

**REPORT TO:** Planning Committee  
**MEETING DATE:** 1 April 2025  
**BY:** Executive Director – Place  
**SUBJECT:** Application for Planning Permission for Consideration

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Application No. **23/00786/AMM**

Proposal Approval of matters specified in Conditions 1 and 10 of planning permission in principle 18/01123/PPM – Erection of 22 holiday lodges and associated works (part retrospective)

Location **Whitekirk Hill  
Whitekirk  
North Berwick  
East Lothian  
EH39 5PR**

Applicant Whitekirk Hill Ltd

Per APT Planning & Development

**RECOMMENDATION** Consent Granted

## **REPORT OF HANDLING**

### **DESCRIPTION OF APPLICATION SITE**

The application site comprises of an irregular shaped area of land measuring some 2.4 hectares in area, at 'Whitekirk Hill', a tourism and leisure facility, which is located some 0.5 of a mile to the north of the village of Whitekirk. The 'Whitekirk Hill' tourism and leisure facility was formerly the Whitekirk Golf and Country Club, comprising clubhouse and golf course. The application site comprises two main components that are linked by a narrow strip of land and a further narrow strip of land extends northwards from the eastern main component linking the whole site to an existing access road of the larger area of land of the 'Whitekirk Hill' development.

The application site is located on Whitekirk Hill, which forms a high point within the wider landscape. The site is bounded to all sides by further land of Whitekirk Hill. Immediately to the west of the westernmost main component of the site is an area of woodland known as Whitekirk Covert. The classified A198 public road is located some 350 metres to the east/southeast of the application site.

The eastern main component of the site is positioned some 160 metres to the southwest of the 'Whitekirk Hill' facility building, which is now operating, with the benefit of planning permission 18/00312/P, as a mixed-use, multi-function leisure club facility, and which incorporates a restaurant, bar and café facilities, gym and swimming pool facilities, and indoor/outdoor children's play areas.

Whitekirk Hill is located in the countryside, to the north and northeast of the village of Whitekirk. The village of Whitekirk is located some 650-700 metres to the south of the application site. The application site is outwith the Whitekirk Conservation Area, the northern edge of which (at its closest) is some 70 metres away to the southeast of the application site. The Scheduled Ancient Monument of Whitekirk Hill Cairn is located some 300 metres to the south of the application site at the northwest edge of the Whitekirk Conservation Area. A further Scheduled Ancient Monument, Pilgrims House at Tithe Barn, is located some 600 metres away to the south of the application site. There are no listed buildings within the application site. There are however a number of listed buildings within the village of Whitekirk, including the Category A listed Tithe Barn (or Granary) and the Category A listed Whitekirk Parish Church. There are further listed buildings in the wider area including the Category B listed Newmains Farmhouse some 600 metres away to the northeast.

The application site is within the Whitekirk and Balgone Outcrops Special Landscape Area (SLA) defined in the adopted East Lothian Local Development Plan 2018 (ELLDP). There is an area of trees (Whitekirk Covert), immediately to the west of the western main component of the application site. There are further sporadically positioned trees outwith the site along the boundaries of the larger area of land comprising the land of Whitekirk Hill.

The Tynninghame Inventory Garden and Designed Landscape is located outwith the application site some 900 metres away to the southeast, Balgone House Inventory Garden and Designed Landscape is located outwith the application site some 1.5 mile away to the northwest, and Leuchie Inventory Garden and Designed Landscape is located outwith the application site some 1.0 mile to the northwest. Newbyth House, Seacliff and Leuchie Local Gardens and Designed Landscapes are located outwith the application site respectively some 1.0 mile away to the southwest, some 0.5 of a mile away to the northeast, and some 1.2 miles away to the northwest.

Parts of the site are identified as being susceptible to surface water flooding.

A core footpath and right of way passes to the west/southwest of the larger area of land of the Whitekirk Hill development, some 0.4 of a mile away to the west/southwest of the application site.

## **RELEVANT PLANNING HISTORY**

At their meeting on 4th March 2020, the Planning Committee resolved to grant planning permission in principle (Ref. 18/01123/PPM) for a holiday lodge development, with associated access, landscaping and infrastructure works on land of the former Whitekirk Golf and Country Club subject to the prior conclusion of a Section 75 Legal Agreement designed to secure that: (i) the proposed holiday lodges on the site would remain in the ownership of one operator and be operated as one facility under a central management process; and (ii) the proposed holiday lodges would be tied in ownership with the existing leisure club facilities at 'Whitekirk Hill'. The Section 75 Agreement was satisfactorily concluded and thus, planning permission in principle 18/01123/PPM was granted on 13th July 2020 for a maximum of 41 holiday lodges and associated development on the

northeast part of the site.

Condition 1 of planning permission in principle 18/01123/PPM sets out design criteria for the proposed holiday lodge development, including that there be a maximum of 41 holiday lodges, and that these lodges should be positioned on the northeast part of the site generally in accordance with the positions shown on the indicative masterplan drawing docketed to the grant of planning permission in principle. Condition 1 also sets out design criteria on the heights, footprints and positions of the proposed holiday lodges, and the width of the access road.

The indicative masterplan details approved with planning permission in principle 18/01123/PPM split the development of the site for 41 holiday lodges into 4 Phases of development (Phases 1.1, 1.2, 1.3 and 1.4).

The site that is the subject of this current application (Ref. 23/00786/AMM) forms part of the northeastern part of the site of planning permission in principle 18/01123/PPM and comprises part of Phase 1.2 and the whole of Phase 1.3 of the holiday lodge development approved in principle by planning permission in principle 18/01123/PPM.

Planning permission in principle 18/01123/PPM is the subject of an Environmental Impact Assessment (EIA).

On 2nd November 2020 planning permission 20/00747/AMC was granted for the approval of matters specified in conditions of planning permission in principle 18/01123/PPM for the erection 9 holiday lodges and associated works comprising Phase 1.1 of the holiday lodge development already approved in principle by planning permission in principle 18/01123/PPM.

A further grant of planning permission (Ref. 23/00421/P) for alterations and extension of the leisure club facilities at 'Whitekirk Hill' was granted in July 2023.

On 2nd August 2024, planning permission (Ref. 23/01420/P) was granted for the change of use of two areas of land of the east/southeast part of the larger site at Whitekirk Hill to use as an assault course and associated works, including the installation of assault course structures and four buildings. Planning permission 23/01420/P was granted for a temporary period of five years only.

## PROPOSALS

This current application (Ref. 23/00786/AMM) seeks the approval of matters specified in conditions 1 and 10 of planning permission in principle 18/01123/PPM for the erection of 22 holiday lodges and associated works. These lodges being units comprising part of Phase 1.2 and the whole of Phase 1.3 of the holiday lodge development approved in principle by planning permission in principle 18/01123/PPM, and this phase now being referred to as Phase 2.

The associated works comprise the formation of lengths of access road, turning areas, parking and footpaths, and drainage/SuDS facilities, all as Phase 1.3 and part of Phase 1.2 of the larger holiday lodge development to which planning permission in principle 18/01123/PPM and the masterplan docketed to that permission apply.

Planning permission is sought part retrospectively because a number of the holiday lodges and their associated access roads and parking areas have already been formed and installed on the site.

The 22 (twenty-two) holiday lodges comprise two different lodge types: 12no (twelve) 3-bed large lodges containing 3 double bedrooms each, and 10no (ten) small (micro) lodges containing one double bedroom each.

All of the 22 (twenty-two) holiday lodges the subject of this application are and would be single storey in height with a roof ridge height above ground level of some 3.9 - 4.0 metres. All of the 22 (twenty two) holiday lodges have a rectangular footprint. The footprint of each of the large 3-bed lodges measures some 100 square metres in area and the footprint of each of the small (micro) lodges measures some 28 square metres in area.

The roofs of the twelve large holiday lodges are and would be finished with profile metal sheeting (in a dark grey colour) and their walls are and would be clad with vertical timber cladding (coloured "anthracite grey" and "light grey"). The roofs and the majority of the walls of the ten small holiday lodges are and would be finished with corrugated sheet steel cladding (coloured RAL 7016 "anthracite grey"). One wall of the ten small holiday lodges is and would be finished with horizontal larch timber cladding. The frames of the windows and external doors (including sliding doors) of the large lodges is and would be of alu-clad construction (coloured "anthracite grey"), and the frames of the windows and external doors (including sliding doors) of the small lodges is and would be of aluminium construction (coloured RAL 7016 "anthracite grey"). The architectural form of the 10 small lodges is and would be a modern interpretation of a traditional form with an enclosed terrace on the elevation of it that faces north towards the wider landscape views and with minimal glazing on the majority of its elevations. The exception to this being the elevation facing towards the wider landscape views over the enclosed terrace area, which would include a pair of glazed doors. The 12 large lodges are and would be of a more contemporary architectural appearance with glazing to all sides, including a large area of glazing on one long side that is and would be supplemented by an external timber stepped deck area.

The 22 (twenty-two) holiday lodges are and would be loosely arranged in three groups on the application site: an eastern group comprising 6 (six) larger lodges; a western group comprising 6 (six) larger lodges; and to the north of that the group of 10 (ten) small lodges. The 12 larger lodges would be positioned to each side of the access road and each would have their own allocated parking area. The group of 10 small lodges would be positioned set back from the access road and would be accessed by footpaths from a shared parking area. The new length of access road would extend southwest from the existing access road that serves Phase 1.1 of the holiday lodge development at 'Whitekirk Hill'. The eastern group of 6 large lodges would be positioned with 3 lodges to each side of the access road, the group of 10 small lodges would be positioned on the north side of the access road, and the western group of 6 large lodges would be positioned respectively with 4 lodges on the west side and 2 lodges on the east side of the access road and a turning area would be formed at the southwest end of the access road. The narrow elongated areas of the site attached to the north of the east main component of the site and located between the two main components of the site would comprise lengths of access road.

Vehicular access to the site would be taken from the A198, which is located some 350 metres to the east/southeast of the site, via the existing vehicular access and access road that serves the mixed-use, multi-function leisure club facility, known as 'Whitekirk Hill' and Phase 1.1 of the holiday lodge accommodation at Whitekirk Hill. A new length of access road would be formed extending from the south side of that existing private access road in a southwesterly direction, to the southwest of the leisure club facility building of 'Whitekirk Hill' and rising landform, following a fairway of the former golf course before rising again to the higher level of the western main component of the current application site and then continuing in a westerly direction towards the woodland area of Whitekirk

Covert. A circular turning area would be formed at the western end of the new access road. The proposed access road would be some 3.7 metres in width and would be surfaced with a gravel chip finish. The 12 large lodges would be provided with allocated parking for at least two cars. These parking areas would be finished with reinforced grass. The 10 small lodges would be provided with a shared parking area measuring some 50 metres by 6 metres from which reinforced grass footpaths and gravel surfaced footpaths would lead to the lodges. The shared parking area would be surfaced with reinforced grass. All of the parking areas would be located immediately alongside the proposed access road and new footpaths would lead from them to the respective proposed lodges.

The proposed foul drainage comprises a wastewater treatment plant, lined reed bed and lined willow bed located to the west of the northernmost length of access road the subject of this application (i.e. the northernmost elongated area of the application site) and to the south of the existing access road serving Phase 1.1, and also an unlined willow bed to the north side of the existing access road serving Phase 1.1 where the new length of access road joins the southern side of that existing length of access road. The proposed foul drainage is outwith the application site red boundary but is located on land identified as being in the ownership/control of the applicant.

The following reports have been submitted in support of the application:

- i) Landscape and Visual Impact Assessment Addendum;
- ii) Archaeological Evaluation Data Structure Report (prepared by AOC Archaeology Group, Project no. 25497-23, dated November 2023);
- iii) Planting Notes & Landscape Maintenance Management Proposals, dated December 2023, prepared by Brindley Associates;
- iv) Preliminary Ecological Appraisal report, dated December 2023, prepared by Brindley Associates;
- v) Biodiversity Enhancement Plan - revision A, dated January 2024, prepared by Brindley Associates;
- vi) Preliminary Environmental Assessment Report, dated 22nd December 2023, Project no. P14514/V04, Document Ref. P14514-GOO-XX-XX-RP-C-0001-Rev02, prepared by Goodson Associates;
- vii) Whitekirk Hill Phase 2 Development - Wastewater Drainage Design, dated 26th January 2024, Project no. GON.0223.0131, prepared by Gondolin Land and Water;
- viii) Treated Sewage Effluent Discharge Permit - Whitekirk Hill Phase 2, CAR/S/5006923;
- ix) Tree Survey Report and Arboricultural Impact Assessment report, dated January 2025, prepared by Brindley Associates;
- x) Energy Statement;
- xi) Whitekirk Hill Supplier List;
- xii) a letter from the applicant's agent; and
- xiii) Photomontage Package, dated March 2024.

In the supporting letter submitted by the applicant's agent, the planning history for the approval in principle of a development of 41 holiday accommodation lodges is set out. It is stated that the 22 lodges proposed through the application generally accord with the masterplan layout docketed to the grant of planning permission in principle 18/01123/PPM in terms of their positioning, footprint size and heights. In respect of the heights of the lodges, the supporting letter explains that in some cases the heights are lower than those indicatively shown through planning permission in principle 18/01123/PPM. It is explained that the changes to the size and design of the proposed lodges is in response to the experience and customer demands of the first three years of trading of Phase 1.1 of the holiday lodge development at Whitekirk Hill.

The supporting letter goes on to explain that excavation and infill of ground levels has been kept to a minimum, and that the lodges have been designed to keep light spill to a minimum.

The supporting letter also seeks to explain how the development the subject of this application meets the policies of National Planning Framework 4 (NPF4), which has been adopted by Scottish Government since the grant of planning permission in principle 18/01123/PPM.

Subsequent to the registration of this application, it became apparent that the development had already commenced on the site and that a number of the holiday lodges and their associated access roads and parking areas have already been formed and installed on the site. Thus, the application is made in part retrospectively. Therefore, in accordance with East Lothian Council Planning Service's discretionary charging procedures, a surcharge of 25% should be applied to the application and the application cannot be registered until such fee is paid. In accordance with this procedure the application was invalidated until such time as the required fee surcharge had been paid and was then subsequently re-registered.

Subsequent to the registration of this application, amended plans have been submitted to:

(i)reposition the 3 most westerly small (micro) lodges further to the south away from the existing areas of gorse, to reposition the eastern most small (micro) lodge further to the south, and to reposition the 3 most westerly large 3-bed lodges further to the east away from the existing trees of the Whitekirk Covert;

(ii)clarify the use of air source heat pumps;

(iii)clarify refuse collection procedures;

(iv)clarify that the operation of the holiday lodges would comply with the terms of the S75 Agreement of planning permission in principle 18/01123/PPM;

(v)clarify any economic benefits associated with the 22 holiday lodges;

(vi)correct errors on the application drawings and in the supporting reports;

(vii)provide drawings comparing the indicative scheme approved by the grant of planning permission in principle 18/01123/PPM and the now proposed development;

(viii)provide section drawings of the proposed development and correct errors on those section drawings;

(ix)provide drawings showing areas of cut and fill on the site;

- (x) clarify changes to the surface finishes of the parking areas and road;
- (xi) query the design of the proposed large lodges;
- (xii) clarify the external finishes of the proposed lodges;
- (xiii) provide amended visualisations;
- (xiv) provide a Biodiversity Enhancement Plan and a statement on carbon emissions reduction;
- (xv) provide details for tree protection and landscaping of the site; and
- (xvi) correct errors on the application drawings.

This additional information is shown on amended and additional application drawings.

## **ENVIRONMENTAL IMPACT ASSESSMENT**

Planning permission in principle 18/01123/PPM for the principle of the holiday lodge development on the wider site at Whitekirk Hill was development for which Environmental Impact Assessment (EIA) was required. This current application is for matters specified in conditions of planning permission in principle 18/01123/PPM and as such is part of the development already assessed through the Environmental Impact Assessment (EIA) associated with Planning permission in principle 18/01123/PPM. Accordingly, there is no requirement for further assessment through Environmental Impact Assessment.

## **DEVELOPMENT PLAN**

Section 25 of the Town and Country Planning (Scotland) Act 1997 requires that the application be determined in accordance with the development plan, unless material considerations indicate otherwise.

Since the grant of planning permission in principle 18/01123/PPM, Scottish Planning Policy (SPP) and the approved Edinburgh and South-East Scotland Strategic Development Plan (SESplan) have been superseded by National Planning Framework 4 (NPF4).

The development plan now is National Planning Framework 4 (NPF4) and the adopted East Lothian Local Development Plan 2018 (ELLDP).

National Planning Framework (NPF4) Policies 1 (Tackling the climate and nature crises), 2 (Climate mitigation and adaptation), 3 (Biodiversity), 4 (Natural places), 6 (Forestry, woodland and trees), 7 (Historic assets and places), 12 (Zero waste), 13 (Sustainable transport), 14 (Design, quality and place), 22 (Flood risk and water management) and 30 (Tourism) and Policies DC1 (Rural Diversification), DC9 (Special Landscape Area), CH1 (Listed Buildings), CH2 (Development affecting Conservation Areas), CH4 (Scheduled Monuments and Archaeological Sites), CH6 (Gardens and Designed Landscapes), DP1 (Landscape Character), DP2 (Design), T1 (Development Location and Accessibility), T2 (General Transport Impact), SEH2 (Low and Zero Carbon Generating Technologies), W3 (Waste Separation and Collection), NH5 (Biodiversity and Geodiversity Interests, including Nationally Protected Species), NH10 (Sustainable Urban Drainage), NH11 (Flood Risk) and DEL1 (Infrastructure and Facilities Provision) of the East Lothian Local Development Plan 2018 (ELLDP) are relevant to the determination of the application.

Also material to the determination of the application is ELLDP Supplementary Planning Guidance (SPG) on Special Landscape Areas.

Also material to the determination of the application are Sections 59 and 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997.

Section 59 (1) of the Planning (Listed Building and Conservation Areas) (Scotland) Act 1997 states that in considering whether to grant planning permission for development which affects a listed building or its setting, a planning authority or the Secretary of State, as the case may be, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 states that a planning authority must have regard to the desirability of preserving or enhancing the character or appearance of a conservation area in exercising its responsibilities in the determination of any application for planning permission for development affecting a conservation area or its setting. In terms of its design, materials, scale and siting, development should be appropriate to the setting of the conservation area.

Also relevant is the Historic Environment Scotland Policy Statement June 2016, which states that scheduled monuments are of national importance and that they should be preserved in situ and within an appropriate setting. Where works requiring planning permission would affect a scheduled monument, the protection of the monument and the integrity of its setting are material considerations in the determination of whether or not planning permission should be granted for the proposed development.

Planning Advice Note 2/2011: Planning and Archaeology similarly state that planning authorities should protect archaeological sites and monuments as an important finite and non-renewable resource and preserve them in situ wherever possible. Where in situ preservation is not possible, planning authorities should, through the use of conditions or a legal obligation, ensure that developers undertake appropriate excavation, recording, analysis, publication and archiving before and/or during development. Planning Advice Note 2/2011: Planning and Archaeology similarly advises.

Also material to the determination of the application is the planning history for the site.

No public representation to the application has been received.

## **COMMUNITY COUNCIL**

Dunpender Community Council has been consulted on the application, however, no response has been received from them.

## **PLANNING ASSESSMENT**

By the grant of planning permission in principle 18/01123/PPM the erection of 41 holiday accommodation lodges and associated works on a part of the northeast part of the land of Whitekirk Hill is established, and there can be no objection in principle to such form of development on the site.

The current application comprises part of that northeastern part of Whitekirk Hill to which the grant of planning permission 18/01123/PPM applies, and the proposed development is for 22 holiday lodges of the 41 holiday lodges approved by the grant of planning



permission 18/01123/PPM. The land of the current application site comprises land of Phase 1.3 and part of the land of Phase 1.2 to which the grant of planning permission in principle 18/01123/PPM applies.

Thus, through the grant of planning permission in principle 18/01123/PPM, the principle of the development of the current application site for holiday lodge development has been established. Therefore, in the determination of this application for approval of the details of the specific form of the holiday lodge development and its associated works now proposed there can be no objection in principle to the development of holiday lodges on the application site.

The principle considerations in the determination of this application for planning permission for matters reserved in conditions are whether, having regard to national, strategic and local planning policies, guidance and other material considerations, the siting, scale, form, design and external appearance of the proposed 22 holiday lodges and associated development, including the landscaping of them, and means of access to them (the matters specified in conditions) are acceptable with due regard to the potential impact of the development on the landscape character and amenity of the area, including the special character of the Whitekirk and Balgone Outcrops Special Landscape Area or to the setting of the Whitekirk Conservation Area, or to the setting of the nearby listed buildings and scheduled monuments, Inventory Gardens and Designed Landscape and Local Gardens and Designed Landscape, whether the proposed development would result in harmful impacts to the amenity of neighbouring properties or users of the nearby public rights of way, whether the proposed development would have a harmful impact on any trees that are on or adjacent to the site, whether the proposed development would have a detrimental impact on the environment, and whether or not the site is capable of accommodating the development, including a sufficient amount of on-site parking and turning, and a safe means of vehicular and pedestrian access.

The grant of planning permission 20/00747/AMC approved in 2020 comprised only nine holiday accommodation lodges of the 41 approved by the grant of planning permission in principle 18/01123/PM, leaving the detail of 32 holiday lodges yet to be approved. The current application proposes the development of 22 holiday accommodation lodges. The current application for the details of 22 holiday lodges is therefore within the total number of holiday lodges approved in principle by the grant of planning permission in principle 18/01123/PPM. Should planning permission be granted for the 22 holiday accommodation lodges the subject to this application, that would leave 10 holiday accommodation lodges of the total of 41 yet to be approved in detail.

The application site is located in the countryside at Whitekirk Hill to the northeast of the village of Whitekirk. It forms part of the Whitekirk and Balgone Outcrops Special Landscape Area (SLA). The southern highest part of Whitekirk Hill, around the location of the scheduled monument of Whitekirk Hill Cairn and the part of the Hill that is within the Whitekirk Conservation Area are outwith the application site. The application site is set within a largely agricultural landscape of arable fields. Whitekirk Hill with its rocky outcrops stands out as a distinctive visual feature of this landscape. The land of planning permission in principle 18/01123/PPM was formerly in use as and laid out as a golf course with the fairways and greens being located between the rocky outcrops and with gorse, woodland and open space in between the formal course areas.

By the grant of planning permission in principle 18/01123/PPM it was accepted that although the proposed 41 holiday lodge development would result in detrimental impacts on the special character of this part of the Whitekirk and Balgone Outcrops SLA, such harmful impacts would be localised and would have little overall impact on the character of the wider area and SLA, and that on balance whilst there would be an impact on the

character of this part of the SLA, in principle the proposed holiday lodge development would make a direct and positive contribution to the tourism sector in the county, which would be sufficient to outweigh the localised harm to this part of the SLA, and that it should be possible through planning controls to design a layout and form of development that would minimise detrimental impact on the landscape setting. Those design controls were imposed through conditions of the grant of planning permission in principle 18/01123/PPM. It is in this context that the proposed and retrospective 22 holiday lodges the subject of the current application (Ref. 23/00786/AMM) must be assessed.

Condition 1 of planning permission in principle 18/01123/PPM sets out design criteria for the proposed holiday lodge development, including that the lodges should be positioned on the northeast part of the site generally in accordance with the positions shown on the indicative masterplan drawing docketed to the grant of planning permission in principle, that, with specific exceptions on the northwest part of the site, the detailed form, footprint and height of the holiday lodges should be no greater than that shown on the indicative masterplan drawing and should be predominantly single storey in height, that the proposed holiday lodges should be generally positioned on the lower ground levels of the site so as to be below ridge lines, that excavation and build-up of ground levels and vegetation removal should be kept to a minimum at each lodge position, that the holiday lodges should be designed to minimise and reduce light spill from windows and consider the use of non-reflective or tinted glazing, that the access road should be no wider than 3.7 metres with provision for passing places and that roads, parking and turning areas and footpaths should be designed and finished to minimise visual intrusion.

The masterplan attached to the grant of planning permission in principle 18/01123/PPM shows that Phases 1.2 and 1.3 together comprise 26 lodges (13 holiday lodges each), and that the lodges are shown to be split into two cluster groups (a northern and a southern cluster) for each Phase. For Phase 1.2, the northern cluster comprises 7 lodges and the southern cluster comprises 6 lodges. For Phase 1.3, the northern cluster comprises 8 lodges and the southern cluster comprises 5 lodges.

The current application comprises roughly the location of the whole of Phase 1.3 and the northern cluster area of Phase 1.2. However, rather than 20 holiday lodges that are shown on the masterplan for those parts of the Whitekirk Hill site, the now proposed layout comprises 22 holiday lodges.

The grant of planning permission in principle 18/01123/PPM approves a total of 41 holiday lodges on the land of the northeastern part of Whitekirk Hill. Although through this current application (Ref. 23/00786/AMM) a different (greater) number of holiday lodges are proposed on this part of the northeastern part of the land of Whitekirk Hill than is approved in principle through the masterplan of planning permission in principle 18/01123/PPM, subject to the now proposed grouping of 22 holiday lodges being appropriate within their landscape setting, a detail that will be assessed through this report of handling, the number of holiday lodges proposed for the northeastern part of the land of Whitekirk Hill through this current application and already approved by the grant of planning permission 20/00747/AMC remains within the total number of 41 holiday lodges approved in principle by the grant of planning permission in principle 18/01123/PPM.

At the time of the writing of this report, of the twenty-two lodges proposed through this application, the six 3-bed lodges of the eastern area of the site have been erected, three 3-bed lodges have been erected on the western part of the site, and six of the ten small (micro) lodges have been erected on the northern part of the site. Thus, the application is in part retrospective.

The proposed and retrospective development of 22 lodges proposed through this current

application includes changes to the footprint sizes, positions and heights of some of the proposed 22 holiday lodges when compared to the indicative development approved by the grant of planning permission in principle 18/01123/PPM.

Of the 22 lodges, six 3-bed lodges have been sited on the lower ground level of one of the former fairways of the former golf course with rising landform to the southwest and southeast of them. A further six lodges have been and would be positioned to the southeast of the woodland area of Whitekirk Covert with gently rising landform to the southeast of them and the woodland area to the southwest of them. The remaining ten small (micro) lodges are and would be positioned on a relatively flat plateau of land to the northeast of the woodland area of Whitekirk Covert with falling landform to the north of them. In such positioning the proposed 22 holiday lodges would be in general locations shown for lodges on the indicative masterplan of planning permission in principle 18/01123/PPM.

Although none of the individual holiday lodges would be positioned on the same footprint as those indicatively shown for this part of the wider land at Whitekirk Hill, with the exception of the arrangement of the 10 small (micro) holiday lodges, which are shown to be positioned further to the north at the crest of a slope of Whitekirk Hill than was shown for lodges of the northern cluster of Phase 1.3 on the indicative masterplan, the details submitted with this planning application show that the majority of the proposed and retrospective 22 holiday lodges that are the subject of this application would be positioned generally in the same locations on the northeast part of the site at Whitekirk Hill and would be and are generally in the same clustered arrangements as shown for them on the indicative masterplan.

The indicative masterplan drawing docketed to planning permission in principle 18/01123/PPM shows that the lodges on Phase 1.3 and on part of the land of Phase 1.2 (together now known as Phase 2) would have footprints varying from 50 square metres up to 180 square metres. The details submitted in this current application show that the footprint of the small (micro) lodges would be some 28 square metres and the footprint of the large 3-bed lodges would be some 100 square metres. In this regard, the proposed and retrospective 22 holiday lodges are generally each of a smaller footprint than the indicative footprints shown on the indicative masterplan drawing docketed to planning permission in principle 18/01123/PPM.

The indicative masterplan drawing docketed to planning permission in principle 18/01123/PPM shows that of the holiday lodges of Phases 1.2 and 1.3 would be either single storey or one and a half storey in height. The details submitted in this current application show that all of the 22 holiday lodges would be single storey in height with a roof ridge height above ground level of some 4.0 metres.

In all of this, the positions, height, footprint size and scale of the now proposed and retrospective 22 holiday lodges on this part of Whitekirk Hill do not strictly accord with the positions of the lodges indicatively approved for this part of the land of Whitekirk Hill. Nonetheless, in terms of the principles of their positions, footprint size, height and scale, the now proposed and retrospective 22 holiday lodges would and do generally accord sufficiently with the principles of design set by condition 1 of planning permission in principle 18/01123/PPM, albeit that the ten small (micro) lodges would be positioned further to the north at the crest of a slope of Whitekirk Hill.

The proposed and retrospective 22 holiday lodges would be located either on the lower ground level or on a general, if sloping, plateau of land that were former fairways of the former golf course. This fairway and plateau form the main bodies of the current application site. With the exception of the land to the north of the 10 small (micro) lodges, these areas

of land have rocky outcrops, raised undulating landform and vegetation, including the Whitekirk Covert woodland, intermittently to the majority of all sides of them. The exception to this is the land to the north of the 10 small (micro) lodges, which falls away down a gorse covered slope to a lower ground level. In such positioning, other than for the 10 small (micro) lodges, the 12 large 3-bed lodges are relatively well contained on the lower fairway ground and the plateau by the other landscape features of Whitekirk Hill.

In their proposed and retrospective positions, the 10 small (micro) lodges occupy a more exposed position on the former golf course land of Whitekirk Hill. That said, the slope of land to the north of their position includes areas of gorse planting which the application drawings indicate are proposed to be supplemented by additional gorse planting and small tree planting in order to provide integration of the proposed and retrospective 10 small (micro) lodges into the landscape setting of Whitekirk Hill.

The proposed and retrospective 22 lodges would be and are positioned in three loose clusters in a manner generally similar to the indicative clusters of holiday lodges approved by the grant of planning permission in principle 18/01123/PPM.

Although all of the proposed and retrospective 22 holiday lodges would be single storey in height, the 12 large 3-bed lodges with a footprint size of 100 square metres would be and are nonetheless large buildings in terms of their size, scale and massing. Furthermore, although they would be and are set on the lower ground level of the former fairway and on the plateau and would be and are of single storey height, in some views of them, some parts of some of their roof ridges would and do break the ridge lines of this part of Whitekirk Hill and thus are partially visible in views from the A198 to the northeast.

The lower former fairway land that comprises the eastern main body of this application site and on which 6 of the large 3-bed holiday lodges are positioned is part of the southeast slopes of the hillside of Whitekirk Hill and is generally well contained by rising landform to its southeast, southwest and northwest sides of it. To the northeast, the lower former fairway land continues to slope downwards to the northeast towards the existing 'Whitekirk Hill' leisure building. In their position on this part of the land of Whitekirk Hill, the 6 large 3-bed holiday lodges are not readily visible in public views outwith the site from the A198 public road to the southeast of the application site. Although largely contained by the landform of the site, some parts of the roofs of some of these 6 large 3-bed holiday lodges is visible in longer range public views from the northeast. However, such views are long range and of short duration and the visible parts of the 6 large 3-bed holiday lodges are dark coloured and are seen in the context of the existing landform and landscape features comprising trees on other parts of Whitekirk Hill and the rising landform beyond them to the southwest and northwest and the greater scale and massing of the existing 'Whitekirk Hill' leisure building to the northeast of them.

The plateau of land that comprise the second western main body of this application site on which 16 of the proposed and retrospective 22 holiday lodges would be and are positioned is located at a higher ground level of the southeast slopes of Whitekirk Hill. The proposed and retrospective 16 holiday lodges positioned on this area of land are split into two cluster groups; 6no. large 3-bed lodges and 10no. small (micro) lodges. The Whitekirk Covert woodland provides containment for part of the northwest side of this plateau of land, and gradually rising land to the southeast and southwest provides some containment from those sides. To the northeast/north of the plateau, the land falls away down the slope of the north side of Whitekirk Hill. Due to such containment on their northwest, southwest and southeast sides, the majority of the proposed and retrospective 6no. large 3-bed lodges that would be and are positioned on the southern part of this plateau are not readily visible in views from outwith the site from those directions.

However, due to their elevated position at the crest of the north hillside slope of Whitekirk Hill, the 10 small (micro) lodges and the northern most lodge of the 6no. large 3-bed lodges are and would be visible to varying degrees above and between the undulating landform and vegetation surrounding the plateau of land in public views from the north in long range views from the classified A198 public road, to the northeast and north of the site and from other secondary roads to the northwest, including the road approaching Gleghornie Farm. In such positions, their uniform angular man-made form would and does contrast with the otherwise organic forms of the outcrops, trees and other vegetation of Whitekirk Hill.

In views from the northwest of the site on the minor road to the east of Balgone, the proposed and retrospective 10 small (micro) lodges in the positions proposed for them would appear more prominent than the development approved in principle by the grant of planning permission 18/01123/PPM. In this view there is no containment or rising landform beyond the 10 lodges and they would and do appear as uniform man-made shapes in contrast with the uneven organic shape of the outcrops of the brow of the hill.

The significance of the impact of any such views from the north/northeast of the proposed and retrospective 10 small (micro) lodges and their car parking areas on the appreciation of the rocky outcrop of Whitekirk Hill would be and is reduced due to the external finishing colours of the lodges and their setting against the rising landform to the south of them and the Whitekirk Covert woodland to the west of them.

As referred to earlier in this report, the application drawings indicate that the existing gorse of this northern slope of Whitekirk Hill is proposed to be supplemented by additional gorse shrub and tree planting to the north of the positions of the proposed and retrospective 10 small (micro) lodges and to the south of the lodges at the western end of the row of small lodges, all in order to provide landscape integration for them.

The **Council's Landscape Officer (Policy and Strategy)** has considered the Landscape and Visual Impact Assessment addendum submitted with the application and the landscape planting scheme. The Landscape Officer advises that the proposed and retrospective 10no. small (micro) holiday lodges would be visible in long range views from the north/northeast from the A198 classified public road and from the John Muir Way national path route to the west of the site on the minor road to the east of Balgone.

The Landscape Officer comments that the development indicatively approved for Phase 1.3 by the grant of planning permission in principle 18/01123/PPM formed a dominant skylined element in views from the north/northeast, and that although of no greater height, the proposed and retrospective holiday lodges would be and are now positioned in a more linear layout extending further to the east and west and being positioned further north on the hill. Although in some views the Whitekirk Covert woodland would provide a backdrop, thereby providing setting and enclosure for some of the lodges, the proposed and retrospective 10no. small (micro) lodges and their parking area would nonetheless be visible in views from the north/northeast/northwest.

The Council's Landscape Officer (Policy and Strategy) advises (see landscape comments later in this report) that much of Whitekirk Hill is identified in the Tree and Woodland Strategy (TWS) for East Lothian as a preferred area for tree planting and woodland creation. In respect of all views, including from the northwest, of the proposed and retrospective 10 small (micro) lodges, the Landscape Officer recommends that in addition to the tree and scrub planting shown on the application drawings, additional tree and scrub (gorse) planting should be undertaken to the south of them, between them and their car parking areas, and to the north of them and between the individual lodges, and the addition of tree planting within the existing areas of gorse and the provision of new scrub planting (i.e. gorse) immediately to the north side of the 10 small lodges at a similar level on the

hillside would in time, once established, reduce their visual impact by giving the effect of visually extending the woodland and in due course creating an enhanced setting for the 10 small lodges, which would help to mitigate and soften their uniform shape on the skyline. The Landscape Officer comments that such planting should be positioned sensitively to retain and enhance the rocky outcrop features of Whitekirk Hill, and that once established such planting would also help to mitigate the visual impact of light spillage from the lodges.

On the matter of the visual impact of light spillage from the proposed and retrospective 22 holiday lodges, the Landscape Officer further advises that any mitigation of light spill afforded to the development by additional landscape planting would take time to become established and therefore it is recommended that any external lighting of the development is designed to reduce light spill. The Landscape Officer recommends that all lighting be contained within the proposed and retrospective 22 lodges and that there be no external lighting to balconies or decks/patios, and that any lighting of roads and footpaths should be low level bollard style lighting, in order to reduce widespread visual impacts.

Such recommended landscape planting, when established, would in time supplement the existing trees and vegetation of Whitekirk Hill and would afford further containment and setting for the proposed holiday lodges, thereby somewhat softening their angular form within their landscape setting. Subject to such landscape planting, a detail that could be secured by a condition attached to a grant of planning permission, the proposed and retrospective holiday lodges at the northern end of the western part of the site would have a less than substantial localised impact on the landscape character of the area in any such long range views as there are and would be of them from outwith the site.

Notwithstanding their contrasting form, subject to the aforementioned landscaping, the proposed and retrospective holiday lodges at the northern end of the western part of the site would be seen in the context of the existing outcrops, trees and other vegetation of Whitekirk Hill, and would also be seen in the context of the proposed landscape planting, including additional areas of gorse and trees, and in such context their contrasting man-made form would have a less than substantial impact on the landscape character of the area in such long range views as there are and would be of them from the northwest, north and northeast. In such circumstances their impact on the Whitekirk and Balgone Outcrops Special Landscape Area (SLA) is localised and they would not and do not have a significant detrimental overall impact on the landscape character of the wider Whitekirk and Balgone Outcrops Special Landscape Area (SLA).

By their positioning on the fairway and plateau of land and the degree of containment afforded to those areas of land by the surrounding landform and vegetation, and due to the intervening higher land of the southeast part of Whitekirk Hill, and due to the lower level of the village of Whitekirk, the proposed and retrospective 22 holiday lodges and their associated works would not be and are not readily visible from the village of Whitekirk to the south of the site and the classified A198 public road to the southeast of the site.

Nor would be or are the proposed and retrospective 22 holiday lodges and their associated works readily visible in views from the public right of way of Becky's Strip that passes to the west of the former golf course land of Whitekirk Hill.

The proposed and retrospective holiday lodges are visible from informal footpaths on Whitekirk Hill. However, such paths are provided for the use and enjoyment of the tourists and customers of the 'Whitekirk Hill' tourism and leisure business as well as by nearby residents, and walking or cycling on the land of that business a person would anticipate to have such close range views of such parts of the tourism and leisure business.

The details submitted with the application show that the ground levels of the main bodies of the site would be and have been largely kept as existing with only minimal areas of cut and fill being carried out in the siting of the proposed and retrospective 22 holiday lodges. Notwithstanding this, in their positional arrangement on the fairway and plateau of land, and with their single storey heights some of the 22 holiday lodges would and do break the ridge line, predominantly of the northern slope of this part of Whitekirk Hill. However, Whitekirk Hill continues to rise to the south/southeast of the fairway and of the southern end of the plateau of land, and as set out earlier in this report, in the long range views of them from the northwest, north and northeast, the proposed and retrospective 22 lodges would be viewed against the backdrop of the undulating land of Whitekirk Hill and the existing and proposed landscaping. In these views, the proposed and retrospective 22 holiday lodges would be and are viewed in the context of the higher land of Whitekirk Hill to the south/southeast of them, the undulating landform of Whitekirk Hill, including its rocky outcrops and the trees of the Whitekirk Covert and the existing and proposed landscaping. The proposed and retrospective 22 holiday lodges would also be seen in the context of the existing leisure facilities club building located some 150 metres to the northeast of the eastern main body of the site. In such views, the proposed and retrospective 22 holiday lodges would and do have little overall impact on the character of the wider area and SLA.

The proposed and retrospective holiday lodges would be and are of a simple architectural form and design. The 10 small (micro) lodges with their narrow single storey gabled form are similar in form to some of the 9 lodges approved through the grant of planning permission 20/00747/AMC on Phase 1.1 of the development at Whitekirk Hill. The 12 large 3-bed lodges although still of a gabled form have a distinctly shallower roof pitch. The two different but simple vernacular forms of the 22 holiday lodges are not dissimilar to other buildings that can be seen in the wider landscape. Moreover, although the proposed and retrospective holiday lodges would be and are of differing scales and massing and in some instances would be and are substantial in scale, there are a variety of buildings in the surrounding countryside that are of a variety of scales and massing, and which are not dissimilar to the scale and massing of the proposed and retrospective 22 holiday lodges.

A simple palette of external finishes of corrugated profile metal sheeting (coloured Anthracite grey, RAL 7016) for the external walls and roofs of the 10 small (micro) lodges, and vertical timber cladding (coloured Anthracite grey, RAL 7016 and light grey) for the walls of the 12 large 3-bed lodges and corrugated profile metal sheeting (coloured Anthracite grey, RAL 7016) for the roofs of the large lodges is proposed and has been used. The roofs of all of the 22 holiday lodges would be and are finished in one dark grey colour. The frames of windows and external doors and the external doors would be and are of dark grey coloured composite or metal construction.

This simple palette of external colours (Anthracite Grey - RAL 7016 and light grey) is similar to some of the colours used for the external finishes of Phase 1.1 of the holiday lodge development at Whitekirk Hill. Such combination of dark and light colours would not be and is not dissimilar to the colours of rock outcrops of this part of Whitekirk Hill and the colours of the sky above the hill, and all of these colours would reflect the ever changing shadows on the hillside as the light passes over it. This simple colour palette would minimise the landscape impact of the proposed and retrospective 22 holiday lodges, whether during the day or at night. Accordingly, on this design consideration of external finishes and colours, the proposed and retrospective 22 holiday lodges would not and do not appear overly dominant and incongruous within their landscape setting and thus would not and do not have a harmfully unacceptable impact on the landscape character of the area.

Once built the proposed and retrospective 22 holiday lodges would benefit from permitted development rights to change the colour of them through the application of a different

colour without the need for further planning permission. As a change to the colour of the proposed and retrospective 22 holiday lodges could have a detrimental impact on the character and appearance of the development within its landscape setting and thus also a harmful impact on the landscape character of the area it would be prudent for the Planning Authority to removed permitted development rights for the proposed and retrospective 22 holiday lodges under Class 9 of Part 2 of Schedule 1 of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 (as amended, revoked or re-enacted). This detail could be controlled by a condition of a grant of planning permission.

By the approval of planning permission in principle 18/01123/PPM, the principle of the development of a part of the northeast part of Whitekirk Hill for a development of a total of 41 holiday lodges is approved, including the proposed and retrospective 22 holiday lodges comprising this application, and thus, it is accepted that there will be a degree of visual impact on the landscape, including to this part of the Whitekirk and Balgone Outcrops Special Landscape Area, and on the character of the wider landscape setting, from the physical form of the proposed and retrospective holiday lodges and their associated access road, footpaths and parking areas, as well as from the external lighting of the access road, footpaths, parking areas, and holiday lodges, and from internal light spill escaping from the proposed and retrospective holiday lodges, for which the principle is approved.

Details of the external lighting of the access road, footpaths and parking areas are required by condition 13 of planning permission in principle 18/01123/PPM, and specifies that the external lighting structures shall be of a low height and a bollard style design.

Details of the proposed external lighting units have been submitted for Phase 1.1 of the holiday lodge development through planning permission in principle 18/01123/PPM, and those details show that the proposed external lighting units for that part of the holiday lodge development would be bollard style LED slot lighting units, measuring some 470mm in height. They would be of metal construction with a rusty brown coloured finish and downward facing LED slot illumination.

Contrary to that stated in the supporting letter submitted by the applicant's agent, the application drawings do not include any details of proposed external lighting for the proposed and retrospective 22 holiday lodges. The Energy Statement submitted with the application states that the proposed and retrospective 22 holiday lodges would be fitted with low-energy LED lighting.

In the absence of any details of the proposed external lighting for the proposed and retrospective 22 lodges, any self-timers within the buildings, any external lighting bollards for road, paths and parking areas and appropriate light spill calculations relating to such details, it would be prudent for the Council as Planning Authority to impose a conditional control on any grant of planning permission for such details to be provided within 3 months of the date of a grant of planning permission.

On the matter of the type of glazing used for the windows of the proposed and retrospective 22 holiday lodges, which is a design criteria of condition 1 of planning permission in principle 18/01123/PPM, no statement has been made by the applicant's agent on this matter.

The application drawings for the current application show that the small (micro) lodges have been designed with a principal façade with a large area of glazing that opens onto a private terrace and that other facades of the small (micro) lodges would be largely blank other than for a glazed entrance door on one long side. The proposed terrace would project some 1 metre beyond the glazing of the principal façade of the small lodges and would be



wholly enclosed along two sides and over its roof. The principal façade of each of the proposed and retrospective 10 small (micro) lodges would and do face northwards to the views towards the coastline. The large 3-bed lodges are designed with large areas of glazing predominantly on one long side, with a glazed entrance door and two modest sized windows on their other long side, and with only one small window opening on each of their gable elevations. The large 3-bed lodges are not designed with an enclosed private terrace. Rather they are designed with a stepped timber deck area outside the predominant large area of glazing of one long side. The principal elevations of the proposed and retrospective 12 large 3-bed lodges would be and are orientated to face generally towards the respective part of the access road from which they would be and are accessed.

On review of the application drawings, the proposed and retrospective 10 small (micro) holiday lodges have been designed with the majority of glazing on one elevation and with that elevation recessed within a 1-metre-deep enclosed terrace, and as such light spill would be and is minimised from those proposed and retrospective 10 small lodges.

The proposed and retrospective 12 large 3-bed holiday lodges have a greater amount of glazing on one of their two long elevations and the application drawings show that they would be and have been sited predominantly with their principal glazed elevation facing towards the respective lengths of access road. By such positioning, light spill from those principal glazed elevations is primarily directed inwards towards the site.

In this countryside location, where groups of buildings are intermittently dispersed within the landscape, although the proposed and retrospective 22 holiday lodges would incorporate design features that would minimise light spill, the light spill from the proposed and retrospective 22 holiday lodges would nonetheless be visible in what is at present a relatively unlit area. However, by the approval of planning permission in principle 18/01123/PPM, it is accepted that there will be a degree of visual impact on the landscape from the development of the site, and on the character of the wider landscape setting, from the proposed and retrospective holiday lodges and including from the external lighting of them and of the access road, footpaths, parking areas. Subject to the aforementioned planning control for details of the external lighting of the lodges and the roads, paths and parking areas to be submitted to and approved by the Planning Authority and thereafter the external lighting installed complying with the details so approved, the design of the fenestration of the proposed and retrospective lodges, enclosed terraces and of their external lighting provision are such that they would minimise light spill into the wider landscape. In such views as there would be of the proposed and retrospective 22 holiday lodges and their associated access road, footpaths and parking areas, such light spill would be afforded some containment by the positional configuration of the proposed and retrospective 22 lodges and the undulating landform and vegetation of this part of Whitekirk Hill and by the proposed additional landscape planting referred to earlier in this report of handling. For these reasons and due to the fenestration of the majority of the elevations of the proposed lodges being minimised and otherwise on the principal facades the windows being recessed within a 1.0 metres deep enclosed terrace or oriented inwards towards the site, glare from sunlight striking the windows of the proposed and retrospective 22 lodges would also be minimised.

Accordingly, in these specific circumstances and in the context of the specific positional configuration of the proposed and retrospective 22 holiday lodges, the design of their windows and enclosed terraces, and subject to the aforementioned planning control for the details of external lighting of the lodges, their roads, paths and parking areas being approved in advance by the Planning Authority, the light spill and glazing reflection from the proposed and retrospective 22 holiday lodges, although visible within the landscape, would not be overly dominant and obtrusive within the landscape so as to be harmful to

the landscape character of the area. Nor in any cumulative views with the holiday lodges approved by Phase 1.1 (Planning permission 20/00747/AMC) would any cumulative impact of the lighting of the existing and proposed phases of development at Whitekirk Hill be so overly dominant and obtrusive within the landscape so as to be harmful to the landscape character of the area.

Although this position is taken in respect of the proposed and retrospective 22 holiday lodges (Phase 2) the subject of this application for planning permission, the Planning Authority reserves its right to reassess this position and if deemed necessary to impose more restrictive measures in respect of the cumulative impact of further Phases of the holiday lodge development for which planning permission in principle 18/01123/PPM is approved.

Once built the proposed holiday lodges would not benefit from permitted development rights for the formation of further windows or other glazed openings, and thus no further windows or other glazed openings could be formed without the need for further planning permission, thus allowing the Planning Authority to assess the appropriateness of any alterations to the proposed holiday lodges within their landscape setting.

Accordingly, on all of these design considerations, although 12 of the proposed and retrospective 22 holiday lodges would be and are of a substantial size and although 11 of the proposed and retrospective 22 holiday lodges would be and are visible in long range public views from the north, northwest and northeast, by virtue of their size, height, scale, massing, form and external finishes and colours, and in their specific configuration, and positioned as they would be and are on the land of a former fairway and plateau of the former golf course, and seen as they would be against the backdrop of the greater mass of Whitekirk Hill and in the context of the degree of containment afforded to them on the fairway and plateau of land, and in the context of the local undulating landform of that hill and its vegetation, including the trees of the Whitekirk Covert, and seen as they would be in the context of the existing leisure facility building to the northeast of the site, and subject to the recommended landscape condition requiring landscape planting of the site, including its peripheral edges, the proposed and retrospective 22 holiday lodges would not and do not appear overly dominant and incongruous within their landscape setting, would not and do not dominate the skyline of Whitekirk Hill and thus would not and do not have a harmfully detrimental impact on their landscape setting whether by day or by night. They would not be and are not harmfully intrusive, incongruous or exposed features, and would not be and are not harmful to the landscape character and visual amenity of the area.

The proposed lengths of access road would serve as both vehicular and pedestrian access to the proposed and retrospective 22 holiday lodges. The application drawings show the proposed lengths of access road would be some 3.7 metres in width, would be surfaced with a locally quarried gravel finish and would, generally, follow the undulating form of the land of the application site. There would be no kerbed edges to the proposed access road.

Condition 1 of planning permission in principle 18/01123/PPM requires that the proposed access road shall be no wider than 3.7 metres in width, with the provision for passing places, and that the surface finish of the roads, parking and turning areas and footpaths shall be designed and coloured to minimise visual intrusion. These design criteria would ensure that the proposed access road, parking and turning areas and footpaths would not have a harmfully detrimental impact on the landscape character and amenity of the area, including of the landscape character of the Whitekirk and Balgone Outcrops Special Landscape Area and the setting of the Whitekirk Conservation Area.

Subject to the locally sourced gravel finish of the proposed lengths of access road being

an appropriate colour to minimise the visual intrusion of the access road in long range views of the site, a detail that could be controlled by a condition attached to a grant of planning permission, the proposed lengths of access road would accord with the design criteria set by condition 1 of planning permission in principle 18/01123/PPM. The width of the access road along with the un-kerbed road edge and gravel surface finish would serve to reinforce the holiday accommodation nature and character of the proposals, and to set the development apart in character from a residential development, ensuring that the proposed access road would not resemble a residential street.

The proposed lengths of access road would generally follow the existing undulating levels of the land and the application drawings show that excavation and infill would be kept to a minimum along its length.

The proposed lengths of access road would be visible in long range views from the A198 classified public road to the north/northeast of the site and may be partially visible in views from other secondary roads to the northwest, including the road approaching Gleghornie Farm. Due to the undulating landform and their positioning they would not be readily visible in public views from the A198 classified public road to the south/southeast of the application site.

Subject to the lengths of access road being no wider than 3.7 metres with the provision of passing places, and subject to its surface finish being a dark colour finish and the detail of that specific colouring being approved in advance by the Planning Authority, details that can be controlled by a condition(s) attached to a grant of planning permission, although the proposed lengths of access road would be partially visible in long range public views its impact on the landscape of Whitekirk Hill and the wider area would be minimised by its narrow width and its dark colouring. In this specific context and seen as it would be in the context of the undulating landform of Whitekirk Hill, and in the context of the proposed and retrospective 22 holiday lodges and the larger holiday lodge development for which planning permission in principle is already approved, and in the context of the existing leisure facilities building at Whitekirk Hill, the proposed access road would be contained as part of that larger development and would not appear as a harmful feature within its particular landscape setting.

The application drawings show that the parking areas for each of the proposed and retrospective 22 holiday lodges would be finished with reinforced grass and that the footpaths of the proposed and retrospective 12 large 3-bed lodges and some of the footpaths of the 10 small (micro) lodges would also be finished with reinforced grass. The remaining footpaths of the 10 small (micro) lodges would be finished with a locally sourced gravel finish. Notwithstanding that shown on the application drawings, the parking areas and footpaths of the 6 large 3-bed holiday lodges that have already been erected on the main eastern part of the site are surfaced with a red/brown gravel. In some instances the proposed parking areas would be large in size. By virtue of their size and number and in the context of the size of some of the proposed parking areas, the use of a reinforced grass finish for the surface of these retrospective parking areas and footpaths, and of the other remaining proposed parking areas and footpaths as shown on the application drawings would be a more appropriate and less visually intrusive surface finish, than is and would be the red/brown gravel surface finish. Thus, subject to a conditional control that the parking areas and footpaths of the retrospective 6 holiday lodges on the eastern main body of the application site that have already been formed be changed to a reinforced grass finish within 6 months of the date of this grant of planning permission, a detail that could be secured through a condition attached to a grant of planning permission, and that otherwise the parking areas and footpath shall be surfaced in accordance with the details shown for them on the application drawings, all being details that can be controlled by conditions attached to a grant of planning permission for matters specified in conditions,

in their positions alongside the proposed and retrospective 22 holiday lodges on the application site, the proposed parking areas and the footpaths would be largely contained within the clusters of proposed holiday lodges. In any partial long range views of them, they would be seen in the context of the greater bulk and massing of the proposed and retrospective 22 holiday lodges and, where they are proposed to be surfaced in gravel, such gravel finish being an appropriate dark colour, a detail that can be secured through a condition attached to a grant of planning permission, the proposed parking areas and footpaths, in their ground level positioning and their surface finishes would not appear as harmful intrusive or incongruous features within their landscape setting.

Subject to the aforementioned controls regarding the width of the access road and the final colour of its surface finish, and the final colour of the surface finish of the parking areas and footpaths, the proposed lengths of access road, parking and turning areas and footpaths would not have a harmfully detrimental impact on their landscape setting. They would not be harmfully intrusive, incongruous or exposed features, and would not be harmful to the landscape character and visual amenity of the area.

The woodland of Whitekirk Covert is located to the northwest of the position of the six large 3-bed holiday lodges on the western plateau of the application site and to the west of the ten small (micro) lodges. In their position on the site, the ten small (micro) lodges are also located close to areas of gorse on the site.

The **Council's Landscape Officer** welcomes the repositioning further to the east of the three western most large 3-bed holiday lodges and the repositioning further to the southeast of the western most three small (micro) lodges and the eastern most small (micro) lodge on the western plateau of the application site. As the works to create the bases for the three western most large 3-bed holiday lodges and the western most three small (micro) lodges has already been undertaken and in some cases the lodges themselves have been installed, the Landscape Officer advises that the erection of temporary protective fencing to protect the trees roots would not serve any purpose as the root protection areas of the woodland edge trees have already been encroached upon and any damage to their roots has already occurred. The Landscape Officer therefore recommends that the condition of the woodland edge trees (closest to the holiday lodges) be monitored and that new tree planting be proposed elsewhere on the site to mitigate for the potential loss of these trees in the future due to the likely damage to their roots. These requirements for such monitoring and replacement tree planting can be controlled by conditions attached to a grant of planning permission.

The Landscape Officer welcomes the use of a reinforced grass surface finish for the parking areas of the proposed and retrospective holiday lodges as this is a more appropriate surface finishing material than gravel and will help their integration into their surroundings. However, it is noted that the parking spaces for the six large 3-bed lodges that are on the eastern former fairway of the application site have been formed and finished with gravel. It would therefore be prudent for the Planning Authority to seek to secure that the gravel surfacing of these parking areas are removed and replaced with the reinforced grass finish detailed on the application drawings within 3 months from the date of the grant of planning permission. This requirement can be controlled by a condition attached to a grant of planning permission.

The Landscape Officer advises that much of Whitekirk Hill is identified as a preferred area for tree planting and woodland creation in the Tree and Woodland Strategy (TWS) for East Lothian, and that to support the TWS it is recommended that additional small species tree planting should be undertaken within the proposed gorse planting areas on the northern part of the western area of the application site. The Landscape Officer further advises that the scheme of planting for the site, as detailed on the application drawings, is insufficient

and should be supplemented by further tree and scrub (gorse) planting, particularly in the vicinity of the 10no. small (micro) lodges. Such additional areas of planting combined with that already detailed on the application drawings would not only implement the TWS but also increase the setting and context/integration of the proposed and retrospective 22 holiday lodges. Any areas of planting for woodland creation should avoid the parts of the site where it would impact on appreciation of the outcrops, such as within the gorse areas of the highest parts of Whitekirk Hill. The requirement for such additional tree planting could be made a condition of a grant of planning permission.

Subject to the aforementioned planning controls to secure the employment of an arboriculturist and securing arboricultural monitoring, additional landscape planting, and the replacement of gravel surfaced parking areas for reinforced grass surfacing, although by their presence they would change the landscape character of this part of the Whitekirk and Balgone Outcrops Special Landscape Area, the proposed and retrospective 22 holiday lodges and the associated access road, parking and turning areas and footpaths, by virtue of their specific positioning, orientation, size, scale, massing, architectural form and appearance, external finishes and colours, and contained as they would be on this northeast part of Whitekirk Hill as part of the 41 holiday lodge development approved by the grant of planning permission in principle 18/01123/PPM, and subject to the aforementioned planning controls on landscape planting and finishing materials and colours, would not be out of keeping with the scale of the buildings of this part of the Special Landscape Area, and their impact on the landscape would be minimised, and as such they would not appear overly dominant and intrusive within their landscape setting in this part of the SLA. Thus, although the proposed and retrospective 22 holiday lodges would change the landscape character of this part of the Whitekirk and Balgone Outcrops Special Landscape Area, they would be part of the changed landscape resulting from the holiday lodge development approved in principle by the grant of planning permission in principle 18/01123/PPM, and such degree of localised harm as would occur in this part of the SLA is considered to be acceptable in the context of the direct and positive economic benefits that would accrue to the county from the proposed holiday lodge development as approved by the grant of planning permission in principle 18/01123/PPM. Thus, overall the proposed and retrospective 22 holiday lodge development would not appear overly dominant and intrusive within its landscape setting, and would not be detrimentally harmful to the character of the Special Landscape Area.

NPF4 Policy 3 states that national or major development types or development that requires an Environmental Impact Assessment (EIA) will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks so that they are in a demonstrably better state than without intervention, and this will include future management. The development the subject of planning permission in principle 18/01123/PPM, of which the current proposals are for matters specified in conditions of planning permission in principle 18/01123/PPM, are such an EIA development. They were however approved prior to the adoption of NPF4. Guidance on securing positive effects for biodiversity enhancement can be found in NatureScot's 'Developing with Nature' guidance.

NatureScot comment that the development of the 41 holiday lodges approved by the grant of planning permission in principle 18/01123/PPM is EIA development and therefore that NPF4 Policy 3 requires that biodiversity enhancement measures for the development of the 22 holiday lodges the subject of this current application should go beyond mitigation and compensation to ensure net positive effects for biodiversity are achieved. They recommend that consideration be given to how the development the subject of this current application could deliver positive effects for biodiversity, and suggests that there are opportunities for biodiversity enhancement on the site including, but not exclusively, tree planting, removal of invasive species and grassland restoration.

A Preliminary Ecological Appraisal report (dated December 2023), a Biodiversity Enhancement Plan Rev A (dated January 2024) and Planting Notes and Landscape Maintenance and Management Proposals (dated December 2023) have been submitted with the application.

The **Council's Biodiversity Officer** comments that there is badger activity in the area but that the Preliminary Ecological Appraisal report considers this.

The Council's Biodiversity Officer recommends that no development should be undertaken during the breeding bird season (March to August), unless in strict compliance with a Species Protection Plan for breeding birds that shall be submitted to and approved in writing by the Planning Authority.

The Biodiversity Enhancement Plan (BEP) submitted with the application and the application drawings propose, but not exclusively, to:

- deliver tree and structure shrub planting;
- where top-soil is proposed to be removed in areas of cut, such top-soil with its existing seed bank shall be retained and stored for re-use elsewhere on the site to re-establish native flora;
- use of meadow grass seed mixes; and
- installation of bird boxes, bat boxes, insect boxes and hedgehog boxes.

The Council's Biodiversity Officer comments that clarification is required on the areas of grassland that would be identified for 'wildflower meadow' management and such areas would need to be substantial enough to be considered to contribute to biodiversity enhancement. The Council's Landscape Officer further comments that the Landscape Planting and Maintenance and Management Proposals report refers to the use of fertilisers which is not appropriate in the management of wildflower meadow grass.

The submitted Biodiversity Enhancement Plan (BEP) provides some information on how biodiversity on the site would be conserved, restored and enhanced. However, that document does not include the up-to-date landscape planting plan and clarification has not been provided on which areas of grassland would be set aside for 'wildflower meadow' management. Nor is there a timescale for the implementation of the biodiversity enhancement measures.

Notwithstanding that parts of the development have already been undertaken, it would not be unreasonable for the Planning Authority to seek to impose conditional controls on the completion of the remaining parts of the proposals in order to secure:

- Monitoring for breeding birds on the site and the submission of a Species Protection Plan for breeding birds;
- The submission and implementation of a scheme of biodiversity enhancement on the site, to include but not exclusively, tree planting, removal of invasive species and grassland restoration and to include details of the area(s) of grassland to be managed as 'wildflower meadow'.

Subject to the aforementioned planning controls, the proposed and retrospective development would deliver biodiversity enhancement for the site and thus would not conflict with NPF4 Policy 3 and ELLDP Policy NH5.

As stated previously in this report, there are no listed buildings within the application site. There are however a number of listed buildings outwith the application site in the wider area, including the Category A listed Tithe Barn (or Granary), the Category A listed

Whitekirk Parish Church, the Category B listed Whitekirk Manse with retaining walls and gate piers, the Category B listed Whitekirk Mains Farmhouse with boundary walls, the Category B listed Newmains Farmhouse, the Category C listed Whitekirk Primary School and retaining wall, and the Category C listed 8 and 10 Whitekirk Cottages (1 Post Cottage and 2 Farm Cottages). With the exception of Newmains Farmhouse, the other listed buildings are located in or close to the village of Whitekirk. All of these listed buildings are located outwith the application site and therefore a primary consideration in the assessment of these proposals is the impact on the setting of those listed buildings.

The nearest listed buildings are the Category A listed Tithe Barn located some 600 metres away to the south of the application site, the Category A listed Whitekirk Parish Church some 700 metres away to the south, the Category B listed Newmains Farmhouse some 600 metres away to the northeast. The other listed buildings are respectively 710 metres away to the south (8 and 10 Whitekirk Cottages), 750 metres away to the south (Whitekirk Primary School), 800 metres to the south (Whitekirk Mains Farmhouse) and 810 metres to the south (Whitekirk Manse).

By the grant of planning permission in principle 18/01123/PPM, the principle of the erection of 41 holiday accommodation lodges and associated works on the northeast part of the land of Whitekirk Hill is established, and there can be no objection in principle to such form of development on the site.

This application for matters specified in conditions proposes 22 holiday lodges on the part of Whitekirk Hill identified for Phase 1.3 and part of the land identified for Phase 1.2, and proposes that all of the 22 holiday lodges now proposed would be single storey in height, with a maximum roof ridge height of some 4.0 metres in height above ground level.

All of the proposed holiday lodges and associated works the subject of this current application are and would be a minimum of 600 metres away from the listed buildings and their settings. They have been positioned on the land of Whitekirk Hill so as to be located either in the lower ground level areas of the former golf course fairways or alongside the Whitekirk Covert woodland and areas of existing gorse planting where they would benefit from the immediate landscape context that such features provide. Furthermore, the intervening land between the development site and the listed buildings includes the undulations of the landform of Whitekirk Hill, the Whitekirk Covert woodland, other areas of trees, and other buildings within the wider landscape. Moreover, due to these intervening landscape features the listed buildings do not have a direct visual relationship with the parts of the land of Whitekirk Hill that are the subject of this application for planning permission. In these circumstances, and by virtue of the intervening distances, landform, landscape features and other buildings, due to such positioning away from the listed buildings and their settings, and by virtue of their low height and positioning on the site, the proposed and retrospective 22 holiday lodges and their associated works would not and do not harm the setting of the those listed buildings, which would remain the focus of their settings.

Therefore the proposed and retrospective works the subject of this application for planning permission would be and are sufficiently far removed from the listed buildings to ensure that they would not and do not harm the setting of those listed buildings.

Therefore, in conclusion on the matter of the setting of the listed buildings, the proposals would not and do not adversely affect the setting and therefore would and do preserve the setting of the nearby listed buildings in accordance with the Planning (Listed Buildings and Conservation Areas)(Scotland) Act 1997 and relevant Historic Environment Scotland guidance.

The application site is outwith the Whitekirk Conservation Area, the northern edge of which (at its closest) is some 70 metres away to the southeast of the application site.

By their positioning on the former fairway and plateau of land and the containment afforded to them by the surrounding landform and vegetation, and due to the intervening higher land of the southeast part of Whitekirk Hill, the proposed and retrospective 22 holiday lodges would not be and are not readily visible from the Whitekirk Conservation Area to the south of the site. However, some parts of the upper walls and roofs of some of the proposed and retrospective 22 holiday lodges would be and are likely to be visible above and between the undulating landform and vegetation surrounding the former fairway and plateau of land of the site in long range views from the Conservation Area. In such partial and long range views, due to their positioning and clustered arrangement on the site, their height, size, scale, massing, colouring, and the setting afforded to them by the existing vegetation, the proposed and retrospective 22 holiday lodges would not and do not have a detrimental impact on the character and appearance of the setting of the Whitekirk Conservation Area.

The Scheduled Ancient Monument of Whitekirk Hill Cairn is located some 280 - 300 metres to the south of the application site at the northwest edge of the Whitekirk Conservation Area. A further Scheduled Ancient Monument, Pilgrims House at Tithe Barn, is located some 600 metres away to the south of the application site.

Due to the elevated position of the of Whitekirk Hill cairn, the proposed and retrospective 22 holiday lodges would be and are partially visible from the cairn.

Due to the intervening distance and by virtue of their positions and their height, footprint size, scale, and external finishes, and by the containment afforded to them by the existing rising landform on their southwest and southeast sides and the existing vegetation of Whitekirk Hill and the proposed landscape planting, which in time would help to further integrate the development into its setting, the proposed and retrospective 22 holiday lodges would not and do not detract from the setting of the Scheduled Ancient Monument of Whitekirk Hill Cairn, some 280 metres to the south of the application site at the northwest edge of the Whitekirk Conservation Area and thus would not and do not have a harmful impact on the character and appearance of the setting of that scheduled monument.

Due to the Scheduled Ancient Monument of Pilgrims House at Tithe Barn being some 600 metres away to the south of the application site and on the lower slopes of the south side of Whitekirk Hill, the proposed and retrospective 22 holiday lodges and associated works would not be and are not readily visible in views of the setting of that scheduled ancient monument and thus would not and do not have an appreciable impact on the setting of that scheduled ancient monument and thus would not detract from the setting of the Scheduled Ancient Monument of Pilgrims House at Tithe Barn and would not have a harmful impact on the character and appearance of the setting of that scheduled monument.

Historic Environment Scotland (HES) advise that, as demonstrated in the landscape and visual assessment addendum and its associated visualisations, they welcome that there will be an improvement and reduced visibility of the proposed development from the scheduled monument of Whitekirk Hill, cairn (SM5873). HES further comment that although the updated proposals would result in a more linear spread of structures which would continue to be visible from the scheduled monument, the scale of the proposed development and the lower ridgelines of the lodges mean that it is unlikely that there would be significant impacts on the monuments setting.

Accordingly on the matter of the impact on the setting of the scheduled ancient monuments



of Whitekirk Hill Cairn and Pilgrims House at Tithe Barn, the proposed and retrospective development the subject of this application would not and does not conflict with NPF4 Policy 7 and ELLDP Policy CH4.

Nor in such positioning and by virtue of such existing and proposed containment and by virtue of such intervening distances would or does the proposed and retrospective development detract from or have a harmful impact on the setting of any nearby listed building, Inventory Garden and Designed Landscape, or Local Gardens and Designed Landscape.

An Archaeological Evaluation Data Structure Report (prepared by AOC Archaeology Group, dated November 2023) for the proposed development has been submitted with the application.

The **Council's Archaeology Officer** has reviewed this document and advises that the results of the report indicate that no further intrusive work is required. The Archaeology Officer also advises that the indirect impacts of the proposed and retrospective development appear to be in line with the assessment in relation to planning permission in principle 18/01123/PPM. Thus, the Archaeology Officer has no comments to make regarding the development the subject of this application.

On all of these foregoing design considerations and on the impact on heritage and cultural assets, and the impact on landscape and biodiversity, the proposed and retrospective 22 holiday lodges development would not and does not conflict with NPF4 Policies 3, 4, 6, 7, 14 and 30, and ELLDP Policies DC1, DC9, CH1, CH2, CH4, CH6, DP1, DP2 and NH5 or with ELLDP Supplementary Planning Guidance on Special Landscape Areas, PAN 2/2011: Planning and Archaeology or Sections 59 and 64 of Planning (Listed Building and Conservation Areas) (Scotland) Act 1997.

The nearest neighbouring residential properties are located some 600 metres away to the northwest and northeast, respectively, at Gleghornie and New Mains.

On the matter of the impact of the proposed development on daylight and sunlight on neighbouring properties, guidance is taken from "Site Layout and Planning for Daylight and Sunlight: A Guide to Good Practice" by P.J. Littlefair. By virtue of their height, positioning and distance away from neighbouring residential properties, the proposed and retrospective 22 holiday lodges would not and do not, in accordance with the Guide, give rise to harmful loss of daylight or sunlight to any neighbouring residential properties and therefore would not and do not have a harmful affect on the residential amenity of them.

Thus, on these considerations of loss of sunlight or daylight or loss of privacy, the proposed and retrospective 22 holiday lodges would not and do not result in harm to the amenity or privacy of any neighbouring land uses.

The proposed and retrospective development is not for residential houses, rather it is for holiday accommodation. Such form of holiday accommodation development does not have the same requirements for privacy and amenity as would a residential house. Thus, the Council's guidance relating to privacy distance requirements between the proposed and retrospective holiday lodges and on matters of amenity for sunlight and daylight for the proposed and retrospective holiday lodges are not applicable.

The **Council's Senior Environmental Health Officer** has no comment to make regarding the proposed and retrospective development the subject of this application.

On the matter of the heat recovery units to be installed on the holiday lodges, the Senior

Environmental Health Officer is satisfied that the separation distances to neighbouring sensitive receptors is adequate to mitigate against any noise from the heat recovery units.

Condition 7 of the grant of planning permission in principle requires the submission of a ground investigation report, including any remediation and validation, if required.

A Preliminary Environmental Assessment report prepared by Goodson Associates has been submitted with the application.

The **Council's Senior Environmental Compliance Officer (Contaminated Land)** has reviewed this report and confirms that the assessment has been carried out in accordance with best practice guidelines and the relevant standards. He agrees with the report that the potential overall risk from on-site contamination to the development is low, however although it is not considered likely that significant contaminative sources have been deposited within the site boundary, previous undocumented on-site activities may have resulted in the accumulation of contaminated material (such as ash and asbestos). He notes that taking this into account, and due to the absence of quantitative data, the report recommends that an intrusive investigation be carried out with the results informing the subsequent risk assessment reporting. The Senior Environmental Compliance Officer agrees with this recommendation and that the proposals for the site investigation works are satisfactory. Accordingly, the Senior Environmental Compliance Officer recommends that a condition be imposed to secure a Phase II Ground Investigation, remediation and validation (if required).

A number of the 22 holiday lodges the subject of this application have already been erected on the site and in the case of others the preparatory ground works have been undertaken.

The requirement for the ground investigation could be applied to the holiday lodges that have not yet been installed on the site. Therefore, the requirement for a Phase II Ground Investigation, remediation and validation (if required) can be secured by a condition of a grant of planning permission.

Condition 3 of the grant of planning permission in principle 18/01123/PPM requires the submission of a construction method statement that outlines the mitigation measures to be taken to minimise impacts of dust during the construction of the development. This conditional requirement remains relevant to the proposals for the development of Phase 2, which is the subject of this current application. It is not necessary to duplicate this control through a further condition.

Thus, on matters of privacy and amenity, and environmental considerations, the proposed and retrospective development the subject of this matters specified in conditions application is consistent with NPF4 Policy 14 and ELLDP Policy DP2.

Vehicular access to the development the subject of this current application would be and is taken from the A198 classified public road via the existing vehicular access and private access road that serves the existing multi-function leisure facility building at 'Whitekirk Hill' approved by the grant of planning permission 18/00312/P and which access route is indicatively approved for use by the 41 holiday lodges approved by the grant of planning permission in principle 18/01123/PPM and is used by the existing 9 holiday lodges (of Phase 1.1) approved by the grant of planning permission for matters specified in conditions 20/00747/AMC.

A new access road, including turning areas, would be formed from the south side of the existing private access road and would extend southwest to serve the proposed and retrospective 22 holiday lodges. Each of the 12 large 3-bed lodges would be provided with

either one or two parking spaces. The application drawings indicate that these parking areas would be finished with reinforced grass. The 10 small lodges would be provided with a shared parking area measuring some 50 metres by 6 metres from which reinforced grass footpaths and gravel surfaced footpaths would lead to the lodges. The shared parking area would be surfaced with reinforced grass.

The access road layout now proposed differs from that shown on the indicative drawings approved by the grant of planning permission in principle 18/01123/PPM. Those indicative details proposed that one access road would extend through the northern cluster of Phase 1.2 then turning west ahead of reaching the southern cluster of holiday lodges of Phase 1.2 and then extending north again through the two clusters of lodges of Phase 1.3.

The now proposed and retrospective development of 22 holiday lodges (Phase 2) still proposes a single access road however, the now proposed road would not extend as far to the southwest as does the indicatively shown access road, rather it turns northwest, crossing an undulation of the site before continuing west and southwest through the two clusters on the plateau of the western main body of the site.

The **Council's Road Services** raise no objection to the development the subject of this current application being satisfied that the proposed and retrospective 22 holiday lodges would be provided with a satisfactory means of access and a sufficient provision of on-site parking.

Accordingly, the proposed and retrospective development the subject of this application does not conflict with ELLDP Policies T1 and T2.

The proposed and retrospective 22 holiday lodges are part of the overall 41 holiday lodge development indicatively approved by the grant of planning permission 18/01123/PPM. As such there can be no objection in principle to the use of the site for holiday accommodation. The grant of planning permission in principle secured the provision of bus stops in either direction on the A198 classified public road and informal footpaths throughout the wider land of Whitekirk Hill. These latter securing connectivity to the core footpath and right of way that passes to the west/southwest of the larger area of land of the Whitekirk Hill, some 0.4 of a mile away to the west/southwest of the application site.

Although the site is in a rural location that will likely result in a high dependency on car journeys in association with the proposed and retrospective 22 holiday lodges, the development nonetheless benefits from access to those bus stops and the public footpath network, thus providing opportunities to customers and users of the holiday lodge accommodation for alternative travel options. Accordingly, the proposed and retrospective 22 holiday lodge development as part of the larger 41 holiday lodge development indicatively approved by the grant of planning permission in principle 18/01123/PPM has access to public transport and walking/cycling routes. Although the development the subject of this application does not strictly accord with all criteria of NPF4 Policy 13, it goes some way towards providing sustainable travel opportunities for customers and staff.

Condition 10 of planning permission in principle 18/01123/PPM requires "No development shall take place on the site unless and until site investigation and foul drainage modelling for the development has been carried out and a report detailing such investigation and modelling shall be submitted to and approved in advance in writing by the Planning Authority in consultation with the Scottish Environment Protection Agency (SEPA). Thereafter, the foul drainage for the site shall be carried out in accordance with the investigation and modelling strategy so approved. None of the holiday lodges hereby approved shall be brought into use or occupied unless and until the drainage of the site has been carried out in accordance with the investigation and strategy so approved.

Reason: To ensure adequate drainage of the development hereby approved in the interest of flood prevention, environmental protection and the long term amenity of the area."

A Wastewater Drainage Design report and Treated Sewage Effluent Discharge Permit (CAR/S/5006923) have been submitted with the application.

The **Council's Team Manager - Structures, Flooding and Streetlighting** raises no objection to the development the subject of this application and advises that the proposed wastewater drainage strategy would not increase flood risk at the site.

Scottish Environment Protection Agency (SEPA) confirm that a CAR licence for foul drainage associated with Phase 2 of the holiday lodge development was issued on 2nd May 2024, and therefore they raise no objection to the planning application.

Accordingly, the proposed and retrospective development would not and does not conflict with NPF4 Policy 22 and ELLDP Policies NH10 and NH11.

NPF4 Policy 12 encourages sustainable waste management. ELLDP Policy W3 is similarly worded. The applicant's agent has confirmed that each of the proposed and retrospective 22 holiday lodges would be provided with refuse/recycling containers, which would be emptied as part of a weekly collection under a private commercial contract. On this matter of the provision for waste management, the development the subject of this application does not conflict with NPF4 Policy 12 and ELLDP Policy W3.

The applicant's agent has confirmed that the proposed and retrospective 22 holiday lodges would be owned and operated under a central management system of operation by the multi-function leisure and tourism business of 'Whitekirk Hill Ltd'. On this matter, the proposed and retrospective development the subject of this current application accords with condition 17 of planning permission in principle 18/01123/PPM and with the planning obligation attached to that grant of planning permission in principle.

The **Council's Planning Obligations Officer** confirms that, as the application is for matters specified in conditions for 22 of the 41 holiday lodges approved by the grant of planning permission in principle 18/01123/PPM, it accords with the control set within the planning obligation of planning permission in principle 18/01123/PPM that the buildings only be used for holiday accommodation.

The Planning Obligations Officer further advises that the site lies out with any Strategic Transport intervention contribution zone of the ELLDP's Supplementary Guidance on Developer Contributions Framework, and therefore that no contribution is being sought towards strategic transport interventions. The Council's Road Services confirm that no contribution is sought towards local transport interventions.

Accordingly, the development the subject of this application does not conflict with ELLDP Policy DEL1.

Each of the proposed and retrospective 22 holiday lodges would and do comprise accommodation capable of being occupied as permanent independent residential accommodation. The occupation of them is restricted by condition 18 of planning permission in principle 18/01123/PPM to being solely for short term lets of not more than 28 days and each holiday lodge should not be re-let to the party who last occupied it anytime within a period of two months after that previous time of occupancy. Such control prevents their occupancy as permanent independent residential accommodation. This control of planning permission in principle 18/01123/PPM remains relevant and in place for the 22 holiday accommodation lodges the subject of this current application.

The proposed and retrospective development the subject of this application is for holiday accommodation lodges. In the supporting documents, the applicant's agent confirms that the business operation of 'Whitekirk Hill' employs 42 (forty-two) full-time equivalent jobs across a range of roles including housekeeping, maintenance, food and beverage, the spa/gym and play-barn. He further states that the proposed and retrospective development the subject of this current application would require an additional 6 (six) staff as part of the housekeeping/booking/management teams and a further 15 (fifteen) full-time equivalent jobs across the whole of the 'Whitekirk Hill' operation through longer opening hours for the café and play-barn. It is further stated that the existing 42 full time equivalent staff are taken from a local workforce, which indirectly contributes to the East Lothian economy. Information has also been provided to show that 'Whitekirk Hill' uses a range of local suppliers.

The **Council's Service Manager for Economic Development, Tourism, Business Gateway and Regeneration** advises that demand for non-service accommodation continues to increase in East Lothian alongside a plateauing of demand for serviced accommodation, and that changes to legislation for short-term let accommodation will materially reduce the provision of non-serviced accommodation in the County and is likely to preclude any significant growth within towns and villages.

The Service Manager for Economic Development further advises that in line with the assessment for planning permission in principle 18/01123/PPM, if priced correctly, well-designed and marketed, the 22 proposed and retrospective holiday lodges the subject of this application would be and are likely to be viable and to make a material contribution to the local economy. They would increase the availability of short-term let/non serviced holiday accommodation within the area and would contribute to further job creation and local economic benefit.

The Service Manager for Economic Development further comments that the Local Economy Strategy highlights the Council's continued commitment to the development of the tourism sector in East Lothian, and that the expansion of the current offer at 'Whitekirk Hill' will support this aim.

Such economic benefits reflect the considerations in the assessment of planning permission in principle 18/01123/PPM and are a material consideration in the assessment of this application for matters specified in conditions. On balance the economic benefits attributable to the proposed and retrospective 22 holiday lodges are sufficient to outweigh the less than substantial localised visual impacts on the landscape setting of the site and this part of the Whitekirk and Balgone Outcrops Special Landscape Area.

At its meeting on Tuesday 27th August 2019 the Council approved a motion declaring a Climate Emergency. Thereafter, at its meeting on Tuesday 3rd September 2019 the Council's Planning Committee decided that a report on the actions to be taken to reduce the carbon emissions from the building and from the completed development should be required on relevant applications for planning permission.

Policies 1 and 2 of NPF4 encourage, promote and facilitate development that addresses the global climate emergency and nature crises and that minimise emissions and adapts to the current and future impacts of climate change.

Condition 19 of planning permission 18/01123/PPM requires the submission of such Carbon Emissions information prior to the commencement of development on the site.

The applicant has submitted an Energy Statement for the planning application. The

Statement explains that the development has been designed to incorporate several sustainability features to enhance overall environmental performance, energy efficiency and sustainability. The Statement explains that the development is designed to comply with Building Standards Technical Handbook - Section 6: Energy and that in order to minimise energy consumption and enhance energy efficiency, the lodges are designed with:

- High-performance building fabric - insulation, double glazed doors and windows, airtight construction techniques to reduce heat loss;
- Efficient heating systems - condensing boilers suitable for conversion to hydrogen;
- Low-energy LED lighting;
- Energy efficient appliances - A rated energy efficient appliances;
- Water-efficient sanitary goods - low flow fixtures and water efficient sanitary goods to reduce water consumption; and
- Heat recovery ventilation units.

On the matter of renewable energy technologies, it is stated that the development proposals do not include the implementation of specific renewable energy technologies. However, it is stated that 'Whitekirk Hill' is committed to continually evaluating and considering renewable energy options and the development remains flexible and can incorporate renewable technologies in the future.

The development does not propose to provide electric vehicle charging for any of the proposed and retrospective 22 holiday lodges. However, the applicant indicates that the development remains flexible to incorporating renewable energy technologies in the future. Furthermore, there are existing electric car charging points located at the main car park for the leisure facility building at Whitekirk Hill.

Notwithstanding this, and although the development is in part retrospective, it would be prudent for the Planning Authority to seek to secure electric vehicle charging provision in line with the Council's Road Services standards, which for holiday accommodation would be 10% provision of charging points to parking spaces and a further 40% with passive provision which could be activated in future without further groundworks. In light of the rural setting of the proposed and retrospective holiday lodges, such electric vehicle charging units would require to be appropriately designed and modest in size and scale and appropriate to their rural location in order to ensure that such development would not have a detrimental impact on the landscape character and appearance of the area and of this part of the Whitekirk and Balgone Outcrops Special Landscape Area. The requirement for such electric vehicle charging provision could be secured through a condition attached to a grant of planning permission.

The effective measures required to reduce carbon emissions will be secured through the subsequent building warrant process. Subject to the aforementioned planning control to secure electric vehicle parking, the proposed and retrospective development would not be contrary to ELLDP Policy SEH2.

As development that, subject to planning controls, does not conflict with NPF4 Policy 3, and with the Council's considerations of carbon emissions reduction, the proposed and retrospective 22 holiday lodge development therefore would not and does not conflict with NPF4 Policies 1 and 2.

Scottish Water has been consulted on the application and raises no objection to the proposed and retrospective development for which approval of matters specified in conditions is sought.

If the gravel surface finish of the parking areas of the 6no. large 3-bed holiday lodges on

the eastern part of the site is not retrospectively removed and its replacement with reinforced grass surface finish has not been undertaken within 3 months of the date of this grant of planning permission, the decision also is that planning enforcement action will be taken to secure the removal of the unauthorised gravel surface finish of the parking areas, with the period for compliance with the enforcement notice being one month.

## CONCLUSION

The proposed development is consistent with the current development plan. The proposed development would also be consistent with the policies of NPF4. There are no other material considerations which outweigh its accordance with the Development Plan. NPF4 raises no additional material considerations in relation to this application.

It is recommended that planning permission be granted subject to the following conditions:

- 1 No development shall take place on site unless and until final site setting out details have been submitted to and approved by the Planning Authority.

The above mentioned details shall include a final site setting-out drawing to a scale of not less than 1:200, giving:

- a. the position within the application site of all elements of the proposed development and position of adjoining land and buildings;
- b. finished ground and floor levels of the development relative to existing ground levels of the site and of adjoining land and building(s). The levels shall be shown in relation to an Ordnance Bench Mark or Temporary Bench Mark from which the Planning Authority can take measurements and shall be shown on the drawing; and
- c. the ridge height of the proposed shown in relation to the finished ground and floor levels on the site.

Reason:

To enable the Planning Authority to control the development of the site in the interests of the amenity of the area.

- 2 Prior to the erection of the four eastern most small (micro) holiday lodges hereby approved, a suitable Geo-Environmental Assessment shall be carried out, with the Report(s) being made available to the Planning Authority for approval. The Geo-Environmental Assessment shall include details of the following:

- Phase II Ground Investigation (only if the Desk Study has determined that further assessment is required), comprising the following:
  - A survey of the extent, scale and nature of contamination, and reporting on the appropriate risk assessment(s) carried out with regards to Human Health, the Water Environment and Ground Gas (including Radon) as well as an updated conceptual model of the site;
  - An appraisal of the remediation methods available and proposal of the preferred option(s).

The Desk Study and Ground Investigation shall be undertaken by suitably qualified, experienced and competent persons and shall be conducted in accordance with the relevant guidance and procedures.

If it is concluded by the Reporting that remediation of the site is not required, then Parts 2 and 3 of this Condition can be disregarded.

Part 2:

Prior to the erection of the four eastern most small (micro) holiday lodges hereby approved (and where risks have been identified), a detailed Remediation Statement shall be

produced that shows how the site is to be brought to a condition suitable for the intended use by the removal of unacceptable risks to all relevant and statutory receptors. The Statement shall detail all works to be undertaken, proposed remediation objectives and remediation criteria as well as details of the procedures to be followed for the verification of the remedial works. It shall also ensure that the site will not qualify as contaminated land under Part2A of the Environmental Protection Act 1990 in relation to the intended use of the land following development. The Statement shall be submitted for the prior approval in writing of the Planning Authority.

Part 3:

The approved Remediation Statement shall be carried out in accordance with its terms prior to the erection of the four eastern most small (micro) holiday lodges hereby approved other than that required to carry out the agreed remediation. Following completion of the measures identified in the approved Remediation Statement, a Validation Report shall be submitted that demonstrates the effectiveness of the remediation carried out. The Validation Report shall be submitted for the prior approval in writing of the Planning Authority prior to the commencement of use of the four eastern most small (micro) holiday lodges.

Part 4:

In the event that 'unexpected' ground conditions (contamination) are encountered at any time when carrying out the development hereby approved, work on site shall cease and the issue shall be reported to the Planning Authority immediately. At this stage a Site Investigation and subsequent Risk Assessment may have to be carried out, if requested by the Planning Authority. It may also be necessary to submit a Remediation Strategy should the reporting determine that remedial measures are required. It should also be noted that a Verification Report would also need to be submitted confirming the satisfactory completion of these remedial works.

If no 'unexpected' ground conditions are encountered during the development works, then this should be confirmed to the Planning Authority prior to the use of the new development.

Reason:

To ensure that the site is clear of contamination prior to the occupation of the holiday lodges.

- 3 No development shall be carried out on the application site during the breeding bird season (March to August), unless in strict compliance with a Species Protection Plan for breeding birds that shall be submitted to and approved in advance in writing by the Planning Authority within one month of the date of this grant of planning permission, and thereafter the development shall be carried out in accordance with that Species Protection Plan for breeding birds so approved.

Reason:

To ensure the protection of wildlife and biodiversity from significant disturbance arising from the development hereby approved.

- 4 Within one month from the grant of planning permission, the applicant and/or developer shall provide evidence that a person who, through relevant education, training and experience, gained recognised qualifications and expertise in the field of trees in relation to construction, has been employed by the applicant/developer to monitor any works in close proximity of trees on and adjacent to the site and to monitor the trees of the eastern edge of the Whitekirk Covert woodland. If any tree is damaged and or dies as a result of unauthorised incursions into the root protection area of trees shown to be retained on site, including along the eastern edge of the Whitekirk Covert woodland, replacement planting will be required and details of such replacement tree planting shall be submitted to and approved in advance in writing prior to being undertaken and shall thereafter be carried out in accordance with the planting details so approved.

Reason:



In the interests of safeguarding the landscape character of the area and of the Whitekirk and Balgone Outcrops Special Landscape Area.

- 5 The access road hereby approved to serve as vehicular access to the 22 holiday lodges hereby approved shall be no wider than 3.7 metres and shall include provision for passing places in accordance with the details of such passing places to be submitted to and approved in advance in writing by the Planning Authority prior to their formation.

Within three months of the date of this grant of planning permission, a sample of the gravel surface finish to be used for the upper surface of the access road shall be submitted to and approved in writing in advance by the Planning Authority prior to its use in the development hereby approved.

Thereafter, the access road, passing places and turning areas shall be formed and constructed in accordance with the details, including surface finish sample, so approved.

Reason:

To enable the Planning Authority to control the appearance, materials and finishes to be used to achieve a development of good quality and appearance in the interests of the landscape character and amenity of the area, and the landscape character of the Whitekirk and Balgone Outcrops Special Landscape Area and the setting of the Whitekirk Conservation Area.

- 6 Within three months of the dates of this grant of planning permission for matters specified in conditions, details of electric vehicle charging provision for the development shall be submitted to and approved in advance in writing by the Planning Authority. The electric vehicle charging provision shall include a minimum of 10% electric vehicle charging of the parking spaces, and a further 40% electric vehicle charging provision that could be activated in future without further groundworks, and shall provide details of the electric vehicle charging units, their positions and a timescale for implementation.

Thereafter, the electric vehicle charging provision shall be implemented in accordance with the details and timescale so approved unless otherwise approved by the Planning Authority.

Reason:

To minimise the environmental impact of the development.

- 7 Within two months of the date of this grant of planning permission details, including scale drawings, of the timber decks and entrance steps of the 12 large 3-bed holiday lodges hereby approved shall be submitted to and approved in advance in writing by the Planning Authority and thereafter the timber decks and entrance steps of those 12 lodges shall accord with the details so approved.

Reason:

To enable the Planning Authority to control the appearance, materials and finishes to be used to achieve a development of good quality and appearance in the interests of the landscape character and amenity of the area, and the landscape character of the Whitekirk and Balgone Outcrops Special Landscape Area and the setting of the Whitekirk Conservation Area.

- 8 Within one month of the date of this grant of matters specified in conditions and notwithstanding the content of the Biodiversity Enhancement Plan - revision A (dated January 2024), details of the measures to be implemented to conserve, protect, restore and enhance biodiversity on the application site shall be submitted to and approved by the Planning Authority. The measures shall include but not exclusively, additional tree and scrub planting, invasive species removal (if relevant), grassland restoration/wildflower meadow management, and additional hedgehog habitat box(es), and shall demonstrate net positive effects for biodiversity are achieved on the site. The Biodiversity Enhancement Plan will include timescales for implementation and management schedules for all

biodiversity enhancement measures, including but not exclusively, annual inspections of habitat boxes.

Thereafter, the measures, as so approved, shall be implemented within twelve months of the date of this grant of planning permission and shall thereafter be retained and maintained in accordance with the implementation and management schedules, unless otherwise approved in writing by the Planning Authority.

Reason:

In the interests of protecting and enhancing biodiversity on the site and within the surrounding area.

- 9 The trees on the eastern and southeast part of the Whitekirk Covert Woodland, commensurate with the application site that have a root protection area overlapping with any of the 22 holiday lodges hereby approved shall be monitored by the arborist employed by the applicant/developer as required by condition 4 of this grant of planning permission. Such monitoring shall be undertaken annually for a period of ten years and in the event that any of the trees on the eastern part of the Whitekirk Covert Woodland that have a root protection area overlapping with any of the holiday lodges hereby approved dies, becomes seriously damaged or diseased, a replacement tree(s) shall be planted with details of the position(s), species and size of such replacement tree planting being submitted to and approved in writing in advance by the Planning Authority. Any replacement tree(s) shall be maintained wind firm and weed free until established. Thereafter, the replacement tree(s) planted shall accord with the details so approved.

Any such replacement tree(s) shall be planted in the first planting and seeding season (October - March) following the failure and removal of any existing tree of the eastern part of the Whitekirk Covert Woodland.

Within three months of the date of this grant of matters specified in conditions, an annual monitoring report shall be submitted to and approved in writing by the Planning Authority, and thereafter, and for the period of ten years referred to above in this condition, a monitoring report shall be submitted annually for the prior approval in writing by the Planning Authority.

Reason:

To ensure the retention of vegetation important to the landscape character of the area and of the Whitekirk and Balgone Outcrops Special Landscape Area and the setting of the Whitekirk Conservation Area.

- 10 Notwithstanding the details shown on drawing no. 2077/11 Rev E (Planting Plan), within one month of the date of this grant of matters specified in conditions, details of an amended scheme of landscaping for the site shall be submitted to and approved in writing by the Planning Authority. The amended landscaping scheme shall include, but not exclusively, additional small species native trees within areas of gorse planting on the northern part of the western plateau of the site that shall be in addition to that already detailed on drawing no. 2077/11 Rev E (Planting Plan). The amended landscaping planting scheme shall include details for its implementation and maintenance thereafter.

Thereafter, all planting of the amended landscape planting scheme shall be carried out in accordance with the approved details for implementation and in any event no later than the first planting season following the commencement of use of any part of the development hereby approved. Any trees or plants which die, are removed or become seriously damaged or diseased within 10 years shall be replaced in the next planting season with others of similar species and final size, unless the Planning Authority gives written consent to any variation.

No trees, detailed in the docketed drawings to be retained on the site, shall be damaged or uprooted, felled, topped, lopped or interfered with in any manner without the previous

written consent of the Planning Authority.

Reason:

In order to ensure the implementation of a landscaping scheme to enhance the appearance of the development in the interests of the amenity of the area and the landscape character of the Whitekirk and Balgone Outcrops Special Landscape Area and the setting of the Whitekirk Conservation Area.

- 11 Within three months of the date of this grant of matters specified in conditions, the gravel surfacing of the parking areas of the six holiday lodges on the eastern part of the site shall be removed and all of the parking areas and footpaths identified on docketed drawing no. 2077/20 rev D to be a reinforced grass surface finish shall be finished with such reinforced grass materials. Thereafter, the reinforced grass surface finish of the parking areas of all of the twenty-two holiday lodges and the footpaths as detailed on docketed drawing no. 2077/20 rev D shall be retained and maintained unless approved by the Planning Authority.

Reason:

To enable the Planning Authority to control the appearance, materials and finishes to be used to achieve a development of good quality and appearance in the interests of the landscape character and amenity of the area, and the landscape character of the Whitekirk and Balgone Outcrops Special Landscape Area and the setting of the Whitekirk Conservation Area.

- 12 The external parts of the heat recovery units to be installed on the holiday lodges hereby approved shall be coloured to match as closely as possible the part of the external wall of the holiday lodge to which they would adjoin.

Reason:

To enable the Planning Authority to control the appearance, materials and finishes to be used to achieve a development of good quality and appearance in the interests of the landscape character and amenity of the area, and the landscape character of the Whitekirk and Balgone Outcrops Special Landscape Area and the setting of the Whitekirk Conservation Area.

- 13 The roof flues and wall vents of the 22 holiday lodges hereby approved shall be coloured to match as closely as possible the part of the roof or wall of the holiday lodges into which they are to be installed, unless otherwise approved in writing in advance by the Planning Authority.

Reason:

To enable the Planning Authority to control the appearance, materials and finishes to be used to achieve a development of good quality and appearance in the interests of the landscape character and amenity of the area, and the landscape character of the Whitekirk and Balgone Outcrops Special Landscape Area and the setting of the Whitekirk Conservation Area.

- 14 Within one month of the date of this grant of planning permission for matters specified in conditions, details of: (i) any external lighting for the holiday accommodation units hereby approved, including any lighting of any terraces or open timber deck of the large 3-bed lodges, (ii) any self-timers within the holiday lodge buildings to ensure lighting is not in use when not required, and (iii) any external lighting bollards for the roads, paths and parking areas shall be submitted to and approved in writing by the Planning Authority. All external lighting shall be wildlife friendly lighting. Such details of the external lighting and any drawings of such external lighting shall be accompanied by light spill calculations relating to such lighting and drawings.

There shall be no external lighting of the timber decks of the 10 small (micro) lodges hereby approved.

Thereafter the external lighting, self-timers and external lighting bollards installed at each

of the 22 holiday lodges hereby approved and for the roads, paths and parking areas shall accord with the details so approved.

Reason:

To enable the Planning Authority to control the appearance, materials and finishes to be used to achieve a development of good quality and appearance in the interests of the landscape character and amenity of the area, and the landscape character of the Whitekirk and Balgone Outcrops Special Landscape Area and the setting of the Whitekirk Conservation Area and to minimise impacts on biodiversity.

- 15 Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992, as amended by The Town and Country Planning (General Permitted Development) (Scotland) Amendment Order 2011, or any subsequent Order amending, revoking or re-enacting that Order, no development of the types specified in Class 9 of Part 2 of Schedule 1 of the Order or in any statutory instrument revoking and/or re-enacting those Parts of the Order shall be undertaken on the 22 holiday lodges without the prior approval of the Planning Authority.

Reason:

To enable the Planning Authority to control the appearance, materials and finishes to be used to achieve a development of good quality and appearance in the interests of the landscape character and amenity of the area, and the landscape character of the Whitekirk and Balgone Outcrops Special Landscape Area and the setting of the Whitekirk Conservation Area.

- 16 In the event that the 22 holiday accommodation lodges hereby approved fails to be let as a holiday let for a continuous period of six months, then, unless otherwise approved in writing by the Planning Authority, they shall be deemed to have ceased to be required. If they are deemed to have ceased to be required, they and all associated structures shall be removed from the site by the operator by no later than the date occurring 6 months after the end of the said continuous six months period, and the ground fully reinstated to the specification and approval of the Planning Authority.

Reason:

To prevent redundant buildings and associated development remaining on the application site, in the interests of the landscape amenity of the area including of the Whitekirk and Balgone Outcrops Special Landscape Area.

- 17 The 22 holiday lodges hereby approved shall be positioned in accordance with the positions shown for them on docketed drawing no. 2077/20 rev D unless otherwise approved by the Planning Authority.

Reason:

In the interests of the landscape character and amenity of the area, and the landscape character of the Whitekirk and Balgone Outcrops Special Landscape Area and the setting of the Whitekirk Conservation Area.