

## Background Paper

### Issue No 008

## Natural Environment

**Context: NPF4 Policy 1 Tackling the climate and nature crisis, Policy 3 Biodiversity, Policy 4 Natural Places, Policy 6 Forestry Woodland and Tree, Policy 20 Blue and Green Infrastructure and Policy 32 Aquaculture**

This section covers the Natural Environment, including Nature Crisis, Biodiversity including Geodiversity, Natural Places, Soils, Forestry Woodland and Trees; Blue and Green Infrastructure and Aquaculture. Flooding is covered in the Spatial Strategy and the Strategic Flood Risk Assessment.

## LINKS TO EVIDENCE

## Nature Emergency: NPF Policy 1 Tackling the Climate and Nature Crisis, Policy 3 Biodiversity and Policy 4 Natural Places

ELC 236	SEPA Scottish Wetlands Inventory <a href="https://map.environment.gov.scot/sewebmap/?layers=scotWetlandInven">https://map.environment.gov.scot/sewebmap/?layers=scotWetlandInven</a>
ELC 237a	CSGN habitat mapping <a href="#">Central Scotland Green Network (CSGN) - Habitat Connectivity Map Guides   NatureScot</a>
ELC 237b	State of Nature Report, State of Nature Partnership - <a href="https://stateofnature.org.uk/">https://stateofnature.org.uk/</a>
ELC 237c	East Lothian Council Biodiversity Duty Report 2021-23 <a href="https://www.eastlothian.gov.uk/downloads/file/33829/east-lothian-council-biodiversity-duty-report-2021-2023">https://www.eastlothian.gov.uk/downloads/file/33829/east-lothian-council-biodiversity-duty-report-2021-2023</a>
ELC 237d	Habitat (for woodland also see Policy 6 below) European Nature Information System (EUNIS) Habitat Map of Scotland <a href="https://www.environment.gov.scot/our-environment/habitats-and-species/habitat-map-of-scotland/">https://www.environment.gov.scot/our-environment/habitats-and-species/habitat-map-of-scotland/</a> East Lothian's Coastal Change Adaptation Plan (forthcoming) Nature Networks CivTech NatureScot Nature Networks and Optimisation mapping (forthcoming)
ELC 238	Buglife B-lines <a href="https://www.buglife.org.uk/our-work/b-lines/">https://www.buglife.org.uk/our-work/b-lines/</a>
ELC 239	Edinburgh City Council Nature Network maps <a href="https://storymaps.arcgis.com/collections/9e57bb4b3d4c443889392b725ad2ae46?item=5">https://storymaps.arcgis.com/collections/9e57bb4b3d4c443889392b725ad2ae46?item=5</a>
ELC 033	SEPA Environmental Data <a href="https://www.sepa.org.uk/environment/environmental-data/">https://www.sepa.org.uk/environment/environmental-data/</a> in particular: <ul style="list-style-type: none"> <li>• Recommended riparian river bank corridor layer</li> <li>• Geomorphic risk layer</li> <li>• Riparian vegetation planting opportunities</li> <li>• Flood Hazard Maps</li> <li>• Scottish Wetland Inventory layer</li> <li>• Obstacles to fish migration</li> <li>• Water Environment Fund Projects</li> <li>• Water environment classification</li> <li>• Natural Flood Management maps</li> </ul> <p><b>Species</b></p>
ELC 240b	British Trust for Ornithology Birds of Conservation Concern 5 - <a href="https://www.bto.org/our-science/publications/birds-conservation-concern">https://www.bto.org/our-science/publications/birds-conservation-concern</a>
ELC 240c	British Trust for Ornithology Wetland Bird Survey (WeBS) data <a href="https://www.bto.org/our-science/projects/wetland-bird-survey/data">https://www.bto.org/our-science/projects/wetland-bird-survey/data</a>
ELC 241	British Trust for Ornithology Wader Sensitivity Mapping <a href="https://app.bto.org/wader-map/index.jsp">https://app.bto.org/wader-map/index.jsp</a> East Lothian Council Goose Records

ELC 242a	Species and habitat records from The Wildlife Information Centre <a href="https://www.wildlifeinformation.co.uk/">https://www.wildlifeinformation.co.uk/</a> , the biological record centre for the Lothians
ELC 242b	Botanical Society of the British Isles (BSBI) Plant Atlas 2020 <a href="https://bsbi.org/plant-atlas-2020">https://bsbi.org/plant-atlas-2020</a>
ELC 243	Internationally and nationally designated sites and information Inventory Gardens and Designed Landscapes – Information from Historic Environment Scotland <a href="https://www.historicenvironment.scot/advice-and-support/listing-scheduling-and-designations/gardens-and-designed-landscapes/">https://www.historicenvironment.scot/advice-and-support/listing-scheduling-and-designations/gardens-and-designed-landscapes/</a>
ELC 244	<a href="#">NatureScot’s Landscape Character Assessment in Scotland</a>
	<b>Local Sites</b>
	<b>Local Biodiversity Sites –</b>
ELC 322 *	East Lothian’s Biodiversity Technical Note <a href="#">10</a> to LDP1, Planning for Biodiversity)(East Lothian Council) <a href="https://www.eastlothian.gov.uk/downloads/file/27787/technical_note_10_planning_for_biodiversity">https://www.eastlothian.gov.uk/downloads/file/27787/technical_note_10_planning_for_biodiversity</a>  Monitoring information on Local Biodiversity Sites (forthcoming)
	<b>Local Gardens and Designed Landscapes –</b> Character Statements produced by the Garden History Society (forthcoming)
	<b>Local Geodiversity Sites:</b>
ELC 323 a, b ,c *	<a href="#">East Lothian Council Technical Note 11 Planning for Geodiversity</a> (ELC)
ELC 247	<a href="#">East Lothian Geodiversity Audit</a> (British Geological Society)
	<b>Special Landscape Areas</b>
ELC 108 a, b, c *	East Lothian Council’s Special Landscape Area Supplementary Planning Guidance <a href="https://www.eastlothian.gov.uk/info/210547/planning_and_building_standards/12284/natural_environment_and_planning/2">https://www.eastlothian.gov.uk/info/210547/planning_and_building_standards/12284/natural_environment_and_planning/2</a>
	<b>Under-used Land</b>
ELC 249	Buildings at Risk Register <a href="https://buildingsatrisk.org.uk/search/planning_authority/195">https://buildingsatrisk.org.uk/search/planning_authority/195</a>
ELC 250a	Framework for Nature Networks in Scotland (in draft) (NatureScot)
ELC 250b	Scottish Vacant and Derelict Land Register <a href="#">Scottish Vacant and Derelict Land Survey - site register - gov.scot (www.gov.scot)</a>
ELC 251	East Lothian’s Green Network Strategy (Nature Networks) <a href="https://www.eastlothian.gov.uk/downloads/file/30113/green_network_strategy_spg">https://www.eastlothian.gov.uk/downloads/file/30113/green_network_strategy_spg</a>
ELC 252	Native Woodland Survey of Scotland (East Lothian) <a href="https://forestry.gov.scot/forests-environment/biodiversity/native-woodlands/native-woodland-survey-of-scotland-nwss">https://forestry.gov.scot/forests-environment/biodiversity/native-woodlands/native-woodland-survey-of-scotland-nwss</a>

ELC 253	Ancient Woodland Inventory <a href="https://www.data.gov.uk/dataset/c2f57ed9-5601-4864-af5f-a6e73e977f54/ancient-woodland-inventory-scotland">https://www.data.gov.uk/dataset/c2f57ed9-5601-4864-af5f-a6e73e977f54/ancient-woodland-inventory-scotland</a>
ELC 254	Native Woodland of Scotland <a href="https://forestry.gov.scot/forests-environment/biodiversity/native-woodlands/native-woodland-survey-of-scotland-nwss">https://forestry.gov.scot/forests-environment/biodiversity/native-woodlands/native-woodland-survey-of-scotland-nwss</a>
ELC 255	Central Scotland Green Network Delivery Plan 2030 <a href="https://centralscotlandgreennetwork.org/what-we-do/">https://centralscotlandgreennetwork.org/what-we-do/</a>
ELC 256	Core Paths maps ( <a href="https://www.eastlothian.gov.uk/info/210569/countryside_and_wildlife/12044/core_paths">https://www.eastlothian.gov.uk/info/210569/countryside_and_wildlife/12044/core_paths</a> )
ELC 106 *	East Lothian's Green Network Strategy SPG
ELC 258	East Lothian's Nature Networks in Parks and Greenspaces Action Plan
ELC 259	SEPA Water quality maps – rivers, bathing waters, groundwater <a href="https://informatics.sepa.org.uk/RBMP3/">https://informatics.sepa.org.uk/RBMP3/</a>
ELC 109 *	Sustainable Urban Drainage SPG <a href="https://www.eastlothian.gov.uk/downloads/file/28559/suds_spg">https://www.eastlothian.gov.uk/downloads/file/28559/suds_spg</a>
ELC 261	SEPA guidance on SUDS - <a href="https://www.sepa.org.uk/regulations/water/diffuse-pollution/diffuse-pollution-in-the-urban-environment/">https://www.sepa.org.uk/regulations/water/diffuse-pollution/diffuse-pollution-in-the-urban-environment/</a>
ELC 262	Scottish Water Sewers for Scotland, 4th edition, available to download from: <a href="https://www.scottishwater.co.uk/Business-and-Developers/NEW-Connecting-to-Our-Network/Developing-housing-and-commercial-properties/Applying/Waste-Water-Connection-Technical-Standards">https://www.scottishwater.co.uk/Business-and-Developers/NEW-Connecting-to-Our-Network/Developing-housing-and-commercial-properties/Applying/Waste-Water-Connection-Technical-Standards</a>

## SUMMARY OF EVIDENCE

### Nature Crisis (NPF Policies 1, 3 and 4)

East Lothian has a long history of land use change and biodiversity loss resulting from human efforts to control the land to provide for our needs for homes, food, materials, goods, energy and transport. This historic (and continuing) land use change has led to loss of species and habitat, and loss of habitat connectivity. Early agricultural enclosure brought removal of woodland as well as drainage of the land for agricultural production, which has gradually intensified. Built development and related recreational pressures in the area have had (and will continue to have) direct and indirect effects on both species and habitat.

Despite this, there remain areas of biodiversity value, both designated and undesignated. The Firth of Forth hosts internationally important populations of waders and seabirds, recognised through designation as Ramsar Site, Special Protection Areas and SSSI. Some of the features of these sites are not in favourable condition. There are further SSSIs inland, designated for both biodiversity and geodiversity interest. Again, not all of the features of these sites are in favourable condition. Local Development Plan 1 also protected Geological Conservation Review Sites. Sites have been designated locally to protect biodiversity, geodiversity and local landscapes. Designations include Local Biodiversity Sites, Local Geodiversity Sites and Special Landscape Areas. A monitoring methodology has been created to check the condition of Local Biodiversity Sites and these will be checked. Local Development Plan 1 also included protection for the Local Nature Reserve and Country Park. The protection of designated sites is part of the LDP2 site assessment methodology.

Within the context of NPF policy it will be the job of the LDP to ensure that development contributes to biodiversity enhancement either off site or on site.

### Forestry, Woodland and Trees (NPF4 Policy 6)

East Lothian has experienced historic declines of woodland coverage, and although this was reversing the last decade has again seen a slight decline. Woodland coverage is lower than the Scottish average. Only a small proportion of our woodland is ancient woodland. The protection of ancient woodland will be a key consideration in the site assessment methodology.

The recently adopted Tree and Woodland Strategy for East Lothian contains targets for increasing woodland and improving woodland connectivity. This is in line with the Scottish Government's ambition to increase woodland cover.

### Blue Green Infrastructure (NPF Policy 20)

The Central Scotland Green Network is a national development which includes East Lothian. The East Lothian Green Network Strategy set out how it will be implemented here. The Tree and Woodland Strategy for East Lothian also includes actions in support of this. NPF4 requires blue green infrastructure and networks to be identified. There are a wide range of assets that could be included in this in East Lothian. Work to identify the network at a detailed level will be carried out as part of the development of LDP2.

The Open Space Audit is in the process of being updated. The previous audit found that in terms of quantity, all clusters except Tranent met the standard. All settlements met the quality standard for parks. A Play Sufficiency Assessment has been carried out to inform the Evidence Report. The Core Path Plan is a key element of the green network. There are 331 km of Core Paths. Greening vacant and derelict land was a core aim of the Central Scotland Green Network. East Lothian has a similar proportion of Vacant and Derelict land to Scotland as a whole, with the former Cockenzie Power Station site being the largest site.

Riparian areas are important for recreation as well as Nature Networks. Many rivers have poor water quality. The Tree and Woodland Strategy aims to improve this with riparian planting.

### Aquaculture (NPF4 Policy 32)

East Lothian does not have a very large aquaculture industry. No Controlled Activities Licences or Crown Estate Scotland lease agreements have been issued with respect to aquaculture here. There are no Shellfish Protected Areas. The nearest Disease Management areas for infections Salmon Anaemia is Area 21. This is in Berwickshire around the coast north of Eyemouth and south to Burnmouth, some 9 km east of East Lothian.

## SUMMARY OF STAKEHOLDER CONSULTATION

## Nature Crisis (NPF Policy 1, 3 and 4)

Both adults and children and young people were concerned about the nature crisis. Some adult respondents recognised that many parts of East Lothian are degraded in terms of nature, and declining. There were calls for the LDP to address this by identifying areas where environmental protection and improvement should occur, with a landscape scale approach.

Some respondents considered addressing the nature crisis should include urban areas. Some called for restriction of development to avoid harm to nature, others for design standards for housing that support biodiversity. Primary school children cared about nature and made the link with the climate emergency.

Consultation with secondary school children using the Place Standard suggests that some areas have better natural spaces than others, with the North Berwick High School catchment scoring most highly, and Ross High catchment (which includes Tranent) and Knox Academy (Haddington) scoring lowest. The Fa'side Area Partnership area, which covers Tranent, scored lowest in the public consultation on the Place Standard also, though diverging from the secondary school children's consultation, Haddington scored highest, followed by North Berwick.

Access to natural places was also seen as important. The consultation of both primary and secondary school children found that easy access to natural areas was very important to them. However, some people also raised the issue of over-use of natural areas for recreation and the need for management.

For the next LDP what was important to children was to protect natural areas, parks and green spaces; create diverse habitats; plant more trees and flowers; and develop safe access to natural areas and greenspaces. Children recognise that a more natural environment could improve health and well-being and help combat climate change.

## Forestry, Woodland and Trees (NPF4 Policy 6)

General issues were raised with regard to increasing tree cover and protection of existing trees, as well as issues in relation to specific trees. Several respondents noted link between trees and climate change, and trees and health.

Comments were made seeking retention of existing trees, hedges and woodlands. This included that existing green spaces, woodland, woodland habitat and hedgerows should be protected and retained in general, that trees and hedgerows, in particular mature trees should not be cut down.

## Blue Green Infrastructure (NPF Policy 20)

\*Issues of water supply as a resource are covered under 'Infrastructure'.

Several respondents mentioned the proposed Musselburgh Flood Protection Scheme, mostly in support of nature-based solutions. There was support for nature-based solutions to flooding generally. There were a few comments on water quality particularly in relation to discharges to the sea around North Berwick. There were also calls for creation of wetland areas. Some respondents also commented on grey water and water scarcity.

Through the Place Standard, scores were given for 'Natural Space'. The Haddington area had the highest average score, with Fa'side (including Tranent) and Preston Seton Gosford (which includes Prestonpans) the lowest. Both of these areas include some of the areas of highest deprivation in East Lothian. Many suggestions were given for potential improvements in general, including to active travel paths, open spaces (including management), to biodiversity in different types of area, to outside sports facilities and others. Maintenance was also raised as an issue. For 'Play and Recreation' North Berwick had the highest Place Standard score, with Preston Seton Gosford and Fa'side the lowest.

Those attending public events made numerous suggestions for improvements, including to cycle and walking routes, for more green space and for food growing.

In the engagement with Primary School children, it was found that frequent access to natural spaces was important to children. Independence to meet friends and go to places to play, hang out and take part in sports was important. Children recognised the link between health and physical activity, including active travel. Natural or semi-natural areas, such as beaches and parks, were children's most frequent responses when asked 'what's special about where you live'.

Secondary school children through the Place Standard Engagement rated 'Nature – parks, woods, hills and beaches' very highly. Young people appreciated the access to nature they had in much of East Lothian. When asked what they liked about the place they lived, 'Good open spaces, parks and/or woodland' was the second top choice (after 'access to good bus/train routes'). Parks and open spaces were the second most popular choice for a 'hang out' spot also (after their own or a friend's house).

### Aquaculture (NPF4 Policy 32)

Very little comment was made about aquaculture, reflecting the limited size of this sector in East Lothian. Stakeholders, in particular children and young people, did put a high value on access to natural spaces including the coast.

**WHAT THIS MEANS FOR THE PROPOSED PLAN? WHAT ARE THE KEY ISSUES FOR THE LDP TO ADDRESS, FROM POLICY ANALYSIS?**

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## Nature Crisis (NPF Policies 1, 3 and 4)

Overall biodiversity loss is the key issue. The Spatial Strategy and site allocations will require to address this with regard to the mitigation hierarchy of avoid – reduce – restore – offset. There is a statutory requirement to avoid an adverse impact on the integrity of any European Site, and the strategy, policies and proposals of the LDP will require to meet this test. This may constrain some potential development locations.

The need to address biodiversity loss means the LDP will need to identify and protect Nature Networks. There may also be a need to protect more areas with existing biodiversity value to meet 30x30 targets. This is likely to be led through the Local Biodiversity Action Plan process.

Natural space is an important component of play for children. Children’s contact with nature is important as knowledge and love for nature supports conservation. The spaces used can be small. The Play Sufficiency Assessment found a need to increase natural play opportunities, ensuring accessibility and inclusion. The LDP should think about how to increase very local opportunities for children’s contact with nature.

## Forestry, Woodland and Trees (NPF4 Policy 6)

The LDP should take into account the Tree and Woodland Strategy for East Lothian and reflect and support the spatial elements. This includes retention of existing trees, woodland and hedges, especially those of high biodiversity value, and expansion and improved connectivity of woodland. The value of trees for climate issues, both to offset carbon emissions and to adapt to coming climatic conditions, is recognised.

NPF4, the Scottish Government’s Control of Woodland Removal Policy and the Tree and Woodland Strategy for East Lothian strongly support protection of existing woodland and trees, replacement where they cannot be retained, and enhancement of biodiversity which can include trees and woodlands. There is both a national and local ambition to increase woodland cover.

The LDP will need to consider any constraints that the desirability of protecting woodland and creating a woodland habitat network may place on the spatial strategy and site allocation. The LDP should also consider how it can support the aims of the Tree and Woodland Strategy for East Lothian to expand woodland coverage, increase access to woodland and increase canopy coverage in built up areas. The LDP should consider whether there is a need or opportunity to address:

- Recreational pressures on woodland of high biodiversity value
- Hutting and tourist accommodation such as ‘glamping’ in woodland
- Woodland removal for development, including renewable energy proposals and potential to identify locations for any compensatory planting required
- changing requirements for securing landscaping as climatic change alters species which can be grown/maintenance requirements
- How to encourage/ensure relevant proposals incorporate existing and new trees
- Encouraging use of trees in design to adapt and mitigate climate change
- Whether any changes to Conservation Area boundaries are needed to protect important trees

## Blue Green Infrastructure (NPF Policy 20)

The Central Scotland Green Network is a National Development, and the spatial strategy is required to link in with its aims and ambitions. The LDP will require to consider what interventions are needed to achieve this in East Lothian. Blue Green Infrastructure assets and networks will require to be identified and mapped. Mapping should include existing blue and green assets and potential enhancement.



Blue green infrastructure should be planned with the needs of children as well as adults and families in mind. This will mean considering blue green infrastructure at a sufficiently local scale.

There may be some areas that lack sufficient open space, either in terms of type, quantity or quality. This will be shown through the updated Open Space Strategy. The LDP should seek to address this.

Stakeholder consultation suggests there is uneven provision of natural spaces, with the Tranent area scoring low in both the public and secondary school Place Standard consultation. Preston-Seton-Gosford scored low in the public consultation and Haddington in the secondary school consultation. These western areas include some areas in the most deprived 20% of Scottish Index of Multiple Deprivation areas, while Haddington includes some areas in the most deprived 30%. This suggests that the focus of improvement should be on the western area, but that attention should also be given to the Haddington area. Changing demographics, with more older people and also perhaps more people in poor health may have implications for the type and location of open space and green/blue networks.

There may be opportunities to use site allocations to support the Blue Green Network and this should be considered both for the spatial strategy and the choice of specific sites.

### Aquaculture (NPF4 Policy 32)

There is little existing aquaculture in East Lothian. The Scottish Government restriction on fish farming on the East Coast means fish farming is not likely to emerge as an issue. The high value placed on the coast by stakeholders for other uses such as recreation should be borne in mind if there is a need to consider aquaculture on the coast.

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

## Nature Crisis NPF Policy 1 and Biodiversity Policy 3 Natural Places

No disputes but there were concerns raised by some in the development industry around the loss of housing site capacity to increased biodiversity requirements.

## Forestry, Woodland and Trees (NPF4 Policy 6)

No disputes.

## Blue Green Infrastructure (NPF Policy 20)

No disputes

## Aquaculture (NPF4 Policy 32)

No disputes

For all the topics there was agreement about the need to act to improve biodiversity and halt decline. Different approaches were recommended but they mainly focussed around the delivery of nature networks and the restoration of more traditional landscape patterns through hedgerow restoration and tree planting.

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## Introduction

1. The nature emergency is one of the most significant issues facing us as a society. Action needs to be urgent and wide-ranging. It is therefore recognised as a cross-cutting issue in National Planning Framework 4, and biodiversity issues are included in other topic areas as relevant.
2. Engagement to support preparation of the Evidence Report took place during April – October 2023. The main means of responding was via drop-in events, online forums, an online survey, and Place Standard survey, though comments could also be sent directly to Planning Service. Engagement was also carried out with children and young people in schools and through a Place Standard survey for young people.

## EVIDENCE

### Nature Crisis (NPF Policies 1, 3 and 4)

**NPF4 Policy 1**

LDPs must address the global climate emergency and nature crisis by ensuring the spatial strategy will reduce emissions and adapt to current and future risks of climate change by promoting nature recovery and restoration in the area.

**NPF4 Policy 3**

LDPs should protect, conserve, restore and enhance biodiversity in line with the mitigation hierarchy. They should also promote nature recovery and nature restoration across the development plan area, including by: facilitating the creation of nature networks and strengthening connections between them to support improved ecological connectivity; restoring degraded habitats or creating new habitats; and incorporating measures to increase biodiversity, including populations of priority species.

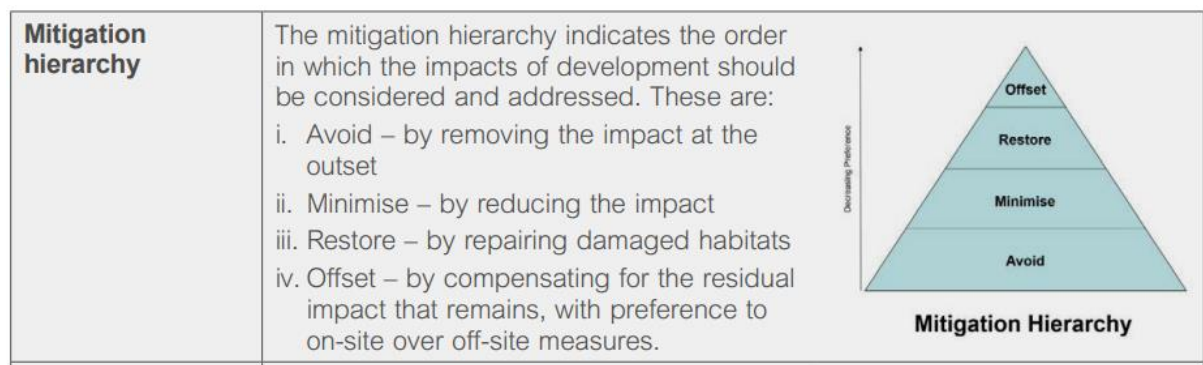


Figure 1 Mitigation heirarchy as shown in NPF4

3. Globally, nature is in crisis. According to the UN Environment Programme, one million of the world's estimated 8 million species of plants and animals are threatened with extinction. Human action has significantly altered three quarters of the Earth's land surface. Issues relating to biodiversity should be considered in this global context i.e. that biodiversity is under pressure and urgent action is required to improve the situation. The Intergovernmental Platform on Biodiversity and Ecosystem Services (IPBES) advises the United Nations on Biodiversity. The key message of their 'Global Assessment Report on Biodiversity and Ecosystem Services' (2019) was that nature and its vital contributions to people, are deteriorating worldwide. The IPBES Report advises that both direct and indirect drivers of change adversely impacting biodiversity have sped up in the last half century. Those with the most impact are, in descending order of harm: changes in land and sea use; direct exploitation of organisms; climate change; pollution; and invasion of alien species. The report also identified as indirect drivers the disconnect of people from nature and lack of value and importance placed on nature.
4. Trends in the UK reflect this bleak global picture. The State of Nature Report (2023) regards the UK as "of the most nature depleted countries on Earth". Despite its reputation for its natural environment, Scotland is no exception. The headline figures from this report are a 15% average decline in Scottish wildlife since 1994. A halving in distribution of flowering plants since 1970. A halving in Scottish Seabirds since 1986. And one in nine Scottish species threatened with extinction.
5. Not only has the abundance and distribution of Scotland's species declined but the trend appears to be accelerating. The report itself notes that its findings should be seen against a backdrop of profound historic influences on nature in Scotland, centuries of habitat loss, development and persecution.
6. Key pressures on biodiversity identified were; intensive use of land for agriculture and forestry, overgrazing, and fishing. The impacts are made worse by climate change, pollution, inappropriate development, invasive non-native species and disease. However, some species benefit, expanding their range with climatic change, or taking advantage of managed habitat.
7. These historic and current pressures are as relevant for East Lothian as for Scotland as a whole. East Lothian has a long history of land use change and biodiversity loss resulting from human efforts to control the land to provide for our needs for homes, food, materials, goods, energy and transport. This historic (and continuing) land use change has led to loss of species and habitat, and loss of habitat connectivity. Early agricultural enclosure brought removal of woodland as well as drainage of the land for agricultural production, which has gradually intensified. Built development and related recreational pressures in the area have had (and will continue to have) direct and indirect effects on both species and habitat.
8. East Lothian has been inhabited for thousands of years. As a result, many species have evolved to adapt to human intervention in the environment, such as a farmed landscape. A return to a completely natural environment would result in decline or loss of these species and is not possible given the need to meet human needs. However, biodiversity loss itself is a significant threat to human health and well-being and it is imperative that this is addressed along with the climate crisis. There are opportunities for biodiversity enhancement both alongside development and agricultural practices.

## Habitat

9. Habitat data across East Lothian as a whole is available on [Scotland's Environment Web – Habitat Map of Scotland](#) maps. This data derives from many different sources, and classified into EUNIS, the European Nature Information System. Previously, a Phase 1 survey was published for

the Lothians in 1997 but has not been repeated since. The broad habitat types from this Phase 1 survey are shown below.

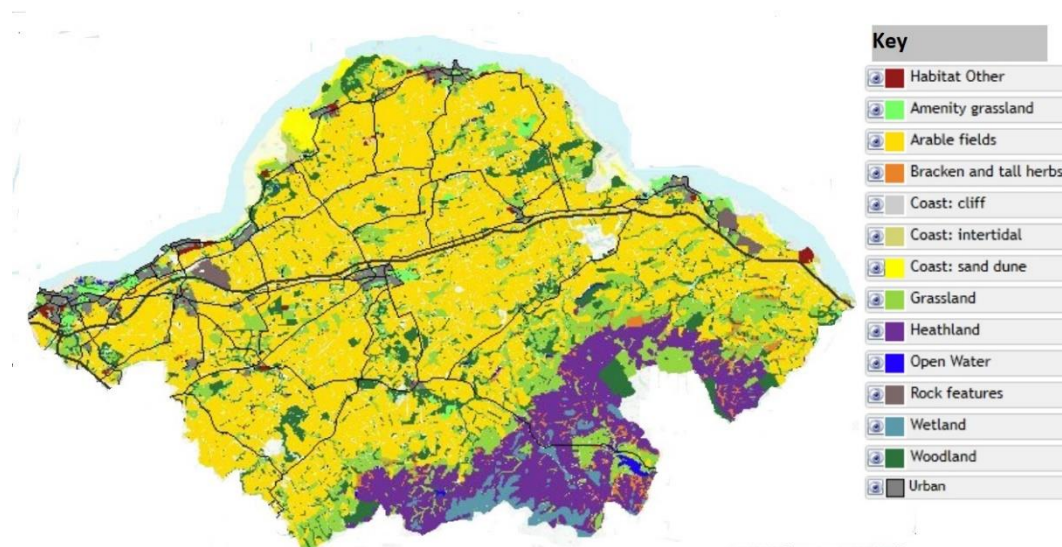


Figure 2 Extract from Tree and Woodland Strategy for East Lothian

10. Habitat mapping was carried out for the Central Scotland Green Network of five main habitat types: woodland, bog heath, wetlands, grassland and acid grassland. This mapping also shows potential areas for expansion of these habitats.

### Coastal and marine habitat

11. Includes sand dunes, salt marsh, rocky shores and low cliffs, estuaries and coastal grassland, intertidal area and sea. The majority of the coastal area is designated for biodiversity at international and national level, and most of the remainder at local level. Issues for coastal habitat relevant to development planning include:

- squeeze on coastal habitat from sea level rise/erosion on one hand, and development and agriculture on the other – mobile dune systems and coastal grassland
- Coastal flooding and defences
- Coastal change and erosion
- Recreational pressure
- Pollution from waste including sewer overflow
- Appropriate placement of renewable energy infrastructure
- Management of invasive species

### Woodland

12. See 'Trees and Woodland' below. The Tree and Woodland Strategy sets out the existing woodland habitats, and where these can be expanded.

### Freshwater and wetlands

13. Wetlands have suffered historic loss through drainage for agriculture and culverting and canalisation in association with both agriculture and development. Ponds, including temporary ponds, have also historically been removed. Intensification of land use has resulted in run-off



and diffuse pollution. Riparian water quality is also affected by changes to morphology, again often for agriculture. The SEPA [water classification hub](#) shows information on water quality of natural water. SEPA's Scottish Wetland Inventory data shows areas of wetlands.

14. Lack of tree cover along water courses can adversely affect the quality of the habitat as trees can regulate water temperature, provide food for species within the water, and intercept pollutants. Too much shade can also adversely affect watercourses. The Tree and Woodland Strategy identifies the riparian area throughout East Lothian and contains targets for increasing riparian woodland to a more ecologically beneficial level.
15. Almost all the larger water bodies in East Lothian are artificial, with some still in use as reservoirs.
16. Wetland specialist species are showing a decline nationally. Atlantic salmon have suffered serious decline, the reasons for which are complex and not all related to river habitat. Hotter, drier summers with climate change are likely to lower water levels, affecting rivers and wetlands. In 2022 SEPA suspended water abstraction licences in the Tyne catchment to protect the sustainability of the local water environment following prolonged dry weather and critically low river and groundwater levels<sup>1</sup>. Abstraction could exacerbate this issue.

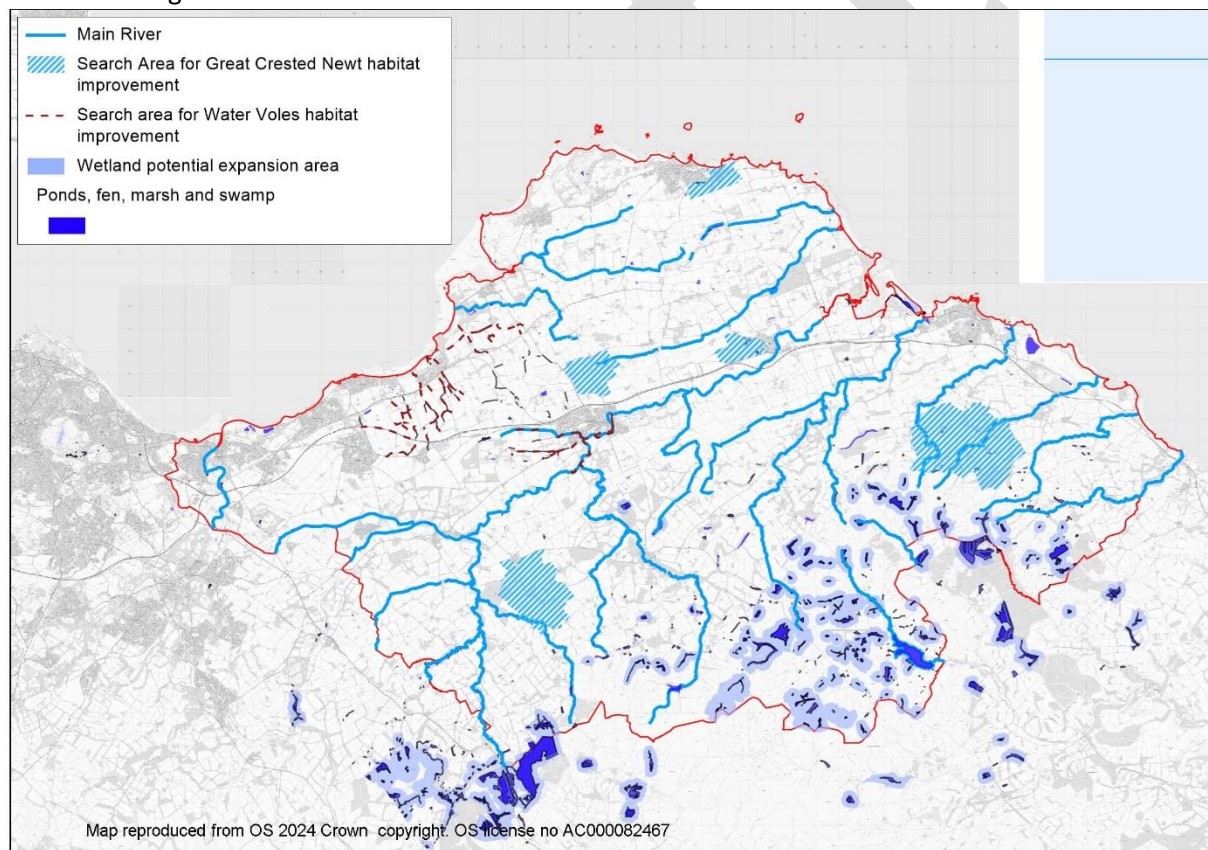


Figure 3 Map of areas of existing wetland and potential new habitat based on East Lothian's Green Network Strategy

17. Issues for freshwater and wetlands (including groundwater) relevant to development include:
  - Inclusion of the water environment in Nature Networks
  - The need to protect wetlands may limit water heavy uses especially with climate change.
  - The potential for wetlands to host disease bearing species may become more of an issue over time for the location of both wetland and development.

<sup>1</sup> Fisheries Management Scotland "31 August 2022: Further suspensions on abstraction licences to protect local water environment in east of Scotland" [website](#) accessed 20-03-2024

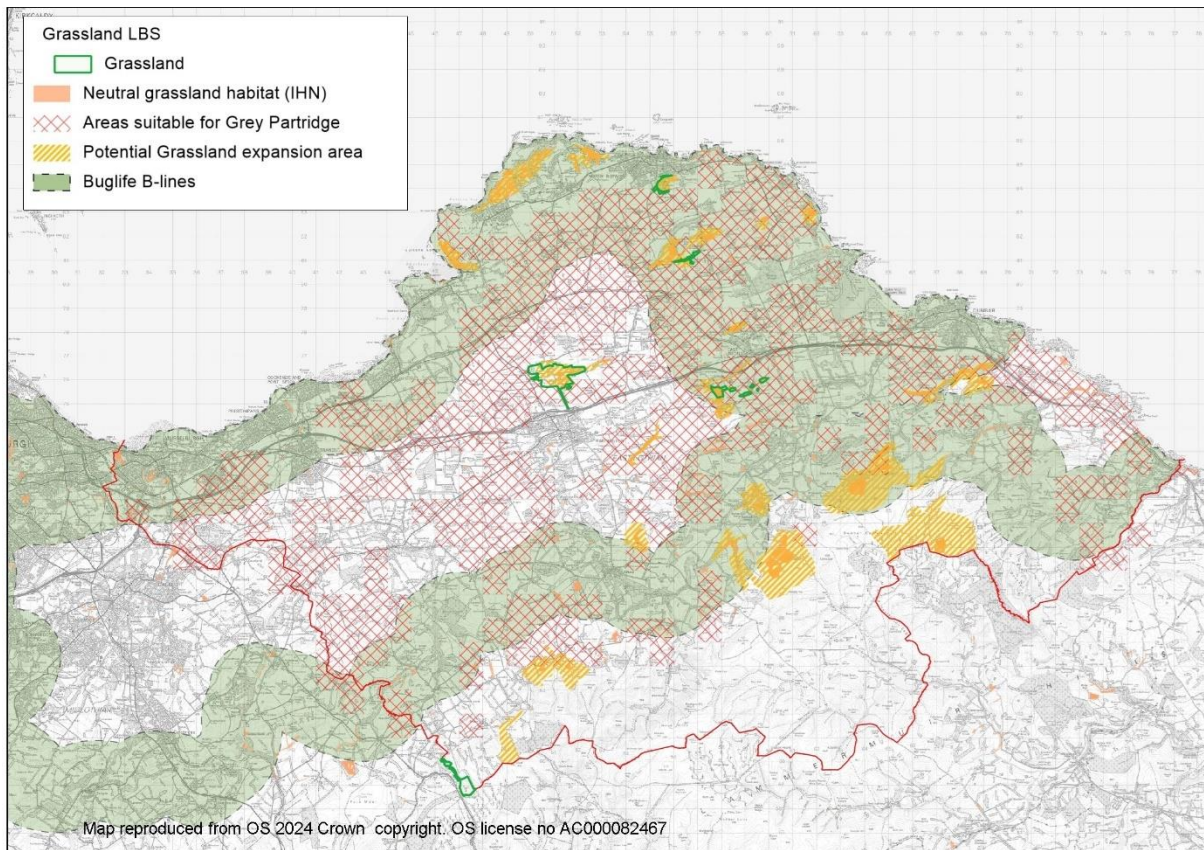
- Recreational pressure on sensitive wetland habitat
- Pollution and nutrient enrichment

## Urban

18. Although urban areas are often seen as not biodiverse, the variety of treatments of land surfaces and building brings variety, and with that comes diversity. Planting in gardens and urban open spaces can sometimes provide more food and shelter than the surrounding arable area. The Council has been carrying out a programme of biodiversity improvement in its parks and open spaces, introducing a variety of different habitats. Tree canopy coverage is often higher in urban areas than the surrounding land. However, development in urban areas can detract from biodiversity through direct habitat loss as well as barrier effects of disturbance and physical barriers.
19. Much of the development that comes forward over the plan period is likely to be within urban areas. As the urban area is where most people are most of the time, it has the best potential for increasing their experience of nature. The peri-urban environment – the phasing point between ‘countryside’ and ‘urban’ – needs to be considered to ensure nature enhancement. How to enhance the urban/peri-urban habitat is an important consideration for the LDP.
20. Issues relevant to development include:
- Avoiding fragmenting existing habitat connections through the urban area, and enhancing these where possible.
  - How to encourage and embed long lasting biodiversity measures into new development
  - How to manage the urban/peri-urban/countryside transition to secure nature networks and biodiversity enhancement.

## Grasslands

21. East Lothian has around 4700 hectares of grassland made up of coast, dune, acid, neutral, calcareous and marshy grassland, as well as other grassland mosaics. Grassland is a valuable but often overlooked habitat, which has seen changes in line with changes in farming practices and funding. Species rich neutral grassland has seen massive decline across the UK since the 1930s for this reason. As much of the land in East Lothian is in arable use, farming is the most significant factor for grassland. However, even regularly ploughed and harvested land can have biodiversity value, including for some qualifying interests of the Firth of Forth Special Protection Area (see below). Some species, for example some farmland birds such as skylark, have evolved in tandem these with agricultural change, and rely on particular farming practices such as grazing to be maintained. The council has introduced conservation grazing on sites it manages at Traprain and North Berwick Laws, and at Barns Ness. There may be some opportunities for enhancement of grassland habitat using similar approaches elsewhere.
22. The map below shows the grassland habitat included in the council’s Green Network Strategy. The mapping includes the Buglife B-lines, which aim to create insect pathways in towns and country, where Buglife are promoting a series of wildflower rich habitat stepping stones to create a network.



23. Issues for grassland habitat relevant to development include the lack and fragmentation of current grassland habitat; development for renewable energy infrastructure; recreational pressures.

24. Opportunities for enhancement of grassland include

- Management of roadside verges
- Establishing grassland in urban areas: naturalising urban greenspaces and enhancing existing grassland for pollinators
- Enhancement of farmland habitat
- Support for the B-Lines project





Figure 4 Grassland area at Papple planted to encourage biodiversity as part of the restoration of the steading

## Farmland

25. Farmland covers much of East Lothian. Changes in agricultural support influences how the land is managed, as shown by the Grey Partridge project, which was successful for a time due to funding for set aside allowing field margins to remain unploughed. As noted above, arable land is important in some areas as supporting habitat for geese and waders including those of the Firth of Forth Special Protection Area. Farming support is changing to become more linked to biodiversity outcomes, and this is likely to lead to improvements for wildlife.

## Uplands

26. East Lothian's uplands mostly consist of rough pasture, land managed as grouse moor, and some coniferous plantation woodland. Lammer Law SSSI includes East Lothian's largest area of blanket bog. Peatland restoration has taken place at the Hopes Estate under NatureScot's Peatland Action programme. This involved re-wetting the bog to allow *Sphagnum* moss to flourish through ditch damming, installing sediment traps and stabilising gullies. This led to a noticeable increase in water retention and development of bog mosses. The work has reduced peat erosion downstream and so will help reduce carbon losses from the bog. Peatland restoration is a key goal of the Scottish Climate Change Strategy, in addition to its biodiversity benefits. The population of Black Grouse which was formerly in this area may not now be viable. The main issue for upland habitat is likely to be integrating its protection with renewable energy infrastructure.

## Species

27. East Lothian has recent records of over 300 bird species, around 40 species of mammals, three reptile and five amphibian species. There are also an estimated 4000 species of invertebrate, as well as crustaceans, spiders, worms, and fish, not to mention a wide variety of plants and fungi. The Wildlife Information Centre holds extensive records on species, including the level of protection, and rarity.

## Protected species

28. The Wildlife Information Centre records of European Protected Species in East Lothian since the adoption of the LDP are of soprano pipistrelle, Common Pipistrelle, Daubenton's Bat, Brown Long-eared Bat, bats (unspecified) and otter. There have been previous records of Great Crested Newt, and Brandts, Natterer's and Noctule Bat. Absence of records does not necessarily mean absence of species. A project taking place in North Berwick, where there is a small population of great crested newts, is looking at whether road drains are causing problems for newts, frogs and toads as they move from hibernation sites to breeding ponds. There are other areas which have historic records of great crested newts, and they may still be present in some of these places. Otter appear to be increasing in East Lothian<sup>2</sup> and a group of volunteers have recently started surveying East Lothian's waterways for signs of both otter and water vole.
29. In the marine area since the adoption of the LDP, TWIC has had records of common porpoise, common dolphin, Bottle-Nosed Dolphin. TWIC has earlier occasional records of Atlantic White-sided Dolphin, Fin Whale, Killer Whale, Long-finned Pilot Whale, Minke Whale, Northern Bottlenose Whale, Sowerby's Beaked Whale, Sperm whale and White Beaked Dolphin. Two minke whales were stranded on the beach in North Berwick recently.
30. Badger, which are protected due to their history of persecution rather than rarity, are not uncommon across the area.

## Species trends

31. The BSBI and BTO Birds of Conservation Concern data gives more detailed information on which species are declining and which increasing. The Firth of Forth SPA has 26 qualifying features, of which only 6 show an increase. Fourteen show a decrease, with the remainder having insufficient data to tell. Red alerts – sent out by the BTO when there has been a long term decline of over 50% - have been issued for six of these species/ Amber alerts – where there has been a decline of between 25-50% - have been issued for a further eight of the qualifying features. Some of these declines are due to pressures elsewhere rather than in East Lothian. Avian flu has had an impact on some of our seabird populations, including the iconic Bass Rock gannets.
32. WeBS data gives information on trends for waterbirds including some of the qualifying interest species for our Special Protection Areas.
33. There are 25 species of butterflies known to breed in East Lothian, with two or three additional species that are occasional visitors to the area. Some butterfly species that dispersed south in the early 1700's have been increasingly recorded here, for example Speckled Wood and Wall Brown returned, moving along the coast from Dunglass. Wall Brown are thought to be moving north in response to climate change. Small skippers appeared in Gullane and Aberlady, while Holly Blue, rarely recorded in East Lothian before 2019, were spotted across the area in 2023. There have been projects to support some butterfly species with habitat creation and translocation.
34. Climate change is likely to bring significant shifts in species populations, with potentially loss of species that prefer a cooler climate, and arrival of those that thrive in currently warmer climates. As well as changes to mobile species there are likely to be changes to plant and tree species, and their pathogens. This has the potential to bring significant change to the landscape.

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<sup>2</sup> ELC countryside rangers <https://www.elcv.org.uk/tasks/monitor-wildlife-2/>

### Invasive non-native species

35. Invasive Non-Native Species can bring issues for native plants and animals, as well as sometimes being problematic for other reasons. Species which are being tackled as a priority in East Lothian include Giant Hogweed and Himalayan Balsam, which mainly afflict rivers, and at the coast, sea buckthorn, pirripirri burr, and Japanese Rose. Japanese Knotweed can destroy the structure of the soil and also affect the built environment. It can be spread between building sites by movement of material and vehicles. Along with the less damaging but fast growing Russian vine this plant can be found inland.

### Over abundant species

36. Deer, although some are native, can also be problematic, affecting habitat by grazing. This can mean in particular that woodland habitat can be damaged and new woodland is difficult to establish. Deer also have the potential to spread tick born illness, which may become more of an issue with climate change. The LDP may have to consider deer in planning for green networks.

### Natural Places

#### NPF Policy 4

LDPs will identify and protect locally, regionally, nationally and internationally important natural assets, on land and along coasts. The spatial strategy should safeguard them and take into account the objectives and level of their protected status in allocating land for development. Spatial strategies should also better connect nature rich areas by establishing and growing nature networks to help protect and restore the biodiversity, ecosystems and natural processes in their area.

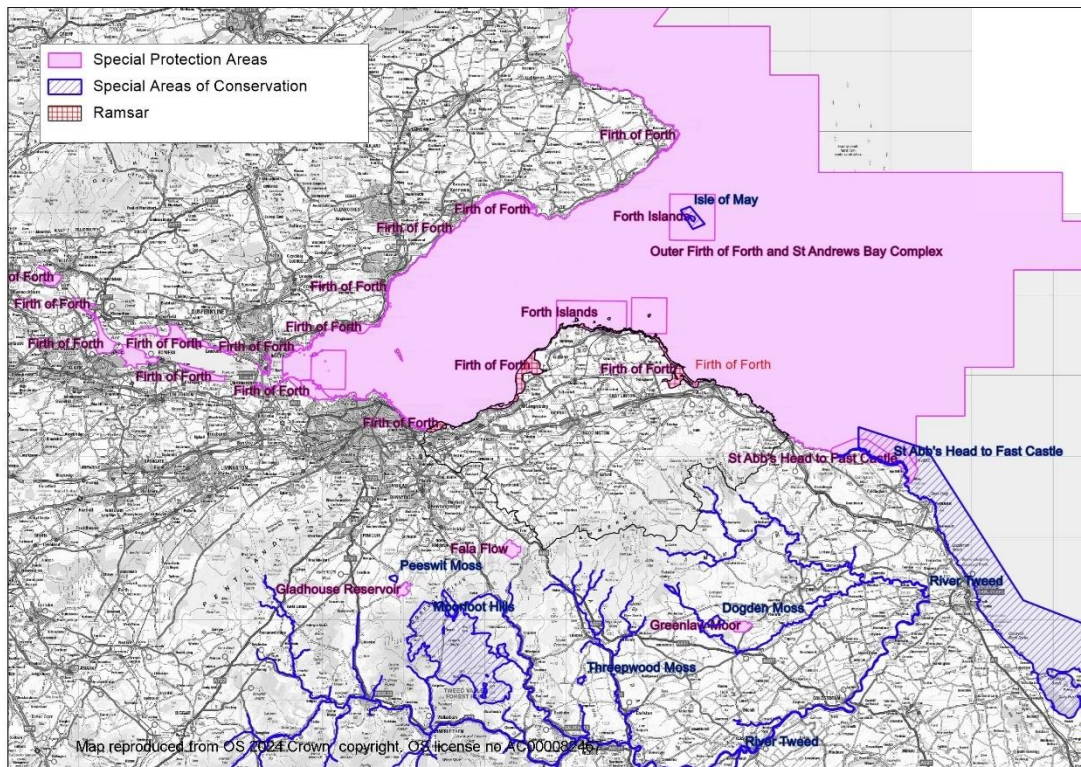
### Designated sites – biodiversity

37. Further information on European Sites, Ramsar sites and SSSIs can be found at NatureScots Sitelink website, and the BTO website. Information on the condition of the features of the site can also be found there.

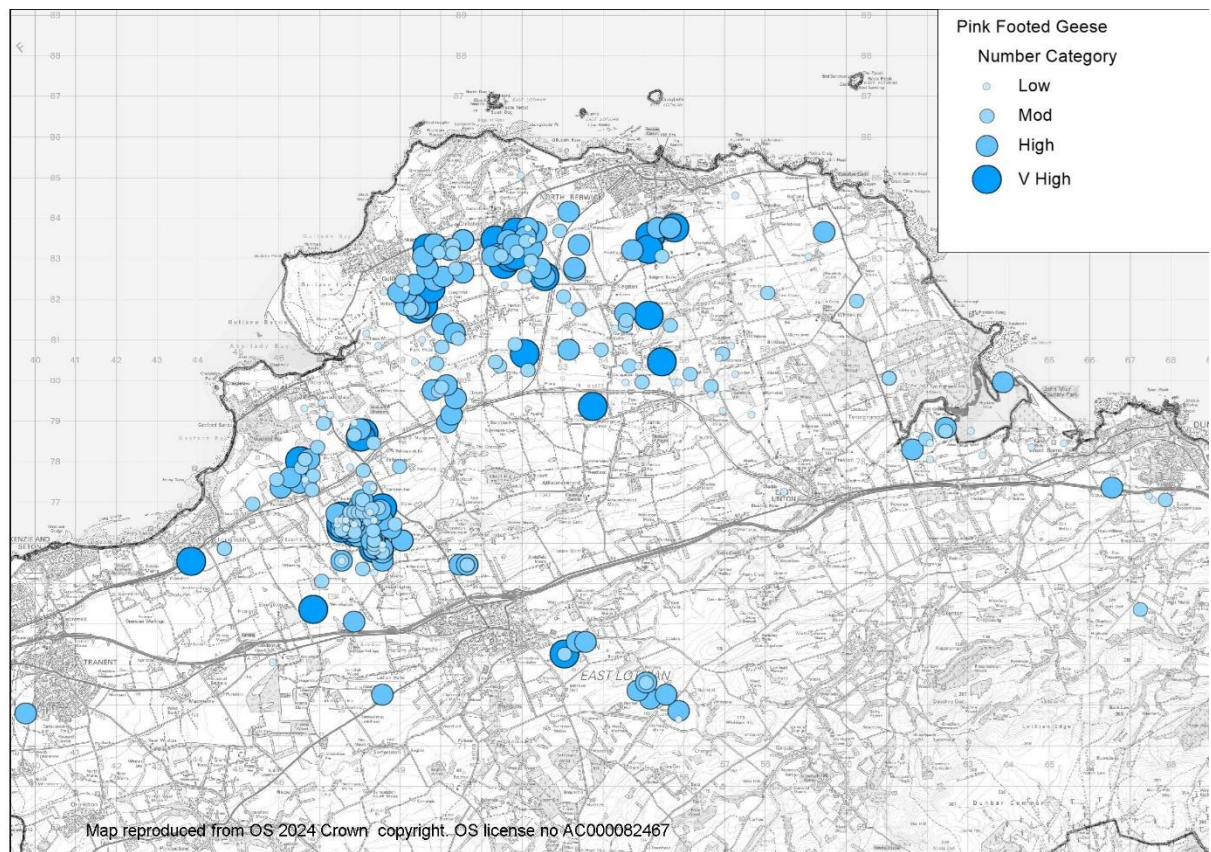
### European Sites

38. At international/national level are European Sites and Ramsar sites. There are three European Sites partly within East Lothian, Firth of Forth Special Protection Area (SPA), Forth Islands SPA, and the Outer Firth of Forth and St Andrews Bay Complex SPA, which marginally overlaps East Lothian at the edge of the intertidal zone. The only Ramsar site in East Lothian is the Firth of Forth, which shares boundaries with the Firth of Forth Special Protection Area. The following map shows the location of European and Ramsar sites in and near East Lothian.





39. Some of the sites outwith East Lothian have potential ecological connection with our area, while some of the qualifying feature species from sites within our area also rely on areas of supporting habitat in East Lothian outwith the site. The main areas are;
- areas of open land around the coast used by inland waders for forage and high tide roosting;
  - arable fields used for forage by pink footed geese;
  - waterbodies and other areas potentially used by gulls, cormorants and others for foraging
  - upland areas which either drain into the River Tweed SAC or are used by breeding populations of waders which are linked to the Firth of Forth SPA
40. This supporting habitat can be important to maintain the integrity of the European sites. BTO Wader Sensitivity Mapping shows the areas most used by waders which are qualifying interests of the Firth of Forth SPA. East Lothian Council has records of areas used by pink footed geese, which can vary annually. The geese prefer agricultural land, especially large, open fields. Some gulls are also suffering declines, and further information on the habitat and feeding requirements of these species, which can also be associated with European sites, may be needed.



41. NatureScot and BTO monitoring data shows that not all of the qualifying features of these sites are in 'favourable maintained' condition. For some species this may be due to pressures at the site in East Lothian while for others it is due to changes elsewhere.
42. Issues which could affect at least one of the qualifying interests of these sites that the LDP could have some influence over include direct habitat loss; indirect habitat loss including from disturbance from recreation (mainly walking and dog walking but also potentially watersport), lighting or noise; availability of forage or prey; water quality and pollution; introduction of pathogens; or introduction of invasive species. There may also be opportunities for enhancement to these sites through development.
43. European Sites have statutory protection under the Conservation (Natural Habitats, &c) Regulations 1994. The Regulations require that where a plan (or proposal) is likely to have a significant effect on that site, the council must undertake an "appropriate assessment" of the implications for the conservation interests for which the area has been designated. If it is not possible to be sure that the plan will not adversely affect the integrity of the site, the plan can only be adopted if there are imperative reasons of overriding public interest for doing so.

### Site Sites of Special Scientific Interest, and Geological Conservation Review sites

44. Many of the qualifying interest features of our SSSIs were not in favourable condition when last reported (see NatureScots Sitelink website).

### Ancient woodland

45. Ancient woodland, which is identified in a NatureScot Inventory and National Library of Scotland records, is also given strong policy protection.

### Local Sites

46. At local level are Local Biodiversity Sites, a Local Nature Reserve and Country Park.

47. East Lothian's Local Biodiversity Sites were designated in 2018, replacing the former Wildlife Sites. Their purpose was to support the SSSIs, protect locally or regionally important biodiversity, and also protect at least one biodiverse area in each of our main settlements. This remains a valuable role.
48. Information about these sites is contained in Technical Note 10 to LDP1. A methodology for monitoring of these sites has recently been agreed between the Scottish Wildlife Trust and East Lothian Council. A programme of monitoring will start this year, supervised by Scottish Wildlife Trust and the council, with support from The Wildlife Information Centre.
49. Aberlady Local Nature Reserve, between Aberlady and Gullane, was the first site in the UK to be designated a Nature Reserve. It therefore has a long history of being managed for both people and nature. The reserve is at the estuary of the Peffer burn, an area of low lying coastal habitat including sand dunes, salt marsh and coastal grassland. The extensive estuarine area is a key area for wintering birds of the Firth of Forth designated sites.
50. John Muir Country Park, 1763 acres of land north west of Dunbar at the Tyne Estuary, is East Lothian's only country park. It was designated in 1976 to provide for outdoor recreation as well as a measure of protection for wildlife and landscape through management agreements. Most of the country park is covered by designation as the Firth of Forth SPA/Ramsar and/or SSSI. The park takes in 8 miles of coastline from Peffer Sands to Dunbar Castle, and so has a mix of natural and semi-natural habitat including low cliffs, rocky shore, saltmarsh, coastal grassland, saltmarsh, and wide, expansive beaches. There is also some plantation woodland, which suffered extensive loss in Storm Arwen.

### Geodiversity

51. East Lothian has three SSSI sites which are designated for geological interest alone (Bangley Quarry, Garleton Hills, and Keith Water) and a further four which are both geological and biological (Barns Ness Coast Firth of Forth, Traprain Law, Rammer Cleugh). There are twelve Geological Conservation Review Sites, some of which have boundaries which are not within the existing SSSIs, notably at Oldhamstocks Gullies. The Geological Conservation Review aimed to identify sites sufficient to represent the whole of the geology of the UK, and so the sites should be seen as part of a coherent series. The parts of these sites outwith SSSI boundaries are given policy protection but do not benefit from Operation Requiring Consent controls, so could be lost through land management practices.
52. Local Geodiversity Sites were designated in 2018, based on an audit by the British Geological Survey carried out in 2014. There has been no monitoring of these sites since however this is intended to be carried out.

### Landscape designations

53. There are no National Scenic Areas in East Lothian. Special Landscape Areas were designated in 2018 based on work carried out from 2014. Almost half of the area is designated as Special Landscape Area. In addition, both the John Muir Country Park and Aberlady Nature Reserve have landscape elements to the designation. The Edinburgh Green Belt and Countryside Around Towns designation (covered in 'Countryside) also protects the landscape setting and identity of the city of Edinburgh and towns and villages in East Lothian.



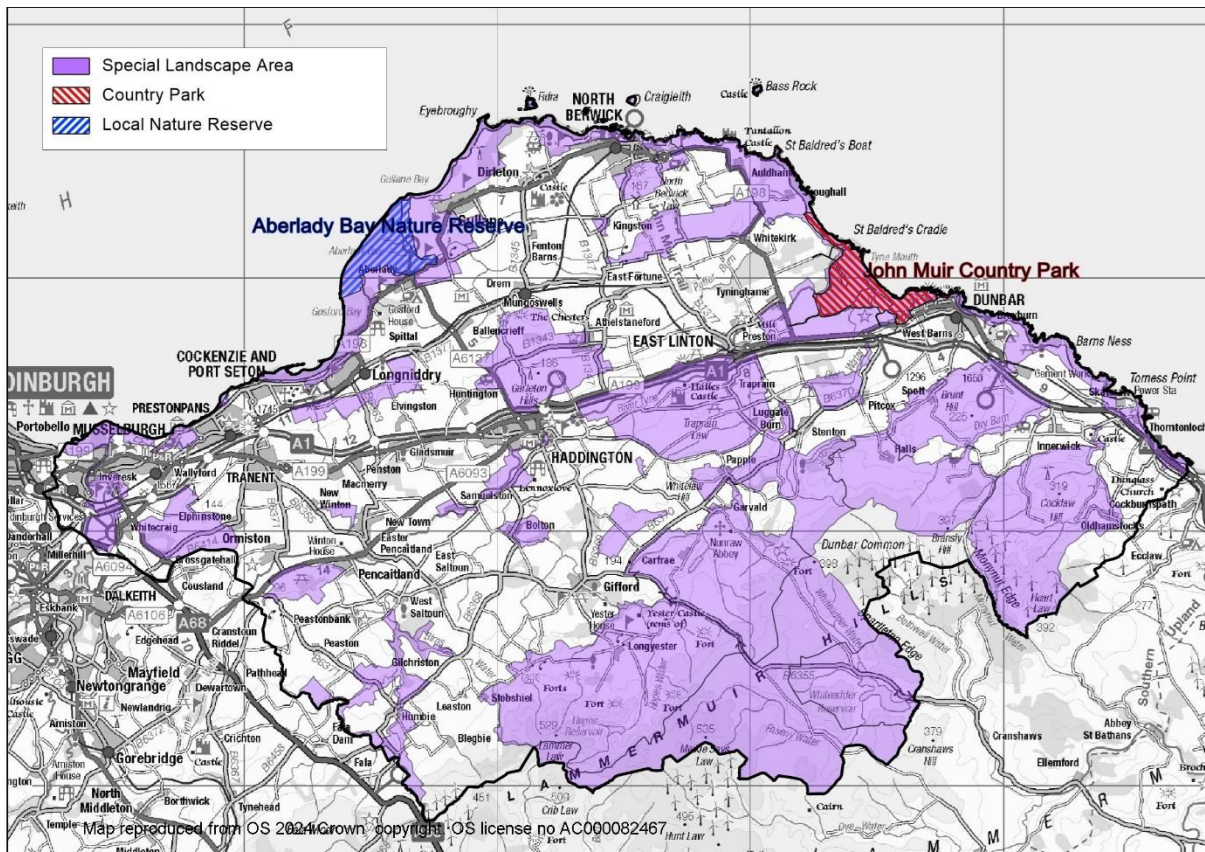


Figure 5 Landscape designations in East Lothian

## Nature Network

“A Nature Network is a joined-up system of places important for wild plants and animals, on land and in water. It allows plants, animals, seeds, nutrients and water to move from place to place and enables the natural world to adapt to change, providing plants and animals with places to live, feed and breed. Effectively functioning nature networks will connect existing nature rich areas through habitat corridors, habitat ‘stepping stones’, or habitat restoration areas” (National Planning Framework 4)

54. The Nature Network is a key delivery mechanism for the Scottish Biodiversity Strategy, which states that ‘Nature Networks across our landscapes will underpin the resilience and health of species and habitats’. In addition to inclusion with NPF4 Policy 3 they are also part of the function of Green Belt (see Countryside topic paper). The Nature Network is important in itself, but it can also be planned to achieve other benefits. For example leaving riparian corridors undeveloped for nature can increase climate resilience by giving rivers space to adapt to changes in flood frequency and magnitude and provide a wide range of benefits.
55. The river network and other water environment features, such as wetlands, are key elements of the natural environment in existing and proposed nature networks. The linear nature of riparian (river bank) corridors provide opportunities to create wildlife corridors and connect habitats. Functioning riparian corridors can help increase the resilience of a place to the impacts of climate change and help address the nature crisis, providing environmental benefits, and a wide range of public services.

56. Other linear features that are likely to be important in forming Nature Networks are woodland corridors including hedegrows and landscaping associated with transport corridors.
57. NatureScot draft guidance indicates the Nature Network will be spatially defined. The core of the network will include sites contributing to 30 x 30 (the aim to have 30% of land area being protected or under other effective area-based conservation measures by 2030). This core may also include some sites that are locally important for biodiversity. These areas will then be connected, mainly through 'ecological corridors'; areas of nature or semi-natural habitat that help species move or propagate (e.g. via seeds) across landscapes. To be effective, the corridors should:
- complement and facilitate the ecological function of the areas they are connecting
  - be of ecologically adequate size, with conservation objectives and management specific to the desired outcomes of a given link within a network
  - be maintained in the long-term to ensure they remain effective
58. Other activities, such as farming or recreation, would be acceptable provided this does not conflict with the primary objective.
59. East Lothian is in a strong position with regard to Nature Networks. Our Local Biodiversity Sites were designated partially with the aim of providing connectivity, and so provide for connections through the landscape. These sites have had a measure of protection through planning policy, though this does not protect against land management or other changes where planning permission is not required. Identification of Nature Networks will build on this. Nature Networks are also vitally important in urban areas/settlements. 'Rural' and 'urban' areas cannot be considered separately - the nature network should continue to and through East Lothian linking from the countryside into and through urban areas, including areas close to where people live.
60. The East Lothian Local Biodiversity Action Plan is currently being reviewed, and the intention is that Nature Networks will be identified through this process, either in the LBAP itself or as a resulting action. The Nature Network will then be reflected in the LDP. Forthcoming CivTech work by Aecom on behalf of NatureScot will identify areas on a national scale where connections would give the most benefit. Their 'Optimiser' tool will allow understanding at a smaller scale, what the effect of a particular intervention would be.
61. Information that will support the identification of Nature Networks includes
- Central Scotland Green Network habitat mapping
  - EUNIS habitat mapping
  - East Lothian's Green Network Strategy
  - Areas of existing woodland habitat and native woodland expansion identified in East Lothian's Tree and Woodland Strategy
  - The Wildlife Information Centre records
  - BTO, NatureScot, and ELC records of use of areas by qualifying feature birds of European Sites
  - SEPA GIS layers including wetlands and waterbodies
  - East Lothian pond data, derived from Ordnance Survey
62. In addition to using sources of data there cross-boundary working will be needed to identify connections beyond East Lothian.
63. Once identified, the Nature Network will be delivered by a variety of means. These include [Agri-Environment Climate Scheme](#) payments, the [Nature Restoration Fund](#), the [Riverwoods](#) project and many others. The council will take action on land it owns as resources permit, including through implementing it's Nature Networks in Parks and Greenspaces Action Plan . The spatial strategy of the LDP will require to take the need to provide for Nature Networks, including those



in urban areas, into account. The site allocation process will consider whether sites can avoid harm to and/or positively contribute to the Nature Network. The LDP will also consider whether contributions to the Network are appropriate and if so what form this should take.

## STAKEHOLDER ENGAGEMENT – Nature Crisis/Biodiversity/Natural Places

### Online survey

64. The online survey asked ‘How can the LDP address the nature crisis?’ Responses were focussed on the following areas:
65. **Strategy:** a radical plan for nature is needed. Many parts of the county are very degraded and declining. From the uplands down to the more productive farmland that is highly cherished, soils are at risk, with a vast reservoir of soil biodiversity, which is still poorly understood. Intensification has pushed nature to field margins, so new areas need to be identified to buffer rivers and streams, to restore natural functioning systems at a catchment and landscape scale. This could be easier to engineer in some areas, e.g. south of Dunbar where cumulative industrial development has left a disappointing legacy and scars, but opens up the possibility of significant at scale restorations, e.g. post mining (inadequate by modern standards) and post landfill and post energy infrastructure. Every habitat should be buffered. Landscape improvements can also help, with hedgerows and shelterbelts relinking stranded habitats. The LDP should identify the areas where environmental protection and improvement can best take place. Landscape scale approach to restoring watersheds, changing land-use and management to encourage and enable natural regeneration of habitats in, and along the edge of, the Lammermuirs plus active tree planting where necessary and creation/restoration of wetlands. NPF4 policy 3 states developments should prioritise the enhancement of biodiversity, restoring degraded habitats and strengthen nature networks
66. A holistic approach should be taken, optimising mutual benefits for the natural and historic environment, of which all of our landscapes, urban and rural, are part. The historic environment is a finite resource, and it is highly susceptible to changes in land use and land management. This makes it vital that land management for biodiversity is informed by an understanding and awareness of both the cultural and natural dimensions of our landscapes (Sustaining Dunbar).
67. **Green Network:** There should be new woodlands to walk, relax, connect and for wildlife. Instead there is increasing pressure on existing sites that many drive to, with increased, concentrated footfall increasing wildlife disturbance. Connectivity between different areas of woodland and nature should be increased. The LDP should strengthen nature networks and the connections between them through the development of Green Networks. Use of greenspaces (parks and gardens) to enhance biodiversity.
68. **Protected Areas:** There should be more protected/wild areas, with community involvement. Encourage the establishment of local wildlife protected areas. Existing woodland and biodiversity habitat should be protected from development. Large areas of East Lothian need ‘Protected’ status to ensure wildlife can survive and thrive. Many historic sites have been protected from development, which has also allowed preservation of local habitats and species. They can be reservoirs of wildlife. The LDP can identify key conservation and environmental protection areas and also identify where developments/improvements can take place through the development of new housing.
69. **Special Protection Area:** Wildlife around Belhaven Bay and Tyne Mouth has been decimated by human use, especially since Covid pandemic. Dog ownership has increase, and off lead dogs near the shoreline has decimated populations of seabirds such as oystercatcher, dunlin, redshank,

terns, gulls etc. There are insufficient places for people to leave rubbish (probably because you have deemed it too expensive to collect) and, as a result, litter is left by many people. Local litter pickers do their best, but fight a losing battle. This litter is poisoning our sea life and wildlife. Coastal habitats need to have some no-go areas to protect what little is left; half of John Muir Country Park should be dog free and prioritised for nature.

70. **Location and restriction of housing development** fewer/no more houses. Stop building houses on existing habitat or areas of known wildlife activity including woodland. Build Stop suburban spread and keep green land. Locating housing within existing towns. Do not build on greenfield sites. Stricter criteria for second homes were also suggested. Reduce new housing in rural areas, or keep them small and include interconnecting green space. However, the view was also expressed that high quality soils through intensive arable farming are probably the least diverse habitats for wildlife so the issue with their development is not clear, as they considered there is no shortage of high quality soils or food (some unreferenced figures are given for food).
71. **Development requirements:** Set design standards for housing to support nature e.g. tree planting. Policy should encourage new and better development that includes impactful and diverse green spaces to shift to a more positive relationship to green space and nature in towns as well as the countryside. All development should integrate smaller scale natural features and connect this to the surroundings. Larger developments should ensure the preservation of existing habitat, including trees, not clear and replant (trees appeared to be lost unnecessarily at Limeylands). This includes "scrub" which is often a very rich habitat for insects. Larger developments should include allotments, community gardens and orchards. Hedging should be used instead of fencing.
72. New planting should be geographically suitable, enhance wildlife and not depend on watering. Use of native plants alongside climate resilient planting. There should be reduction of grass cutting with areas left unmown. New housing development can incorporate nature trails to encourage wildlife to areas. Other specific measures related suggested to support wildlife in development were inclusion of bat boxes, hedgehog highways (gaps in fences), beehives, bird and bat boxes on retained trees, seeds mixes and habitat diversity areas; opportunities to design for foraging; creating a planting structure rich in fruit, berrying plants and herb species can enrich local living and add to biodiversity.
73. **Nature in buildings** Green roofs and bee bricks should be considered for appropriate buildings.
74. **New habitat areas:** Comments related to land use and farming included that areas should be set aside for re-wilding, for small-holdings and for market gardens. Taking measures to encourage nature friendly farming were suggested. Farms should be encouraged to restore hedgerows and experiment with agroforestry. We should be creating new meadows and woodlands. Support the Nature Friendly Farming Network <https://www.nffn.org.uk/> as modern agriculture has contributed to the crisis by removal or neglect of hedgerows and other habitats.
75. **Trees and woodland** Council should be firmer on avoiding removal of trees for housing development. Scrub and woodland should be included as part of developments. Planning conditions so developers provide quality green spaces (not just grass) & factors maintain communal areas in the interests of biodiversity. There's a lack of quality and substantial, joined up greenspace in much of new housing development, too much piecemeal add on of greenspace in tiny patches. Trees and hedges should not be cut down. The Council in particular is guilty; every hedge and tree belt matters. Saplings cannot replace a mature oak. Plant more trees and small woodland near or in urban areas.
76. **Gardens:** About gardens, respondees suggested education about habitat creation in gardens, or more traditional gardening; avoiding hardstanding in gardens for driveways; and avoid houses and extensions being built so there is little garden left. Developers should be required to design

gardens that are nature friendly. There should be a programme of encouraging wildlife conservation in gardens.

77. **Community involvement/education:** Community involvement is vital. Communities should have the chance to participate in rewilding/conservation activities. Work together with wildlife organisations to build wildlife into development. The LDP can encourage appreciation of the impact changes that are being made can have, such as telling people the benefits of local trees and of more and diverse tree planting. Preservation of nature needs to be upfront in people's minds, which means more education about the potential threats and damage that people can do.
78. **Flood Protection:** At the time of consulting on the evidence report, a major Flood Protection Scheme in Musselburgh was under consideration. This may have prompted the comment that climate change adaption could have a large impact on biodiversity. In planning for floods and sea level rise we should work with nature not against it. Invest in nature-based solutions to address flood risks and don't try to tame nature by building walls. A whole catchment approach to the risk of flooding on the Esk is needed, along with beach nourishment at the coast. Respondents also called for the Musselburgh scheme to be paused, for the River Esk to be protected and river habitat restored, and for healthy trees to be retained.
79. **Habitat restoration:** Planning was noted as important in managing landuse. Existing habitat should be restored. Landscape scale interventions are needed, with funding to match. A suggestion was made of picking a demonstration area where such interventions could be made, and funded, with the Dunbar-Dunglass area (East Lammermuir Community Council area) offering a degraded area where this could be done. the Lammermuir Deans and other SWT reserves it is easy to see the riverine valley objectives. The coastal restorations maybe more complex to re-engineer. Other thematic areas would see prescriptions concentrated on field margins, public access arrangements, restoring and expanding degraded policy woodlands, the myriad of extant designed landscapes. The uplands and farmland pose greater challenges still, with extractive farming too dominant and ranging and burning in the uplands.
80. **Process:** prioritise biodiversity in planning decisions (23/00911/P – hedge removal at North Berwick High School cited).
81. **Wider drivers of biodiversity loss:** Impacts on nature should be considered when addressing health and climate issues. Better public transport. The LDP should provide an environment within which people can be encouraged to change elements of their lifestyle such as driving less, using local services and using less energy.
82. Reducing traffic on Tranent and Musselburgh High Streets, encouraging local shops and reducing out of town shopping were suggested. Creation of 20 minute neighbourhoods (developer, Newtonlees).
83. Improve compliance with domestic recycling.
84. **Miscellaneous suggestions** included public buildings should have nesting boxes, and that there should be more bins. Improve monitoring of local parks e.g. John Muir Country Park. Issues around pollution from intensive livestock should be more strongly addressed.
85. **Non-planning matters** raised included deer control, higher taxes on second homes, litter - rise in litter arising from new domestic recycling system - issues with fishing lines and nets. Keeping dogs on leads in SSSIs and to avoid sheep attacks. Commercial dog walking should not be permitted in sensitive environments like Belhaven Bay and Tyne Mouth. Educational initiatives in schools paired with the farming community to teaching traditional land management and nature skills; discouraging the use of chemical fertilisers and sprays. More bins needed in John Muir Country Park. Stricter regulation of farmers use of pesticides, hedge cutting and field margins / verge cutting. ELC could adopt initiatives like No Mow May for parks & verge

maintenance. Cutting verges & hedgerows less often protects biodiversity & saves money. Minimise use of glyphosate. Stop using peat. Investigate the reintroduction of beavers.

86. Society/schools have stopped teaching Home Economics - people expect ready meals or ultra processed foods - they do not know how to make a simple nutritious and fundamentally, cheap, meal themselves - that is the problem, not building on quality soils or greenfield sites.
87. **Geodiversity** - no comments were made on geodiversity.

### Place Standard – open consultation

88. Most of the comments that came through the Place Standard engagement on this topic area were around movement and natural spaces as used by people – see Blue Green Infrastructure below.
89. Specific comments on biodiversity were:
90. In North Berwick there was a call to ensure nature corridors with tree planting and natural planting encouraging wildflowers. Asked ‘how could we make it better in the future?’ responses included ‘getting on board with the nature crisis’, find ways to increase biodiversity; reduce herbicide spraying; make spaces for hedgehogs and improve access for them; manage all greenspaces for wildlife and biodiversity; including management of housing estates by factors. A call was made for greater focus on native species and planting for biodiversity.

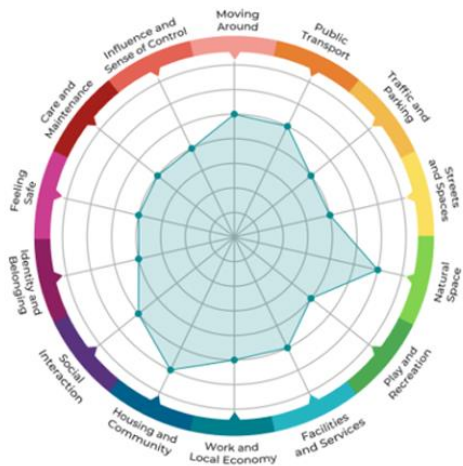
### Events

91. A comment was made at the MECA event that there should be stronger protection around Levenhall Links to protect from any future development, perhaps nature reserve status. A person also said the nature crisis should be addressed by looking at paving in front gardens.
92. Post its included:
- “protect green spaces and habitat” (Dunbar)
  - “conserve natural heritage”(Dunbar)
  - “Dune management and wildflower creation with Area Partnership and Fisherrow Waterfront Association” (Musselburgh)
  - “Protect green space and encouraging nature corridors” (North Berwick)
  - “Restoration of quarry and surrounding area into nature restoration (Whitesands)”
  - “Sand dune restoration at Gullane”
  - “Rewilded greenspace, wildlife corridor and coastal management at Morrison’s Haven”
  - “Cockenzie opportunity rewilding open space”
  - “Town centre traffic pollution -> greening opportunity e.g. street trees, raingardens? Hedges? Wildflower zones? \*aspiration”
  - “Biodiversity net gain – combination of on site delivery and off site/in local area e.g. climate forest” [post it at Crookston]
  - “Habitat network for Tranent”

### Secondary school engagement

#### Place Standard – Secondary school pupils

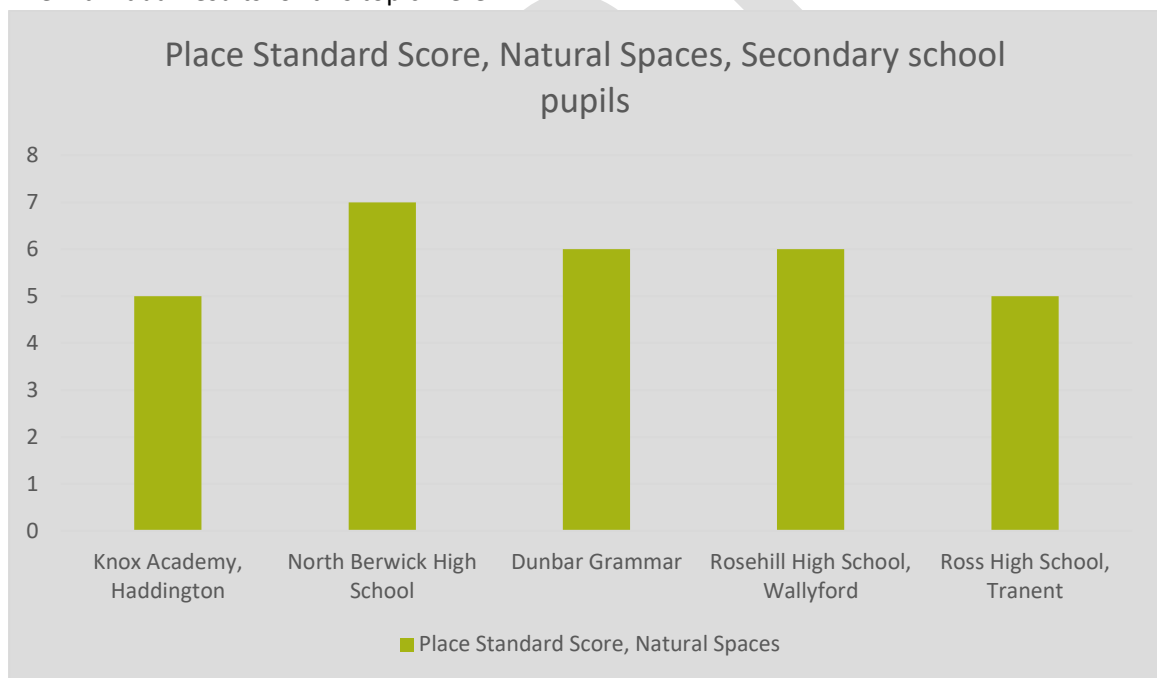
93. In the Place Standard Engagement with young people, overall, ‘Nature – parks, woods, hills and beaches’ was rated highly by participants.



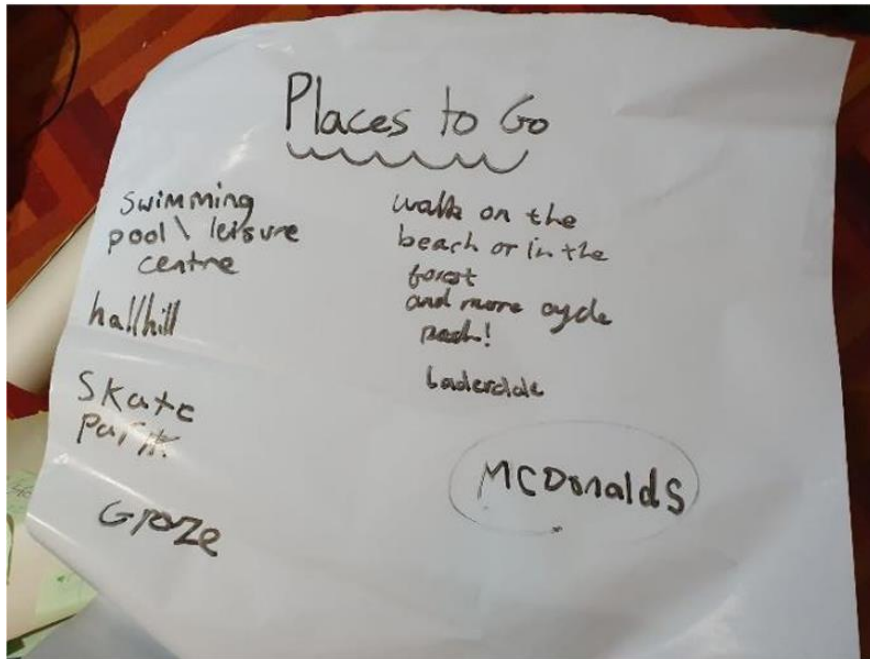
Walking, wheeling, cycling	5
Public Transport	5
Traffic and Parking	4
Streets, squares & buildings	4
Nature - parks, woods, hills, beaches	6
Play, hang out, games and hobbies	4
Schools, libraries, shops, services	5
Jobs and places to work	5
Homes, friends and neighbours	6
Meeting and talking with people	5
Feeling proud and part of a place	4
Feeling Safe	4
Fixed, clean and managed	4
Having our say and being listened to	4

Figure 2 Plotted Place Standard scores for East Lothian

94. Young people appreciated the access to nature they had in much of East Lothian. They were able to identify lots of places that they could go to hang out. The cost of recreational services was an issue for young people.
95. The individual results for this topic were:



96. 'Places to Go' in Dunbar Grammar noted a walk on the beach or in the forest as a place to go:



97. Young people in Dunbar recognised and appreciated their ready access to nature, with a score of 6 given for that theme. At North Berwick, discussing play, hang out, games and hobbies, the access to natural resources was seen as an advantage of living in the area.
98. Young people at Rosehill were the only group that specifically discussed the Nature topic. 91% of young people who responded on this theme were able to identify a wide range of natural environments that they could access regularly. These included North Berwick beach, and parks within the local authority area. At the end of the session, some expressed concern about the number of new houses that were getting built on what they thought were forest or green areas, where they liked to hang out.

### Secondary School questionnaire

99. Parks and/or woodland were popular with young people as places that they liked about their area (see also 'Secondary School engagement, Blue Green Infrastructure, below). Young people were asked what they would like to see done to help tackle climate change. Answers relevant to biodiversity included protecting nature and green areas, planting trees, less reliance on palm oil and pesticides, more green spaces and litter picking/beach cleans and volunteer groups.
100. Specific comments made included: "to make sure the turtles and fish are OK are safe because so much rubbish is going into the ocean"; "stop cutting down the woods and wild areas to build houses"

### Primary School Engagement

101. Some of the findings noted below for Blue-Green Infrastructure are also relevant for this topic, in particular the importance of easy access to natural spaces to children. Key findings of were:
- Concern for nature was an overarching theme across all locations. Children showed knowledge and passion for natural areas and presented thoughtful ideas about the future to protect and create diverse habitats for wildlife.
  - Children's responses show that the themes of places we live, health and nature crisis are closely linked.
  - Children's care for woodland, green spaces, trees and habitats shows they should be involved in decisions about their local area.



102. Small natural areas were as important to children as larger ones (see Primary School engagement on blue-green infrastructure below).



Figure 6 Drawing by child at West Barns Primary School showing local natural areas

103. Wildlife is frequently mentioned by children in relation to places that are special to them. Flowers and trees give pleasure and are understood by children to be important for the environment. Many children are very knowledgeable about wildlife; they enjoy seeing different animals and looking after them in their gardens. This level of knowledge is important for their aspirations to protect areas and their practical ideas to create more diverse habitats.

*"I like where we live because it's a safe space for wildlife."* Child at West Barns Primary School  
*"I like the woods, I see a lot of birds and bugs."* Child at Dirleton Primary School  
*"What's special to me are the trees and flowers and my family."* Child



Figure 7 Drawing of trees and flowers by child at Whitecraig Primary School

at Whitecraig Primary School

104. Specific bushes and trees are mentioned as local landmarks and important places children play near and pass regularly on their way to school. These bushes and trees feature in children's drawings and stories of the area and seem to help children feel connected to nature and their surroundings. These landmarks are also things children want to protect.

*"I like the route to school. There's a big bush I always run into."* Child at Stoneyhill Primary School



105. Children also link natural spaces with relaxation. Many children talked about the beautiful scenery in East Lothian and that they enjoy hill walks, the views, sunsets and having space around them.

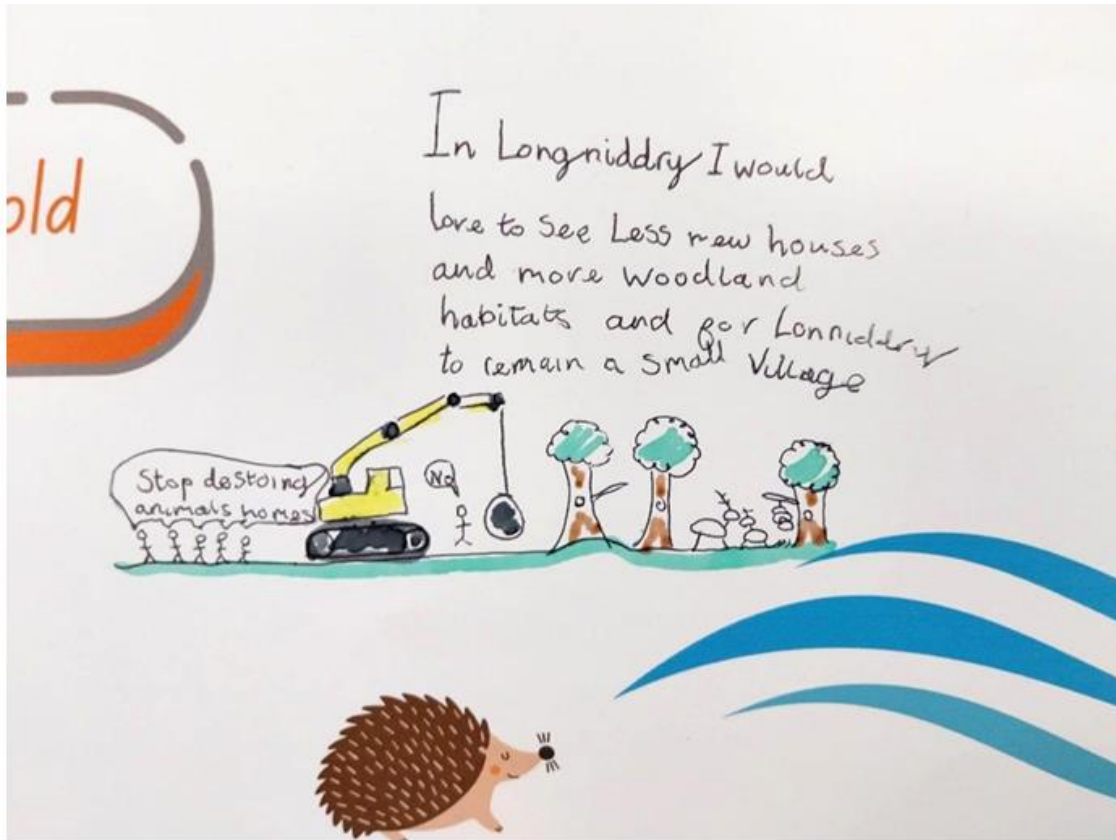
*"What's special is there's places for walks and lots of space."* Child at Longniddry Primary School





Figure 8 "The Law" by a child at Dirleton Primary School

106. Children recognise the link between biodiversity and climate change – they noted the role of trees, flowers, and bees in looking after the planet. There is a lot of concern for climate change and a crossover with the theme of nature crisis. Paths, tracks and old railway lines were mentioned as important places for wildlife (as well as play).
107. Littering was mentioned in every school and was often a key concern for children. Littering was linked with concern about wildlife and climate change.
108. Children had mixed views on housing, and many were concerned about the loss of natural areas. Some looked for a balance of having more houses but also space for wildlife.



109. Figure 9 'Stop destroying animals homes' by child at Longniddry Primary School



Figure 10 Things I want to protect by child at Aberlady Primary School

110. **Nature Crisis** Nature is very important to children across East Lothian. For children this means protecting existing wildlife, creating new habitats and appreciating nature. Children want to protect the wildlife we have in East Lothian and feel strongly that this should be considered when building new houses and roads.

*“Build homes but don’t destroy habitats.” Child at Dirleton Primary School “Keep this a safe place for wildlife.” Child at Longniddry Primary School*

*“Make tunnels to keep hedgehogs safe on the roads.” Child at St Marys RC Primary School*

111. Creating diverse habitats is described as beneficial for wildlife and humans. For the future of East Lothian children would like to see more trees, ponds, flowers and animals.

*“Look after woods and more habitats for wildlife such as ponds.” Child at Dirleton Primary School “Plant more trees and flowers.” Child at Whitecraig primary School*

*“Make spaces for wildlife.” Child at St Mary’s RC Primary School*

*“Hedges and bushes with berries that give food for the birds.” Child at St Mary’s RC Primary School*

*“Better nutritious food by planting fruit trees.” Child at St Mary’s Primary School*

112. Trees are often mentioned as children are concerned that trees are being cut down, and there is a desire from children to plant more trees, ensure they are looked after and protected. Children describe this as important for wildlife, for us and to help climate change.

113. Children also describe links between nature, health and wellbeing with practical ideas to benefit people and the environment.

*“I think there should be less deforestation because no one will have calm places and more bike places as you want to feel safe when you go on your bike.” Child at Cockenzie Primary School*

*“More relaxing bits because sometimes you feel really stressed or angry and you need to calm down, we need something like a circle of meadow with chairs and you can meditate on them.” Child at Cockenzie Primary School*

114. Nature crisis and climate change are closely connected for children. Many of the children’s drawings of the future they’d like in East Lothian show trees, flowers, ponds, a clean environment. Nature was one of the most important things to children about where they lived, with the Nature Crisis being one of the four most important issues (the other three being litter, housing, and traffic).

115. What’s important for children for the next LDP for Nature:

- Protect natural areas, parks and green spaces
- Create diverse habitats, including ponds
- Plant more trees and flowers
- Develop safe access to beaches, woods, parks and green spaces so children have frequent access to natural areas.

116. Engagement with children highlights the connections between the LDP themes of places we live, nature crisis, health and climate change.

- A more natural environment could improve our health and wellbeing.
- Areas with more trees, flowers and wildlife also helps climate change.

## WHAT THIS MEANS FOR THE PROPOSED PLAN – Nature Crisis/Biodiversity/Natural Places

117. Significant improvement is needed to support biodiversity for its own sake but also for the ecosystem services which it provides. Consultation shows that people, including children and young people, are keen to support biodiversity improvements. The Spatial Strategy must reflect the nature crisis by promoting nature recovery and restoration in the area. The LDP must protect, conserve, restore and enhance biodiversity.
118. A crucial part of this work is identifying nature networks and planning to strengthen ecological connections between them. There is evidence of where existing valued biodiversity exists, recognised through designation of sites: European Sites, Local Biodiversity Sites, Local Nature Reserves and Country Parks. Information on supporting habitat for qualifying interest species of the Firth of Forth and other Special Protection Areas is available from the British Trust for Ornithology. This will support consideration of the habitat needed as part of the network for those species and the European Sites. Nature Networks are likely to be identified through Local Biodiversity Action Planning process. CSGN mapping shows where valued habitats exist, and information on where further connections could be made is included in this mapping, and in forthcoming work commissioned by NatureScot in the CivTech project. In addition, The Tree and Woodland Strategy also contains information on where the woodland habitat network could be strengthened.
119. The LDP will require to reflect the Nature Networks, and use planning policy and place based planning to support strengthening them. Planning Obligations may be sought through an infrastructure levy to help deliver nature networks and for this to be achievable costed actions for the delivery of the nature networks will need to be identified. The LDP should guide how enhancement through NPF4 Policy 3 can strengthen the network overall. The LDP must address how planning can contribute to bringing about a significant enhancement in what planning can deliver for biodiversity.
120. The LDP should identify degraded habitat, with a view to seeking improvement. This will be guided by the Local Biodiversity Action Plan and Tree and Woodland Strategy. For example the Tree and Woodland Strategy contains a target for restricting coniferous plantation on ancient woodland sites. This would restore a degraded habitat.
121. Populations of priority species are shown in records from TWIC and the BTO. Some of these will have statutory protection. The LBAP will identify species to focus on.

## AREAS WHERE THERE IS AGREEMENT OR DISPUTE – Nature Crisis/Biodiversity/Natural Places

### **NPF 4 Policy 6**

Local Development Plans should identify and protect existing woodland and the potential for its enhancement or expansion to avoid habitat fragmentation and improve ecological connectivity, helping to support and expand nature networks. The spatial strategy should identify and set out proposals for forestry, woodlands and trees in the area, including their development, protection and enhancement, resilience to climate change, and the expansion of a range of types to provide multiple benefits. This will be supported and informed by an up to date Forestry and Woodland Strategy.

## Forestry Woodland and Trees – NPF Policy 6

### EVIDENCE

122. East Lothian's tree and woodland cover is lower than the Scottish average. The trend from 2011-21 was downwards, mainly due to felling for windfarm development as well as some housing and golf course development. There are some areas of woodland which are protected through designation as SSSI or through a Tree Preservation Order. Woodland within a Local Biodiversity Site also has some protection through planning policy. A felling licence is required for most tree felling operations outwith garden ground.
123. Woodland in East Lothian is a mix of broadleaf and coniferous with native woodlands making up a fifth of woodland coverage. Woodland is concentrated in the river valleys and policy woodlands. The agricultural plain is open, though punctuated by shelterbelts and hedges. The land on the exposed Lammermuir plateau is generally used for grouse moorland, sheep grazing and windfarm development, but also hosts some of our larger areas of productive softwood. Our urban areas on average have lower tree canopy coverage than the target of 30% (Tree and Woodland Strategy, 2023).

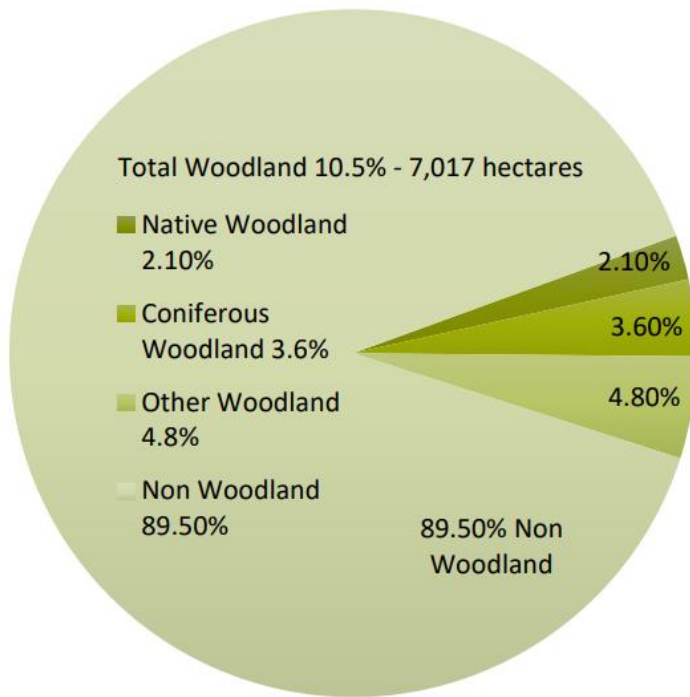


Figure 11 Percentage of landcover by type in East Lothian (extract from draft Tree and Woodland Strategy)

124. 893 hectares of woodland is identified as Ancient Woodland of semi-natural origin. This makes up just 12.5% of East Lothian’s total woodland. The above chart shows the difference between the Scottish Ancient Woodland Inventory for Scotland, mapped in the 1980s, and the Native Woodland Survey of Scotland, which was published in 2013. This shows a downward trend for ancient woodland.

125. Existing woodland is shown on the CSGN Woodland Network 2021 (GIS Layer) and the National Forest Inventory (GIS layer). Ancient Woodland is shown on NatureScots [Ancient Woodland Inventory](#) and [NLS mapping](#) though neither of these datasets show the up-to-date position.

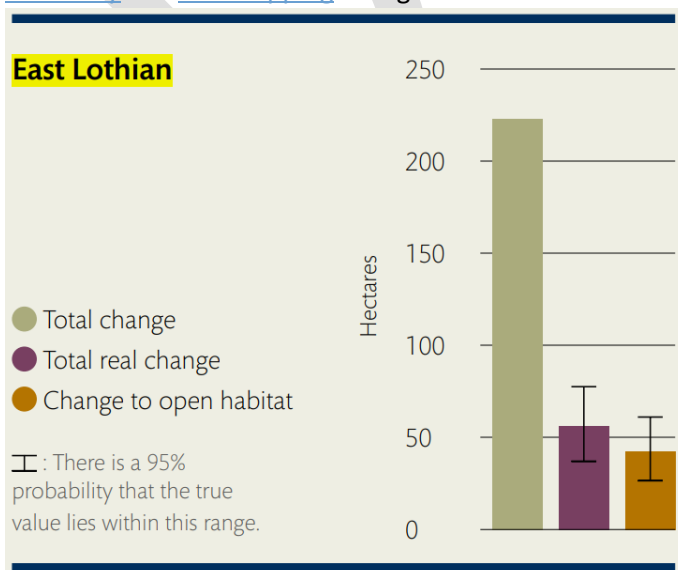


Figure 12 Extract from Native Woodland Survey of Scotland; 'total change' includes map error, 'total real change' and 'change to open habitat' are estimates of actual change.

126. Areas of potential for expansion of woodland is shown in the draft Tree and Woodland Strategy, in a series of maps. The 'Constraints for Woodland Expansion' map there shows areas which are already wooded, areas that have sensitivities or constraints to woodland creation, and potential and preferred areas. This map was produced in line with the Scottish Government guidance "The Right Tree in the Right Place: Planning for Forestry and Woodlands" (FCS 2010)

127. The Tree and Woodland Strategy contains targets and policy for trees and woodlands, including retention of existing woodland in line with the Control of Woodland Removal Policy, the delivery of 2 million trees in a Climate Forest, improved connectivity, accessible woodland and urban tree canopy, and others.

128. The main impacts on trees and woodlands are historic clearance for agriculture, industry and settlement and consequent habitat fragmentation. Pressures include invasive species, pollution, climate change as well as continuing pressure for alternative land uses. Ash dieback is expected to cause significant tree loss across the UK including in East Lothian. The Council manages trees on its own land working on a priority sites which could be a health and safety hazard. The draft Tree and Woodland Strategy contains a proposal for a landscape scale plan for replacement of ash.

129. Trees in urban areas are important for many reasons, including placemaking. The Tree and Woodland Strategy for East Lothian aims to achieve a canopy coverage of 30% within settlements. Many of our settlements are or include Conservation Areas. Trees within such areas require prior notification of any works to the Council. Trees are often an important part of the historic character of such areas. Important trees in Conservation Areas will be identified in Conservation Area Character Appraisals as these are produced. The existence of important trees may influence Conservation Area boundaries.

130. NPF4 Policy 6 provides that development will not be supported were it results in:

- any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition;
- Adverse impacts on native woodlands, hedgerows and individual trees of high biodiversity value, or identified for protection in the Forestry and Woodland Strategy.

Ancient woodland over 1 ha was identified by NatureScot in the 1980s. The Tree and Woodland Strategy contains an action to map smaller areas; mapping of trees on early maps carried out in association with the National Library of Scotland will assist with this. Ancient Woodland is now given a high level of policy protection through NPF4, as well as the Control of Woodland Removal Policy which limits the circumstances where this can be removed. Some ancient and veteran trees have been mapped by the Woodland Trust, however, there are thought to be many that have not. Some of these trees may not have protection from felling even if identified. The Tree and Woodland Strategy identifies native woodlands and other trees and woodlands which should be protected. Hedgerows are valuable but information on their location, type and condition is lacking. The Tree and Woodland Strategy contains an action to map hedgerows and produce a plan to conserve them.

131. Issues relevant for development in relation to trees and woodland include:

- Recreational pressures on woodland of high biodiversity value
- Hutting and tourist accommodation such as 'glamping' in woodland
- Woodland removal for development, including renewable energy proposals
- Climatic change altering species which can be grown, affecting landscaping
- Climatic change leading to more care being required in establishing tree growth
- Designing proposals to incorporate existing and new trees



The location of areas of woodland may influence the spatial strategy or sites that can be allocated for development.

## STAKEHOLDER INVOLVEMENT

### Online Survey

132. Responses overall showed support for woodland. 'Woodland Planting and Restoration' as a focus for the LDP Spatial Strategy was chosen by over half the respondents being one of the most popular choices (respondents could choose more than one option).

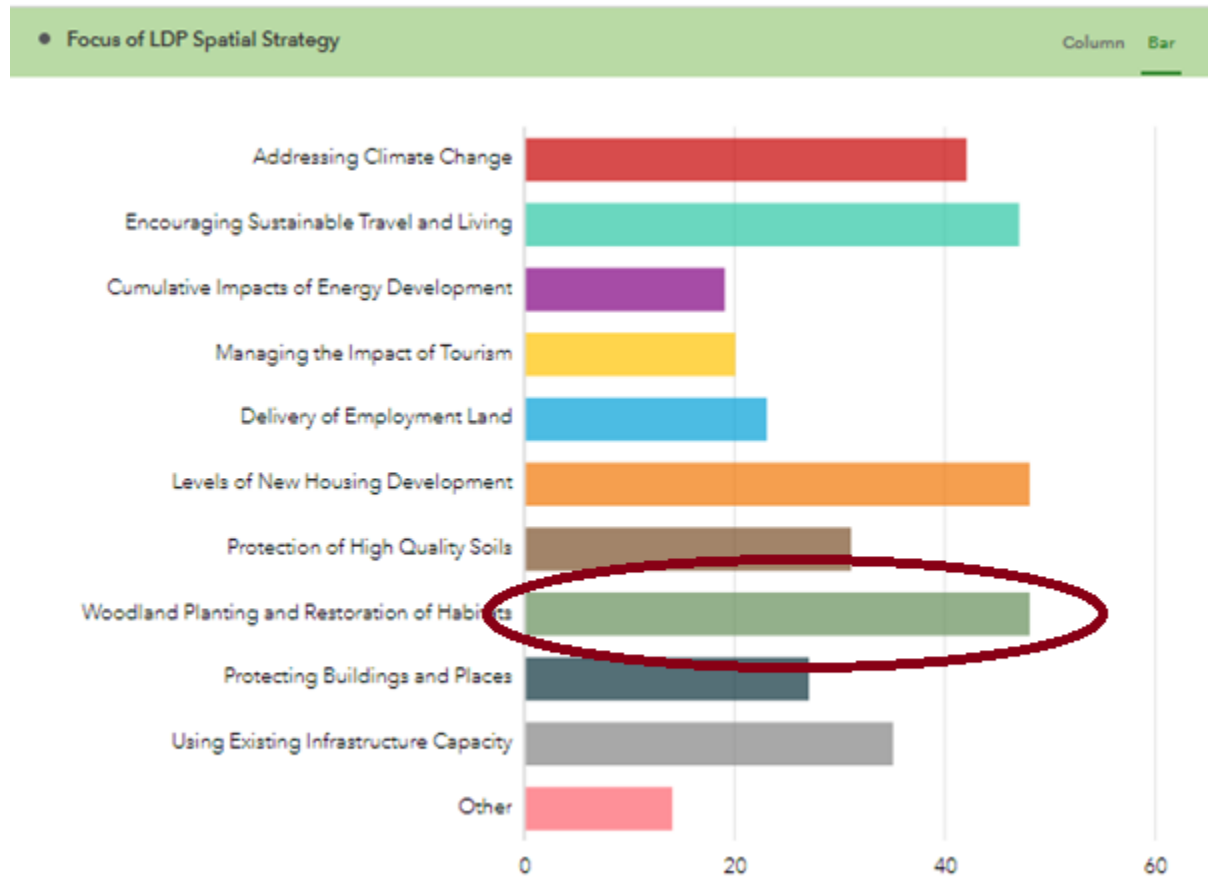


Figure 13 Responses to survey question on areas the LDP should focus on, number of respondees

133. General issues were raised with regard to increasing tree cover and protection of existing trees, as well as issues in relation to specific trees. Several respondents noted link between trees and climate change, and trees and health.

134. Comments were made seeking retention of existing trees, hedges and woodlands. This included that existing green spaces, woodland, woodland habitat and hedgerows should be protected and retained in general, that trees and hedgerows, in particular mature trees should not be cut down. One respondent mentioned deer management as an issue. Another made a comment 'this is a trickle crisis, so every hedge and tree belt matters.

135. In addition, comments were made about management of existing woodland.

136. Concerns regarding specific trees and woodland that merit protection/retention were:

- Musselburgh Flood Protection Scheme: produce a design for the Musselburgh Flood Protection Scheme that saves the trees
- Protect community (Dunbar) woodland from further housing incursion.



- The opportunity for land use south of the Gullane School & Recreation area - a full size football pitch and further woodland joining with that on south edge of recreation area
- The landscape in the eastern coastal plain is not sufficiently protected. It is very well preserved with historic settlements and farm steadings and the landscape and dark skies have very limited capacity to accommodate change. Woodland is under development threat in this area and the new station at East Linton will create development pressure in this area.
- The Hedderwick Estate and the Deer park.

137. Many respondents called for an increase in tree and woodland cover in general, and to increase connectivity, and as one of the roles for Countryside Around Towns area. New planting was sought: specifically mentioned were trees; native trees; small woodland areas near or in urban areas; trees and hedgerows as windbreaks; fruit and nut trees along boundaries close to and within town; and planting as part of a day trip activity. Comment was made that the LDP should identify space for community gardens/woodlands/orchards and encourage hedging rather than fencing. One respondent noted the link should be made between denser housing layouts and more space being available for agriculture or woodland. One respondent saw the LDP as having a role in encouraging appreciation of the impact changes can have, such as telling people the benefits of the trees local to them and the increased benefits of more and diverse tree planting.

138. Specific mentions of areas that could be used for tree planting were:

- “the path from Wedderburn down to the Esk and the vacant land between the path and the railway could be better used as a community woodland providing both trees to capture CO2 and activity space.”
- “restoring and expanding degraded policy woodlands, the myriad of extant designed landscapes”
- Dunbar - Hall Hill area: “roadside verges could be re-wilded and trees could be introduced to create greener networks and contribute to town shade and cooling”.
- The play park at Newhouse Street in Dunbar was described as dull, one of the suggestions to improve it was a few fruit trees.
- “A golf course south of Tranent would also create tree planting”
- “some formality could be re-introduced looking (forward!) to the 19C paradigm of park, considered plantings, large specimen trees and outstanding design”

139. Some respondents saw a role for woodland in reducing recreational pressure on the coast. One comment was that use of existing and new woodland trails would get people away from coast, though another considered that people were already ‘cramped into over used areas of woodland and coast’.

140. Several comments were made on trees and new housing development. One noted that new housing developments should have high standards in terms of conserving existing trees and hedges on sites and of creating green spaces including tree planting, while other comments called for more trees, scrub and woodland as part of development, with large developments to have space for community gardens or orchards. One considered that there was a lack of joined up greenspace, including new woodland, in new housing development, increasing pressure on existing sites that many drive to

141. “Consideration of trees in new housing areas is inadequate, with dead tree avenues, non existent garden design (a few stunted laurel hedges) let alone standard or specimen trees, with more space for cars than garden”

142. Climate issues were raised, with a call for the use of native plants alongside climate resilient planting and bird and bat boxes onto retained trees. Another wanted to see tree planting in residential areas to provide shade and lower temperatures as in continental towns.
143. Maintenance was also raised as an issue, to make sure trees expected under development conditions are actually planted and looked after.

### Place Standard – open consultation

144. At Dunbar a comment was made that there are few trees in the main town.
145. At Musselburgh tree planting in the High Street was suggested to encourage walking and reduce pollution.
146. At North Berwick a call was made to increase the number of trees and shrubs within town to adapt to climate change and keep town cooler. Tree planting in streets was also called for. There was also a suggestion to develop trees and small coppices as ‘play trees’ as part of space for natural play. Trees in open spaces in Dirleton were also noted as something that is good now.
147. Issues with trees or bushes overhanging paths, blocking sight lines for vehicles and causing damage to cycle paths through root growth were also raised in various places.

### Events

148. A person noted they were looking to expand their sawmill business. They suggested that the best location for this would be in a woodland location, such as Saltoun Wood. Several attendees called for the Flood Protection Scheme to keep the trees at Mall Avenue, and not to remove trees for the Musselburgh Flood Protection Scheme in general.
149. Another asked for retention of existing trees and shrubs.
150. *Post its*  
 “Retention of existing trees and habitats”  
 “Queens Green Canopy tree planting” post-it at Winton Estate  
 “Climate Forest Tree Planting”  
 “Local improvements to housing areas at North Berwick creating green spaces, trees, growing spaces”

### Primary school engagement

151. Children often mentioned trees: they were concerned that trees are being cut down, and there is a desire from children to plant more trees, ensure they are looked after and protected. Children describe this as important for wildlife, for us and to help climate change.
- “More trees, you should plant the seeds now.”* Child at Longniddry Primary School
- “Help trees so don’t cut them down try to help them grow. The other reason you shouldn’t cut them down is you’re destroying animals’ homes. You need to help other people look after trees. You should plant more trees around Scotland as lots of them are getting knocked down.”* Child at Dirleton Primary School



Figure 14 'Help trees' by child at West Barns Primary School

## Secondary School engagement

152. Young people rated the “Nature – parks, woods, hills and beaches” element highly in the Place Standard. The responses are not broken down into woods in particular. ‘Places to Go’ section in Dunbar Grammar noted a walk in the forest as a place to go. Several of those involved in the discussion of Nature at Rosehill secondary school expressed concern about the number of new houses that were getting built on what they thought were forest or green areas, where they liked to hang out.
153. Parks and/or woodland were the second most popular choice for where young people said they preferred to hang out with friends, and that they liked about the area they lived in. Again this is not broken down between parks and woods. Planting trees was given by some as a response. A specific comment was ‘stop cutting down the woods... to build houses’.
154. Woodland lighting was mentioned in response to the question ‘is there anything we could do to make it safer or easier to walk, wheel or cycle to places you want or need to go’.

## Tree and Woodland Strategy Consultation

155. Consultation on East Lothian’s draft Tree and Woodland Strategy was carried out at the same time as consultation on the Evidence Report. A draft Report on Consultation was prepared and is intended to be presented to a Cabinet meeting on 8 May 2024 (<https://www.eastlothian.gov.uk/meetings/committee/5/cabinet> ).
156. Themes from this consultation were concern over loss of trees to particular development proposals (there were three controversial schemes at the time of the consultation); that woodland was overused; that new housing development was lacking in trees and green space, with small garden areas, reducing the attractiveness of the area and privacy for residents. Linked to lack of trees and woodland in new development was how new development affected the appearance of the rural area, as new housing sites are often on the edge of settlement. Lack of tree canopy coverage in urban areas was also raised, with a link made to adaptation to climate change.
157. Access to woodland was also raised, including for people who are disabled or do not have access to a car.
158. One respondent mentioned hutting, saying that woodland should not be parcelled up and dotted with sheds, tracks and vehicles. There was also support for trees for food production, both in gardens and orchards. Fire risk from an increase in woodland, including in urban areas, was raised. Several mentioned that a whip (a very young tree) is not a replacement for a mature tree.

159. One small business was looking for more local sawmills that subscribe to ASHS (specifically hardwood). Also there was one suggestion of creating a wood industry industrial area where many woodland industries can come together to work together and reduce the need for travelling i.e. the sawmill supplying timber to the artisan timber maker, furniture maker, and shed maker, with waste being used by green waste manufacturer.

## WHAT THIS MEANS FOR THE PROPOSED PLAN – Forestry, Woodland and Trees

160. The LDP should take into account the East Lothian Tree and Woodland Strategy, and reflect and support the spatial elements. This includes retention of existing trees, woodland and hedges, especially those of high biodiversity value, and expansion and improved connectivity of woodland. The value of trees for climate issues, both to offset carbon emissions and to adapt to coming climatic conditions, is recognised. The Control of Woodland Removal Policy requires replacement planting. There may be a role for the LDP in identifying potential sites for this with reference to the Tree and Woodland Strategy.
161. Stakeholder consultation suggests that trees and woodland are valued, including by children and young people, and that the NPF4 policy intent of protecting and expanding forests, woodland and trees is supported. Issues include a perception that trees are not protected in development, and that new development does not adequately provide for them.
162. The LDP should take the approach in the mitigation hierarchy as set out in Figure 1 for trees and woodland with biodiversity, carbon sequestration or other value. Firstly, this means avoiding impact. Identification of valued trees, woodland and hedges may help with this. The Tree and Woodland Strategy and LBAP will support this. The LDP should then consider if policy or guidance is needed to help minimise impact. Restoration and offsetting should then be considered.
163. The LDP could consider are how trees and woodland are treated in both new and existing development, including housing development, and how to accommodate large tree species in particular. When, where and what type of replacement planting is carried out when trees are lost to development should be considered. The tree canopy coverage of some areas is low. Lack of tree canopy can be a particular issue in more deprived areas. The LDP should consider ways of addressing this, including potentially canopy coverage targets in new development and incorporating trees into design generally.
164. Access to local woodland is limited for some communities. Improving this is an aim of the draft Tree and Woodland Strategy. The LDP should consider ways of addressing this including through creation of new woodlands or treed areas as part of development and / or improving active travel connections to existing and new woodlands. Access for disabled people should also be considered.
165. Improving woodland connectivity is important to improve the biodiversity, landscape and recreational value of East Lothian's woodland overall and the LDP should consider how this can be promoted, in tandem with other habitat networks. Ash dieback is likely to bring significant landscape change, and also affect habitat connectivity. Both the extent and condition of woodland in the area may be affected. The LDP should consider how to address this through Nature Networks.
166. Current policy means that normally woodland areas would be avoided in allocating development sites. The location of new development allocations in relation to connectivity of

woodland and future forest fire risk should be considered. Improving access to existing and new woodland via active travel connection is also an issue.

167. Changing climatic conditions means increased maintenance is now needed for tree establishment than previously. Maintenance of planting schemes is therefore more of an issue than it was.

168. The issue of hutting within woodland, especially woodland of high biodiversity value, should also be considered.

## AREAS WHERE THERE IS AGREEMENT OR DISPUTE – Trees and Woodland

169. Some comments were received suggesting different levels of protection for trees and woodland however there was no dispute over the evidence. There was overall agreement on the need to protect and expand the level of woodland cover, both in urban and countryside settings.

## Blue Green Infrastructure (NPF Policy 20)

### NPF4 Policy 20

LDPs should be informed by relevant, up-to-date audits and/or strategies, covering the multiple functions and benefits of blue and green infrastructure. The spatial strategy should identify and protect blue and green infrastructure assets and networks; enhance and expand existing provision including new blue and/or green infrastructure. This may include retrofitting. Priorities for connectivity to other blue and/or green infrastructure assets, including to address cross-boundary needs and opportunities, should also be identified.

LDPs should encourage the permanent or temporary use of unused or under-used land as green infrastructure. Where this is temporary, this should not prevent future development potential from being realised.

LDPs should safeguard access rights and core paths, including active travel routes, and encourage new and enhanced opportunities for access linked to wider networks.

NPF4 Definitions	
Green infrastructure	Features or spaces within the natural and built environments that provide a range of ecosystem services.
Blue infrastructure	Water environment features within the natural and built environments that provide a range of ecosystem services. Blue features include rivers, lochs, wetlands, canals, other water courses, ponds, coastal and marine areas including beaches, porous paving, sustainable urban drainage systems and raingardens.

170. East Lothian is a wonderful area for enjoyment of the natural environment, both within its towns and villages and in the wider countryside and coast. Attractive parks, open spaces and



play facilities are a key component of East Lothian’s Green Networks. The Core Path network and rights of way, as well as cycle paths, provide opportunities to explore the scenic coastline, heritage attractions and the countryside. The natural environment, and access to it, are major factors in the quality of life of residents and workers here, as well as attracting visitors here.

171. Both blue and green infrastructure elements provide a variety of ecosystem services. Ecosystem services are the contribution of ecosystems to human well being and quality of life. Some of the benefits can be taken for granted or undervalued because they are freely provided. This does not reduce their importance.

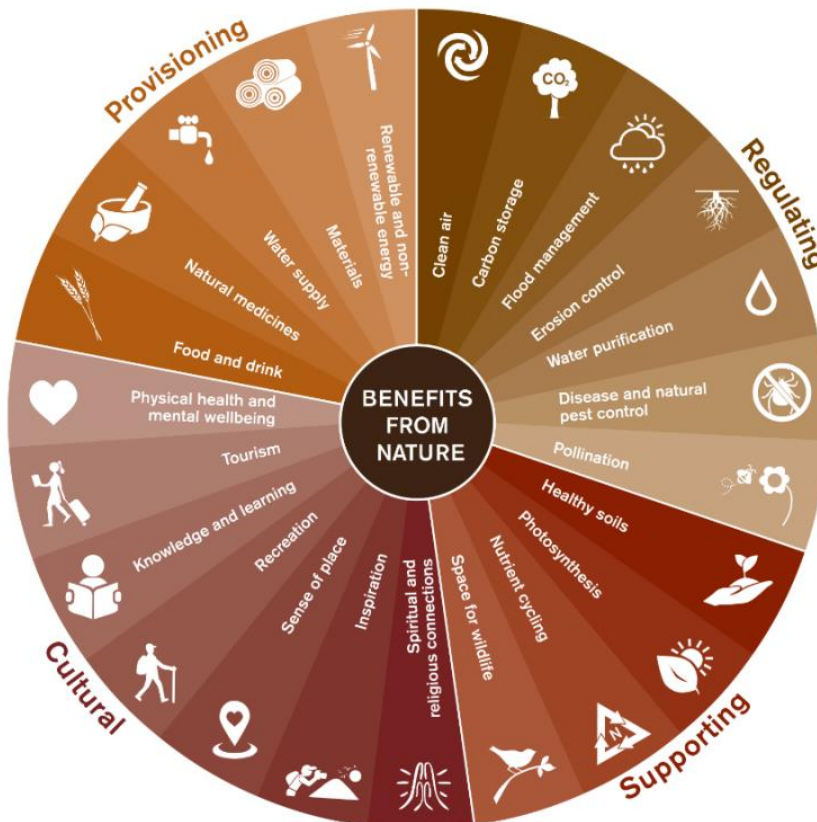


Figure 15 Ecosystem services (NatureScot)

## EVIDENCE - Blue Green Infrastructure

### Blue Green assets

172. East Lothian is part of the Central Scotland Green Network. This is a National Development designed to restore nature at scale and act as an exemplar of green infrastructure in placemaking. It will provide multiple benefits for health, biodiversity, and mitigate and help us adapt to climate change. Action should continue to focus on areas where community wellbeing and resilience would benefit most. East Lothian Green Network Strategy sets out the main aims for implementing the Central Scotland Green Network in East Lothian. The Strategy identifies Green Network assets including active travel routes, outdoor recreational destinations, areas with landscape protection and areas with existing valued habitat. It sets out a series of aims and tasks to achieve them.

173. The Tree and Woodland Strategy identifies areas of existing woodland, including woodland of high nature conservation value. It includes targets and actions some of which relate to blue/green infrastructure and networks, including riparian planting. Functioning riparian corridors can help increase the resilience of a place to the impacts of climate change and help address the nature crisis, providing environmental benefits, and a wide range of public services.
174. NPF4 includes an instruction to LDPs in Policy 20 that ‘the spatial strategy should identify and protect blue and green infrastructure assets and networks’.
175. Identifying Blue-green infrastructure is likely to include consideration of:
- Blue-green assets identified in the existing Green Network Strategy and Tree and Woodland Strategy
  - Open and play spaces identified in the Open Space Strategy and Play Sufficiency Assessment
  - Sites designated for biodiversity, geodiversity or landscape reasons
  - Habitat that sequesters carbon including peatland, saltmarsh, woodlands
  - Allotments and community food growing spaces
  - Flood plains
  - SUDS features
  - Lochs, reservoirs and ponds
  - Riparian and coastal areas
176. Blue Green Infrastructure assets and networks will be mapped as part of the Local Development Plan.

### Open Space Audit and Strategy

177. Open spaces in East Lothian play a critical role in the life of a community, providing a range of facilities and places for quiet reflection, physical activity, sport and fun. The multi-use nature of our open spaces can meet many local community needs close to where people live, and bring economic benefit to the area through tourism. Open spaces can be used for sport, children’s play, relaxation, education and can provide a place for local events. They also often form a central element of an area’s character.
178. The Open Space Audit and Strategy were carried out to investigate provision and improve it where it was lacking. This is in the process of being updated. The Open Space Audit of 2009 on which the Open Space Strategy was based looked at 303 open spaces (parks, amenity greenspace, playspace, green corridors, semi-natural green space, allotments and golf course) and sports pitches. A further 44 open spaces were audited in 2016. The majority of these sites were managed by the Council.

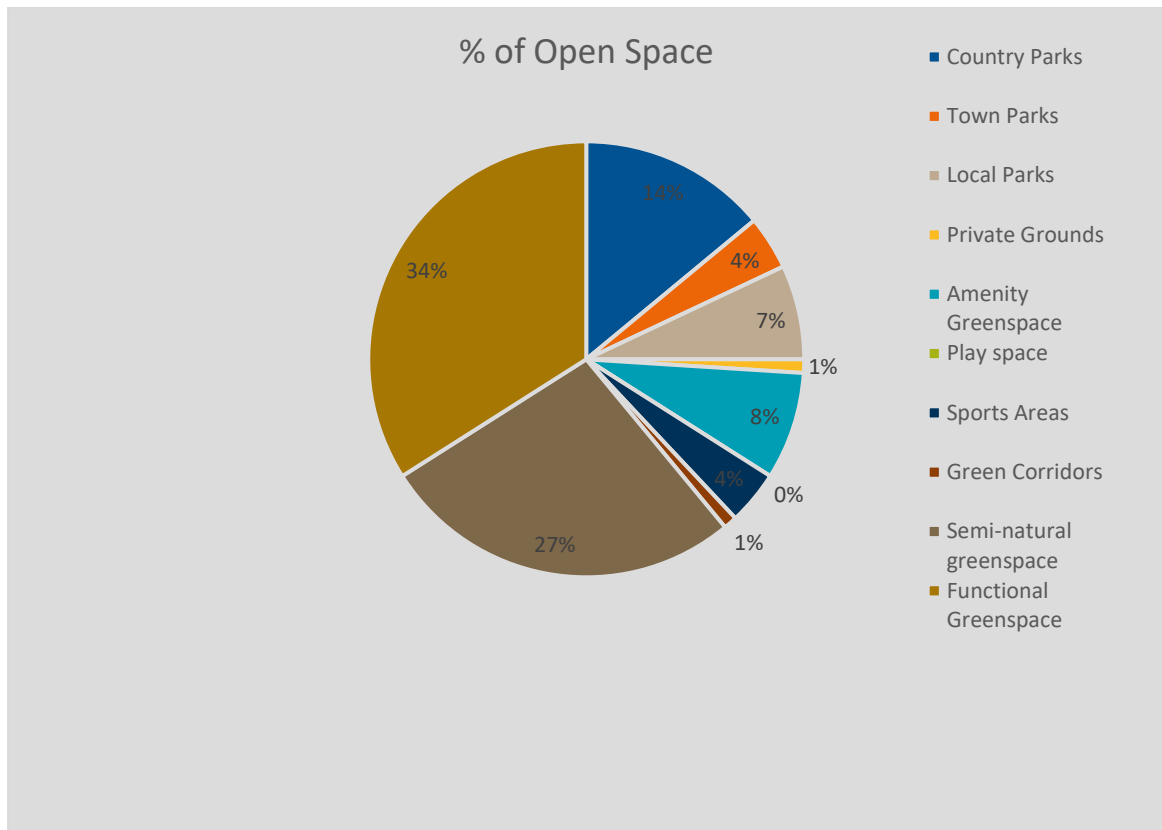


Figure 16 Proportion of open space, by type

179. Open Space Standards bespoke for East Lothian were developed, benchmarked with other local authorities. The standards assessed quantity, quality and accessibility. The quantity standard seeks to assess if there is enough open space and if it is equitably distributed. All settlements should aim to have 60m<sup>2</sup> of Open Space and Play Provision per household (including public parks, amenity greenspace, and play space). The quality standard seeks to assess if the open space is 'fit for purpose', with all communities to have access to high quality open space. Accessibility standards for distance of settlements to a country, town and local park, regional athletics facility, sports pitch, green network and play areas were also included. The standards help the council to take a consistent and transparent approach to open space provision. They allowed planners to identify when developer contributions should focus on quantity, quality or accessibility, and whether on- or off-site provision was appropriate.

180. The audit found that in terms of quantity of open space, all clusters bar Tranent, at 53.73 m<sup>2</sup> per household, met the standard. All settlements met the quality standard overall for parks, though some individual parks did not. Most residents lived within 1.2 km of a park.

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

Figure 17 Extract from East Lothian's Open Space Strategy: Summary of assessment with regard to quantity, quality and accessibility of open space by cluster

181. The Open Space Strategy 2018 has 8 strategic objectives. These reflected the key policy areas to be addressed over its lifetime in relation to the provision and management of open space. These were:

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

182. Play Sufficiency Assessment was undertaken to look at formal outdoor play provision. This is discussed in the [xx] section.

### Core Paths and Access Rights

183. The [Core Path Plan](#), developed after extensive community consultation, was adopted in 2010, mapping over 331 km of routes. Since then over 6km of 'aspirational' routes have been

built. These routes, along with traditional rights of way, give good access to a variety of landscapes and scenery.

184. The Land Reform established a right of responsible, non-motorised access to most land and inland water in Scotland. This right is for crossing land, or going onto land for recreational or educational purposes. This is a right of non-motorised access, so covers walking, cycling, horse-riding, wheeling and canoeing, but not car access. The Act allows wild camping. The Act also requires land managers to respect access rights. This has led to challenges in some areas, which is apparent in particular in the summer, with considerable pressures arising during the Covid-19 pandemic on beaches and countryside sites.

### Unused or under-used space

185. Vacant and Derelict land consists of unused land, as well as land or buildings that need to be remediated before development could occur. These sites can affect the overall appearance of an area, as well as impacting those who live nearby. The council must report on areas of vacant and derelict land over 0.1ha in size to the Scottish Government. The following table shows the amount of vacant and derelict sites on the register in East Lothian in comparison to the rest of Scotland. East Lothian is broadly comparable with the rest of Scotland.

	Vacant and Derelict Land 2023 (ha)	Land Area (ha)	Percentage land on Vacant and Derelict Land Register
East Lothian	82.81	67910	0.1219%
Rest of Scotland	9429.34	7723090	0.1221%

186. The largest sites are the former Cockenzie Power Station (two parcels of 19.5ha and 12.4ha) East Fortune Hospital 13.9ha, Tynemount Bing 6.9 ha, Edenhall Hospital 5.4, East Fortune Steading 3.4 ha, Cockenzie electricity distribution site, 3.2ha, and Phantassie Steading 2.27ha. There are a further 23 sites between 0.1 and 2 ha. There are sites below this size also, some of which are shown on the Buildings at Risk Register [https://buildingsatrisk.org.uk/search/planning\\_authority/195](https://buildingsatrisk.org.uk/search/planning_authority/195)

187. The Green Action Trust reports that almost a third of Scotland's population lives within 500m of a derelict site, rising to 55% for deprived communities. In East Lothian in 2022, 12644 out of 55279 addressable properties were within 500m of a vacant or derelict site, just under 23% of addressable properties (not all of which are homes) overall were within this distance, rising to 39% within the lowest three decile SIMD areas.

188. There is likely to be some biodiversity value at many of these sites. Brownfield sites and empty buildings can have varied habitat at a small scale, which encourages diversity. Some of these sites are re-naturalising themselves, especially around the margins. The Council owns some of the sites including at the former Cockenzie Power Station, which has recently received levelling up funding for site preparation. Climate Evolution provided a high level vision for the Blindwells/Cockenzie area, which includes this site This included some woodland creation at the former Cockenzie Power Station site. Wayleaves for electricity pylons may in practice act as a constraint to this.

189. While there is likely to be some biodiversity value at many of these sites, they may not all be suitable for public access, whether because of ownership, safety or access concerns.

### Beaches, the coast and water based recreation



190.

191. East Lothian is well endowed with beaches, which are a valued recreational resource, whether for play, swimming, walking or just relaxing. Bathing water quality is monitored by SEPA at Fisherrow, Seton Sands, Longniddry, Gullane, Yellowcraig, Broad Sands, North Berwick West, North Berwick Milse Bay, Seacliff, Dunbar (Belhaven) Dunbar East, Whitesands and Thorntonloch. Some of the bathing waters are at risk from short term pollution from combined sewer overflows following wet weather, agricultural run off and/or diffuse inputs.

192. Foxlake, Musselburgh lagoons and the Whiteadder Reservoir also provide for recreation on inland waters. There is also recreational angling inland in particular on the River Tyne, as well as sea fishing around the coast.

### Riparian Areas

193. Rivers within East Lothian are important for Nature Networks, connecting through landscapes and urban areas. They can also be important recreational assets. River classification information is published by SEPA. This shows that while only one stretch of river is in the lowest category of 'Bad ecological potential' (the East Peffer) there are many classed overall as 'poor', and few overall as 'Moderate' or 'Good', mostly in the east of the area. None were classed as 'High'. The Tree and Woodland Strategy for East Lothian contains a target for improving woodland coverage around rivers. A balance between open and wooded areas helps maintain river temperature and improves the ecology of the watercourse.

### SUDS

194. Sustainable Urban Drainage Systems were intended to be an alternative to removal of surface water from a developed area via the sewerage system. They aim to protect from flood risk by avoiding more water leaving a site during rainfall than before the site was developed. At their best they can provide an attractive feature, adding to the biodiversity and recreational potential of the area. The Council has produced Supplementary Planning Guidance on SUDS with the aim of improving their design.

## STAKEHOLDER INVOLVEMENT – GREEN BLUE INFRASTRUCTURE

(see also comments on Nature Crisis/Biodiversity/Natural Places above)

### Musselburgh Flood Protection Scheme

195. During the LDP Evidence Report engagement, proposals for a Flood Protection Scheme in Musselburgh were also being developed.

196. Numerous comments were made about this scheme, both at events and through the online survey. These were based on the proposed Scheme's design at the time the LDP Evidence Report was carried out. The comments on the perceived adverse impact of the design of the proposed Scheme (as it then was) included loss of an opportunity to be in the vanguard of nature based solutions to flood risk; that the design will deter people from walking along the river, to the detriment of their health and wellbeing; that landscape, the beauty of the area, East Lothian's climate footprint and biodiversity will be adversely impacted; that the level of risk being protected against is too high; that a whole catchment approach is needed. Several called for a pause to the scheme to allow for full consideration of nature based solutions.

197. Musselburgh Flood Protection Team are working on a scheme design. The most recent outline design has incorporated public feedback from their separate consultation and reduced the number of trees required for removal. In January 2024, the Outline Design was approved to move to the Statutory Approval Phase. An Environmental Impact Assessment (EIA) has been undertaken and will be published in March 2024; this has identified and outlined a re-planting requirement and identifies potential areas of re-planting. Sustainable flood risk management in the upper catchment has been considered and incorporated into the scheme. In October 2023, a motion was passed by East Lothian Council which approved the two outcomes below – both of which are advancing;

- “That further investigation of the potential for Natural Flood Management is advanced through the processes of the Local Risk Flood Management Plan (for the Forth Estuary);
- “That East Lothian Council works to establish a new independent body for the river Esk catchment that will be capable of advancing both natural Flood Management and Nature-Based Solutions.”

198. A decision on this matter will be made under flood protection legislation, and any spatial consequences of the proposal reflected in the proposed LDP, where appropriate.

### Water Quality of groundwater, watercourses and waterbodies

199. Not many respondents specifically mentioned water quality. However there were calls for creation of wetland areas, both at the coast to mitigate against rising sea levels and to protect coastal communities, with the creation of new lagoons, and as part of priority areas for conservation and rewilding in expanded Countryside Around Towns areas. The green space along rivers and coasts was noted as needing protected and not subject to housing development. Marine habitats (saltmarsh & seagrass beds) was noted as important for carbon sequestration.

200. Respondents raised flooding issues, and the desirability of working with nature to manage both flood risk and sea level rise in general as well as in relation to the Musselburgh Flood Protection Scheme issue. This was seen as having significant benefits for biodiversity. One respondent noted that the funding inducements on offer encourage a disjointed approach that is often in direct contravention of the current LDP. Flood risk was seen as increasing with climate change, and it was noted that we need to be better prepared for flood risk.

201. The undesirability of building, housing in particular, on flood plains was raised.

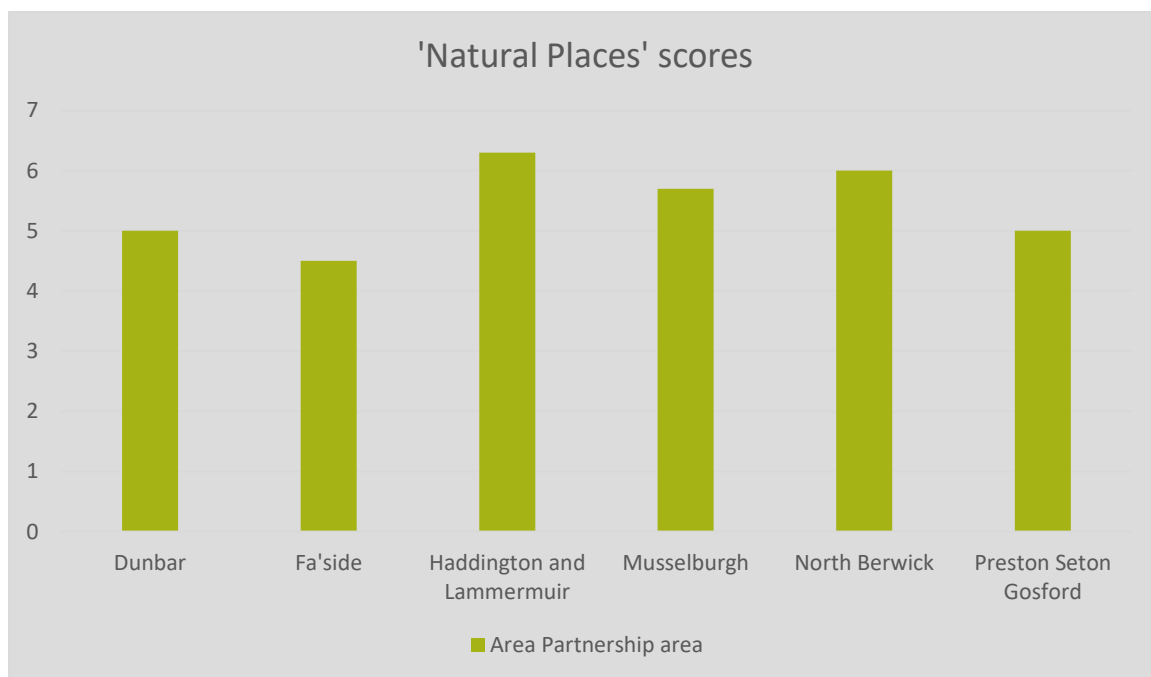
202. There were calls to restore river habitat, including on the Esk in relation to the Flood Protection Scheme.

203. One respondent saw a need to identify new areas to buffer rivers and streams, to restore natural functioning ecosystems at a catchment and landscape scale. A landscape approach to restoring watersheds, with regeneration of natural habitats and creation/restoration of wetlands – potentially alongside reintroduction of beavers – would benefit from a demonstration project, such as the area to the east of East Lothian between Dunbar and Dunglass. The riverine objectives there are clear, with potential for coastal restoration also.

204. A few respondents noted sewage issues, which is both an infrastructure and water quality issue. There were suggestions on use of grey water, and incorporating this into design as treated water becomes an increasingly precious resource; for example, all houses with gardens have water butts as standard, and rain water collection used to flush toilets.

## Place Standard – open consultation

205. The Place Standard includes a score for 'Natural Space'. The following scores were an average of those given by respondents in each Area Partnership area. The highest possible score would be 7. The chart below shows the average of responses for each Area Partnership Area for the Place Standard's 'Natural Places' theme. The Haddington area was given the highest score, followed by North Berwick area. Fa'side was the lowest, followed by Preston Seton Gosford. Both of these latter areas include areas with the highest levels of deprivation in East Lothian.



206. Place Standard - Dunbar and East Linton Area Partnership area In Dunbar, some improvements to paths was wanted, including better access to the coastal path, and widening the road and footpaths from town along Spott Road. More cycle parking on Dunbar High Street was also sought.
207. Comments were made calling for a better range of open spaces with good access, in particular gathering space in the town, new spaces for dog walking within walking distance to compensate for areas lost to house building (Deer Park). A comment considered there to be many underused green spaces, which could be made into formal parkland or encouraged to grow as grass meadows. Experience of nature is diminished by “chemically adulterated astroturf and anaemic green sward”.
208. At **East Linton** on active travel, a comment was made that the roads are fairly quiet or it's easy to find a quiet route. The John Muir Way (a long distance path) was seen as good initiative. Another noted the ease of access to the countryside or to go for a leisurely bike ride. However a comment was also made that country roads are not that safe for cyclists, and that more cycle paths are needed. Maintenance issues included that the A199 cyclepath is poorly maintained and that pavements had been damaged by recent infrastructure works.
209. On open space, several comments were made regretting the possibility that park space could be lost to provide a new school. A call was made to ban dogs from the local park and playing fields.

210. At **Spott** comment was made that there are no safe roadside walking routes, with hedges lining the roads not being trimmed and drainage issues in parts.

### Place Standard - Fa'side Area Partnership area

211. Comments received requested confidentiality.

### Place Standard - Haddington and Lammermuir Area Partnership area

212. No comments were received from Haddington town.

213. At **Garvald** there was a call for improved rural cycle routes.

214. At **Humbie** a comment was made that open spaces were all good, as was provision for play and recreation.

215. At **Athelstaneford** comments were made that there were generally good paths for walks. Pavements in the village could be improved though. There was a comment 'no cycle paths' though unclear if they wanted them or not. On open space comments were made that both the park and the stream close to the village could be improved (one comment noted this was being taken forward by residents). The refurbishment of the tennis courts was appreciated.

### Place Standard - Musselburgh Area Partnership area

216. At **Musselburgh**, comment was made that the pavements were often too narrow with too few crossing points. While one comment considered the roads not good for cyclists, another considered there were good cycle routes east to west through town and along Esk and then to Queen Margaret University. Segregated cycle paths and wider pavements were called for, as well as better linked foot and cycle paths.

217. On open space, comments were made that access to green space was good, though comments also said this could be improved. Numerous spaces were mentioned as being high quality: the beach/promenade/harbour, Levenhall links/lagoons, the River Esk and riverside paths, Inveresk Lodge Gardens, Musselburgh Race Course, golf course and Lewisvale Park. The new hides at Levenhall were noted as being good to engage with nature. Newhailes was also noted as being good including for dog walkers. Wildlife attracted to lagoons, beach, river were noted as being a huge asset to Musselburgh.

218. Areas noted as having potential for improvement were:

- Fisherrow harbour has could be a gathering place for recreation for all ages. An opportunity for outdoor seating and a kiosk selling coffee and cake?
- the area by Lidl and Aldi; this should be re-thought to make it feel more welcoming,
- Hope Place (maintenance issues)
- the riverside behind the High Street shops
- green areas by River Esk
- Seafront – make it more of a leisure focus for the town, it feels really forgotten and hidden.
- High Street – line with trees and remove some of the impermeable surfaces to create more space for planting.
- bottom of Newbigging and other such areas – make into bioswales to alleviate flooding
- Levenhall links track surfaces need improved

219. Maintenance and accessibility of natural spaces generally was mentioned. Issues of pollution and invasive species of the Esk were also noted. There was a call to return the river to a more natural state, slowing the flow and removing barriers to alleviate flooding and encourage wildlife.

220. More opportunities for community food growing were also sought to meet demand. A comment was also made about not permitting development which blocks views up to St Michaels Kirk from the river such as the Wireworks.

221. There was a call for increased focus on promoting biodiversity and consideration of climate change in natural spaces, as well as consideration for how to make them more welcoming.

## Place Standard - North Berwick Area Partnership area

### North Berwick

#### Moving Around

##### *What is good now?*

- Access to the beaches, the Lodge grounds, the golf courses. NB is close to being a 20 minute community.
- The cycle paths to North Berwick and to Aberlady are good but one to Drem is sadly lacking still.
- wide footpath/pavement/cycle way
- Most areas of NB are easily accessible by foot and generally pleasant to walk
- 20 mph speed limit has made the roads feel MUCH safer for cycling and walking.
- Green spaces are very valuable - Coos Green, Castle hill, Lodge, the Glen, North Berwick Trust Park, recreation ground, golf courses.
- Sports facilities are good in general
- John Muir path and cycle paths from North berwick to surrounding countryside
- Good paths, and close proximity to the countryside, beach and parks.

##### **222. How could we make it better in the future?**

- More places to lock up bikes around the town, eg. at the seafront.  
Increase the number of trees and shrubs within town to adapt to climate change and keep town cooler.
- better sports facilities for the school, and use the educational designated land for playing fields.
- Manage more public access on the golf courses (using them during Covid for walking and cycling was great)
- Many of the paths need cutting back of overgrown bushes, particularly the one that runs along the School.
- Better pavements too many trip hazards not just in high st.  
The pavement area on Haddington Road gets covered with wet leaves in Autumn and becomes treacherously slippery.
- Walking paths aren't clearly signed or maintained, uneven and many inaccessible for less able bodied people. Usability for walkers, cyclists and motorists is very variable and parking is extremely poor across the town creating havoc for walkers and cyclists. No big picture plan for a solution that's effective for all.
- More cycleways
- Navigating through North Berwick by bike is not easy for all ages and levels of cyclists.
- Widen pavements in High Street



## Streets and Spaces (North Berwick)

### 223. What is good now?

- Harbour is looking great
- Planters and hanging baskets in NB High St
- Improved seating area outside police station - reclaimed from parking spaces
- Clean, no graffiti, no no go areas although the Lodge Grounds potential for antisocial behaviour at points
- Bright and cheerful and in particular work of North Berwick in Bloom incredible planting
- Generally attractive all round
- NB has many landmarks - the beaches, Islands, Law and a town centre and seafront that is attractive and full of history. G
- Natural beauty and history of the town is exceptional
- Open spaces such as North Berwick Law, Lodge Grounds, NB Trust Park, beach.

### 224. How could we make it better in the future?

- Ban camper vans from parking in town centre and Milsey Bay and spoiling views and peace of beachside walks
- Ensuring nature corridors and no further erosion of quality of life eg no removal of biodiversity areas, ensuring ongoing tree planting and natural planting including encouraging wildflowers and minimising use of pesticides and insecticides eg parks, green space and golf courses. Work needed with public services and commercial enterprises who have control of outdoor spaces to ensure value, protection of green spaces and their ongoing enhancement
- Open green spaces should be protected so there is no threat of being turned into a car park or developed.

## Natural Space (North Berwick)

### 225. What is good now?

- NB is a wonderful place to live because of its position and environment
- Lots of attractive open spaces
- North Berwick, the beaches, the Law and surrounding land, NB Trust park
- Improved cycle paths from North Berwick to surrounding countryside.
- Very easy as we are situated close to countryside, parks and the beach.
- East access to beach, parks and golf courses, coastal walks and countryside
- Well-kept green spaces in North Berwick
- North Berwick Trust parkland

### 226. How could we make it better in the future?

- Start by all of you reading the ELC Climate Change Strategy and getting on board with the nature crisis.
- Find ways to increase biodiversity - doing well but keep doing it and increasing.
- There is a lot of herbicide spraying that could be reduced.
- Make places for hedgehogs
- Remove rabbit fences at North Berwick Trust Park to allow hedgehog access to the copses
- Make visitors respect the lovely place

- All green spaces should be protected so there is no threat of being turned into a car park or housing development.
- Manage all greenspaces for wildlife and biodiversity (including reduction in use of glyphophate).
- Factors responsible for open green spaces in housing estates should also be instructed to manage greenspaces for biodiversity and to consult with residents as to what they would like - they need to be made accountable to residents and the council.
- Reduce traffic; Eliminate sewage overflows into the sea
- Sort the traffic flows before this adversely impacts these beautiful spaces which it will if unchecked.

## Play and Recreation (North Berwick)

### 227. What is good now?

- good sports facilities, new skate park
- Good provision for sports and play areas
- Range of opportunities and services
- Developments such as new skate park
- All good due to location in close proximity to the countryside, parks, beaches and the town centre. All walking distance
- Nb exceptional for activities for all aged
- Beach

### 228. How could we make it better in the future?

- implement a pump track
- develop trees and small coppices as 'play trees' - spaces for nature play/den building/looseparts play. Not too organised but designed for children to have a space in nature.
- Speed up development of pump track and provide basketball court
- Are all sectors of our community able to access recreation / spaces
- How can we ensure places where everyone can come together in the community
- Lack of public toilets less disgusting ones
- Nothing for young people
- make exercise affordable for all especially in current cost if living crisis, make it free if necessary in next few years to keep users healthy.

## Social Interaction (North Berwick)

### 229. What is good now?

- pleasant public spaces

### 230. How could we make it better in the future?

- More places for young people to gather

## Identity and Belonging (North Berwick)

### 231. How could we make it better in the future?

- Some potential trouble hot spots such as the Lodge Grounds after dark. Some concerns re anti-social behaviour eg Halloween and Bonfire Night. Need to ensure stronger community policing presence to prevent escalation in such incidences and resulting changing perceptions of safety within town which would have very negative implications for quality of life and reputation of town
- Invest in more Big Belly bins to prevent seagulls causing littering and becoming nuisances to people leading to unwelcome attacks
- The better the environment looks the less likely it is to become unsafe

## Care and Maintenance (North Berwick)

### 232. What is good now?

- North Berwick in Bloom won the Gold Medal for best coastal town in the UK which reflects the attractiveness of the town (and the hard work of this voluntary group)
- Nice plants and green space well maintained
- NB in bloom and EL parks team do a fantastic job between them.

### 233. How could we make it better in the future?

- Greater focus on native species and planting for biodiversity
- Start by all of you reading the ELC Climate Change Strategy and getting on board with the nature crisis.
- Otherwise ELC carry out several consultations to get public opinion on future policy and strategy which is good but it is not clear how much these agreed policies and strategies are then paid sufficient attention to (eg climate emergency and nature networks)

## Gullane

### Moving Around (Gullane)

#### 234. What is good now?

- Pavements cycle tracks and pathways

#### 235. How could we make it better in the future?

- At most I would only need to cross one road to get where I need to go. Almost inevitably always walk within the village.
- Connecting new housing to existing communities with paths.
- More cycle ways
- Better maintain paths between towns to encourage walking and cycling over using cars

## Streets and Spaces (Gullane)

#### 236. What is good now?

- There has been too much (ongoing) house building which has resulted in more noise, less privacy and a reduction in green spaces.

#### 237. How could we make it better in the future?

- It would be nice to see sports provision in the village expanded - a bigger skate park, a community gym facility.
- There is too much parking provided for cars and not enough street parking for bicycles, e.g. a parking space outside Gullane's Co-op using one of the car-parking spaces would really encourage people to cycle to the Co-op and prove that ELC is truly dedicated to the promotion of active travel.

## Natural Space

### 238. What is good now?

- countryside and beaches.
- Gullane is really well served in terms of access to nature with beautiful walking routes on every side of the village, which are walkable from anywhere within ten minutes

### 239. How could we make it better in the future?

- The noise and congestion in the village has increased and these have also negatively impacted on the enjoyment of these spaces.
- Cost reduced cost of parking.

## Play and Recreation (Gullane)

### 240. What is good now?

- There aren't enough playparks for children, especially on the east side of Gullane.
- We have some lovely open spaces - Goose Green, the Memorial Park and children's golf course as well as a fairly new Astro turf pitch and a good number of well maintained tennis courts

### 241. How could we make it better in the future? (Gullane)

- Build more please.
- It would be nice to see things like the skate park made bigger, and more land in the future set aside for recreation.
- The local community have developed some good spaces and facilities within the village.

## Social Interaction (Gullane)

### 242. What is good now?

- There are some longstanding places. However, it has become an expensive place to socialise.

### 243. How could we make it better in the future?

- Build socialising opportunities/places in to house building schemes.

## Aberlady

### Moving Around

**244. What is good now?**

- Pretty good on foot

**245. How could we make it better in the future?**

- Provide another pedestrian crossing at west end of village as cars speeding away from village & not slowing down coming in

### Natural Space (Aberlady)

**246. What is good now?**

- Lots of areas to walk around and enjoy countryside.

**247. How could we make it better in the future?**

- People come with their dogs and walk through planted fields, over growing crops and allow their dogs to run freely. Also they do not always pick up dog excrement and some of those that do will leave the bags behind. Gates are left open. We need notices with warnings of fines for dog fouling and being in control of pets plus explaining the country code.
- Some paths do get overgrown in the summer by weeds and local farmers etc could assist to clear these?

### Play and Recreation (Aberlady)

**248. What is good now?**

- Playing field by school, Goose Green, Kilspindy Castle paddock, Memorial Garden, seafront to Kilspindy Point. Play area in Pleasance very well used & being upgraded whereas Tranter Road development poor & not inclusive to village.

**249. How could we make it better in the future?**

- Tranter Road play area needs upgrade. Meadowside park incomplete
- Public toilets at Aberlady Bay car park disgusting & shameful.

## Dirleton

### Moving Around (Dirleton)

**250. What is good now?**

- Landscape views. Not building in field opposite
- Some good routes to key places
- Dirleton village is quiet, but need access to North Berwick and Gullane for essential services. There is a cycle path to the edge of Gullane and one (needing improvement) to North Berwick.

**251. How could we make it better in the future?**

- Some beach access is difficult for less mobile people



- The cycle path to North Berwick is sub standard. Almost immediately after being put in, tree roots started coming through it. The trees on the path and the roots make it potentially dangerous and difficult to share with other cyclists and pedestrians.
- There is no safe cycle or pedestrian route to Drem train station from Dirleton.

### Streets and Spaces (Dirleton)

#### 252. What is good now?

- Attractive space.
- Open spaces trees agricultural area

#### 253. How could we make it better in the future?

- Introduce activities or a coffee van or monthly pizza van on Dirleton green to connect locals and attract visitors to create more buzz.

### Natural Space (Dirleton)

#### 254. What is good now?

- The green and Archerfield but gate locked for access on mobility bike
- Castle, beach and play area all well maintained and accessible
- Everything - lots of natural spaces, beaches well cared for by the rangers. Village surroundings well kept.

#### 255. How could we make it better in the future?

- Access to Archerfield from village

### Play and Recreation (Dirleton)

#### 256. What is good now?

- Green and playpark
- Lots of informal opportunities to play for adults and children.

#### 257. How could we make it better in the future?

- More formal opportunities for adults would be useful.
- More rides in playpark
- More formal opportunities

### Social Interaction (Dirleton)

#### 258. What is good now?

- Church hall; Bowling club

#### 259. How could we make it better in the future?

- Access to bowling club for disabled

## Identity and Belonging (Dirleton)

### 260. What is good now?

- The village green
- Pretty place

## Care and Maintenance (Dirleton)

### 261. How could we make it better in the future?

- Lack of hedge maintenance restricts footpaths and visibility

## Place Standard - Preston Seton Gosford Area Partnership area

262. A response was received from a member of the Longniddry Community Council. This response considered that the pathways were good, though some pavements were narrow. That there are many green spaces in the village was mentioned as a good thing, as was proximity to the beach. Concern was raised about what was considered a large unused green space within the new Longniddry Village development as well as a poorly maintained area there with an easily accessible river. The response saw evidence of sewage in the small burns in the village. A new and additional playpark in new development was called for.



## Public Events

263. Comments were made regarding recreational routes.

264. New path links were called for: through Tranent from centre to Elphinstone Research Centre and beyond to Elphinstone, a link to countryside: around Spott; from Haddington to Pencaitland along the Tyne; from the cement works to Whitesands; Tynninghame to Binning Wood to be built; to the coast from Tynninghame; around Winterfield Golf Club; from Beaumont terrace to Spott Road; from QMU to Monktonhall Place; upgrade the Drift path (Wallyford/Pinkie); Carberry to Fa'side; Ormiston to Tranent shared use path; Blindwells to Prestonpans Station; paths generally at Blindwells; link to Longniddry/Haddington Railway path at Longniddry end;
265. Also in general from any new development to places of interest/schools/employment.
266. Cycle routes were also called for, including coastal routes; from Longniddry to Aberlady; through new housing site at Longniddry; in Musselburgh; Haddington to Gifford; Cement works to Whitesands and to A1087; Lagoons; cross-county; Tranent to Elphinstone.
267. A mountain bike track at Woodhall was suggested.
268. Comments were also made in support of green space, and calling for more green, open and play space in new development, as well as noting the need to safeguard open space. Allotment space was called for across East Lothian's communities. The Belhaven community garden was supported. A suggestion for outdoor gyms was made.

*Post-its:*

*"Food resilience across East Lothian; allotment waiting list; informal growing spaces; very useful!!"*

*"Alternative accessible green space and new country park?"* (Post it south of Blinkbonny wood by Lammer Law)

*"Replace boating pond"* (Musselburgh)

269. *"The SUDS pond at Windygoul is an excellent example, has created an amazing area for nature and people"*

### Primary School engagement

270. Some of the findings of consultation of Primary School Children in relation to Biodiversity and Natural Places are also relevant for Blue-green infrastructure. These include the care and concern children showed for nature and natural areas. Key findings of the consultation in relation to Blue-green infrastructure were:
- Ease and frequency of access to natural areas such as beaches and woods, green spaces and parks is highly important to children.
  - Independence to meet friends and go to places to play sports, play and hang out is highly important.
  - Planning decisions around green spaces, traffic and lighting are closely linked to children's independence and feelings of safety
  - Health is mentioned most frequently in relation to staying active. Parks for older children, sports facilities, safe roads and cycle paths are frequently mentioned in relation to this.
  - Health, being active and having access to green space are closely linked for children.
271. When asked "What's special about where you live?" the most frequent answers from children relate to natural areas, but also included 'park', 'walks' 'paths' and 'football' and 'astro'. A word cloud was created to show this:



272. East Lothian is fortunate to have beautiful beaches, woodland and hills, these are clearly appreciated by children. Some children are able to visit these places often as they live very close-by; others talk about the excitement of visits and exploring.
273. Natural space is an important component of outdoor play for children. From the children's responses across East Lothian, it's important to note that natural areas can be parks, small green spaces, trees and pathways. Small pockets of nature are as important to children as the bigger, more scenic places. Being able to go to natural areas easily and frequently seems to be the important factor. Children gave many reasons for enjoying natural areas including the importance for wildlife, fun and relaxation. Woods, parks and green spaces are places children have fun with friends, family and dogs.

*"There are trees and bushes near my house that I can climb in." Child at Cockenzie Primary School*

*"I like jumping in the sea and swimming in the sea." West Barns Primary School*



Figure 18 Climbing on the trees” by child at Cockenzie Primary School

274. Local sports pitches, parks, sports centres and swimming pools are mentioned as important places to be active, stay healthy and to hang out with friends. Children also talk about being active by playing out on bikes and scooters, walking and cycling to school. Having friends close by, spaces to meet and play is really important to children.

*“What’s special about my home is people play out quite a lot as we have a play park and a field. I’m allowed out by myself, you can see lots of other people to play with. They can look after you and you can look after them.”* Child at St Mary’s RC Primary School

275. In several areas, children are very animated when talking about areas such as paths, tracks and old railways lines. These are significant spaces to play. These places are often on the edge of towns and villages and tend to be free from cars, close to housing but not used frequently by adults. These are also mentioned as important places for wildlife.

276. Children like having sports facilities, parks, school, shops and community centres close by. Not having to drive to these facilities is important. Communities that children describe as safe have lots of paths to walk and cycle, places to play, see friends and family.

277. The Report on Primary School Engagement noted as ‘significant points’ about what children like about where they lived were:

- Frequent, easy access to natural spaces and places to play is important
- “Walkability” is important, characterised as car free routes, well-lit paths, areas with friends and family close by.
- Children enjoy being active, both by playing sports and active travel such as cycling, scooting and walking.



- The need for parks for older children is mentioned frequently.
- Playing out is mentioned frequently as important to children. The common factors supporting this are spaces without cars, natural spaces, safe routes, street lighting.

278. Traffic is a major point of concern for children and is frequently mentioned when discussing what is important for the next LDP. Children say there is a need for measures including safe walkways and cycle paths.

279. With regard to health, children linked this to being and staying active. They talked about the need for more swimming pools, sports facilities and pitches that are easy to access. Active travel was also often mentioned.

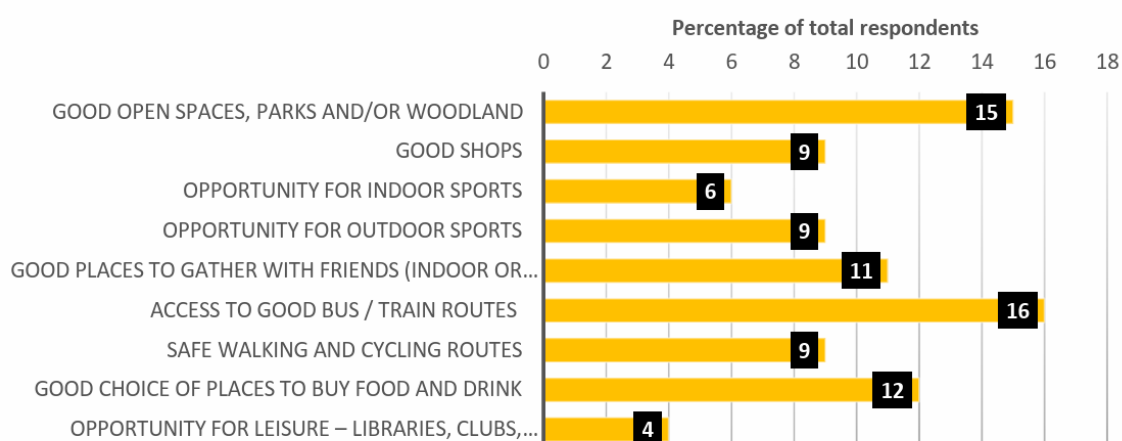
280. For the next LDP, the report identified issues related to blue green infrastructure as important to children including:

- Protection of natural areas, parks and green spaces
- Safe access to beaches, woods, parks and green spaces so children have frequent access to natural areas
- Parks for all ages, including older children
- Facilities for all ages and abilities – accessible crossing points, inclusive sports facilities, seating in parks and sports facilities, care homes
- Sports centres and pitches
- Skateparks and pump tracks
- Neighbourhoods to play out (green spaces, less traffic, adequate lighting)
- Cycle paths and safe walking routes

## Secondary School engagement

281. As noted above, in the Place Standard Engagement with young people, overall, ‘Nature – parks, woods, hills and beaches’ was rated highly by participants. Young people appreciated the access to nature they had in much of East Lothian (see Stakeholder Engagement – Nature Crisis &c).

**East Lothian - What do you like most about the area you live in? (pick all that apply)**



282. Parks, and/or woodland were the second most popular aspect that young people said that they preferred to hang out with friends, and that they liked about the area they lived in. Across East Lothian the majority of young people who responded liked the open spaces, parks and woodland in their area and thought there is access to good bus/train routes.

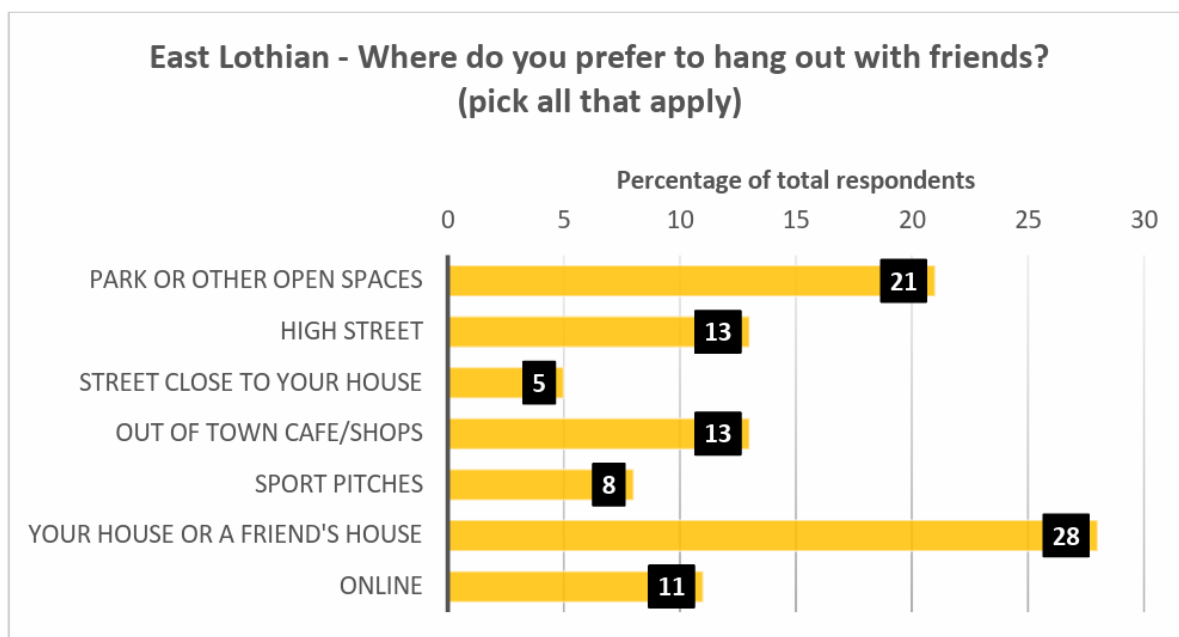


Figure 19 Responses to question in Secondary School questionnaire to 'Where do you prefer to hang out with friends'.

## WHAT THIS MEANS FOR THE PROPOSED PLAN

### Blue Green Infrastructure

283. The Central Scotland Green Network is a National Development. The LDP will require to consider what interventions are needed to achieve this in East Lothian. There may be opportunities to use site allocations to support its achievement.
284. The previous Local Development Plan required contributions towards the Segregated Active Travel Corridor now being developed as the 'East Lothian Active Freeway' but due to the significant requirement for contributions towards educational capacity and transport infrastructure, a framework for contributions towards other green infrastructure was not developed at that time. Development on allocated sites were expected to contribute to green infrastructure in accordance with the Development Brief for the site.
285. The engagement with both primary and secondary school children showed the importance of easy access to natural areas to them. Blue green infrastructure should be planned with the needs of children as well as adults and families in mind. Some elements of green infrastructure that are important to children may be very small and local. Planning for this will mean considering blue green infrastructure at a sufficiently local scale.

## AREAS WHERE THERE IS AGREEMENT OR DISPUTE –

### Blue Green Infrastructure

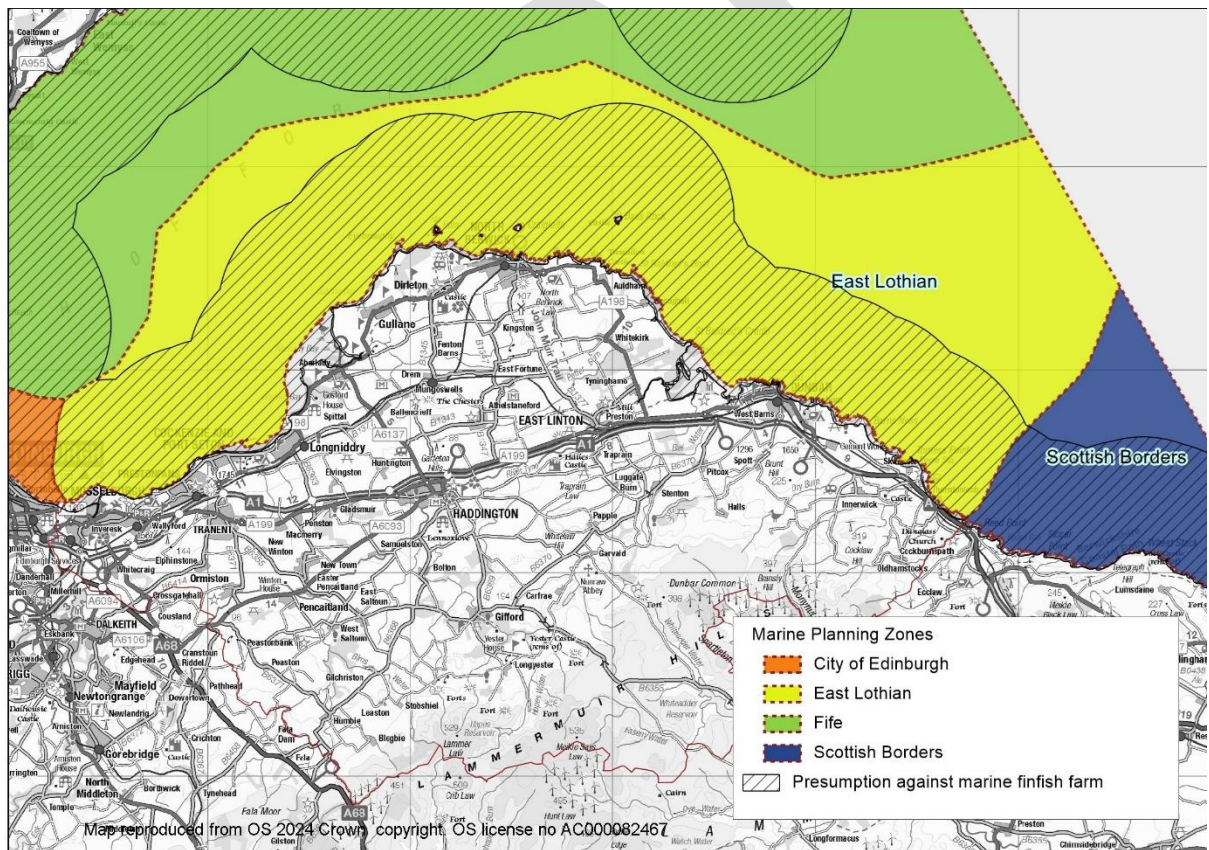
286. None

## Aquaculture

### NPF4 Requirements

LDPs should guide new aquaculture development in line with National and Regional Marine Planning, and will minimise adverse environmental impacts, including cumulative impacts, that arise from other existing and planned aquaculture developments in the area while also reflecting industry needs.

287. SEPA defines aquaculture as ‘the rearing of aquatic animals or the cultivation of aquatic plants in both seawater and freshwater for food’. East Lothian has a coastline, and therefore has responsibility for marine fish farming planning in the areas shown in the map below. Aquaculture covers more than just marine fish farming, and includes both inland fisheries and shellfish. Although aquaculture is more associated with rural and coastal communities in the north and west of Scotland, there is a small marine-related industry here, as well as some inland leisure fisheries.



288. Figure 20 Marine Planning Zones as defined in the refined in the Town and Country Planning (Marine Fish Farming) (Scotland) Order 2007. Copyright Scottish Government, contains Ordnance Survey data © Crown copyright and database right 2024. Contains information from Scottish Government (Marine Scotland) licensed under the Open Government Licence v3.0.

289. Aquaculture development can provide economic benefit, including from tourism, as well as providing healthy food. However, proposals can impact biodiversity, landscape, geodiversity and seascape if poorly sited and designed. There is the potential for overall direct and indirect negative impacts on species and habitats, including the displacement of native species from existing habitats, and risk of parasite and disease transfer to wild fish; introduction of non-native species and altered genetic integrity of wild stock. There can be impacts associated with operational activities including noise, light, waste, aquacultural litter and odour.
290. NPF4 Policy 32 aims to control these impacts. Policy 32 provides that no further salmon or trout open pen fish will be supported on the east coast. This includes all of the coastline around East Lothian (see Map xx below).

## EVIDENCE

### National Marine Plan

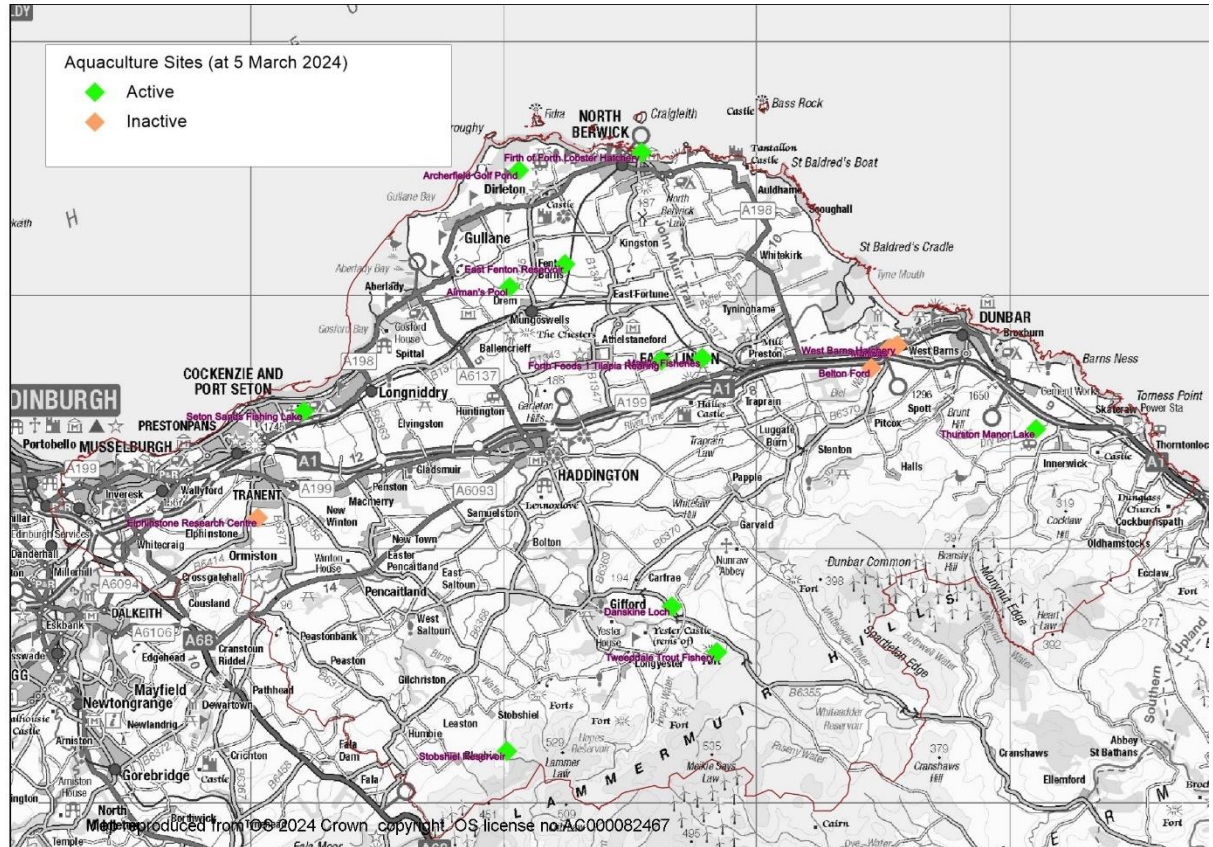
291. The National Marine Plan (NMP) covers Scottish inshore and offshore waters; so up to 200 nautical miles from the coast. Inland, it reaches to the Mean High Water Springs, so overlaps with terrestrial planning in the intertidal zone. The NMP sets out objectives for aquaculture. The first of these, which the others add to, is ‘an aquaculture industry that is sustainable, diverse, competitive, economically viable and which contributes to food security whilst minimising environmental impact’. Others include:
- to grow marine finfish production (including farmed Atlantic Salmon) and shellfish, especially mussels, with due regard to the marine environment;
  - quality employment and sustainable economic activity;
  - improve business confidence and reduce environmental impact by identifying areas where sustainable aquaculture growth is optimal; and
  - maximise benefits to Scotland and local communities from the Scottish aquaculture value chain.
292. The policies in the marine plan include that marine planners should seek to identify appropriate locations for future aquaculture development. System carrying capacity at the scale of the water body should be a key consideration (NMP Policy Aquaculture 1). Development plans should identify areas, along with marine plans, which are potentially suitable as well as sensitive areas which are unlikely to be appropriate for such development. However, there is a presumption against marine finfish farm development on the north and east coasts to safeguard migratory fish species (NMP Policy Aquaculture 2). See Map above. The NMP aquaculture policies also aim to protect seascape, landscape and visual amenity, following NatureScot advice on siting and design. There is also policy aimed at protecting fish from disease, and seals from harassment. Operators are expected to engage with communities and other who may be affected.

### East Lothian’s aquaculture

293. East Lothian does not have a very large aquaculture industry. No Controlled Activities Licences or Crown Estate Scotland lease agreements have been issued with respect to aquaculture here. There are no Shellfish Protected Areas. The nearest Disease Management areas for infections Salmon Anaemia is Area 21, in Berwickshire around the coast north of Eyemouth and south to Burnmouth, some 9 km east of East Lothian.



294. The following map shows all registered aquaculture sites in East Lothian.



295. Figure 21 Aquaculture sites as at 5 March 2024. Contains information from Scottish Government (Marine Scotland) licensed under the Open Government Licence v3.0.

296. The one active shellfish and marine aquaculture site is Firth of Forth Lobster Hatchery, at North Berwick, which rears lobsters and releases them into the wild. The lobster hatchery is run by Firth of Forth, a registered charity focussed on protecting the lobster population and fishing heritage of the Firth of Forth. The charity recognised that with declining fish stocks and increasing pressure on lobster population, work was needed to improve the marine ecosystem, and protect the fishing economy and lobster populations. Lobster fishing has been carried out in North Berwick for over 800 years, and the project aimed to sustain that.



Figure 22 Lobster pots

297. The project has been partly funded by the Nature Save Trust. Jane McGinn from the Firth of Forth lobster hatchery says of the project “The lobster hatchery is like a long-term investment, it’s an insurance policy for the fishing and cultural heritage of lobster fishing around the coast here. It’s not a massive industry, but it’s a very high value product, which makes it very

important to the local economies dotted around the Firth of Forth<sup>3</sup>.” Almost all of the North Berwick lobster catch is sold to the Lobster Shack on the pier.

298. The only active finfish site is at Markle Mains, registered for tilapia rearing.
299. The remainder of the active aquaculture sites are fishery sites, and are at Airman’s Pool, by Drem; Archerfield Golf Pond, Dirleton; Danskine Loch, by Gifford; East Fenton Reservoir, Fenton Barns; Markle Fisheries, by East Linton; Seton Sands Fishing Lake, Port Seton; Stobshiel Reservoir, by Humbie; Thurston Manor Lake, Thurston; and Tweedale Trout Fishery, by Gifford.
300. There are inactive aquaculture sites at Elphinstone Research Centre, West Barns Hatchery, the Maltings at West Barns and Belton Ford.

## Threats to Aquaculture

301. Howard Dryden of the [GOES Foundation](#), Roslin Innovation, Edinburgh, has carried out research which demonstrates that addressing pollution in the marine environment is more important and urgent than reducing carbon emissions, for the survival of species and the human race. A rise in the acidity levels of the ocean will cause small carbon based organisms to dissolve, with consequent effects up the food chain.

## STAKEHOLDER INVOLVEMENT

302. No comments were specifically made on aquaculture. However, comments were made on the value of the coastal area, beaches in particular, as natural space; the potential for fishing events; and the effect of marine litter including from fishing activity.
303. Beaches as natural and play areas were strongly valued by both primary and secondary school children. Comments were also made through the online survey made that natural areas including beaches should be retained. One comment was that planning for play should allow for open spaces, which should be protected, with the beaches local to Belhaven being mentioned in particular. Another mentioned Fisherrow Links as ‘a wonderful area for leisure’. There was also a call to protect and enhance marine habitats (saltmarsh and seagrass beds) as a response to the climate emergency.
304. A suggestion for more year-round activities was development of fishing events.
305. A comment through the online survey on the nature crisis noted that fishing lines and nets were a problem. A comment on marine litter was also made in the secondary school engagement: ‘make sure the turtles and fish are OK and are safe because so much rubbish is going into the ocean’.
306. There are four bodies with a statutory role in advising planning authorities on aquaculture planning. These are: NatureScot, SEPA, Marine Scotland Science and the Association of Salmon Fishery Boards. NatureScot and SEPA both gave comments on the engagement on the Evidence Report but did not specifically mention aquaculture [xx check]. Marine Scotland and the Association of Salmon Fishery Boards were informed about the consultation.
307. The Forth District Salmon Fishery Board, who protect and enhance the Forth Fishery, did not comment directly on the Evidence Report, but did comment on the Tree and Woodland Strategy consultation which was carried out at the same time. They noted that East Lothian harbours a small but significant population of salmon and migratory sea trout and that significant efforts are underway to improve their numbers under the Scottish Wild Salmon Strategy. They note the vital link between salmonids and trees. Riparian tree planting helps fish by regulating water temperature, providing food for both aquatic invertebrates and fish. They also provide cover for

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<sup>3</sup> See video at <https://www.firthofforthlobsterhatchery.org.uk/>



young fish and reduce run-off of pollutants into rivers. This increases overall biological productivity.

308. At a meeting held with key agencies, SEPA noted they hold hydro-morphological data on riparian issues.

## WHAT THIS MEANS FOR THE PROPOSED PLAN

### Aquaculture

309. The LDP could show areas around the coast that may be suitable for aquaculture, and sensitive to it, noting the presumption against marine open pen salmon and trout farming in NPF4 and the NMP means all areas of the coast are sensitive to this type of development.

310. The LDP should reflect the riparian planting objectives and mapping in the Tree and Woodland Strategy, to support salmon.

## AREAS OF DISPUTE –Aquaculture

311. None

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### REFERENCES

Austin, G.E., Calbrade, N.A., Birtles, G.A., Peck, K., Shaw, J.M. Wotton, S.R., Balmer, D.E. and Frost, T.M. 2023. Waterbirds in the UK 2021/22: The Wetland Bird Survey and Goose & Swan Monitoring Programme. BTO/RSPB/JNCC/NatureScot. Thetford. Data (except for supplementary counts highlighted in orange[\*]) released under the Open Government Licence v3.0. "Contains Wetland Bird Survey (WeBS) data from Waterbirds in the UK 2021/22 © copyright and database right 2023. WeBS is a partnership jointly funded by the BTO, RSPB and JNCC, with fieldwork conducted by volunteers and previous support from WWT."

[\*]including supplementary counts from the Goose and Swan Monitoring Partnership (GSMP)

Climate Change Committee (2022) *Progress in reducing Emissions in Scotland: 2022 Report to Parliament* Westminster, Climate Change Committee

Forestry Commission Scotland (2010) *The Right Tree in the Right Place: Planning for Forestry and Woodlands* Scottish Government

Moir, Marian "2022 County Report for East Lothian" Botanical Society of Britain and Ireland <https://www.bsbi.org.uk/annual-reports-2022/34920>

Woodward, I.D., Frost, T.M., Hammond, M.J., and Austin, G.E. (2019). Wetland Bird Survey Alerts 2016/2017: Changes in numbers of wintering waterbirds in the Constituent Countries of the United Kingdom, Special Protection Areas (SPAs), Sites of Special Scientific Interest (SSSIs) and Areas of Special Scientific interest (ASSIs). BTO Research Report 721. BTO, Thetford. [www.bto.org/webs-reporting-alerts](http://www.bto.org/webs-reporting-alerts)

### Photos

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