

MARKET APPRAISAL REPORT



**BELHAVEN HOSPITAL
BEVERIDGE ROW
DUNBAR
EAST LOTHIAN
EH42 1TR**

DECEMBER 2025

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1.0 LAND VALUE APPRAISAL

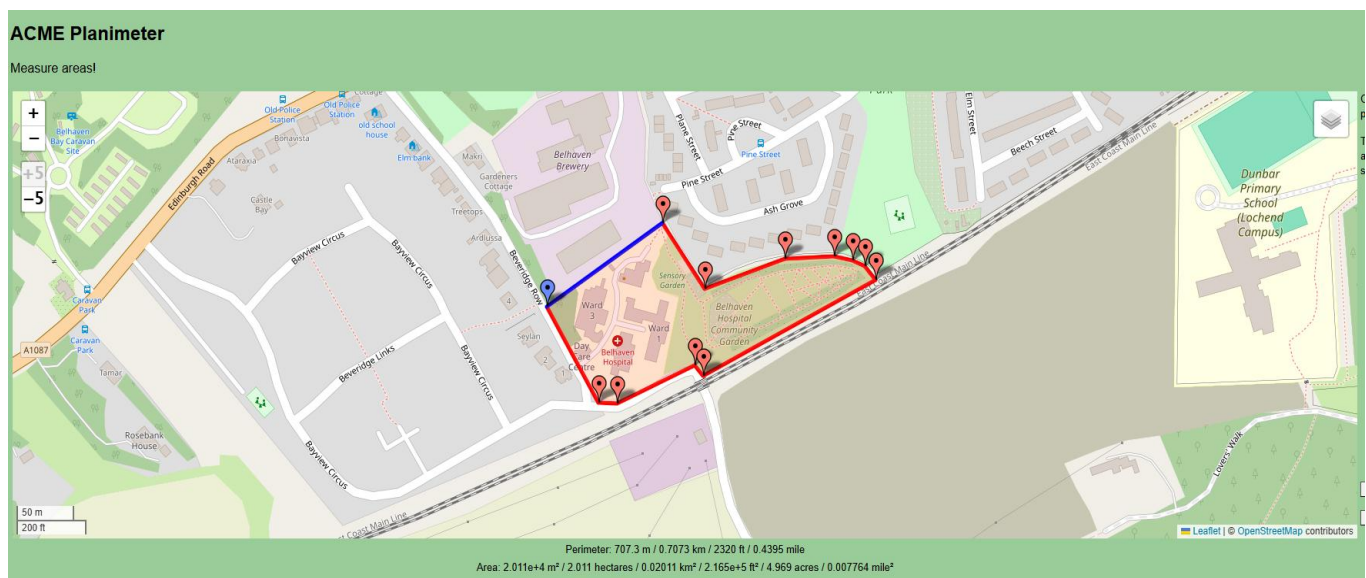
2.0 PLANNING APPRAISAL

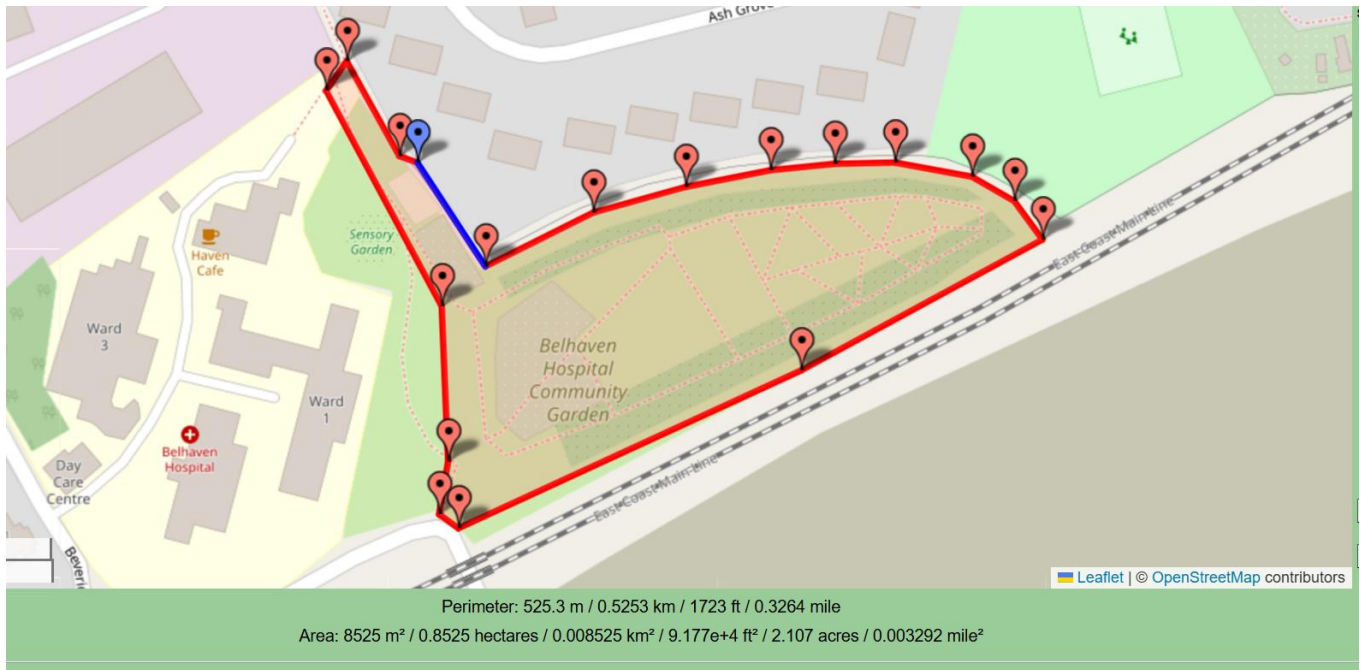
1.0. INTRODUCTION

Ryden has been appointed by NHS Lothian to assist with the disposal process of Belhaven Hospital. As part of our instruction we have been requested to provide an indication of the value of the asset assuming it was placed on the open market. The following report explains how we have arrived at a value and details the assumptions we have made.

2.0 CONTEXT

The site comprises hospital buildings to the west and the Belhaven Community Garden to the east. We have calculated that the overall site area is 2.011 hectares (4.969 acres) of which the Community Garden occupies 0.8525 hectares (2.107 acres). Other than the approved Change of Use Planning Application made by Sustaining Dunbar in 2013 the only other relevant Planning History dates back to 2001 when a consented Planning Application was made by Lothian Primary Care NHS Trust granting Outline Planning Permission for Housing Development on the area of ground now used as a Community Garden. This Planning Consent has of course expired however for the purposes of this Report we have assumed that the site could be repurposed for residential development. Recent development of land in close proximity to the west and south of the Hospital by volume housebuilders has established the location as being a sought after residential opportunity. Please see under Appendix 2.0 a summary Planning Approval dated August 2025.





- Community Garden Area - 2.107 acres
- Remainder of Land excluding Community Garden Area - 2.862 acres

3.0. LAND VALUE APPRAISALS

We have undertaken two Residual Land Value Appraisals included within Appendix 1.0. In undertaking these Appraisals, we have made a number of assumptions detailed in Section 4.0 below. Our Appraisals suggests:

- Value of entire site for residential development - £2,361,317.
- Value of the existing site excluding the community garden - £1,209,761

In arriving at our appraisals we have considered recent house prices for new build family housing within Dunbar and our opinion is that this site would be appealing to a number of medium sized and volume housebuilders particularly bearing in mind the underlying strength of the East Lothian market.

4.0. APPRAISAL ASSUMPTIONS

Development Assumptions:

- Demolition Costs - £250,000
- Section 75/Planning Gain Costs - £10,000 per unit
- Services Upgrades - £100,000
- Groundworks - £300,000 for the whole site and £175,000 for part only of the site (excluding community garden)
- Private for Sale Values - £320 per sqft

- Affordable Housing Value - £15,000 per unit
- Construction Costs - £165 per sqft (includes prelims and design fees)
- Developer's Profit - 20% of Gross Development Value
- Contingency - 4% of Construction Costs
- Planning & Building Regulations Fees - £150,000 for the whole site and £100,000 for part only of the site
- Finance Costs - 6.50% interest on 70% of the Gross Development Costs
- Planning Consent Granted for Residential Use
- Single Phase of development

Development Mix for Whole Site (4.969 acres Gross)

- 29 Private for Sale Units comprising 50,932 sqft
- 9 Affordable Housing Units

Development Mix for Part Only of Site (2.862 acres Gross excluding community Garden)

- 17 Private for Sale Units comprising 29,337 sqft
- 5 Affordable Units

5.0. SUMMARY

The land is situated within an established and sought after residential location. While there is no existing planning consent for residential redevelopment we believe that if the site was openly marketed there would be strong interest from housebuilders to acquire the land subject to planning consent being granted. It should be noted that there would be a bigger pool of buyers for the entire site as opposed to the western section only in the event that the community garden area is not included in any future sale.

Our appraisals suggest that if nil value was attributed to the community garden the anticipated land receipt available to the NHS is reduced by £1,151,556.

APPENDIX 1

LAND VALUE APPRAISAL

Belhaven Hospital

Belhaven Hospital - Whole Site
Dunbar

Tenure & Timetable

Tenure is Freehold

	Construction Starts	Construction Mths	Letting Void	Letting Date	Rent Free	Sales Mths	Sale Date
Single Phase - 29 private for sale & 9 affordable	12/2025	12					11/2026
Project Start	12/2025	Fees Start	12/2025	Duration	12 Mths	Project End	11/2026

Development Summary

Unit Sales					16,433,240	
Gross Development Value						16,433,240
Construction					8,739,931	
Demolition					250,000	
All other costs					1,258,665	
Finance					371,081	
Development Cost						10,619,677
Profit Required	20.00 %	of GDV	25.00 %	of GDC		3,286,648
Balance available					2,526,915	
Purchase costs						165,598
					Residual Land Value	2,361,317

Statistics

Land Value	2,361,317	Site Area (Acres)	4.97
Total Construction Costs	8,739,931	Total Area: Net (sq.ft.)	50,932
Interest	371,081	Total Area: Gross (sq.ft.)	50,932
Peak Borrowing	2,104,383		
Peak Debt	8,762,023	Land Value / Acre	475,210
Gross Development Costs	13,146,592	Land Value psf (net)	46.36
Gross Development Value	16,433,240	GDC excl. land psf (gross)	208.51
Development Yield on Cost		GDC incl. land psf (gross)	258.12
		GDV psf (net)	322.65
Break-even value	80.00 %	of GDV	
		Profit	3,286,648
		Net Equity	3,755,153
		Profit / Net Equity	87.52 %
		Profit as % of GDC	25.00 %
		Profit as % of GDV	20.00 %
		Profit as % of Total Construction Cost	36.56 %
		Profit / sq.ft. (gross)	64.53
		Profit / sq.ft. (net)	64.53
		IRR	40.24 %
		IRR on Net Equity	148.82 %
		NPV at 10.000 %	2,767,727

Belhaven Hospital

Capitalisation & Sales

Single Phase - 29 private for sale & 9 affordable

Net Area	50,932 s.f.	
Value at	320.00 p.s.f.	
Market Value	11/2026	16,433,240

Gross Development Value **16,433,240**

Costs

Demolition 12/2025 250,000 v

Construction

Base cost	(see schedule)	8,403,780 v
Contingency	4.000 %	336,151
		8,739,931

Special Costs

Planning/Building Regs	12/2025	150,000 v
Services upgrades	12/2025	100,000
Groundworks	12/2025	300,000
S75 @ £10k per unit	06/2026 (10,000 x 38 sq. ft.)	380,000 v
		930,000

Post Construction

Cost of Sale	(see schedule)	328,665 v
		328,665

Finance

Compounded quarterly		
Loan interest (see schedule)	6.50 %	371,081
		371,081

Development Cost **10,619,677**

Residual Land Value **2,361,317**

Purchase costs		
Standard Purchasers Costs	1.500 %	35,419 v
LBTT(Scotland)	5.513 % (4.594 % of Price+VAT)	130,179
(see schedule)		165,598
Gross Development Cost		13,146,592
Profit Required	20.00 % of GDV	3,286,648
Gross Development Value	25.00 % of GDC	16,433,240

Belhaven Hospital

Schedules

Single Phase - 29 private for sale & 9 affordable

Construction Starts / Ends	12/2025	11/2026
Projected Sale	11/2026	16,433,240

	Area Net/Num	Area Gross	Sale Rate	Sale Value	Construction Rate	Construction Cost
Private for sale (29 Units)	50,932	50,932	320.00	16,298,240	165.00	8,403,780
Affordable Hosuing (9 units)	9.00		15,000.00	135,000		
		50,932	320.00	16,433,240	165.00	8,403,780
Contingency	4.00 %					336,151
Total Construction						8,739,931

VAT Schedule

	Amount	VAT %	Total VAT	Net VAT
Purchase Price	2,361,317	20.00 %	472,263	0
Construction	8,989,931	20.00 %	1,797,986	0
Acquisition & Finance	165,598	20.00 %	7,084	0
Special Costs	930,000	20.00 %	106,000	0
Post Construction	328,665	20.00 %	65,733	0
	12,775,511		2,449,066	0
Percentage of VAT recovered	100.00 %	Average recovery time	3 months	

Sale Fees Schedule

	Date	Rate	Amount
Single Phase - 29 private for sale & 9 affordable	11/2026	2.000 %	328,665 v
Total			328,665

Finance Schedule

	Amount or %	Rate	Starts	Months	Accrued / Paid	Profit Share	Interest
Interest	70.000 %	6.500 %	12/2025	12	Paid		371,081

Stamp Duty Schedule

Stamp Duty based on Purchase Price plus VAT - LBTT(Scotland)

Stamp Duty Bands :	From	To	Tax Rate	Taxable Amount	Duty
>	0	150,000	0.00 %	150,000	
>	150,000	250,000	1.00 %	100,000	1,000
>	250,000	and higher	5.00 %	2,583,580	129,179
			4.59 %	2,833,580	130,179

Assumptions

1. Interest is compounded quarterly
2. Construction related payments are made monthly.
3. Purchase and any rent are paid in advance, at the beginning of a month.
4. All other costs are paid in arrear, at the month's end.
5. Sales take place at the end of the month.
6. YPs are calculated on the basis of rents received annually in arrears (Parry's).
7. VAT is applicable to items marked "v"
8. Rent is paid quarterly in advance.

Belhaven Hospital

Belhaven Hospital - Part Only Of Site (excl Community Garden)
Dunbar

Tenure & Timetable

Tenure is Freehold

	Construction Starts	Construction Mths	Letting Void	Letting Date	Rent Free	Sales Mths	Sale Date
Single Phase - 17 private for sale & 5 affordable	12/2025	12					11/2026
Project Start	12/2025	Fees Start	12/2025	Duration	12 Mths	Project End	11/2026

Development Summary

Unit Sales					9,462,840	
Gross Development Value						9,462,840
Construction					5,034,229	
Demolition					250,000	
All other costs					784,256	
Finance					212,795	
Development Cost						6,281,279
Profit Required	20.00 %	of GDV	25.00 %	of GDC		1,892,568
Balance available					1,288,993	
Purchase costs						79,232
					Residual Land Value	1,209,761

Statistics

Land Value	1,209,761	Site Area (Acres)	2.86
Total Construction Costs	5,034,229	Total Area: Net (sq.ft.)	29,337
Interest	212,795	Total Area: Gross (sq.ft.)	29,337
Peak Borrowing	1,074,202		
Peak Debt	5,045,463	Land Value / Acre	422,698
Gross Development Costs	7,570,272	Land Value psf (net)	41.24
Gross Development Value	9,462,840	GDC excl. land psf (gross)	214.11
Development Yield on Cost		GDC incl. land psf (gross)	258.05
		GDV psf (net)	322.56
Break-even value	80.00 %	of GDV	
		Profit	1,892,568
		Net Equity	2,162,342
		Profit / Net Equity	87.52 %
		Profit as % of GDC	25.00 %
		Profit as % of GDV	20.00 %
		Profit as % of Total Construction Cost	35.82 %
		Profit / sq.ft. (gross)	64.51
		Profit / sq.ft. (net)	64.51
		IRR	40.44 %
		IRR on Net Equity	149.88 %
		NPV at 10.000 %	1,594,308

Belhaven Hospital

Capitalisation & Sales

Single Phase - 17 private for sale & 5 affordable

Net Area	29,337 s.f.	
Value at	320.00 p.s.f.	
Market Value	11/2026	9,462,840

Gross Development Value **9,462,840**

Costs

Demolition 12/2025 250,000 v

Construction

Base cost	(see schedule)	4,840,605 v	
Contingency	4.000 %	193,624	
			5,034,229

Special Costs

Planning/Building Regs	12/2025	100,000 v	
Services upgrades	12/2025	100,000	
Groundworks	12/2025	175,000	
S75 @ £10k per unit	06/2026	(10,000 x 22 sq. ft.)	220,000 v
			595,000

Post Construction

Cost of Sale	(see schedule)		189,257 v
			189,257

Finance

Compounded quarterly			
Loan interest (see schedule)	6.50 %	212,795	
			212,795

Development Cost **6,281,279**

Residual Land Value

1,209,761

Purchase costs			
Standard Purchasers Costs	1.500 %	18,146 v	
LBTT(Scotland)	5.049 % (4.208 % of Price+VAT)	61,086	
(see schedule)			79,232

Gross Development Cost			7,570,272
Profit Required	20.00 % of GDV	25.00 % of GDC	1,892,568
Gross Development Value			9,462,840

Belhaven Hospital

Schedules

Single Phase - 17 private for sale & 5 affordable

Construction Starts / Ends	12/2025	11/2026
Projected Sale	11/2026	9,462,840

	Area Net/Num	Area Gross	Sale Rate	Sale Value	Construction Rate	Construction Cost
Private for sale (17 Units)	29,337	29,337	320.00	9,387,840	165.00	4,840,605
Affordable Hosuing (5 units)	5.00		15,000.00	75,000		
		29,337	320.00	9,462,840	165.00	4,840,605
Contingency	4.00 %					193,624
Total Construction						5,034,229

VAT Schedule

	Amount	VAT %	Total VAT	Net VAT
Purchase Price	1,209,761	20.00 %	241,952	0
Construction	5,284,229	20.00 %	1,056,846	0
Acquisition & Finance	79,232	20.00 %	3,629	0
Special Costs	595,000	20.00 %	64,000	0
Post Construction	189,257	20.00 %	37,851	0
	7,357,479		1,404,279	0

Percentage of VAT recovered 100.00 % Average recovery time 3 months

Sale Fees Schedule

	Date	Rate	Amount
Single Phase - 17 private for sale & 5 affordable	11/2026	2.000 %	189,257 v
Total			189,257

Finance Schedule

	Amount or %	Rate	Starts	Months	Accrued / Paid	Profit Share	Interest
Interest	70.000 %	6.500 %	12/2025	12	Paid		212,795

Stamp Duty Schedule

Stamp Duty based on Purchase Price plus VAT - LBTT(Scotland)

Stamp Duty Bands :	From	To	Tax Rate	Taxable Amount	Duty
>	0	150,000	0.00 %	150,000	
>	150,000	250,000	1.00 %	100,000	1,000
>	250,000	and higher	5.00 %	1,201,713	60,086
			4.21 %	1,451,713	61,086

Assumptions

1. Interest is compounded quarterly
2. Construction related payments are made monthly.
3. Purchase and any rent are paid in advance, at the beginning of a month.
4. All other costs are paid in arrear, at the month's end.
5. Sales take place at the end of the month.
6. YPs are calculated on the basis of rents received annually in arrears (Parry's).
7. VAT is applicable to items marked "v"
8. Rent is paid quarterly in advance.

APPENDIX 2

PLANNING APPRAISAL

SUMMARY DESK-BASED PLANNING APPRAISAL

NHS BELHAVEN HOSPITAL
BEVERIDGE ROW
DUNBAR
EH42 1TR

AUGUST 2025

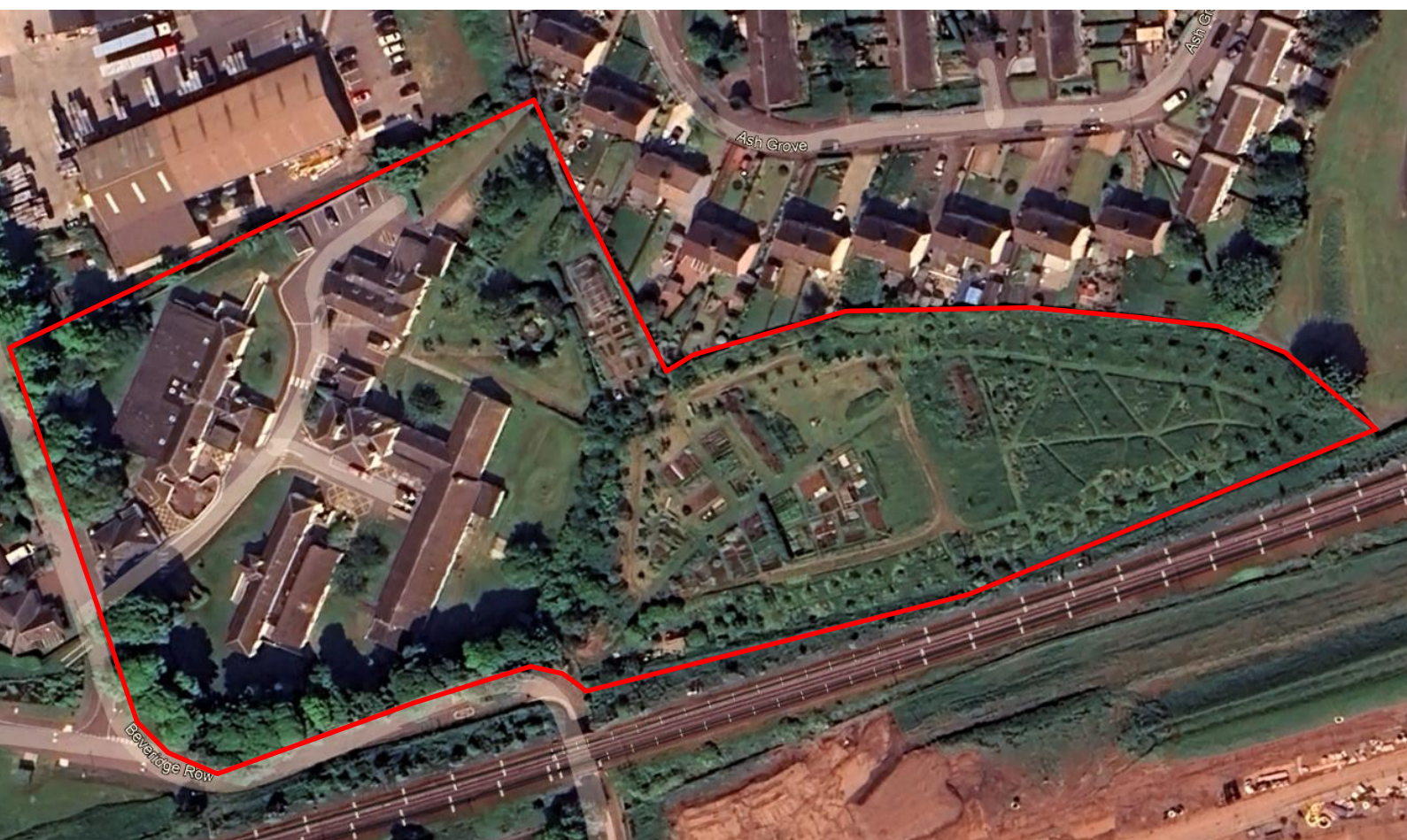
Ryden

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- 02** THE SITE
- 03** PLANNING FRAMEWORK
- 04** KEY ISSUES
- 05** DEVELOPMENT POTENTIAL
- 06** SUMMARY & CONCLUSIONS

01 INTRODUCTION

- 1.1 Ryden has been appointed by NHS Lothian to advise on the disposal of their Belhaven Hospital site in Dunbar, East Lothian. As part of the assessment of development potential, we have considered initial planning policy issues, constraints and opportunities.
- 1.2 This summary report has been prepared by Robert Evans, MRICS MRTPI, Partner and Head of Planning.
- 1.3 The following report sets out the relevant planning considerations which may inform the market value. This is based on a desktop assessment and a review of existing planning policy and guidance at local and national level. No site visit has been undertaken at this stage.



02 THE SITE

- 2.1 The site extends to some 2.01 ha and comprises hospital buildings to the west and the Belhaven Community Garden to the north and east. The eastern field is slightly sloped, rising generally from east to west.
- 2.2 The site is located approximately 1.5 km west of Dunbar Town Centre and Dunbar Train Station. The site is a 5-minute walk from the X7/120 bus stop on High Street A1087 with routes to the town centre.
- 2.3 The surrounding uses are generally residential apart from Belhaven Brewery directly to the north west. The site is bounded by the brewery to the north-west, residential dwellings to the north-east, public open space to the east, Beveridge Row and the East Coast Main Line railway to the south and residential dwellings to the west.
- 2.4 There is existing vehicular access from Beveridge Row and pedestrian access from Pine Street to the north.
- 2.5 Initial review of SEPA Flood Risk maps indicate that there is a medium risk of fluvial and surface water flooding on site each year.
- 2.6 There are no listed buildings on the site and it is not in a conservation area.
- 2.7 There are no other specific environmental designations on the site.

PLANNING HISTORY

The planning history below is summarised from East Lothian Council's Planning Portal.

- 2.8 **01/00425/OUT** - Outline planning permission for housing development – GRANTED (not implemented).
- 2.9 **13/00438/P** - Change of use of hospital ground and agricultural land to form a community garden and associated works (retrospective) – GRANTED (implemented).
- 2.10 In addition, the adjacent site (South of Railway line) is subject to **20/00110/PM** - Erection of 197 houses, 48 flats and associated works – GRANTED (implemented).

03 PLANNING FRAMEWORK

- 3.1 This summary assessment and initial due diligence report is on the basis of assessing the site's suitability and potential for residential development.
- 3.2 No schematic or conceptual layouts have been reviewed and this summary report simply assesses the principal of redevelopment and key planning issues.

LEGISLATIVE AND POLICY FRAMEWORK

- 3.1 Section 25 of the Town & Country Planning (Scotland) Act 2007 (as amended) directs that planning applications should be determined in accordance with the adopted development plan unless there are other material considerations that justify otherwise. The development plan comprises National Planning Framework 4 (adopted in 2018) and the local development plan (LDP) – East Lothian Council's Local Development Plan (adopted in 2018). If there is any policy tension or conflict, the most recent part of the Development Plan (in this case NPF4) will take precedence.
- 3.2 We also suggest that NHS monitor the review of the East Lothian LDP and make representations as appropriate to protect the existing allocation.
- 3.3 Other material considerations include the planning history and national policy guidance.

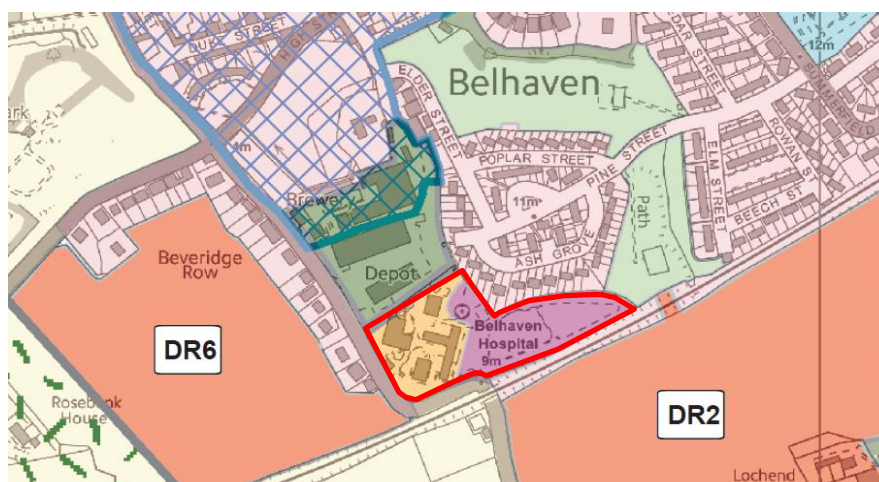
National Planning Framework 4 (NPF4)

- 3.4 NPF4 guides Scotland's spatial development and sets out its strategic development priorities to support the overarching objective of promoting sustainable economic growth, net zero objectives and 20 minute neighbourhoods.
- 3.5 The key policy references of NPF4 are set out below.
- 3.6 **Policy 1 & 2: Tackling the Climate and Nature Crises** - development proposals must demonstrate how they will minimize greenhouse gas emissions and deliver significant biodiversity enhancements, using nature-based solutions where possible.
- 3.7 **Policy 3: Biodiversity** - development must be designed to enhance and protect biodiversity, and provide net-positive effects for nature, including strengthening habitat connectivity.
- 3.8 **Policy 5: Soils** – to protect carbon-rich soils, restore peatlands and minimise disturbance to soils from development.
- 3.9 **Policy 6: Trees** – to protect and expand forests, woodland and trees.

- 3.10 **Policy 9: Vacant and Derelict Land** - supports the reuse of brownfield land, including vacant and derelict buildings, to reduce the need for greenfield development.
- 3.11 **Policy 12: Sustainable Transport** - to encourage, promote and facilitate developments that prioritise walking, wheeling, cycling and public transport for everyday travel and reduce the need to travel unsustainably.
- 3.12 **Policy 14: Design, Quality and Place** - development proposals must contribute to the creation of high-quality, distinctive, and sustainable places that promote local living, health, and well-being. Homes should be located near to existing education and healthcare infrastructure.
- 3.13 **Policy 16: Quality Homes** - supports the delivery of homes of all tenures by identifying sufficient land supply, with a strong presumption against new housing on unallocated land unless specific, limited circumstances apply.
- 3.14 **Policy 17: Affordable Housing** - requires all local authorities to set an affordable housing policy, including a minimum percentage of affordable homes for all major housing developments.
- 3.15 **Policy 22: Flood Risk and Water Management** - development proposals must avoid areas of medium to high flood risk and demonstrate that they will not increase flood risk elsewhere, while making effective use of water and reducing demand.
- 3.16 **Policy 23: Health and Safety** – To protect people and places from environmental harm, mitigate risks arising from safety hazards and encourage development which promotes health and wellbeing, such as the those which include allotments. Development proposals must not have a significant adverse impact on the residential amenity of neighbouring properties, and must provide a high standard of amenity for future residents, including consideration of sunlight, daylight, privacy, and noise.

Local Development Plan (LDP)

- 3.17 The existing hospital complex is a designated healthcare facility in East Lothian Council's Local Development Plan (2018) (shaded orange below) under Policy HSC1: Healthcare sites.



- 3.18 The field to the east is designated for 40 mainstream housing units (shaded purple above).
- 3.19 East Lothian Council is preparing a new Local Development Plan (LDP2) which is expected to be adopted in Q1 2026. The Council's proposed intentions for designating this site have not been published yet.
- 3.20 The field to the east of the site is designated as community growing space in the community-led, non-statutory, Local Place Plan for Dunbar. This would be a material consideration in the determination of any planning application. However, if the site was allocated for housing in the new statutory LDP, this designation is likely to hold more weight than the Local Place Plan in any planning decision.
- 3.21 The key policy references of the LDP are set out below.
- 3.22 **Policy HOU1: Established Housing Land** - directs most new housing development to sites that are already allocated for housing in the Local Development Plan to ensure an adequate and effective land supply.
- 3.23 **Policy HOU3: Affordable Housing Quota** - requires a specified minimum percentage of affordable housing to be provided on new housing developments to meet local needs.
- 3.24 **Policy HOU4: Affordable Housing Tenure Mix** - stipulates that a mix of tenures (e.g., social rented, mid-market rented, and low-cost home ownership) must be provided within the affordable housing contribution.
- 3.25 **Policy HSC1: Health Care Sites** – the continued use of land currently occupied by public health care facilities is supported. This policy will also apply where planning permission has been approved for the expansion of existing or provision of new health care facilities. A change of use will only be permitted if the Council, in consultation with NHS Lothian and the East Lothian Health and Social Care Partnership, is satisfied that the existing use is no longer required and its loss will not prejudice the availability of land for health care in East Lothian.
- 3.26 **Policy T1: Development Location and Accessibility** - new developments shall be located on sites that are capable of being conveniently and safely accessed on foot and by cycle, by public transport as well as by private vehicle, including adequate car parking provision in accordance with the Council's standards. The submission of Travel Plans may also be required in support of certain proposals.
- 3.27 **Policy T2: General Transport Impact** – new development must have no significant adverse impact on road safety and road network capacity.
- 3.28 **Policy NH13 – Noise** – the impact of noise will be taken into account when assessing relevant development proposals, particularly those that are close to or could become a source of noise.

- 3.29 **Policy INF1: Infrastructure Provision** - all new developments must be supported by the necessary infrastructure, and developer contributions will be sought to mitigate the impact of the development on transport, education, and other services.
- 3.30 **Policy OS3: Minimum Open Space Standard for New General Needs Housing Development** - sets a minimum standard for the provision of open space within new housing developments, including areas for children's play, to ensure adequate recreational opportunities for residents.
- 3.31 **Policy DP1 – DP8 – Design and associated guidance** - provides detailed requirements on the design of new housing developments, including landscaping/amenity space and standards to ensure a high quality of residential amenity for existing/future occupiers.

04 KEY ISSUES

- 4.1 Based on the location and characteristics of the site, there are a number of key planning issues that require to be assessed and addressed including:

- Principle of use;
- Access and accessibility/pedestrian links;
- Flood risk/drainage;
- Proximity to railway line – noise and vibration;
- Odour – from existing brewery operations;
- Existing community garden use;
- Trees/landscaping; and
- Education capacity.

PRINCIPLE OF USE

- 4.2 A portion of the site is designated for health care facilities and a portion of the site is designated for housing in the LDP (2018). Given that NHS Lothian no longer requires the land for its current use, East Lothian Council may consider changing the designation in the new LDP2. In order to justify this, the Council would need to consult with NHS Lothian and the East Lothian Health and Social Care Partnership, satisfying themselves that the existing use is no longer required and ensuring that its loss will not prejudice the availability of land for health care in East Lothian.
- 4.3 Given that the eastern portion of the site is designated for 40 residential units in the current LDP, it is likely that the Council will continue to designate this land for housing in the new LDP2. However, local community interest in retaining Belhaven Community Garden (as designated in the Dunbar Local Place Plan) will be a material consideration for the Council in their preparation of the next LDP2.

ACCESSIBILITY

- 4.4 There are two points of access into the site off Beveridge Row. The main point of vehicular access into the hospital is shown below.



- 4.5 If the site was to be redeveloped, this junction would likely be suitable as a main point of access for a residential development of less than 150 units. It is recommended that a transport consultant is appointed to confirm this and assess requirements for visibility splays.
- 4.6 There is a second access point on Beveridge Row which is constrained by a section of signalised single carriageway. This access point is less likely to be suitable for vehicular access but may be suitable for pedestrian access (shown below overleaf):



- 4.7 East Lothian Council Roads Officers have historically shown interest in delivering a formalised footpath diagonally across the field from this access point on Beveridge Row. This would provide a more convenient route to school from the emerging Belhaven Way housing scheme (20/00110/PM) to the south of the railway line. Future residential developments on the Belhaven Hospital site would likely be required to provide a similar such pedestrian link.
- 4.8 There is existing pedestrian access to the north of the site from Pine Street which should be retained.
- 4.9 The site is within walking/cycling distance of local schools, shops, bus stops and Dunbar train which is likely to accord with NPF4 Policy 12 – Sustainable Transport and NPF4 Policy 14 - Design, Quality and Place.

FLOOD RISK

Surface water flood risk.

- 4.10 SEPA Flood Risk mapping indicate that the central portion of the site is at 'medium' risk of flooding each year from high rainfall and low lying topography.

Fluvial (watercourse) flood risk

- 4.11 SEPA maps also indicate that the central portion of the site is at 'medium' risk of flood each year. Subject to further survey work, it is understood that this risk may derive from Biel Water (a local watercourse).
- 4.12 While surface water flood risk can sometimes be 'designed-out' by altering site levels as

part of a redevelopment, SEPA typically requires that development should be avoided on identified floodplains associated with fluvial flood risk / the catchment of watercourses.

- 4.13 It is recommended that a flood risk consultant is appointed to carry out a Stage 2 Flood Risk Assessment. This would provide greater accuracy on the potential floodplain and provide implications for the usable 'developable areas', taking cognisance of stand-off requirements and demonstrating compliance with NPF4 Policy 22 – Flood Risk and Water Management.
- 4.14 Areas of the site which cannot be developed could be used for landscaping, amenity space and/or community benefit.
- 4.15 It is recommended that a utilities survey is undertaken in order to understand the below-ground location of existing assets such as public sewer pipes in order to inform stand-off requirements and foul water drainage connections.

NOISE AND VIBRATION

- 4.16 A stand-off zone will be required between the East Coast mainline railway line and proposed residential development in order to mitigate the impact of noise and vibration on future occupiers. It is recommended that a specialist consultant is appointed to assess impacts and stand-off requirements in order demonstrate compliance with NPF4 Policy 23 – Health and Safety.
- 4.17 The stand-off between the railway and residential development to the south **(20/00110/PM)** is approximately 15-20 metres. This development includes a bund and acoustic fence which serves as mitigation.
- 4.18 A stand-off zone adjacent to the railway could be used for landscaping, amenity space and/or community benefit.

ODOUR

- 4.19 Odour impacts from Belhaven Brewery will be required to be assessed as part of any proposal for residential development. It is recommended that a specialist consultant is appointed to carry out an Odour Impact Assessment in order demonstrate compliance with NPF4 Policy 23 – Health and Safety.

BELHAVEN COMMUNITY GARDEN

- 4.20 Sustaining Dunbar have been running a community garden on the land since 2012 with agreement from NHS Lothian. This site layout is shown below overleaf (sourced from Sustaining Dunbar's website).



4.21 The main hub of the community garden includes a polytunnel, raised beds and a sensory garden which was designed for the benefit of hospital patients.

4.22 The photo shown below of the polytunnel and raised was sourced from Sustaining Dunbar's website.



- 4.23 The field to the east of the site is designated as community growing space in the community-led, non-statutory, Local Place Plan for Dunbar. This would be a material consideration in the determination of any planning application. However, if the site was allocated for housing in the new statutory LDP, this designation is likely to hold more weight than the Local Place Plan in any planning decision.
- 4.24 Development proposals which include provision of community growing space would be in accordance with NPF4 Policy 23 – Health and Safety.

TREES

- 4.25 A number of trees have been planted around the site over a number of years. The maturity of these trees are not known but proposals will need to consider this. It is recommended that a tree survey is carried out in order to understand site constraints and opportunities. This will help shape development proposals in line with NPF4 Policy 6 – Trees.

EDUCATION CAPACITY

- 4.26 School roll predictions of Dunbar Primary School, West Barns Primary School and Dunbar Grammar School should be assessed in order to understand future capacity. This will have implications for the LDP allocation and developer contribution requirements.

ENVIRONMENTAL IMPACT ASSESSMENT (EIA)

- 4.27 The proposal could fall within Schedule 2 of the Town and Country Planning Environmental Impact Assessment (Scotland) Regulations 2017 and as such should be subject of formal 'Screening' and 'Scoping' as necessary. Overall the site is not subject to any specific environmental designation and the nature of the proposal should not in itself by virtue of construction or operation cause undue significant environmental impacts. Formal EIA should therefore not be necessary but this should be confirmed as early as possible.

05 DEVELOPMENT POTENTIAL

- 5.1 There are a number of potential site constraints including flood risk, a railway stand-off zone, existing community uses, trees and potential odour from the operation at Belhaven Brewery.
- 5.2 Given the existence of a potential flood plain in the northern/central portion of the site and stand-off zone requirements along the railway line, it is possible that these areas would not be developable. However, this land could be used for landscaping, amenity space and/or community benefit.
- 5.3 Notwithstanding this, the initial appraisal suggests that a substantial portion of the site (comprised of existing hospital buildings and grassland) could be suitable for residential development.
- 5.4 It is recommended that further technical assessments are carried out in order to understand the full extent of potential constraints and mitigation measures required. These include:
- Site Engineering Appraisal/Utilities Survey;
 - Stage 2 Flood Risk Assessment;
 - Odour Impact Assessment;
 - Noise/vibration Impact Assessment;
 - High level Site Engineering Appraisal; and
 - Access Technical Note.
- 5.5 It is recommended that NHS Lothian makes contact with East Lothian Council's Planning Department to discuss health care land supply requirements across the local authority. This will inform how the site should be allocated in the new Local Development Plan.

06 SUMMARY

- 6.1 Any proposed redevelopment will require a clear planning strategy including initial dialogue with key politicians, community groups and Council officers.
- 6.2 Planning policy issues will be clearly defined on the basis of:
- Policy justification depending on future LDP allocations;
 - Quality of Design; and
 - Climate and Biodiversity objectives.
- 6.1 The key planning issues relate to the principle of use; access and accessibility/pedestrian links; flood risk/drainage; proximity to railway line – noise and vibration; odour – from existing brewery operations; existing community garden use; trees/landscaping; and education capacity.
- 6.2 The site represents a good opportunity for residential development, however the developable area and market value will be informed by an understanding of the planning constraints. It is recommended that further technical studies are required to support this initial appraisal.
- 6.3 The site is well located within a wider residential area of mixed housing types and styles. It is well connected to community and social facilities and represents a suitable location for residential development in accordance with '20 Minute Neighbourhood Principles'.
- 6.4 There are opportunities to link with the adjacent road network, enhance pedestrian connectivity and provide direct links to existing open space and local shopping and community facilities. There is ample opportunity for enhanced landscape structure, boundary treatment, open space and play provision.
- 6.5 A well designed residential masterplan which takes into account site constraints and opportunities is likely to be supported by East Lothian Council Officer and Councillors. Collaboration with Belhaven Community Garden in the development of a masterplan which includes provision of community growing space is likely to be considered favorably in the determination of any future planning application.
- 6.6 As above, it is recommended that NHS Lothian makes contact with East Lothian Council's Planning Department to discuss health care land supply requirements across the local authority. This will inform how the site should be allocated in the new Local Development Plan.

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