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Additional information:

This attachment is an appendix to the report entitled Responses to Consultation on the Main Issues Report and Interim Environmental Statement for the East Lothian Local Development Plan submitted to East Lothian Council on 21/4/15.

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local development plan
main issues report & interim environmental report

consultation feedback: summaries and key messages

april 2015

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1 Introduction

- 1.1 The consultation period for East Lothian Council's Main Issues Report (MIR) and Interim Environmental Report (IER) ran from 17th November until 8th February 2015. The purpose of the consultation was to raise awareness of the consultation; to engage with people; to inform them of the background to, scope and purpose of the documents so they could form opinions, and ultimately to encourage consultation responses.
- 1.2 The Council is committed to effective engagement. For the consultation exercise a strategic communications plan was developed to guide activities. In addition to the statutory publication requirements for these documents, online and offline channels were used including direct contact with individuals and local groups, print and online advertising, posters and press releases, and use of social media. A video was also produced to clearly and succinctly explain the complex key issues and context. It was placed on the Council's website alongside the consultation documents.
- 1.3 As a further part of this consultation work, a series of six consultations events were held in each of East Lothian's main towns early in the consultation period from 17th November to 8th December 2014. These events comprised afternoon drop-in sessions and evening workshops where attendees could view and discuss with Council officials the MIR's proposals as well as the associated IER.
- 1.4 Following the afternoon drop-in sessions, facilitated workshops were held in the evenings for more focused topic based discussion. They opened with an introductory presentation and a screening of the video. These were used to summarise the stage in the plan-making process the Council had reached, the timeline for the preparation of the Local Development Plan and to provide an overview of the purpose and content of the MIR and IER. Attendees then moved to workshop discussion tables of their choice to discuss topics of interest to them in greater detail.
- 1.5 The drop-in and workshop sessions were facilitated by members of staff from the Council's Planning Service. Officers from other Council departments including Economic Development, Asset Management, Transportation and Corporate Policy also attended to provide specialist advice where required, and to facilitate, participate and engage with attendees and report findings back to the group.
- 1.6 The consultation period remaining following the events allowed people to consider the documents and community groups to meet and discuss them and the events (if appropriate) in order to formalise their views before submitting a formal response by the close of the consultation period. Overall, 171 people attended workshops, with many others attending the drop in sessions. The Council has received 1,001 responses to its MIR and IER.
- 1.7 Planning staff also attended and presented the MIR and IER to meetings of the six Area Partnerships in January and February, specifically dedicated to the MIR

consultation. The Area Partnerships all subsequently submitted formal responses to the MIR consultation.

- 1.8 A 'Rural Voice' event was also held in Haddington on January 26th to discuss the MIR with an invited audience of those with an interest in the rural area. Council planners were in attendance to answer questions. Attendees were encouraged to submit responses individually.
- 1.9 This report describes the approach taken and summaries the key messages from the consultation. The report is separated in to two parts: **Part A** deals with the **Workshop Events** and **Part B** deals with the **Formal Consultation**.

2 Part A: Key Messages from Workshop Events

Pre-consultation Work

2.1 East Lothian Council engaged Planning Aid Scotland (PAS) to design and deliver 10 pre-Main Issues Report consultation events across the county's main settlements. The events took place in February 2012 and were intended to enable effective engagement with organisations and individuals from a wide range of sectors that would guide the Main Issues Report development and consultation.

Progressing Engagement on the MIR and IER

2.2 In its final report, PAS made a series of general recommendations to the Council for future engagement exercises. These recommendations have guided the Council's approach to communicating and engaging with communities during the MIR and IER consultation process. In particular:

- Creative ways for people to discuss and engage with the issues on their terms;
- Circulate notes from the workshops after the events;
- Make best use of local networks to raise awareness of the consultation;
- Use normal 'public friendly' and jargon-free language with simple messages;
- Consider normal advertising not just statutory adverts;
- Consider suitability of venues for public consultation events;
- Greater staff presence from the planning department at events to understand the issues first hand, engage in dialogue and build trust amongst attendees;
- Include a short analysis of each settlement (and the main issues facing it) so that information was tailored to the area.

2.3 These recommendations were implemented in the Council's approach to the MIR and IER and the associated consultation process.

The Purpose of Engagement

2.4 The purpose of the MIR and IER consultation was to raise awareness of the consultation and to inform people of the background to as well as the scope and content of the documents. This was to help them form views and opinions before their formal responses were submitted. A programme of activities was planned to encourage engagement on the MIR and IER. Specifically these activities sought to:

- Raise awareness of the MIR and IER within East Lothian;
- Encourage attendance at the consultation events and workshops;
- Explain the background to, and themes within, the documents;
- Encourage people to respond to the consultation.

The Four Key Messages

2.5 The key messages employed in all communications were:

1. The consultation is an opportunity to help shape the future development of East Lothian and we want to hear views during the consultation process on our proposals;
2. The requirement for new development, including 10,050 new homes by 2024 and providing land for employment (along with the necessary infrastructure and transport requirements) is required because the Council must meet its statutory requirements. The consultation is an opportunity to express views on how and where these requirements could be met;
3. 'Preferred' and 'alternative' are terms outlined by Scottish Government and these and 'other site options' were identified where the Council wished to consult on potential development locations as a starting point for discussion;
4. No decisions had been taken and responses to the consultation will be taken in to account in the preparation of the Council's Proposed LDP.

2.6 All consultation materials directed audiences to the appropriate channel for information (e.g. website or local information point) and where and how to make responses (e.g. consultation hub and planning policy team).

The Methods & Channels of Engagement

2.7 The MIR and IER documents contain a wide range of issues and proposals for development in East Lothian. It was recognised that this would result in a wide range of audiences with different communication needs (including access to information) and levels of understanding of the planning system.

2.8 An exercise was undertaken to map audiences and the channels of communication that could be employed to meet their needs and to encourage meaningful engagement as set out below.

Overview of Main Issues Report & Interim Environmental Report Communication Channels		
	Audience	Communication Channels
Statutory Audience	Statutory consultees – including Government agencies, health and infrastructure bodies, local authorities, community councils.	<ul style="list-style-type: none"> • Statutory advert in local papers; • Direct information sent by email or post where email address not available; • Posting of reports (electronically and hard copy where appropriate).
Wider Audiences	East Lothian residents East Lothian tenants 'Engaged citizens' Elected members Businesses Developers, landowners and	<ul style="list-style-type: none"> • Information emailed either directly or through local networks/contacts; • Advertising placed in local papers on news pages and online banner advertising; • Press releases sent to print media –

	Agents Local press Council staff	aimed at news pages and individual area pages; <ul style="list-style-type: none"> • Spokesperson provided to local radio (East Coast FM) for community segment; • Advertising posters placed in local facilities; • Display information placed in local facilities; • Articles prepared for audience-specific publications (<i>Living, Business Buzz, Homefront, ELTRP News</i>); • Online engagement through Council website, Twitter and Facebook, and through partner agencies websites where appropriate; • Reports to Council meetings – meetings are public with local press in attendance and minutes are published online; • Briefing of newspaper editors before and after the consultation period.
Other Stakeholders	Community Planning Partners MSPs Other agencies	<ul style="list-style-type: none"> • Direct information sent by email or post where email address not available.

2.9 A full breakdown of all activities undertaken is available in Appendix 4 & 5. The key activities are highlighted here:

1. **Local press:** engagement with the local press took place in a number of ways. Informal yet informative briefings were held with representatives from each of the two main local papers (East Lothian Courier and East Lothian News) before the consultation began and after it closed. As well as the statutory adverts, advertising was booked in the news pages of both papers. This was colourful, brief and written in plain English to highlight the public events and workshops. Banner advertising was also booked on the East Lothian Courier’s website front page. News releases were issued at the key stages in the process, to update on local events and to encourage attendance and responses.
2. **Stakeholder networks:** the Council used its own publications and networks wherever possible. A four page supplement was added into Living Magazine, the Council’s own newspaper. It was sent to 47,000 households across the county ahead of the consultation’s launch. Written in plain English for a general audience this offered information on the report, its context, and described the issues on an individual cluster basis. The consultation timescales and how to get involved were set out. Information was also included in other Council publications (*Homefront* and *Business Buzz*), in staff briefings and provided to external partners where requested. Information was emailed directly to

databases of contacts held by appropriate Council departments including businesses, community councils and Citizens Panel members.

3. **Twitter:** this was used throughout the consultation process to inform the public, encourage attendance at events and consultation events (see Appendix 7). The 10 tweets sent throughout the process were seen by 11,007 twitter users with the top three tweets with the highest engagement (click through) relating to Cockenzie Power Station site FAQs (4.9%), Cockenzie Energy Park Environmental Impact Assessment (4%) and the launch of the MIR and IER consultation (3%).
4. **Video:** as part of the Council's commitment to encouraging engagement with the MIR and IER and their contents, a short video was produced by members of the Council's planning policy team. The video combined photographic stills of East Lothian and maps taken from the MIR with a voiceover explaining the context of the consultation and its challenges, the Council's preferred 'compact' approach and the alternative 'dispersed' strategy, and other aspects of the consultation. This was available online on the Council's dedicated on-line hub and also shown at the start of each of the public meetings. The online version has now been viewed around 400 times.
5. **Website:** a dedicated 'quick links' address was created on the Council's website to make it as easy as possible to find information: www.eastlothian.gov.uk/mir . This sub-site included all information and downloads related to in the consultation as well as staff contact details. The quick links address was used on all promotional posters and materials. The MIR consultation was promoted on the front page of the Council's website for the full 12 weeks and banner advertising was also booked on the East Lothian Courier's website front page to encourage participation.

Overview of MIR & IER Consultation Events & Workshops

- 2.10 A key part of the engagement was a series of events held across each of the county's six main towns. The events combined afternoon drop-in sessions where members of the public (and others) could review the MIR proposals and IER and speak with a member of the planning team.
- 2.11 Evening workshops were then held so that participants could consider the issues and proposals in more depth. Participants were asked to register for the evening events in advance to ensure they were properly resourced and managed. In advance of and on arrival at the evening sessions, attendees were asked to choose three themed discussions to participate in with each discussion lasting 25 minutes.
- 2.12 This was so they could indicate topics that were of particular interest to them and provision could be made for them to participate in the workshop sessions most relevant to their interests.

- 2.13 The workshop sessions began with a short presentation and video that explained the stage in the plan making process the Council had reached, the timeline for the preparation of the Local Development Plan, the background to the MIR and IER and an overview of the main issues, challenges and proposals. A planning official then made a brief presentation outlining the main proposals for the area, including the local area in which the workshop was being held, followed by a short question and answer session.
- 2.14 Attendees then moved to the workshop tables of their choice to discuss topics of interest to them. These facilitated discussion workshops focused on a series of themes, reflecting the options for addressing the 'main issues' facing East Lothian as set out in the Main Issues Report as follows:
- Spatial Strategy;
 - Planning for Employment and Town Centres;
 - Planning for Housing;
 - Environment, Placemaking and Green Networks;
 - The Rural Area;
 - Transport, Education and Infrastructure.
- 2.15 The Prestonpans event also held a special discussion table on the Cockenzie Power Station site in recognition of the significant interest in this subject in that area. Young people also discussed the MIR at the Fa'side Area Partnership's Young Persons Sub-group in Tranent on 9th December 2014.
- 2.16 Council officials from planning policy, strategic assets, economic development, education and transportation facilitated the workshop tables. Cross-council representation ensured a wide-ranging and informative discussion at each session. The workshop event was lead by members of staff from the Council's Policy and Community Development teams. The discussions were noted and key points communicated to attendees at the close of the event.
- 2.17 Attendance was open to all members of the community. Registration was required through Eventbrite to ensure that the workshops were properly resourced and managed. A report from Eventbrite showed that overall 171 people registered to attend the workshops, with North Berwick the most popular event (53 people). Haddington attracted the fewest attendees (14). Actual attendance was broadly similar to these figures; a small number of registered participants did not attend, however this was roughly balanced by small numbers of unregistered people 'on the door'. An over view of the feedback from each event is provided below the following section.

Overview of Event Feedback

Musselburgh Cluster

Spatial Strategy

- Participants tended to prefer the dispersed strategy. One participant recommended extending the compact area to include Haddington, Drem and East Linton, accepting the principle of compact development makes sense when a new secondary school facility is likely necessary. Some participants felt that the compact strategy accepts that everyone is heading to Edinburgh and development should be evenly spread to encourage people to live and work in the county. Concerns were raised regarding coalescence and lack of open space between settlements and overall congestion caused by population increase if the compact strategy was adopted. Respondents felt that the strategy should encourage use of public transport and active travel and that there are other parts of the county with good public transport links to Edinburgh, as well as East Linton with a proposed rail station.

Planning for Employment and Town Centres

- Education implications for a mixed use development around Queen Margaret University were discussed. The negative impact on green belt land was highlighted by participants, while clarification was required on the definition of 'mixed use'. One participant felt that the employment projections were too ambitious pointing to unused units at Fisherrow and Newhailes. The impact on infrastructure to support such a site was also debated. The changing retail environment was discussed as part of the challenge facing town centre retailers, with participants highlighting the need to support a sensitive change of use in town centres – supporting social activity, allowing housing if no retail use could be found, while maintaining vibrancy and re-using empty upper floors. The impact of traffic congestion was also highlighted.

Planning for Housing

- There was general recognition that housing does need to be allocated in East Lothian, however all groups expressed concerns of the negative impacts of coalescence on the overall character of the county and the identity of individual towns. The implications on transport networks were discussed, not just on the road network but also on rail infrastructure. Discussions highlighted the importance of not just managing increased car use resulting from new homes, but reducing the need to travel/ promoting public transport. Attendees highlighted the importance of space so that people could walk between developments to promote accessibility but to maintain the 'separateness' of settlements. Goshen was highlighted as an important natural and heritage resource which should be protected.

Rural Area / Environment, Placemaking and Green Networks

- Respondents raised concerns about coalescence and lack of green space resulting from the compact strategy. Groups felt that the green belt was an important resource that should be preserved both to maintain green space and prevent coalescence. The impacts on the transport network were discussed with respondents highlighting rural roads inability to cope with increased pressures that rural development may generate. Respondents queried why Musselburgh Lagoons were not given the same designated protection as green belt land.

Transport, Education and Infrastructure

- The groups discussed the implications on health services, asking whether the MIR and Community Plan had been integrated and querying how health facilities could be delivered given current NHS funding. The wider economic environment was also highlighted, with participants expressing concerns about developers' abilities to pay developer contributions and the impacts this could have on delivery. The impact of development on traffic levels and traffic management in and around Musselburgh was highlighted with discussion touching on the need for macro solutions to be found for this issue. Residents questioned whether large housing allocations should have their own smaller secondary schools as seen in Edinburgh, while one respondent expressed that the compact strategy would enable all options for education capacity to be realised.

Prestonpans Cluster

Spatial strategy

- There were concerns raised about further housing in the cluster and the perception that the east was 'getting off lightly', concern about the impact on transport networks resulting from Blindwells, as well as loss of green space resulting from the compact strategy: an alternative site for a new settlement on land south of Gladsmuir was suggested for development.

Planning for Employment and Town Centres

- Great emphasis was placed on having an environment that supports small retailers and local businesses and creates jobs. Cockenzie Harbour was mentioned several times as a place for mixed use development. Importance was placed on having the correct infrastructure (roads / parking) in place to support development - an overall plan. Several groups discussed the prospect of a "shopping village" at Blindwells, similar to Fort Kinnaird, as a way to create jobs and keep expenditure in East Lothian. However, there were concerns raised about the impacts this could have on the traffic network and on small local businesses and potential loss of green space.

Planning for Housing

- Views were heard expressing support for both compact and dispersed growth strategies. While some respondents felt that Prestonpans had no more space for housing, other participants expressed that concentrating development near existing transport networks (primarily to Edinburgh) made sense. The need for affordable housing was also mentioned. There was general support for development of the Blindwells site, with the necessary infrastructure to support it.

Environment, Placemaking and Green Networks

- The importance of maintaining green spaces was highlighted, especially at the 'Greenhills', Musselburgh Lagoons and at Goshen. Protecting battlefields and maximising the potential of existing harbours was discussed. Lower speed limits were felt to be critical to make liveable spaces, along with careful development which encouraged space around houses and from roads. The area was felt to have good opportunities for tourism – wildlife and heritage attractions as well developing the Ash Lagoons. However, concerns about the effects dredging in the Forth could have on the coastline were also raised.

The Rural Area

- Concerns were raised about the erosion of greenbelt land and developing on prime agricultural land with one attendee commenting that priority should be given to infilling brownfield sites. Concerns regarding coalescence were also cited by a number of attendees, with a need to retain the identity of settlements expressed.

Transport, Education and Infrastructure

- Concerns about the impacts on education provision were cited by several participants, who highlighted the importance of accurate population projections for developing infrastructure, including the likely impact on school rolls.

Cockenzie Power Station site

- Concerns were raised about the size and scale of the proposed development by Scottish Enterprise, its hours of operation and resulting noise and pollution. Residents were also concerned about the potential negative impact of the port on the coastline from dredging of the sea bed. Attendees discussed the importance of the site's green space for recreation and leisure use currently available for community use, and expressed concerns about the loss of the historic battlefield site. It was felt that the proposed development would result in the two communities merging in a completely unmanageable way. Residents questioned the economic viability of Scottish Enterprise's proposal in light of developments at Methil and Hull. Proposed job numbers were discussed amongst participants, as well as the implications for the site if the development did not progress. Alternative proposals for the area put forward were a hotel and conference centre, tourism centre (with the

Battle of Prestonpans); it was noted that Rosyth had begun a similar regeneration development. Council officials clarified the Council's role as planning authority and that no applications had yet been received. They also clarified the stages of the planning process and highlighted the Council's cross-party working group's role in balancing the needs of the communities with the Council's statutory responsibilities. The Group, which brings together Councillors from all parties with council officials, meets to consider emerging proposals for the site, to ensure all potential opportunities are identified and to encourage engagement activity.

Tranent Cluster

Spatial Strategy

- Broadly, participants favoured the dispersed strategy due to a number of concerns including coalescence of settlements, desire to see sustaining development in small villages across the county and concerns that the compact strategy would further exacerbate issues of multiple deprivation in the west of the county. There was also a belief expressed that development should make better use of train stations at Longniddry, Drem and potentially East Linton should the new station proceed. Some participants did favour the compact strategy due to emissions impacts. However emissions from commuting to Edinburgh were only a concern as long as people commute by car, and it was felt that effort should be made to change this behaviour pattern. There was support for the new settlement at Blindwells although concerns regarding transport infrastructure were raised. Other comments made by the groups concerned coalescence, a desire to see more plans for the county's rural south, and ensuring that rural areas are recognised as important for the economy.

Planning for Employment and Town Centres

- Discussions centred on employment land and issues/priorities for town centres. The kind of employment is key – Windygoul, Macmerry Industrial Estate, Muirpark and Elphinstone research centre were all discussed. The implication on the transport network from the creation of employment land was considered within Tranent and the approach to Edinburgh: it was felt that more local employment was needed to mitigate the pressures. Macmerry was highlighted as having easier access and a demand for sites, but there was uncertainty over the role of Blindwells within this, with some people favouring the creation of a distinct community. Air quality, access to parking and the provision of community facilities were highlighted as important requirements that required to be addressed within town centre sites.

Planning for Housing

- There was some support for the dispersed strategy as opposed to the 'preferred' compact strategy; attendees felt it was important that this was coupled with business and employment opportunities to the east of the county to promote sustainable communities not just in commuter towns. Although there was general

support for an increase in housing supply in Tranent, and an understanding of the reasons why, there was considerable concern about the impacts on traffic congestion especially in the town centre. The likely costs of providing the necessary infrastructure and the impacts this would have on the Council's budgets were of concern. The potential volume of housing proposed for Pencaitland and its likely impact on the school were raised, while two participants highlighted the need for sensitivity around the preferred Bankpark site in Tranent. There was support for Blindwells area of search to accommodate more of the housing land required.

Environment, Placemaking and Green Networks

- Groups discussed a perceived reduction in the amount of green space available – including football pitches – for housing provision. One group felt that the proposed Longniddry site was too large and would be inappropriate. It was felt that the potential to link green spaces and cycle paths was there but not realised, and that a more robust policy was required to link biodiversity and new development. A green network should be developed around small villages to preserve their rural identity, and landscaping using native species was discussed. Additional community facilities, including facilities for young people, were felt to be required.

The Rural Area

- Support was expressed for the preferred strategy regarding open cast mining. Concerns were raised that such mining, if approved, would have dust/wind, health, environmental and pollution implications. The proposed site's proximity to Glenkinchie as a tourist attraction and on a route used by cycle groups was also felt to be inappropriate. The county's coal mining history was also considered to make East Lothian inappropriate for fracking. Sand and gravel supply projections were questioned and road access at Longyester was felt to be an issue. There was support for a Countryside Around Towns designation in the area surrounding Elphinstone. Participants also discussed the green belt as an important way to define the boundaries between city and countryside. One group expressed that while the compact strategy would be beneficial for housing it would be less positive for rural businesses. Differing viewpoints were expressed regarding development in the countryside. While some attendees highlighted the loss of prime agricultural land around Musselburgh, Goshen and Prestonpans to meet housing targets, others felt that policies could be relaxed to accommodate high quality housing using good design in the countryside if transport/congestion was not likely to be an issue.

Transport, Education and Infrastructure

- Issues discussed centred on transportation, education and the provision of community facilities. When discussing the 'preferred' compact or dispersed growth strategies, one attendee expressed concerns that Tranent could become an extension of Edinburgh under the compact strategy, while another felt that a dispersed strategy would ease the burden on road and rail links. All groups questioned the implications on education provision and school capacity specifically

at Ross High School and Ormiston Primary School. It was clarified that both schools could be expanded within their current sites to meet future housing needs. It was also clarified that developer contributions can be sought for education provision. The increasing popularity of the Wallyford Park and Ride and the requirement for a wider platform at Prestonpans Station were discussed in response to a question regarding lack of provision of a rail link to Tranent.

Fa'side Area Partnership - Young Person's Sub-group

- The Fa'side Area Partnership Young Person's sub group met on 9th December 2014 and discussed a number of key issues related to the consultation. Attendees discussed the necessity of more shops and other services, as well as increased greenery for natural landscape within the ward area. The group was strongly opposed to Opencast Coal Mining on environmental grounds and also the social impacts of potentially compulsory purchasing of properties to facilitate access. Instead, the group considered that more focus should be placed on renewable energy. There was support for the establishment of a Countryside Around Towns designation with attendees keen to see designations to the south and east of Tranent to prevent coalescence with Elphinstone and Macmerry. Concerns were raised about the suitability of the Blindwells site for major development due to the potential dangers associated with building on a previous mining site. Attendees asked to spend time specifically discussing potential plans for the former Cockenzie Power Station site. The chimneys were felt to be a major landmark which should be kept, however there was no support for a gas power station due to the emissions and reliance on fossil fuels. There was support for the establishment of a port at the site, as this may provide jobs, but it was expressed that the site should not be developed for wind turbine construction and repair if this would result in significant re-routing of the road and loss of green space.

Haddington Cluster

Spatial Strategy

- No clear agreement on compact versus dispersed growth strategies: while some attendees felt that Musselburgh already felt urban, others argued that too much development is proposed in the west. Some expressed concerns that the compact growth would lead to continuous urban sprawl around Edinburgh, others felt that the strategy was not "compact" as development would be happening across the county. One respondent felt that the scale of proposed development would cause a huge adverse change in the character of the county, regardless of what approach is taken.

Planning for Employment and Town Centres

- While one attendee supported the preferred compact growth strategy on the grounds that commute times to Edinburgh would be reduced and the county's

countryside would be protected, another person favoured the dispersed strategy especially if housing came with additional work opportunities. Existing traffic congestion and lack of parking provision in the town was discussed with concerns that this would get worse following further development.

Planning for Housing

- There was general support for expanding Haddington through the brownfield sites, however participants highlighted the importance of preserving the town centre and avoiding an increase in traffic through the town wherever possible. Participants expressed the need for a vision for Haddington that preserved the setting and was sympathetic towards the design and landscaping of any significant development in the area. The importance of providing housing in rural Haddington, not just in the town, was discussed. Concerns were expressed around education capacity and the need to plan for future development at an earlier stage. Groups expressed a need for Scottish Government to support the infrastructure requirements to make land available for housing and employment. There was General acceptance of the preferred sites set out in the MIR, and opposition for the reasonable alternatives.

Environment, Placemaking and Green Networks

- Support for green transport links and it was noted that work in this area had already been started and further consideration should be given to this area, particularly when planning new housing schemes and schools. It was felt that better signposting and publicity would further improve use. The impacts of new development on the countryside were also discussed with attendees highlighting management of waste, mineral extraction to service new developments and areas of biodiversity.

Rural Area

- Support for proposed “Countryside Around Towns” designation as an essential tool to maintain the wealth and appeal of countryside and heritage sites. The importance of having space around towns to provide a first impression of the town and give it ‘space to breath’ was highlighted. There was broad support for the Council’s existing planning policy for development in the countryside. Permitting and encouraging old buildings of architectural merit was accepted but it was felt that larger numbers of new build housing should be discouraged. Smaller developments of new build housing may be accepted alongside redevelopment of older buildings. Lack of affordable housing, transportation and technology (broadband) remain issues for people living and working in the rural area. There was uncertainty over renewables. The current approach to wind turbines was felt to be largely correct (smaller scale development primarily in the hills) but not massive farms. The impact of reflection / glare from solarfields was queried, as was the reliability of wind turbines more generally. All attendees agreed that there were aspects of the countryside that needed to be protected – either from ‘fracking’, mineral extraction/open cast coal or through a new “Special Landscape Area Status” designation.

Transport, Education and Infrastructure

- A number of questions were raised during the sessions regarding transport, parking and the provision of education and health services. Several attendees questioned the impacts on health services; it was clarified that NHS Lothian would be responsible for health provision and that these requirements would be worked through with the Proposed Plan. The impacts on education and schools were discussed; one attendee felt that the council should do more to promote e-learning and different models of education. There was discussion regarding the provision of education and infrastructure from developers' contributions and clarification on how this would be funded.

Blindwells

- Support was expressed for development at Blindwells in place of expansion elsewhere. Concerns raised about drainage and preventing subsidence at the site.

Dunbar Cluster

Spatial Strategy

- No consensus was reached regarding spatial strategy. Concerns about compact growth included: impact on Edinburgh's green belt and East Lothian becoming a commuter county with no job opportunities. The need to protect East Lothian's high quality agricultural land and to focus on strategic development sites not just along the A1 was highlighted as concerns regarding dispersed growth.

Planning for Employment and Town Centres

- All participants highlighted the importance of making land available for economic development to support job creation: Compulsory Purchase Orders were discussed by two groups as a way of making land available for this purpose. Town Centre Strategies were felt to be a good idea to help the town centre retain its unique appeal, while additional cycle lane provision was also discussed. The Spott Road mixed-use development was highlighted as a strategic site that had brought benefits to the town, however one group expressed that there should be no further retail development outwith the town centre. One group felt that the rules surrounding change of use in town centres could be relaxed to permit other commercial developments but not residential. Two groups felt that Blindwells would not have any impact on the town, and supported reopening two closed railway line under-passes.

Planning for Housing

- Support was voiced for both the compact and dispersed growth strategies; likewise while one group highlighted new housing in villages may encourage a greater number of public amenities, a second group felt that new housing should be located at Blindwells and not within villages. The high cost of housing and/or commuting to Edinburgh for work was highlighted by participants, who felt that increased council housing and properties available for rent were required. It was felt that major changes would be required to the A1 to support the ALT1 site at Eweford Farm and concerns regarding coalescence between Dunbar and West Barn were raised.

Environment, Placemaking and Green Networks

- All groups highlighted the important natural heritage, resources and appeal that Dunbar's woodland and coastline offers. It was felt that these should be protected in any future development and that the coastal paths require long-term management to protect them from erosion or storms. Concerns were raised that new housing developments block wildlife corridors and that green network connections would need to be built into new development. Reopening of an unused underpass was suggested as a way to reduce traffic to the town centre alongside increased provision of cycle paths. Groups discussed the importance of ensuring an adequate housing mix in new development – including new affordable housing – although there were differing views on where this could be situated without compromising town centre parking. Improving and integrating transport links was highlighted. Concerns were raised about access to the proposed ALT1 site, loss of agricultural land and potential coalescence between Dunbar and West Barns.

Rural Area

- Participants were generally supportive of the 'reasonable alternative' housing policy including both "like for like replacement" and "solely affordable housing". It was felt that the latter approach would have a positive impact on dwindling small villages with decreasing school rolls. The proposed "Countryside Around Towns" designation received broad support. Participants were generally opposed to open cast coal mining (in the Tranent area) due to landscape destruction and impact on emissions; they were therefore supportive of the preferred approach. The need to focus on renewable energy was discussed, however participants did express a number of concerns regarding wind farm development in the area. Although not opposed to wind farm development, attendees felt that this should not be at the expense of the landscape. Traprain Law and Dunbar Common were identified as having significant landscape value. The issue of community ownership was also considered, with some participants expressing that communities may feel more positively towards renewable developments if they benefited the community through ownership.

Transport, Education and Infrastructure

- Support was given for the 'preferred' compact growth strategy. One group continued that improvements to transportation, roads and employment opportunities would still be required, while a second group felt that they would welcome sufficient additional housing within the town if it brought employment opportunities to the area. Attendees felt that infrastructure investment should focus on keeping the town united on either side of the railway line, to reduce congestion by exploring re-opening underpasses and creating one-way systems, and to increase parking in the town centre. All groups supported greater co-ordination between bus and train timetables to increase access to public transport, as well as increase bus provision to areas within Edinburgh including the Royal Infirmary Hospital.

North Berwick Cluster

Spatial Strategy

- There was general support for the preferred compact growth strategy although recognition that the dispersed strategy could lead to a better quality of living for those in the west.

Planning for Employment and Town Centres

- Discussions in all three groups focused on the themes of development at Tantallon Road, creating business space, parking and congestion. While some participants supported mixed-use development at Tantallon, others felt that it was an unrealistic aspiration. One participant also highlighted that Tantallon would be a better option if it was nearer the train station. There was a general view expressed that more parking was needed in the town, and developer contributions should be sought to provide this. There were also concerns about congestion, with attendees expressing that development on the outskirts of the town – farm buildings and steadings providing units in a mix of sizes and uses - would relieve congestion in the town.

Planning for Housing

- All groups highlighted a need for affordable housing in the area and for existing affordable housing tied to private development to be delivered. Groups felt that housing mix and requirements should be led by need and not by private interests (developers). Particular issues raised were the reduction in housing stock due to second home/holiday lets, an interest in sheltered housing and the need for high quality, energy efficient housing. All participants expressed concerns about the implications on infrastructure resulting from development, especially increased traffic and the road network. Support for the Countryside Around Towns designation was expressed alongside the view that golf courses should not be considered 'countryside'.

Environment, Placemaking and Green Networks

- There was broad support for the creation of a new ‘Countryside Around Towns’ policy to prevent coalescence, protect areas of scientific interest and sensitive sites, and protect the character of the countryside. However not all participants were in favour. Some felt that a CAT policy was not needed due to existing policies, or such a policy could be counterproductive with developers considering other (inappropriate) areas not within the CAT designation. It was suggested that CAT could allow for green network areas under Central Scotland Green Networks and participants questioned whether CAT should have more powers than DC1.

Rural Area

- Some participants supported the current policy approach. The need for developing affordable housing in the countryside was discussed within the context of high prices deterring farm workers from living in the rural area. Small scale clusters of housing were discussed, with one participant expressing that the current policy to prioritise the conversion and restoration of existing properties is expensive and could be counterproductive. The importance of job creation in the rural area was discussed, with suggestions including relocating industrial units to out of town steadings, reusing buildings for B&Bs and small local countryside businesses, and accommodating creative industries in agricultural settlements.

Transport, Education and Infrastructure

- All participants discussed the impacts on transport, health, education and drainage systems. The housing mix preferred by developers in North Berwick (large two-car executive homes) was felt to lead to excessive car use. Several participants also questioned what work would be carried out to manage transport in the town centre. Clarification was sought on who was responsible for drainage and water supply requirements resulting from new development – this was confirmed as Scottish Water’s responsibility and that solutions would be progressed as required. The impacts on education were discussed in all three groups. All groups questioned school roll projections to ensure school capacity is correctly provided. The importance of developer contributions for education provision was also highlighted. Two participants highlighted the importance of ensuring health services could cope with additional development – officials clarified that health provision is the responsibility of NHS and that these requirements would be worked through with the Proposed Plan.

Workshop Feedback Themes

- 2.18** There are a number of overarching themes evident from the responses given at the events. These are summarised as:

- Support was expressed for both the **compact and the dispersed strategy** with groups discussing the merits and drawbacks of each;
- In general terms all groups recognised the need for development and accepted the number of new **houses** put forward;
- Ensuring that housing development brought benefits to the **economy** through job creation and sustainable employment was a high priority. The rural area's contribution to the economy was also highlighted ;
- **Coalescence** was raised frequently as a concern - keeping space around settlements was seen as important to preserve the individual identities of towns and villages, and to protect agricultural land and green space;
- Concerns were raised about the impacts on the **transport network** both from the perspective of development overall and at individual site areas;
- The implications on **education provision** were discussed in most groups – accurate projections were highlighted as essential to make decisions in this area. Concerns were also raised in several groups about the ability of schools to expand within its existing site or a suitable location;
- The proposed development at **Blindwells** received support with some participants feeling this should also encompass retail/employment opportunities;
- There was confusion expressed regarding Scottish Enterprise's PAN for **Cockenzie** and lack of clarity on that site. A number of concerns were raised regarding Scottish Enterprise's proposals and the impact these could have on the area, as well as the economic feasibility for such development on the site;
- The council's preferred approach for **open cast coal mining** was generally supported; there was no support for **fracking** in areas for search identified in the British Geological Survey's map or any other areas within East Lothian;
- There was support for building on **brownfield** sites instead of greenfield areas as a way to preserve green space and also for the reuse of industrial land;
- There was support for a new **Countryside Around Towns designation** – to prevent coalescence and preserve green space;
- **Green networks** to promote cycling and walking were viewed as desirable. It was felt that more should be done to join-up and promote existing networks;
- All groups recognised the **county's assets** – tourism, heritage, nature – and a desire to preserve these within in future development.

Event Format Feedback

- 2.19 People attending the workshops were asked to complete a feedback form at the close of the event. The form was intended to give the council an insight on the style, format and content of the event, as well as the perceived value to the attendee.
- 2.20 Information provided in the forms was transferred to the online programme, surveymonkey, to enable qualitative analysis of the responses.
- 2.21 Of the 116 forms received, 50% (58 respondents) said the event had increased their knowledge of the MIR 'well', with 31.9% responding 'very well'. 18.1% of respondees

felt it was satisfactory, with no attendees rating the event poorly or very poorly for increasing knowledge.

- 2.22 57% of attendees rated the events 'good' for its ability to participate and engage, while 61% felt the topics' relevance was 'good'. This compares to 32% and 29% who felt it was 'excellent' and 9% 'satisfactory' in both categories.
- 2.23 63% of respondents said they were 'very likely' to attend future planning events.
- 2.24 Twice as many men as women attended the workshops (66% compared to 33%), with the majority in the 60+ age group followed by 45-54 (24%), and 35-44 and 55-60 (15% each).
- 2.25 Attendees highlighted the table discussions as the feature they found most useful. Being able to speak directly to planners was also highly regarded, alongside cross-council department representation to inform discussions. Participants highlighted the opportunity to focus on topics (particularly Cockerzie Power Station, infrastructure and housing) as useful. The opening presentation and scene-setting was thought to be useful by some respondents to explain the Main Issues Report concept and its complexities. A selection of the comments included "I was able to put my views forward and get the relevant answers", "hearing from ELC on the different areas", "good debates and comments being taken", "all pretty interesting and informative". Some participants specifically highlighted: "Looking at the maps and diagrams", "The data-focused approach on the spatial strategy table [at North Berwick'.
- 2.26 The largest area for improvement was the amount of time allocated to each of the table discussions. A number of respondents also highlighted problems with hearing either the video, officials and others speaking, or group discussions. Better advertising was suggested as a way to increase attendance in future, and improved facilitation to increase understanding and engagement on the evening.
- 2.27 Participants gave useful feedback on the events and suggestions to encourage future engagement. Some related to the venue and event format – microphones to improve audibility, temperature of rooms, access and signposting to venues, name badges for council staff. Others related to the timings of events: consider holding events at weekends, earlier or later start times and holding more events. A number of participants suggested that table discussions should be longer, and that people should not be limited to three workshops. While some participants felt that group numbers should be made smaller, others felt it should be made larger. However attendees felt that it was important that group numbers should be evenly distributed to enable useful discussion.

3 Part B: Key Messages from Formal Consultation

- 3.1 The MIR asked 25 questions posed around the 'main issues' (strategy and policy options as well as site options) set out in the MIR. It also invited responses in relation to the areas of minor policy review discussed in the Monitoring Statement (Question 26) and offered the opportunity to make other comments if respondents felt that the set questions did not allow them to communicate their views or if they wished to make comment in respect of the other published documents (Question 27).
- 3.2 The following section summarises the Key Messages provided through the formal MIR consultation by question and more detailed summaries are set out at Appendix 1. The specific comments provided on the IER are set out at Appendix 2.

Question 1: Vision, Aims and Objectives

- 3.3 Key messages from the responses to question one were:
- Overall support for the vision, aims and objectives from all groups;
 - Concern that there are conflicting priorities between protection of the environment and the impacts of predicted growth on it;
 - Concern that East Lothian is seen as an extension of Edinburgh;
 - Concern about scale of growth and its impact on infrastructure;
 - Scale of growth will result in loss of significant areas of prime agricultural land;
 - Scale of growth will impact on character of settlements;
 - Need to ensure support for town centres;
 - Developers stress that new housing needs to be in marketable locations if the plan is to deliver sufficient housing;
 - Tangible targets should be set against which to measure effectiveness of aims and objectives (jobs/homes etc).

Question 2: Sustainability and Climate Change

- 3.4 Key messages from the responses to question two were:
- The Scottish Government suggest that the LDP should give due weight to net economic and social benefit and supporting delivery of accessible housing, business, retailing and leisure development. The Scottish Environment Protection Agency considers that the MIR addresses the balance that needs to be made between air quality and deterioration of air quality arising from road traffic emissions and CO₂. Scottish Water is supportive of locating development where there is available capacity and will make capacity available if required. Midlothian Council suggest that the plan should support use of waste heat, including from facilities in MLC area (e.g. Millerhill);
 - Network Rail suggests that the plan needs to acknowledge that, in some circumstances, it may be necessary to protect existing development and

infrastructure from the effects of climate change, including flood risk. ELC Countryside highlights the need to protect and where possible enhance the coast from the effects of climate change;

- Developers / Agents and Landowners suggest that the LDP should take ‘the presumption in favour of development that contributes to sustainable development’ (SPP 2014) into account by indicating that it will be a significant material consideration in certain circumstances. They are also of the view that the LDP should explain how it will take into account the need to balance the costs and benefits of a proposal over the longer-term and provide further information on how ELC intends to apply ‘the presumption’ so developers know what is expected of them. Some developers suggested that the LDP should support sustainable electricity generation and make provision for its transmission and distribution in line with associated National Development status in NPF3;
- Many Community Councils offer general support, but suggest the concept of sustainable development can be used to argue just about anything, so the LDP needs to be realistic in its application of the principles set out in respect of building design, transportation and emissions;
- Members of the public who responded generally consider that:
 - The MIR lacks vision;
 - Continual growth is not sustainable;
 - Sustainability is also about the husbanding of assets for the longer term;
 - Compact growth is more sustainable than dispersed option, but although it would minimise carbon emissions from road traffic it could worsen air quality locally such as at Musselburgh High Street;
 - More should be done to improve the sustainability of locations away from the A1/ECML corridor;
 - Additional rail halts should be provided and cheap public transport between settlements regardless of whichever option is implemented;
 - Mixed use development with a variety of house types and styles and improved energy efficiency, including ‘passive’ design, and adequate provision of infrastructure and community facilities, including open space, will be important to securing sustainable development;
 - There should be a presumption against provision of gas supply to new development, with CHP or other renewable systems built into the fabric of development;
 - Need to encourage renewable energy technologies but these should be carefully sited to prevent negative impacts on the countryside and properties;
 - Concerns over ‘Fracking’ and Unconventional Gas Extraction;
 - LDP should take forward measures to mitigate flood risk, including for Musselburgh;
 - Electric vehicle charging points should be included as a requirement of the LDP to accompany new development.

Question 3: Spatial Strategy

3.5 Key messages from the responses to question three were:

- Key agencies generally support the preferred compact growth strategy, though SNH highlight its effect on landscape, subject to a number of caveats such as identifying solutions to transport capacity, air quality, and provision of good quality open space and green networks.
- Network Rail supports the compact growth strategy.
- More landowners, developers and agents prefer the compact growth strategy than the alternative dispersed growth strategy but a significant number believe that a combination of both will be required to deliver the housing targets including generosity allowances.
- Of the Community Councils who responded Musselburgh, Prestonpans and Cockenzie supported the dispersed growth strategy and Ormiston, Pencaitland, Humbie/Saltoun/Bolton, Gullane, Dunder, North Berwick, and Dunbar supported the compact growth strategy.
- Dunbar/East Linton, North Berwick and Haddington/Lammermuir Area Partnerships support compact growth and Fa'side was undecided. Musselburgh and Preston Seton Gosford supported dispersed growth.
- Most, but not all, local interest groups in the east supported the preferred compact growth strategy and most, but not all, in the west supported the dispersed growth strategy.
- Of the individual responses by members of the public many more supported the compact growth option citing the proximity of the west to where demand arose for both housing and employment and infrastructure was generally available/could be made available. However there was general concern that settlements in the west should not lose their identity or coalesce and concerns over transport capacity and environmental issues. Development further east was generally seen as potentially harmful to the high quality environment of East Lothian and the character of smaller settlements including their landscape setting. Of those who supported dispersed growth it was seen as a fairer option amid concern that compact growth could lead to disparity. There was strong support for Blindwells as a location for growth.
- Of the submitted pro-forma letters and petitions, 53 people signed a petition organised by Ravensheugh Tenants and Residents Association supports a dispersed growth strategy. 102 other pro forma letters expressed concerns about a compact growth strategy and a letter from 52 Aberlady residents supports the compact growth strategy for transport, economic development, environmental and demand reasons.

Question 4: Town Centres

3.6 Key messages from the responses to question four were:

- Of the key agencies Scottish Government requires the Proposed Plan to promote the town centre first principle and suggests that a town centre health checks and strategies be prepared. Supports a new town centre at Blindwells. SNH emphasises connectivity to and from Blindwells and the importance of green infrastructure East Lothian elements in existing town centres as does East Lothian Council Landscape and Countryside.
- Landowners, developers and agents mostly support a new town centre at Blindwells though Haddington is also suggested for retail investment and it is suggested that more land for retail outside Haddington town centre should be planned for. ASDA at Dunbar seeks protected status within retail policy.
- Prestonpans, Cockenzie/Port Seton, Gullane, Dunpender, North Berwick, Humbie/Bolton/Saltoun and Ormiston Community Councils all support a new town centre at Blindwells to serve the new town. Of these North Berwick and Gullane think it should expand in time to serve a wider area. Views of other local interest groups vary, though most support Blindwells meeting its own town centre needs. Some think that Blindwells is too close to shopping centres on the edge of Edinburgh to prove viable. HADAS suggests an alternative sub regional centre at Dunbar.
- Most members of the public support a new town centre at Blindwells and the maintenance of the current network of town centres, but more members of the public think Blindwells should also cater for a wider area.
- Each existing town centre received strong support with a wide range of comments on what should be done to improve them. Common issues were traffic and parking, improving buildings and spaces, and lack of facilities.

Question 5: Planning for Employment

3.7 Key messages from the responses to question five were:

- Of the key agencies, Scottish Government has indicated that the preferred approach seems consistent with Scottish Planning Policy which indicates that plans should reallocate business sites which are underused or not taken up to enable a wider range of viable business or alternative proposals. SEPA has indicated that the review of employment land supply and consideration of its options should continue to be made through strategic environmental assessment and locations selected that co-exist satisfactorily with other existing or proposed uses in the area.
- East Lothian Council Landscape and Countryside support the preferred approach.
- Landowners, developers and agents mostly support the preferred approach to propose mixed use strategic and local employment sites where appropriate, maintain the quantity of the current employment land supply and review the

contribution that existing proposals make to this supply. Of those who supported neither approach the main reason is that non strategic employment sites are not required due to lack of demand and that those sites where there is no prospect of delivery should be deleted from the supply;

- The Community Councils had a mixed view with Prestonpans, Humble/Saltoun/Bolton and North Berwick supporting the preferred approach; Gullane and Cockenzie the reasonable alternative and East Lammermuir, Dunbar, Dunpender and Garvald/Morham supporting neither approach. Alternatives suggested included more emphasis on infrastructure such as broadband to encourage more employment particularly in rural areas. Community Councils generally favour local employment including for smaller settlements rather than concentrating solely on strategic employment sites. Some indicated that there was local demand particularly for small business units but that allocated land that was unserviced could not meet this; different models of delivery might help. Other local interest groups suggested that mixed use might have a place on some sites; employment sites needed better promotion and that in future there will be an increasing need for flexible affordable work space; developers should be encouraged to provide small serviced employment land as part of housing developments;
- Of the members of the public, most support the preferred approach which was commonly recognised as a practical approach. There was considerable opposition to the preferred allocation of an additional large site new site between Cockenzie and Prestonpans for employment. Some were concerned that employment sites should not be allowed to change to housing and that retail use should not be permitted.

Question 6: Planning for Housing

3.8 Key messages from the responses to question six were:

- A majority of respondents overall support the preferred approach of planning for a longer-term housing strategy, not limiting the scale of land release to that needed only to meet SESplan requirements up to 2024;
- Those in support include Scottish Environment Protection Agency, Midlothian Council, Homes for Scotland and the RSPB, and a clear majority of landowners/developers, and around half of the members of the public who expressed a view:
 - Reasons for supporting the preferred approach included the ability to have:
 - a vision for the future;
 - longer term plans for infrastructure provision and avoiding decisions that would inhibit future growth;
 - provision of a generous land supply;
 - ability to intensify existing allocations;
 - more certainty around investment decisions;
 - development better integrated with opportunities for habitat creation;

- a long term strategy that reflects the current HNDA estimates of need and demand in the SESplan region beyond 2024;
 - In the context of the compact strategy (Table 5 of the MIR), some respondents suggest that it is logical to follow the sequence of considerations set out in the MIR for the preferred approach when planning for housing (intensify existing allocations, identify new land prioritising the SDA and then consider locations outwith it to maintain a five year effective land supply, identify a Blindwells Development Area and/or safeguard an area for it / expansion of it, and safeguard land for future consideration – See Table 8);
 - Homes for Scotland and some landowners/developers suggest that not all existing allocations should be retained and that the potential de-allocation of sites should be considered alongside new sites, ensuring all are marketable, deliverable and effective;
 - Some respondents have suggested that Blindwells will have an important role in contributing to Housing Land Requirements up to and beyond 2024;
 - Some respondents suggest that a wider range of housing tenure and delivery options are needed, including specialist provision and self build;
- A minority of respondents preferred the reasonable alternative of planning only for currently known housing land requirements. Those in favour of the reasonable alternative were mainly members of the public, and a small number of landowners/developers:
 - Reasons for supporting the reasonable alternative approach included:
 - Only the SDP level of growth should be planned for and not exceeded as current housing land requirements may change in future;
 - An over allocation of land may lead to less attractive sites being developed before strategically important ones, and these should not be undermined;
 - Potential for a misalignment of development with funding and infrastructure;
 - Growth should be minimised as should the impact on existing communities, including in the west of the county;
 - Every application should be assessed on its merits;
 - Blindwells should be the longer term option;
 - Some submissions suggest that SDP Policy 1A/1B and Policies 5 – 7 allow consideration of a wider area than would be the case under the ‘compact’ approach;
 - Some respondents suggest that it is illogical to follow the sequence of considerations set out in the MIR for the preferred approach when planning for housing¹ because they feel this contradicts Table 5 of the MIR;

¹ The MIR sets out a sequence of considerations as follows: 1. intensify existing allocations, 2. identify new land prioritising the SDA 3. consider locations outwith it to maintain a five year effective land supply, 4. identify a Blindwells Development Area and/or safeguard an area for it/expansion of it, and 5. safeguard land for future consideration – See Table 8 for further detail.

- Some respondents have suggested that Blindwells can not be depended on as contributing to housing land requirements up to or beyond 2024;
- Some submissions suggest that promoting a longer term strategy in the emerging LDP would encourage more development in East Lothian when it may be better delivered elsewhere in the SESplan area;
- The Scottish Government made no comment on the options in respect of the potential approaches set out when planning for housing, but it did request that the LDP, or Monitoring Statement, set out any HNDA findings with regard to specialist housing provision that people should be referred to, including Gypsies/Travellers and travelling showpeople (although the intention of introducing a criteria based policy for this was noted), houses in multiple occupation, and homes for service personnel or for people seeking self build plots;
- Some respondents suggested that a further 10 – 20% generosity factor should be added to the Housing Land Requirements set by the SDP and its associated Supplementary Guidance on Housing Land (see also Question 18);
- Some respondents suggested that the LDP will need to cover the period to 2026/27;
- Some respondents felt that there was a need for more smaller sites which are deliverable in the short term to be brought forward, particularly up to 2019;
- Some respondents felt the Council should support planning applications for housing that meet the criteria detailed in its Interim Planning Guidance to further help resolve short term supply issues before the LDP is adopted;
- Some respondents suggest a range and choice of site sizes and locations in and outwith the SDA, including in the countryside, will be needed to maintain an adequate five year effective land supply;
- There is concern that the rate of development may undermine community vibrancy and was unrealistic generally;
- Some respondents highlighted that sustainable urban design, layout and construction with a mix of uses, house types and tenures as well as delivery approaches (including self build) will be essential to secure high quality outcomes.

Question 7: Green Belt

3.9 Key messages from the responses to question seven were:

- Overall more respondents support the preferred approach to the Green belt than the reasonable alternative. This included qualified support from the key agencies who responded with Scottish Natural Heritage noting that protection of natural assets is required including longer term landscape safeguards and strategic green network connections including within some areas proposed for development such as Goshen Farm.

- Humbie/Saltoun/Bolton, and North Berwick Community Councils support the preferred approach with Prestonpans, Cockenzie and Dunpender supporting the reasonable alternative approach.
- Most landowners, developers and agents support the preferred approach to the greenbelt.
- Members of the public and local interest groups were equally split on whether to support the preferred or reasonable alternative approaches to the green belt. Some loss of land in the green belt was seen as inevitable particularly in the area closest to Edinburgh but there was an expressed concern over the potential coalescence, including the west becoming a suburb of Edinburgh, and loss of identity of settlements. Some saw loss of green belt land as preferable to loss of land in more remote rural areas, others saw green belt land as all the more necessary to protect because of its potential scarcity in the face of large scale development.

Question 8: Countryside Around Towns

3.10 Key messages from the responses to question eight were:

- Key agencies: Scottish Government and Historic Scotland recognise the role of a Countryside Around Towns policy that should work with Special Landscapes Area Designations, but also needs some further justification.
- National Interest Groups: The National Trust for Scotland and Scottish Wildlife Trust support a Countryside Around Towns policy and Homes for Scotland sees it as unnecessary. The Architectural Heritage Society for Scotland points out that landscape settings of settlements are central to the character of East Lothian.
- All the Community Councils and Area Partnerships who responded support a Countryside Around Towns policy to protect the character and identity of towns and villages and prevent coalescence. Of the other local interest groups, HADAS suggests that landscape is crucial to the setting of the area and is the key to protecting the character of East Lothian.
- The overwhelming majority of local residents and members of the public support a Countryside Around Towns policy which they see as protecting the countryside settings, character and identity of towns and villages and providing green space opportunities.
- The majority of developers, landowners and agents who expressed a view are opposed to the introduction of a Countryside Around Towns policy which is seen as unnecessary, does not plan for the longer term, is insufficiently justified, and seen as a barrier to maintaining an effective 5 year housing land supply.
- Members of the public expressed views in relation to particular locations and these are identified in the tables in the relevant summary at Appendix 1 below.

Question 9: Central Scotland Green Network

3.11 Key messages from the responses to question nine were:

- General acknowledgement that it is a national policy and so needs to be followed;
- There is general support for the Green Network concept, with some members of the public and community groups expressing enthusiasm for it;
- Support for a long terms vision for the Green Network in the area to improve amenity for residents and visitors, and that without this there is a danger of a piecemeal approach;
- The Green Network should protect key assets and seek new opportunities and there is a need to balance protection of biodiversity with access and recreation;
- The capacity of the Green Network to deliver multiple benefits is important - different priorities were mentioned including active travel, recreational space, biodiversity and landscape improvement;
- CSGN can integrate with other plans, policies and strategies, including providing multi-functional benefits, such as:
 - Biodiversity Action Plan
 - River Basin Management Planning / water framework directive / flooding / surface water management
 - other policies of the LDP - GB / CAT etc
 - support for tourism, recreation and open space objectives
 - transport initiatives, including active travel for leisure and commuting
 - By virtue of the above contribute to reducing traffic congestion and pollution
- There is a need to consider the East Lothian-wide strategy, but detailed policy should be set out in Supplementary Guidance. This would specify the actions that are intended on the ground, and provide clarity to the public, investors and developers alike, including funding options;
- Developer contributions should be sought for delivery provision as planning obligations although some developers stressed that beneficial development should not be unnecessarily restricted;
- It is recognised that the role of strategic/larger sites in helping to facilitate CSGN objectives could be significant;
- The LDP Action Programme should play a key role in setting out where CSGN objectives should be delivered and by whom;
- A design led approach should be followed, where CSGN objectives are considered as part of plan making, master planning and applications etc;
- Midlothian Council wants to work together jointly on considering opportunities to secure cross-boundary strategy and benefits;
- Some concern this will result in some dis-benefit to the rural economy and farmers particularly (see also comments on CAT above);

- The role of the coast, and the demand for access to it, needs to feature as a key consideration for the CSGN in East Lothian going forward;
- Some expressed the view that it should be used as a policy tool to protect the landscape from further harmful human intervention;
- It was noted that a significant amount of work, leadership and investment will be needed to deliver it, but that the benefits will outweigh the costs;
- Short timescale targeted actions should be identified with a commitment to implementation;
- A number of specific projects were suggested, and these are identified in the tables in the relevant summary at Appendix 1 below.

Question 10: Development in the Countryside and on the Coast

3.12 Key messages from the responses to question ten were:

- Of the key agencies, Scottish Government seek further clarification as to whether all of East Lothian's countryside should be categorised in the same way which might result in different policies for different parts of East Lothian's countryside and want agricultural land protected. SNH emphasise the importance of development fitting with local development patterns and landscape character, the identification of the unspoiled coast and coastal erosion and flood risk to be considered. SEPA supports the preferred approach but with the identification of significantly constrained coastal areas, unspoiled coast and that at risk from flooding. Scottish Enterprise and Network Rail note that the need to protect natural resources of coast and countryside must be balanced with role of the coast and countryside in delivering essential infrastructure.
- East Lothian Council Landscape and Countryside supports the preferred approach but wants stronger protection for the coast which is the busiest in Scotland.
- Prestonpans, Cockenzie, Dunpender and Gullane Community Councils support the present policy to restrict development in the countryside with North Berwick, Pencaitland and Humbie/Saltoun/Bolton supporting the reasonable alternative to permit like for like replacement and very small scale solely affordable housing in the countryside. East Lammermuir would support other very small scale housing in the countryside and Garvald and Morham support the reuse of buildings before any new build is considered. Local interest groups in the coastal villages wish to see development restricted in this area. Some local interest groups wish to see policy support for community led initiatives including eco-villages. Others consider that the coast offers recreation potential that should not be prevented by policy; that broadband infrastructure should be permitted and HADAS recommend different policy approaches in different parts of the countryside. Area Partnerships did not specifically respond to this question.
- The vast majority of members of the public support the present policy with a number willing to amend it to permit replacement buildings and very small scale

affordable housing. Several mentioned the importance of the countryside to tourism and only a very few support opening up the countryside to private housing development.

- The vast majority of landowners, developers and agents want to see the countryside opened up to more development the most commonly mentioned being housing development. Many see East Lothian's current policy as overly restrictive and inconsistent and the National Planning Framework especially in regard to offshore infrastructure development and with Scottish Planning Policy.
- The National Trust, Wildlife Trust and RSPB support the present policy. Sport Scotland want it to recognise country parks and the Architectural Heritage Society want to separate coast policy from countryside policy. Homes for Scotland supported the reasonable alternatives though consider there may be scope to allow further developments.

Question 11: Musselburgh Cluster

3.13 Key messages from the responses to question eleven were:

- Historic Scotland advises that the site at Goshen (PREF-M9) has potential to raise issues of national significance in terms of the battlefield but these impacts could be mitigated through design. It would not support development of OTH-M14 Howe Mire due to impacts on battlefield.
- Transport Scotland advises that there is currently no commitment by them to either fund or deliver the 'parkway' station in Musselburgh which is identified as safeguarded in the current local plan.
- Scottish Natural Heritage has concerns over PREF-M11 at Dolphingstone due to landscape and visual impact and believes ALT-M5 at Whitecraig North and OTH-M14 at Howe Mire would be preferable from a landscape and visual point of view.
- Midlothian Council believes there is merit in the 'compact' approach but has some concerns over education and transportation constraints and seeks continued joint working to address these. Would allow East Lothian Council to utilise education capacity within Midlothian but would not consider utilising education capacity within ELC.
- Network Rail supports the preferred approach. Sites PREF-M1 (Craighall), PREF-M9 (Goshen) and others are likely to have impacts on Musselburgh and Wallyford stations.
- Homes for Scotland believes there is a shortfall in the proposed supply of housing throughout all the clusters that has implications for the Proposed Plan.
- Community Councils, local interest groups and members of the public express concerns over impacts on traffic, air quality, green belt, agricultural land, infrastructure and services but also there were positive views in relation to housing market demand, links to Edinburgh and potential regeneration benefits;
- In general terms, many respondents felt development on the east of the cluster in particular would impact on traffic and air quality in the town centre and therefore the west of Musselburgh was preferable;

- Common concerns in all areas were loss of green belt, agricultural land, transport impacts, infrastructure and services;
- Other respondents noted that Musselburgh was in demand, had the best transport links to Edinburgh, and there were potential regeneration benefits;
- Site PREF-M9 at Goshen attracted the most significant volume of comment, a clear majority of these objecting – key issues included infrastructure (education/transport), traffic congestion and air quality, loss of green belt, settlement coalescence;
- In relation to education, there was a range of views on the best approach but a common theme was opposition to having two secondary schools in the cluster. The main reasons related to impacts on community integration;
- Sites at Goshen, Craighall and Wallyford all presented themselves as locations within which new primary schools and / or secondary schools could be located;
- A series of views was expressed in relation to particular sites and these are identified in the table at the foot of the relevant summary at Appendix 1.

Question 12: Prestonpans / Port Seton / Cockenzie / Longniddry Cluster

3.14 Key messages from the responses to question twelve were:

- Historic Scotland advised that impact on the Scheduled Monument at Cockenzie needs to be considered but can be mitigated;
- SEPA advised that a Flood Risk Assessment is required for Cockenzie Power Station site (PREF-P1) and Longniddry South (ALT-P2);
- SNH made comments on landscape and visual impacts of development of site PREF-P1 Cockenzie Power Station but that advise that impacts can be mitigated;
- Midlothian Council advise that utilising a rail access could reduce cumulative impacts of developments on road network;
- Significant level of opposition to Cockenzie Power Station site (PREF-P1) due to wide range of issues including loss of open space, impact on battlefield, overall scale and impact on communities;
- Some respondents do not oppose development on the footprint of the power station and coal store, and therefore some of the opposition appears to be based on assumptions around the scale and nature of any proposals;
- There is concern at the interpretation of National Planning Framework 3 – national development status may not extend beyond thermal generation;
- A smaller number of respondents expressed support for PREF-P1 on the basis that it contains brownfield land and re-development is logical and/or could bring benefits;
- There were similar numbers of responses supporting and objecting to Longniddry South (ALT-P2) though a majority objected:
 - The main reasons for objecting were lack of integration, overall scale, transport capacity, coalescence, and agricultural land;
 - Those in support cited the need for affordable housing, transport infrastructure, and opportunities for benefits to the village.

- A series of views were expressed in relation to particular sites and these are identified in the table at the foot of the relevant summary at Appendix 1.

Question 13: Tranent Cluster

3.15 Key messages from the responses to question thirteen were:

- Historic Scotland advises that PREF-T1 Bankpark Grove will need to be designed to safeguard the setting of the Prestonpans inventory battlefield site and Tranent Conservation Area;
- Sportscotland raised concerns regarding loss of sports pitches through school expansion;
- Scottish Natural Heritage – has concerns over PREF-T10 Elphinstone West due to landscape and visual impact and makes general comments on other sites. However concerns can be addressed through the use of site briefs or strategic design frameworks;
- Transport Scotland: concerned about the road network capacity, particularly in the west of East Lothian. However they are working with ELC to identify solutions and funding methods to address these concerns;
- Concern from developers that neither approach will deliver sufficient housing completions to meet SESplan requirements;
- Support from landowners/developers for their particular sites and opposition to other sites;
- Midlothian Council advises that the trunk and local road network capacity a concern, particularly in the west of East Lothian. However they are working with ELC to identify solutions and funding methods to address these concerns. It suggests the use of sites with rail or potential rail access may be beneficial in reducing cumulative impacts;
- Concern from local community about :
 - Loss of identity of towns/villages;
 - Impact on road network;
 - Insufficient education capacity;
 - Building on prime agricultural land;
 - Poor public transport links;
- A series of views were expressed in relation to particular sites and these are identified in the table at the foot of the relevant summary at Appendix 1.

Question 14: Haddington Cluster

3.16 Key messages from the responses to question fourteen were:

- Historic Scotland stressed the need to safeguard historical assets around OTH-H7 Dovecot;

- Sportscotland raised concerns regarding loss of sports pitches through school expansion;
- Transport Scotland: is concerned about the road network capacity, particularly in the west of East Lothian. However they are working with ELC to identify solutions and funding methods to address these concerns;
- Scottish Natural Heritage raises concerns about the development of PREF-5 Harperdean particularly with regards to visual impacts on the landscape . However these could be mitigated through a design framework;
- Midlothian Council advises that the trunk and local road network capacity a concern, particularly in the west of East Lothian. However it is working with ELC to identify solutions and funding methods to address these concerns;
- Developers are concerned that there would be difficulties with either approach to meet SESplan housing requirement;
- Support for Preferred Approach from both developers and public;
- Opposition from public of Reasonable Alternative Approach;
- Demand for housing closer to Edinburgh;
- Concern about ability of schools and infrastructure to cope with growth;
- Concern about scale of growth on character of Haddington;
- Opposition to development at Amisfield and Dovecot;
- Need improvements in public transport links;
- New primary school should serve Letham and wider area;
- A series of views were expressed in relation to particular sites and these are identified in the table at the foot of the relevant summary at Appendix 1.

Question 15: Dunbar Cluster

3.17 Key messages from the responses to question fifteen were:

- Historic Scotland stressed the need to safeguard historical assets;
- Sportscotland raised concerns regarding loss of sports pitches through school expansion;
- Transport Scotland is concerned about the road network capacity, particularly in the west of East Lothian. However it is working with ELC to identify solutions and funding methods to address these concerns;
- Midlothian Council advises that the trunk and local road network capacity a concern, particularly in the west of East Lothian. However it is working with ELC to identify solutions and funding methods to address these concerns;
- Developers are concerned that neither approach will meet SESplan housing requirement;
- National Trust for Scotland believes it would be inappropriate to develop land to the north and east of Preston within the area of search for East Linton;
- Viridor supports the intention to co-locate heat producers and users wherever practicable;
- ASDA would like to see recognition of site at Spott Road as either a Commercial Centre or District Centre to safeguard their position in retail hierarchy;
- Preference for preferred approach from the public;

- West Barns and Dunbar in danger of merging with consequential loss of identity of West Barns and Belhaven;
- Strong support for a link under/over the East Coast Rail line from Development at Eweford / Hallhill to Dunbar;
- Need to improve public transport links from and to Dunbar to reduce reliance on private travel;
- Support for rail halt at East Linton but recognition that this will attract further housing;
- Need to safeguard employment land at Spott Road and Auction Mart Site;
- Need strong design policies to ensure building for place;
- Impact on education provision;
- Impact on infrastructure;
- Loss of prime agricultural land;
- A series of views were expressed in relation to particular sites and these are identified in the table at the foot of the relevant summary at Appendix 1.

Question 16: North Berwick Cluster

3.18 Key messages from the responses to question sixteen were:

- Historic Scotland has concerns about the impact of proposal PREF-N5 Castlemains on the character of the conservation area in Dirleton and strong concerns about the impact of it on the setting of the Scheduled Monument of Dirleton Castle;
- Historic Scotland has concerns about impact of proposals at Aberlady on its conservation area ;
- Historic Scotland has concerns about Drem being completely surrounded by development which would impact on its conservation area and fundamentally alter its character
- Transport Scotland is concerned about the road network capacity, particularly in the west of East Lothian. However it is working with ELC to identify solutions and funding methods to address these concerns;
- Scottish Natural Heritage has concerns over PREF-N2 Tantallon Road due to landscape and visual impact on North Berwick Law. It believes sites at ALT-N3 Foreshot Terrace Dirleton, ALT-N6 Fentoun Gait East, ALT-N7 Fentoun Gait South Gullane, and OTH-N11 Drem Expansion Area of Search would be preferable;
- Midlothian Council considers development in all clusters will have 'downstream' implications for Midlothian in terms of road traffic;
- Scottish Water advises that there is a capacity issue within the North Berwick cluster that may affect development in the short term. However a growth project has been initiated and any allocation of housing sites within the cluster through the LDP will be included in the growth project. It should not be a reason for the non allocation of sites;
- Developers/landowners promoting sites to ensure sufficient completions within the required timescales to meet SESplan targets;

- Support from public for development to be concentrated in west;
- Concern from public that villages will lose their character if Reasonable Alternative option followed;
- Opposition to development of ALT-N1 at Ferrygate;
- Strong opposition to development of PREF-N8 Saltcoats at Gullane;
- Strong opposition to development of ALT-N10 Aberlady East;
- Some opposition to PREF-N9 Aberlady West but also some support for that site;
- Support from for development of the PREF-N5 Fire Service College Gullane for mixed-use- private and affordable housing as well as employment land;
- Some public preference for Reasonable Alternative ALT-N3 Foreshot Terrace instead of preferred site PREF-N4 Castlemains in Dirleton but overall similar levels of support and objection to both sites;
- Concern from public regarding the impact of development across the cluster on road network, education capacity and infrastructure;
- Concern development would impact on tourism;
- Concern regarding development resulting in loss of prime agricultural land;
- Mixed opinions from public on development at Drem – scale of proposals would impact on local community and local infrastructure but would help direct development away from other settlements;
- A series of views were expressed in relation to particular sites and these are identified in the table at the foot of the relevant summary at Appendix 1.

Question 17: Blindwells

3.19 Key messages from the responses to question seventeen were:

- Historic Scotland considers that whilst the allocated area and area of search is unlikely to raise any significant concerns, there is the potential that development near the north western boundary may adversely affect the setting of Seaton Castle (formally Seton House) and its associated buildings and designed landscape;
- Transport Scotland consider that the access solution should not focus on rail from the outset, and if a new A1(T) Interchange is to be promoted then it will need to be assessed against Strategic Transport Appraisal Guidance and Design Manual for Roads and Bridges – i.e. justified and technically deliverable;
- Sportscotland recognises the potential to design from the outset high quality leisure and recreation facilities including consideration of how these might be integrated with other community facilities;
- Scottish Water is supportive of the preferred approach since it makes good use of existing assets, but if alternative approaches need be followed then it would be supportive of those too;
- Homes for Scotland considers that Blindwells is constrained, and that the existing and expansion areas cannot contribute to the effective land supply for the LDP period, unless comprehensive solutions are found for addressing infrastructure solutions prior to the Proposed LDP;

- Coal Authority is supportive of site redevelopment and recognises scope for environmental improvement;
- Network Rail has concerns over the impacts development here would have on St Germain's level crossing;
- RSPB considers that any development at Blindwells should mitigate habitat loss, including the wetland habitat at the sites north-western boundary;
- The general view of Developers / Landowners within area identified by MIR is:
 - Hargreaves and Mr B Kennedy: support the preferred approach; both willing to consider transfer of land at an early stage for provision of education facilities, but in exchange would require reduction of developer contributions for other items – an alternative is also suggested where landowners could participate in an excambion (exchange of land) to provide surety that facilities can be delivered in future; feel they can progress together with or independent of the other landowners;
 - Mr Martin Steven: offers general support for the proposal to extend Blindwells to its full extent as outlined in the MIR, subject to specific consideration of phasing and master planning and a collaborative approach to developing the site by all parties involved;
 - Taylor Wimpey and AWG: support the continued allocation of existing site and the expansion land to the east, but wish to have flexibility to progress together with or independent of the other landowners;
- Mr Roy Mitchell (for B Kennedy): considers that land south of the A1 and to the east of Tranent should also be considered as part of the Blindwells expansion area of search;
- The general view from other developers / landowners is that:
 - the site has been allocated for some time but little progress has been made;
 - the site is heavily constrained in terms of ground conditions and flood issues and is not an 'effective' site as defined by PAN 2/2010 and therefore should not be allocated or relied on (existing allocation as well as any expansion), particularly as far as maintaining a five year supply of effective housing land is concerned;
 - even with recent changes in landownership it is difficult to see how the site could be brought forward;
 - there is no need to promote the expansion of the settlement until post 2024, especially when smaller more deliverable sites could be brought forward;
 - there is concern about the use of greenfield land as well as landscape impacts;
 - there is concern over substantial upfront infrastructure costs, including for land remediation and infrastructure costs, that this site would incur when compared to smaller more deliverable sites;
 - there is concern about the Council's 'vague' approach regarding developer contributions;

- Community Councils and local interest groups who responded in general support Blindwells and the expansion of it in the longer term, consider that the site could reduce the impact of commuting, but that it could also introduce negative social aspects (not specified) and result in the loss of large amounts of prime agricultural land. They also questioned if the allocation should be as large as suggested;
- Members of the public who responded generally consider that:
 - Blindwells is an opportunity to be proactive in design and produce high quality development for future generations;
 - Blindwells should be renamed 'Charlestoun' and conservation of the Riggonhead Defile included to provide an immediate sense of history in addition to the opencast mining;
 - Development at Blindwells should be encouraged over developing in other parts of East Lothian, particularly locations outwith the SDA;
 - There is a need for additional community facilities, shops and medical services to accommodate this level of growth, and the Government should provide this;
 - There is potential to consider a large new town centre to provide a location within East Lothian for a retail park which may also serve surrounding settlements such as Longniddry provided they do not coalesce;
 - Concern that a three way phasing strategy suggested as an option by the MIR could lead to piecemeal development;
 - There is concern that the eastern greenfield part of the site will be developed before the western brownfield part;
 - In terms of education, it is preferred that the new settlement includes developer funded education facilities located centrally, in order to alleviate pressure on nearby schools, but some suggested a location to the south of Longniddry for this;
 - A definite plan for provision of education is essential, and this should not put pressure on Ross High or Preston Lodge High Schools;
 - A smaller area at Blindwells may be suitable for development or as an alternative a smaller development to the south of Longniddry rail halt; if a rail halt can not be delivered, then a park and ride facility should be provided instead, to link with existing services on the North Berwick line;
 - Proposed expansion is too large;
 - Some doubts were raised over the potential to introduce employment opportunities;
 - Development of the site will cause a large increase in congestion on local roads, deterioration in air quality, with rail services unable to support increased numbers of people travelling to Edinburgh;
 - Site is generally undeliverable/unviable due to ground conditions, with detailed plans an unrealistic aspiration within the LDP period;
 - Full position on ground conditions needs to be known before any commitment is given to the site;
 - The site should be returned to agriculture;

- The new settlement would lack its own identity, reducing the beauty and appeal of the area;
- Would lead to almost full coalescence of settlements from Edinburgh city centre to Longniddry, and impact negatively on the setting of settlements such as Longniddry;
- Development should be spread further along the A1 corridor.

Question 18: Housing Land Requirements and Supply (Table 26)

3.20 Key messages from the responses to question eighteen were:

General Points

- Some respondents supported the approach set out in Table 26, but some did not support it and others did not sufficiently understand the issue to make any meaningful comment;
- Of those who supported the approach the majority felt that it was a reasonable reflection of how the SDPs / Supplementary Guidance on Housing Land Housing Land Requirement could be met, with some acknowledging that the rate of development that would be needed was very optimistic in light of past trends;
- Those who opposed the approach can broadly be split in to two categories: 1) those who felt too much land was being made available (mostly members of the public) and 2) those who thought not enough land was being made available (mostly landowners/developers/agents):
 - Of those who felt too much land was being made available, one pointed to the 'additional allowances' set out the SDPs Supplementary Guidance on Housing Land as an indication of the amount of new land that should be allocated and where, while others felt that the scale of the Housing Land Requirement in general was unjustified in light of past and perceived future trends and / or would significantly undermine East Lothian's character / amenity / infrastructure;
 - Of those respondents who thought not enough land was being made available, Homes for Scotland acknowledged that a significant increase in annual build rate is required and that the Council cannot control what the market is able to or seeks to deliver in any given year: nonetheless, the main reasons for these respondents views relate to the policy and technical considerations set out below:

Housing Land Requirements & Supply

- Homes for Scotland and the majority of developers / landowners / agents who objected to the approach set out in Table 26 of the MIR are of the view that SDP Policy 5: Housing Land as well as its associated Supplementary Guidance on Housing Land set out Housing Supply Targets, and that they do not set Housing Land Requirements;

- The respondents wish to apply certain aspects of the new SPP (2014) – i.e. those parts of it in respect of ‘generosity’ where 10 – 20% is to be added to ‘the number of new homes to be developed within the plan period’ to seek higher Housing Land Requirements for the emerging LDP;
- The implication of the respondents approach is that new and higher Housing Land Requirements should be set out in the emerging LDP in comparison to those already confirmed by SESplan’s approved Supplementary Guidance on Housing Land for East Lothian for each of the SDP plan periods – e.g.:
 - SESplan SG HLR 6,250 homes 2009 – 2019 would = 7,500 homes (@ +20% generosity)
 - SESplan SG HLR 3,800 homes 2019 – 2024 would = 4,560 homes (@ +20% generosity)
 - SESplan SG HLR 10,050 homes to 2024 would = 12,060 homes (@ +20% generosity)

Effective Land Supply

- Many respondents are of the view that the adequacy of the five year effective housing land supply should be calculated taking into account the SDPs ‘interim’ Housing Land Requirement set up to 2019 separate from the one up to 2024;
- The respondents suggest that the addition of a further 10 – 20% generosity to the Housing Land Requirement is also needed to ensure that a minimum effective five year housing land supply can be maintained at all times;
- Achieving the rate of development needed to meet the Housing Land requirement would need annual completions rates well in excess of that achieved in the area in the past – in some years up to 2019 around treble the historic (04/05 – 12/13) average would be required;
- Some respondents felt that there is a need for more smaller sites which are deliverable in the short term to be brought forward, particularly up to 2019;
- Homes for Scotland acknowledge that a significant increase in annual build rate is required and that the Council cannot control what the market is able to or seeks to deliver in any year;
- If an effective five year housing land supply is not maintained then in line with the new SPP (2014) the LDP policies will be deemed out-of-date and the new SPPs ‘*presumption in favour of development that contributes to sustainable development*’ will apply;
- Some respondents suggest that the allocation of land should reflect need / demand by cluster, while others felt significant land allocations across the whole of East Lothian is the only way Housing Land Requirements may be met;
- The respondents also raise detailed issues, including the programming anticipated from the development of existing sites as well as new potential sites set out in the Main Issues Report;
- They suggest that additional land will be needed over and above preferred MIR sites because of delays in developing the established supply, an increased number of constrained sites (e.g. Wallyford and Blindwells) and because the start date and rate of development anticipated from Preferred MIR sites is too

optimistic particularly if planning permissions for them are not approved before the LDP is adopted;

Summary

- Overall, at this stage, the objectors suggest that the effect of adding 20% to the Housing Land Requirements combined with their view on reduced output from the established housing land supply would be a need to allocate more land in addition to the preferred MIR sites which is capable of delivering a further:
 - 2,654 homes in the period 2009 – 2019; and
 - 772 homes in the period 2019 – 2024.
- Annual completion rates well in excess of those achieved in the area in the past in some years up to 2019 around treble the historic (04/05 – 12/13) average would be required;
- Homes for Scotland acknowledge that a significant increase in annual build rate is required and that the Council cannot control what the market is able to or seeks to deliver in any year;
- To give the market the best possible opportunity to maximise the contribution it can make to meeting East Lothian’s housing requirements the respondents generally request that the Council:
 - Plan for a generosity allowance at the upper end of the 10-20% scale recommended by SPP(2014);
 - Allocate a range of sites, including in terms of size, location and type (greenfield / brownfield);
 - Be flexible in respect of any preferred spatial strategy if this will help deliver houses in the volumes needed;
 - Identify a range of sites over and above those already identified as preferred in the MIR.
- Respondents also strongly urge the Council to review its current approach in respect of Development Management decisions on windfall housing sites. If there were an active and declared strategy to help address East Lothian’s housing shortfall then there would be more justification for the Council’s optimistic early programming of delivery on new sites;
- Some respondents also wanted quality of design and materials in keeping with traditional Scottish, and specifically East Lothian, architecture and traditional development patterns.

Question 19: Developer Contributions

3.21 Key messages from the responses to question nineteen were:

- Overall, there is support for the continuation of the current approach to assessing the need for developer contributions on a case-by-case basis;

- It has been suggested, including by the Scottish Government, that the alternative ‘roof tax / standard charge ‘ approach may not be consistent with Circular 3/2012;
- A key theme is the need for early up front information and clarity to be provided through the LDP / Action Programme / Supplementary Guidance / in pre-application discussions;
- There may be some merit in identifying likely costs up front as if in a roof tax model, albeit that this be followed by a case by case assessment at the time each application is made;
- The development industry would like to understand the obligations being placed on a site before allocation to help inform considerations on the viability of sites;
- Many members of the public feel the Council should be more firm in its approach to seeking developer contributions;
- Local bodies wish to be consulted on and have a say in how and for what contributions should be gathered and spent, for example through Area Partnerships.

Question 20: Affordable Housing Quota

3.22 Key messages from the responses to question twenty were:

- Homes for Scotland supports neither approach. Whilst the 25% quota of the preferred approach would have a lighter impact on the development viability than the reasonable alternative it will put a significant strain on some sites. It is therefore vital that the rate is reviewed on a case by case basis wherever an applicant presents good evidence that the overall development would be unviable if the full quota were applied;
- Developers overwhelmingly support the Preferred Approach but also express concern that some sites may not be viable if the full 25% affordable housing quota is applied. Many wish development viability issues to be taken into account when seeking to secure affordable housing through market housing sites, including the potential for a reduction of such provision below 25% to help ensure development can proceed if justification is provided for this on a case-by-case basis. Developers feel there should be some flexibility to negotiate this with the Council in line with SPP guidance;
- Community Councils and Community Groups mostly support the Preferred Approach and recognise the financial implications this has on the development of sites. However some do support the Reasonable Alternative in a drive to increase affordable housing provision within East Lothian and feel it should be flexible to meet local demand and local circumstance. Respondents in this category want sites to be carefully considered so as to ensure a positive blend of house and tenure types in any one area. Some support for specialist affordable housing to meet the needs of an ageing population;
- Members of the public generally support the Preferred Approach, recognising the financial implications this has on developers. However there was also some support for the Reasonable Alternative. Some confusion was expressed over

what exactly affordable housing means but it is widely recognised that affordable housing is required to meet the needs of communities. There is a need for a variety of types of affordable housing and in a good variety of locations especially rural and in expensive, sought after areas. Respondents do not want to see developments made up solely of affordable housing – need to integrate with existing communities;

- Some noted that a 25% quota would not fully address needs while others noted it may secure a balance between the need for affordable housing and to ensure development viability;
- Some felt that an increase in the land supply would help address the affordable housing issue – demand has in the past outstripped supply, resulting in higher market housing costs and an affordability issue;
- Although there was some support for the higher 30% quota (particularly for land in public control subject to this representing Best Value), many felt this would make sites unviable and was not supported by SPP - notably this was the case mostly among landowners and developers;
- Some felt the 5 dwelling 'trigger' for the provision of affordable housing seemed appropriate, but some felt it is was too low particularly for smaller sites and should be increased (one suggestion was to increase it to 20 units or more);
- Some felt that market providers should provide a wider range and choice of homes for sale to better reflect need and demand and that these and traditional affordable housing tenures should be mixed together as part of wider development sites to secure a better social mix;
- Some felt the role of smaller / cheaper homes for sale should be considered as contributing towards the affordable housing quota – e.g. homes of around 90m² may be considered as affordable housing;
- Some felt that the provision of affordable housing should in general reflect the needs of the area in which it is being delivered - a housing needs survey would be a useful tool to help inform consideration of this;
- Some felt the quota and tenure mix should vary and be justified on a cluster level (see comments above on Housing Market Area and Local Authority area HNDA reporting);
- Locational issues – some felt that affordable housing:
 - provision may be concentrated in the west of East Lothian under the compact strategy;
 - has caused undesirable enclaves in Dunbar but is also needed there;
 - is needed in North Berwick and Gullane (particularly for families)
- Some felt that there is a need to provide affordable housing at the same time as market housing;
- Some felt there was a need for more affordable housing in rural areas;
- Some felt affordable housing lowered the value of private housing and should not be provided;
- Some felt that people who live in affordable housing are typically socially undesirable and the affordable housing quota should be kept as low as possible.

Question 21: Affordable Housing - Tenure Mix

3.23 Key messages from the responses to question twenty-one were:

- NHS Lothian believe the LDP should adopt the Reasonable Alternative of 30% Affordable Housing quota to help meet housing need;
- Homes for Scotland supports the Preferred Approach and the introduction of a more flexible policy stance on affordable housing tenures;
- Overwhelming support for the Preferred Approach from developers/landowners
- Support from developers for small market homes (less than 90m²) to be acceptable in terms of meeting affordable housing policy requirements;
- Support from developers for mid-market rent models for provision of affordable housing which can offer long term investment opportunities ;
- Some developers believe that the affordable housing tenure requirement for a particular development should be agreed with the Council at pre-application stage in order to fully understand the economic viability and help secure an effective site;
- Registered Social Landlords should be responsible for the mix and delivery of affordable housing;
- There was some support for Preferred Approach from Community Councils as it would allow the mix of housing to be tailored to the circumstance of each location;
- Community Councils and community groups believe that more affordable sheltered housing is required to meet the needs of an ageing population;
- Some support for Preferred Approach from public but also support for the Reasonable Alternative ;
- Concern from public that some affordable types and tenures would not be maintained as affordable in the longer term;
- Support for a wide range of housing types & tenures to give choice;
- Support for some self build housing and community trusts for delivering affordable homes;
- Need some accessible housing for less able bodied residents;
- Specialist housing for the elderly should be considered;
- Some felt the role of smaller / cheaper homes for sale should be considered as contributing towards the affordable housing quota.

Question 22: Energy Including Renewable Energy

3.24 Key messages from the responses to question twenty-two were:

NPF3 / Cockenzie / Offshore Renewables

- Scottish Government considers the preferred approach closely reflects National Planning Framework 3 in relation to supporting Cockenzie as a potential location to support off-shore renewables and/or port-related activity (and Torness in the

longer term), and supporting grid connections for off-shore renewables. It provides further information on off-shore consents - Neart Na Gaoithe, Inch Cape Offshore Ltd, Seagreen Alpha and Sea Green Bravo). It advises that sectoral marine plans are expected to be adopted by Minister's in early 2015. Scottish Enterprise is concerned at the lack of reference to East Lothian's role in energy and off-shore renewables and extant planning permission related on-shore works;

- National Trust Scotland: refers to previously expressed concerns regarding the 'Energy Park' and Battlefield. Royal Society Protection of Birds seeks clarification of status of Cockenzie Power Station gas-fired consent, and assumes 'Energy Park' supersedes this. It does not support the gas-fired station, and advises that small environmental impacts can harm integrity of the Special Protection Area. Suggests mitigation and compensation measures.
- Cockenzie and Port Seton Community Council supports a new power station/development at Cockenzie within the power station footprint but not on open spaces around the site. North Berwick CC feels the future of the site needs to be settled;
- Scottish Power Generation Ltd notes the national status of gas-fired consent for Cockenzie and requests that the route of the pipeline be safeguarded too;
- Inch Cape Offshore Ltd requests LDP supports off-shore renewables and associated infrastructure, and national development status of 'High Voltage Electricity Transmission Network' in NPF3; Scottish Enterprise, Scottish Power Energy Networks, Neart na Gaoithe Offshore Wind Ltd, Firth of Forth and Tay Offshore Wind Developers Group request that the LDP should safeguard on-shore works associated with off-shore renewables, specifically developments which have recently secure planning permission which also have national development status;
- Cardross Asset Management suggests Cockenzie is not being retained for thermal energy and this should not be reflected in policy. Consideration should be given to a port here, subject to viability analysis and that grid connections could impact on port delivery;
- Scottish Green Party/Sustaining Dunbar/Common Weal Dunbar: Cockenzie should not become gas fired due to carbon emissions, but should support offshore renewables subject to community involvement. ELC should also commission research into the decommissioning of Torness with a view to rehabilitation;
- Bourne Leisure: LDP should acknowledge that tourism is a sensitive receptor in respect of any proposal at Cockenzie;
- Association of East Lothian Day Centres: Cockenzie's conversion to a gas-fired power station not an option and MIR is incorrect on this. The Association supports grid connections for offshore renewables but feels the technology may be unreliable and unviable;
- Some support from members of the public for preferred approach in relation to supporting Cockenzie as potential location to support off-shore renewables and/or for port related activity but significant level of concern over potential impacts of development at the Cockenzie power station site, adjacent land, or any associated port activities.

- Some comments go beyond scope of Local Development Plan (e.g. opposition to gas-fired power station, which is already consented by Scottish Government).

Onshore Wind

- The Scottish Government notes that further work could be done to refine (reduce) community separation distances in the Spatial Framework. A threshold of size of development to which the framework should apply of either 12 m or 42m is acceptable, with the latter avoiding Group 2 processing requirements. Safeguards would be provided by policy criteria, which could include the use of the Landscape Capacity Study;
- Several groups support a cautious approach to wind development, including some Community Councils and the National Trust. Other groups, including the Scottish Greens and environmental groups in Dunbar, as well as a few landowners considered policy should be more supportive of wind development;
- The RSPB is supportive of renewable energy development but notes the potential for wind development to impact on birds, especially on the coastal plain;
- Sustaining A Beautiful East Lothian (SABEL) wishes to see an updated landscape capacity study taking account of cumulative impact, feeding into spatial guidance, along with clear criteria based renewable energy and wind policy;
- There was a concern that wind energy could impact negatively on tourism;
- There were mixed views among the public, with points raised against wind energy being that it is not economic and not as green as made out to be;
- There were also supporters of wind energy;

Heat Networks and Combined Heat and Power (CHP)

- There was support for the development of heat networks and CHP, including from the Scottish Government and SEPA, members of the public and several groups in Dunbar, though concerns were raised by some about its impact on viability of development;
- Midlothian Council and Viridor note the potential of the Millerhill waste plant and Oxwellmains sites respectively to supply existing and potential users of heat;
- The Scottish Government and SEPA support Energy From Waste where it complies with the Zero Waste Plan, as does Viridor;
- Dunbar Community Council state that they back this at Lafarge, but not everybody in the community supports it - Viridor's plans are widely unwelcome in the community;

Other Renewable Issues

- On micro-renewables, ground and air source heating, biomass, CHP, offshore wind were supported, with some groups calling for specific policy or guidance on small scale renewables.
- Dunpendeer Community Council would like to see renewable energy sources fitted to all new houses;

- Solar power was supported generally, though concern was raised over solar panels where they have visual impact on properties in Conservation Areas;
- Energy efficiency was seen as important;
- There was some support for community renewable generation schemes, including from the Scottish Greens and groups in Dunbar, as well as some members of the public;

Other Energy Generation

- Nuclear power was supported by one respondent and research into its decommissioning was called for by the Scottish Greens and community groups in Dunbar.

Question 23: Low and Zero Carbon Generating Technologies

3.25 Key messages from the responses to question twenty-three were:

- Scottish Government notes either approach is viable but the specified and rising proportion of emissions to be saved must be within Local Development Plan policy, not Supplementary Guidance;
- A majority of respondents are in favour of the preferred approach, generally believing this to be realistic and achievable, and that higher standards may be undeliverable/unviable;
- A significant minority of respondents support higher standards (alternative approach, or greater), generally arguing that we should aim higher and prevent future emissions;
- No suggestions were offered as to how the policy could be drafted and/or implemented.

Question 24: Minerals

3.26 Key messages from the responses to question twenty-four were:

- Scottish Government supports the Preferred Approach to onshore oil and gas;
- Coal Authority supports the Reasonable Alternative which would identify areas of search where opencast most likely to be acceptable;
- Scottish Water does not have preference to either approach;
- Midlothian Council support Preferred Approach to opencast mineral extraction if such activities resulted in unacceptable environmental impacts ;
- RSPB believes firmer stance should be taken on environmental issues with regard to mineral extraction and its impact on the environment;
- There was some support from Landowners/developers for a less restrictive policy on mineral extraction to allow new mineral resources to come forward;
- Lafarge exploring long-term development opportunities for land in their control;
- Public opposition to allocation of new areas of land for open cast coal and other mineral extraction due to the impact this would have on local communities;

- Public concern about impact of open cast coal / mineral extraction on tourism;
- There was public support for a robust policy on opencast coal and mineral extraction to ensure appropriate control, mitigation and monitoring which include financial guarantees for the restoration of any future opencast sites (ESCROW);
- Public support for the introduction of a robust policy on Unconventional Gas Extraction.

Question 25: Waste

3.27 Key messages from the responses to question twenty-five were:

- General support for the preferred approach;
- A number of suggestions may go beyond the scope of the Local Development Plan (e.g. reviewing planning permission at Oxwellmains, recycling bins).

Question 26: Minor Policy Review

3.28 Key messages from the responses to question twenty-six were:

- Scottish Government believes there should be a review of Flooding Policy which should take into account the policy position outlined in SPP 2014 on managing flood risk and drainage;
- Historic Scotland welcomes provision for a policy to protect battlefields
- National Trust for Scotland would like to see enhancement of environmental and conservation policies;
- ELC Countryside would like a review of policies regarding development in the countryside and undeveloped coast (DC1 of the adopted East Lothian Local Plan 2008);
- Support from developers for a policy supporting Tourism;
- Support from public for specific policies supporting ageing population;
- Support for review of Conservation Areas and Designed Landscape Boundaries;
- Integrate Policy DC1 and Countryside Around Towns Policy ;
- Policy to encourage better energy efficiency in new buildings;
- Support for policy to increase density of house building;

Question 27: Other Comments

3.29 Key messages from the responses to question twenty-seven were:

- Sportscotland note the increase in population of East Lothian should lead to an increase in provision of sports facilities
- Transport Scotland requires further assessments before transport infrastructure improvements can be included in the local development plan

- East Lothian Council's Amenity Services advises to the need to ensure continued supply of burial space for existing and projected population
- Some community groups believes there should be more emphasis on joined up thinking within East Lothian Council
- MIR difficult for members of the public to understand – inaccessible
- Consultation has been inadequate.

4 Conclusion

- 4.1 The amount of information within the Main Issues Report and Interim Environmental Report, and the need to engage with a wide range of audiences, meant that effective communication was essential to the consultation process.
- 4.2 Throughout the consultation process consideration was given to identifying audiences, their information needs and access to key messages. A pre-MIR report from independent body Planning Aid Scotland (PAS) made recommendations for effective communications which helped to shape the approach taken.
- 4.3 Communication focused on enabling a variety of audiences to understand and engage with the Main Issues Report and its proposals. This was achieved through direct contact and using online and offline channels and through a variety of audience-appropriate publications. Workshops and drop-in events were organised and attended by a wide range of stakeholders who looked at the proposals for East Lothian as a whole and for each cluster area in more detail. Feedback received from the event workshops and drop-in sessions was useful, identifying early themes as summarised in Part A above.
- 4.4 It is encouraging that 1,001 responses were received to the Main Issues Report from organisations and communities across the county. The Key Messages are set out in Part B above, and more detailed summaries are set out at Appendix 1 and 2 below.
- 4.5 This information will be used to feed into the preparation of the proposed Local Development Plan for East Lothian.
- 4.6 A combination of online, email and hard-copy responses were received to the consultation. The high online response rate (around 50%, excluding petitions and standard letters) reduced the time required to conduct qualitative and quantitative analysis. Care has been taken to ensure that all responses are recorded and views included within the MIR and summaries in an appropriate way.
- 4.7 The summaries are included to draw out the key points and opinions on the issues and proposals within the consultation documents. As such, they are a reflection of the responses received. They should be read in conjunction with the full responses and notes.