

IER Consultation Question Summaries

The Interim Environmental Report consultation sought views on the appropriateness of the Strategic Environmental Assessment of the options presented in the Main Issues Report. The report followed the structure of the MIR and the consultation posed a series of questions inviting comment on all aspects of the assessment. The IER consultation did not seek views on the *merits* of the options assessed, only the appropriateness of the assessment.

There are three statutory consultation authorities for Strategic Environmental Assessment (SEA) under the Environmental Assessment (Scotland) Act 2005; these are Scottish Natural Heritage, Historic Scotland, and Scottish Environmental Protection Agency. The covering letter to their detailed comments on the Interim Environmental Report are included in the section below as their detailed nature makes them difficult to summarise effectively: the full responses will be considered in the preparation of the Draft Environmental Report for the proposed Local Development Plan. These comments were submitted to the Council via the Scottish Government's SEA Gateway.

Other submissions received relating specifically to the IER are then summarised in the following section. A number of MIR responses did also make comments relevant to the IER, including about specific site assessments. To avoid duplication, the IER consultation summaries have sought to only include responses specifically made to the IER and not already covered elsewhere in the summaries of the MIR consultation responses. These responses should therefore be read in conjunction with the MIR consultation summaries for a full picture.



Our ref: PCS/137061
SG ref: SEA00670/ER

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04 February 2015

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Dear Mr McLean

**Environmental Assessment (Scotland) Act 2005
East Lothian Local Development Plan –Main Issues Report - Interim Environmental
Report**

Thank you for your Interim Environmental Report (IER) consultation submitted under the above Act in respect of the Main Issues Report (MIR) for East Lothian's Local Development Plan (LDP). This was received by SEPA via the Scottish Government SEA Gateway on 14 November 2014.

For convenience, our comments have been structured to reflect the structure of the ER. Please note, this response is in regard only to the adequacy and accuracy of the IER and any comments we have on the MIR have been provided separately in our response of 04 February 2015, our reference PCS/137036: the covering letter to this response is appended to this response.

As the LDP is finalised, East Lothian Council as Responsible Authority, will be required to take account of the findings of the Environmental Report and of views expressed on it during this consultation period. As soon as reasonably practical after the adoption of the plan, the Responsible Authority should publish a statement setting out how this has occurred. We normally expect this to be in the form of an "SEA Statement" similar to that advocated in the Scottish Government Guidance available at: www.scotland.gov.uk/Publications/2013/08/3355. A copy of the SEA statement should be sent to the Consultation Authorities via the Scottish Government SEA Gateway on publication.

Should you wish to discuss this environmental report consultation, please do not hesitate to contact me on 0131 273 [REDACTED] or via our SEA Gateway at sea.gateway@sepa.org.uk

Yours sincerely

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Appendix 1: Comments on the Interim Environmental Report (IER)

General comments

We have been impressed by the thoroughness of the IER and its accuracy in identifying impacts to SEPA's interests. Many of the comments that follow in the section below may seem minor rather than addressing the substance of the IER. The reason for addressing details only is because we believe the substance of the IER is sound and we only have relatively minor comments to make.

We appreciate especially the degree to which the development of the IER, MIR and Monitoring Statement (MS) have been integrated, with each process informing the other to produce a very lucid account of significant impacts to the environment of the options and proposals for development in East Lothian, along with realistic options to avoid, reduce, mitigate or compensate for these impacts. Although we have responded separately to the MIR, our response to it has been informed considerably by the IER, in particular the site assessments in Appendices 4 to 9, and the MS. In our view, if the findings from the IER and MS are developed and incorporated into the Proposed Plan there will be much in it which we can support.

One significant issue which is recognised in the MIR, the IER and the MS is the question of the capacity for water and drainage infrastructure to accommodate all proposals ('preferred', 'reasonable' and 'other') for development proposed in the MIR. In terms of IER and the later Environmental Report (ER), if the amount of development exceeds the capacity of water and drainage infrastructure which is currently available, or which can be made available, the conclusions for impacts on the quality of the water environment (with ecological status as an indicator of quality) may have to be significantly revised.

There are two general points which will be picked up in the answers to the consultation questions.

1. It would be useful to have a narrative or description of the symbols used in the table to indicate positive, neutral or negative. Does "positive" for instance indicate an assessment of an enhancement of an aspect of the environment or does it indicate that the impacts of one option are better than the impacts of another option? This is a rare example where the IER is not quite clear.
2. While there are advantages in addressing the 'water environment' as one issue (both flood risk and ecological status) there is a disadvantage when it comes to scoring the impacts of proposals in the IER. Many proposals in the MIR are scored as having an overall "neutral impact on the water environment". This might alter if the two issues were separated where appropriate or in particular instances. We agree that the avoidance of increased flood risk should be scored as a neutral impact. (The reduction in flood risk would be a positive impact.) Certain proposals for development, however, could have a positive impact on the ecological status of water bodies if, for instance, guided towards the removal of culverts or the re-alignment of water courses to a more natural form or if through the provision of sewage connections for new development existing premises were able to connect to mains sewers for the first time.

A last general point is that it could be useful to have a table of acronyms early in the IER. For instance, it would be useful to identify the "CA" as the three consultation authorities who we (HS, SNH and SEPA) are and our role in Strategic Environmental Assessment.

Detailed comments

As mentioned above our comments follow the structure of the IER, with most general comments preceding our response to the specific questions set in the IER.

Table B: Key Environmental Issues.

This table sets the context for issues which will be considered through the IER. It provides an early indication of the degree to which this IER addresses relationships between issues (elements of the environment) and not just issues as separate entities. An example on Page V is the role of soils in flood prevention and maintaining water quality.

It is possible that more of these relationships could be drawn out. The 'Landscape' section of Table B, for instance, identifies the need to "conserve or enhance important areas of green space and prevent town cramming". There is a relationship between this aim and the objective of maintaining air quality.

Importantly, Table B highlights a choice identified in IER, MIR and MS in the options for development in East Lothian: development concentrated in west East Lothian could have significant impacts on air quality; dispersed development in east East Lothian will not create new or exacerbate existing problems with air quality but it will result in increased CO2 emissions. The IER, MIR and MS identify the need to strike a balance between these objectives and SEPA will be happy to provide any assistance we can in identifying this balance.

3.2.2 Water. Water Quality.

Page 29. "Most of this flow accumulates in the Whiteadder Reservoir before passing into the River Tweed Special Area of Conservation in the Scottish Borders Council area. Water bodies can act as pathways between development and protected sites. The ecological and morphological status of the water environment must be maintained and enhanced." This is an important point to note in relation to the protection of designated sites but it is also illustrative of the overlaps between SEA objectives and the interest and advice of the CA. Advice SEPA can give, for instance, on preventing or mitigating detrimental impacts to the morphology of water bodies could assist in the assessments, e.g. the Habitats Regulations Appraisal, of impacts to designated sites.

Consultation Question 1: Current State of the Environment.

Yes, we consider that this section provides sufficient and appropriate information on the current state of the environment in East Lothian and we have nothing further to add.

Consultation Question 2: Key Environmental Issues

Yes, we consider the issues described are the key environmental issues relevant to the LDP. It is possible that more could be made of the relationships between issues. In Table 8, for instance, relationships between 'Water' and 'Air' and 'Human Health' could be made: deterioration in air quality and the experience of being flooded, for instance, have significant impacts on human health.

Consultation Question 3: Evolution of the Baseline without the LDP.

Yes, we think the potential changes to the environmental baseline are the key issues that would be relevant if a LDP was not prepared.

Consultation Question 4: Draft Aims & Objectives for the LDP.

Yes, we think the SEA of the draft LDP aims and objectives is appropriate. We do ask, however, for a clarification on whether “positive” indicates an assessment of an enhancement of an aspect of the environment or if it indicates that the impacts of one option are better than the impacts of another option.

Consultation Question 5: Sustainability & Climate Change.

Yes, we consider the SEA of the preferred approach is appropriate. As mentioned above, the IER, MIR and MS all recognise a difficult choice between the options for development in East Lothian: development concentrated in west East Lothian could have significant impacts on air quality; dispersed development in east East Lothian will result in increased CO2 emissions. The IER, MIR and MS identify the need to strike a balance between these objectives and SEPA will be happy to provide any assistance we can in identifying this balance.

Consultation Question 6: Development Locations.

Yes, we think the SEA of the preferred approach is lucid and accurate as well as appropriate.

Consultation Question 7. Development Locations.

Yes, we think the SEA of the alternative approaches is appropriate. There is a clear example in this section of an assumption that is **not** made throughout this IER. There can be a tendency in some SEA to assume that CSGN (and other green and blue infrastructure) will compensate for some or many significant impacts such as loss of soils that store water leading to increased flood risk. This IER presents the mitigation CSGN can provide, but it does not assume that it will provide like-for-like compensation.

Consultation Question 8: Town Centres.

Yes, we think the SEA of the preferred approach is appropriate, but we think that this section of the SEA could be developed. We agree that vibrant town centres can reduce the need to travel further afield, but dense town centre development can possibly lead to deterioration of air quality. Also, the assessment, which includes a new town centre at Blindwells, gives an overall assessment of ‘neutral effect’ on the water environment. A neutral effect depends on a number of actions and circumstances. Please see our response of 13 January 2015 (our reference PCS/137514) (attached) to planning application 14/00768/PPM.

Consultation Question 9: Town Centres.

Please see our answer to Question 8.

Consultation Question 10: Planning for Employment.

Yes, we believe the SEA of the preferred approach is appropriate. We agree there would be a neutral effect on the water environment (in some cases a positive benefit) if the detail in the site specific assessments are taken forward and incorporated in the LDP.

Consultation Question 11: Planning for Employment.

Please see our answer to Question 10.

Consultation Question 12: Planning for Housing

Yes, we think the SEA of the preferred approach is appropriate, but please see our response to planning application 14/00768/PPM (our reference PCS/137514). Also, it is appropriate to make the conclusions in the table preceding Question 12, if the detail in the site specific assessments are taken forward and incorporated in the LDP.

Consultation Question 13: Planning for Housing.

Please see our answer to Question 12.

Consultation Question 14: Green Belt.

Yes, we consider the SEA of the preferred approach is appropriate. We are not certain, however, about the conclusions of impact on the water environment. SEPA has no interest in the Green Belt, per se, but in assessing land to be removed from green belt, consideration should be given to identifying loss of water storage which could lead to increased flood risk to existing and new communities, impacts on the quality of the water environment, etc.

Consultation Question 15: Green Belt.

Yes, we think the SEA of the alternative approach is appropriate. While there are less obvious impacts to the water environment, there are impacts to air quality (and human health) and CO2 emissions (and climate change). These impacts are possibly more difficult to avoid than, for instance, increased flood risk if land for release from the green belt was carefully identified: please see our answer to Question 14.

Consultation Question 16: Countryside Around Towns.

Please see our answers to Questions 14 & 15.

Consultation Question 17: Countryside Around Towns.

Please see our answers to Questions 14 & 15.

Consultation Question 18: Central Scotland Green Network

Yes, we think the SEA of the preferred approach is appropriate. As mentioned in the answer to Question 7, East Lothian's approach of not viewing CSGN as like-for-like compensation for a range of impacts sets a framework for CSGN (and other green and blue infrastructure) to be assessed more accurately for its potential to provide mitigation for negative impacts. The potential for positive benefits could be explored further. The IER identifies, for instance, positive impacts on air but this section could be developed further to identify enhancements to the quality of the water environment.

Consultation Question 19: Central Scotland Green Network.

Yes, we consider the SEA of the alternative approach is appropriate. (Please see responses to Questions 7 and 18.) This assessment identifies, correctly in our view, that the lack of detail Supplementary Guidance could provide could limit the potential for CSGN to lead to enhancements as well as neutral impacts as well as providing some mitigation for negative impacts.

Consultation Question 20: Development in the Countryside & on the Coast.

Yes, we think the SEA of the preferred approach is appropriate, although there could be a little more emphasis on avoiding development where there is a risk of coastal flooding.

Consultation Question 21: Development in the Countryside & on the Coast.

Yes, we consider the SEA of the alternative approach is appropriate. It would be useful to consider, however, that the development of individual or small groups of houses in the countryside are likely not to be in areas served by connections to the Scottish Water sewer network. This could put pressure on the quality of the water environment, especially where this is already under pressure. There is a potential for a negative impact, therefore, on the water environment.

Consultation Question 22: Cumulative Assessment of Preferred Spatial Strategy Approaches.

Yes, we consider that the SEA of the preferred approach is appropriate, with some qualifications.

We are uncertain if the 'positive' scoring identifies an enhancement or a least negative outcome.

The commentary leading to this question identifies uncertainties regarding air quality and the need for mitigation which would have to be effective and assured before a positive impact on human health could be concluded. Also, unless air quality could be improved by effective strategies, the most accurate and best outcome might be a 'neutral' scoring for air quality and human health.

A neutral impact on the water environment is predicted. Please see point 2 in General Comments. If the water environment includes both flood risk and ecological status of water bodies, positive and negative impacts could neutralise each other and lead to a neutral score. If the LDP assures no increase flood risk there is a neutral impact. If, as is possible, there are improvements leading to enhanced ecological status there is a positive impact. Rather than split the water objective, a '0/+' scoring could be possible.

Consultation Question 23: Cumulative Assessment of Alternative Spatial Strategy Approaches.

Yes, we consider that the SEA of the preferred approach is appropriate, with some qualifications. Please see our answer to Consultation Question 22. Dispersed growth away from west East Lothian could locate development in non-sewered areas or where there are capacity issues. This could lead to additional pressure on the water environment (with "ecological status" as an indicator of this) or if additional development led to additional capacity or enabled more connections to the sewer network for existing as well as new development this could have a positive impact on the water environment. This, as the IER recognises, however, would be at the cost of increased CO2 emissions.

Consultation Question 24: Developer Contributions.

Please see SEPA's response to the MIR of 04 February 2015 (our reference PCS/137036). While it is not a developer contribution, per se, there is a need for site specific flood risk assessments to accompany and inform planning applications for several sites.

Consultation Question 25: Developer Contributions.

Please see our answer to Question 24.

Consultation Question 26: Affordable Housing.

Yes, the SEA of the preferred approach is appropriate. We have no particular comments on affordable housing as distinct from any other housing development.

Consultation Question 27: Affordable Housing.

Please see our answer to Question 27.

Consultation Question 28: Energy, Including Renewable Energy.

Yes, the SEA of the preferred approach is appropriate. There seem to be a number of uncertainties and dependencies to be clarified before some neutral impacts can be identified, e.g. mitigation of impacts to air quality. "Securing mitigation for flood risk": this mitigation would have to be compliant with the Flood Risk Management (Scotland) Act 2009 and Scottish Planning Policy.

Consultation Question 29: Energy, Including Renewable Energy.

Yes, the SEA of the alternative approach is appropriate. Please see our answer to question 28.

Consultation Question 30: Minerals, Including Aggregates & Coal.

Yes, we think the SEA of the preferred approach is appropriate. Please see previous comments on the "positive" scoring, dependencies and identifying separate outcomes for flood risk and ecological status.

Consultation Question 31: Minerals, Including Aggregates & Coal.

Yes, the SEA of the alternative approach is appropriate.

A neutral effect on the water environment is predicted. If the reasonable alternative was developed and additional sites for minerals, including aggregates and coal, were identified, the LDP and/or Supplementary Guidance and the SEA would need to address impacts to (and from) ground water and mine waste water, and the implications for increased flood risk and the deterioration of ecological status. Please see our response to planning application 14/00768/PPM (our reference PCS/137514), Blindwells.

Consultation Question 32: Waste

Yes, we think the SEA of the preferred approach is appropriate, but there is the potential for some positive outcomes if waste was linked more closely to the energy section, e.g. energy from waste.

Consultation Question 33: Waste

Yes, we think the SEA of the alternative approach is appropriate. Please see our response to Question 32.

Consultation Question 34: Mitigation

Yes, the proposed mitigation measures are sufficient and appropriate. It would be a positive development of the SEA (and the LDP), however, if these measures were developed in greater detail with proposals for implementation.

Consultation Question 35: Monitoring.

We agree with the commentary preceding this question and with commentary in section 1.3.2 and elsewhere in the IER that one of the most important and most challenging aspects of SEA is to identify indicators to identify positive and negative impacts on the environment which can be traced directly to the consequences of the LDP and which can be monitored effectively and without the use of resources which cannot be afforded.

Identifying meaningful indicators and how they can be monitored without the undue use of resources may be worth a workshop with members of the CA, the development plan team, other teams in East Lothian Council and anyone else you believe could contribute.

Consultation Question 36: Limitations of the Assessment.

Yes, we think this is a very accurate description of the limitations of a SEA of a LDP. We would like to add, however, that this SEA is particularly comprehensive and tests these limitations rather than being constrained by them.

Consultation Question 37: Site Assessments (Appendices 4 – 9)

The site assessments are very thorough and useful. Information in the site assessments have been used to inform our response to the MIR.

Consultation Question 38: Other Comments.

In SEPA's view, if the findings from the IER and site assessments are developed and carried forward in the Proposed Plan we will be more than satisfied.

Other Relevant Plans, Policies & Strategies.

Page 204. The "Flood Risk Management (Scotland) Bill 2008 (as introduced)" should be replaced with "The Flood Risk Management (Scotland) Act 2009".



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Our ref: LDP/ELOTH
Our Case ID: 201405267
Your ref: 00670 ENVIRONMENTAL
REPORT
06 February 2015

Dear Mr McLean

**Environmental Assessment (Scotland) Act 2005
East Lothian Local Development Plan – Main Issues Report
Interim Environmental Report**

Thank you for consulting Historic Scotland on the Interim Environmental Report (IER) for the East Lothian Local Development Plan (LDP) – Main Issues Report (MIR). Our review of the ER is undertaken in our capacity as a Consultation Authority under the Environmental Assessment (Scotland) Act 2005. As you are aware, we are providing our view on the MIR separately through the Scottish Government's Directorate for Local Government and Communities.

None of the comments contained in this letter should be construed as constituting a legal interpretation of the requirements of the SEA Act. They are intended rather as helpful advice, as part of Historic Scotland's commitment to capacity-building in SEA.

General Comments and Non-Technical Summary

I noted that in general in the document, reference is often made to protecting the historic environment, and rarely to enhancing it. While this may be a minor omission, it means that often where a potentially positive impact could have been identified, it goes unrecorded. There are some specific instances of this in the assessments, which are referred to below. The wording in Table C: Potential Changes to the Environmental Baseline without the LDP is a good example of capturing both potential positive and negative impacts.

Throughout the document, it is often assumed that cultural heritage is protected by the policies of the LDP. While we consider that this is appropriate, as this is fundamental to a lot of the assessment, we would welcome the opportunity to comment on the draft policies as early as possible. This will allow us to contribute to the process of ensuring that they are worded to provide the level of protection expected by the assessment.

On a minor note regarding terminology, I noticed that scheduled monuments are often referred to as scheduled ancient monuments, or SAMs, in the document. We would recommend that this is updated to say simply scheduled monuments or SMs, to reflect current legislation, and acknowledge the fact that not all such sites can be classed as "ancient".



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Consultation Question 1: Current State of the Environment

We consider that sufficient information is provided in this section for our cultural heritage interests. We have some suggestions for minor alterations/additions, which are given below.

3.2.1 Landscape

The landscape map in this section is very helpful in giving an overview of the landscape in the local authority, and we welcome the fact that inventory gardens and designed landscapes are marked on this. You may want to consider adding inventory battlefields to the map, as these also contribute significantly to the wider East Lothian landscape.

3.2.6 Cultural Heritage, including Architectural & Archaeological Heritage

This section refers to Scheduled Monuments and Listed Buildings having legislative protection, and I assume that this refers to the consenting regimes for works to these heritage assets. It should perhaps also be noted that Conservation Areas have a similar regime. It would be helpful here to refer specifically to impacts on the settings of heritage assets, as this would provide an example of what is meant by indirect effects.

3.2.7 Material Assets

We welcome the fact that buildings at risk are identified in this section in the document. In the explanation of the range of buildings that this covers, it may be useful to identify the heritage value of these buildings, some of which are listed at category A and therefore considered to be of national importance, but all of which are at least locally important.

Consultation Question 2: Key Environmental Issues

We welcome the fact that minimising impacts on cultural heritage is identified as a Key Environmental Issue. However, we consider that it may be helpful to provide more detail in this statement. In particular, identifying the protection of setting of heritage assets as a concern would be valuable, as this is an issue referenced later in the document. We would also recommend that the wording here reflects that in SPP – referring to preserving and enhancing historic environment features. This would allow for recognition of positive impacts, rather than simply the minimisation of negative impacts.

Consultation Question 3: Evolution of the Baseline without the LDP

We consider that the key issues have been identified for cultural heritage in this table. Consideration should perhaps be given to promotion of the historic environment, an issue which the LDP may contribute positively towards, particularly in relation to Battlefields. This may be the case in discussion of issues such as place-making, for example.

Consultation Question 4: The Strategic Environmental Assessment

I noted that the introduction to this section explains that the SEA evaluates the effects of the 'preferred approach' and its 'reasonable alternatives'. As there are a number of allocations identified in the MIR which belong to neither category (marked as "OTH"), there may be an opportunity here to clarify whether or not these are also assessed, and identify them as belonging to neither approach, if this is appropriate.

For the majority of the assessments in this section, heritage impacts are considered to be neutral, due to the application of LDP policy. Whilst we consider this is generally the case, there are instances where minimisation of landscape impacts could also have a positive

impact on historic environment features, particularly in terms of protecting setting. However, this is a minor issue, and unlikely to change the conclusions of the assessment.

Green Belt

The assessment finds that there is likely to be a neutral impact on heritage for both the preferred and reasonable alternative strategies. The narrative states only that the application of policy prevents negative impacts upon heritage assets. However, consideration could perhaps be given to impacts from settlement coalescence, which may impact conservation areas and the character of settlements. The release of green belt land may also affect assets not currently protected by other policies, such as non-inventory gardens and designed landscapes and other non-designated sites.

Countryside Around Towns

We agree that this policy has the potential to have a minor positive impact on the historic environment, and note that another contributory factor to this may be the prevention of settlement coalescence (see comments above regarding green belt).

Other Relevant Plans, Policies and Strategies

The section here that refers to SHEP could, as mentioned above, also refer to opportunities to enhance the historic environment. It may also be relevant to refer here to Our Place in Time: The Historic Environment Strategy for Scotland, PAN 2/2011: Planning and Archaeology, and Historic Scotland's Managing Change Guidance Note Series.

SEA Framework Methodology

The references here to "local archaeological sites" may be unclear, as these sites may be of regional or national importance (as scheduling is an on-going process). It may therefore be simpler to identify these as "undesigned archaeological sites".

Spatial Strategy

In this section, we have looked in detail only at those sites on which commented in our response to the MIR. We are broadly content with the assessment, and consider the way in which it has been presented to be very clear and accessible. This was slightly affected by the fact that references used here differed from the MIR. Whilst this was overcome by information provided by the council, variations in boundaries between the two documents in some instances make it less clear what is being assessed. The summaries of historic environment features in each cluster area provided a useful introduction, though I did note that the details for Prestonpans omit any reference to Prestonpans Battlefield, and this would probably be a useful addition.

Commentary on specific site assessments is given below.

PM/MH/HSG056 Old Craighall village

In our response to the MIR we noted the change in boundary to this allocation (PREF-M3(a)), to exclude the area immediately north-east of the A-listed Monkton House. However, this site for assessment includes the excluded land. It is therefore not clear whether or not this mitigation is being taken into account in the conclusions drawn, as the narrative states that HS have recommended the alteration but it has not taken place. If this area is not excluded, we consider that this allocation has the potential to have significant negative impacts on the historic environment. If it is excluded, we agree with the conclusion of a minor negative or uncertain impact.

PM/MH/HSG113 Edenhall Hospital

We welcome the fact that the narrative for this site assessment refers to the conversion and retention of category C listed buildings, and recommend that consideration is given to this as a potential positive impact on the historic environment, in ensuring the future viability of these buildings.

PM/MH/HSG067 South West Wallyford

We consider that development in some parts of this site would have a very negative impact on the historic environment – particularly the area to the south-west of the greyhound stadium development. In our commentary on the MIR (site OTH-M14) we stated that we would object to development in this part of the allocation. If this area is not excluded from development, we would consider this a very negative impact on the historic environment, raising national issues. However, for the part of this allocation identified as PREF-M12 in the MIR, and the irregular area to the north-west of this, we consider that it would be likely to be possible to mitigate significant impacts through the appropriate application of policy.

PM/MH/HSG055 Land north of Whitecraig

The commentary here should be updated to remove the reference to possible scheduling within the site, as this review has taken place and no designation was made.

I hope that this has been helpful to you. Should you wish to discuss any of the issues raised in this letter, please do not hesitate to contact me on 0131 668 [REDACTED].

Yours sincerely



Ruth Cameron
Senior Heritage Management Officer, EIA



Scottish Natural Heritage
Dualchas Nàdair na h-Alba

All of nature for all of Scotland
Nàdar air fad airson Alba air fad

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Sent by email via: sea.gateway@scotland.gsi.gov.uk

02 February 2015
Our ref: CEA134099 / A1494214
Your ref: 00670

Dear Phil

Environmental Assessment (Scotland) Act 2005
East Lothian Council Local Development Plan – Interim Environmental Report

Thank you for consulting Scottish Natural Heritage (SNH) on the Interim Environmental Report (ER) for the above Main Issues Report (MIR). We will be responding separately to the MIR.

Our comments in the attached Annex reflect our earlier comments at scoping stage and on the first draft Environmental Report. We also provide comment on the assessment and the proposed monitoring and mitigation.

We welcome the decision to include questions in the Interim Environmental Report. As consultees on both the SEA and the MIR, this approach supports our efforts to co-ordinate and link our responses on these documents.

If you would like to discuss any of the content of this letter and Annex further, please contact our planning advisor Vivienne Gray on 0131 316 [REDACTED] or via the SEA gateway sea.gateway@snh.gov.uk in the first instance.

Yours sincerely

[by email]

Niall Corbet
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Annex – Consultation questions

As noted in our letter, our comments below reflect previous advice we have given on the SEA of the MIR, in addition to the assessment, monitoring and mitigation presented in the Interim Environmental Report. As further changes are likely during the Plan preparation process and in response to representations to the MIR we would be happy to discuss these points further at any time.

Question 1: Current state of the environment

Do you think this section of the Interim Environmental Report provides sufficient and appropriate information on the current state of the environment in East Lothian?

If you think any changes should be made, what would be they be?

Do you have any other comments on this section?

Landscape

We agree with the key message on landscape (page 29), particularly that of consolidating settlement pattern and structure, ensuring landscape fit and avoiding coalescence if possible. However, we also note that some of the potential allocations in the MIR may (wholly or in part) prove challenging to deliver if the aim of avoiding coalescence is to direct development in East Lothian in practice. We have provided more detailed comment, including advice on opportunities for mitigation, in our response to the MIR.

Biodiversity, flora and fauna

We agree with the key message for biodiversity, flora and fauna in general. However, direct impact of development within designated sites is unlikely to be an issue due to legislative and policy protection. We consider that off-site impacts from land use change are often a greater threat to protected areas than direct impacts. This should be reflected in your Habitats Regulations Appraisal (HRA), which we will provide further advice on at the appropriate time.

The green network should also be included in the key message. The multiple benefits delivered through planning for green networks include biodiversity, particularly securing and enhancing habitat connectivity, as well as their role in helping to mitigate the impacts of development on this topic area.

Soils

We agree with the key message on soils, particularly that the LDP can help conserve or enhance soil quality, quantity and function by prioritising previously developed land and buildings. However, as discussed in our response to Questions below, it seems unlikely that the LDP will achieve this.

Question 2: Key environmental issues

Do you think that the issues described above are the key environmental ones relevant to the Local Development Plan?

If you think any changes should be made, what would they be?

Do you have any other comments to make on this section?

Biodiversity, flora and fauna

We agree with the issues identified under the Biodiversity, Flora and Fauna topic. However, our advice is that biodiversity and ecological networks should not be separated out from green networks (reference page 77), particularly as the scope of the final bullet point appears to encompass ecological connectivity, effectively leading to this figuring as a

double issue. In support of this we refer to Scottish Planning Policy (SPP), paragraph 222 which clearly sets out green networks as encompassing biodiversity, amongst other interests.

We welcome the recognition of the role of green networks in supporting increased physical activity and active travel, as set out under the Human Health topic.

Landscape

The issues identified against the Landscape topic are appropriate. However, we believe that a number of allocations may be challenging to deliver when considered against these issues, particularly coalescence as discussed under Question 1 above. We have offered advice on these points in our response to the MIR.

Question 3: Evolution of the baseline without the LDP

Do you think that the potential changes to the environmental baseline described above are the key ones that are relevant if a Local Development Plan for East Lothian were not prepared?

If you think any changes should be made, what would they be?

Do you have any other comments on this section?

Biodiversity, flora and fauna

In the case of international and national sites it is unlikely that the absence of the LDP would mean they were less protected. We agree that local sites would likely be less protected and that wider opportunities to secure natural heritage benefits would be reduced.

Soils

We agree with the potential changes set out here. However, the assessment (read alongside the MIR and detail in the site assessments) does not appear likely to achieve what is set out in table 9, particularly the prioritisation of brownfield land. We have provided further comment on this under Question 4 below.

We do however agree overall, for all SEA objectives and not just Soil, that the presence of the LDP presents a greater likelihood of achieving efficient use of land. In support of this, we have offered detailed comments in our MIR response on what would be required to achieve this outcome.

Landscape

We agree with the potential changes set out here.

Question 4: Draft Aims and Objectives for the LDP

Do you think that the strategic environmental assessment of the draft LDP aims and objectives is appropriate?

If you think any changes should be made, what would they be?

Do you have any other comments to make?

In general, we consider the draft LDP aims and objectives to be appropriate. However, as outlined in response to Question 1, several of the potential allocations are likely to be challenging to deliver when considered against the objective of protecting and enhancing the area's high quality environment and special identity. In that respect, we consider that the assessment of the draft Aims and Objectives requires review.

For example, the overall score for Soil is unlikely to be significantly positive as the spatial strategy directs development to greenfield land, contrary to the prioritisation of brownfield land set out elsewhere in the MIR. A consequence of this would be soil loss, sealing and

<p>so on. The assessment should therefore more accurately be negative overall.</p> <p>The same would be true of the assessment of Biodiversity where very positive effects are also predicted. In general, we agree that this could be a likely outcome; however, it is heavily reliant on mitigation achieved in part through the strategic enhancement of East Lothian's green network. At this stage, there is insufficient detail on likely requirements for development frameworks and site briefs to allow us to agree that the mitigation would be delivered as required.</p> <p>We support the objective that the LDP will encourage active travel opportunities. Where possible, active travel should be integrated with the green network and green infrastructure. The initial assessment that new development should be properly integrated with surroundings and contribute to wider sustainability and place-making objectives should be informed by the work we have carried out with you on green networks. In this respect, we consider active travel to be part of place-making. Similarly, the green network and green infrastructure should be included in the assessment as helping to make efficient use of land.</p> <p>As far as we are able to at this stage, our response on the MIR and to subsequent questions in this consultation offers advice on likely impacts and opportunities.</p>
<p>Question 5: Sustainability and climate change</p> <p>Do you think that the strategic environmental assessment of the preferred approach is appropriate?</p> <p>If you think any changes should be made, what would they be?</p> <p>Do you have any other comments to make?</p>
<p>We are unclear on the assessed impact of the preferred strategy approach as having a neutral effect on SEA objectives for sustainability and climate change. While the approach is embedded in the spatial strategy and directed by the Strategic Development Plan (SDP) we would nevertheless expect this embedded approach to result in a positive rather than a neutral effect.</p> <p>While it may not be possible to identify very positive effects, we consider it likely that an embedded approach to sustainability should at least aim to be positive for objectives such as biodiversity and resilience to climate change.</p>
<p>Question 6: Development locations</p> <p>Do you think that the strategic environmental assessment of the preferred approach is appropriate?</p> <p>If you think any changes should be made, what would they be?</p> <p>Do you have any other comments to make?</p>
<p>Biodiversity, flora and fauna</p> <p>The early indication that project-level EIA may be required for some sites which have been considered in relation to Habitats Regulations Appraisal (HRA) should be accompanied by reference to project-level HRA. The HRA of the Plan does not omit the need for further assessment as more detailed proposals for sites come forward.</p> <p>We agree that the preferred strategy offers scope for mitigation and delivery of multiple benefits via strategic creation and enhancement of the green network. However, as discussed at Question 4 above, there is as yet insufficient detail on how site requirements will be set out and how delivery will be secured. We have offered advice on how these measures should be secured in our response to the MIR.</p>

Soils

We agree with the predicted effect on soils at the site level. However, we believe that the discussion of Blindwells as 'previously developed land' in the assessment is misleading as our understanding of the preferred approach to Blindwells is that it includes allocation of land which is also greenfield.

We also note that the assessment of this individual aspect of the spatial strategy is at odds with the overall assessment as discussed under Question 4 above.

Landscape

In general, we agree with the assessment of effect of development on landscape objectives. However, we consider project-level EIA and other specialist studies are not the only requirements, as set out below, needed to address predicted effects on landscape or other SEA objectives.

Mitigation

LDP strategy and policies along with project-level EIA and masterplans are appropriately identified as mitigation. However, we consider that design tools for making better places, as set out in paragraph 57 of SPP also play an important role in achieving the vision of East Lothian as "*an outstanding area in which to live, work and do business*". We have provided more detailed comment on this issue in our MIR response.

Question 7: Development locations

Do you think that the strategic environmental assessment of the alternative approach is appropriate?

If you think any changes should be made, what would they be?

Do you have any other comments to make?

Biodiversity, flora and fauna

The individual score for objective B1 (page 97) is unknown. We think this better reflects the current understanding of potential effects on international designated sites than the assessment text. At this stage, the unknown score (for both preferred and alternative approaches) ties in well with the screening of the Plan for likely significant effect, a precursor to any assessment of effect on site integrity.

Please refer to our comments under Question 6 for other issues.

Question 8: Town centres

Do you think that the strategic environmental assessment of the preferred approach is appropriate?

If you think any changes should be made, what would they be?

Do you have any other comments to make?

We note that the assessment identifies no direct impact on open space, habitat and green networks in relation to the preferred strategy for town centres. In addition to opportunities for retrofitting green infrastructure elements in town centres, which play a role in future resilience and quality of place, the new town centre at Blindwells offers an opportunity to deliver a high quality place incorporating open space and green networks.

In both existing and new settlements the green network has an important role to play in supporting short journeys from home to shops and work, and in linking local centres with town centres in a network through development. Given these opportunities we believe that the score for biodiversity, flora and fauna should be positive. Similarly, objectives H1 and H2 would also be met by this approach and, if these requirements are to be adopted,

these objectives should also be scored as positive rather than unknown.
<p>Question 9: Town centres</p> <p>Do you think that the strategic environmental assessment of the alternative approach is appropriate?</p> <p>If you think any changes should be made, what would they be?</p> <p>Do you have any other comments to make?</p>
Please see our response to Question 8.
<p>Question 10: Planning for employment</p> <p>Do you think that the strategic environmental assessment of the preferred approach is appropriate?</p> <p>If you think any changes should be made, what would they be?</p> <p>Do you have any other comments to make?</p>
We have no comments to make on the assessment of the preferred strategy.
<p>Question 11: Planning for employment</p> <p>Do you think that the strategic environmental assessment of the alternative approach is appropriate?</p> <p>If you think any changes should be made, what would they be?</p> <p>Do you have any other comments to make?</p>
We have no comments to make on the assessment of the alternative strategy.
<p>Question 12: Planning for housing</p> <p>Do you think that the strategic environmental assessment of the preferred approach is appropriate?</p> <p>If you think any changes should be made, what would they be?</p> <p>Do you have any other comments to make?</p>
We broadly agree with the assessment of the preferred strategy. However, as set out in our response to Question 6, we consider that design tools for making better places, as set out in paragraph 57 of SPP will play an important role in achieving the vision of East Lothian as “ <i>an outstanding area in which to live, work and do business</i> ”. We have provided more detailed comment on this issue in our MIR response.
<p>Question 13: Planning for housing</p> <p>Do you think that the strategic environmental assessment of the alternative approach is appropriate?</p> <p>If you think any changes should be made, what would they be?</p> <p>Do you have any other comments to make?</p>
Please see our response to Question 12.
<p>Question 14: Green belt</p> <p>Do you think that the strategic environmental assessment of the preferred approach is appropriate?</p> <p>If you think any changes should be made, what would they be?</p> <p>Do you have any other comments to make?</p>

<p>Biodiversity, flora and fauna</p> <p>We agree that with the appropriate application of design tools, release of land within the green belt could be achieved in such a manner that there are very positive effects for biodiversity, flora and fauna. However, if the stated objective of protecting and enhancing the area's high quality environment and its special identity (page 31 of the MIR) is to be achieved, clearer protection of the natural assets in the area will be required.</p> <p>A positive outcome for change in this area is dependent on a clearly set out approach to the strategic green network accompanied by a clear expression of requirements for individual allocations. It is important that green infrastructure and green networks are planned in a manner which allows these areas to continue to contribute towards green belt objectives of protecting and enhancing the character, landscape setting and identity of the settlement and protecting and providing access to open space (paragraph 49, SPP).</p> <p>Landscape</p> <p>We generally agree with the assessment of landscape impacts and welcome the recognition that co-ordinated cross-boundary solutions will be required. While masterplanning will play an important role, the strategic nature of any likely solutions means that design frameworks and development briefs will be required.</p> <p>We have provided more detailed advice on these issues in our MIR response.</p>
<p>Question 15: Green belt</p> <p>Do you think that the strategic environmental assessment of the alternative approach is appropriate?</p> <p>If you think any changes should be made, what would they be?</p> <p>Do you have any other comments to make?</p>
<p>Biodiversity, flora and fauna</p> <p>We are unclear as to how the alternative approach would present similar opportunities for the green network, active travel, woodland planting, open space provision and habitat connectivity as the preferred approach. The preferred approach could realise these opportunities through well-planned and designed development whereas the alternative approach does not propose such changes and appears likely to rely on other mechanisms such as the Scottish Rural Development Programme (SRDP). Therefore, while the outcome may be positive, detail on how this may happen is lacking. We consider a more realistic score at this point would be neutral.</p>
<p>Question 16: Countryside around towns</p> <p>Do you think that the strategic environmental assessment of the preferred approach is appropriate?</p> <p>If you think any changes should be made, what would they be?</p> <p>Do you have any other comments to make?</p>
<p>We have no comments to make on the assessment of the preferred strategy.</p>
<p>Question 17: Countryside around towns</p> <p>Do you think that the strategic environmental assessment of the alternative approach is appropriate?</p> <p>If you think any changes should be made, what would they be?</p> <p>Do you have any other comments to make?</p>
<p>We have no comments to make on the assessment of the alternative approach.</p>

<p>Question 18: Central Scotland Green Network</p> <p>Do you think that the strategic environmental assessment of the preferred approach is appropriate?</p> <p>If you think any changes should be made, what would they be?</p> <p>Do you have any other comments to make?</p>
<p>We agree with the assessment of the preferred approach to the Central Scotland Green Network (CSGN).</p> <p>We provide further advice on green networks in our MIR response, but emphasise that our work with you has highlighted the importance of a structured approach to the proposed green network Supplementary Guidance. As stated in the assessment presented in the interim ER, this should be based on development of sites with detail on site briefs, standards for new developments, wider green network safeguarding, enhancement and so on.</p> <p>We look forward to further discussion with you on shaping policy and guidance on the green network.</p>
<p>Question 19: Central Scotland Green Network</p> <p>Do you think that the strategic environmental assessment of the alternative approach is appropriate?</p> <p>If you think any changes should be made, what would they be?</p> <p>Do you have any other comments to make?</p>
<p>We agree with the assessment of the alternative approach to the Central Scotland Green Network (CSGN).</p>
<p>Question 20: Development in the countryside and on the coast</p> <p>Do you think that the strategic environmental assessment of the preferred approach is appropriate?</p> <p>If you think any changes should be made, what would they be?</p> <p>Do you have any other comments to make?</p>
<p>Biodiversity, flora and fauna</p> <p>As noted against other themes in the interim ER, our advice in relation to the Firth of Forth SPA and Forth Islands SPA has included indirect impacts such as loss of off-site feeding areas and connectivity between development and the designated sites via watercourses. We agree with the overall assessment of this objective but suggest that it should be recognised that indirect, off-site impacts are also considered.</p>
<p>Question 21: Development in the countryside and on the coast</p> <p>Do you think that the strategic environmental assessment of the alternative approach is appropriate?</p> <p>If you think any changes should be made, what would they be?</p> <p>Do you have any other comments to make?</p>
<p>We have no comments to make on the assessment of the alternative approach.</p>
<p>Question 22: Cumulative assessment of preferred spatial strategy approaches</p> <p>Do you think that the strategic environmental assessment of the preferred approach is appropriate?</p> <p>If you think any changes should be made, what would they be?</p>

Do you have any other comments to make?
In general, we agree with the assessment of the preferred spatial strategy approaches. However, we note that if the predicted effects are to be secured or avoided (as appropriate), an evidence based, structured approach to design such as development frameworks and site briefs will be required. In relation to our remit, we see the design-led approach set out in SPP as being integral to identifying and securing appropriate mitigation for East Lothian's landscape and natural heritage.
Question 23: Cumulative assessment of alternative spatial strategy approaches
Do you think that the strategic environmental assessment of the alternative approach is appropriate?
If you think any changes should be made, what would they be?
Do you have any other comments to make?
Please see our response to Question 22.
Question 24: Developer contributions
Do you think that the strategic environmental assessment of the preferred approach is appropriate?
If you think any changes should be made, what would they be?
Do you have any other comments to make?
We have no comments to make on the assessment of the preferred approach.
Question 25: Developer contributions
Do you think that the strategic environmental assessment of the alternative approach is appropriate?
If you think any changes should be made, what would they be?
Do you have any other comments to make?
We have no comments to make on the assessment of the alternative approach.
Question 26: Affordable housing
Do you think that the strategic environmental assessment of the preferred approach is appropriate?
If you think any changes should be made, what would they be?
Do you have any other comments to make?
We have no comments to make on the assessment of the preferred approach.
Question 27: Affordable housing
Do you think that the strategic environmental assessment of the alternative approach is appropriate?
If you think any changes should be made, what would they be?
Do you have any other comments to make?
We have no comments to make on the assessment of the alternative approach.
Question 28: Energy, including renewable energy
Do you think that the strategic environmental assessment of the preferred approach is appropriate?
If you think any changes should be made, what would they be?

Do you have any other comments to make?

Cockenzie

The situation at Cockenzie is a complex one. It is currently identified in NPF3 as a national development (conversion to a combined cycle gas turbine power station) and also as a nationally significant site (supporting the marine renewable industry) and therefore an Area of Co-ordinated Action. The status and impacts of these potential uses of the site differ and we agree that effects on biodiversity are generally unknown at present.

Similarly, the potential extent of development and associated change at Cockenzie means that effects on landscape objectives may also be best described as unknown. However, in the absence of further detail, particularly adequate landscape scale mitigation measures, at present it does seem appropriate to conclude that a negative effect would be likely.

We have provided more detailed comment on this site in our MIR response.

Renewable energy

We agree with the assessment of the preferred approach.

Question 29: Energy, including renewable energy

Do you think that the strategic environmental assessment of the alternative approach is appropriate?

If you think any changes should be made, what would they be?

Do you have any other comments to make?

It is not clear from the assessment how the addition of policy and/or guidance for other forms of renewables such as solar and small-scale hydro schemes have been considered against the SEA topics and objectives.

Our understanding at this point is that the alternative approach appears to offer greater environmental protection than the preferred approach, as demonstrated by the assessment of the climate topic which leads to an overall more positive score.

Question 30: Minerals, including aggregates and coal

Do you think that the strategic environmental assessment of the preferred approach is appropriate?

If you think any changes should be made, what would they be?

Do you have any other comments to make?

We note that the preferred policy approach is to develop policy to manage proposals for the extraction of shale gas or oil. We suggest that any new or future onshore gas policy should address the following issues:

- Landscape and visual impacts, including cumulative and night-time assessment; and
- Ecological impacts, particularly groundwater dependent terrestrial ecosystems (GWDTE).

We have provided more detailed comment on the preferred policy approach in our MIR response.

Question 31: Minerals, including aggregates and coal

Do you think that the strategic environmental assessment of the alternative approach is appropriate?

If you think any changes should be made, what would they be?

<p>Do you have any other comments to make?</p> <p>The alternative approach includes a potential Area of Search for Coal Extraction south of the A6093. Without further detail on the extent of this Area of Search, our advice at present is that this may lead to impacts on carbon rich soils, peat and priority peatland habitats and may have landscape and visual impacts both during working and upon proposed restoration. On the basis of the information available at present, we agree with the conclusions made in the assessment.</p> <p>We have provided more detailed comment on the alternative policy approach in our MIR response.</p>
<p>Question 32: Waste</p> <p>Do you think that the strategic environmental assessment of the preferred approach is appropriate?</p> <p>If you think any changes should be made, what would they be?</p> <p>Do you have any other comments to make?</p>
<p>We have no comments to make on the assessment of the preferred approach.</p>
<p>Question 33: Waste</p> <p>Do you think that the strategic environmental assessment of the alternative approach is appropriate?</p> <p>If you think any changes should be made, what would they be?</p> <p>Do you have any other comments to make?</p>
<p>We have no comments to make on the assessment of the alternative approach.</p>
<p>Question 34: Mitigation</p> <p>Do you think that the proposed mitigation measures above are sufficient and appropriate?</p> <p>If you think any changes should be made, what would they be?</p> <p>Do you have any other comments to make?</p>
<p>The mitigation measures set out in this section of the interim ER include early Habitats Regulations Appraisal (HRA) screening of proposals and policies. We welcome this early, integrated approach to HRA and look forward to working with you to shape appropriate requirements as the Plan progresses.</p> <p>LDP strategy and policies along with project-level EIA and masterplans are appropriately identified as mitigation. However, we consider that design tools for making better places, as set out in paragraph 57 of SPP also play an important role in achieving the vision of East Lothian as “<i>an outstanding area in which to live, work and do business</i>”. A number of proposals in the MIR, if carried into the plan, are likely to be challenging to deliver. Therefore, an evidence based, structured approach to these sites, e.g. Blindwells and Cockenzie, will be required. In relation to our remit, we see the design-led approach set out in SPP as being integral to identifying and securing appropriate mitigation for landscape and natural heritage.</p> <p>We have provided more detailed comment on this issue in our MIR response.</p>
<p>Question 35: Monitoring</p> <p>Do you think that the proposed monitoring arrangements above are sufficient and appropriate?</p> <p>If you think any changes should be made, what would they be?</p>

<p>Do you have any other comments to make?</p> <p>The proposal to tie the parallel monitoring arrangements of the SEA and the LDP together is sensible and proportionate. In addition, we suggest that you consider opportunities for linking monitoring to the Development Management and Single Outcome Agreement processes as this could provide a clear, repeatable process by which to monitor the effects of the Plan.</p> <p>Rather than go through potential options in this response we would be happy to sit down together to discuss monitoring requirements and how this might draw on work already being carried out by your Development Management team.</p>
<p>Question 36: Limitations of the assessment</p> <p>Do you think that the above is an accurate description of the limitations of a SEA of a LDP?</p> <p>If you think any changes should be made, what would they be?</p> <p>Do you have any other comments to make?</p> <p>We generally agree with the description of the limitations of SEA of a LDP. However, we believe that the description of limitations does not go far enough in reference to paragraph 3.19 of Scottish Government's SEA Guidance and in relation to proposals at Cockenzie and Blindwells in particular.</p> <p>For the proposals at Cockenzie and Blindwells, uncertainties in part arise from a number of potential scenarios and external limitations. The SEA of the plan therefore represents an opportunity to clearly highlight to stakeholders what additional information is likely to be required and how proposals for these sites will be developed further in consultation.</p>
<p>Question 37: Site Assessments (Appendices 4-9)</p> <p>Do you have any comments to make on the detailed site assessments contained in Appendices 4-9? Please quote the relevant site reference number(s).</p> <p>General</p> <p>The site assessment process set out at the beginning of each Appendix is comprehensive and the resulting site assessment forms provide a clear description of the environmental assessment as well as the suitability and deliverability of sites. The inclusion of aerial photos alongside annotated site panoramas is a particularly useful addition. Overall, we commend the approach taken and suggest that these could be presented as good practice in site assessment.</p> <p>Sites</p> <p>We have provided detailed comments on natural heritage impacts and key natural heritage issues along with advice on allocations in our MIR response. We refer you to our MIR response but note here our support for the approach you have taken to the site assessments. Where we have not commented on a site, we have no further advice to offer at this stage.</p> <p>The site assessments provide an initial screening position for HRA. As noted in response to other Questions above, we look forward to advising you on the HRA and helping to shape any changes to the plan which arise through the HRA process.</p>
<p>Question 38: Other comments</p> <p>Finally, do you have any other comments to make on the interim Environmental Report or its Appendices that are not covered by the previous questions?</p>
<p>Appendix 1 – Other Relevant Plans, Policies and Strategies</p>

The following plans, policies and strategies are also relevant to the SEA:

- **Cycling Action Plan for Scotland (2013)** – a refresh of previous policy which maintains the vision of 10% of journeys by bike by 2020.
- **A Long-term Vision for Active Travel in Scotland 2030** – sets out a vision for walking and cycling as the most popular choice for shorter, everyday journeys. This includes a vision for development planning as focused on creating places based around active travel and which support local economies, incorporate green networks and encourage social interaction and activity.
- **Fitting Landscapes** – Scottish Government policy on landscape design and management in connection with transport infrastructure.
- **Green infrastructure: design and placemaking** – provides an overview of the policy context of green infrastructure and sets out design issues and techniques for integration into placemaking.

We understand that the subject matter of **Designing Places** has been brought into Scottish Government's **Creating Places** policy and is incorporated into SPP policy on placemaking (paragraphs 36 to 57). We therefore recommend that reference to Designing Places is removed from Appendix 1 and replaced by these policy documents.

Appendix 2 – SEA Assessment Framework Methodology

Biodiversity, Flora and Fauna includes a question on whether development sites are outwith an area designated for its international, national or local nature conservation interest. As discussed under Questions 1 and 3 above, in the case of international and national designated sites it is off-site impacts from land use change which are often a greater threat to protected areas than direct impacts. The question may be more relevant if re-framed around whether an allocation is likely to have a significant effect on sites designated for their nature conservation interest as this would cover both direct and indirect impacts.

As the second development site question appears to be specific to international designated sites we suggest it is reworded to tie in with Habitats Regulations Appraisal: *“Is the site’s development for the use proposed not likely to have an adverse impact on European site integrity?”*

Other Responses to the IER Consultation

Issue:	IER Question:
Current State of the Environment	Question 1
Total number of responses on issue	10
Sufficient information provided	4
Insufficient information provided	4
National interest groups <u>Coal Authority</u> supports reference to safeguarding of mineral resources and the identification that coal reserves exist in the area at shallow depth	
Landowners, developers and agents <u>Rick Finc Associates</u> believes there are some deficiencies in terms of sensitivity of certain features, e.g. consideration of sensitivity of different areas of green belt should be indicated for each cluster, similarly battlefields. Believes whole assessment should be revised. <u>Cardross Asset Management Group</u> believes the viability of major sites should be considered within the IER – particularly Blindwells. Existing open space designations should not preclude consideration of site for development.	
Community Councils and local interest groups <u>Cockenzie and Port Seton Community Council</u> would like to see a drive to make East Lothian carbon neutral.	
Members of the public <ul style="list-style-type: none"> • Should highlight that policy has allowed low-rise sprawl, limiting options for future development. • Map on p26 of landscape character areas indicates land to north of Garletons is coastal margin but Main Issues Report does not reflect this. • Lack of weighting to different issues; cumulative scores to not address this • Northerly winds are less significant than westerly winds and occasional easterly gales. • There should be more information on the impact of housing, agriculture and the economy on the environment, and more consideration of the value of the natural environment. • More emphasis needed on buildings in town and countryside, ancient monuments, listed buildings and conservation areas, which contribute to visual character. • A number of statistics are out of date. 	

Issue: Key Environmental Issues	IER Question: Question 2
Total number of responses on issue	10
Key issues correctly identified	8
Key issues incorrectly identified	1
<p>National interest groups</p> <p><u>National Trust for Scotland</u> welcomes the issues and hope that these are properly reflected in the local development plan.</p>	
<p>Landowners, developers and agents</p> <p><u>Rick Finc Associates</u> agrees with the issues identified. Development requirements cannot be delivered without impacts on greenfield and prime agricultural land; how and where to release land should be an over-riding consideration. The IER should identify less sensitive areas to guide future expansion.</p> <p><u>Cardross Asset Management Group</u> believes East Lothian cannot change its positions as a dormitory for Edinburgh and should build on this factor. Land at risk of flooding is capable of development with suitable mitigation.</p>	
<p>Members of the public</p> <ul style="list-style-type: none"> • Should be an attempt to address car use, including in relation to relationship to employment proposals and commuting. • Cultural heritage statement is weak and does not align with national policy. • Little reference to mental health in human health section. • Needs more emphasis on environmental impacts of development; impacts longer-lasting than economy and harder to resolve. • Key issues are landscape/countryside/agriculture and arboriculture (lack of joined-up thinking on qualities of whole county and economic importance of open countryside) and environmental qualities of towns and villages (little public awareness of their beauty; taken together they are a wasted asset). 	

Issue: Evolution of the Baseline	IER Question: Question 3
Total number of responses on issue	7
Sufficient information provided	4
Insufficient information provided	2
<p>Landowners, developers and agents</p> <p><u>Rick Finc Associates</u> considers this scenario is unrealistic as the LDP is a regulatory requirement.</p>	
<p>Members of the public</p> <ul style="list-style-type: none"> • Clarity is needed and designations should be more definitive, e.g. green belt means no development, loss of prime arable land has greater weight than cumulative score, flood risk must be taken seriously, mitigation must be real, transport constraints much be properly recognised. • More emphasis should be placed on protecting biodiversity. No detail on how this will be done. Value of individual sites diminished when they are not connected. • Baseline is 'planning orientated' failing to take account of complexity of environment and people's aspirations. • Prime agricultural land is of little value to biodiversity so its development will potentially increase biodiversity. 	

Issue: Draft Aims and Objectives	IER Question: Question 4
Total number of responses on issue	8
Assessment appropriate	5
Assessment inappropriate	1
<p>Landowners, developers and agents</p> <p><u>Rick Finc Associates</u> believes it is not appropriate to provide a score or ranking for aims and objectives as they are not policies, strategies or plans.</p> <p><u>Scott Hobbs Planning on behalf of Ashfield Land</u> notes it has made comments on the LDP aims and objectives in its MIR response.</p>	
<p>Members of the public</p> <ul style="list-style-type: none"> • It should be more than the significant and designated areas of biodiversity than are protected. It is always 'appropriate' to conserve and enhance biodiversity. Small and seemingly insignificant areas of unused ground as just as valuable for biodiversity as some internationally designated areas; this should be taken account of and appropriate areas retained or enhanced. • 'Where appropriate' in respect of listed buildings and conservation areas seems like a 'get-out' clause. Strict rules from government policy should not be watered down. 	

Issue:	IER Question:
Sustainability & Climate Change	Question 5
Total number of responses on issue	8
Assessment appropriate	6
Assessment inappropriate	0
Landowners, developers and agents	
<p><u>Rick Finc Associates</u> believes sustainable development could be more successful if it takes the form of organic growth of settlements, not large greenfield or brownfield allocations. Climate change adaptation may only be achievable when facilitated through development and contributions. Compact strategy may limit ability of towns elsewhere to adapt to climate change. A comparative assessment of compact and dispersed scenarios should be made in respect of sustainability and climate change. The IER assessment should be revised.</p>	
Members of the public	
<ul style="list-style-type: none"> • ‘Lip-service’ to sustainability must be avoided, e.g. transport. The North Berwick line is at capacity; unless there is real prospect of increasing capacity it should not be used in support of an area being referred to as accessible. • Buildings can be built in flood risk areas, as in the Netherlands. • Land west of Dunbar is prime agricultural land; once destroyed will never be available for use again. Loss of Thistly Cross fruit farm would also be harmful in terms of local food production. 	

Issue: Development Locations	IER Questions: Questions 6/7
Total number of responses on <u>preferred approach</u>	10
Assessment appropriate	5
Assessment inappropriate	4
Total number of responses on <u>alternative approach</u>	11
Assessment appropriate	3
Assessment inappropriate	5
<p>Landowners, developers and agents</p> <p><u>Rick Finc Associates</u> does not believe assessment has been undertaken in transparent and considered way. In relation to human health, a dispersed strategy would benefit more existing residents as benefits in terms of open space, recreation facilities, green networks, would be spread more widely. Determining metric seems to be CO₂ emissions. SPACE tool has been used but has only considered locational aspects of housing sites and failed to consider potential benefits of dispersed scenario. Assessment has focused only on positive impacts of compact strategy. Benefits of dispersed strategy on biodiversity, population and material assets could easily be more positive as they would cover a wider area and more of the population.</p> <p><u>Scott Hobbs Planning on behalf of Ashfield Land</u> supports preferred approach and believes assessment demonstrates its environmental acceptability. Notes relative numbers of very positive and very negative scores, and that both strategies score negatively for landscape.</p> <p><u>Cardross Asset Management Ltd</u> believes the Council needs to clarify that the Special Protection Area does not constrain the delivery of LDP objectives; uncertainty could prejudice delivery, particularly up to 2019.</p>	
<p>Community Councils and local interest groups</p> <p><u>Cockenzie and Port Seton Community Council</u> supports a dispersed growth strategy and feels this will minimise development on green belt land, lessen local traffic congestion and air pollution and reduce likelihood of coalescence. In favour of Blindwells.</p>	
<p>Members of the public</p> <ul style="list-style-type: none"> • Preferred sites have been well considered and will benefit local community. Alternative sites would not benefit local community. A number of these should be ruled out altogether. • Choice between compact and dispersed is false. Council clearly prefers compact so that is what will happen. No need for one or other; correct approach is large and small scale development in appropriate locations for each. This should not be outweighed by provision of infrastructure argument. Scoring system only takes us so far; each site should be scored. • There are enough new houses in current development in the East. Take-up of employment in Dunbar has been minimal and this is unlikely to change, so many new residents are likely to commute to Edinburgh. Rail would only be feasible if train services improved. Commuters would drive to the station and cause parking problems. • Flood risk areas should not be considered 'no go' for development, for example Haddington town centre east of the Tyne, which could be made available for business and car parking. 	

Does not agree overall effect of alternative approach would be neutral on heritage; this should be negative.

- Impact on soil and landscape should not be the same for each option; dispersed option would be bound to use more prime agricultural land and impact on areas that rely on landscape for tourism.
- Not possible to mitigate impacts of development in some areas.
- Ratings inconsistent and not explained. Some statements appear incorrect, e.g. population and health.

Issue: Town Centres	IER Questions: Questions 8/9
Total number of responses on <u>preferred approach</u>	8
Assessment appropriate	4
Assessment inappropriate	2
Total number of responses on <u>alternative approach</u>	8
Assessment appropriate	5
Assessment inappropriate	1
<p>Landowners, developers and agents</p> <p><u>Rick Finc Associates</u> does not believe assessment has been undertaken in transparent and considered way. New town centre at Blindwells will have negative effects on existing centres, which have not been taken into account. Socio-economic implications have not been considered, nor has the Town Centre First Approach.</p> <p><u>Cardross Asset Management Ltd</u> believes the predication of a new town centre at Blindwells is premature as delivery is uncertain with the Plan period.</p>	
<p>Community Councils and local interest groups</p> <p><u>Cockenzie and Port Seton Community Council</u> believes new developments should be in character with surroundings. Old buildings should be preserved and reused rather than replaced. Does not support development of retail parks as these are out of character with East Lothian. Blindwells town centre should support only the new town, otherwise it would create traffic congestion problems.</p>	
<p>Members of the public</p> <ul style="list-style-type: none"> • Does the increased carbon emissions from the dispersed approach take account of the North Berwick line operating at capacity and hence traffic will mainly go by road? What about increased emissions from congestion on Salter’s Road and Musselburgh? • Concerned at negative effects on heritage but encouraged that specialist studies might be required [in mitigation]. These should be made of all assets in all areas and a comprehensive view taken. 	

Issue:	IER Questions:
Planning for Employment	Questions 10/11
Total number of responses on <u>preferred approach</u>	7
Assessment appropriate	1
Assessment inappropriate	4
Total number of responses on <u>alternative approach</u>	7
Assessment appropriate	4
Assessment inappropriate	1
Landowners, developers and agents	
<p><u>Rick Finc Associates</u> believes the preferred approach is unrealistic and is too dependent on larger sites, e.g. Cockenzie and Blindwells. The SEA should consider the implications of these sites not being realised within the Plan period. Small mixed-use areas are more sustainable socially and environmentally but the IER does not reflect this.</p> <p><u>Cardross Asset Management Ltd</u> believes there are acute shortages of housing land so existing employment sites should not be safeguarded without considering their potential for alternatives uses, including housing.</p>	
Community Councils and local interest groups	
<p><u>Cockenzie and Port Seton Community Council</u> believes strategic sites should be retained and non-strategic sites opened to mixed use. Council needs to find a specific business 'niche' for East Lothian and support this through designated strategic employment areas.</p>	
Members of the public	
<ul style="list-style-type: none"> • There are vacant premises all over East Lothian. Employment is not created by designating more sites, rather housing should be located near existing sites to increase likelihood of occupation. Proposal at Westpans is nonsensical. • Doesn't understand strategy of resisting mixed use nor of retaining lots of employment land when the vast majority will be in other parts of city region anyway. • Specialist studies of heritage should be made of all assets in all areas and a comprehensive view taken. 	

Issue: Planning for Housing	IER Questions: Questions 12/13
Total number of responses on <u>preferred approach</u>	9
Assessment appropriate	6
Assessment inappropriate	2
Total number of responses on <u>alternative approach</u>	8
Assessment appropriate	5
Assessment inappropriate	2
<p>Landowners, developers and agents</p> <p><u>Scott Hobbs Planning on behalf of Ashfield Land</u> believes preferred approach is significantly less environmentally damaging in terms of housing allocations, as demonstrated by the assessment. Believes assessment of landscape should be neutral due to benefits associated with potential mitigation.</p> <p><u>Rick Finc Associates</u> believes environmental benefits of dispersed strategy could easily be more positive than those of compact as will cover a wider area and reach more of the population. The assessment should take a more realistic view and assume Blindwells is not currently effective. Supports alternative approach as this be more sustainable, allowing smaller pockets of development to complete settlement boundaries, e.g. Dolphingstone Farm (Prestonpans).</p> <p><u>Cardross Asset Management Ltd</u> believes clarity on the constraints of the Special Protection Area needs to be resolved immediately as that could jeopardise delivery.</p>	
<p>Community Councils and local interest groups</p> <p><u>Cockenzie and Port Seton Community Council</u> would prefer if green belt land was not used for housing developments.</p>	
<p>Members of the public</p> <ul style="list-style-type: none"> • Commends sites selected as preferred as they will enhance local area and provide vibrant and attractive place to live; believes alternatives are correct in the main and some are not suitable for development. In particular ALT-T6/7 (East Tranent); Blindwells should be the preference over these. Comments relating to East Tranent are well considered and not proposing the site is the correct decision. • Approach is generally good but lack of hierarchy of issues (e.g. is prime agricultural land more or less important than accessibility to sustainable transport) and some concepts can be 'stretched' in favour of particular sites, e.g. Goshen in terms of relationship to settlements, and flooding. • If other councils are taking a short-term view there may be a risk that in future East Lothian gets more than its fair share. The alternative approach would be short-sighted and negligent. • There will be a negative effect on both heritage and landscape (preferred approach). More thought should be given to alternatives; there may be others not covered in the MIR. 	

Issue: Green Belt	IER Questions: Questions 14/15
Total number of responses on <u>preferred approach</u>	10
Assessment appropriate	6
Assessment inappropriate	3
Total number of responses on <u>alternative approach</u>	9
Assessment appropriate	3
Assessment inappropriate	5
<p>Landowners, developers and agents</p> <p><u>Scott Hobbs Planning on behalf of Ashfield Land</u> supports the preferred approach and notes positive effects predicted. Its Green Belt study demonstrates release of Goshen from green belt meets objectives of SESplan policy 12. Notes negative effects of alternative approach.</p> <p><u>Rick Finc Associates</u> agrees with preferred approach and assessment of it.</p>	
<p>Community Councils and local interest groups</p> <p><u>Cockenzie and Port Seton Community Council</u> would prefer green belt areas were not moved around; the policy exists to protect natural spaces and modifying the boundaries defeats this. Supports reasonable alternative.</p>	
<p>Members of the public</p> <ul style="list-style-type: none"> • The preferred approach requires wholesale destruction of the green belt; nothing can mitigate that. • The impact of building on the green belt will have considerable impact on biodiversity and environment in general. A good quality green network should be created to create good quality habitat in other areas in lieu of lost land. • Agrees with preferred strategy but worried about coalescence; the west is just as valuable as other areas. • The alternative may not be 'reasonable' given the demands being made. • The introduction of a green belt would be nice (Dunbar resident). • Green belt should be sacrosanct. 	

Issue:	IER Questions:
Countryside Around Towns	Questions 16/17
Total number of responses on <u>preferred approach</u>	10
Assessment appropriate	4
Assessment inappropriate	4
Total number of responses on <u>alternative approach</u>	6
Assessment appropriate	2
Assessment inappropriate	2
Landowners, developers and agents	
<p><u>Rick Finc Associates</u> believes this additional level of protection is unlikely to have any additional benefits. Benefits would only be achievable through introduction of development and contributions to green network etc., therefore the benefits identified for biodiversity and landscape should be attributed to the alternative approach rather than the preferred.</p> <p><u>Cardross Asset Management Ltd</u> believes the entire policy is too prescriptive; there should be an objective assessment rather than a blanket policy.</p> <p><u>Developer/landowner (anon x 2)</u> believes land should not be designated with Countryside Around Towns status if it already has Conservation Area status.</p>	
Community Councils and local interest groups	
<p><u>Cockenzie and Port Seton Community Council</u> supports the policy as it will help prevent coalescence, in particular between Port Seton and Blindwells.</p>	
Members of the public	
<ul style="list-style-type: none"> • If the green belt is not protected given demands for housing why would this protection make a difference. DC1 ensures an assessment is made in any case. CAT would seem to leave DC1 irrelevant and fine to ignore. • Land should not be designated with Countryside Around Towns status if it already has Conservation Area status. • Agrees with concept but so much land, e.g. around Haddington, has been eaten by development it will be hard to implement. CAT policy must be pursued at all costs. There would not be a negative effect on heritage if these areas were properly studied so designations can survive pressure for housing. • Countryside around towns should be maintained where possible and green belt/farming areas should not be lost as they provide softening to approach to many towns. • More effort should be made to find brownfield sites. On sites ruled out by ground contamination efforts should be made to clean them up. Local government panders too much to developers. There is no justification for the scale of the alternative approach to housing in Dunbar. 	

Issue:	IER Questions:
Central Scotland Green Network	Questions 18/19
Total number of responses on <u>preferred approach</u>	6
Assessment appropriate	3
Assessment inappropriate	1
Total number of responses on <u>alternative approach</u>	5
Assessment appropriate	2
Assessment inappropriate	1
Landowners, developers and agents	
<p><u>Rick Finc Associates</u> believes benefits would only be achievable through development and contributions towards green network etc. Agrees there would be benefits with preferred approach but these would be largely concentrated in the west; the alternative approach will allow more wide-ranging benefits and reach more people. Therefore does not agree with assessment.</p> <p><u>Cardross Asset Management Ltd</u> believes the supplementary guidance should provide flexibility for developer of major opportunity sites, e.g. localised diversions of John Muir Way, use of existing open space for housing and economic development. It is too prescriptive without supplementary guidance.</p>	
Community Councils and local interest groups	
<p><u>Cockenzie and Port Seton Community Council</u> would like to see gaps in woodland or tree and hedgerow lines replanted to aid passage for wildlife. Also supports a reforestation policy where trees are planted in suitable locations; this would have benefits for biodiversity and reduced CO₂ emissions. In favour of greater guidance and a strategy supporting safe and easy movement of people and wildlife.</p>	
Members of the public	
<ul style="list-style-type: none"> • Alternative approach seems good enough. • The Countryside Around Towns concept must be pursued at all costs; there would not be a negative effect on heritage if areas were properly studied so designations can survive pressure for housing. 	

Issue: Development in the Countryside & on the Coast	IER Questions: Questions 20/21
Total number of responses on <u>preferred approach</u>	6
Assessment appropriate	5
Assessment inappropriate	1
Total number of responses on <u>alternative approach</u>	5
Assessment appropriate	2
Assessment inappropriate	3
<p>Landowners, developers and agents</p> <p><u>Cardross Asset Management Ltd</u> believes the coast is where the main opportunity site lies at Cockenzie power station and there must be due consideration of the economic effects relative to environmental constraints. The [assessment of the] alternative approach is too prescriptive.</p>	
<p>Community Councils and local interest groups</p> <p><u>Cockenzie and Port Seton Community Council</u> would like to see rural areas protected from urbanisation. Old buildings should be refurbished and reused rather than demolished and redeveloped.</p>	
<p>Members of the public</p> <ul style="list-style-type: none"> • The environmental assessments are surely needed. They may throw up alternatives. • The alternative approach seems wide open to abuse and effects would be more negative than stated. 	

Issue: Cumulative Assessment of Spatial Strategy Approaches	IER Questions: Questions 22/23
Total number of responses on <u>preferred approach</u>	7
Assessment appropriate	4
Assessment inappropriate	2
Total number of responses on <u>alternative approach</u>	6
Assessment appropriate	2
Assessment inappropriate	3
<p>Landowners, developers and agents</p> <p><u>Scott Hobbs Planning on behalf of Ashfield Land</u> believes the preferred approach is plainly the most environmentally acceptable. Increase in CO₂ emissions associated with alternative strategy is in itself a justification for the preferred strategy.</p> <p><u>Rick Finc Associates</u> believes this is a good summary but does not agree with a number of the individual topic assessments. An assessment should be made on a cluster by cluster basis for both preferred and alternative strategy approaches.</p> <p><u>Cardross Asset Management Ltd</u> believes weighting should be given to the acute housing shortage in relation to environmental constraints. The effect of the Special Protection Area on policy delivery needs rapidly resolved.</p>	
<p>Members of the public</p> <ul style="list-style-type: none"> • Cumulative assessment is a reasonable starting point but must be followed by thorough assessment of sites before designation in Plan. • Supports compact growth. • It makes no sense that impacts on soil and landscape are the same between the two options. The dispersed option would be bound to use more prime agricultural land and impact landscape of areas reliant on it for tourism. • Following study of the whole there could be alternative approaches. 	

Issue: Developer Contributions	IER Questions: Questions 24/25
Total number of responses on <u>preferred approach</u>	5
Assessment appropriate	3
Assessment inappropriate	1
Total number of responses on <u>alternative approach</u>	4
Assessment appropriate	2
Assessment inappropriate	2
<p>Landowners, developers and agents</p> <p><u>Rick Finc Associates</u> believes it is possible to assess and compare the implications of the two scenarios, particularly on a cluster basis. An estimation of relative contributions that could be achieved for each scenario should be an important metric in the assessment.</p>	
<p>Members of the public</p> <ul style="list-style-type: none"> • Preferred approach should be favoured. 	

Issue: Affordable Housing	IER Questions: Questions 26/27
Total number of responses on <u>preferred approach</u>	6
Assessment appropriate	4
Assessment inappropriate	1
Total number of responses on <u>alternative approach</u>	5
Assessment appropriate	2
Assessment inappropriate	2
<p>Landowners, developers and agents</p> <p><u>Rick Finc Associates</u> believes the assessment of preferred approach is appropriate but the assessment of the alternative may be overestimated. The alternative approach would render some proposals unviable and would therefore impact on the volume of provision; such a positive benefit to population would not be achievable. No consideration has been given to the environmental implications of the provision of affordable homes in greenfield locations.</p> <p><u>Cardross Asset Management Ltd</u> believes a weighting of delivery of acutely needed housing needs to be put in place relative to environmental issues of affordable housing.</p>	
<p>Members of the public</p> <ul style="list-style-type: none"> It is essential that consideration be give to self-build houses. This has worked elsewhere. Should be allowed in certain areas where there is extreme housing pressure, probably the west. 	

Issue: Energy, including Renewable Energy	IER Questions: Questions 28/29
Total number of responses on <u>preferred approach</u>	6
Assessment appropriate	3
Assessment inappropriate	2
Total number of responses on <u>alternative approach</u>	4
Assessment appropriate	2
Assessment inappropriate	1
<p>Landowners, developers and agents</p> <p><u>Cardross Asset Management Ltd</u> believes Cockenzie is being demolished to will no longer be a gas fired power station. Grid connections for offshore can have adverse effects on port viability. If port not viable, no point in offshore renewables on site. District heating and combined heat and power often unviable in major opportunity sites. NPF3 out of date so irrelevant.</p>	
<p>Community Councils and local interest groups</p> <p><u>Cockenzie and Port Seton Community Council</u> supports development within boundary of existing power station footprint. Does not support development on open space and would like these areas to remain natural.</p>	
<p>Members of the public</p> <ul style="list-style-type: none"> • No justification for preferred approach and likely to be contrary to will of existing communities and incompatible with surrounding residential area. Little reference to port. Support policy in NPF3 that offshore renewables should share transmission infrastructure but this not demonstrated so far in terms of the Inch Cape site. Misleading/wrong to suggest development of port/industrial facility on scale proposed would have 'very positive effects for the population'. There is substantial opposition to proposal and many people living and working in the area are worried about impacts on environment, livelihood, lifestyle, economy and health, including mental health. • There will be harm to surroundings of power station unless industrial development contained within existing industrial area or power station. Further land needed should be from Firth of Forth in form of harbour and storage areas, a mini Leith Docks. 	

Issue: Minerals, including Aggregates & Coal	IER Questions: Questions 30/31
Total number of responses on <u>preferred approach</u>	5
Assessment appropriate	4
Assessment inappropriate	1
Total number of responses on <u>alternative approach</u>	4
Assessment appropriate	4
Assessment inappropriate	0
<p>National interest groups</p> <p><u>Coal Authority</u> considers the assessment of the alternative approach appropriate.</p>	
<p>Community Councils and local interest groups</p> <p><u>Cockenzie and Port Seton Community Council</u> agrees with the preferred approach as it does not support opencast mining, fracking or underground coal gasification in East Lothian.</p>	
<p>Members of the public</p> <ul style="list-style-type: none"> Assessment does not cover impacts of infrastructure related to some forms of extraction, specifically Underground Coal Gasification, which may be principally offshore; onshore impacts should be covered. 	

Issue: Waste	IER Questions: Questions 32/33
Total number of responses on <u>preferred approach</u>	4
Assessment appropriate	3
Assessment inappropriate	1
Total number of responses on <u>alternative approach</u>	3
Assessment appropriate	2
Assessment inappropriate	1
<p>Landowners, developers and agents</p> <p><u>Cardross Asset Management Ltd</u> believes Zero Waste Plan is in the early stages of delivery so until there is a comprehensive network of sites there merits full consideration of all major opportunity sites for waste use.</p>	
<p>Community Councils and local interest groups</p> <p><u>Cockenzie and Port Seton Community Council</u> supports the drive to reduce waste generated in East Lothian and ensure it is managed responsibly.</p>	

Issue: Mitigation	IER Question: Question 34
Total number of responses on issue	5
Assessment appropriate	2
Assessment inappropriate	2
<p>National interest groups</p> <p><u>National Trust for Scotland</u> believes application of mitigation must consider local and national implications. Measures identified are appropriate but will only be sufficient if applied in thorough and effective manner. Happy to comment on specific mitigation plans but its preferred approach is for development that has no or very minimal impact.</p>	
<p>Landowners, developers and agents</p> <p><u>Cardross Asset Management Ltd</u> believes the mitigation measures appear to be excessive and may stifle delivery.</p>	
<p>Members of the public</p> <ul style="list-style-type: none"> It is odd that there is loss of prime agricultural land but overall effect is neutral. In respect of carbon emissions it needs to be made clear whether calculations acknowledge that the North Berwick line is at capacity in rush hour. 	

Issue:	IER Question:
Monitoring	Question 35
Total number of responses on issue	3
Assessment appropriate	2
Assessment inappropriate	2
Landowners, developers and agents	
<u>Cardross Asset Management Ltd</u> states no statutory monitoring is required so why have it?	

Issue: Limitations of the Assessment	IER Question: Question 36
Total number of responses on issue	5
Assessment appropriate	3
Assessment inappropriate	2
<p>Landowners, developers and agents</p> <p><u>Cardross Asset Management Ltd</u> believes consideration needs to be given to the cost of assessments in terms of how much cumulative costs may prevent applications for delivery of policies if costs are excessive and timelines are unknown, particularly if judicial review takes place.</p>	
<p>Members of the public</p> <ul style="list-style-type: none"> • Cumulative scoring results in odd outcomes unless there is a hierarchy of importance. Conclusions in relation to certain sites are not consistent with the facts described in the IER, nor sometimes with each other. 	

Issue:	IER Question:
Site Assessments (Appendices 4-9)	Question 37
Total number of responses on issue	123 (including 102 standard letters) <i>See also summaries of Main Issues Report responses on cluster areas.</i>
National interest groups	
<p><u>Coal Authority</u> is pleased to note reference to Coal Mining Risk Assessments in ‘suitability and deliverability’ section.</p>	
Landowners, developers and agents	
<p><u>Scott Hobbs Planning on behalf of Ashfield Land</u> makes detailed comments on the Goshen site PM/MH/HSG037, essentially arguing a number of assessments are too negative:</p> <ul style="list-style-type: none"> • Aspect: site can provide dwellings with a range of aspects including south facing. • Suitability: acoustic assessment has demonstrated proximity of railway line does not raise noise issues. • Physical infrastructure: Transport Assessment has demonstrated this is acceptable. • Service infrastructure: commitment to provision of primary school, and to accommodating secondary school and/or making an appropriate contribution. • Deliverability/effectiveness: necessary infrastructure is or can be made available. • Material assets: the assessment is unjustified as the impact is outweighed by other factors: national policy, social and economic benefits, etc. • Cultural heritage: disputes assessment in relation to impacts on Pinkie battlefield and the setting of Drummohr House. Believes evidence indicates assessment of effects has been overstated. • Landscape: development would be acceptable in terms of impact on green belt and coalescence. <p><u>Derek Scott Planning on behalf of East Lothian Developments Ltd</u> comments on the site assessment for Dolphingstone. Proposed development [not yet constructed] on adjacent site should have been considered in the assessment. Believes several scores should be more positive: location, accessibility, biodiversity, landscape.</p> <p><u>Gladman Developments Ltd</u> provides comments on the site assessment for site PREF-T14 Lempockwells Road Pencaitland. Argues majority of scores should be more positive: exposure, aspect, fit with policy objectives, physical infrastructure, service infrastructure, deliverability/effectiveness, biodiversity, population, human health, soil, water, air, climatic factors, material assets, cultural heritage, landscape.</p> <p><u>Clarendon Planning and Development Ltd on behalf of Dr David Slight</u> compares site assessments for PM/TT/HSG052 Limeylands Road and PM/TT/HSG077 Tynemount Farm West.</p> <ul style="list-style-type: none"> • Inconsistency of scoring for ‘suitability’ and ‘human health’. • The scoring of PM/TT/HSG052 should have been done based on the reduced site boundary of a 2014 planning application [compared to that submitted via the pre-MIR ‘call for sites’]. Believes a number of scores should be more positive: accessibility; exposure; aspect. 	

Landowner / developer (anon x 2) makes a detailed comparison between scores for Castlemains Place, Dirleton (PM/NK/HSG048) and Foreshot Terrace (ref).

- Size of allocation: Foreshot Terrace is proposed for 21 units, Castlemains is proposed for 30/35; most villagers would prefer fewer units and this would be more in keeping with the scale of the village. Less good quality agricultural land would be lost from Foreshot Terrace.
- Location of sites: Both sites have one boundary that is not robust. Castlemains Place is much more prominent and visible.
- Containment and precedent for future development: Castlemains Place would set a precedent for further development, whereas Foreshot Terrace would be an infill site within a contained building line.
- Impact on Dirleton Conservation Area: Both sites are within the Conservation Area but Historic Scotland and Scottish Natural Heritage have raised concerns over Castlemains Place but not Foreshot Terrace. These views should carry significant weight.
- Assessment of data within MIR: The assessment of other criteria is similar for the two sites. Where there are differences it appears Foreshot Terrace would be less damaging to the Conservation Area. It is illogical to prefer the Castlemains Place site.
- Site access: The statement regarding uncertainty over access is not accurate and it should be afforded no weight; planning applications have demonstrated this.
- Collateral benefit: Protected trees adjacent to the Foreshot Terrace site are in poor condition but could be preserved and enhanced through development on the site.

Cardross Asset Management Ltd believes the SEPA flood risk map at Cockenzie Power Station is inaccurate and should not prevent redevelopment. The consent for gas fired power station is irrelevant. The proposed use should not be considered solely as employment; it could satisfy a range of uses including housing, port, potentially incoming offshore energy facilities. It is unreasonable to require enhancement to public highways. There are no constraints preventing development within Plan period; part of site could be developed by 2019. There is minimal class 1 land on the site. The site is a major opportunity and significant open space should not be maintained; site's full potential should be maximised. Battlefield can be enhanced, access provided.

Landowner at Broxburn believes the site assessment process has been carried out well but would like more explanation of how preferred/alternative/other sites were identified for MIR. PM/DR/HSG035 Broxburn Cottages – believes accessibility score has not taken account of walking route to Asda store and Pine Marten and hence site meets PAN75 test and should be scored amber. Site assessment compares favourably with preferred sites in Dunbar area.

Community Councils and local interest groups

Gullane Area Community Council comments on all assessed sites in Gullane, Aberlady, Drem and Fenton Barns, and on Ferrygate.

- PM/NK/HSG112 Gullane Fire Service College – accepts need to find alternative uses. Would prefer alternative educational use. Marine Hotel should be retained (or facades). Future use should be mix of private and affordable housing and small business space. If access were taken to E or W upgrades would be needed.
- PM/NK/HSG060 Saltcoats Gullane – 150 homes in conjunction with 100 at Fire Service College would be too many for village. Concerned at impact on primary school. Does not believe satisfactory access can be provided for 150 homes. Road E is narrow with poor access on to main road; using track across golf links would create problems. Secondary access near primary school may impact road safety near school or affect play park. Impact on various species mean site is not suitable. Precedent for further expansion southwards

due to lack of robust boundaries.

- PM/NK/HSG026b Fenton Gait East Gullane – believes site not suitable. Would set precedent for further expansion, which would harm landscape setting of village and affect Greywalls listed building and designed landscape. Impact on views underestimated. Road safety impacts. Biodiversity impacts (presence of roe deer and black kite).
- PM/NK/HSG026a Muirfield Gullane – strongly opposed for reasons set out in site assessment.
- PM/NK/OTH006 Morrin Builders yard Gullane – agrees reuse or restoration of existing buildings would be appropriate. Alternative redevelopment on site would be likely to change character and setting of village.
- PM/KN/HSG088 Fenton Gait South Gullane – relatively remote from services but if provision could be made for affordable family housing it could encourage families to remain. Would fit reasonably well into village without encroachment.
- Aberlady (general) – concerned about damage to rural character of Aberlady, an ever-growing village that cannot provide sufficient local employment and social infrastructure is unsustainable; risk of becoming dormitory. Conservation Area boundaries and countryside within them should remain. Recognition of need for change but development should be accompanied by associated social and environmental infrastructure. Concerned that waste water treatment facilities cannot support growth without pumping facilities, which might necessitate significant growth. Development should only be considered following assessment of traffic flows. Concerned about education capacity. 100 homes is too many.
- PM/NK/HSG116 West Aberlady – forms part of larger area of agricultural land and would need robust boundaries. Screening/design would need to have regard to Conservation Area and Gosford House garden and designed landscape. Concerned at direct road connection from site to A198 and The Mair, creating bypass with road safety issues character of Mair should be safeguarded. Site is unsuitable for development.
- PM/NK/HSG098 Elcho Terrace Aberlady – site may be suitable subject to appropriate access arrangements and boundary treatments.
- PM/NK/HSG039 Kirk Road Aberlady – site not suitable, concern at traffic impacts.
- PM/NK/HSG006 Bickerton Field Aberlady – site would damage Conservation Area, it is less well-placed for school, and would create road safety issues and congestion. Site not suitable.
- PM/NK/HSG048 Castlemains Place Dirleton – believes some development on either this site or site north of Foreshot Terrace would be reasonable. Some concerns but notes road will prevent encroachment southwards, compatible with housing to north, and impact on views of castle could be minimised with single or 1.5 storey buildings.
- PM/NK/HSG018 Foreshot Terrace Dirleton – concerned at precedent for further development, traffic and road safety impacts, impact on pink footed geese [believes latter issue is not mentioned in site assessment but this is addressed by screening in to HRA process].
- PM/NK/HSG046 Castle Park Dirleton – notes Historic Scotland objections but some residents believe site suitable for affordable homes.
- PM/NK/HSG047 E of Ware Rd Dirleton – highly visible, would not support.
- PM/NK/HSG049 S of Gylers Rd Dirleton – 50 units would be too large, highly visible site, would not support.
- PM/NK/HSG068 Speedwell Gardens Dirleton – mixed views, no comment.
- PM/NK/OTH009 Rathowan Dirleton – no comment.
- PM/NK/HSG085 Glebe Dirleton – concern at encroachment northwards, opposed to site.
- SDP/NK/HSG004 Ferrygate N Berwick – remains concerned as per previous refusals, objects to site.
- PM/NK/HSG114 & PM/NK/HSG016 Drem/Fenton Barns – concerned at prospect of

significant development. Remains opposed to development at Fenton Barns as per previous refusals. Considers long term larger scale development inappropriate, notes part of area is within SDA only because Drem has station; significant rail upgrades would be needed; road system inadequate; congestion on coast road; unbalance to social equilibrium, undermine tourism and agriculture.

Dirleton Village Association shares above views of Gullane Area Community Council with respect to sites in Dirleton, Drem/Fenton Barns, and Ferrygate.

Pencaitland Community Council objects to site PM/TT/HSG092 New Winton as site lies outside village envelope and is objected to by majority of residents. Site assessment contains number of errors: fails to recognise issue of speeding traffic; there is more than one septic tank in the village but the nearest one is subject to ongoing difficulties; the site is not logical in landscape terms due to lack of natural boundary; it would lead to pressure for further development.

Humbie, East and West Saltoun and Bolton Community Council understands sites PM/TT/HSG061 and PM/TT/HSG063 in Humbie have been withdrawn by the landowner; there is no support for developing these sites or redrawing the village boundary as may now be suggested.

Garvald & Morham Community Council notes site assessment for Garvald Glebe PM/HN/HSG020 is poor and concurs with analysis principally due to lack of access and site issues.

Coastal Regeneration Alliance comments on two sites adjacent to Cockenzie & Port Seton:

- PM/PP/OTH001 Cockenzie Power Station – a number of scores should be more negative: suitability for proposed use, fit with policy objectives, population, human health, cultural heritage, landscape.
- PM/PP/HSG097 – site is not suitable for development in any way as largest part of core site of Battle of Prestonpans. Cultural heritage should be scored more negatively. Site would lead to coalescence.

Members of the public

Musselburgh cluster (appendix 4)

- PM/MH/BUS009 Westpans – difficult to see why this is promoted for employment. Site does not relate well to small housing cluster opposite. If site is not physically suitable, why put it forward? Site slopes steeply, is often muddy, and has no obvious safe access. Landscape is not neutral.
- PM/MH/HSG037 Goshen – the descriptions look like they've been written by the developer.
 - Location: site is not well-related to Musselburgh.
 - Accessibility: buses and cars are only viable options due to lack of rail capacity. Would make more sense to allow further expansion of Wallyford.
 - Water: flooding issues ignored.
 - Deliverability: how can there still be questions over this site; it has been subject of a planning application for over 3 years. Water supply is insufficient for both Wallyford and Goshen.
 - Green belt [landscape]: When Wallyford expansion was approved the Council was clear it would robustly defend further incursions into green belt. There would be coalescence with Prestonpans.
 - Alternative: why not a reduced scale proposal in the western part of the site? This

would decrease the impact, save the majority of arable land, the setting of Drummohr House, and improved transport infrastructure may be able to cope with it.

Prestonpans cluster (appendix 5)

- PM/PP/OTH001 Cockenzie Power Station – the site is not suitable for such extensive development and the assessment is misleading and incorrect, specifically suitability, fit, population, health, cultural heritage, and landscape [presumably believes all scores should be more negative]. There is widespread opposition to the proposals. Council should engage further and not include in Plan pending this. The proposal is not being treated in appropriate manner.
- PM/PP/HSG097 – largest surviving part of the battlefield. Should not be considered for development or even assessed. Would also lead to coalescence.
- PM/PP/BUS006 – some small scale development may be appropriate as a mechanism for improvement of historic fabric.
- PM/PP/BUS003 – as above, some small scale well-designed development may be appropriate.
- PM/PP/HSG30 & PM/PP/BUS005 – the curtilage of Bankton House should not even be considered for development due to its historic importance.
- [102 standard letters also received, raising same points as Coastal Regeneration Alliance above]

Tranent cluster (appendix 6)

- The decision not to select ALT-T6/7 as preferred is correct due to impacts on landscape transport and education, and on Blindwells.
- PM/TT/HSG025 West Saltoun – objects to site, not part of West Saltoun but rather separate area known as Greenhead. Would not be well integrated into West Saltoun. Would result in personal transport use, lacks shelter, burn runs through site, unsuitable for housing, road safety, lack of capacity in septic tank.
- PM/TT/HSG025 West Saltoun – objects to site and refers to site assessment as setting out reasons for this.

North Berwick cluster (appendix 9)

- PM/NK/HSG094 Drem – soil and physical infrastructure should be scored more negatively.
- PM/NK/HSG108 Drem – soil and physical infrastructure should be scored more negatively.
- PM/NK/HSG016 Fenton Barns – has no sense of being a settlement, accessibility, physical infrastructure and soil should be scored more negatively. Site has been subject to previous unsuccessful applications and should continue to be resisted.
- PM/NK/HSG114 Drem Area of Search – accessibility and soil should be scored more negatively.
- PM/NK/HSG048 Castlemains Place Dirleton – against site: too many houses for size of village; highly visible from A198 and Dirleton Castle; impact on Conservation Area; concerns of Historic Scotland and Scottish Natural Heritage; precedent for further development; increased traffic and pollution
- PM/KN/HSG018 Foreshot Terrace Dirleton – preferable to Castlemains Place as contained within boundaries and would not set precedent for further development; smaller number of units more appropriate; lesser traffic impact; less visible; no concerns from Historic Scotland or Scottish Natural Heritage.

Issue:	IER Question:
Other Comments	Question 38
Total number of responses on issue	8
Landowners, developers and agents	
<p><u>G H Johnston Building Consultants Ltd</u> believes the Plan should recognise the potential of PM/NK/HSG068 Speedwell Gardens Dirleton and allow a small-scale proposal. Makes comments on site assessment – believes scores should be more positive for aspect, fit with policy objectives, service infrastructure, population, cultural heritage, landscape. Any proposed Countryside Around Towns designation should recognise Dirleton in same terms as adopted Local Plan.</p> <p><u>Rick Finc Associates</u> believes in general the environmental effects are broadly similar for compact and dispersed strategies. Alternative strategy has been assessed as having more negative effect on climate change given need to travel further. However, if dispersed strategy also focuses on providing infrastructure and services, in dispersed locations, then environmental impacts on climate change will not be significantly different.</p>	
Members of the public	
<ul style="list-style-type: none"> • PM/PP/HSG050 Longniddry South is only assessed as a standalone site, not as a possible part of Blindwells. It appears assessment would have been the same. Other sites along the A1 should have been assessed as national policy no longer gives preference to train over bus transport for passengers. This is a serious omission. • MIR is incredibly positive. Preferred sites would contribute to future development of east Lothian. Would be disappointed if these were replaced with alternative sites, in particular East Tranent. Report is well informed in relation to these sites and conclusions are correct. • Generally a thorough and well-handled process. Difficult to engage with but more a consequence of how difficult the task is. Urges reassessment of ‘compact’ vs. dispersed’ – could be a combination. Would be more equitable. • Consultation process confusing, does not encourage engagement and is intimidating. Status of IER sites not clear. Too much to read; more time needed. Could the Council engage with communities in meaningful way? 	

MIR responses

- Around half of the responses were made online and the rest were received by post or email and have been added to the Hub manually. In some cases this has led to difference in the way the information could be recorded, or the clarity of the response received. Care has been taken to ensure that all responses are recorded and views included within the summaries in an appropriate way;
- The high online response rate has helped to reduce the time and resource required to analyse the results;
- Online respondents consented to publish their response though could opt to withhold their name and many chose to do this;
- For responses not received online and inputted into the Hub manually, the default position adopted is not to publish the name as consent was not specifically given as per the online process (it will not be possible to avoid publishing names at the Proposed Plan stage);
- This means that individuals will not be able to search for their own response by name though they are nevertheless all included. For this reason, multiple responses (e.g. form letters/petitions) have been added only once but it has been noted in the relevant summaries how many submissions/signatures were received in total, and the names and addresses have been recorded for purposes of notification of the Proposed Plan where legible. The summary documents therefore reflect the actual number of responses received by issue/question, including form letters and petitions. However, this does mean that the overall number of responses will not be the same as the total number recorded on the Hub;
- Additionally, a very small number of users inputted details (e.g. type of respondent) incorrectly and these errors have not been altered on the Hub, but have been rectified in the summaries; it is not material to the quantitative information;
- Respondents online were given a structured questionnaire that reflected the MIR questions, and included a combination of yes/no or preferred/alternative 'check boxes', and some space for free 'text box' answers. This was to allow for the quantitative as well as qualitative reporting provided in the summaries;
- Unfortunately some responses that were received by post and email did not respond to the specific questions posed in the document or make clear whether a particular approach or site was supported or opposed. All responses have been included in the summaries, but where a position is implied rather than stated clearly or has not been stated at all this has not been included in the quantitative analysis;
- This means that the quantitative analysis has its limitations – if people expressed a view on an issue without specifying clearly whether they supported a particular approach or site, their response was not able to be recorded in the numerical analysis of those for and against particular proposals or sites;
- This means that the total number of people responding to an issue is generally greater than the combined totals supporting preferred/alternative/neither approach because some responses were only qualitative in nature and did not express a clear view;
- There is a degree of cross-over between some of the topics, for example Spatial Strategy and Housing or the Energy section (in relation to Cockerzie) and the Prestonpans cluster. The responses have generally been reported under the topic they indicated, but summaries should be read together for a complete picture of views expressed where such cross-overs exist;
- The summaries pull out the key messages but inevitably are condensing a large volume of comment into a short document;

- Full responses will be published online via the Hub as soon as possible and therefore will be available to Members as well as the general public and other interested parties;
- The full responses will be considered in the preparation of the Proposed Plan.

IER responses

- Overall, responses received on the IER were very low, although comments were received from all Consultation Authorities and these were generally very positive;
- It should be noted that a number of other respondents misunderstood that the IER consultation sought views in relation to the adequacy of the assessment, and did not seek views on the merits of strategy or policy approaches being assessed since this was a matter for the MIR itself; Consequently, the quantitative aspect should be treated with caution since a number of responses focused on the merits of the subject being assessed, not the assessment itself;
- A number of responses to the MIR also made comments on the IER, particularly the site assessments where respondents took issue with the content / scoring of the assessment;
- A number of specific responses to the IER were also received – e.g. in relation to site assessments - and these have been summarised separately as part of the relevant MIR submissions. The IER summaries should therefore be read together with the MIR summaries for a complete picture as duplication in reporting has generally been avoided;
- As the IER is reviewed for the preparation of the Proposed Plan, all relevant responses will be considered in the preparation of the associated Draft Environmental Report;
- SEA consultation authority comments on the IER are difficult to summarise given their scope and have a unique statutory basis – they should be read in full and in conjunction with the summaries of other IER responses.

Appendix 4

Communications: Actions Taken by Audience

This table details the individual activities designed to reach identified audiences, but there may be cross-over (e.g. local residents who also run businesses; engaged citizens who are members of a Community Council and / or other local interest group; statutory consultees who are residents etc) generating wider reach.

AUDIENCE	Statutory advert	Direct email	Direct mail (reports)	Press adverts (news pages)	Press releases	Display posters	Articles	Online: website incl video	Online: social media	Events/ workshop invite	Reports to council *
Statutory consultees	Y	Y	Y					Y		Y	
East Lothian residents	Y			Y	Y	Y	Living Homefront	Y	Y	Y	
Engaged citizens:											
- Area partnerships	Y	Y	-	-	-	-		Y	-	Y	-
- Citizens Panel	Y	Y	-	-	-	-		Y	-	Y	-
- Community Councils	Y	Y	Y	Y	-	Y		Y	-	Y	-
- Community planning partners	Y	Y	-	Y	-	-		Y	-	Y	-
- Tenants & Residents Panels	Y	Y	Y	Y	-	Y		Y	-	Y	-
- Parent councils	Y	Y	-	Y	-	Y		Y	-	Y	-
- Community groups	Y	Y	-	-	-	-		Y	-	Y	-
Elected members	Y	Y	Y					Y			Y
Businesses	Y	Y					Business Buzz	Y			
Developers and land agents	Y	Y						Y		Y	
Local press	Y		Y	Y	Y			Y	Y		Y
Council staff		Y				Y		Y		Y	Y
		e-news						intranet			
MSPs	Y	Y						Y		Y	
Other agencies	Y	Y	Y					Y		Y	Y

* Council meetings are held in public and a public minute is published to the council's website

Distribution of Statutory Advert/Events Information

- A4 posters listing event dates sent to schools, community and sports centre, council offices, libraries,
- Email to statutory consultees using list provided by Planning; information posted where email address not provided;
- Information emailed or posted to Community Councils as per the updated mailing list;
- Email to 1,344 businesses in East Lothian – through Economic Development;
- Email to 2,000 contacts on Citizens Panel - through Policy & Partnerships;
- Email to 45 Community Planning Partnerships contacts – through Policy & Partnerships;
- Email with information to around 180 Area Partnerships contacts – through Policy & Partnerships;
- Information and email to East Lothian Tenants and Residents Panel sent on to the county's network of active Tenants and Residents Groups.

Media Activities

Editors' briefing:

- *23 October 2014 – background and context to MIR*
- *19 February 2015 – information from events, number of responses and next stages*

Press releases/information issued:

- 29 October 2014 – issued to tie-in with Council approval
- 12 November 2014 – issued to tie-in with start of consultation period
- 18 November 2014 – update on Musselburgh event
- 26 November 2014 – update on Prestonpans event
- 09 December 2014 – Cockenzie Energy Park (including info on dedicated web page)
- 07 January 2015 – update on events and encouraging engagement in closing stages
- 26 January 2015 – clarification on MIR and fracking from Cabinet Member for Environment; encouraging engagement in closing stages

Event materials/exhibitions

- A4 posters developed by planning and designed by ELC Graphics. Around 200 were printed and distributed to community and sports centres, council offices, schools and libraries. The posters were also available to download from the website for community distribution;
- Large format posters were designed for use at the series of events. These were combined with the overall strategy information, plans and area specific information. They were concise and written in jargon-free language to help residents to understand the key issues for the county and for their individual area;
- Planning also sourced venues for permanent display of materials during the consultation period in each of the main cluster towns. Additional A1 posters were produced and sent to these;
- 150 A4/A3 resizeable posters were printed to encourage engagement in the consultation process after the events period has closed. These were sent to all schools, council offices, community centres and community councils, libraries and facilities not in an area receiving A1 poster information.

Articles written and provided to:

- *Living Magazine*: Special 4 page supplement sent to 47,000 households throughout East Lothian, delivered by Royal Mail;
- *Business Buzz*: 2,300 copies – East Lothian Council’s economic development newsletter;
- *Homefront*: 9,000 copies - East Lothian Council tenants’ newsletter sent to tenants, partners and public outlets and also available online;
- *Panel News*: 2,000 copies - East Lothian Tenants and Residents Panel’s newsletter;
- ELTRP Website www.eltrp.co.uk .

Meetings

- The Main Issues Report was discussed at a number of events within the community with information supplied to the groups in advance for informed consideration. These included Community Council meetings, individual tenants groups, main ELTRP meeting (coinciding with the groups’ Burns Supper), Community Planning Partnerships and Area Partnerships and the Musselburgh Grammar Parent Council Meeting. The timings of the consultations gave the groups opportunity to attend the main MIR events or take the information and points of interest back to their own organisations, discuss the implications and submit a response before the 12-week consultation closed.

Advertising

- Statutory advert appeared in East Lothian Courier and East Lothian News;
- East Lothian Courier (news page position, series run 14 Nov -5 Dec);
- East Lothian News (news page position, series run 14 Nov - 5 Dec);
- East Lothian Courier website front page banner ad position linked to www.eastlothian.gov.uk/mir (up to 15,000 page views).

Online activities

- Dedicated area on East Lothian Council website created including a video explaining the need for an LDP/MIR and a brief overview of the proposals and challenges;
- All documents available to download online as well as the opportunity to order printed copies;
- East Lothian Council website: quick-link addresses set-up to make accessing online information and directing people to the website easier. Addresses were [eastlothian.gov.uk /LDP](http://eastlothian.gov.uk/LDP), eastlothian.gov.uk/MIR and eastlothian.gov.uk/cockenziepower;
- East Lothian Council Twitter account was used to issue tweets and regular updates. Independent analysis from Twitter Analytics showed that the three tweets that achieved the highest engagement rates were: Cockenzie Power Station Site FAQs (4.9%), Environmental Impact Assessment on Cockenzie Power site (4%) and the commencement of the consultation period (2%). In total, 11,007 twitter accounts viewed the 10 tweets sent from the Council’s account tweets regarding the Main Issues Report and its associated issues;
- Updates/ reminders posted to East Lothian Council Facebook account;
- Article written for ELTRP website.
- Contact made online directly with community groups likely to have an interest/ provide a gateway to the wider community (i.e., @lothianloop, @listentolongniddy).

Staff briefing and updates

- Articles written for the Council's e-News for staff – general information and context plus individual event reminders;
- Presentations given to Council Management Team and Senior Management Team;
- Articles posted to EInet, the Council's staff intranet;
- Information sent to elected members;
- Briefing prepared for frontline staff in Contact Centre, Council offices and libraries to ensure enquiries were handled appropriately with relevant information supplied;
- Briefing supplied to elected members' Personal Assistants with information on council officials to contact and how available materials could be obtained;
- Information supplied for Chief Executive East Coast FM appearances during consultation period and as a round-up afterwards.

Press advert (news pages)

- 14x3 columns size; booked for four week run starting 13 November 2014 on news page position in both East Lothian News and East Lothian Courier.

planning the future development of
east lothian

homes business transport schools environment heritage

To help shape East Lothian's future planning come to an
LDP Main Issues Report
consultation event near you

Informal drop-in sessions from 2.00-5.30pm
Free 2 hour workshops from 6.30-8.30pm*

Musselburgh, Brunton Hall	Mon 17 Nov
Prestonpans, Community Centre	Thur 20 Nov
Haddington, Town House	Tues 25 Nov
Dunbar, Castle Social Club	Tues 2 Dec
North Berwick, Community Centre	Thurs 4 Dec
Tranent, Fraser Centre	Mon 8th Dec

*please register to guarantee your place

Visit
eastlothian.gov.uk/ldp
to find out more, register for
a workshop, or share your views.

East Lothian Council
01620 827827








Appendix 6

Eventbrite Workshop Attendance Report

MyEvents.csv [Read-Only] - Microsoft Excel

Event	Date	Status	Tickets Sold	Tickets Available
Main Issues Report consultation event: Musselburgh	17/11/2014 18:30	Past	29	31
Main Issues Report consultation event: Prestonpans	20/11/2014 18:30	Past	37	23
Main Issues Report consultation event: Haddington	25/11/2014 18:30	Past	14	46
Main Issues Report consultation event: Dunbar	02/12/2014 18:30	Past	15	45
Main Issues Report consultation event: North Berwick	04/12/2014 18:30	Past	53	7
Main Issues Report consultation event: Tranent	08/12/2014 18:30	Past	23	37
			171	189

Ready | MyEvents | 100% | 12:06 16/03/2015

	East Lothian Council @ELCouncil · Nov 13 12-week consultation on future development in East Lothian, the Main Issues Report, will start 17 Nov. For more info: bit.ly/1Bfa25q	Impressions (Seen by) 1,780	Engagement (Clicks) 36	Engagement rate % 2.0%
	East Lothian Council @ELCouncil · Nov 18 East Lothian Council's Main Issues Report consultation events started yesterday in Musselburgh. Read more here: bit.ly/1uLdcZR	Impressions (Seen by) 1,142	Engagement (Clicks) 20	Engagement rate % 1.8%
	East Lothian Council @ELCouncil · Nov 18 Main Issues Report consultation event at Prestonpans Community Centre on 20 November 2014. Find out more and register eastlothian.gov.uk/mir View Tweet details	Impressions (Seen by) 328	Engagement (Clicks) 5	Engagement rate % 1.5%
	East Lothian Council @ELCouncil · Nov 24 Interested in #housing #education & #employment in #Haddington area? Come to our Main Issues Report event 25/11. Info eastlothian.gov.uk/mir View Tweet details	Impressions (Seen by) 1,277	Engagement (Clicks) 10	Engagement rate % 0.8%
	East Lothian Council @ELCouncil · Dec 1 Planning the future development of East Lothian: Main Issues Report event in Dunbar on Tues 2nd Dec. Find out more at eastlothian.gov.uk/ldp View Tweet details	Impressions (Seen by) 1,352	Engagement (Clicks) 23	Engagement rate % 1.7%
	East Lothian Council @ELCouncil · Dec 11 We have published FAQs on the former Cockenzie Power station site so that interested parties are kept informed: bit.ly/1Dh8Mjg View Tweet details	Impressions (seen by) 1,192	Engagements (clicks) 59	Engagement rate % 4.9%
	East Lothian Council @ELCouncil · Dec 15 The EIA for the potential Marine Energy Park on the former Cockenzie Power Station site has been issued: bit.ly/1GHb7jN View Tweet details	Impressions (Clicks) 752	Engagement (Clicks) 30	Engagement rate % 4.0%



Versions of this document can be supplied in Braille, large print, on audiotape or in your own language. Please phone Customer Services on 01620 827199.

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