

REPORT TO: Cabinet

MEETING DATE: 13 November 2018

BY: Depute Chief Executive (Partnerships and Community

Services)

SUBJECT: East Lothian Open Space Strategy 2018

1 PURPOSE

1.1 To set out the background to and seek Cabinet approval of the East Lothian Open Space Strategy.

2 RECOMMENDATIONS

2.1 That Cabinet notes the content of this report and approves the East Lothian Open Space Strategy 2018.

3 BACKGROUND

- 3.1 Parks, sports pitches and open spaces form a central part of East Lothian's landscape character. They make a significant contribution to improving the physical and mental wellbeing of the local community and visitors alike. They are multi functional spaces that are used by many people in many ways and bring economic benefits to East Lothian through tourism.
- 3.2 Scottish Planning Policy: Open Space and Physical Activity sets out the Government's policy on open space provision. The key objectives of the SPP include a requirement on Local Authorities to undertake an open space audit and prepare an open space strategy. The SPP emphasises the need for local authorities to take a strategic and long term view of open space and sports provision to ensure that the current and future needs of communities are met. The East Lothian Open Space Strategy has been prepared according to SPP and PAN65 Planning and Open Space that underpins the SPP.
- 3.3 Consultants Ironside Farrar have supported the council in building upon and refreshing previous work undertaken in auditing Open Space and developing Open Space and Sports Pitch Strategies. All of this previous

work has helped inform the East Lothian Open Space Strategy 2018 and provides the evidence base for open space in respect of the policies and proposals of the Local Development Plan. Appendix 1 contains an Executive Summary of the East Lothian Open Space Strategy 2018.

- 3.4 The Strategy has identified 8 strategic objectives, which reflect the key policy areas to be addressed over the lifetime of the Strategy in relation to the provision and management of open space.
 - ➤ Healthier communities: strengthening the accessibility to multifunctional open space and sports facilities to promote health and wellbeing and encourage more physical activity and promote Active Travel.
 - ➤ Green networks: enhancing the green network capacity and connectivity offering a high quality natural environment for people, wildlife and biodiversity, with access to the countryside via the core path networks.
 - Sustainable growth and regeneration: improving the profile, image and quality of place to improve its competiveness as a location to visit, live and invest through the creation of high quality environments that attract economic development.
 - Quality open spaces: providing a high quality network of welcoming, diverse, attractive, accessible and connected open spaces, providing opportunities for sport, children's play, physical activity, relaxation, education and local events close to where people live.
 - Natural heritage: protecting and enhancing places where biodiversity, diverse habitats and wildlife can flourish, though sensitive management of public access.
 - Climate change: creating an environment that is more in balance, helping to moderate climate change and enabling flood and coastal management.
 - ➤ Community development: encouraging involvement in the design and management of open space through greater engagement and interaction with local communities.
 - Management: managing East Lothian's open spaces and sports facilities in a cost-effective manner, involving the prioritised allocation of resources and community involvement.
- 3.5 The Strategy establishes a set of open space standards that have been carefully benchmarked with national and Scottish local authority standards. This reflects Scottish Planning Policy and should bring a wider range of benefits to the Council, including securing a consistent and transparent approach to open space provision within the development planning and development management processes. Allowing planners to identify whether developer contributions to open space provision should focus on quantity, quality or accessibility and can also inform whether that

provision should be provided on or off site where appropriate. This clarity of application can be monitored over the life of the Open Space Strategy and LDP.

- 3.6 The open space standards have been applied and analysed by type on a Cluster Area basis. They seek to assess:
 - Quantity standard if there is enough open space and if it is equitably distributed.
 - Quality standard –if the open space is 'fit for purpose'. All communities have access to high quality open space.
 - Accessibility standard if the open space is accessible to communities.
- 3.7 The Open Space Strategy builds upon previous audit and open space work undertaken, and the update of it includes that there have been over 40 upgrading projects since 2011 that have been successfully implemented. Bringing change and improvement to the quality, accessibility and function of important local parks, woodlands and open spaces.
- 3.8 The significant work across the County in East Lothian's path network is also a key contributor to improving access to open spaces. The development of the John Muir Way as a national walking route has brought further exposure and footfall to the County and the Council remains committed to working with Central Scotland Green Network [CSGN] and wider agencies to fulfil the intended aim of extending the Southern Upland Way to Dunbar so that Dunbar can be a hub and connecting point of two national walking routes.
- 3.9 The application of the open space standards through a mapping exercise when analysed identified that the Council area overall enjoys a good supply of high quality parks and open spaces.
- 3.10 Open spaces in East Lothian play a critical role in the life of a community, providing a range of facilities and places for quiet reflection, physical activity, sport and fun. The multi use nature of our open spaces can meet many of the local community needs close to where people live, and bring economic benefits to the area through tourism, Open spaces can be used for sport, children's play, relaxation, education and can provide a place for local events. East Lothian's parks, sports pitches and open spaces form a central part of the area's character, ranging from expanses of coastline to school grounds, from village greens to harbours and promenades.

4 POLICY IMPLICATIONS

4.1 The Open Space Strategy provides the evidence base for Open Space policies in the Local Development Plan and for the assessment of planning

applications and will contribute to the Council Plan, East Lothian Plan and National Performance Framework.

5 INTEGRATED IMPACT ASSESSMENT

5.1 The subject of this report has been through the Integrated Impact Assessment process and no negative impacts have been identified.

6 RESOURCE IMPLICATIONS

- 6.1 Financial There are no immediate financial implications from the Strategy or this report. Prioritising any improvements and or projects locally will be done in partnership with local groups and Area Partnership structures and contained within existing budgets and or external funds. Housing growth and LDP requirements will be captured through appropriate S75 process.
- 6.2 Personnel None
- 6.3 Other None

7 BACKGROUND PAPERS

7.1 East Lothian Open Space Strategy 2018 Appendix 1 – 5

Appendix 1 – Cluster Assessment

Appendix 2 – Sports Pitch Summary Table

Appendix 3 – Open Space Typology

Appendix 4 – 2016 Audited Sites

Appendix 5 - Consented Housing Developments

- 7.2 East Lothian Open Space Strategy 2018 Technical Report
- 7.3 East Lothian Open Space Strategy 2018 Mapped Assessment Report

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DATE	9 October 2018



East Lothian Open Space Strategy 2018



Executive Summary

May 2018

1.0 Open Space Strategy

1.1 The Value of Parks and Open Space

Open spaces play a critical role in the life of a community, providing a range of facilities and places for quiet reflection, physical activity, sport and fun. The multi-use nature of our open spaces can meet many of the local community needs close to where people live, and bring economic benefits to the area through tourism. Open spaces can be used for sport, children's play, relaxation, education and can provide a place for local events. East Lothian's parks, sports pitches and open spaces form a central part of the area's character, ranging from expanses of coastline to school grounds, from village greens to harbours and promenades.

Good quality open space contributes to the delivery of the Council Plan particularly in terms of "growing our people" and "growing our communities" by providing an attractive and safe resource for people to congregate, lead healthy active lives, learn and develop.



1.2 Purpose of the Strategy 2018

The East Lothian Open Space Strategy sets out the policy framework and vision for the protection, management and enhancement of existing as well as for the procurement of new open space and outdoor sports provision in East Lothian towns and villages. The Strategy will help inform decisions regarding the provision, development and management of open space over the period of 2018 – 2022, and fulfils the requirements of Scottish Planning Policy.

The study represents an important opportunity to identify the potential for Open Space in East Lothian and demonstrates how it can both deliver for East Lothian and support for both the strategic goals of the Central Scotland Green Network, whilst complementing and supporting Strategic and Area Based Regeneration and the delivery of the Local Plan. It will be reviewed every 5

years, to reflect changing needs, demands for specific facilities and the Local Development Plan context.

The key elements of Open Space Strategy development are:

- Strategic vision for open space
- Quantitative audit of the open space resource
- Qualitative assessment of the open space resource
- Strategy development based on audit intelligence and vision
- Development of locally open space standards
- Frameworks for implementation, monitoring and evaluation

1.3 Progress made since 2009

The Open Space Audit identified priority action projects from across the East Lothian area, based on a combination of the site assessment scoring process and a broader understanding of the 'bigger' picture. Since 2011, over 40 upgrading projects have been successfully implemented, bringing change and improvement to the quality, accessibility and function of important local parks, woodlands and open spaces.

The following parks and open spaces have had significant investment, including a range of new built / planted infrastructure (for example, children's play areas, park upgrades, drainage improvements and planting):

- Ashfield, Dunbar
- Seafield Crescent, Dunbar
- Winterfield Park, Dunbar
- John Mcintosh Gardens,
 East Linton
- Memorial Park, East Linton
- Innerwick Village Hall and Park
- Davidson Terrace, Haddington
- Whittinghame Drive, Haddington
- Memorial Park, Haddington
- Gifford Park
- Walden Place, Gifford
- Recreation Ground, Athelstaneford
- Goose Green, Musselburgh

- Old Craighall Park, Musselburgh
- Lewisvale Park, Musselburgh
- Lochbridge Road, North Berwick
- Gullane Recreation Park
- Cuthill Park, Prestonpans
- Rigley Terrace, Prestonpans
- Whin Park, Cockenzie
- Goolwa Park, Cockenzie
- Polson Park, Tranent
- Muirpark Road, Tranent
- Ormiston Park
- Moffat Road, Ormiston

These enhancements and major upgrades have resulted in an overall improvement in the quality of these open space sites and changes in the site classifications, in some cases. In some areas, the completion of new housing developments has provided new publicly accessible open space that has been added to the open space maps.







2.0 Vision for Open Space

2.1 Opportunities and Challenges

East Lothian is a wonderful county for enjoying the natural environment, both within its towns and villages and in the wider countryside and coastline.

Attractive parks, open spaces and play facilities are a key component of East Lothian's Green Networks, providing places to play, enjoy sport and informal recreation. The local path network provides a variety of opportunities to explore the scenic coastline, attractive villages set in rolling countryside and the foothills of the Lammermuir hills.

The natural environment and the attractiveness of towns and villages are major factors in the quality of life appreciated by residents and visitors, underpinning the health and well-being of communities and supporting the local economy. Having a high - quality environment is a key priority for the East Lothian Partnership, which should be balanced with the need to increase the business base. (East Lothian Plan 2017-27).

Over the coming decades, the county is facing great change in its population and economy. Projections anticipate that by 2035 East Lothian's population is set to increase by 33%, the highest percentage rate of growth in Scotland. East Lothian Partnership should plan for the impact this growth in population will have on communities and the services they need, including the provision of high quality connected parks and open spaces.

The Open Space Strategy will provide the Council with a "tool" to improve its management structures and practices, ensuring that the Council has a clear strategic direction to its open space investment and asset management. The Strategy standards are being set at a time when public, private and voluntary sectors have limited financial resources. Therefore, it is anticipated that the aims of the strategy may not all be met in the first five year period, but in the medium to long term as resources become available.

2.2 The Future of the Open Space in East Lothian

- The creation of successful, well-designed sustainable places is a National Performance Framework outcome, and is key to delivering the Partnership's vision to ensure that, "East Lothian people can live affordably and contribute to a thriving community life in a high – quality environment and that
 - **People in East Lothian are enjoying healthier lives** "This vision underpins the Open Space Strategy.

Our long term vision is that:

"East Lothian has a network of well designed, multi-functional, connected and accessible open spaces with a rich diversity of wildlife and habitats that are an invaluable asset for communities and visitors. Our open spaces play a critical role in the life of a community, encouraging healthy living by providing opportunities for sport, children's play, relaxation, educat ion and local events, close to where people live. These important natural spaces contribute significantly to East Lothian's quality of place, supports biodiversity, flood and coastal management, whilst supporting the local economy. The contribution to the wider green network will provide high quality active travel and path routes to and between open spaces and the countryside around towns.

Realising this vision requires a framework of policy, funding and management approaches to continue to provide exciting, diverse, high quality open spaces, which meet the needs of local communities and the wildlife it supports. The Strategy emphasises the need to make more of existing resources, as opposed to adding to overall levels of supply and to ensure that the full potential of open spaces is realised, moving towards a more integrated and inclusive approach to their management".

3.0 Objectives of the Strategy

3.1 Aspirations for Open Space

The East Lothian Partnership is committed to providing a high quality environment, improving the wellbeing and quality of life of our communities and promoting a sustainable lifestyle, and will work with, encourage and support communities to become actively engaged with their local environment.

The Open Space Strategy will help deliver the targets / outcomes set out in the East Lothian Plan, Council Plan and National Performance Framework, including the following:

Council Plan Growing our Communities

- to give people a real say in the decisions that matter most and provide communities with the housing, transport links, community facilities and environment that will allow them to flourish.

East Lothian Plan

- East Lothian people can live affordably and contribute to a thriving community life in a high quality environment.
- People in East Lothian are enjoying healthier lives.

National Performance Framework outcomes

- We live longer healthier lives
- We live in well designed, sustainable places where we are able to access the amenities and services we need.
- We value and enjoy our built and natural environment and protect it and enhance it for future generations.

A key component of the Strategy is to positively address the challenges posed by environmental sustainability through recommendations and actions addressing the long term sustainable management of open space.

3.2 Strategic Objectives

The Strategy has identified 8 strategic objectives, which reflect the key policy areas to be addressed over the lifetime of the Strategy in relation to the provision and management of open space:

• Healthier communities: strengthening the accessibility to multi-functional

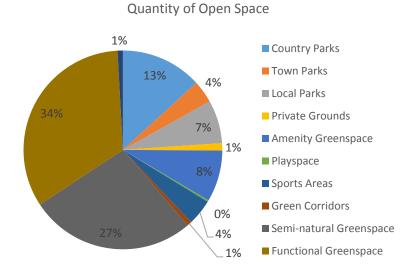
- open space and sports facilities to promote health and wellbeing and encourage more physical activity and promote Active Travel
- Green networks: enhancing the green network capacity and connectivity, offering a high quality natural environment for people, wildlife and biodiversity, with access to the countryside via the core path network
- Sustainable growth and regeneration: improving the profile, image and quality of place to improve its competitiveness as a location to visit, live and invest through the creation of high quality environments that attract economic development
- Quality open spaces: providing a high quality network of welcoming, diverse, attractive, accessible and connected open spaces, providing opportunities for sport, children's play, physical activity, relaxation, education and local events close to where people live
- Natural heritage: protecting and enhancing places where biodiversity, diverse habitats and wildlife can flourish, through sensitive management of public access
- Climate change: creating an environment that is more in balance, helping to moderate climate change and enabling flood and coastal management
- Community Development: encouraging involvement in the design and management of open space through greater engagement and interaction with local communities
- Management: managing East Lothian's open spaces and sports facilities in a cost-effective manner, involving the prioritised allocation of resources and community involvement

4.0 Open Space Standards

4.1 Open Space Audit

The Open Space Audit 2009 included the audit of 303 open spaces (parks, amenity greenspace, playspace, green corridors, semi-natural greenspace, allotments and golf courses) and sports pitches (hockey, rugby, shinty, football, cricket, bowls, athletics, tennis) included in the Open Space Audit and the Sports Pitch Strategy. A further 44 open spaces were audited in 2016.

The total amount of open space included in the Open Space Audit (2009 + 2016) is **1,453.11 hectares**, which is divided between the following types of open space:



The majority of these sites are managed by East Lothian Council and are distributed throughout the major settlements as set out below:

Settlement	No. of Sites	Amount of Open Space (ha)		
Aberlady	10	85.58		
Athelstaneford	3	1.51		
Cockenzie & Port	17	14.41		
Seton				
Dirleton	11	20.38		
Drem	1	0.15		
Dunbar	29	226.47		
East Linton	12	19.30		
East Saltoun	3	6.08		
Elphinstone	4	1.81		
Garvald	2	0.84		
Gifford	6	101.23		
Gullane	8	134.19		
Haddington	40	112.77		
Humbie	3	5.91		
Innerwick	1	0.46		
Longniddry	13	53.12		
Macmerry	9	6.75		
Musselburgh East	18	125.71		
Musselburgh West	27	158.16		
New Winton	3	8.87		
North Berwick	29	191.70		
Oldhamstocks	1	0.30		
Ormiston	5	5.78		

Pencaitland	11	37.14
Prestonpans	33	81.80
Stenton	2	0.67
Tranent	35	30.11
Wallyford	9	13.16
Whitecraig	2	3.69

Open Space Standards

Whilst bespoke to the needs of East Lothian and its policy framework, a set of open space standards have been developed, carefully benchmarked with national and Scottish local authority standards. The East Lothian Open Space Standard set standards for quantity, quality and accessibility across a range of PAN 65 typologies that will ensure a clarity of application that can be monitored and evaluated over the life of the Open Space Strategy and LDP. It is intended to be a progressive standard, with improvements to open spaces undertaken over time and standards reviewed on a regular basis.

The **quantity** standard seeks to assess if there is enough open space if it is equitably distributed. All settlements should seek to secure:

• 60m² of Open Space and Play Provision per household (including public parks, amenity greenspace, playspace)

The **quality** standard seeks to assess if the open space is 'fit for purpose'. All communities have access to high quality open space:

• All outdoor open space will score "Fair", "good" or "excellent" quality (band A, B or C). Any sites in band D or E are not fit for purpose.

Band A	Band B	Band C	Band D	Band E
Score of	Score of	Score	Score of	Score of
75% or	65 -	of	45 – 54%	less than
more	74%	55 -		45%
		64%		
Excellent	Good	Fair	Poor	Failing

Fit for purpose Not fit for purpose

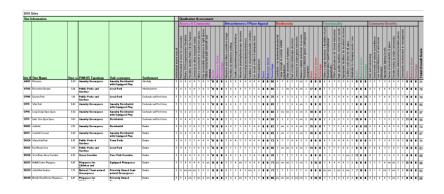
The **accessibility** standard seeks to assess if the open space is accessible to communities. All settlements should have access to the following:

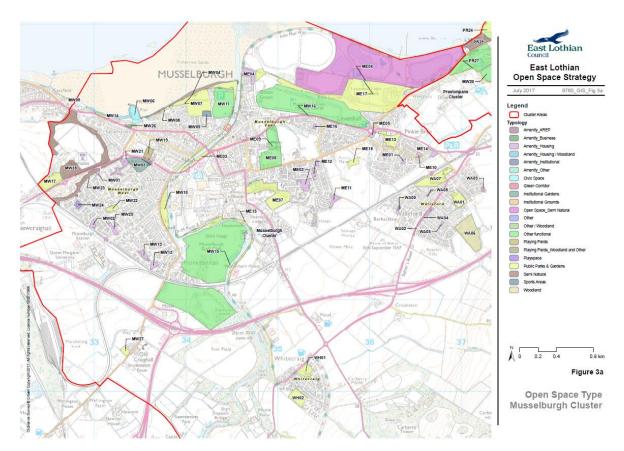
- Country Park within 10km
- Town Park within 1.2km
- Local Park within 400m
- Regional Athletics facility within 36km
- Full Size Sports Pitch within 1.2km
- Green networks (semi-natural greenspaces/ countryside) within 300m

 Either a Neighbourhood Equipped Area for Play (NEAP) or a Local Equipped Area for Play (LEAP) within 600m and 400m respectively

4.3 Open Space Assessment

A number of the open spaces audited in 2009 were revisited and the quality scores revised, to reflect facilities upgrades since the last audit. A GIS database was prepared, which forms the basis of the Open Space Strategy analysis along with other open space databases.





Application of Open Space Standards

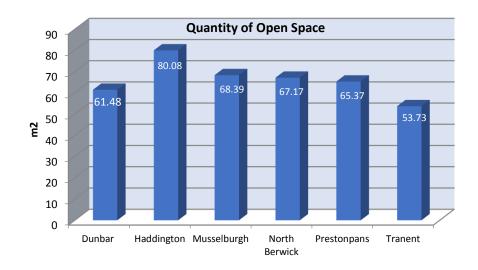
Once the mapping exercise was completed, the application of the quantity, quality and

accessibility standards enabled the analysis stages of the Strategy to be progressed. As expected, there are variations in supply of different types of open space in different parts of East Lothian.

The full Strategy report and mapping provides the detailed analysis of open space and sports provision and a summary for each of the 6 Clusters:

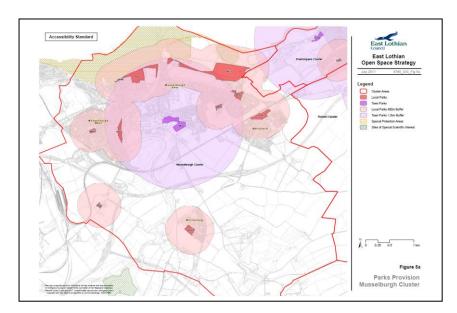
- Dunbar Cluster
- Haddington Cluster
- Musselburgh Cluster
- North Berwick
 - Cluster
- Prestonpans Cluster
- Tranent Cluster

The application of the East Lothian **quantity** standard for Public Parks concludes that the Haddington, Musselburgh, North Berwick and Prestonpans Clusters meet the standard. However, the Tranent cluster falls short with 53.73m² of open space per household. All other clusters meet the standard for quantity of open space (60m² of Open Space and Play Provision per household).



In terms of **quality** of Public Parks and Gardens the Dunbar, Haddington, North Berwick, Musselburgh and Prestonpans Clusters meet the East Lothian Standard, with the majority of parks scoring over 65%. The settlements of Aberlady, Prestonpans, Elphinstone, Ormiston and Tranent each have one site that does not meet the quality standard. Three of these sites are located within the Tranent cluster. However, as these parks are located in 3 different settlements we have concluded that each settlement reasonably meets the quality standard.

In terms of **accessibility** of Town Parks, East Lothian is well provided for in the larger settlements, with all residents living within 1.2km of a park. The combination of Town and Local Parks ensure that most residential areas in East Lothian's towns and villages settlements live within the catchment of a park. The residential areas outwith these catchments include: the western extremities of Haddington, east and western extremities of Gullane, west of North Berwick and the southern fringes of Dunbar.



As expected, there are variations in supply of different types of open space in different parts of East Lothian. Overall, the Council area enjoys a good supply of high quality parks and open spaces. Alongside the supply of parks and open spaces, different levels of demand have been identified in terms of use of sports facilities and allotments. Current and future planned supply of sports facilities and allotments facilities is good and is expected to meet demand.

The table below summarises the assessment, with regard to the quantity, quality and accessibility of open space for each cluster:

Does the Cluster meet the standard?							
Cluster	Green Network	Parks and Gardens		Amenity Greenspace	Play- space	Sports Areas	
	Accessibility	Quantity	Quality	Accessibility	Quality	Accessibility	Accessibility
Dunbar	Yes	Yes	Yes	Yes	Yes	No	Yes
Haddington	Yes	Yes	Yes	No	Yes	Yes	Yes
Musselburgh	Yes	Yes	Yes	Yes	No	Yes	Yes
North	Yes	Yes	Yes	No	Yes	No	No
Berwick							
Prestonpans	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Tranent	Yes	No	Yes	Yes	Yes	Yes	Yes

The application of these standards to East Lothian settlements has concluded that some clusters, namely the Musselburgh and Prestonpans Clusters, have a good supply of high quality parks, within easy reach of residents living within its settlements therefore meeting all three standards. Other clusters, for example, North Berwick and

Tranent, meet two out of the three standards. The Tranent cluster falls short of the quantity standard (60m² of open space per household) by a relatively small margin (53.73m²). However, the town meets the quality and the accessibility standard. Quantity of open space provided in new developments should be a priority, along with ensuring they are in the right place and accessible. Future resources and new developments should concentrate on providing new parks in the Tranent cluster to ensure that there is sufficient open space for new populations.

Overall, the Council area enjoys a good supply of high quality parks and open spaces. Alongside the supply of parks and open spaces, different levels of demand have been identified in terms of use of sports facilities and allotments. Current and future planned supply of sports facilities and allotment facilities is good and is expected to meet demand.

5.0 Delivering the Vision

5.1 Next Steps

The Open Space Strategy is intended to provide the Council's Open Space managers with a "tool" to improve the management structures and practices, ensuring that the Council has a clear strategic direction to its open space investment and asset management. The Strategy aligns with the Council Plan and has the ability to make a positive contribution to Growing our Communities. Working with and alongside our communities, particularly through the Area Partnership model to prioritise open space improvements in cluster areas, will be a key delivery mechanism for the Open Space Strategy.

The Council is committed through the Council Plan to working alongside and building capacity and resilience across our Communities and the involvement in and use of our open spaces can play an important role in that. Recent works and improvements in delivery of open space projects in partnership with Area Partnerships provide confidence in this empowering approach for communities.

As Area Partnerships will be a key partnership vehicle for prioritising and delivery, it will not be exclusive. There are a range of Friends Groups that will enhance the delivery of the principles contained within the Open Space Strategy. These groups too will play a valuable role in future improvements to enhance the quality of environment for all across East Lothian.

5.2 Implementation of the Action Plan

Part of the Strategy has included an Action Plan, identifying actions for the delivery of the Strategy. Action are summarised as follows:

- Establish multi-agency working, joint partnership initiatives and action
- Achieve effective community consultation
- Enhance green network capacity / connectivity
- Secure sustainable growth and regeneration
- Provide a high quality network of open spaces
- Promote healthier communities through community events & education programme
- Undertake programme of sports pitch upgrades

- Protect and enhance natural heritage
- Address climate change through biomass schemes and flood prevention measures
- Ensure effective management of open space

5.3 Monitoring and Evaluation

Best practice recommends that a Monitoring and Evaluation Framework should be set up to establish a formal and measurable process to record outputs and outcomes. It is vital that the Open Space Strategy becomes a part of the dayto-day management of the Council's open space resource.

The monitoring process should address the following issues:

- Open Space Audit
- Future stakeholder and community engagement
- Capital and funding programme
- Open space quality improvements
- User satisfaction

Changes to the open space resource and updating of the Open Space Audit database will be monitored and recorded through the Change Log, adding new sites / recording improvements. A log of new and consented open space sites will be maintained (with accompanying mapping), that will inform the Open Space Strategy reviews.

An annual action plan and a summary progress statement will be prepared on an annual basis by the Open Space Steering Group to achieve the following:

- Annual Action Plan identifying the tasks required for implementation of the Strategy, in conjunction with Service Plans
- Summary Progress Statement to summarise progress made on the Action Plan and undertake an evaluation of success
- A "Best Practice" open space project will be identified for each cluster area on an annual basis, to encourage greater involvement / interest in local greenspaces and recognise the achievements of local groups (e.g. Amisfield Preservation Trust)
- This publicity will encourage further initiatives and will help to consolidate and expand success.

5.4 Copies of the Open Space Strategy

The full version of the Open Space Strategy is available to view at East Lothian Council, John Muir House, Haddington, East Lothian EH41 3HA for inspection by the public at all reasonable times, as well as on the Council website: https://www.eastlothian.gov.uk/meetings/meeting/16359/members_library_service (ref no.166/18)

The full version of the Open Space Strategy comprises the following parts:

Main Strategy Report

Detailed Settlement Mapping

Appendix 1 Cluster Assessment

Appendix 2 Sports Pitch Summary Tables

Appendix 3 East Lothian Open Space Typology

Appendix 4 2016 Audited Sites

Appendix 5 Consented Housing Developments



