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To be read in conjunction with Report to East Lothian Council dated 29/05/18 titled East Lothian Local Development Plan 2018

Authorised By	Douglas Proudfoot
Designation	Head of Development
Date	17/05/18

For Office Use Only:	
Library Reference	75/18
Date Received	17/05/18
Bulletin	May 2018



local development plan ²⁰¹⁸

STRATEGIC ENVIRONMENTAL ASSESSMENT
POST ADOPTION STATEMENT

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LDP SEA POST ADOPTION STATEMENT

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Table of Abbreviations

DPEA	Department of Planning and Environmental Appeals	SEA	Strategic Environmental Assessment
ER	Environment Report	SEA Act	Strategic Environmental Assessment (Scotland) Act 2005
		SEPA	Scottish Environment Protection Agency
HES	Historic Environment Scotland	SESPlan	Strategic Development Plan for South East Scotland (number)
LDP	Local Development Plan	SNH	Scottish Natural Heritage
MIR	Main Issues Report	SPA	Special Protection Area

Introduction

Purpose of this Statement

1. The East Lothian Local Development Plan (LDP) was adopted on xx xxxx. Section 3.18 of the Strategic Environmental Assessment (Scotland) Act 2005 (the “SEA Act”) requires a statement to be published post adoption. The statement must set out how the findings of the Environment Report have been taken into account in preparation of the plan. It must include how any consultation responses have been taken into account. This document is that statement.

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Key facts

2. The key facts relating to this plan are as follows:

Responsible Authority	East Lothian Council
Title of Plan, Policy or Strategy (PPS)	East Lothian Local Development Plan
What prompted the PPS	The Town and Country Planning (Scotland) Act 1997 (as amended) requires the Council to prepare a development plan for its area
Subject	Land use planning
Period covered	10 years from adoption
Frequency of updates	Every 5 years
Area covered	East Lothian Council area (see Figure 1 below)
Purpose	<p>The plan:</p> <ul style="list-style-type: none"> • provides a framework against which development proposals can be prepared and assessed • shows where and how the Strategic Development Plans requirements can be delivered in East Lothian • contains site specific proposals where the Council wants to stimulate development • contains policies the Council will use to manage development
Contact	Iain McFarlane, Planning Service Manager, John Muir House, Haddington, EH41 3LH
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Area Covered by Plan

3. The area covered by the plan is the administrative area of East Lothian, an area of around 100,000 population in the south-east of Scotland.

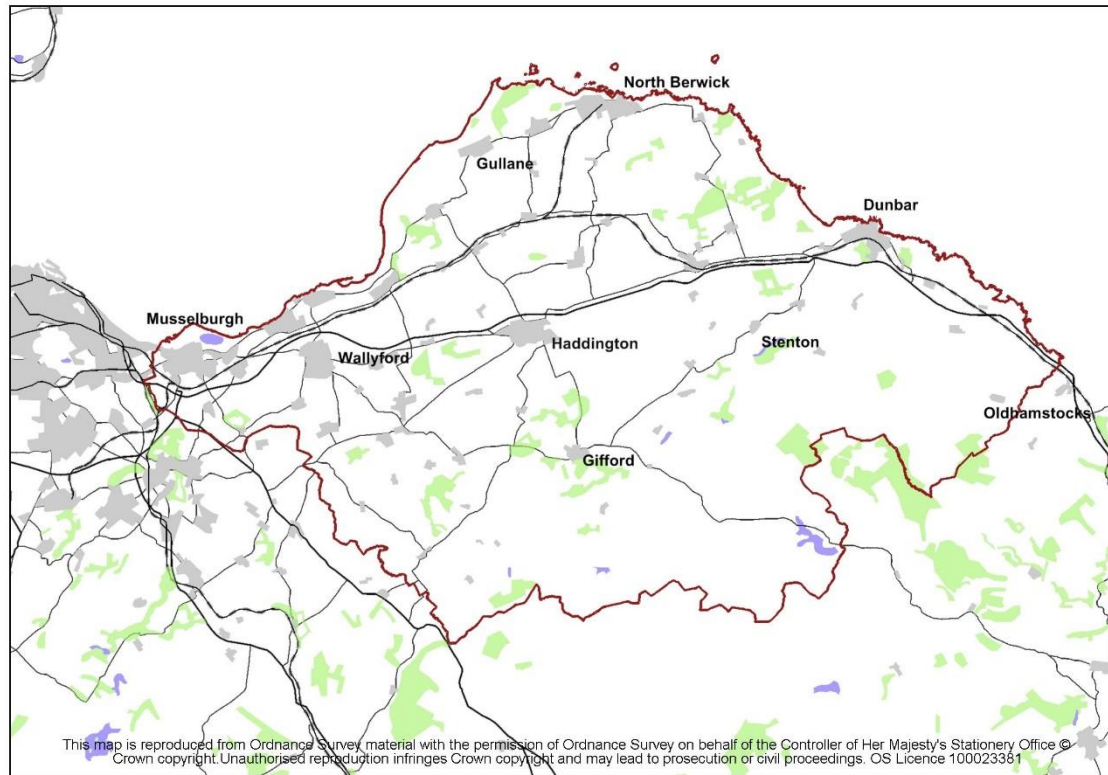


Figure 1 East Lothian area

Strategic Environmental Assessment (SEA) activities – brief summary of action to date

4. SEA has been carried out alongside the LDP, informing it at all key stages. Under the SEA Act, Consultation Authorities must be involved in the process of preparing the SEA. The Consultation Authorities are Historic Environment Scotland (HES), the Scottish Environment Protection Agency (SEPA) and Scottish Natural Heritage (SNH). Publication of the Main Issues Report (MIR) is the first formal stage in preparation of the LDP. Before this, the Council discussed with the Consultation Authorities how the SEA should be carried out, and what issues it should cover, in a process known as ‘Scoping’. The comments of the Consultation Authorities at this early stage were used to develop the approach to SEA. The Council thanks the SEA Gateway and Consultation Authorities for their continued support and advice throughout the process. Before the MIR was published, the Council asked Planning Aid Scotland to run a series of workshops on which planning issues the MIR should cover. These workshops included information on the SEA process. The Council also produced a discussion paper at this time. Planning Advice Scotland also advised the Council on how to communicate with and engage communities, which the Council took on board at the MIR stage.
5. Before the MIR was published, the Council asked developers and owners of land, or any other interested parties, to put forward sites for allocation in the LDP in a ‘Call for sites’. The Council itself put forward some sites it considered to be potentially suitable for development. The Council selected some of these sites for inclusion in the MIR as part of its Preferred Approach while others were put forward as part of its Reasonable Alternative to it. Some ‘Other’ options were also included. Preferred and alternative approaches to policy issues were also set out. Environmental assessment of both approaches and options was carried out, and published alongside the MIR as the “Interim Environmental Report (ER)”. All of the sites put forwards were subject of a Site Assessment. These were published as Appendices 4 – 9 to the main report, due to the volume of material¹. The Interim ER was therefore made available to support public understanding of the likely significant environmental effect of different options within the MIR.

¹ Available by following links here: http://www.eastlothian.gov.uk/info/204/local_development_plan/1470/local_development_plan_main_issues_report_mir/4)

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6. A Communications Strategy was drawn up to help publicise the MIR and the Interim ER. This led to publicity in the local press; inserts into the Council's newsletter which is sent to most East Lothian households; radio items; articles for specific publications; and use of social media. The Council also consulted community councils and community planning partners, stakeholder networks; Consultation Authorities and others. The planning team produced a short video explaining the MIR and Interim ER process, and how to respond to the consultation.
7. Consultation Responses to the Interim ER were reported to Council via the Members Library Service². Just over 1000 responses were submitted in response to the MIR. Overall, the number of responses to the Interim ER were very low. However, all Consultation Authorities responded and their comments were generally very positive.
8. The Interim ER was then revised in tandem with the LDP process as it went forward. A draft proposed LDP was approved with amendment by Council in December 2015. This non-statutory stage was required to finalise proposed sites to allow technical work including the Environmental Report to be completed for the proposed LDP stage. The decision on the draft proposed LDP was "subject to the required technical work on cumulative impacts, presentational and editorial amendments for publication and to be brought before the Council in due course for ratification as the Council's proposed plan". The Interim ER was listed as a background paper and was available to Councillors at this point.
9. The Council view³ on the officers' draft proposed LDP included:
 - the removal of housing proposal for 1000 units and proposal for a secondary school at Goshen (Proposals MH9 and MH10 in the draft Proposed LDP)
 - Removal of proposal for a housing land safeguard on land at Drummohr (Proposal MH11 in the draft Proposed LDP)
 - changing proposal Dolphinstone Housing Land Safeguard from a safeguard to an allocation for 600 units (Proposal MH13 in the draft Proposed LDP, Proposal MH10 in the Proposed LDP)

² Available here: http://www.eastlothian.gov.uk/meetings/meeting/5674/members_library_service

³ See East Lothian Council Minutes of Meeting 17 November 2015 and associated documents at http://www.eastlothian.gov.uk/meetings/meeting/5812/east_lothian_council

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- The inclusion of Howe Mire, a site west of Barbachlaw, as land suitable for housing development of 100 units (Proposal MH13 in the Proposed LDP)
- The allocation of 55ha of land between the freight loop, the A1 and Millerhill Marshalling Yards at Craighall (Proposal MH1 of the Proposed LDP,) as suitable for mixed use development; and further exploration and technical work to further the housing allocation there, in line with a viable secondary education facility for the Musselburgh cluster.
- Inclusion of Dolphinstone North as land suitable for housing development of up to 160 units (Proposal PS2 in the Proposed LDP)
- Removal of Proposal PS2 Longniddry South Housing Land Safeguard
- Addition of suitable sites for employment in the North Berwick cluster area from a list of sites at South Mains Farm, Haddington Road East, West Heugh, East Imperial car park, Williamston, Old Gasworks, Gullane Fire School
- Alteration to the working draft LDP at this stage led to parallel revision of the draft Environmental Report and further site assessment work with regards to these additional sites.

10. Following this Council Meeting, further technical work was carried out. The sites at Dolphinstone, Howe Mire and Craighall had already been the subject of SEA site assessment. Site assessments were carried out on the newly suggested employment sites in the North Berwick Cluster. Following this, one hectare of employment land was included in the Proposed LDP at Mains Farm in North Berwick to reflect the approved planning permission and masterplan in place for that site. Other than this, the remaining sites were not included as proposals as they were not suitable on technical grounds or because of environmental issues identified through SEA.

11. Consultation on sites included in the draft Proposed LDP but not previously consulted on at the MIR stage was carried out. These sites had already been subject to SEA site assessment as they had been submitted during the 'Call for Sites' and so included in the Interim ER.

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12. The Proposed LDP was approved for consultation in September 2016⁴, followed by a seven week period for consultation. The Draft ER was published at the same time for consultation. It gave information on the potential significant environmental effects of the Proposed LDP. Publicity for the Proposed LDP and draft ER was via statutory notification, press advertisement, and press release, website, and mailing list. Comments were invited in writing, via email or via the consultation hub. Again, the number of comments made specifically on the Draft ER was low.
13. The Council considered the consultation responses to both the SEA and the Proposed LDP before submitting the documents to the Directorate of Planning and Environmental Appeals (DPEA). The documents were published on the Councils website⁵. No changes to the Draft ER were considered to be necessary at that stage.
14. Following the receipt of the Examination Report from the DPEA, some minor changes were made to the draft ER to reflect changes made to the plan. See Appendix 2. In addition, some further minor changes were made in response to comments made on the draft ER when it was available for consultation at the proposed LDP stage. These changes are set out in Appendix 3.
15. The final Environment Report was available to Councillors prior to decision and placed on the Council's website in the Members Library (which is accessible to the public).

A. Integration of Environmental Considerations into the plan

16. Before the LDP was prepared, the key environmental issues likely to be faced in East Lothian were identified. This was done in consultation with the Consultation Authorities. These environmental issues were recorded in Table A of the Environment Report. The following table shows how they have been integrated into the LDP. The issues are often not unique to East Lothian, and Scottish Planning Policy often addresses them. An LDP policy response reflecting Scottish Planning Policy is therefore often the best response to the problems identified. Sometimes there is a balance to

⁴ Documents available following the links from here: http://www.eastlothian.gov.uk/meetings/meeting/5986/members_library_service

⁵ Available titled " 32/17 Proposed East Lothian Local Development Plan – Strategic Environmental Report on Consultation Responses"
http://www.eastlothian.gov.uk/meetings/meeting/6049/members_library_service

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be made between issues (e.g. reducing the need to travel and avoiding development on Green Belt land). Development requirements also need to be met. This means not all effects can be completely avoided. There are inter-relationships between objectives for example improving the number of people using active travel will benefit human health as well as mitigate air quality and climate change effects.

17. Table 1 below shows how the plan has addressed the environmental issues identified. In line with Table A of the ER in this table, the changes suggested by the Consultation Authorities are indicated as follows: Brown: Historic Environment Scotland, Green: Scottish Natural Heritage, Blue: Scottish Environmental Protection Area)

Table 1: Key Environmental Issues for the LDP

KEY ENVIRONMENTAL ISSUES		
SEA Objective	Issues	LDP response
Biodiversity, Flora, Fauna	<ol style="list-style-type: none"> 1. The cumulative impact that bringing forward additional development land could have on East Lothian’s extensive international, national and local nature conservation designations, particularly the Firth of Forth and the Forth islands SPAs and including that which is not subject to statutory protection and outwith designated sites; 2. New development could have an impact on protected species, e.g. bats, badgers and water voles &c. 3. the need to encourage Through the creation of and enhance biodiversity and ecological networks; 4. Through the creation of green networks to contribute to the delivery of a wider Central Scotland Green Network and habitat connectivity etc. 	<ol style="list-style-type: none"> 1. Policy NH1 Was included with the aim of protecting Natura 2000 sites including supporting habitat. Policy wording was added to certain proposals to highlight the requirement for Habitat Regulation Appraisal. Habitat Regulation Appraisal was carried out for the plan which identified the need to secure habitat management for wader species of the Firth of Forth Special Protection Area, which will be provided through Proposal MH18. The need for further information on the impact of recreational use of parts of the coast on the qualifying interest of the Firth of Forth Special Protection Area was identified. Policies NH2 and NH3 protect nationally and locally designation biodiversity sites while Policy NH5 protects biodiversity on and near development sites. 2. Policies NH4 and NH5 were included in the plan to ensure that impacts on protected species are considered in the grant of planning permission. The Environment Report considered records of Protected Species in site assessments. 3. The designation of Local Biodiversity sites was based on a network approach which supports biodiversity and ecological networks. Policy DC10 provides for the identification of the Green Network which will support this.

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		4. Policy DC10 supports the creation of Green Networks; Policy DP1 and DP2 require this to be taken into account in proposal design. Preliminary work on Green Networks was also taken into account in drafting site briefs.
Population	<ol style="list-style-type: none"> 1. The need to provide housing land, including affordable housing, and promote regeneration and reduce inequalities; 2. There is a need to balance the requirement for, and location of, new housing against the availability and provision of employment opportunities to help redress the current significant levels of out-commuting from East Lothian, particularly by less sustainable forms of transport; 3. The need to secure the development of sustainable mixed communities that are accessible, well-designed, as self-contained as possible, and have an appropriate range of housing and local employment, social and community facilities and infrastructure &c. 	<ol style="list-style-type: none"> 1. The housing land requirement was met in full. Policy HOU3 and HOU4 aim to secure a full affordable housing contribution. Supplementary Planning Guidance on affordable housing was introduced alongside the LDP. The compact strategy focusses both employment and housing development in the west of the area, where more opportunity for regeneration exists. An Equality Impact Assessment of the LDP was carried out. 2. The compact strategy also aims to locate new housing close to centres of employment, where transport links are available. A range of employment land is supported and allocated across East Lothian. Transportation policies encourage sustainable active travel and land is safeguard for rail enhancement and the Segregated Active Travel Corridor, which aims to support commuting by sustainable modes. Road enhancements will improve access for road based public transport. 3. The housing land requirement set by SESPlan 1 has been met in full with an allowance for generosity. The employment land requirement has been exceeded. Policies to protect existing housing amenity and employment uses have been included. Developer contributions have been set to secure community facilities and infrastructure where required for new development. The LDP includes the intention to produce supplementary planning guidance including the Design Standards for new housing areas, development briefs and other design guidance.
Human Health	<ol style="list-style-type: none"> 1. The need to ensure that new development can be well-connected into walking and cycling networks so that increased physical activity and active travel can be promoted, including through the green network; 2. The need to secure the proper provision of greenspace and sports pitch provision in new development so people can make positive life style choices; 3. The traffic impacts of new development including noise or air quality related impacts, and the need to select locations for new development which minimise the need to travel and are accessible to public transport, thereby minimising emissions (particularly in Tranent 	<ol style="list-style-type: none"> 1. Transport Policy T1 requires that new development is located on sites that are capable of being conveniently and safely access by foot and cycle, and must not adversely affect the attractiveness of walking and cycling in the area. Supplementary Planning Guidance on the Green Network will be brought forward in association with the plan. Active Travel Routes and Core paths are protected. 2. Policy OS1 protects existing open space and Policy OS3 and OS4 sets out the requirement for new open space and play provision required for new development. Proposal CF1 provides for new sports pitches. LDP Policy DC10 requires relevant development to contribute to the Green Network, as identified in the Green Network Strategy, which will be adopted as supplementary planning guidance.

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	and Musselburgh town centres) <u>and that do not increase flood risk</u> ;	3. The compact strategy has been chosen to reduce journey distances. LDP policy encourages walking, cycling and public transport use, and sites have been chosen with this in mind. Proposals are included to address traffic related air quality issues in Tranent and Musselburgh. Policy requires that development is not at unacceptable risk of flooding and does not increase flood risk elsewhere.
Soil	<ol style="list-style-type: none"> 1. The need to deliver additional development land, particularly housing, may have an impact on soils that have an important role in water quality, flood prevention and biodiversity; 2. It is unlikely that East Lothian’s development requirements can be delivered without some impact on its supply of greenfield land and prime quality agricultural land and on other carbon rich and rare soil types 	<ol style="list-style-type: none"> 1. LDP Policy NH7 sets out where development on prime agricultural as well as rare or carbon rich soils will not be permitted, giving them some protection. Provision is made for inclusion of SUDS to avoid risk of flooding from new development. The LDP does not support proposals that would have a detrimental impact on the water environment. 2. Loss of some greenfield land is inevitable if development requirements are to be met; prime agricultural land is distributed in the areas that are most suitable for accessibility and regeneration therefore there will be an impact on prime quality agricultural land. There may also be some development on carbon rich and rare soils.
Water	<ol style="list-style-type: none"> 1. The requirement to identify additional land for development while seeking to avoid land which is liable to flood or the development of which would increase a flood risk elsewhere, <u>thereby also recognising the relationship between this and human health</u>; 2. The need to mitigate the impacts of flooding and to adapt to and be resilient to future flood risk; 3. The requirement to consider aspects of the water environment - for example, pressures relating to sewage disposal, water resources or potential physical changes to the water environment - that may be affected by the LDP; 	<ol style="list-style-type: none"> 1. The Plan has not promoted development in flood plains other than where it is protected by existing or planned schemes such as at Mill Wynd in Haddington. The policies of the plan require flood risk to be taken into account. 2. The plan requires new development to protect and enhance the water environment. This is a key tool to protect existing flood plains. The Strategic flood risk assessment provides more information on this. 3. The plan requires new development to protect and enhance the water environment. Consultation was undertaken with Scottish Water and development located where capacity was or could be made available within the lifetime of the plan.
Air	<ol style="list-style-type: none"> 1. The need to provide for additional development while ensuring that its traffic / air quality impacts are minimised, <u>including on human health</u>, by choosing locations which integrate land use and transport and minimise the need to travel and are accessible via public transport and active travel options; 2. In particular, to ensure that new development is planned alongside measures that seek to manage Air Quality within acceptable limits at Musselburgh and Tranent; 	<ol style="list-style-type: none"> 1. The compact strategy was chosen to reduce the need to travel and length of journey undertaken by private car. Active travel is encouraged and supported. Availability of public transport and location close to existing settlement was also considered in selecting sites for new development. 2. The land use component of proposals to address air traffic problems caused by traffic in Musselburgh and Tranent High Streets have been included.

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<p>Climatic Factors</p>	<ol style="list-style-type: none"> 1. To ensure that the traffic impacts of new development are minimised by choosing locations which minimise the need to travel as well as the distance that need be travelled and are accessible to public transport, thereby minimising additional greenhouse gas emissions; 2. To ensure that East Lothian’s settlements are resilient to the impacts of a changing climate, including rising sea levels, drier summers, wetter winters, and an increased frequency of heavy rain events; 	<ol style="list-style-type: none"> 1. One of the aims of the plan is to promote sustainable development by contributing to climate change objectives. Also see ‘air’ above. 2. The plan directs development away from areas of flood risk and requires new development to take account of flood risk. Open space is protected and the Green Network is promoted, with the aim of allowing people good access to the outdoors. Trees are protected by requiring replacement planting on development sites. Biodiversity sites have been designated taking community access into account. This will help give opportunities for people to seek shade in hotter, drier summers.
<p>Material Assets</p>	<ol style="list-style-type: none"> 1. The need to minimise the loss of greenfield land and to maximise the reuse of existing buildings and previously developed land as well as make an efficient use of land if developed; 2. To recognise that potential mineral reserves in East Lothian, particularly coal that could be extracted by opencast means, often occur in populated areas set within an open, attractive landscape where the intervisibility and proximity of workings and settlements would be a significant landscape and visual impact and amenity issue; 3. The constraints generated by the lack of available infrastructure capacity; 4. The need to ensure the reduction, reuse and recycling of waste; 	<ol style="list-style-type: none"> 1. The re-use of brownfield land or existing buildings has been priorities however there are few such sites in East Lothian, and certainly not enough to meet development requirements. The plan contains a housing density policy with the aim of increasing average densities and so making efficient use of land. 2. The plan does not allocate a site for opencast coal and the plan recognises the remaining unworked coalfield is subject to considerable constraints which militate against extraction. A criteria based policy for mineral extraction has been included, and the plan also includes safeguards for existing mineral workings. 3. The LDP and Developer Contributions Framework Supplementary Guidance recognises the constraints generated by lack of available infrastructure capacity and where new development is proposed developer contributions are sought for this. Additional funding will also be required in particular for transport interventions. The Action plan sets out indicative costs and joint working required to address this. 4. The plan aims to support the waste hierarchy and the Zero Waste Plan. Waste management sites are identified and safeguarded. New development is required to include provision for waste separation and collection, while major sites require to provide re-cycling sites and produce site waste management plans. Design policy for major housing sites requires the provision of waste recycling facilities.
<p>Cultural Heritage</p>	<ol style="list-style-type: none"> 1. To accommodate additional development requirements while <u>preserving and enhancing historic environment features, including their setting, and</u> ensuring that the impact on the cultural heritage of East Lothian’s towns, villages and rural areas is minimised including that which 	<ol style="list-style-type: none"> 1. Impact on cultural heritage was considered during site selection, and impacts generally avoided. Development Briefs prepared alongside the plan note treatment of aspects of the cultural heritage where appropriate. Supplementary Planning Guidance on Cultural Heritage including Conservation Areas will be published following adoption of the LDP. LDP

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	is not subject to statutory protection and outwith designated sites;	Policy protects Listed Buildings, Conservation Areas, Battlefields, national and local Gardens and Designed Landscapes, Scheduled Monuments and provides for the protection or recording of unknown archaeology.
Landscape	<ol style="list-style-type: none"> 1. to accommodate development requirements while minimising any adverse visual and landscape impact; 2. to minimise the impact of new development on the landscape and the setting of communities and to avoid settlement coalescence where possible and appropriate; 3. to accommodate additional development while respecting the form and identity of existing settlements and the settlement pattern; 4. To conserve or enhance important areas of green space and prevent town cramming. 	<ol style="list-style-type: none"> 1. Landscape assessment informed site selection. Development briefs have been prepared to help absorb new development into the landscape. LDP Policies DP1 and DP2 give design criteria for new development to minimise adverse visual and landscape impact. 2. Green Belt has been retained (though with some areas removed) and Countryside Around Towns policy introduced to reduce coalescence and protect the setting of settlements. There is a balance between preventing coalescence and promoting reduction of travel especially by car. Supplementary planning guidance on Special Landscape Areas and landscape character areas will be produced in line with the 'all landscapes' approach. 3. Development has been focussed around the main settlements. There is a pattern of development which consists of large scale settlement to the west of the area, with small towns and villages along the coast and in the lower lying areas, with much sparser development on higher ground. This pattern has largely been retained though some settlements have seen considerable expansion to meet housing land requirements. 4. The plan protects important areas of green space. Infill development is supported subject to criteria including protection of amenity. Design polices will have a role to play here also.

18. The LDP has also adjusted the allocated site boundaries from the sites submitted by landowners and others, including as shown in Table C below to take into account the findings of the SEA and to minimise negative environmental effects.

B. How the Environment Report has been taken into account

19. The ER has been taken into account throughout plan preparation. The process of preparing the LDP and the Environment Report have been carried out in tandem. The choice of strategy was influenced by the findings of the Interim ER that the effects of this choice would be less than those of the reasonable alternative. The ER also informed the approach to policy within the LDP.
20. The Site Assessments informed the allocation of sites, however did not dictate that choice. Each Site Assessment included a text commentary on each of the factors listed in the SEA Act. For a visual aid, red/amber/green scoring along with a summary symbol from “- -” (very negative) to “+ +” (very positive) through ‘o’ – neutral and ‘?’ uncertain was included. In particular, the fact that a site had a ‘red’ score against one or more factors did not necessarily rule it out. It was clear from the outset for example that it would be difficult to meet the housing land requirement without adverse effect on the SEA objectives for soil. The final choice of sites and policy approach was through professional judgement with reference to factors included in the assessments. The MIR consultation responses, representations to the Proposed LDP and the Report of Examination were also fed into the outcome. The SEA was used in plan making and could continue to be used to identify what mitigation may be necessary.
21. In some cases the boundaries of sites were altered from those submitted in the Call for Sites. Sometimes this was done due to effects identified through the SEA process, sometimes for other reasons. Table 2 below shows where boundaries have been altered.

Table 2: Changes to Site Boundaries

CHANGES TO SITE BOUNDARIES		
LDP Ref	MIR Site Assessment Reference	Change and relationship with ER Site Assessment
Tranent		
PROP TT6 Kingslaw	PM/TT/HSG028 and PM/TT/HSG029	Area reduced in size from site assessment to reflect area of carry-forward allocation from East Lothian Local Plan 2008. The site assessments included land with existing built development and operational land uses in the west. In the east areas of countryside were included and these were excluded to ensure a logical settlement boundary and to minimise landscape impact.
PROP BW1 and PROP BW2	PM/TT/OTH103 PM/TT/HSG013 PM/TT/HSG004, and PM/TT/OTH003	The site was delineated to support Council's vision of a comprehensive solution for a larger settlement at Blindwells. It excludes land at St Germain's, prioritising previously developed land and to mitigate identified landscape and cultural heritage effects.
PROP TT5 Bankpark	PM/TT/HSG076	Area reduced in size to remove area to the NE containing a steep tree-lined area including a path to mitigate Landscape and Cultural Heritage effects.
PROP TT7 Macmerry North	M/TT/HSG053 and MIR/TT/HSG135	The northern section of these sites were not allocated for development. Landscape assessment identified this section as not relating well to the existing settlement and being a less logical expansion of the village than the remainder of the site. The

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		contribution of the site to settlement coalescence between Macmerry and Tranent was also identified as an issue. The reduction of the size of the site partially addresses this.
PROP TT9 Gladsmuir East	PM/TT/HSG045 (see also PM/TT/HSG089)	The PM/TT/HSG045 site was reduced to achieve better housing layout. This also mitigates the Landscape impact identified of a significant expansion that could potentially change the character of the village.
PROP TT15 Humbie North	PM/TT/HSG061	This site was reduced in size in the proposed LDP to mitigate the impact described in Landscape, that development of a large proportion of it would represent a significant impact on the character and scale of the village. The site was subsequently removed from the plan through Examination
Dunbar		
PROP DR2 Hallhill North, Dunbar, and DR3 Hallhill Healthy Living Centre Expansion Lane	SDP/DR/HSG007 and PM/DR/HSG038	Blocked up underpass under railway included to allow for potential to improve active travel and consequent climate change impact identified under Climatic Factors in the ER Site assessment for this site
Haddington		
No change		
Musselburgh		

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PROP MH2 Land at Old Craighall Village	PM/MH/HSG056 and SDP/MH/HSG003	Site area reduced to avoid adverse impact on the setting of 'A' Listed Monkton House identified in Cultural Heritage commentary
PROP MH15 Land at Whitecraig North	PM/MH/HSG055	Northern part of the site removed from allocation to avoid impact identified in Cultural Heritage commentary namely impact on Scheduled Monument 13318
LDP PROP MH1: Land at Craighall, Musselburgh	PM/MH/HSG007	Additional area to the west of QMU and south of the A1 added to ensure allocation is co-terminous with local authority boundary.
Prestonpans		
LDP PROP PS1	PM/PP/HSG050	Site reduced in size to reflect the scale of development the Council would wish to promote here. This also mitigates the Cultural Heritage impact on setting of Gosford House Garden and Designed Landscape to the north described in the Site Assessment and raised by HES and reduces impact on soil, material assets and to some extent landscape.
North Berwick		
LDP PROP NK5: Land at Ferrygate Farm	SDP/NK/HSG004	Site reduced to reflect area subject to planning appeal decision.
LDP PROP NK4; Land at Tantallon Road	PM/NK/HSG070	Part of the site to the east of Heugh Road removed mainly to address concerns raised by HES on Cultural Heritage: the setting of North Berwick Law. This part of the proposed site also raises landscape issues and is within a Local Geodiversity Site which

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		would be harmed by the allocation. Minor boundary alteration to exclude property at Sea Breezes.
LDP PROP NK7: Saltcoats Field	PM/NK/HSG060	The western part of the site removed due to Landscape and Cultural Heritage impacts. The site submission suggested works on the main site (Saltcoats field) could fund consolidation or conversion works to Saltcoats Castle. This was not required and so the part of the site at Saltcoats Castle was not included as a proposal.
PROP NK10: Aberlady West, Aberlady	PM/NK/HSG039, PM/NK/HSG116 and PM/NK/HSG098	Sites amalgamated: the larger site makes for better planning of the area.

C. How the Opinions expressed through consultation have been taken into account

22. Consultation as set out by statute is a key part of both preparation of the LDP and its accompanying ER. The views of the public and consultation authorities have been sought throughout the plan preparation process. The Participation Statement published alongside the LDP shows how the public have been involved. Briefly, the Council carried out a programme of pre-MIR engagement, the results of which were written up by Planning Advice Scotland. This was then taken into account in the preparation of the MIR. Consultation was then held on the MIR, and responses received from the public, development industry and other organisations. These were summarised and reported to Council in April 2015⁶. The responses then

⁶ See 'Responses to Consultation on the MIR and Interim Environment Statement for the East Lothian LDP by following link from here: http://www.eastlothian.gov.uk/meetings/meeting/5504/east_lothian_council ; responses to the Interim Environment Report are at Appendix 2.

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fed into the preparation of the Proposed LDP. The Council then published the Proposed LDP for representation. The Council considered its responses to representations made and set out its position in Schedule 4 forms for the DPEA⁷.

23. Alongside this, engagement and consultation has taken place on the SEA. The views of the public, development industry, other organisations and the Consultation Authorities have helped form the shape of both the LDP and the ER. Views were sought from the public and interested parties on the interim and draft ER at MIR and Proposed LDP stages. The Council worked closely with the Consultation Authorities as the work progressed, as set out above and in Appendix 1.
24. The ER was first fully consulted on at MIR stage. Consultation was undertaken in both written form and via workshops. Summaries of the responses to both the MIR and the Interim ER were prepared and reported to Council in April 2015 – see “Consultation Feedback: Summaries and Key Messages and IER Responses Part 1 and Part 2⁸”. Comments from the Consultation Authorities were incorporated into the draft ER published alongside the proposed LDP. These comments are shown throughout the text, using colour coding to show the comments that have been made by each Consultation Authority (as shown in Table 1 above). Having made changes suggested by the Consultation Authorities, the Council made no further changes in light of responses to the Interim ER.
25. Of particular note, through consultation on the Main Issues Report *in general* there was support for the compact strategy, although not all respondents supported it, in particular those in the west of the area. There was concern about the scale of growth and its impact on both the environment and infrastructure. The loss of significant areas of prime agricultural land was a concern, as was the impact on settlement character. The need to ensure support for town centres was raised. There was emphasis from the development industry that new housing needs to be in marketable locations. Flood risk was raised as an issue.

⁷ Schedule 4 forms setting out the Council’s position are available here:

http://www.eastlothian.gov.uk/downloads/download/2460/local_development_plans_schedule_4_forms

⁸ See Consultation Feedback: Summaries and Key Messages and IER Responses Part 1 and Part 2 available here:

http://www.eastlothian.gov.uk/info/204/local_development_plan_main_issues_report/1470/local_development_plan/2

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26. MIR consultation responses, as well as environmental considerations, influenced the choice of the compact strategy over the alternative dispersed strategy in the Proposed LDP. Concerns about the scale of growth were recognised. The Proposed LDP made efforts to limit the impact of growth on both the environment and infrastructure. This included refreshing the designation of sites of local interest for biodiversity, geodiversity, landscape, and recognising areas of countryside around towns that should be protected. Supplementary Guidance on Developer Contributions was prepared to secure contributions towards essential infrastructure, while maintaining development viability. The Proposed LDP contains policies in support of town centres, and proposes development sites taking flood risk into account. Loss of green field and prime agricultural land was unfortunately unavoidable as it is widely distributed in the area in the most accessible locations as well as other parts of East Lothian.
27. At Proposed LDP stage the Consultation Authorities made some minor suggestions for how the Draft ER might be improved. The lack of requests for significant change may be as a result of the earlier engagement process. The Consultation Authorities noted however that their suggested changes would not change the outcome of the SEA overall. Their comments were included throughout the Draft ER published alongside Proposed LDP in different coloured print so their comments can be read in context.
28. On publication of the LDP, consultation of the public and Consultation Authorities was undertaken as required by the Town and Country Planning (Scotland) Act 1997 (as amended) and the Environmental Assessment (Scotland) Act 2005. A wide variety of comments were received on both documents. Representations to the plan were considered and the Councils response to these have been set out in the Schedule 4 forms submitted to the DPEA⁹.
29. On the Draft ER, consultation responses were received from all Consultation Authorities as well as 21 responses from other organisations and members of the public and 11 from developers. No further changes were made before the draft ER was submitted to the DPEA along with the LDP. However, some changes were made in light of these comments before publication of the final ER. The changes were made at that point to inform the final decision by Councillors on whether or not the Council intends to adopt the LDP. How the comments made have been dealt with is shown in the table in Appendix 2.

⁹ These can be viewed online here: http://www.eastlothian.gov.uk/downloads/download/2460/local_development_plans_schedule_4_forms

30. Following receipt of the Examination Report, the Council has considered whether further changes are needed to the ER prior to adoption of the LDP. To do this the Council has held an additional meeting with the Consultation Authorities to discuss their response to the draft ER and the implications from the Examination Report. The outcome of this consultation is reflected in the final ER and within this Post-Adoption Statement.

D. Notification of Transboundary Effects

31. The SEA Act requires that where there are likely to be significant environmental effects on another EU Member State, the Secretary of State should be notified. The Secretary of State will in turn pass on a copy of the plan to the Member State, and if that Member State so requests, consultation will follow.

32. The ER does identify some effects that are or may have the potential to be transboundary. Although effects on climate and air are expected to be positive compared to the alternative option, the ER identifies negative effects over the current position. A negative impact on climate change will have global effects, and other emissions to air also have the potential to have transboundary effects. Advice from the EU suggests that *“the judgment of impact magnitude and significance must be context-specific. For an individual [plan] while its contribution to greenhouse gas may be insignificant at the global scale, it may well be very significant at the local or regional scale in terms of its contribution to targets set at those levels for greenhouse gas reductions”*. This is the case with the LDP. It is recognised that there are effects to climate, and potentially to air, which will or may have transboundary effects. However, the effects on other Member States are diffuse and the impact of the LDP is not significant at the transboundary scale. The climate and air effects are not unusual in that they would not of themselves cause the UK to fail to reach its climate targets overall or obligations under UNECE Convention on Long-range Transboundary Air pollution.

33. In line with the approach taken by higher tier plans (including SESPlan), given the approach taken has less impact than the reasonable alternative and ‘doing nothing’ is not an option, it is not considered that there are significant effects requiring notification.

E. Reasons for finalising the Plan as adopted in light of the reasonable alternatives

34. The main choice faced during plan preparation was between a focus on development in the west of the area, the “compact approach” and a more even spread, the “dispersed approach”. Within this there were choices to be made over sites, however the effect of any individual site is not as significant as the overall strategy. The effects of the chosen strategy (“compact approach”) and the reasonable alternative (dispersed approach) are shown in the Environment Report. It is a legislative requirement that the LDP is produced. It must conform to SESPlan, including meeting its requirements for housing and employment land. ‘Do nothing’ was therefore not a reasonable alternative, though commentary has been provided on the change from the baseline of both possible strategies and the site assessments.
35. The ER shows the different effects of the two approaches, summarised on pages x – xxi. This shows that with the compact approach there is the opportunity to secure more significant positive environmental effects for certain SEA objectives, and reduced effects on others. This approach allows consideration to be given to longer term infrastructure provision as well as seeking opportunities for through strategic improvements to the Green Network. The compact strategy is in particular expected to have less significant effect on climate, air quality, and soils, and has benefits for regeneration too. The Council has a duty under the Climate Change (Scotland) Act in exercising its functions to act in the way best calculated to contribute to delivery of the Acts emissions reduction target, and in the way it considers most sustainable. Choosing the option expected to produce the least climate impact was therefore an important driver for the choice of approach. This Council used the Scottish Governments SPACE tool to help judge this. It is also considered the most sustainable choice in line with Scottish Planning Policy, and the best approach to provision of infrastructure to enable development to take place successfully.

F. Monitoring of the significant environmental effects of the implementation of the plan

36. Monitoring arrangements are required by the Town and Country Planning (Scotland) Act 1997 (as amended), namely the production of a Monitoring Statement and Action Programme. It is proposed to use these two processes to monitor the significant effects of the plan.

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37. The Monitoring Statement provides the environmental baseline for the emerging LDP. A Monitoring Statement was published alongside the MIR and the IER. It discussed the changes in the main physical, economic, social and environmental characteristics of the area and the impact on these of the policy and proposals of the previous plan. Such a Monitoring Statement must be produced for each review of the LDP.
38. In addition, Action Programmes set out how the planning authority proposes to implement the plan. A draft Action Programme was published along with the LDP. It will be finalised with the adopted LDP and reviewed at least every two years thereafter. The Action Programme would generally show how mitigating actions will be delivered such as the publication of Supplementary Planning Guidance and when key infrastructure will be delivered.
39. SEPA has suggested setting up a joint working mechanism for monitoring of the LDP. The Council intends to take this forward involving other Consultation Authorities also.

Appendix 1: Chronology of SEA Activity

Figure 2 Chronology of SEA activity

Activity	Date
Project inception meeting with the consultation authorities on approach to SEA	September 2011
Awareness raising – publicity surrounding the intention of the Council to begin preparation of the plan, including the need for SEA	April – May 2011
Scoping Report prepared and sent to SEA gateway	November 2011
Call for sites	Spring 2012
Pre-MIR engagement	July 2011 to June 2013
Scenario testing and site assessment, preparation of detailed site assessments alongside initial stages of Habitats Regulations Appraisal, which helped inform the site assessments	June 2013 – September 2014
Series of meetings with Consultation Authorities over SEA and correspondence over site assessments	June 2013 – September 2014
Publication and consultation on both the Main Issues Report and the Interim Environmental Report (IER)	November 2014 – February 2015
Interim Environmental Report sent to SEA Gateway	November 2014

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Comments on the IER were accepted through in writing, via email and on the Councils consultation hub	November/December 2014
Receipt of consultation responses on the IER from the consultation authorities	February 2015
IER consultation responses summarised and reported to Council	21 April 2015
Council approval of a draft Proposed Local Development Plan to allow further technical work to be carried out	November 2015
Preparation of site assessments on additional sites	
Consultation on additional sites not included in the MIR but proposed for inclusion in the LDP	February/March 2016
Council approves the proposed Local Development Plan for representation, along with the revised Environment Report for consultation	September 2016
Revised Environment Report sent to SEA Gateway	September 2016
Consultation period on proposed Local Development Plan and the draft Environment Report	September 2016 – November 2016
Consultation authorities provided response on revised Environmental Report	November 2016
Consideration of responses to the consultation	November 2016 – February 2017
The Council approves Schedule 4 forms as a response to unresolved representations to the LDP	March 2017

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Responses to the consultation on the draft Environment Report published	March 2017
Proposed LDP and draft Environment Report submitted for examination	May 2017
Publication of Report of Examination	March 2018
Update of Environment Report to take account of modifications	March/May 2018
Meeting with Consultation Authorities to consider Examination Report and implications for ER	March 2018
Publication and advertisement of the Environment Report	June 2018 (tbc)
Adoption of LDP informed by finalised Environment Report	June 2018 (tbc)

Appendix 2: Changes to the Draft Environment Report following Examination

Nothing arising from the Examination Report into the following Issues required amendment to SEA: 1, 2, 5, 9a, 10, 11, 12, 13, 14, 15, 16, 18a, 18b, 18c, 18d, 18e, 18f, 19, 20, 21, 22, 22a, 22b 23, 24, 25, 26, 27, 28, 29, 31, 32, 33, 34

Modifications related to issues 3, 4, 6, 7, 8, 9, 17 do not result in changes to the SEA other than as noted below:

Issue	Modification	Implications of this modification for the SEA
3: Musselburgh	<u>Modification 4</u> : Deletion of Policy MH17: Development Briefs	Deletion of references to Policy MH17 which duplicates the effect of Policy DP9
4. Prestonpans	<u>Modification 4</u> : Deletion of Policy PS3: Development Briefs	Deletion of references to Policy PS3 which duplicates the effect of Policy DP9
6 Tranent	<u>Modification 13</u> : Deletion of Policy TT17: Development Briefs	Deletion of references to Policy TT17 which duplicates the effect of Policy DP9
7 Haddington	<u>Requisite modifications not identified by Reporter</u> : Deletion of Policy HN9; Development Briefs as mitigation	Deletion of references to Policy HN9 which duplicates the effect of Policy DP9
8 Dunbar	<u>Modification 2</u> : Deletion of Policy DR12; Development Briefs	Deletion of references to Policy DR12 which duplicates the effect of Policy DP9
9 North Berwick	<u>Modification 4</u> : Deletion of Policy NK12: Development Briefs	Deletion of references to Policy NK12 which duplicates the effect of Policy DP9
17 Open Space and Play Provision	<u>Modification 5</u> : Deletion of Proposal OS5: Potential Cemetery Extensions	Deletion of references to Proposal OS5: Potential Cemetery Extensions and consequential re-numbering of following proposal/policy. The removal of this policy does not affect the environmental assessment as it would still be possible to deliver cemetery extensions through the planning process in appropriate locations, if assessed against the policy framework of the plan. Therefore there is no significant environmental effect of deleting this policy from the plan.

APPENDIX 3 – How comments on the Draft Environment Report have been taken into account

	Summary of Comment	ELC Response	Change to ER
Historic Environment Scotland			
1	<p>Mitigation of Cultural Heritage Impacts HES note that cultural heritage policies are identified as mitigation in all instances, and are content with this other than as regards Policy DC5: Housing as Enabling Development. As currently worded, it is possible that it will not mitigate against impacts on cultural heritage in some instances. HES request changes to policy wording of the LDP.</p>	<p>The plan has been amended to allow for enabling development to be allowed only where it is the only means of preventing loss of the asset, and to allow enabling development to take place off site.</p>	<p>Modification through Examination to LDP Policy DC5 means wording of ER does not require change as there is now no exception to the use of cultural heritage policies as mitigation.</p>
2	<p>Site assessments – General Comments HES welcome the detailed assessment, and inclusion of sites which have not been taken forward. This is useful in providing a comparative assessment of reasonable alternatives. It has been very helpful to have had the early opportunity to comment on allocations at previous stages.</p>	<p>It is noted that HES welcome the detail of assessment, and that the methodology is in line with local and national policy regarding effects on setting.</p>	<p>No change requested.</p>

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	<p>The narrative sections of the assessment are helpful in supporting the conclusions on impact. Consistent reference is made to protection of setting as well as the assets themselves and the methodology is therefore in line with local and national policy.</p>		
3	<p>Site Assessments: Scoring of Individual Allocations Where two values for impact have been identified it may be helpful to explain this in the text where possible, especially where impacts on multiple designations are identified.</p> <p>It would have been helpful to have further text to explain where allocations with the same SEA score (plus/minus) have been given different planning assessment (red/amber/green) values.</p>	<p>Where two values for impact have been given, reasoning is given in the accompanying text, which sets out which assets have been impacted. It is considered that this is preferable to giving one overall score as this could suggest that a negative impact on one asset could be mitigated by a positive impact on another, potentially obscuring a negative impact on an asset. Reading the score and the text together is considered sufficiently clear; the Red/Amber/Green and plus/minus scoring are intended as a 'quick reference'.</p> <p>The method for giving SEA score and planning assessment values has been set out at the start of the assessment. The reason for the assessment can therefore be found by reference to</p>	<p>No change</p>

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		<p>this methodology. The site assessments are already lengthy documents and it is not considered necessary to include this explanation in each one.</p>	
4	<p>Site Assessments: Allocations not assessed in ER There are a number of allocations in the plan which have not been assessed in the ER. It is not clear how this distinction has been made, but it appears that sites with planning permission have not been assessed. HES note that this is in line with PAN 1/2020 paragraph 4.22 which states that sites with consent should be viewed as part of the baseline, but taken into account within the assessment of cumulative effects. However, while these sites were allocated through the ELLP 2008 the Inventory for Historic Battlefields was not in place at the time. This change to the baseline means that their impact on the historic environment have not been fully considered through the SEA process. Such sites could contribute to cumulative impacts, particularly at Pinkie.</p>	<p>PAN 1/2010 is clear that SEA should focus on the strategic environmental effects of the plan (PAN 1/2010 para 3.1) and avoid excessive data collection and descriptions of baseline data (PAN 1/2010 para 5.2). The SEA has therefore considered cumulative effects of additional sites in this context. Consideration of cumulative effects are implicit to the assessment since both the Battlefield designation and pre-existing permissions were in place when it was carried out and the SEA was done in that context.</p> <p>Housing sites PROP NK3 and PROP DR1 are the only mapped LDP Proposals not to have a site assessment, both of which are</p>	<p>No change.</p>

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	<p>established housing sites carried forward from ELLP 2008. PROP NK3 is now constructed, while PROP DR1 has received planning permission and is under construction. For areas listed in the Tables at the end of each Cluster Area, the sites given are not allocations: this is made clear in the pre-text to the table. The LDP explains that the development of these sites in accordance with relevant LDP policies is supported in principle by the Council – i.e. not necessarily by consultees to any planning application, such as SEPA. Whilst some of the sites have been rolled forward from previous plans, the majority of the sites set out in the relevant table already have planning permission for development, and so are committed sites. The majority of the sites covered by EMP1 consist of existing development.</p> <p>In SEA terms they have been treated as part of the baseline, in accordance with PAN 1/2010 (paragraph 4.22). It</p>	
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		<p>is important to note that this is also true of many sites where a policy reference is given. Development on some of these sites has also already commenced, but in some cases stalled, so planning permissions are being implemented or remain live. For some sites their planning permission references are shown instead of policy references. This is because some of them are within the countryside and it would be impractical in a mapping sense or in a policy / proposals sense to specifically identify those sites: yet the Council would support the principle of their development in line with LDP policies, subject to the development management process.</p>	
5	<p>Site Assessments: Allocations with boundary alterations not reflected in the ER Some LDP allocations have been assessed in the ER under a difference boundary, normally reflecting changes through consultation process. For some allocations, more significant</p>	<p>Site assessments in some cases cover a wider area than the proposal in the LDP, often following a reduction in site area to meet concerns identified in the assessment or comments from</p>	<p>Comments have been added to the Site Assessments at 'Site Ref' to make it clear where the Site Assessment differs from the boundaries of the site allocated</p>

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<p>impacts are identified than HES would predict. However, it is more of a concern where alterations have brought allocations closer to heritage assets, if this has not be reflected in the assessment. HES identify one instance of this at PS1. There are also areas assessed in the ER which cover more than one allocation although this is a complete assessment it is confusing as the narrative of the assessment does not always make clear whether the development of part of the area would have the same effect as the whole.</p>	<p>Consultation Authorities. It is agreed that although the boundary alterations of allocations have not been reflected in the ER the assessment is complete, as effects have not been missed. The Council notes the comments on confusion and will take this as a learning point for future assessment however does not consider that change to the ER is necessary as effects have not been missed. The SEA is not a substitute for project level assessment, for which Environmental Impact Assessment (EIA) will be carried out where necessary.</p> <p>In the case of PS1 Longniddry, the site assessment PM/PP/HSG050 extends further eastwards than the allocated site, so in fact the ER assessed site is closer to Gosford GDL than the LDP proposal. Effects on this asset have therefore been fully considered in the SEA.</p>	<p>for development. The LDP site reference has also been included.</p> <p>However the site assessment text has not been altered as effects have not been missed.</p>
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		<p>See also HES Point 16 PS1 Longniddry below</p>	
<p>6</p>	<p>Appendix 1 Welcomes inclusion of relevant documents for cultural heritage however:</p> <p>The reference to SHEP should be updated to the Historic Environmental Scotland Policy Statement https://www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/historic-environment-scotland-policy-statement/</p> <p>PAN 71, Conservation Area Management is relevant to Cultural Heritage as well as Landscape and Townscape</p>	<p>There is a large amount of policy and guidance relevant to the LDP and this is continually updated. The update to the Historic Environmental Scotland Policy Statement (June 2016) will not affect the outcome of the assessment. PAN71 has been included, and although it could have been included in Cultural Heritage rather than Landscape and Townscape it fits within either and has been taken into account. This is considered sufficient.</p>	<p>References to SHEP have been updated. The update does not impact on other parts of the assessment as though the guidance has been updated this is not in a way that materially changes consideration for the SEA. Text added to Appendix 1 <i>“The following Plans, Policies and Strategies are relevant. They are grouped under the main SEA topic though some cover more than one topic, for example PAN 71 is relevant to both Cultural Heritage and Landscape and Townscape.”</i></p>
<p>7</p>	<p>Allocations within Pinkie Battlefield There are a substantial number of other allocations (in addition to MH13 Howe Mire to which HES object) that have the potential to impact Pinkie Battlefield. Most would be individually capable of mitigation however the</p>	<p>It is not the intention of the plan to include all three sites mentioned. MH13 Howe Mire was removed from the plan following examination, and neither Goshen Farm nor the Loan</p>	<p>No change.</p>

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	<p>cumulative impact of allocations in this area needs to be considered in a strategic fashion, especially if land at Howe Mire, Goshen Farm (PM/MH/HSG037) and the Loan, Musselburgh (MIR.MH/HSG133) were all to be included.</p> <p>Other smaller or more peripheral allocations (including MH8 Levenhall, and MH15 at Whitecraig north) may also have an incremental impact on its landscape and special qualities. While these allocations in isolation do not have significant impacts which cannot be mitigated, they do contribute to an overall cumulative impact.</p>	<p>were included. Cumulative assessment of these three sites is therefore not necessary at this stage.</p>	
8	<p>MH2- Land at Old Craighall Village (PM/MH/HSG056) HES note the assessment states HES may object due to impact on setting of Monkton House; following boundary changes [within the LDP allocation] HES are content that significant impacts are less likely.</p>	<p>The boundaries of this site were reduced from the site as submitted and assessed for inclusion in the LDP to reduce the identified effects on the setting of Monkton House following comments from HES. Although the impact is less likely to be significant, it is still relevant information for this site as shown in the ER and so the original wording is retained.</p>	<p>No change.</p>
9	<p>MH5 – Former Edenhall Hospital Site [PM/MH/HSG113] Inclusion of mitigation of impact on listed buildings on this site is fundamental for this allocation as stated in the ER.</p>	<p>The potential for effects on listed buildings, scheduled monuments and the Pinkie Battlefield are noted in the</p>	<p>No change.</p>

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	<p>HES request consideration of the potential for impacts on remains associated with the Battle of Pinkie, and setting of nearby scheduled monuments, including the Catherine Lodge, SM3612.</p>	<p>ER. The cultural heritage policies of the LDP will have an effect in mitigating impact.</p>	
<p>10</p>	<p>MH6 and MH7 – Pinkie Mains and Pinkie Mains (Intensification) The site is within Pinkie Battlefield, though outline planning permission was granted prior it being placed on the Inventory. Note that this site was not assessed in the ER, and no SEA of this impact has previously been undertaken.</p>	<p>See response to Historic Environment Scotland Point 28 below.</p> <p>A site assessment was carried out for MH7. There is an outline permission on both sites (08/01090/OUT). MH6 site has detailed consent (11/00974/AMM) and is in the process of being built. Planning permission has also been granted at MH7 (16/00393/PM).</p>	<p>No change.</p>
<p>11</p>	<p>MH8– Levenhall Notes the ER identifies the area makes some contribution towards the appreciation of Pinkie battlefields characteristics, and are content that mitigation through design can avoid significant impacts.</p>	<p>Noted. HES note that what they require is in the ER.</p>	<p>No change.</p>

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<p>12</p>	<p>MH12 Barbachlaw – PM/MH/HSG067 Land at Barbachlaw is allocated for 94 homes and a stadium in line with planning permission. The land in the northwest of this allocation has no extant planning permission. The site is entirely within Pinkie Battlefield. The ER assesses the impact of this site along with MH13 as part of PM/MH/HSG067. This assessment does not entirely reflect HES advice on this allocation in isolation. The assessment states that development here would raise issues of national significance, which may not be the case for this allocation. The area at Barbachlaw makes a significant contribution to the understanding of Pinkie’s landscape characteristics, as well as potentially having in situ remains. Without mitigation there is potential for development here to have a significant adverse impact on the nationally important battlefield.</p>	<p>HES notes that the assessment states that development here would raise issues of national significance, but consider this may not be the case for the MH12 allocation. A planning application 01/00892/FUL for a greyhound stadium was granted for the northern part of the site in 2001, and is partly built. Planning permission in principle (10/00341/PPM) for residential development on the southern part of the site was granted on appeal in 2011 followed by approval of matters specified in conditions application (16/00751/AMM).</p> <p>The Site Assessment however covers the site as submitted, which includes both MH12 and MH13. The site assessment method does not separate MH12 and MH13 but all the effects are included.</p>	<p>Text added to commentary on PM/MH/HSG067 Cultural Heritage “Historic Environment Scotland considers that development of MH12 Barbachlaw portion of the site (generally to the north) may not raise issues of national importance.”</p> <p>(see HES Point 13 below and Sirius Sport and Leisure Point 1 below.)</p>
<p>13</p>	<p>MH13 Howe Mire – PM/MH/HSG067 The ER identifies potential impacts on Pinkie Battlefield both on understanding of the battle landscape and on</p>	<p>The ER notes that a battlefield monument has been proposed but does not state that this would be</p>	<p>Text added to PM/MH/HSG067 “Historic Environment Scotland considers that development of</p>

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	<p>potential archaeological remains. This impact has been scored as negative, but HES considers it has the potential to be very negative. A battlefield monument would be purely compensatory and not effective mitigation of the potential impacts of development.</p>	<p>effective mitigation. The effects of development of the site on one asset are accepted as being potentially very negative; however this does not represent the complete loss of the asset and is an impact on only one asset. The potential for adverse impact on the Pinkie Battlefield is highlighted in the text and shown as adverse through the scoring system.</p>	<p>MH12 Barbachlaw portion of the site (generally to the north) may not raise issues of national importance. They consider potential effects on the Battlefield through development of MH13 Howe Mire have the potential to be very negative and raise issues of national importance.” and “HES note a battlefield monument would be purely compensatory and not effective mitigation of the potential impacts of development.”</p> <p>(see HES Point 12 above and Sirius Sport and Leisure Point 1 below.)</p>
14	<p>MH15 Whitecraig North – PM/MH/HSG055 The ER site boundary extends north and east of the site comparative to the LDP site. References to a proposed scheduled monument Monktonhall Neolithic cursus are therefore not relevant though its setting should be considered. This area lies in a part of Pinkie Battlefield which contributes to its landscape characteristics and</p>	<p>Scheduled Monument 13318 (scheduled 2014) is within the site assessed in the ER. The MH15 site allocated in the LDP excludes this area. HES note the monument is close enough to this site so that its setting</p>	<p>The LDP site allocation was altered to avoid direct effects on Scheduled Monument 13318. Text was added to PM/MH/HSG055 Site Assessment “This area lies in part of Pinkie Battlefield which</p>

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	<p>special qualities as the ER recognises. Without mitigation, there is potential for development here to have a significant adverse impact.</p>	<p>should be considered. Comments on Pinkie Battlefield are noted.</p>	<p>contributes to its landscape characteristics and special qualities. Without mitigation, there is potential for development here to have a significant adverse impact.”</p> <p>No change to the scoring.</p>
<p>15</p>	<p>PS1 Longniddry PM/PP/HSG050 The allocation contains a number of listed buildings and is adjacent to Gosford House Garden and Designed Landscape. The boundary in the LDP is closer to the designed landscape than that assessed in the ER. Alterations to the boundary increase the possibility of impacts on its setting, though it is likely such impacts could be mitigated.</p>	<p>The area allocated in the LDP was reduced from that shown in the ER site assessment. This reduces potential effects on the nearby Gosford House Garden and Designed Landscape.</p>	<p>Additional text added to PM/PP/HSG050 Site Assessment cultural heritage section “Alterations to the boundary as in the LDP reduce the possibility of effects on its setting, though it is likely that such effects could be mitigated.”</p>
<p>16</p>	<p>PS2 Land at Dolphingstone North – PM/PP/HSG009 The ER identifies potential impacts on Pinkie Battlefield, and HES is content these are unlikely to be significant. Significant impacts on the setting of the adjacent Scheduled Monument appear unlikely.</p>	<p>Noted</p>	<p>No change requested.</p>

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17	<p>EGT1 – Former Cockenzie Power Station – PM/PP/OTH001</p> <p>The ER acknowledges that the southern part of the area contributes to the understanding of the Prestonpans battlefield, and development is not proposed here.</p>	Noted	No change requested.
18	<p>BW1 – Blindwells – PM/TT/OTH103</p> <p>The site is within the Prestonpans Battlefield. The ER assessment includes additional land at BW2 and to the north, and therefore identifies impacts which have already been mitigated through exclusion from the allocation. It also identifies impacts which are only relevant to BW2. The adopted Development Framework for the area contains appropriate mitigation.</p>	<p>Noted. Although the boundary of the assessment and the allocated site differ, no effects have been missed. The boundaries of the site allocated in the LDP were adjusted to mitigated landscape impact including on the local designed landscape of St Germain's.</p>	No change requested.
19	<p>BW2 Expansion area – PM/TT.OTH103, PM/TT/HSG004/PMOTH003</p> <p>The area contains Scheduled Monuments and Listed Buildings, and along with BW1 has the potential to impact on the setting of Seton Castle and its Inventory Garden and Designed Landscape. The ER assessment is given under a number of references, which together identify the impacts</p>	<p>It is noted that HES accept that together the site assessments cover the relevant assets. The site assessments were carried out on sites as submitted by the landowner in this instance.</p>	No change requested.

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	on these assets, as well as assets no longer within the boundary.		
20	<p>TT5 Bankpark Grove PM/TT/HSG076</p> <p>The ER identifies potential impacts on Prestonpans Battlefield and Tranent Conservation Area and the setting of the B listed parish church. The site contributes to the understanding of the battle through topography.</p>	Noted	No change requested.
21	<p>TT14 Park View, Easter Pencaitland PM/TT/HSG111</p> <p>Notes the ER acknowledges sensitive design will be required to minimise impacts on Winton House GDL and other assets.</p>	Noted	No change requested.
22	<p>TT16 Dryden Field East Saltoun – PM/TT/HSG012</p> <p>Notes the ER recognises development in this area has the potential to fundamentally change the character of the Conservation Area.</p>	Noted	<p>No change requested.</p> <p>See also Person 1 Point 1 and Hamilton Farming Enterprises Ltd Point 1 and HES Point 22.</p>

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23	<p>HN1 – Letham Mains – SDP/HN/HSG001</p> <p>HES agree with the ER statement that the existing development framework and current masterplan safeguards the setting of the Scheduled Monument.</p>	Noted	No change requested.
24	<p>DR1 – Hallhill South West</p> <p>This site has not been assessed in the ER. As the national inventory of battlefields was not in place in 2008, no SEA of this impact has previously been undertaken.</p>	<p>At DR1, planning application reference 09/00486/OUT has been granted which covers the site. Detailed applications relating to conditions including 14/00778/AMM, 12/00660/AMM have also been granted. 09/00623/FUL covering the central part of the site has been granted and construction has begun. This site therefore has planning permission and is part of the baseline.</p> <p>See comments at <i>HES Point 4 Allocations not assessed in the ER</i> above.</p>	No change.
25	<p>DR5 – Land at Newtonlees – SDP/DR/HSG008</p> <p>This site is within Dunbar 2 Battlefield and adjacent to Broxmouth Park GDL. The ER concludes significant impacts</p>	Noted	No change requested.

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	<p>on these assets are unlikely and HES concur, considering potential impacts can be mitigated by design.</p>		
<p>26</p>	<p>DR7 – Land at Spott Road – PM/DR/OTH10 HES note this site is within Dunbar II Battlefield and close to Broxmouth Park Garden and Designed Landscape. The ER identifies potential for impacts on Broxmouth Park GDL; HES are content this can be mitigated through design. It is unclear from the assessment what level of impacts are expected on the Dunbar II battlefield, as it is only stated that this area is removed from the main area of battle. This does not preclude the possibility of impacts on the asset as development would lie within its boundary. While it is likely that development could take place without significant impacts, further assessment is required to confirm this. HES consider the effect uncertain.</p> <p>HES welcomes that the DR7 Development Brief specifies avoidance of large or tall buildings in the higher parts of the site. This is likely to help avoid impacts on Broxmouth Park GDL. HES advise that specific reference is made to this in the Development Brief, as well as reference to mitigation of any significant impacts on Dunbar II Battlefield.</p>	<p>HES give the SEA site reference as PM/DR/OTH10 which covers part of LDP PROP DR5. The SEA site ref for LDP PROP DR7 is SDP/DR/PROPD7. The comments refer to LDP PROP DR7, and therefore the related site assessment SDP/DR/PROPD7.</p> <p>Additional text has been added to the site assessment to make clear there is the potential for significant effects on Dunbar II Battlefield.</p> <p>The effect is noted in the Site Assessment as uncertain, so this has not been altered.</p>	<p>Text added to SEA Site Assessment SDP/DR/PROPDR7</p> <p>“This does not preclude the possibility of effects on the asset as development would lie within its boundary. While it is likely that development could take place without significant effects, further assessment is required to confirm this.”</p>

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<p>27</p>	<p>NK1 – Mains Farm HES raise concerns over setting of North Berwick Law and potential for cumulative impact with any future proposed development especially to the east.</p>	<p>Response: This site was allocated in the previous plan. Planning application 13/00227/PPM was granted in 2014 for 420 houses, community facilities, open space, employment uses and associated infrastructure. The Development Framework for this site has been subject to SEA. The comment does not seem to be related to NK1 alone but to ‘further development’ to the east which is assessed separately, including cumulative effects.</p> <p>See comments at <i>HES Point 4 Allocations not assessed in the ER</i> above.</p>	<p>No change.</p>
<p>28</p>	<p>NK10 Aberlady West – PM/NK/HSG116 Notes the ER acknowledges potential impacts on Aberlady Conservation Area and Gosford GDL.</p>	<p>Noted</p>	<p>No change requested.</p>

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29	<p>NK11 – Castlemains, Dirleton – PM/NK/HSG048</p> <p>Notes the ER acknowledges potentially significant impacts on Dirleton Castle and for fundamental change to the character of the Conservation Area.</p>	Noted	No change requested.
30	<p>OS5 – Potential Cemetery Extensions</p> <p>HES have previously advised on three allocations and are content that this is reflected in the ER.</p>	Noted	No change requested.
SNH			
1	<p>SEA of Aims and Objectives</p> <p>SNH consider that very positive outcomes could be achieved but it is difficult to confirm this as it is heavily reliant on mitigation delivered through individual developments. Changes to the draft Development Briefs would reduce the chance of relevant SEA objectives being met.</p>	<p>Comments on this section are noted. The assessment is of the Aims and Objectives themselves, which by their nature are aspirational. SNH do not appear to be suggesting a change to the assessment but attention to implementation and change to the development briefs.</p>	No change.
2	<p>SEA of Sustainability and Climate change</p> <p>An approach where sustainability and climate change are embedded in Spatial Strategy is expected to lead to positive effects.</p>	<p>The ER assesses the effect of embedding sustainability and climate change into the Spatial Strategy as neutral. The Town and Country Planning (Scotland) Act 1997 as</p>	No change.

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		<p>amended requires planning authorities to carry out their development planning functions with the aim of contributing to sustainable development. The Climate Change (Scotland) Act 2009 places a duty on public bodies to act in the way best calculated to contribute to the delivery of the Acts emissions reduction targets, and in the way, it considers most sustainable. SPP states that all planning decision should contribute to the reduction of greenhouse gas emissions in line with targets. SPP sets out the Core Values of the planning service, including that it plays a key role in facilitating sustainable economic growth. Sustainability and climate change mitigation therefore run through planning decisions regardless of whether the approach is embedded in the plan or explicitly considered. The effect of this approach is therefore considered neutral.</p>	
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3	<p>SEA of Town Centres On Town Centres, Biodiversity sub-objectives B2 and B3 are expected to be positive, especially if the new town centre(s) at Blindwells are fully integrated into their surroundings. H1 and H2 would also then be positive.</p>	<p>The strategy approach of maintaining a hierarchy of centres and establishing a new centre at Blindwells is concerned mainly with encouraging appropriate uses in town centres. Details of the relationship of the proposed Blindwells centre including its effect on accessibility to open space or the CSGN is addressed through masterplanning. The effect of this on sub-objectives B2 and B3 are therefore considered neutral, as there is no direct adverse impact on designated sites or wider habitat connectivity. The scoring of H1 or H2 is considered correct as the effects are uncertain.</p>	<p>No change.</p>
4	<p>SEA of Green Belt, Cumulative assessment and Green Network On the sections on Green Belt and cumulative assessment, a clear expression of requirements for individual allocations is needed if positive outcomes are to be achieved for biodiversity and landscape sub-objectives. SNH considers this more likely with Policies DC8, DC10 and NH1 – NH9 in place as well as the Development Briefs. On the Green Network, to achieve the positive outcomes identified in this</p>	<p>Noted. Comments on the Green Network apply more to implementation of policy than the SEA itself. If the policies operate as intended the effect would be positive. The Council intends to introduce Supplementary Planning Guidance on</p>	<p>No change.</p>

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	<p>assessment, a structured approach to the Green Network will be required.</p>	<p>the Green Network to support positive outcomes.</p>	
5	<p><i>SEA of Development in the Countryside and Coast</i> On Development in the Countryside and Coast, the narrative of the assessment needs explanation that is more robust. It is not clear why “current policy emphasis on reuse/redevelopment of existing vernacular buildings” would be undermined by the development of affordable housing in particular. SNH agrees with the scores for the landscape sub-objectives.</p>	<p>Comments on Development in the Countryside and Coast are noted. The scores were applied as the approach potentially could allow more new build in these areas than previously, despite policies on the Countryside and Coast being protective. This is because without them a greater amount of development would be possible and the re-use of land and buildings may become less favoured under such a policy approach, irrespective of development type or tenure, than an approach that prioritises the reuse of such an asset. The assessment notes that relaxation of previous countryside policy towards housing to modestly increase the scope for new build affordable housing, replacement dwellings and enabling housing development is likely to undermine the aim of re-</p>	<p>Further text added to section on Development in the Countryside and Coast section, comment box at page 157 “This is because increasing the availability of any alternative housing in the countryside (in this case affordable housing) could reduce the incentive to reuse existing vernacular buildings”</p>

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		using existing buildings. It is logical that this impact could result from increasing the availability of alternative housing in the countryside for those wishing to live there.	
6	<p>SEA of Energy and Minerals</p> <p>On the LDP strategy for Energy, regarding Cockenzie, SNH agrees that the status and impacts of different potential uses of the site differ and that the effects on biodiversity are generally unknown at present. It is also reasonable to state (as the ER does) that landscape effects are likely to be negative. SNH agrees with the assessment of renewable energy. SNH re-states comment on the alternative approach to energy and the preferred approach to minerals in the Interim Environmental Report.</p>	Noted	No change requested.
	<p>Mitigation section of SEA</p> <p>On mitigation, SNH generally agrees with the conclusions of the draft Habitat Regulations Assessment Record however a small number of allocations will require project level HRA.</p>	Proposals where HRA will be required are noted in the plan. Regardless of whether they are noted or not, the Regulations would still apply.	No change.

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7	<p>SEA Site Assessments SNH commends the approach to individual site assessments. However, differences in site referencing between the LDP and the ER lead to difficulties.</p>	<p>On site assessment, although maps are included for clarity it is considered helpful to include LDP site and policy references in the site assessments.</p>	<p>LDP references have been added to the assessments.</p>
<p>SEPA</p>			
1	<p>Introductory comments SEPA are impressed with the thoroughness of the ER in relation to SEPA's interests, and the site assessments.</p> <p>The water environment is assessed as one issue (containing both flood risk and ecological status) which could mask an adverse impact.</p> <p>No table of abbreviations has been included.</p>	<p>Comments in support of the ER are noted.</p> <p>On scoring, the SEA topics are set out by legislation and it is considered a valid approach to treat each as one issue, as with the historic environment (see HES 4 above). There is scope within the methodology to give two plus/minus scores for an impact, reflecting a proposal could have different effects on different aspects of the water environment. Reasoning is given in the accompanying text. Reading the score and the text together is considered sufficiently clear; the Red/Amber/Green and plus/minus</p>	<p>A Table of Abbreviations has been added.</p>

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		<p>scoring are intended as a 'quick reference'.</p> <p>The method for giving SEA score and planning assessment values has been set out at the start of the assessment.</p> <p>A Table of Abbreviations is a useful addition.</p>	
2	<p>Table B: Key Environmental Issues This table provides an important choice of the LDP regarding the impact of development options.</p>	Noted	No change requested.
3	<p>Table D: Cumulative Assessment of the Proposed Spatial Strategy approaches and SEA of Development Locations (Q6) The tables show further housing and employment sites in each cluster area which are not shown on the spatial strategy drawings, but mostly are on the Proposals Map. Policies HOU1 and EMP1 are significant allocation policies which bring forward a number of "established" development sites from previous local plan regimes and/or grant of planning permission. Some of these sites have not been site assessed. SEPA do not support this approach. These sites have not been fully assessed under the most up</p>	<p>See comments at <i>HES Point 4 Allocations not assessed in the ER</i> above.</p>	No change.

<p>to date legislation, regulation and guidance which inform the decisions to develop sites into the future.</p> <p>It is not clear how the distinction has been made, but it appears that those with planning permission and those which have been allocated under the previous plan have not been fully considered. SEPA have not had an opportunity to comment on these sites previously during the preparation of the LDP. The majority of these sites have not been assessed by the SFRA and requirement for FRA has not been included in the proposed LDP.</p> <p>As less consideration of flood risk has been given to these sites, it is not possible to establish the principle of development there. This should inform the decisions to allocate these sites into the future. This approach to site allocation undermines the transparency of the LDP process.</p>		
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4	<p>Key messages: Flooding Commends the identification of the role the LDP can plan in avoiding flood risk. However, SEPA note that the Key Message Water (Flooding) paragraph states that “with its criteria based policies it can help ensure that the design and layout of buildings respond to flood risk where necessary”. This approach does not fully comply with the strategy of flood avoidance of SEPA and the LDP. Therefore, SEPA request that the word “respond” be amended to “avoid”.</p>	<p>It is accepted that this change would make the ER clearer.</p>	<p>The words “respond to” are changed to “avoid” in paragraph 3.1.3 “Key Messages: Water (Flooding)” – second sentence.</p>
5	<p>Key Messages: Climatic Factors SEPA commend the inclusion of this information. It is important that these policy principles be applied in development management decisions.</p>	<p>Noted</p>	<p>No change requested.</p>
6	<p>Material Assets: Water and Drainage Capacity Inclusion of this information is valuable. The ER states that sometimes private waste water treatment may be needed. Note this may not always be acceptable to SEPA.</p>	<p>This is helpful clarification.</p>	<p>Text added to last sentence of section 3.2.7 Material Assets: Water and Drainage Capacity so that it reads: “Early engagement with SEPA to discuss the specific requirements and approval of any private systems is essential; use of private wastewater”</p>

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			treatment systems may not always be acceptable to SEPA.”
7	<p>Current State of the Environment (Q1) Key Environmental Issues (Q2), Evolution of the Baseline without the LDP (Q3)</p> <p>Agree that information in the Current State of the Environment is sufficient and appropriate, that the key issues are identified, and appreciates linkages between topics.</p>	Noted	No change requested.
8	<p>SEA of Aims & Objectives for the LDP (Q4), SEA of Sustainability & Climate Change (Q5)</p> <p>The SEA is appropriate.</p>	Noted	No change requested.
9	<p>SEA of Development Locations (Q6)</p> <p>The SEA of the preferred approach is generally appropriate.</p> <p>(see also SEPA Point 3 above for comments on established sites).</p>	Noted.	No change.
10	<p>SEA of Town Centres (Q8 and Q9)</p> <p>The SEA of the proposed approach is appropriate. However, dense town centre development could possibly lead to deterioration of air quality. The assessment including of a</p>	The point on effects on Air Quality from dense town centre development is recognised.	A sentence has been added to the LDP approach in Town Centres: Comment (air quality) stating “Dense Town Centre

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	<p>new town centre at Blindwells, is given as neutral overall on the water environment. This depends on a number of actions and circumstances. There are flooding issues associated with the Seton Burn and Blindwells development must not increase the risk of flooding downstream. Groundwater flood risk could be an issue, though currently controlled. FRA for this site has to take account of changes from mining activity, with no increase in runoff rates downstream. At present flood risk and surface water management might be achievable but climate change and reliance on pumping by a third part may challenge this long term.</p>	<p>Flooding: Issues of flooding on the Seton Burn are not noted here in the draft ER however this is considered in the Site Assessments for PM/TT/OTH103 and others, so the effect has been identified. The LDP proposal requires Flood Risk Assessment to be submitted. Flood Risk Assessment (noted in the mitigation section) will be/has been carried out at project level. The effect has been identified in the ER and will be addressed in full through site specific assessment. Some changes have been made to the text to reflect the position at Blindwells.</p>	<p>development could possibly lead to deterioration of air quality.”</p> <p>Text added in Town Centres section to both the LDP Strategy Approach and the Reasonable Alternative regarding Blindwells: “There are flooding issues associated with the Seton Burn and Blindwells; groundwater flood risk is currently controlled but climate change and reliance on pumping may challenge this long term.”</p>
11	<p>SEA of Planning for Employment (Q10 and 11) The SEA of the preferred approach is appropriate and agrees there would be a neutral (in some cases positive) effect on the water environment subject if the detail in the site specific assessments are taken forward and incorporated in the LDP.</p>	<p>Noted.</p>	<p>No change requested.</p>

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<p>12</p>	<p>SEA of Planning for Housing (Q12 and Q13) The preferred approach is appropriate, however as noted above the ‘water environment’ assessment continues to combine flood risk and ecological status considerations, leading to a ‘neutral’ score. Notes there are issues of flooding associated with the Seton Burn and that development must not increase the risk of flooding downstream. Groundwater flood risk could be an issue, but currently this is controlled by pumping by the Coal Authority. Flood Risk Assessment must include changes from mining activity; there should be no increase in runoff rates downstream. Climate change and reliance on third party pumping may challenge sustainability of large development in the longer term.</p> <p>(see also SEPA Point 3 above).</p>	<p>The Council notes comments on separating flood risk and ecological status considerations in the scoring for the water environment and has commented above (SEPA Point 1).</p> <p>Neither the SEA section on Planning for Housing nor the SEA section on Town Centres includes issues of flooding on the Seton Burn, however this is considered in the Site Assessments for PM/TT/OTH103 and others, so the effect has been identified and the LDP proposal requires a flood risk assessment to be submitted. Flood Risk Assessment will be / has been carried out at project level. No change to the ER is required.</p>	<p>Text added to both the LDP Strategy and the Reasonable Alternative Planning For Housing: Comment: Water “There are flooding issues associated with the Seton Burn and Blindwells; groundwater flood risk is currently controlled but climate change and reliance on pumping may challenge this long term.”</p>
<p>13</p>	<p>SEA of Green Belt and Countryside Around Towns (Q14 – Q19). The SEA is appropriate. However, SEPA are not certain about the conclusions of impact on the water environment. In assessing removals from the Green Belt loss of water storage potential should be considered. For the alternative</p>	<p>The Council notes that SEPA considers the SEA to be appropriate on this topic. Removal of sites from the Green Belt will not per se affect storage. The plan contains policies on SUDS for development proposals which should mean the effect of</p>	<p>No change</p>

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	<p>approach there are also impacts to human health via poorer air quality as well as to climate change as identified.</p>	<p>development is neutral. Also, effects on flood risk are site specific and would be addressed at project level; overall, this is not just an issue for the Green Belt. The narrative captures potential effects on human health through air quality effects as noted.</p>	
<p>14</p>	<p>Central Scotland Green Network (Q18 and Q19) The SEA of the both approaches is appropriate. The potential for positive benefits to the water environment could be explored further. For the alternative approach the assessment identifies that the lack of detail in the Supplementary Guidance could limit the potential for CSGN to lead to enhancements.</p>	<p>It is noted that the SEA is appropriate. It is agreed that further text could be added on the potential for positive benefits to the water environment.</p>	<p>Changes to text of first sentence of Central Scotland Green Network assessment: Comment: Water so that it now reads: “The Central Scotland Green Network could improve habitats with benefits for the ecological quality of the water environment, as well as enhancing its recreational value and helping to manage flood risk by safeguarding some areas from built development and also allowing them to become multifunctional green spaces.” Changes to Water Environment scoring to a positive impact in</p>

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			Table here and summary Table D.
	<p>Development in the Countryside & on the Coast (Q20 and Q21)</p> <p>The SEA of the preferred approach is appropriate, though there could be a more emphasis on avoiding development where there is a risk of coastal flooding. The SEA of the alternative approach is appropriate however individual or small groups of housing in the countryside are likely not to be in areas served by the Scottish Water sewer network, which could affect the quality of the water environment. There is therefore the potential for a negative impact on the water environment.</p>	<p>For the preferred approach, policy on flooding is intended to avoid development where there is a risk of coastal flooding. Although the policy on the coast restricts development in some cases, it will not affect the amount of property at risk of flooding as this would be controlled by policy on flooding. Avoidance of coastal flooding should therefore not be reflected in the assessment of this section. Policy NH9 on the Water Environment provides that development proposals that would have a detrimental impact on the water environment will not be supported. Advice Box 6 notes that developments should be connected to the public sewer where possible. At project level, SEPA will be consulted. If there is likely to be a detrimental impact on the water environment, this should be identified at the time and assessed against relevant LDP</p>	No change

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		<p>policy and if necessary planning permission should be subject to conditions or refused. A negative effect is not a reasonably foreseeable outcome, so the impact is considered to be correctly assessed as neutral.</p>	
15	<p>Cumulative Assessment of Preferred Spatial Strategy Approaches (Q22). The SEA of the preferred approach is considered generally appropriate however it is still uncertain if the ‘positive’ scoring identifies an enhancement or a least negative outcome.</p> <p>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.</p> <p>The ER predicts neutral impact on the water environment. 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</p>	<p>Re scoring: the ER makes clear it is a comparative assessment overall. Negative and positive scores are given based on the assessment questions which are used as prompts. This is explained on page 85 with reference to Appendix 2, which contains the assessment questions. Whether a positive score represents an enhancement or avoidance of a negative effect varies between and sometimes within topics. For example, for Population Assessment Question 1 is “would the strategic option maintain or enhance contribute to the regeneration of a disadvantaged area”. A positive score would therefore indicate an improvement. However for Soil, the first assessment question is “Would</p>	<p>No change: extra text for clarification was added to Section 5.1: Background and Methodology previously, no further text is added.</p>

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<p>score. If the LDP were to assure no increase flood risk, then there is a neutral impact. If, as is possible, there are improvements leading to enhanced ecological status there is a positive impact.</p> <p>The scoring is undermined by the failure to fully consider HOU1 sites, including identifying appropriate mitigation and developer requirements; development impacts cannot be fully accounted for as part of the SEA.</p>	<p>the sites development ensure that prime agricultural land is not lost". A positive score here would indicate a neutral outcome ('least bad'). This variability in scoring is considered necessary to allow comparison between options. For example in the case of Soil, it is not possible to create prime agricultural land, so all options would be negative or neutral, which could obscure differences between options. With the scoring, the important point is that it allows easier comparison to be made between the different options. The actual outcome is described in the text, and can be further explored by reference to the assessment questions.</p> <p>This approach is considered to be effective and no change to the ER is required.</p> <p>Air quality is scored as negative due to expected increases in traffic. Although the aim of the strategy overall is to minimise the increase, it</p>	
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		<p>is nonetheless recognised there is likely to be an increase. Although mitigation is proposed where air quality standards are currently, or risk, being breached the plan <i>overall</i> will not maintain or enhance current levels of air quality, and this is recognised in the negative score. This is considered correct. The scoring on human health is wider than air quality issues alone, and includes access to open space, enhancing the CSGN, noise issues. An overall positive impact is considered correct.</p> <p>The assessment of the water environment notes that the proposed strategy avoids areas of flood risk and that plan policies ensure the risk of flooding is not increased as a result of new development in the area, and that SUDS are required. The policies of the plan also provide that the ecological status of the water environment is maintained or enhanced. Mitigation of proposals is currently unknown, and while it is</p>	
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		<p>hoped they would improve the ecological status of the water environment this should not be relied upon; a positive score would therefore be inappropriate.</p> <p>Policies on flooding will apply equally to all sites (i.e. including HOU1 sites). Assessment on the water environment was carried out for SESPlan Housing Land Supplementary Guidance, which confirmed the carry forward of these sites. The results were that the impact was neutral, it being considered that although there was potential for negative effects, it must be considered that legislation and LDP level input would prevent negative effects occurring. A secondary impact was identified that soil sealing due to development on greenfield land has the potential to impact on flooding incidents as water cannot soak away.</p> <p>For East Lothian, the SEA environmental objective for Water in</p>	
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		<p>the Supplementary Guidance was “To avoid creation of flood risk and adverse significant effects on water bodies from effects as a result of additional or re-phased allocations”. The assessment against this objective was “Even without knowing the exact location of additional and re-phased allocations it is considered that LDP work will avoid areas of known flood risk. In addition existing legislation and policy which seeks to promote and protect the water environment will help avoid negative effects. As a result the assessment is judged to be neutral”. Development effects will be addressed at the project level. A neutral score is justified. No change to the ER is required.</p>	
16	<p>Cumulative Assessment of Alternative Spatial Strategy Approaches (Q23) The SEA of the preferred approach is generally appropriate, however see response to Q22 above.</p> <p>Dispersed growth could lead to development in non-sewered areas or where there are sewage capacity issues.</p>	<p>All development sites would be required to comply with legislation on the water environment. The alternative strategy would not have resulted in development in non-sewered areas (or areas where a sewer connection could be</p>	<p>No change.</p>

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	<p>This could lead to additional pressure on the water environment. However, such development could also lead to sewage capacity improvements with a positive impact.</p> <p>This strategy would also incur increased CO2 emissions, as the ER recognises.</p>	<p>provided) – such developments tend to be small scale and arise through planning application rather than through allocation in the LDP. Further development at North Berwick could have triggered improvements to the WWTW. At Dunbar, there is a WWTW already. Overall, it is considered that the effect (as far as predictable) is likely to be neutral.</p>	
17	<p>SEA of Developer Contributions (Q24 and Q25) There is a need for site specific flood risk assessments to accompany and inform planning applications for several sites.</p>	<p>The requirement for Flood Risk Assessment will be considered at project level. This is not a developer contribution issue.</p>	No change
18	<p>SEA of Affordable Housing (Q26 and Q27) The SEA approach is appropriate.</p>	Noted	No change requested.
19	<p>Energy, Including Renewable Energy (Q28 and Q29) The SEA of the preferred approach is appropriate. However, SEPA re-state their view Policy SEH1 on district heating networks fails to comply with SPP and omits reference to specific locations for this. This leads to significant</p>	<p>A neutral score is justified. This assessment takes in wind energy, LZCGT proposals and policy towards thermal generation at Cockenzie (insofar as it is attributable to the LDP), not just policy towards heat networks, which are a small part of</p>	No change

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	uncertainties regard to the identification of a neutral impact on air and climate.	the overall assessment. The policy is supportive	
20	<p>Minerals, Including Aggregates & Coal (Q30)</p> <p>The SEA of the preferred approach is appropriate though previous comments on scoring and amalgamating flood risk and ecological status are relevant. If the plan is altered to the reasonable alternative, impacts to (and from) ground water and mine waste water, and implications for increased flood risk and deterioration of ecological status should be assessed.</p>	Noted. The reasonable alternative was not followed, so this is not necessary.	No change.
21	<p>SEA of Waste (Q32 and 33)</p> <p>The SEA of approaches are appropriate, though there is the potential for some positive outcomes if waste was linked more closely to the energy section of the assessment, such as energy from waste and district heating systems.</p>	Noted.	No change
22	<p>Mitigation (Q34)</p> <p>The proposed mitigation measures are sufficient and appropriate. They could usefully be developed in greater detail.</p>	It is not proposed to develop mitigation in greater detail at this stage. SEPA do not suggest anything specific that is missing. Mitigation of	No change

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		effects will also be considered at project level.	
23	<p><i>Monitoring (Q35)</i></p> <p>SEPA agree that it is challenging to identify relevant, affordable monitoring indicators. This could be the subject of further joint working with SEPA and others.</p>	Noted. The idea of joint working on indicators could be usefully explored and the Council thank SEPA for the suggestion. However, this is currently too speculative to include in the ER as mitigation.	No change.
24	<p><i>Site Assessments (Appendices 5 – 9) (Q37)</i></p> <p>The detail of the Site Assessments has allowed the identification and removal of unsuitable sites, which is a positive use of SEA and their thoroughness is commended.</p> <p>See also comments at SEPA Point 3 above.</p> <p>There are inconsistencies between the Site Assessments and the SFRA. This undermines the reliability of the Site Assessments.</p>	Comments on detail and use of Sites Assessments is welcomed.	<p>Text added to site assessment PM/MH/HSG008 for MH10: Land at Dolphingstone: “Development at this site could increase the probability of flooding elsewhere; there are known issues of flooding at Goshen, downstream of site.”</p> <p>Text added to Site Assessment PM/MH/HSG024: Water “The site is within Potentially Vulnerable Area 10/21.”</p> <p>Text added to Site Assessment PM/TT/HSG079, PM/TT/HSG080 and PM/TT/081: Water “SEPA note development at the PROP</p>

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			<p>TT2 part of the site could potentially increase the probability of flooding elsewhere”.</p> <p>Text deleted from the same sections of PM/TT/HSG079, PM/TT/HSG080 and PM/TT/HSG081 as follows “SEPA has not raised any concerns with regards to flood risk or potential impact on the water environment”</p> <p>Text added to site assessment SDP/DR/HSG007: Water as shown:</p> <p>“Small areas of the site including the majority of PROP DR3 are also shown to be at risk of surface water flooding.” The following sentences are added to the end of the section “SEPA also note with regard to the PROP DR3 area that there are a number of small drains in the</p>
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			area and these may be culverted through the site although they have no details. Should culverted watercourses be located on site then there should be no development over the top of them.”
25	Other Comments (Q 38) SEPA will be more that satisfied if the amendments outlined in this response are made.	Noted	No change requested
26	Other Relevant Plans, Policies & Strategies. On page 204, the “Flood Risk Management (Scotland) Bill 2008 (as introduced)” should be replaced with “The Flood Risk Management (Scotland) Act 2009”. PAN 69 as referenced in Appendix 1 Other Relevant Plans Policies and Strategies has now been replaced by the Scottish Government Online Planning Advice on Flood Risk.	The updates to relevant legislation and guidance are noted and have been updated however this does not affect the outcome of the assessment. The Flood Risk Management Scotland Bill was updated at Draft ER stage. The update regarding PAN 69 is noted and has been included.	Updated PAN 69 to reference Scottish Government online advice. The reference to the Flood Risk Management (Scotland) Act 2009 is also updated.
Gullane Community Council			
1	The SEA did not undertake a cumulative assessment of the impact of the allocation of all 4 sites (Proposal NK6 Former Fire Training School, PROP NK7 Saltcoats, PROP NK8	The purpose of the SEA is to identify the significant effects of the plan overall. An overall cumulative assessment of the plan on each of the	No change

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<p>Fentoun Gait East and PROP NK9 Fenton Gait South) at Gullane.</p>	<p>SEA topics was carried out and shows where the plan is expected to have a particular effect cumulatively. The Environmental Report is also clear that it is a guide in the plan making process (page 9 paragraph 2). The approach used to carry out the SEA is explained at Section 5.1 of the Environmental Report (paragraph 9 – 11). The LDP has been split into four parts to be assessed, namely the aims and objectives for the LDP, the Spatial Strategy, the Policy approaches and proposed sites. When taken together these sections provide the overall strategic environmental assessment of the emerging LDP. Site assessments were included to ensure that no significant effect was missed at the most local level and to aid site selection and mitigation. This is not required by legislation and few LDP SEAs do in fact include this. The purpose of the SEA is to consider the effects on the environment, taking into account the factors listed</p>	
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		(biodiversity, fauna, flora, air, water &c). It is not to examine the economic or social effects of the plan other than insofar as they impact on the environmental receptors.	
Dunpender Community Council			
1	<p>Current State of the Environment Does not consider that the ER provides sufficient and appropriate information on current state of the environment. Changes could be made to landscape, biodiversity and cultural heritage assessments to more clearly identify the situation on the ground. The key issues are those identified but are too broad brush to be applied at local level.</p>	<p>The Council notes comments on the current state of the environment and that the Community Council does not suggest specific areas that have been missed or what is required to more clearly identify the situation on the ground. The purpose of the ER is to identify and describe the main effects of the plan at strategic level. The Site Assessments support and inform this process. The purpose of them is to identify significant effects and cumulative trends, they are not intended to replicate project level studies for particular proposal. It is not clear exactly what changes are being sought.</p>	No change.

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2	<p>SEA Approach Agrees with the approach taken by the SEA other than as set out elsewhere in the response.</p>	Noted	No change
3	<p>Development locations In relation to development locations a more specific approach should be taken when assessing local issues for development locations</p>	<p>The purpose of the SEA is to identify the significant effects of the plan on the environment, and not to identify every impact at a project level. The site assessments do provide a detailed examination of potential effects locally.</p>	No change
4	<p>Planning for housing The proposed approach for planning for housing is not suitable as landscaping should be more rigorously assessed especially when large-scale developments (25+units) are proposed. The land adjacent to East Linton and allocated as having potential for housing development should be reassessed as DC8.</p>	<p>Effects on landscape were considered by ELC Landscape Officers, with SNH also providing comments through formal and informal consultation prior to the publication of the draft ER. Landscape issues will be addressed more specifically at the project level. Assessment of Policy DC8 and the impact of the application of that policy has been carried out in the ER section on DC8. Site assessment for specific pieces of land covered by that policy has not been carried out as this policy does not promoted change</p>	No change

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5	<p>Green Belt Disagrees with the proposed approach to Green Belt as too much green belt is being built on already; priority should be given to appropriate brownfield sites</p>	<p>The LDP gives priority to appropriate brownfield sites and provides appropriate protection for the Green Belt. It is not clear how this comment relates to the ER or what if any changes to this document are envisaged.</p>	<p>No change</p>
6	<p>Countryside Around Towns Disagrees with the proposed SEA approach for CAT as environmental, landscaping and cultural/heritage assessments need to be much more stringent to protect the immediate environment we live in.</p>	<p>The SEA took into account comments from ELC Landscape and Heritage Officers, as well as comments through formal and informal consultation with SNH, HES and SEPA. The assessment is intended to examine the effects of the policy while it is the policy itself that protects the environment. It is not clear what further assessment is envisaged.</p>	<p>No change</p>
7	<p>CSGN Agrees with the approach to SEA of CSGN but with the caveat that greater protection should be given to greenbelt rather than losing it to development</p>	<p>Noted; the assessment is intended to examine the impact of the CSGN policy and not to protect greenbelt.</p>	<p>No change</p>

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8	<p>Cumulative Assessment of Proposed & Alternative Spatial Strategy Agrees with the Cumulative Assessment of proposed & alternative Spatial Strategy Approaches but only if localised assessments are stringently applied.</p>	<p>Noted: where the need for mitigation is noted in the assessments this has fed into Development Briefs where these have been prepared. The application of matters noted in the assessments is a matter for project level decision.</p>	<p>No change</p>
9	<p>Developer Contributions Agrees with the proposed approach to SEA of developer contributions provided SUDS area adoption/handover of new developments is addressed before developer walks away.</p>	<p>The SEA of developer contributions considers the impact of the policy. The assessment assumes that it will be applied as set out in the policy and associated Supplementary Guidance. SUDS area adoption and handover of new development will be addressed at the project level.</p>	<p>No change</p>
10	<p>Affordable Housing Does not agree with the proposed approach to SEA for affordable housing as more affordable housing for younger and elderly people is required. "Luxury build" only developments should not be considered.</p>	<p>The plan does not specify 'luxury build' housing and policy on density aims to avoid designs with only detached houses (as this would be difficult to achieve while meeting density targets) which should lead to a greater variety of house types within a site. The plan specifies an affordable housing requirement for larger sites. It is not clear how the</p>	<p>No change</p>

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		approach to SEA on this topic is intended to be changed.	
11	<p>Mitigation Does not agree that proposed mitigation measures are sufficient and appropriate.</p>	The Community Council has not specified where mitigation measures should be improved. Mitigation has included policies of the plan, alteration of site boundaries, developer contributions and requirements for design of specific sites. It is considered that mitigation as set out in the ER is sufficient.	No change
12	<p>Limitations of SEA Agrees that the draft ER provides an accurate description of the limitations of a SEA of a LDP overall the report provides the minimum required. More detailed and thorough assessment of individual areas of development are needed.</p>	The ER has given extensive assessment of individual sites given that the assessment is of the plan overall. Where Environmental Impact Assessment is required for particular developments, any planning application will be accompanied by an Environment Statement, which will provide further detailed information. Where EIA is not required, further information where required will be sought through the planning application process. The purpose of the site assessments was to identify	No change

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		<p>the main environmental effects of the development of the site for the proposed use, especially where this had the potential to be significant in the context of the LDP as a whole. Further detailed assessment will be carried out at project level.</p>	
13	<p>Dunbar Area Assessment The East Linton "site search" assessment is far too vague and should be dropped. The assessment of the Pencraig/Orchardfield site should be changed to "DC8" to reflect the area surrounding and adjacent to it.</p>	<p>The assessment of the East Linton 'site search' was included in the ER to reflect its inclusion as an 'Other' option in the MIR. It was an option that was considered, and is therefore rightly included and assessed as an option in the ER. The site assessment of the Pencraig/Orchardfield site should remain in the ER as this site is proposed for development within the LDP.</p>	<p>No change</p>
<p>RSPB</p>			
1	<p>Flooding (page 33) Although the threat posed by fluvial flooding is low, natural flood management should be used where possible in conjunction as necessary with 'hard' flood defences and should include native tree planting on the River Tyne.</p>	<p>The LDP contains Advice Box 6, a presumption against unnecessary engineering in the water environment. Different flood risk management measures are properly considered through the Flood Risk</p>	<p>No change.</p>

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		Management Plan and strategies rather than the LDP. The page referred to contains descriptive information: this appears to be a comment on policy rather than seeking change to the ER.	
2	<p>Natural Heritage ((3.2.5 page 39) The identification and designation of Local Biodiversity sites (LBS) in East Lothian should be expedited so that the remaining important natural habitats and features of the county can be effectively conserved and protected against inappropriate development.</p>	<p>The proposed LDP designates Local Biodiversity Sites through Policy NH3. PROP MH18: Levenhall Links to Prestonpans: Area for Habitat Improvement proposes that the Council will continue to manage this land to improve the availability of suitable habitat for qualifying interests of the Firth of Forth SPA. This is a policy comment.</p>	No change.
3	<p>SEA of Planning for Housing (Q12) RSPB agrees that housing could be accommodated in the west of East Lothian without a negative impact on the Firth of Forth SPA, though this would require rigorous assessment including Habitat Regulation Assessment (HRA). Increased usage of Levenhall Links could impact the qualifying interest of the SPA. The Lagoons complex should therefore include measure to avoid this. Increased housing at Dunbar is likely to result in increased usage of the coast</p>	<p>Where HRA is predicted to be required this is noted in the LDP. The regulations apply regardless of whether this is noted or not however. The potential for recreational disturbance arising from increased population has been considered in the HRA of the LDP. The HRA does not identify an issue for this LDP here. It</p>	No change.

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<p>to the east; creation of wildlife habitats at Oxwellmains should therefore be a high priority.</p>	<p>may be considered in a subsequent Plan. Mitigation for potential effects of the LDP has been identified (policy wording changes to some proposals to ensure the need for Habitats Regulations Assessment is considered: allocation of land for habitat improvement at MH18: Levenhall Links to Prestonpans. Mitigation will be further considered at project level. Land at Oxwellmains is in private ownership and any proposals there will be considered against relevant LDP policy. It is not clear what if any changes to the ER are intended. HRA has been carried out. Embedded mitigation has been added to the plan through adding Proposal MH18, which provides for the management of an area around the Musselburgh Lagoons for wildlife. The comment on Oxwellmains is a policy comment not a comment on the ER.</p>	
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4	<p>SEA of CSGN (Q18) RSPB commends the adoption of and involvement in the CGSN and the aim to have a positive effect on biodiversity.</p>	Noted	No change requested
5	<p>SEA of Developer Contributions (Q24) No mention is made of developer contributions to environmental mitigation or enhancement. Developers should be obliged to make provision for the enhancement of natural features and biodiversity within developments, or if that is not possible, elsewhere.</p>	<p>Mitigation is provided for through Natural Heritage policies. This will be secured at project level as appropriate. The Developer contributions Framework page 1.24 is clear that environmental mitigation can be subject to developer contributions at project level. It is not clear what if any change the RSPB intends to the ER. This is a comment on policy not the ER.</p>	No change.
6	<p>SEA of Energy, including Renewable Energy (Q28) RSPB would not support construction of thermal energy generation at Cockerzie. There would be potential impacts on qualifying species of the Firth of Forth SPA and impacts on CO₂ emissions, and consequently on biodiversity. The impact is predicted to have a 'neutral' effect on climate. The aim should be to have a positive effect i.e. reduction of CO₂ emissions.</p>	<p>The requirement to safeguard Cockerzie site for thermal generation arises from National Planning Framework 3. The LDP should conform to this document. The effects from the safeguard for this use do not therefore arise from the proposed LDP but from a higher tier plan, which has undergone SEA. The</p>	No change.

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		<p>need for HRA is highlighted in Proposal EGT1: Land at Former Cockenzie Power Station. One of the aims of the LDP is to contribute to climate change objectives; to have a positive effect through reduction of CO2 emissions through 'low carbon' energy generation. However the effect as assessed through the ER is neutral. This assessment considers the impact of the Energy policies overall, including wind policy, community heat, and LZCGT.</p>	
7	<p>SEA of Minerals, Including Aggregates and Coal (Q30) RSPB support not identifying a search area for opencast coal, as expansion is incompatible with the climate change targets. Failures relating to restoration is a serious concern. RSPB is concerned about the potential climate change impacts and cumulative impact on wildlife of the development of unconventional gas. There is also risk to the water environment and of methane release.</p>	<p>The ER identifies an uncertain impact on biodiversity, and notes uncertainties over the details of project level restoration proposals is one of the reasons for this uncertainty. LDP Policy MIN 10: Restoration and Aftercare would however be relevant and aims to mitigate against failure of restoration The ER predicts a neutral impact on the water environment as the LDP Policy NH9 aims to ensure that</p>	<p>No change</p>

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		<p>ecological status is maintained and flood risk avoided.</p> <p>Scottish Planning Policy does not allow for a blanket prohibition on unconventional oil and gas proposals. LDP Policy MIN7 and MIN8 aim to mitigate effects of any onshore oil and gas development which come forward, though Scottish Ministers do not currently support development of unconventional oil and gas in Scotland (see Letter from the Chief Planner to Heads of Planning Scotland dated 3 October 2017¹⁰)</p>	
8	<p>SEA Appendix 5: Musselburgh Monktonhall Terrace site is likely to support a variety of birds and wildflowers, the loss of which can have considerable negative consequences for biodiversity. An ecological/biodiversity assessment should be carried out at this site.</p>	<p>Specific surveys for particular sites for general biodiversity value are too onerous and detailed for SEA and are more appropriate for project level if required. The Site Assessment notes that the site contains several priority habitats. An application for renewal</p>	No change

¹⁰ <https://beta.gov.scot/publications/control-unconventional-oil-gas-chief-planner-letter/>

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		of planning consent reference 17/01102/P is pending consideration.	
9	<p>SEA Appendix 6: Prestonpans Any development at Cockenzie Power Station and Coal yard would require HRA. Meadowland and scrub should be conserved where possible.</p> <p>At Dolphingstone Farm the scrub and trees here should be protected from development and planting undertaken for connectivity.</p> <p>The woodland at Prestongrange Museum should be managed for biodiversity.</p> <p>The area of scrub/woodland at Wallyford should be managed for biodiversity.</p>	<p>The site assessment notes the likely need for HRA and presence of lowland meadowland at Cockenzie Power Station and Coal yard site. The presence of scrub at Dolphingstone Farm is noted in the assessment. Areas of priority habitat woodland are noted in the Prestongrange site assessment. It is not clear which site is being referred to as 'Wallyford' here. Identification of this mitigation for these proposed projects is too detailed for this strategic level assessment. Relevant comments are already covered by the ER.</p>	No change.
10	<p>SEA Appendix 6: Haddington At Liberty Hall/Land at Liberty Hall woodland should be retained and managed for biodiversity.</p>	<p>The LDP does not allocate sites at Liberty Hall for development. The presence of woodland is noted in the draft ER.</p>	No change

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11	<p>SEA Appendix 9: Dunbar Area RSPB strongly support restoration and management of the north west quarry [PM/DR/OTH008] at Dunbar for nature conservation to create a site unique in Scotland.</p>	<p>The LDP does not allocate the north west quarry at Dunbar for development. The ER notes positive effects on biodiversity from the potential development of the site for the proposed use.</p>	<p>Text of PM/DR/OTH008 Suitability for Proposed Use amended to add: "The site has good potential (and actual) bird life". Scoring of Exposure and Aspect altered to "n/a" and colouring removed as this is not relevant to the proposed use.</p>
12	<p>SEA Appendix10: North Berwick The Bickerton Field, Aberlady site is adjacent to the Firth of Forth SPA and impacts on this would need to be assessed.</p>	<p>The LDP does not allocate this site for development. The assessment highlights the potential for impact on the Firth of Forth SPA.</p>	<p>No change.</p>
<p>Magnus Thorne</p>			
1	<p>Strategic Flood Risk Assessment Mr Thorne recommends that the SFRA to be appended to the Environment Report.</p>	<p>The Council intends and is required to retain the SFRA as a standalone document.</p>	<p>No change.</p>
2	<p>Flooding issues at Andrew Meikle Grove (LDP Ref DR8, [Site assessment ref PM/DR/HSG090] Notes that there are potentially existing issues at Andrew Meikle Grove which he is concerned development at DR8 should not repeat/worsen. Appendix 9: the water impact assessment (page 59) does not appear to take into account the areas adjacent to the</p>	<p>The Council understands that the issue at Andrew Meikle Grove is one of management/adoption. The site assessment assesses 'water' as amber, which is "The site is at some risk of flooding and/or its development may increase the risk of flooding elsewhere and/or it may</p>	<p>No change.</p>

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	<p>proposed DR8 site as it does not mention the nearby areas at high risk of flooding, and should be amended.</p> <p>The soil impact assessment identifies the site as class 3.1 agricultural land.</p> <p>The Landscape impact assessment incorrectly states that there is a tree belt on the Eastern boundary of the proposed DR8 site, which screens the adjacent housing development. This tree belt is very far from being established and currently consists of some thinly planted saplings of an average height of two feet, which are struggling to survive. The landscape impact should be classified as 'significant' not 'some'.</p>	<p>have a negative impact on the water environment". The assessment of sites was done according to a consistent methodology and the Council considers this to be accurate.</p> <p>The 'tree belt' referred to in the Landscape section is mature at its southern end and does form part of the boundary to the east. The Landscape assessment as 'some' acknowledges that there is likely to be an impact on the landscape however it is not within an area designated for landscape value, and would not lead to coalescence. It would allow for consolidation of existing settlement pattern and would not impact on existing areas of open space. A score of 'some' is considered correct.</p>	
<p>Gail Hardy</p>			
<p>1</p>	<p>The plan is not sufficiently structured to take into account support services that would be needed for the expansion with key services (education, transport and health services) at capacity. Any expansion needs a more robust examination of these - including full user consultation</p>	<p>Consultation was undertaken with the Education Authority, Roads Authority and NHS Lothian for their views on services, and Transport Appraisal undertaken. The Development</p>	<p>No change.</p>

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	<p>rather than just a look at the numerical indicators provided by the Council. There will be an impact of sites in Gullane including that there will be a cumulative impact from development of all four sites on infrastructure and resources. Requests changes to LDP.</p>	<p>Contribution Framework Supplementary Guidance makes it clear where contributions to infrastructure will be required. It is not clear what changes the submission seeks to the ER.</p>	
<p>Name withheld by request (Person 1)</p>			
<p>1</p>	<p>PM/TT/HSG012 - Dryden Field, East Saltoun</p> <p>Confusingly there are two versions of the assessment on the ELC website. Despite the narrative descriptions for Dryden Field in both assessments being identical the scoring assigned to each item within the assessment differ.</p> <p>One states the site area is 4ha; it is 10.7. The proposed use states 50 units but 75 units are proposed. The scoring is inconsistent comparing this assessment with that of PM/TT/HSG093, West Crescent East Saltoun. Accessibility: sites are both within 400m of a bus stop, with no train station and limited facilities within 1600m in East Saltoun. HSG012 is rated amber while HSG093 is rated red. Ratings for exposure are also inconsistent. If the scoring was accurate HSG012 would be assessed as having a greater impact on the environment. Queries why there are two versions and who determined the scoring.</p>	<p>The Council approved the Environment Report for consultation on 17 November 2015. The related papers including the site assessment referred to were available during the consultation period in libraries and online. Unfortunately a version of the Tranent Site Assessments which was not the one approved for consultation was briefly uploaded onto the Councils consultation hub, although the correct document approved for consultation remained available online in the Committee Management Information System. There are differences between the two versions of this draft consultation document, which are minor and would not affect</p>	<p>No change.</p> <p>See also Hamilton Farming Enterprises Ltd Point 1 and HES Point 22.</p>

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		<p>the outcome of the SEA process as a whole. The site is 4 hectares, which is 10.07 acres. The number of units is given as approximately 50, with the PROP TT16: East Saltoun giving the number as 'circa 75'. The decision on which of these sites to allocate took the SEA site assessments into account however one of the reasons for allocating this site and not West Crescent was the involvement of a willing landowner which was not certain with the West Crescent site.</p>	
Name withheld by request (Person 2)			
1	<p>Cumulative Assessment of Proposed and Alternative Spatial Strategy Considers the assessment appropriate.</p>	Noted	No change requested.
2	<p>PROP HN2: Letham Mains Expansion (PM/HN/HSG044 Site B) Land in PROP HN2 Letham Mains Expansion was deemed in 2008 to be protected, protecting existing housing on the south edge of Letham Mains. What has changed? Development of the site would result in loss of Type 2 agricultural land.</p>	<p>The site of PROP HN2 Letham Mains Expansion was assessed as PM/HN/HSG044 Site B. The assessment notes that there will be loss of prime agricultural land. The assessment does not consider there will be conflict with surrounding uses</p>	No change.

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<p>Health and safety risk could arise from building housing next to a working farm with heavy vehicles, crop drying and fires being a risk to children in the area.</p> <p>Noise for new residents could arise from businesses in the Holdings.</p> <p>The number of houses at Letham Mains is disproportionate to other areas of Haddington. Haddington will not cope with the infrastructure and the market town reputation will be spoiled.</p> <p>Wildlife including grey partridge, deer and badgers will be pushed out.</p> <p>Refers to PM/HN/HSG044 Site B</p> <p>Water - notes assessment that very small areas are shown to be at risk of surface water flooding on SEPA's flood map. The commenter has encountered severe problems with water running off the fields around his property and has had to extend soakaways. House building must not impact or worsen the drainage of the site.</p>	<p>noting the adjacent small holdings. Project level assessment e.g. for noise will be carried out if required. It is not considered that health and safety risks arising from the location of the site close to a working farm would be abnormal. This site will not impact on the historic centre of Haddington and it is not considered that its market town reputation will be spoiled. There are no records of Notable Species within or adjacent to the site. The Assessment notes that a Flood Risk Assessment will be required for this site.</p>	
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Barratt David Wilson Homes per Rachel Gee			
	<p>MIR/DR/HSG132 - Preston Mains, East Linton The assessment is based on the site comprising 250 units while the current proposal is for 100 - 150 units. The assessment fails to consider potential mitigation measures that could be adopted in the future development of the site. Since the promotion of the site in response to the MIR, its assessment has been further developed in terms of landscape, traffic and archaeology and is provided within the Clarendon Planning and Development Limited Written Statement to the LDP and takes account of mitigation. That assessment concludes that the site scores very well in terms of appropriateness for housing development and that with mitigation will not result in any negative impact on the surrounding landscape or heritage environment.</p>	<p>Site assessment was based on the methodology set out at the start of the document, and this has been applied consistently across sites. The assessment considers the allocation of land for the use proposed, not an individual proposal as this could change and would be overly detailed for this stage of the process. The impacts of the details of a proposal are assessed at project level.</p>	<p>No change.</p>
Stewart Milne Homes per [name withheld by request]			
	<p>MIR/MH/HSG133 - Galt Terrace/The Loan Musselburgh Compares the assessment of this site with allocated housing sites.</p> <ul style="list-style-type: none"> • Location and accessibility , exposure – notes comments of this site in comparison to allocated sites 	<p>The assessment considers the allocation of land for the use proposed, not a particular individual proposal. The impacts of the details of a proposal are assessed at project level. Mitigation included in individual proposals could not be taken into account at this stage. It is more suited</p>	<p>No change</p>

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	<ul style="list-style-type: none"> • Aspect: the site is assessed as having a northerly aspect however the site is flat. Notes that other allocated sites including Craighall and others are also 'red'. • Suitability for proposed use: Mitigation measures would be required for potential noise from the rail (supporting information supplied by CD). • Fit with policy objectives: assessment states the site is within the Green Belt and is so assessed as 'red' while other sites also within the Green Belt including Craighall, Pinkie Mains, Levenhall, Howe Mire, Whitecraig North and South are 'green', whilst Dolphingstone is amber. This is a clear discrepancy. • Notes comments and scoring on physical infrastructure, service capacity, population, human health, soil, air, material assets. • Deliverability - states infrastructure upgrades and financial contributions can be provided; the site has national house builder involvement and is deliverable in the short term. 	<p>to the project level as mitigation might not be available for all sites this would affect the consistency of the assessment and also undermine the transparency of the process; it would be disproportionate for this stage. Aspect was judged using GIS information on DTM and aimed to be consistent across sites. On Fit with Policy Objectives/landscape, this site is considered to be very important in maintaining Green Belt objectives including prevention of coalescence and more so than other sites. There are other policy objectives which feed into Fit with Policy Objectives score besides Green Belt issues. On solar gain, this is assessed looking at the topography of the site in particular whether it is south facing. This considers the sites potential, though it is recognised that good design will also help achieve this.</p>	
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<ul style="list-style-type: none">• Biodiversity, Cultural Heritage, Water, deliverability; notes additional studies/surveys are being undertaken.• Climatic factors - states the site does offer some potential for development that is resource efficient through siting (i.e. solar gain).• Landscape - assessment notes the site is the only remaining open area between Wallyford and Musselburgh here, however, coalescence of these settlements has already occurred and this strip of land does not now contribute to wider Green Belt objectives. Craighall and others are also rated negatively for landscape coalescence issues. <p>Overall the site compares favourably with allocated LDP housing sites. The only criteria rated differently is that of 'fit with local/strategic policy objectives' due to conflict with Green Belt designation.</p>		
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BS & S Group, per [name withheld by request]		
<p>South Gateside, A6093, Haddington, Proposal HN2, PM/HNHSG044 Site B.</p> <p>BS and S Group provides their analysis of the assessment of this site in its support to show how the allocation could be extended westward to integrate the proposal area [does not give a map here]. They comment on the assessment of the PM/HNHSG044 Site B. They note that for 'Location' the allocated site is noted as being well related to the proposed Letham Mains but rated 'red'. They note there is an existing bus service on the A6093 which could be upgraded in frequency. Planned development would improve wind protection.</p>	<p>The LDP does not propose this site for development and it was not submitted at the 'call for sites' stage. Accordingly no site assessment for it was carried out. PM/HNHSG044 Site B is rated 'red' for Location as it is currently not well related to an existing settlement. This is consistent with the scoring methodology. Mitigation such as improvements to bus services is not taken into account at this stage (see Response to Stewart Milne Homes re MIR/MH/HSG133 above).</p>	<p>No change</p>
The Esperance Trust, per [name withheld by request]		
<p>MIR/TT/HSG132 [Hillview Road, Ormiston]</p> <p>The Esperance Trust consider:</p> <p>Location - should be 'positive' as well related to existing settlement.</p> <p>Accessibility - notes site is within 400m of a bus stop and 1600m of services. Should be 'positive'.</p>	<p>Location is scored correctly as well related to but outwith an existing settlement. The site does not meet accessibility standards on rail so is rated as 'amber'. Not all of the site is sheltered by existing development so is correctly rated as 'amber'. Physical infrastructure capacity is correctly rated as 'amber' as the site has some</p>	<p>No change</p>

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<p>Exposure - notes site benefits from shelter from northerly winds and so should be 'positive'</p> <p>Agrees with assessment on Suitability for Proposed Use/Fit with local/strategic policy objectives/Deliverability/Biodiversity, flora and fauna/Population</p> <p>Physical Infrastructure Capacity - should be positive as would have pedestrian and vehicle capacity and water treatment is available although waste water treatment is required.</p> <p>Service Infrastructure capacity - as proposal is for retirement housing there would be no impact on schooling, so should be 'positive'.</p> <p>Water - assessment notes site is not at risk of flooding though to the east and south there are areas at risk. Should be 'positive'</p> <p>Air - development on site would not be affected by existing sources of air pollution and would have moderate public transport accessibility. Should be 'neutral'.</p> <p>Climatic factors - risk of car based journeys increasing emissions is similar to all housing allocations in smaller settlements.</p>	<p>transport and waste water constraints. Education is correctly taken into account as the assessment considers the allocation not the proposal. For flooding the assessment takes into account that there are areas at risk of flooding nearby, and correctly rates it as 'amber'. For Air, the assessment notes that realistically car use will increase which could exacerbate air quality issues in Tranent High Street, and is therefore correctly marked as '-' and 'amber'. This site, consistently with others taking prime agricultural land, is marked as 'red', '-' for Material Assets. For cultural heritage, as the Esperance Trust note, it is not in a Conservation Area or affecting a Scheduled Monument or Listed Building. It is correctly 'green' and 'o'. For landscape, development of the site would impact on the setting of the historic heart of Ormiston. SNH comment that its development could present locally adverse landscape</p>	
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	<p>Material assets - site assessed negatively but this is the case in the majority of LDP allocated sites. Considered neutral.</p> <p>Cultural heritage - Not in a Conservation Area, adjacent to a Scheduled Monument or containing Listed Buildings, HES do not comment. Considered 'neutral'.</p> <p>Landscape - . Landscape should be assessed as amber as suitable landscape design (submitted) would improve long range views.</p> <p>Notes content of assessment on other factors.</p> <p>The site would offer landscape enhancement and provide retirement housing in a suitable location accessible to public transport and services.</p>	<p>impacts. The impact is considered to be correctly scored.</p>	
<p>Traquair and Stewart Families per [name withheld by request]</p>			
	<p>Comments relate to a representation submitted to the LDP (ANON-ZMS3-3M73-Q); [Ewan Rutherford per Justin Lamb re extension to MH2: 2 parcels of land shown on supporting document, Area A being 2.5 ha, a former walled garden on the SW edge of Old Craighall, Area B being 5 acres to the immediate south of Area A bounded by proposed housing site MH2 to the east and the landscape edge to the A720 City Bypass to the south].</p>	<p>The assessment given considers a site boundary which differs from that assessed in the ER. The ER assessment was based on sites submitted in the Call for Sites. The site referred to has not been included in the LDP and there is no requirement for it to be assessed with the boundaries now</p>	<p>No change</p>

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	<p>The proposed site is partly included in PM/MH/HSG056 (Part A), part in SDP/MH/HSG003 (Part B) and partly in MIR/TT/HSG132.</p> <p>Refers to supporting document sent by email. Provides a comments under the Site Assessment headings with regard to the proposed site.</p>	<p>given. The ER must include an assessment of the proposed strategy and its reasonable alternatives. The sites included in the LDP are included within ER site assessments and where these sites have been reduced in size effects have not been missed. The Council is not required to examine through SEA alternatives that were not considered. It is therefore not proposed to add a Site Assessment for this site specifically.</p> <p>Assessment of the effects has been carried out between the site assessments for the sites submitted as detailed above. While effects of the site now proposed may as a result not be as set out in those site assessments, effects that do remain will not have been missed. The assessment is therefore adequate in identifying the effects.</p> <p>This site, and assessment could be submitted for consideration under</p>	
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		LDP review, but this is not a matter for this ER.	
Apt Planning & Development Ltd per Tony Thomas			
1	<p>MIR/ NK/OTH024 Whitekirk Burial Provision</p> <p>This assessment should be deleted. The proposal is based on incorrect land ownership information and the assumption that this land would be gifted to East Lothian Council. The land is in private ownership and is not available at no cost. It is not suitable for a cemetery as it has no safe access, and would be totally out of character with the remainder of the field of which it is part.</p>	<p>The proposal was originally included in the LDP as the site was considered potentially suitable for providing burial ground in Whitekirk. The Environment Report requires to assess the significant environmental effects of the plan. Therefore it is appropriate that a site assessment of this proposal is included within the Environment Report. Access is considered to be possible onto the West Road. It is considered that development of the site for the use proposed would have to be sensitively designed to retain the character of area, and landscape is thus marked as 'amber' and '?' which is considered correct.</p>	No change
Sirius Sport and Leisure per Stuart Salter, Geddes Consulting Ltd			
1	<p>PM/MH/HSG067 South West Wallyford (Gula Flats)</p> <p>The allocated site MH13 Howe Mire is a significantly different and smaller site to that assessed as</p>	<p>The assessment of PM/MH/HSG067 covers the larger site (MH12 and MH13). This means the significant</p>	No change

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<p>PM/MH/HSG067. The Council has assessed the site but excluded mitigation measures introduced by the proposal, and this is reviewed following the Council’s methodology. The findings are the proposal scores more positively than the Council’s assessment for Biodiversity, flora and fauna, Human Health, Water, Air, Climatic factors, Cultural Heritage, Landscape, and remains the same as regards Population, Soil and Material assets. This takes into account the proposals inclusion of greenspace and gardens, exclusion of areas of flooding and proposals for surface water drainage, details of design to benefit from solar gain, and results of studies into impacts on the Battlefield. Concludes there are now net environmental benefits, and that the site performs as well as others in the Proposed Plan in Musselburgh Cluster. Landscape – assessment of views from the west need to take into account the large scale of development already allocated.</p>	<p>effects of its development – in strategic terms – have been captured. Mitigation included in individual proposals including their specific design cannot be taken into account at this stage. It is more suited to the project level as mitigation might not be known for all sites so this would affect the consistency of the assessment and undermine the transparency of the process. Consideration of site specific mitigation is more appropriate at the project level.</p> <p>HES note that development at MH13 Howe Mire has the potential for very negative impacts on Pinkie Battlefield. HES state as regards MH12 Barbachlaw that the ER commentary on PM/MH/HSG067 Cultural Heritage, that “its development would raise issues of national importance” may not be the case for MH12: Barbachlaw. MH13 is therefore the most sensitive part of</p>	<p>(see also HES Point 12 and 13 above)</p>
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		<p>PM/MH/HSG067 in terms of the Battlefield.</p> <p>The assessment for Landscape considers the impact against the current baseline in line with the methodology.</p>	
Wallace Land Investments per Stuart Salter, Geddes Consulting Ltd			
1	<p>Drylawhill, East Linton SEA ref MIR/DR/HSG124</p> <p>Site assessments were undertaken by the Council. Wallace Land Investments has reviewed the site assessment for Drylawhill, and updated it to take account of the proposals approach to sustainability and mitigation measures. The proposal scores more positively for water, air, climatic factors, cultural heritage and landscape, and is the same for the remaining SEA topics. This takes into account that potential flooding issues in the east of the site can be completely addressed through SUDS measures; details of the proposal avoiding impacts on cultural heritage assets; landscape and visual assessment will be carried out to determine mitigation. For impacts on air, impacts would be similar to other sites with similar accessibility, and the potential rail station would improve modal share. For climatic factors notes Council assessment that an increase in car based travel would be inevitable. The range of facilities in East Linton would however reduce the need to</p>	<p>Mitigation included in individual proposals including their specific design cannot be taken into account in site assessments at this stage. As mitigation might not be available for all sites taking it into account would affect the consistency of the assessment and also undermine the transparency of the process; it would be disproportionate for this stage and is more suited to project level assessment. The site assessments aim to be consistent in their approach, so impacts on air should be assessed similarly to sites with similar accessibility those this is particularly in regard to distances travelled and impact on areas where there are</p>	<p>No change.</p>

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	<p>travel, and there is potential for the railway to take modal share. The site is south facing so there is some potential for houses to benefit from solar gain.</p>	<p>existing air quality concerns. It is considered that despite the range of facilities in East Linton the assessment correctly considers that some increase of car based travel would be inevitable.</p>	
2	<p>Fishergate, Prestonpans PM/PP/HSG130 Site assessments were undertaken by the Council. Wallace Land Investments has reviewed the site assessment for Drylawhill, updating it to take account of the proposals approach to sustainability and mitigation measures. The proposal scores more positively against the Council's assessment for Biodiversity, flora and fauna, water, climatic factors, cultural heritage, landscape and remain the same for the other SEA topics. This takes into account the proposals inclusion of greenspace and planting, SUDS, provision of a sustainable travel pack, proposed design of the site and mitigation of impacts on cultural heritage assets, which allows the score to be upgraded. Landscape – SNH raise coalescence issue; the proposed site and Blindwells is separated by over 600m of countryside, the A198, a railway and areas of structure planting. There is no coalescence.</p>	<p>Mitigation included in individual proposals including their specific design cannot be taken into account in site assessments at this strategic stage. As mitigation might not be available for all sites taking it into account would affect the consistency of the assessment and also undermine the transparency of the process; it would be disproportionate for this stage and is more suited to project level assessment. SNH is the key agency with responsibility for landscape, and they have raised issues of coalescence with the emerging new settlement at Blindwells.</p>	<p>No change.</p>

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Hamilton Farming Enterprises Ltd			
1	<p>Dryden Field PM/TT/HSG012</p> <p>The Council carried out a site assessment, excluding the mitigation included in the proposal. A review has been carried out by Hamilton Farming Enterprises Ltd which concludes the sites scores more positively for water, air, climatic factors, cultural heritage, landscape and remain the same for the other SEA topics. There are now net environmental benefits, taking into account the proposals landscape, provision of SUDS, design in accordance with the Conservation Area and avoiding harm to listed buildings. Landscape impact can also be minimised through design. These factors allow the score to be upgraded. Climatic factors – primary school, shop and bus stop are within an easy walk of the site and homes facing south east to south west can benefit from solar gain so the score can be upgraded.</p>	<p>Mitigation included in individual proposals including their specific design cannot be taken into account in site assessments at this strategic stage. As mitigation might not be available for all sites taking it into account would affect the consistency of the assessment and also undermine the transparency of the process; it would be disproportionate for this stage and is more suited to project level assessment. Despite the fact East Saltoun has a small range of facilities in assessment correctly considers that some increase of car based travel would be inevitable.</p>	<p>No change.</p> <p>See also Person 1 Point 1 and HES Point 22.</p>
Lothian Park Ltd			
1	<p>PM/MH/BUS002</p> <p>The Council carried out a site assessment, excluding the mitigation which would be included in the proposal. A review has been carried out which concludes the site scores more positively for biodiversity flora and fauna, water, climatic factors and cultural heritage and remain the same</p>	<p>Mitigation included in individual proposals including their specific design cannot be taken into account in site assessments at this stage. As mitigation might not be available for all sites taking it into account would</p>	<p>No change</p>

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	<p>for the other SEA topics. There are now net environmental benefits. The re-assessment takes into account the details of a specific proposal in greenspaces is included, that the area potentially at risk of flooding is proposed as open space and the design of buildings to benefit from solar gain. Cultural heritage – the site does not contribute to the battlefield landscape so the score can be upgraded.</p>	<p>affect the consistency of the assessment and also undermine the transparency of the process; it would be disproportionate for this stage and is more suited to project level assessment. The assessment notes the site does not contribute strongly to the battlefield landscape.</p>	
<p>Wallace Land Investments Ltd</p>			
<p>1</p>	<p>Refers to PM/MH/HSG005 – PROP MH15 Whitecraig North. The Council carried out a site assessment, excluding the mitigation which would be included in the proposal. A review has been carried out which concludes the site scores more positively for biodiversity flora and fauna, human health, water, climatic factors, material assets, cultural heritage and landscape, and remain the same for the other SEA topics. There are now net environmental benefits. This takes into account mitigation provided by the proposal in that biodiversity enhancement and gardens, exclusion of the northern part of the site where contamination, radon gas and noise could impact human health, as well as avoiding much of the flood risk; design of housing to benefit from solar gain; and reduction in size of the proposal and provision of a robust new green belt boundary. On cultural</p>	<p>The site assessments show the worst case. PROP MH15 is smaller than site assessed through SEA as PM/MH/HSG005. As the size of the site has been reduced, the impact is likely to be less and no worse than that identified for the larger site. This means the significant impacts of its development have been captured. Mitigation included in individual proposals including their specific design cannot be taken into account in site assessments at this stage. As mitigation might not be available for all sites taking it into account would affect the consistency of the</p>	<p>No change.</p>

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	<p>heritage, the HES scheduling has now been confirmed and is not within the proposal site. It is on the edge of Pinkie Battlefield however research shows development will not undermine the understanding of the battle. The proposal mitigates impacts on listed buildings, allowing the score to be upgraded.</p>	<p>assessment and also undermine the transparency of the process; it would be disproportionate for this stage and is more suited to project level assessment. The assessment notes the site does not contribute strongly to the battlefield landscape. Cultural heritage – HES comments that there may be cumulative impact on the Pinkie Battlefield if all sites development of this site on its own does not have significant impacts which cannot be mitigated, it could, with others, have incremental impact on its landscape and special qualities.</p>	
2	<p>PM/NK/HSG137 – Fenton Barns The Council carried out a site assessment, excluding the mitigation and approach to sustainability, which would be included in the proposal. A review has been carried out which concludes the site scores more positively for population, human health, water, air, cultural heritage and landscape, and remain the same for the other SEA topics. There are now net environmental benefits. This takes into account mitigation including for human health that any contamination would be remedied and open space and sports provision would be incorporated; for water that</p>	<p>The sites were assessed against a consistent methodology, which did not take into account specific proposals or suggestions of mitigation as this is for project specific assessment to do. It is not appropriate to take mitigation into account at this stage as the assessment is looking at the general sensitivities of the site itself and allocation for the particular type of</p>	<p>No change</p>

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<p>SUDS and new foul drainage will be introduced; for cultural heritage that design will ensure no designated sites are affected; for landscape the greenspace strategy will provide further containment. For air, the current industrial use at Fenton Barns is compatible with residential amenity. The rail station is nearby so modal share of rail should be higher than other proposed allocations. Landscape – the site is not sensitive and the proposal works with topography, with greenspace strategy providing further containment. There will be views from the Garleton Hills but alterations need to be seen in the context of changing urban form of existing towns and villages.</p>	<p>development proposed. It does not consider mitigation put forward by a proposal as the assessment is of the allocation not of the proposal. It is recognised improvements to drainage at Fenton Barns are desirable however it is not a prerequisite of development that an existing issue be addressed, so this is not included in assessment: such improvements could be delivered by means other than an LDP allocation. As regards air it is considered that development here would result in increased vehicle emissions despite the proximity of the train station, and this was reflected in scoring. Current industrial use may be compatible with residential amenity however, permitted changes of use may not be so and this was considered during assessment.</p>	
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