non-clinical space to free up clinical space.

Riverside - all available space has been utilised, and they have no non-GP services within their footprint, so any additional space would need to be outside of that footprint.

Ormiston HC	Ormiston MP - 4439	523	Yes	Maybe	No	up to 34% growth	up to 68% growth	up to 101% growth
<p>Practice currently has room to grow within building. The building is fairly modern.</p> <p>The building contains little non-GP services, so no opportunity to make additional space available within the building.</p>								
East Linton Surgery	East Linton MP - 3116	273.6	Yes	No	No	up to 48% growth	up to 96% growth	up to 144% growth
<p>Practice could convert one room in the building into a consulting room. The practice size is small and the addition of another consulting room (based on 1500 per GP) will result in significant capacity but the building has no further room for growth within the footprint of the building and grounds.</p> <p>The building contains little non-GP services, so no opportunity to make additional space available within the building.</p>								

Appendix 3

	Primary School Costs per Sqm	Increase in % terms of Primary Education Costs from secured contributions indexed at Q2 2025 to the SFT cost metric and Actual Costs	Cost Difference per Sqm for Primary Schools between Secured indexed contribution and SFT metric or Actual Construction Price	Secondary School Costs per Sqm	Increase in % terms of Secondary Education Costs from secured contributions indexed at Q2 2025 to the SFT cost metric and Actual Costs	Cost Difference per Sqm for Secondary Schools between Secured indexed contribution and SFT metric or Actual Construction Price
East Lothian Council cost for construction of school per sqm in LDP and amount secured in majority of S75 agreements	£3,000.00			£3,000.00		
Contribution value of S75 education contributions secured at £3000per sqm with indexation at Q2 2025. Using BCIS All-in Tender Price Index	£3,634.44			£3,634.44		
SFT rate in Q2 2025	£5,057.66	39.2%	£1,423.22	£4,214.00	15.90%	£579.56
Actual Construction Cost for school in Q2 2025- SE Hub information and	£6,197.56	70.5%	£2,563.12	£5,820.67	60.20%	£2,186.23

include fees , fit out and inflation						

