

Population and human health

Noise and Vibration

- 6.5. The Scoping Report identifies the relevant policy and guidance documents of which the Noise Impact Assessment should take cognisance. In addition to the receptors noted in the Scoping Report, sensitive receptors at Hawthornbank located on the B1348 Edinburgh Road should be considered for impacts.
- 6.6. Noise from demolition works currently being undertaken on the proposed site shall not be included in any assessment of the baseline noise climate. Peak noise levels, L_{Amax} should also be considered in any assessment of noise associated with demolition and operational phases. The assessment should predict internal day-time and night-time levels within residential properties of sensitive receptors associated with both construction and operational phases. Therefore night time surveys should be undertaken as noted in paragraph 247.
- 6.7. Section 10.4.2 'Embedded Mitigation' states that the acoustic bund constructed to protect occupiers from the noise of Cockenzie Power Station will be taken into account. This bund was constructed specifically to avoid noise from Cockenzie Power Station, which use has now ceased. There would not now therefore appear to be an obligation on the part of its owner to retain it. The continued existence of the bund should not be relied upon unless the bund is under control of the applicants and the application includes provision for it to remain in place.
- 6.8. The assessment of vibration as set out in the Scoping Report is satisfactory. There should be cross references to impacts of vibration on biodiversity and material assets.

Electro-magnetic fields

- 6.9. It is agreed that electro-magnetic fields can be scoped out of population and human health assessment, provided the maximum magnetic field strength of the proposal is not significantly greater than that stated in the Scoping Report namely 60uT.

Impact on outdoor recreation

- 6.10. The Scoping Report covers the main likely impacts on public outdoor access and core paths. However, public access is not confined to the designated core paths in this area, and public

recreation is popular in the open space areas adjacent to this site in particular the 'Green Hills' area immediately to the west of the site and impacts on this wider recreational access should be fully addressed. The proposed mitigation during construction for the Core Paths and the John Muir Way is acceptable.

- 6.11. Note that the terminology used in paragraph 311 of the Scoping Report is incorrect. 'Core paths' are designated under the Land Reform (Scotland) Act 2003 (East Lothian's core paths are listed in East Lothian's Core Paths Plan, which was adopted by East Lothian Council in 2010 and maps are available here: http://www.eastlothian.gov.uk/info/379/countryside_and_wildlife/1264/core_paths). "Rights of way" are designated under the Countryside (Scotland) Act 1967, and are a separate designation to "core path" designation. It is essential that both core paths and rights of way are taken into consideration during the Scoping study, as both are located in this area.
- 6.12. Regarding assessment methodology for access and recreation, (paragraph 321 of Scoping Report): In addition to the documents listed, consideration should also be given to:
- Designated Rights of Way ("Public Access Including Rights of Way" document, East Lothian Council, 1994)
 - National Cycle Routes (details on Sustrans website)
 - East Lothian Council Active Travel Improvement Plan (currently in preparation)

Tourism

- 6.13. The assessment as outlined in the Scoping Report is acceptable. It is not clear what the anticipated effect of the operation of the landfall and export cable would be on this receptor given that it is underground, and it may be possible to scope operation of the landfall and export cable from the assessment. The impact on visitors from access to the coast road should be included in the assessment as noted. The assessment should refer to key local and national tourism documents: East Lothian tourism http://www.eastlothian.gov.uk/info/200193/tourism_and_hospitality/1353/tourism_and_hospitality_businesses and National Strategy: available from this website: <http://scottishtourismalliance.co.uk/page/national-strategy/>

Biodiversity (flora and fauna)

- 6.14. Details of nationally and internationally designated sites can be found at SNH's website <http://gateway.snh.gov.uk/sitelink/> , and of legislative requirements at <http://www.snh.gov.uk/docs/A423286.pdf>
- 6.15. The Scoping Report identifies in paragraph 132 that it is anticipated that the most sensitive ecological/ornithological features of interest will be waterbirds associated with the adjacent Frith of Forth SPA, Ramasar Site and SSSI. SNH confirm that much of the survey data collected for the previous application will remain valid until August 2018. The summary of data validity provided in Section 6.3.5 of the Scoping Report is accepted. The Scoping report proposes to carry out revised habitat and species surveys (sections 6.3.6. and 6.3.7) and this approach is supported.
- 6.16. The Conservation (Natural Habitats, &c) Regulations 1994 as amended, or for reserved matters, the Conservation of Habitats and Species Regulations 2010 as amended apply. The site lies adjacent to the Firth of Forth and Outer Firth of Forth and St Andrews Bay Complex SPA. Both of these sites as well as others potentially impacted through impacts on species which are their qualifying interest should be considered through the EIA/Habitats Regulations Appraisal Process. Sufficient information should be provided within the ER to allow the Council to make assessment under the Habitat Regulations.
- 6.17. For information, the Habitat Regulations Appraisal of the proposed East Lothian Local Development Plan is available here: http://www.eastlothian.gov.uk/download/meetings/id/18025/15716_proposed_local_development_plan_habitats_regulations_appraisal_hra .This appraisal for the pLDP found, in assessing the EGT1 site within the pLDP that "As this site [EGT1 in the pLDP, of which the proposal site is part] is adjacent to the coast, there is potential for an effect on European sites" The site was screened out of having likely significant effect as such as the proposal consisted of 'elements of the plan for which effects cannot be determined as the nature and location of any effects is uncertain due to the general nature of the plan'. Mitigation was added to the plan in the form of a policy requirement for appraisal under the Habitats Regulations to be carried out.

- 6.18. The revised site has the potential to have greater impacts on marine mammals than the previous location and this should be considered. These may be affected through underwater noise and disturbance associated with the construction of the proposal and possibly also its operation. Noise can also affect availability of prey species. The main activities likely to result in noise or disturbance are piling, blasting, dredging and vessel movements but all potentially noisy activities should be assessed. There are also potential effects from sediment mobilisation affecting prey availability. Any blasting or piling works should be fully described and assessed.
- 6.19. East Lothian Council commissioned a bird survey to be undertaken to support the pLDP over the autumn and winter of 2016/7, looking in particular at the qualifying interest species of the Firth of Forth SPA. This survey includes records of visits to this area. The results of this survey can be obtained from the ELC Planning Service.

Land and soil (including erosion, compaction, sealing), Water (Geology and hydrogeology section of the Scoping Report)

- 6.20. As well as guidance referred to in the Scoping Report, the following Guidance Documents should be taken account of –
- Water Assessment and Drainage Guide, SUDS Working Party (2016)
 - Sewers for Scotland 3rd Edition, Scottish Water (2015)
 - Water for Scotland 3rd Edition, Scottish Water (2015)
 - General Binding Rules under the Controlled Activities (see The Water Environment (Controlled Activities) Scotland Regulations (as amended) A Practical Guide, Version 7.2, SEPA (March 2015).
 - SEPA Pollution Prevention Guidance (www.sepa.org.uk/regulations/water/guidance/)

Contaminated land

- 6.21. The level of assessment put forward in the Scoping report will suitably address any potential contaminative impact on identified receptors as well as potential ground stability issues.

Protection of the water environment

- 6.22. All maps mentioned in this section should be on an OS 1:10000 or greater (more detailed) base and should include details of all proposed upgraded, temporary and permanent site

infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements.

6.23. SEPA requires that the scheme must be designed to avoid impacts upon the water environment. Where activities such as engineering works in the water environment cannot be avoided the ER should include a map showing:

- All proposed temporary or permanent infrastructure overlain with all watercourses
- A buffer of at least 10m drawn around each watercourse. If this buffer cannot be achieved each breach should be numbered on a plan with an associated photograph of the location, dimensions of the watercourse and drawings of what is proposed
- Detailed layout of all proposed mitigation including all cut off drains and settlement ponds

Further advice and best practice guidance are available within the water [engineering](#) section of SEPA's website. Guidance on the design of water crossings can be found in our [Construction of River Crossings Good Practice Guide](#). This map should include details of all proposed upgraded, temporary and permanent site infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements.

6.24. If water abstractions of dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided.

6.25. Note that the proposed development may require an authorisation from SEPA under the Water Environment (Controlled Activities)(Scotland) Regulations 2011 (as amended) (CAR). Details of what SEPA would require to support such an application are included in their consultation response in Appendix 1 below.

Hydrology and Pollution prevention

6.26. Scottish Water general advice for development is among other things that any potential effect on the hydrology of the area resulting from the construction and operation of the proposed development should be assessed and the findings presented in the ER. This should include consideration of natural drainage patterns, base flows/volume, retention/run-off rates and potential changes to water quantity. Mitigation and proposed monitoring should also be detailed in the ER. Any potential pollution risk which could affect water quality should be considered and mitigation measures implemented to prevent deterioration in water quality

and pollution incidents. This includes sediment run-off soil or peat erosion, management of chemicals and oils &c. This should be considered for all operations at all stages of development including pre-and post- construction. Mitigation measures to prevent pollution to watercourses should be outlined in the ER.

- 6.27. The ER should set out the principles of all proposed pollution prevention and mitigation measures that are relevant to the proposed site.
- 6.28. A schedule of mitigation supported by the site specific maps and plans detailed below must be submitted. These must include reference to best practice pollution prevention and construction techniques, regulatory requirements, the daily responsibilities of Ecological Clerk of Works, how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer. Please refer to SEPAs [Pollution prevention guidelines](#).

Drinking Water

- 6.29. Scottish Water note that their records show no Scottish Water drinking water catchments or water abstraction sources which are designated as Drinking Water Protected Areas under the Water Framework Directive in the area that might be affected by the proposed development.

Foul Waste

- 6.30. SEPA require that the ER contains confirmation (or not) that Scottish Water has confirmed the acceptability of the discharge of foul waste from welfare facilities for construction and operation of the proposal into the foul water mains.

Scotlands Marine Plan

- 6.31. Reference should be made to Scotland's National Marine Plan, which sets out a range of planning policy in relation to marine renewable energy. The ER should make links to relevant planning policy to establish clear connections between the development proposals and relevant government planning policy aims.

Flooding and groundwater

- 6.32. Within the site SEPA Flood Maps have identified surface water and fluvial flood extents. SEPA believe that the fluvial flood extents shown on this map are possibly the result of demolition of the previous Cockenzie Power Station causing a depression. However, there is a drainage ditch identified on the OS maps which is south east of the proposed development. This may be culverted through the development potentially causing this fluvial flood extent. SEPA will require that a Flood Risk Assessment (FRA) assesses all sources of flooding including fluvial and investigation into a potential culvert running through the development. We would advise

that there should be no buildings erected over the culvert to ensure access if maintenance or repairs to the culvert are required. For information, an approximate 1 in 200 year water level for the area is 3.96m AOD based on extreme still water level calculations using the Coastal Flood Boundary Method. This does not take into account the potential effects of wave action, funnelling or local bathymetry at this location. SEPA also recommend that the applicant contact the Flood Prevention Authority with regard to the appropriate levels of freeboard for the area.

- 6.33. Refer to Appendix 2 of SEPAs [Standing Advice](#) for advice on flood risk. Watercourse crossings must be designed to accommodate the 0.5% Annual Exceedance Probability (AEP) flows, or information provided to justify smaller structures. If it is thought that the development could result in an increased risk of flooding to a nearby receptor then a Flood Risk Assessment must be submitted in support of the planning application. Our [Technical flood risk guidance for stakeholders](#) outlines the information SEPA require to be submitted as part of a Flood Risk Assessment.
- 6.34. Groundwater investigations should be updated due to the demolition of the previous power station. Groundwater level data must be acquired for post demolition of the power station.
- 6.35. Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. The submission must include:
- a) A map demonstrating that all existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.
 - b) If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected.

Please refer to [Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems](#) for further advice on the minimum information SEPA require to be submitted.

6.36. The East Lothian Council Shoreline Management Plan is available here:

http://www.eastlothian.gov.uk/downloads/download/2303/shoreline_management_plan

which contains information on coastal processes.

6.37. Investigation of into any formal and informal coastal defences will also be required and assessed as part of any Flood Risk Assessment. A Flood Risk Assessment for this site has previously been undertaken to support a previous redevelopment proposal for this site. There has been demolition since 2009 and as a result it is important to either update that Flood Risk Assessment or undertake a new one to determine the current and future risk of flooding at the application site and the potential impact of the proposed development on the risk of flooding elsewhere. The detailed Flood Risk Assessment should include the following:

- Investigation into the potential culverted watercourse through the site
- Investigation into all sources of flooding including coastal, fluvial, surface water and ground water
- Groundwater levels post demolition of the power station; and
- Investigation into any coastal flood defences that may remain on site

Legacy of coal workings

6.38. Paragraph 147 of the Scoping Report notes that constraints might include the history of contamination of the site from past use for coal mining. The Scoping Report notes that a desktop study of the baseline environment, inclusive of mining, will be conducted and submitted as part of the EIA report. The embedded mitigation includes targeted site investigation information which will allow for a detailed design of the proposals to avoid destabilisation of mine workings.

6.39. The eastern part of this site is within a Coal Authority Referral Area. This means area that has been defined by the Coal Authority as containing potential hazards from former coal mining activity. These hazards can include: mine entries (shafts and adits); shallow coal workings; geological features (fissures and break lines) mine gas and previous surface mining sites. Although such hazards are seldom readily visible, they can often be present and problems can occur in the future, particularly as a result of development taking place.

6.40. Information outlining how the former mining activities affect the proposed development should be included. A Coal Mining Risk Assessment (CMRA) will be required as part of the ES. The developer is advised to go to the Coal Authority website at <http://coal.decc.gov.uk/en/coal/cms/services/planning/strategy/#> and look for the “CMRA

Model Template and Guidance”. The CMRA should be prepared by a competent person and include site specific information as well as information on how this affects the development and layout.

- 6.41. Part of this development proposal lies within an area covered by The Coal Authorities Standing Advice. This area lies within a former coal mining area which may contain unrecorded coal mining related hazards. If any coal mining feature is encountered during development, this should be reported immediately to the Coal Authority on 0845 762 6848. Property specific information on past, current and future coal mining activity can be obtained from the Coal Authorities Property Search Service on 0845 762 6868 or at www.groundstability.com.
- 6.42. Your attention is drawn to the Coal Authority policy in relation to new development and mine entries available at www.coal.decc.gov.uk. Please note that any intrusive activities which disturb or enter any coal seams, coal mine workings, or coal mine entries (shafts and adits) requires the prior written permission of The Coal Authority. Such activities could include site investigation boreholes, digging of foundations, piling activities, other ground works and any subsequent treatment of coal mine workings and coal mine entries for ground stability purposes.

Air Quality

- 6.43. The proposed methodology for assessment of impacts on local air quality are satisfactory. It is not anticipated that there will be any significant impacts on air quality during either the construction or operational phases of the development that could result in breaches of any air quality objectives. It is possible that there could be impacts from dust and on health from particulates. There is a significant potential for nuisance dust to impact on the amenity of nearby sensitive receptors.
- 6.44. As such, it is imperative that a Dust Management Plan be incorporated into any Environmental Management Plan (CEMP) and that any Dust Management Plan specifies the mitigation measures to be taken especially in periods of dry and/or windy weather. It is noted that Dust Management Plan is included in the embedded mitigation.
- 6.45. As with the noise assessment, the consideration of dust should consider the potential for effects with and without the bund adjacent to housing at Atholl View.
- 6.46. The main impact on air quality arises from dust through its consequential impact on human health and amenity, however this is listed in ‘Air’ the Scoping table above.

Material assets

Scottish Water assets

- 6.47. Scottish Water note there is a 10" steel water main and a 350mm rising combined sewer within the site. There is also a 120mm emergency overflow which appears to be just outside the site boundary. The location of Scottish Water assets (including water supply and sewer pipes, water and waste treatment work &c) should be confirmed by obtaining detailed plans from their Asset Plan providers. All Scottish Water assets potentially affected by the development should be identified, with particular consideration being given to access roads and pipe crossings, and impacts on them considered in the ER. This assessment should include the impact of vibration on the asset, and of tree planting in association with the proposal, as their assets can be at risk from root growth. Vibration close to Scottish Water pipelines or ancillary apparatus should be managed in accordance with British Standard 5228-1:2009. The impact of increased loading on Scottish Water assets and any measures to reduce this should be included in the ES.
- 6.48. Risk to Scottish Water assets from accidents and consequential damage to their assets and others should be considered.
- 6.49. Scottish Water state that all their processes, standards and policies in relation to dealing with asset conflicts must be complied with. See Scottish Water response in Appendix 1 for details of asset plan providers and their expectations for dealing with asset conflicts. Their response also contains a list of precautions to be taken into account when working near Scottish Water assets. If the means of dealing with asset conflicts themselves result in environmental impacts this should be included within the ER.

Road Network

- 6.50. Impacts on the road network should be included as described in the Scoping Report. Impacts on pedestrian delay, accidents, safety and hazardous loads also have links to human health and cross reference should be included.
- 6.51. For cumulative assessment, the Scoping Report states that development at Blindwells will be considered. Other sites especially those within the proposed East Lothian Local Development Plan should also be considered for their potential for cumulative impact. East Lothian Council has commissioned traffic modelling in relation to the pLDP. This information may help with understanding the impacts of construction traffic from the proposal. For further information contact East Lothian Council Transportation.

Cultural Heritage

National Importance

- 6.52. Historic Environment Scotland are content that impacts on their historic environment interests are not likely to be significant. Their interests are World Heritage Sites, Scheduled Monuments and their settings, category A listed buildings and their settings, Inventory Gardens and Designed Landscapes, Inventory battlefields and Historic Marine Protected Areas. Although a small part of the development boundary lies within the Battle of Prestonpans inventory site, due to the scale of the area and its location on the battlefield, any impacts on the overall designated area are not likely to be significant on the national interest in this site.

Local importance

- 6.53. Paragraph 235 sets out the method for identifying cultural heritage assets that could be affected in line with “Managing Change in the Historic Environment” (HES 2016) and this is supported. The approach is to identify the cultural heritage assets that might be affected, and define the setting of each asset (where they are considered to have one). Due to the brownfield nature of the site, it is considered that direct effects are unlikely, though this should be checked against the Historic Environment Record held by East Lothian Councils archaeology service.
- 6.54. For setting effects, a ZTV should be supplied overlain with the locations of cultural heritage assets including listed buildings, scheduled monuments, Conservation Areas. From this, those which may be affected due to views of or to them can be identified. Views ‘through’ a receptor should also be considered, which may be more challenging as it may involve consideration of receptors which do not have visibility of the development (and so are not included on the ZTV overlay) but are seen in context with it from other key viewpoints.
- 6.55. Receptors that should be considered include Cockenzie Conservation Area, and listed buildings within it, including Cockenzie Harbour.
- 6.56. There is the potential for cumulative impact with other development on cultural heritage receptors for which the view from them is important including those on higher ground. This should be considered through assessment of the individual receptors and should not be scoped out without identification of those receptors and their cultural heritage qualities.

Landscape

- 6.57. SNH comment that the site is visually prominent and is in a key location between the Prestonpans and Cockenzie communities. There is the potential for the development to have impacts on the local amenity of existing open spaces and also accessible points on the coastal fringes and from the Edinburgh Road. In order to reduce the impacts, the siting and design approach for the proposed infrastructure, including its various buildings should be strongly design led and informed by careful landscape and visual assessment and consideration of placemaking. The design relationship of building proposals to existing and surrounding built form and the sequential experience along the Edinburgh Road should be carefully considered. The EIA should address the scale, massing and principles of external treatment of the buildings, and these matters should be clearly communicated in sufficient detail in submitted drawings and supporting visualisations. A design statement document outlining these matters should support any application.
- 6.58. SNH advise that the slow growth rate of existing trees and woodlands on and around the site means a realistic view will have to be taken of the role of woodland planting for landscape mitigation. Detailed specifications for its establishment and long terms management should be put forward in the ER if it is to be relied upon for mitigation.
- 6.59. LVIA should address integration of the proposal into the landscape and screening of the built form, especially from the west, including views from closer public spaces and from along the coastal edge of Prestonpans. There are also sensitive views from the John Muir Way. Although there is potential for using the mounding on Preston Links and to the east to integrate or screen the built form, this cannot be relied upon where it is not in the control of the applicant.
- 6.60. If any off-site mitigation is to be included through enhancement or modification of surrounding landforms or planting of nearby open spaces, this should be shown in the ER. The ER should show how the proposal addresses the importance of maintaining the amenity of the informal open space at Preston Links.
- 6.61. The sites is located in landscape type “Musselburgh/Prestonpans Coast” character area as defined by the Ash 1998 study (SNH commissioned ‘Landscape Character Areas – the Lothians 1998). There are a handful of mature trees and shrubs growing within and on the southern roadside boundary of the site. The landscape setting is open an exposed coastal area with views across the Firth of Forth to Arthurs Seat in Edinburgh and the Forth bridges. There are good views across the site to Cockenzie Harbour. The John Muir Way is adjacent to the northern boundary of the site. This site has a coastal setting, with views from the adjacent

Special Landscape Area, Cockenzie Conservation Area and core paths, which could potentially be impacted by development.

- 6.62. East Lothian proposed Local Development Plan 2016 included proposed designation of Special Landscape Areas to replace Areas of Great Landscape Value. Further information on this proposed designation can be found in Technical Note 9 and appendices, available by following the links from here:

http://www.eastlothian.gov.uk/meetings/meeting/5986/members_library_service

The proposed Special Landscape Areas should be included in the Landscape and Visual Impact Assessment (LVIA) of the proposal. The pLDP also includes designation of areas of Countryside Around Town. Further information is available in Technical Note 8, which can also be found following the link above.

- 6.63. LVIA should include assessment of impacts on Special Landscape Areas and proposed Countryside Around Towns areas within 5km of the site. The assessment should include a full topographical analysis survey of the site showing contours, spot heights at no less than 0.5m intervals, boundary features such as the coast to low tide mark, the jetty and the mounds to the west and east of the site. The topographical survey should include adjacent areas, the extent of which should be discussed with the Council. Existing and proposed contours should be labelled, and the landscape character areas and Special Landscape Areas clearly identified with a colour coded key. A north/south and east/west cross section of the site is required, clearly showing the existing ground and proposed ground levels and how the proposed development will related to the adjacent landscape setting.
- 6.64. It is noted and agreed that the LVIA will be carried out according to the Landscape Institute/IEEMA guidance "Guidelines for LVIA" 3rd addition.
- 6.65. A full level survey and proposed finished level plan must be included to enable an accurate ZTV of the proposed development. A ZTV should be provided on a 1:25000 base map, using the up to date version of the OS Terrain-5 Digital Terrain Model data, with local features such as tree belts, woodland and built form modelled in sufficiently to produce a screening ZTV map. This should be provided to 5km from the site centre, and be presented on an AO sheet at 1:25000 scale, with photomontages on a minimum A3 fold out format. ZTVI information should provided for the existing site and for the highest roof ridge of the proposed buildings contained within the development. The legend should include the finished floor level and proposed roof ridge height upon which the ZTVI has been based. The provision of further photomontages should be agreed with the Council once the ZTVI information has been

produced. The ZTVI information should be submitted in shapefile format (.shp file extension) as well as in hard copy.

Viewpoints

- 6.66. All viewpoints must be shown in a schedule including the viewpoint number, 6 figure grid reference and location address. This information should be shown on the ZTVI plan. Each photomontage should include a view direction arrow shown on a clearly legible site location map in the corner of the sheet.
- 6.67. Photomontages should accurately illustrate the proposed development, and locations should be chosen to avoid the development being obscured by existing or proposed landscape. Viewcone at 50cm viewing distance, 45 degree viewcone for some of the photomontages where the proposed development is difficult to see due to distance may be required. Birds eye views and longitudinal cross sections are a preferred format for showing the details of any proposed landscaping. Details of how photomontages have been prepared should be provided in the methodology statement. This information should include details of computer software used, photographic details, terrain data used and modelling methodology. Any limitations of the overall methodology should be clearly stated. Only Ordnance Survey DTM 5 metre contour data should be used to create the 3D computer generated terrain model. 10m contour data should only be used in locations where the 5m data is not available. Viewpoints should be chosen that do not have obstructions such as hedgerows, gates, walls or mounds blocking the view of the proposal.
- 6.68. Where the ZTV shows that there is likely to be visibility from an area one or more representative viewpoints from within Special Landscape Area, Conservation Area, Core Path, Monument, designed landscape, public park and roads should be chosen.
- 6.69. Given the changed location of the proposal a re-appraisal of the previously submitted viewpoints is needed. These should be based on identified likely significant impacts, which should be ascertained from study of refined draft layout proposals which have been modelled through more detailed ZTV's and specific wirelines of the proposed built form. Further attention should be paid towards potential impacts from the more open locations including existing open spaces around the site and paths, and publicly accessible locations on the edge of Prestonpans. Page 62 of the Scoping Report in Table 8 lists nine viewpoints. Based on consideration of the ZTV information and indicative layout supplied by the applicant (Appendix 2) Viewpoint 1, 2 and 8 are not required. In addition to the remaining 6 viewpoints, the following should be included:

- a) VP1 inside the security fence adjacent to the jetty and John Muir Way looking south across the application site, grid ref 339453E, 675624N
- b) Top of grass mound to the west of the site looking due south east, grid ref 339185E, 675243N
- c) Inside the security fence, ramp at SW corner of the site looking due east across the site grid ref 339390E, 675176N
- d) Cockenzie Harbour, looking due south west across the site, grid ref 339840E, 675761N
- e) Footpath to the north of Edinburgh Road B1348 adjacent to the site, looking due NW across the site, grid ref 339743E, 675509N
- f) John Muir Way footpath and Cockenzie Conservation Area, looking due west, grid ref 339823E, 675543N

6.70. Should the layout or ZTV information change, additional or different viewpoints may be required.

7. Mitigation and Monitoring

7.1. A description of any measures envisaged preventing, reducing and where possible offset any significant adverse effects on the environment should be given, in particular as noted above. A monitoring plan for mitigation measures should also be included.

8. Information gaps

8.1. An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant or appellant in compiling the required information should be given, including any data that has not been available.