

# Working Towards a More Sustainable and Resilient North Berwick

## A contribution to the Local Place Plan based on the response by *Sustaining North Berwick* to East Lothian Council's first consultation on the Local Development Plan 2

### 1. Introduction

#### 1.1 Sustaining North Berwick

*Sustaining North Berwick* is a community based group interested in sustainability and biodiversity that:

- raises awareness about the challenges posed by climate change, resource depletion, loss of biodiversity and environmental degradation.
- encourages activities from all sectors of the local community to create a locally resilient and sustainable, zero-carbon, zero-waste future.
- collaborates with other organisations to develop sustainable thinking and action.

We run a Climate Café once a month where we welcome everyone to join us for a chat over a cuppa about local action we can take together.

To be added to our mailing list and be kept up to date with our activities, ***please contact us*** at [sustainingnb@gmail.com](mailto:sustainingnb@gmail.com)

#### 1.2 A contribution to the Local Place Plan

We offer this document as a contribution to the Local Place Plan [https://www.eastlothian.gov.uk/info/210547/planning\\_and\\_building\\_standards/12726/ldp2\\_and\\_local\\_place\\_plans/7](https://www.eastlothian.gov.uk/info/210547/planning_and_building_standards/12726/ldp2_and_local_place_plans/7) being developed by North Berwick Community Council <https://northberwickcommunitycouncil.org.uk/> and hope it will stimulate constructive debate with other community groups in the town leading to a common vision and plan for a sustainable and resilient North Berwick where we no longer rely on fossil fuels for energy, moving around and our food.

This document is based on our responses to questions (in italics) from East Lothian Council's consultation on the Key Challenges for the Local Development Plan 2 (LDP2).

#### 1.3 Urgency

The LDP2 is being developed at a time when the interconnected nature and climate crises are accelerating at an alarming pace and the need for dramatic action to address both is increasingly urgent.

Recent decisions by the UK Government to relax climate change targets demonstrate the need for communities to strengthen their ties and build resilience to face the challenges ahead.

However, local action and the LDP are no substitute for action at UK and Scottish Government levels to leave fossil fuels in the ground and speed up investment in renewables, public transport, sustainability at home and nature friendly farming. It is vital that the Scottish Government stick with their more ambitious targets.

#### **1.4 The Local Development Plan**

The Development Plan is, collectively, the documents that will be used to determine planning decisions over the next ten to fifteen years. These coming years are a critical period for addressing climate change.

The next Local Development Plan for East Lothian (LDP2) is in the early stages of preparation. For more information on the process go to:

[https://www.eastlothian.gov.uk/info/210547/planning\\_and\\_building\\_standards/12726/ldp2\\_and\\_local\\_place\\_plans](https://www.eastlothian.gov.uk/info/210547/planning_and_building_standards/12726/ldp2_and_local_place_plans)

*Sustaining North Berwick* welcomes the emphasis in the LDP on addressing health, nature and the climate. ***We hope that East Lothian Council will adopt bold policies within the LDP to match the scale of the threats we face.***

We also hope that the Council will ensure their departments work together holistically to implement the plan in line with their strong Climate Change and Tree & Woodland Strategies<sup>1</sup>.

## **2. Sustaining North Berwick's response to East Lothian Council LDP2 Key Challenges consultation**

### **2.1 How do you think the LDP can help to encourage healthier lifestyles?**

Active travel routes (for wheeling, cycling and walking) should be standard parts of bigger developments linking communities and stations. Reducing car use and moving more is better not only for health but for nature and the climate too.

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<sup>1</sup> Sustaining North Berwick responded to the Council's consultation on its draft Tree & Woodland Strategy.

We acknowledge the safe route to school at Grange Road and look forward to more being developed so that children become accustomed to cycling from an early age. Community groups identifying potential routes should be supported.

Community facilities such as libraries and community centres should be retained and enhanced because they can be sites for building resilience and strengthening ties through activities such as adult education and meals where people come together to cook for one another using locally grown, fresh ingredients. They also provide warm spaces for those facing fuel poverty.

Public greenspaces should be maintained and enhanced with planting, wilder spaces and opportunities to connect with nature - all good for physical and mental health. The use of glyphosate in public spaces should be reduced and wildflowers encouraged – with education so that people know that it is an intentional policy.

Land needs to be allocated for allotments, community gardens and community orchards within both existing settlements and new developments because of the health benefits of gardening, and to encourage consumption of fresh fruit and vegetables. This is especially important in new developments, which tend to have very poor biodiversity and very little community space.

Nature networks of every description and quality need to be protected, enhanced and extended.

Air quality is important. We welcome the notices on North Berwick High Street regarding the dangers of idling vehicle engines. We would like these to be enforced. Other places where this is an issue are Forth Street and, at school pick-up times, Law Road.

## **2.2    *How do you think the LDP can help to address the Climate Emergency?***

**The Council's Climate Change Strategy should be incorporated within the LDP2** so that it becomes part of the planning process and is given the highest priority when determining development applications, commensurate with the science.

Planning decisions need to be based on accurate data with due consideration being given to environmental and social considerations as well as economic ones.

**Design standards** should be set in the LDP based on best practice in energy efficient architecture. (See suggestions in section on energy efficiency below.) Developers should be required to fit:

- electric vehicle charge points to enable the transition away from petrol/diesel cars
- water butts
- facilities for home composting.

We need **better water management** for climate resilience so that we

- conserve clean drinking water and

- prevent flooding and & the overloading of sewers and release of sewage into rivers and sea, e.g. during heavy rainstorms.

New homes should be required to harvest rainwater and to recycle grey water waste to reduce the use of clean drinking water for domestic washing, toilet flushing and irrigation.

We need to **reduce traffic** in North Berwick and in East Lothian. To this end day trippers must be encouraged to use public transport and NOT to travel to East Lothian with a vehicle.

For this we need **more active travel routes** and **better public transport** including:

- additional train services within East Lothian to encourage commuters and visitors to choose public transport.
- extra bus services with more routes from North Berwick to other towns in East Lothian, as well as local community buses to bring people to the High Street, sports centre, train station etc. without need of a car. New estates such as Law Gardens should be served by these local buses which should be smaller. A circular service running every 30 minutes could be trialled.
- Public transport to beaches such as Gullane and Yellowcraig is needed so that people need not come by car.

As the **food system** is a major contributor to global heating the LDP could encourage public debate about:

- the food we eat
- where it comes from
- how it is produced within East Lothian

Existing natural habitats should be protected and enhanced, and new ones should be created - woodlands, meadows and marine habitats like saltmarsh and seagrass beds which are all important for **carbon sequestration**.

The Council should work with local community organisations to inform the public about the need to reduce carbon emissions and create new projects.

### **2.3 How do you think the LDP can help to address the Nature Crisis?**

The LDP provides an opportunity for public education on the threats to nature and the realities of biodiversity loss on land and at sea. The Council must set a gold standard for other developers by putting the protection of biodiversity first in all its own developments.

Modern agricultural methods are widely understood to have contributed to the Nature Crisis through:

- removing/neglecting hedgerows and other habitats
- the use of pesticides
- undermining soil quality.

The LDP could encourage moves towards regenerative agriculture and support initiatives such as the Nature Friendly Farming Network <https://www.nffn.org.uk/>

The Council should set **design standards** for new housing developments and set planning conditions to ensure nature is supported by:

- planting trees (especially fruit and nut)
- making boundaries with hedges instead of fences, using native species
- creating wildlife corridors
- providing high quality green spaces (not just grass!) such as allotments, community gardens or orchards
- factors maintaining shared green areas according to best practice in promoting biodiversity, with resident involvement where there is interest.
- planting species that are appropriate for the geographic area, drought tolerant and enhance local wildlife.

As part of achieving the targets of the Council's Tree & Woodland Strategy, landowners and managers should be encouraged to diversify into agro-forestry and to plant orchards<sup>2</sup> including heritage varieties, as well as fruit and nut trees along boundaries close to and within built-up areas.

Initiatives like No Mow May could be adopted by the Council for East Lothian's parks and gardens and for verge maintenance in the countryside. Frequency of cutting verges and hedgerows could be reduced generally to protect biodiversity, saving Council resources also.

The use of glyphosate should be reduced to a minimum, ie. in very special circumstances, such as to remove giant hogweed, but it should not be used for spraying areas at edges of mowed areas / along footpaths adjacent to SSSIs.

Wildflowers should be encouraged where appropriate by seeding, including along the periphery of golf courses.

The Council should ban the use of peat-based compost.

We are concerned at the number of gardens in North Berwick that have been paved over for parking. Whilst the need for parking is acute in some areas, e.g. the sea front, some of the parking areas are far larger than necessary and lack any plants. It seems that at least some of these are likely to be holiday lets. We suggest that the Planning process and Short Term Lets licensing scheme should require permeable parking spaces and planting.

## **2.4 Focus of LDP Spatial Strategy**

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<sup>2</sup> According to the BBC (2018) more than 40 varieties of Scottish apples have flourished over the centuries. The LDP provides an opportunity to raise awareness of the heritage apples that are still available and to encourage their planting in the interest of biodiversity.

*We have already identified some key issues that the next LDP spatial strategy will have to address. Which do you think are most important? Are there any missing?*

Of the options listed we highlighted the following:

- Addressing Climate Change
- Encouraging Sustainable Travel and Living
- Managing the Impact of Tourism
- Protection of High Quality Soils
- Woodland Planting and Restoration of Habitats
- Using Existing Infrastructure Capacity

We felt that the following should be added:

- Encouraging resilience
- Promoting food security
- Biodiversity and wildlife including the promotion of Nature Networks
- Water – supply and management including sewage. We are concerned about the future impact of climate change on rainfall and the capacity of our water supply, combined with rising demand for water due to population growth associated with housebuilding. We note the demand for water for crops and suggest that landowners make space (as some do) for small reservoirs. We are aware of problems with the capacity of the sewerage system in North Berwick.

## **2.5 Housing**

*The Council has to decide on a housing land requirement for the next 10 years.*

*Do you think we should allocate additional land- for housing through the next LDP? (over and above that already identified through the current LDP – 8,000)*

No. We have **serious doubts about the capacity of the local infrastructure** to support more houses than already allocated.

We are aware that the **sewerage system** is already inadequate to meet present needs. Although a new sewage treatment plant is planned, the existing piped network does not have sufficient capacity and regularly discharges raw sewage into private properties in the town. We are concerned that there may be **insufficient water** to meet the needs of a larger population in the plan period due to climate change. The **public transport** infrastructure – stations, frequency of service etc. – is inadequate for the current population let alone a significantly greater one. We doubt that the **National Grid** currently has sufficient delivery capacity either.

However, we do feel there is insufficient genuinely affordable housing available in North Berwick to ensure that people on low incomes are able to live in the town. This is due to the high cost of housing, a shortage of social housing and an imbalance of short-let properties compared with residential properties. In particular, one- and two-bedroomed homes are in short supply because of the number that have changed to commercial use as short-term

lets. The lack of such affordable housing leads to critical staff shortages, especially in essential roles such as social care and in retail and hospitality, affecting the local economy.

When considering possible sites for new housing, there should be a presumption against development in nature sensitive areas such as North Berwick Trust's Country Park.

*If you think there should be a new housing site identified in the next LDP what strategy aim should it address?*

More affordable housing should be the priority in North Berwick with a focus on key workers and young people working in the area. This needs to be achieved within the existing allocation and by addressing the volume of short-term lets. We are concerned that the term 'affordable' has become too broad. There needs to be a mix of shared ownership schemes and social housing (Council & Housing Association) with rents that are covered by Housing Benefit, building on good practices already underway at ELC.

In response to a question about providing small scale sites (20 houses or less), we suggested that there is potential for developing garage courts such as Craigleith Avenue, Dundas Road, Glenburn Road, Cromwell Road in North Berwick.

*How can the LDP encourage more land to be made available for self build housing?*

Infill sites are often chosen for this. We are concerned that the potential has been fully exploited in North Berwick already. Any new proposals should be assessed very carefully to ensure that an adequate curtilage remains to ensure space for biodiversity and wellbeing.

## **2.6 Tourism and Leisure**

We share the concerns of North Berwick Environment and Heritage Trust about the damaging effect on our community caused by the present high number of short-term lets. The economic benefits have been overstated and the negative impact on the availability of long-term rentals for local people has been underestimated.

We are aware of the difficulties faced by some long-term residents who are in a minority within properties divided into flats where most are second homes or short-term lets. The consequences for people in this position were graphically described in a letter titled 'Only ones left' in the East Lothian Courier on 7<sup>th</sup> September 2023.

The Council's policy on short-term lets needs to be sensitive to local circumstances. A control area should be implemented in North Berwick urgently to achieve a better balance between residential and business (i.e. holiday lets) use. Further analysis of the impact on community cohesion and the local economy of the loss of long-term homes is also required. At least in areas where there is a housing crisis caused in part by an imbalance between the number of second/holiday homes and main residences, as in North Berwick, a planning condition should be put on new builds (especially one- and two-bedroomed homes) requiring them to be used as the principal home.

The number of camper vans in popular destinations (e.g. North Berwick) should be limited and they should be encouraged to stay in campsites (and contribute to the local economy).

***What can we do to make day trip visits to East Lothian more sustainable?***

Seek additional train services, especially during holiday periods. Publicise the train service in Edinburgh and promote the Wallyford Park and Ride for travellers to North Berwick.

***What can we do to encourage more overnight stays in East Lothian?***

We do not support further promotion of overnight stays in North Berwick due to a shortage of hotel beds and the excessive number of short-term lets.

***What steps could we take to ensure tourism can take place without negative environmental impacts?***

We need a **Sustainable Tourism Strategy** for East Lothian.

Jet skis present a risk to sea creatures and disturbance to beach users. They should not be allowed to operate in the vicinity of North Berwick, the islands and the coastal Sites of Special Scientific Interest and RAMSAR bird protection areas in the East and West bays at North Berwick.

There should be no overnight parking by camper vans in residential areas, and land should be developed for extra coastal camp sites. ELC should **cease to promote drive destination tourism** in large diesel vehicles such as motorhomes. A suggestion mooted by Council officers for facilities for motorhome stays, including toilet waste disposal, near the A1 at Wallyford should be implemented. Visitors could leave their vehicles there and benefit from the excellent public transport links to both North Berwick and Edinburgh.

Ensure through the licensing scheme for short-term lets that proper provision is made for recycling and waste management.

***2.7 Infrastructure and Local Living***

***What actions could the LDP take to help reduce car trips and meet the national target?***

ELC should cease to encourage drive destination tourism generally.

Improve active travel options such as off-road cycle paths.

Encourage residents and visitors to shop locally and walk or cycle to their nearest high street. Encourage shops to offer home delivery. East Lothian could replicate schemes elsewhere involving the trialling of electric cargo bikes for home deliveries.

Ask owners/agents of holiday lets to encourage visitors to shop locally and buy East Lothian produce, thereby supporting the local economy as well as cutting emissions.

Require developers to prioritise active travel over car use as per the Dutch model where communities are linked by prominent cycle paths.

Increase Park and Ride opportunities and publicise them more widely.

Ensure that new housing developments are sited close to railway stations or bus routes. Where it is impractical to place housing within walking distance of a station, require



developers to provide a cycle path to the nearest station. Where a new development is not on a bus route, negotiate with providers to re-route services appropriately.

Review the adequacy of cycle storage at stations and encourage the rail authorities to invest in more facilities where needed. (The shelter at North Berwick station is usually full. Additional capacity might encourage more people to cycle to the station.)

Prioritise walking and cycling in town centres, e.g. introduce a 5mph speed limit on North Berwick High Street. Pavements such as at the east end of the High Street need to be widened. We know of at least one parent with a double buggy who does not shop on North Berwick High Street because it is unsafe. Measures like these could increase footfall by making it more attractive especially to wheelchair/buggy users and bring economic benefits.

Provide secure parking spaces for electric bikes.

### ***Issues To Be Addressed In Your Area Over The Next 10 Years***

*We are keen to know what you think are the key issues and opportunities in your area that the LDP should focus on over the next 10 - 15 years.*

*These issues could relate to:*

*Availability of local service;*

The provision of health services is very under-resourced given all the new housing in the last 10 years and there is now no minor injuries or facility for people to stay in the Edington for intermediate or palliative care. The result is that people and visitors have to travel to Haddington, or often make the even longer and harder journey to the hospitals in Edinburgh.

*Quality of the environment;*

Water quality and sewage.

*Sites in towns that could be enhanced;*

North Berwick High Street.

*Other land use issues that you think the LDP could help to address.*

It is essential that the land to the west of North Berwick High School remains designated as education land as in the existing LDP.

To address the increasing risk of food insecurity due to pressures on the global food system and supply chains, land is needed on the periphery of the larger settlements for small farms/market gardens. This could include Community Supported Agriculture initiatives.<sup>3</sup>

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<sup>3</sup> Access to land for new entrants to agriculture is typically problematic. Consideration could be given to replicating the Our Food 1200 initiative in Bannau Brycheiniog (<https://ourfood1200.wales/>) which aims to secure 1200 acres of land in 3 to 10 acre plots across Bannau Brycheiniog and Powys for modern, regenerative fruit and vegetable farming for local markets.

As more people change to electric vehicles, the need for charge points will grow. Facilities for charging electric bikes are needed too.

Current green spaces that are highly valued in North Berwick need to be maintained/protected including North Berwick Trust's Country Park, Elcho Green, the Lodge, the Coos' Green by the tennis courts, Castle Hill and the green area behind Tantallon Terrace, Daisy Island and the coastal path leading from the Haugh.

*Should the next LDP identify land for larger out of town non food retail, to reduce travel outside East Lothian?*

No.

### **2.8 What actions could be taken to improve energy efficiency in existing buildings?**

We welcome the Council's ideas for a District Heating Scheme to provide hot water for the larger settlements. This long-term vision is admirable but may not come soon enough for all those who wish to decarbonise their homes.

For those wishing to install solar panels, the planning system can sometimes be off-putting in conservation areas. Regulations that prioritise conservation over addressing climate change should be reviewed. Meanwhile the Council should make it as simple as possible to get planning permission and support applicants through the process.

Grants and advice available to encourage people to fully insulate and double/triple glaze existing houses.

Public buildings, shops and offices should be asked to turn lights off overnight.

### **2.9 How can the LDP best ensure increased energy performance in new buildings?**

Design standards should require new homes to be:

- orientated to benefit as far as possible from passive solar warmth and to achieve maximum benefit from solar panels, with no large windows in north facing walls!
- optimally sited and equipped with solar panels and batteries, insulation, under-floor heating and triple glazing.
- prepared for transition to zero carbon.

### **2.10 Also, are there any other key challenges that the LDP should look to address?**

**Food security** – the fragility of the global food system and the deleterious effects of climate change are increasingly being recognised. Over the period of the LDP we should become more self-sufficient in food. Seasonal eating and local production for local markets with less reliance on meat will become more important. East Lothian has good agricultural land and massive potential to provide for the food needs of local people.

There is a growing consensus amongst farming and environmental groups about the need for change in agricultural practices to address the nature, climate and public health crises, see <https://www.foodfarmingnature.org/>. See also <https://www.nourishscotland.org/> and <https://farmforscotlandsfuture.scot/>.