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Document Title	East Lothian Local Development Plan 2018: Supplementary Planning Guidance – Design Standards for New Housing Areas – Summaries of Responses to Consultation

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Additional information:

This report accompanies the report to Council on 26 Feb 2019 - East Lothian Local Development Plan 2018 – Supplementary Guidance: Town Centre Strategies, Report on Consultation; and Supplementary Planning Guidance: Green Networks; Design Standards

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Appendix 5 - DESIGN STANDARDS FOR NEW HOUSING AREAS – summaries of response to consultation

Question 1: Thinking about new housing developments that have been built within the last 10 years in East Lothian (or any that are still under construction), how would you rate the overall design quality of these developments?

Respondent	Response	Officer comment	Recommendation
Barratt Homes	Good - Our feeling is that development in East Lothian has been of a good standard.	Comments noted	
Dementia Friendly East Lothian	Fair, poor - poor quality public space and very little of it <ul style="list-style-type: none"> • lack of benches and walkability for older citizens, pregnant people etc. - people need a rest • no consideration of the need for indoor or covered public space and that this should be for everyone affordable housing? • not always accessible to public transport • designed for young fit people not older or disabled people to walk and get about 	Comments noted. The SPG states in the Open Space, Green Networks and Biodiversity section that path networks must be accessible to all user groups. Appendix 1 para 2.25 makes specific reference to street furniture and access for wheelchair users. However, more guidance on this matter is required and the revised SPG will expand on existing points and provide further guidance to ensure that new development proposals put the needs of children, elderly and disabled to the fore. General development accessibility and public transport routes are covered in LDP 2018 policies, however the SPG will also provide more clarity on this.	Carry out additional work on the draft SPG and bring it to a future meeting of ELC where approval
East Lothian Play Association	Fair - There is a general sense of lack of character and not enough attention to children and young people as residents and users of their neighbourhood space.	Comments noted. It is accepted that the revised SPG should include more guidance on the design standards that would be expected in order to create attractive spaces for children and young people. Whilst the SPG (p17) refers to small spaces/recreation/play and Policy OS4 and OS5, it would be advantageous to expand	will be sought to re-consult on the revised version

		this section to provide more guidance that caters for the needs of younger people.	
Anonymous 1	Poor - West Road Haddington, rows of boxes	Comments noted. The updated SPG is intended to be used to improve the quality of new housing developments going forward by supplementing adopted LDP 2018 policies, requiring more adaptability from volume house builders towards site design and masterplanning techniques that maximise a sites' locational and contextual potential, and referring to best practice.	
Anonymous 2	Poor, very poor - I think cheap and cheerless sums it up. All the developments I have seen in Gullane, North Berwick, Wallyford, Aberlady and Prestonpans are the same badly built houses without character.	Comments noted. Whilst uniformity can in itself be an attractive design feature, it is highly dependent upon location and context. The revised SPG will include more references to adopted LDP 2018 policies (including DP1 and DP2) and more detailed guidance on landscape character and setting, to highlight the need to design developments that are appropriate to local context, and housing styles that have been adapted to specifically respect their setting.	
Anonymous 3	Fair. ELC's policies, specially its insistence on street scene, has had good effect. Layout, in particular, has become more responsive to individual sites. Good examples of older developments that include sensitively laid out, and listed, public housing schemes can be found in Belhaven and East Saltoun. There has been too great an insistence over the years on traditional design and materials, causing some stereotyped design, even where the layout is innovative and, indeed, successful e.g. the Cala scheme at Nungate Gardens in	The ELLDP and its Policy DP2 allows sufficient flexibility in terms of design and materials. Policy DP2 states that the design of new development must be appropriate to its location in terms of size, positioning, form, massing, and scale, and to use a limited palate of materials and colours that complement its surroundings.	

	<p>Haddington. The SPG should encourage schemes using a boldly contemporary aesthetic in suitable locations and soften the rigidity of some of the policies in the body of ELLP which lay down, in an unnecessarily restrictive way, which building materials are deemed acceptable. An example of an extremely fine and uncompromisingly contemporary house in a CA can be seen at Winterfield Place, Belhaven.</p>	<p>The ELLDP and its Policies DP1 and DP2 do not seek to encourage schemes using a boldly contemporary aesthetic. Instead, these policies require new developments to be well integrated into and complement its surroundings. It is reasonable to assume that new developments using either contemporary or traditional/historic aesthetics can achieve this overarching policy objective.</p> <p>The SPG may be more explicit in clarifying that both contemporary and traditional/historic aesthetics will be acceptable subject to the design that enables development which is well integrated into and complement its surroundings. References to examples of good practice are welcomed and will be explored for the revised SPG.</p>	
Anonymous 4	<p>Good. I have a three bed new build in Dunbar. It's a well laid out little house, low maintenance and cheap to run. The streets on the estate are not cluttered and well supplied with children's play areas and easy access to the surrounding countryside.</p>	<p>Comments noted</p>	
Anonymous 5	<p>Fair. As usual no thought in design for local (walkable) facilities shops pubs community halls</p>	<p>Walkability is/will be fully covered by the SPG. The provision of community facilities is in general a matter that relates to the LDP 2018 policies, site allocations and developer contribution requirements. However, the SPG has an important role to play in ensuring that community facilities (where provided) are well-integrated into site layouts and are easily accessible by walking, cycling and public</p>	

		transport. This will be set out in more detail in the revised SPG.	
Anonymous 6	<ul style="list-style-type: none"> ▪ Very poor ▪ Poor quality materials ▪ No environmental interest ▪ Too much land taken for housing that could be for nature ▪ Not thought through for Community living ▪ No post boxes ▪ Too much revolving around cars ▪ Built cheaply for profit ▪ Uninspiring design - look to Finland and Denmark for good design 	<p>Comments noted. Achieving house types that meet the needs of residents (affordability, garden space etc.) whilst also ensuring that a site performs well in terms of environmental improvement, landscaping, layout, open space etc. requires a balance to be made. Ensuring that a site is designed well from the outset e.g. using design principles and techniques applied to masterplanning stages is of primary importance, in particular designing for people and active travel over private motor vehicles.</p> <p>It is recognised that there is scope for developers to provide a greater variety and style of housing. The revised SPG will include more examples of best practice to encourage broader thinking on what can be achieved.</p>	

Question 2: Do you think that new housing developments built in East Lothian over the last 10 years are of a standard that reflect the existing built quality of the area?

Respondent	Response	Officer comment	Recommendation
Barratt Homes	Yes - Housing design has developed over the years, however comparing new developments over the past 10 years to 60-70s housing developments, we would say there has been an improvement in built quality.	Comments noted	Carry out additional work on the draft SPG and bring it to a
Dementia Friendly East Lothian	No - You just have to look or go inside! Smaller rooms, more jammed tighter, poor quality spaces.	Comments noted. The matter of minimum house/room sizes are set through Building Regulations/Space Standards and will not specifically be addressed in the revised SPG. However, ELLDP 2018 policies DP1, DP2 and	

		DP3 seek to ensure good design and high quality spaces that are usable and suitable for all user groups. More detail on house types will be added to the existing section in the SPG for the revised version.	future meeting of ELC where approval will be sought to re-consult on the revised version
East Lothian Play Association	Unsure	Comment noted	
Anonymous 1	No - doubt they'll still be here in 100 years. Don't fit in, just new boxes plonked around the edges of our towns and villages	Policy DP1 and DP2 seek to ensure that new developments are appropriate, respect and complement their context and identity of the surrounding area.	
Anonymous 2	No - the quality of the older houses, especially those build in the 19th century, is far superior to any of the new developments, both in building quality and aesthetics.	Comment noted. It is difficult to draw a direct comparison between the quality of the older and new build houses. However, it should be noted that the older houses were designed to accommodate significantly larger families (compared to an average household size of 2.4 in 2017) and this in itself would have a significant impact on the design of the buildings. Also, energy efficiency has improved significantly for new build with the aim to also be low maintenance buildings. These factors are taken into account when designing and building new houses, and often result in a simpler building envelope and plainer external design.	
Anonymous 3	No. The historic built environment of East Lothian is characterised by a self-confidently local vernacular, influenced by the fashionable architectural styles of the capital. The modern idiom, as practised by almost all contemporary housing providers, is characterised by	It is accepted that volume house builders often use standardised housing designs. However, this approach can be enhanced by the LDP and its policies as well as relevant SPGs which cumulatively can achieve positive outcomes in	

	commercially well-proven, commercially successful off-the-peg designs taken from the UK as a whole. The result is a homogeneity which can be oppressive. This gives the SPG less scope to influence house design than it has over estate layout. ELC has found some ways of mitigating this problem by emphasising the need for a good housing mix. This might be made more effective if the SPG were more thoroughly cross-referenced, not only to the emphasis on architectural excellence in Scottish Government guidance, but in the work of other professional and advisory bodies.	<p>terms of e.g. design, development layout, landscape or tenure. It should be noted that the Development Briefs SPG also includes specific requirements that would influence house design. The proposed SPG has scope to influence this further.</p> <p>The final SPG can include more references to other professional and advisory bodies and any examples of good practice provided these are appropriate and relevant to East Lothian.</p>	
Anonymous 4	Unsure. The new houses don't look like the existing houses or use the same materials. That said they are frequently better houses to live in. I'm not sure how you "reflect the existing build standard" when you're trying to improve.	Comment noted. It is recognised that (in general) the efficiency and sustainability of new housing has improved significantly.	
Anonymous 5	Yes - I think standard is generally good however houses are very close together in some developments	Comments noted	
Anonymous 6	<ul style="list-style-type: none"> ▪ Poor building materials ▪ Built for profit ▪ Loss of natural land ▪ Dunbar has too much newbuild now and it is not fair on the Community 	<p>Building materials used by volume house builders should meet the requirements of the LDP (e.g. Policy DP2 or DP4) and comply with Building Standards. The latter require that materials, fittings and components used in the construction of buildings should be suitable for their purpose, correctly used or applied, and sufficiently durable, taking account of normal maintenance practices.</p> <p>Land allocated for housing has been assessed during the LDP 2018 preparation process which culminated with the independent LDP examination that looked into a number of issues, including the loss of natural land. The</p>	

		housing requirements in the LDP reflect the housing apportionment included within the SESPlan.	
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Question 3: Based on your experience of living in or visiting any new housing developments built within the last 10 years in East Lothian, what (if anything) would you change about their design or layout?

Respondent	Response	Officer comment	Recommendation
Barratt Homes	We consider the need for 'primary streets' within new developments an unnecessary requirement that hinders the designing for streets principles. Highways have always insisted on footpaths to one side of the road and this includes shared surfaces, which again goes against the designing for streets principles.	Designing Streets advises that road hierarchies based on terminology such as local distributor/local access roads should no longer be used and the SPG will follow this advice. The requirement for footpaths as part of shared surfaces and the requirement to keep them separate from streets is considered appropriate when traffic speeds exceed 20mph. In areas where speeds can be kept below this limit through design, a separate footpath may not be needed. However, it may be considered appropriate for shared surfaces to include the use of e.g. tactile paving to indicate the change in condition to visually impaired pedestrians. The revised SPG will provide further clarification and examples of best practice.	Carry out additional work on the draft SPG and bring it to a future meeting of ELC where approval will be sought to re-consult on the revised version
Dementia Friendly East Lothian	<ul style="list-style-type: none"> • Life time accessibility • Design for range of impairments • Where is the affordable housing? • You need to be very young and fit to walk in and out without even a bench to sit on 	Comments noted. The SPG will consider the issues such as life-time accessibility and designing for range of impairments. Affordable housing requirement set at 25% but this is not a matter of the SPG unless it is related to specific design considerations e.g. integration and tenure blindness.	

		The SPG includes a number of references to street furniture, such as tables, benches and chairs. However, it may be appropriate for the revised SPG to consider street furniture in the context of life-time accessibility and designing for range of impairments.	
East Lothian Play Association	The design should not overlook the needs of children, young people and families and that there be suitable spaces for play and informal gathering. Play has been called children's 'first claim on the community', is a right recognised in the Convention on the Rights of the Child, and is a form of everyday participation. In communities where children are able to play outdoors by their doorsteps and in increasing ranging distances further from home, evidence shows that there is a stronger sense of community, and intergenerational and neighbourly contact.	Comments noted. There is a need for more references to children and play requirements which are set out in the LDP 2018 policies. The revised SPG will include more guidance on this including reference to the East Lothian Council Plan Policy 2017.	
Anonymous 1	Front gardens too large, acres of useless grass. All look the same. No solar panels when they would be cheap to add at the building stage.	Comments noted. The SPG refers to front garden length of no more than 3.5m (Appendix 1 - Defensible Space para 2.23). This is seen as a design technique that offers advantages such as providing occupiers with some defensible space but ensuring that there is activity at street level by keeping set-back of building lines to a minimum. The LDP 2018 design policies refer to sustainable design, however it is accepted that greater emphasis and more detailed guidance on this is required in the revised SPG.	
Anonymous 2	Build fewer but better houses. Use traditional materials and designs (they have stood the test of time). Most houses should be detached and have a large garden around them.	Comments noted. The number of houses on individual sites is based upon achieving a minimum average density of 30dph as set out in LDP 2018 policy DP3. The SPG reflects this approach and will provide further clarity in the	

		<p>revised draft. LDP 2018 design policies already require use of appropriate materials, but the SPG should have a detailed section on this with good visual examples. It is not accepted that detached houses should be the dominant house type for new developments as this does not meet density requirements set out in policy. There must be of an appropriate range and mix of housing to serve different market sectors and to create some variety in built form. House types must also make provision for amenity space as it is important and necessary.</p>	
<p>Anonymous 3</p>	<p>The SPG needs to emphasise that ELC is committed to applying its policies with vigour, and that developers should expect this if they wish to conduct business here.</p> <p>It might be beneficial if senior council management could devote some effort to the systematic education of councillors, perhaps by taking them on site visits illustrating where policies went well and, equally important, where they have gone catastrophically wrong. I would recommend the Whitekirk golf development as a vivid demonstration of a wrong-headed planning decision by councillors, where supposed tourist benefits were judged to be more important than safeguarding the county's built and natural environment. "Tourism" was the excuse. It was seen as opposed to conservation instead of complimentary to it. Councillors need to confront the danger of short-termism, and killing the goose which lays the golden egg. To egg up the pudding just a little, the SPG needs to deal with the problem of special pleading. These insidious proposals which regularly are submitted can only be resisted if councillors are better informed about the merits of conservation; if misleading antitheses such as the glib and frequently invoked conservation/tourism dichotomy are</p>	<p>Comment noted. The revised SPG will include more emphasis of LDP 2018 policies and how the design principles link with these.</p> <p>Comment noted regarding conservation. The revised SPG will include more references to heritage in general.</p> <p>Decision making, Councillor training/ awareness of planning policies, and decisions on appeal sites are not matters to be addressed in this SPG.</p>	

	recognised as false; and if Council staff can be better trained and more effectively supported in being proactive. To sum up, I would suggest that conservation be much more boldly highlighted throughout the SPG.		
Anonymous 4	Get infrastructure like bus stops and post boxes in from the start. Also think more about the layout of pavements. People like to walk, having the path suddenly stop and find yourself at a road junction with nowhere safe to stand is not good.	The LDP allocates sites that can be served by public transport and the design policies require this to be demonstrated through a masterplanning process. The LDP includes a number of sites for mixed use residential development with community, education and retail facilities which are (or will be) supported by the required infrastructure provision and are accessible by public transport or walking and cycling. The SPG will provide supportive guidance, including examples of best practice to enable the delivery of well-designed, well-connected and coherent places. The Royal Mail maintains overall responsibility for providing and maintaining post boxes, however the SPG could provide some recommendations on how these could be integrated into new housing layouts.	
Anonymous 5	See answers to 1 and 2	Comment noted	
Anonymous 6	Stop building as many Do not agree to new development near Hallhill and the Kennels. Think about Community not run it as a profit making thing this is sad and impacts on quality of life negatively	Comments noted. Housing requirements are set out in Strategic Development Plans (SESplan) and the LDP in order to meet demand and population growth. This issue is not relevant for the SPG.	

Question 4: What do you think the Council could do to ensure that housing developments in East Lothian are better designed?

Respondent	Response	Officer comment	Recommendation
Barratt Homes	Consider fully the designing for streets principles. Each new development should be considered on its own merit and design and not needing to meet a series of requirements.	Any advice included in Designing Streets will be carefully considered in the SPG. It is accepted that each site must be assessed on its own merits. The SPG is not attempting to be a checklist that all sites must meet – it is aspirational, seeking to raise the standard across East Lothian. Some design techniques/outcomes will not be achievable on all sites.	
Dementia Friendly East Lothian	<ul style="list-style-type: none"> • Think about people of all ages and disabilities • Think about housing for different life stages • Realised that it's about home, neighbours and neighbourhood not just buildings • Build in opportunities for social connections and community - this supports social health • Build more affordable and varied housing and link to what people need not just wh... (incomplete response) 	<p>The revised SPG will include more guidance on designing for all ages and disabilities. General development accessibility and public transport routes are covered in LDP 2018 policies, however the SPG will also provide more clarity on this.</p> <p>Also, the SPG will include more guidance on adaptable (flexible) homes to cater for varied requirements of their occupiers, including elderly and disabled persons.</p> <p>Social interaction – the SPG includes references to this e.g. open space, street furniture, community gardens etc.</p> <p>Comment on affordable housing are noted. However, the requirement is set by the LDP at 25% and therefore this is not a matter of the SPG. Issues related to specific design considerations e.g. integration and tenure blindness will be covered by the SPG.</p>	<p>Carry out additional work on the draft SPG and bring it to a future meeting of ELC where approval will be sought to re-consult on the revised version</p>
East Lothian Play Association	We have excellent example in East Lothian from the Tranent 'Streets Ahead' project which shows the	Comment noted and reference to good practice is welcomed.	

	contribution that children can make to a vision for better spaces to live in. The children take into account not just their own needs but the needs of communities living together. One-off exercises do not bring the depth that projects such as this do. More of this please!		
SNH	SNH suggest that the benefits of green infrastructure as a key element of successful and sustainable places are more strongly and clearly emphasised in the SPG. This approach is fully supported by SPP para 219. Also in par 221 SPP confirms that the planning system should “consider green infrastructure as an integral element of places from the start of the planning process.” SNH also emphasise the relevance of the principles of good design as outlined in the Scottish Government document <i>Green Infrastructure: Design and Placemaking</i> . If required SNH could provide further detailed advice on these issues.	Comments noted. It is accepted that more references to green infrastructure, including <i>Green Infrastructure: Design and Placemaking</i> are required in the SPG.	
Anonymous 1	Don't know	Comment noted	
Anonymous 2	Don't let companies like Barratt build in the county. It's clear that they won't build any nice houses, because they are in the business of building cheap houses, just good enough to survive the warranty period without too many defects, and make as much money as possible for their shareholders.	Comment noted. The issues of land ownership, specific house builders developing sites, and matters relating to Building Standards are not relevant to the SPG.	
Anonymous 3	<ol style="list-style-type: none"> 1. Employ a Conservation Officer 2. In-service training in design and conservation for case officers. 3. Improve staff numbers, quality and retention - and morale. 	<p>Points 1, 2, 3 & 4 – comments noted but not issues to be addressed in the SPG</p> <p>Point 5 – comment noted and agree there needs to be more reference to LDP 2018 design policies</p>	

	<p>4. Education of elected members in what their own policies are, supported by case study excursions.</p> <p>5. Greater emphasis in the SPG on the Council's determination that ELLP policies will be applied, not circumvented.</p> <p>6. Where a site contains a Listed building, a Scheduled Monument, or any other distinguished feature, the SPG should state that developments will be required to leave space for the setting of these features. [See discussion below]</p>	<p>Point 6 – comment noted. The SPG could benefit from more references to heritage. In general, these issues are often addressed in other LDP policies, development briefs and/or consultation with HES.</p> <p>Comments on landscaping and open space noted. Revised SPG to address this in more detail</p>	
Anonymous 4	<p>Landscaping could be better with more green space. Designated areas for bins rather than cluttering alleyways would be an improvement.</p> <p>A lot of people have dogs - design in dog walking areas with poo bins. We don't want to spend our lives wandering around bits of waste land. More litter bins and empty them regularly. Fast-food litter is a problem, probably because lazy people like it, As the vendors like putting their logos on everything can't you bill them for clearing the mess up?</p>	<p>Comments noted. The SPG includes a specific section on open space and is encouraging walking and cycling, however it is recognised that more references and examples of good practice are required. These will be included in a revised draft SPG. Waste is a matter to be looked at in greater detail and ELC Waste Services are contributing to the production of the revised SPG. The origin of waste is not a matter that is to be addressed in this SPG.</p>	
Anonymous 5	<p>Make sure focus is about legacy and infrastructure. Car free is great provided a coordinated bus service from station goes to developments</p>	<p>Comments noted. The SPG highlights the benefits of car-free areas to be introduced (where appropriate) but does not set a requirement for the whole site to be designed in this manner. The LDP 2018 policies set out general development location requirements (policies T1 and T2). The revised SPG will include more references to how to design for public transport including bus routes.</p>	
Anonymous 6	<p>Stop building as many Redesign small areas on high street Solar panels Have shops and pubs and postboxes</p>	<p>Comments noted. Housing requirements as set out in the Strategic Development Plan and reflected in LDP 2018 allocations are not an issue to be addressed in design SPG.</p>	

		<p>The LDP 2018 design policies refer to sustainable design including use of renewable technology, however it is accepted that greater emphasis and more detailed guidance on this is required in the revised SPG.</p> <p>The provision of community facilities is in general a matter that relates to the LDP 2018 policies, site allocations and developer contribution requirements. However, the SPG has an important role to play in ensuring that community facilities (where provided) are well-integrated into site layouts and are easily accessible by walking, cycling and public transport. This will be set out in more detail in the revised SPG. The Royal Mail maintains overall responsibility for providing and maintaining post boxes, however the SPG could provide some recommendations on how these could be integrated into new housing layouts. This will be looked at in more detail in the revised draft SPG.</p>	
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Question 5: Do you have any comments to make on the Introduction to the Design Standards for New Housing Areas SPG (P.1 - 3)?

Respondent	Response	Officer comment	Recommendation
Barratt Homes	The only area that concerns us is the statement that says 'housing environments can be created by a designer's creative skill and vision in the interpretation, expression and application of these standards'. Whilst this can be seen as a positive for the designer, the concern lies that the design is also open to the	Comment noted. As this is within the introductory section, the use of overly prescriptive text here could lead to inflexibility and lack of variety for the end product i.e. housing developments. The Design SPG aims to supplement LDP 2018 policy whilst at the same	Carry out additional work on the draft

	<p>interpretation of the planning officer responsible for each development. This should be more prescriptive. We think it comes down to the site location and that each new development needs to be considered on its own merits.</p>	<p>time allowing for variety in design solutions to be brought forward. More variety and creativity are required and will continue to be encouraged by the SPG.</p> <p>Any design solution is based (partly) on the interpretation of policy and guidance. It is for the planning authority to decide whether the design has adequately addressed policy and guidance, and whether the design is suitable for the site based on an 'each site on its own merits' approach. The design SPG aims to assist designers in arriving at the best solution for any site and is more prescriptive in within appendix 1 where technical standards are required.</p>	<p>SPG and bring it to a future meeting of ELC where approval will be sought to re-consult on the revised version</p>
<p>Dementia Friendly East Lothian</p>	<p>Agree with the principles, but where's the practice? And you need to think about more than buildings but communities and that you are building homes. There is a lot of evidence on how important this is. Home zones need to be more than just chicanes to make them a home and neighbourhood (we need neighbours especially in a crisis) and very little on diversity and disability and age. Can't see how chicanes reduce social exclusion when they don't address how they will promote neighbourliness.</p>	<p>Comments noted. The SPG includes references to inclusive design and encouraging social interaction through good design. This needs to be highlighted using examples of best practice. It is a broad issue and related to human behaviour that design has an important role to play in this.</p>	
<p>East Lothian Play Association</p>	<p>Yes, there is no mention of a child or children in the introduction. In the whole document 'child' appears once, and 'children' once; there are almost 100 mentions of vehicles. I welcome the focus on Home Zones. Para 1.9 - I would suggest adding 'playing' after 'walking' in this sentence as play is intrinsic to the Home Zone concept.</p>	<p>Comments noted. The SPG should put greater emphasis on designing for children and this will be addressed in the revised draft SPG, including references to ELC play policy 2017. The section on 'home zones' is to be re-written and suggestions for rewording are welcomed. Comments on walking and cycling and connectivity noted.</p>	

	Shared surfaces and Home Zones will form part of a well-connected network of public spaces which will encourage walking and cycling.		
SNH	There is no sense of the vision for design in East Lothian, including how new development should respond to the existing strong identity of settlements. Paragraph 1.11 gives a summary of shared surfaces and Home Zones, The principles set out there are positive but they are not necessarily reflected in the choice of images used later in the document. SNH recommend that the overall content of supporting images are reviewed to ensure that they show current and recent good practice and if possible reference examples that reflect the scale of built form, the character and identity in and around East Lothian settlements.	The revised SPG will include more references to the adopted LDP 2018 and its policies (including DP1 and DP2) to emphasise that new development will be required to respond more positively to the existing strong identity of settlements. It is accepted that the SPG should incorporate better visual examples of good practice.	
Anonymous 1	All sounds great but doubt it will happen	Comment noted. The Design Standards SPG aims to improve the standard of development in East Lothian. The design principles are meant to be applied on a case by case basis, and whilst locational factors influence the extent to which some principles are more achievable on specific sites, it remains an aspirational document encouraging best practice.	
Anonymous 2	I agree, walking and cycling should be encouraged.	Comment noted	
Anonymous 3	The SPG (from § 1.1 onwards) contains too much emphasis on "tradition" and not enough on excellence. I welcome the sections on containing the motor car. Far too many recent schemes are spoilt by inadequate, or badly sited, parking provision e.g. the Vinefields development in Pencaitland at the weekend or at most	Comments noted. Whilst parking is discussed in the SPG and recommendations are given for how to design this, parking requirement is set out in policy. The revised SPG should include more case studies/examples showing where parking	

	<p>times of the day out of school hours. Sanderson's Wynd in Tranent is one of the better examples of the application of ELC design policy. The off-the-peg quality of the houses devised by the volume developers leads to the mind-numbing blandness of these conceptually innovative schemes.</p> <p>ELC's over-insistence on "traditional" materials may also be partly to blame. It might help if greater emphasis was given to respecting the genius loci. Good planting is a current strength, and should be encouraged.</p> <p>Respect for Listed Buildings and Scheduled Monuments deserves more emphasis in the SPG to ensure that short term commercial greed does not prevail over the long-term public interest e.g. despite the archaeological evidence for an early settlement in the NE corner of the Letham development and its topography, the land has been levelled to ensure that 2 large houses could have level gardens.</p> <p>A sentence on the following lines should be added: "Where a site contains a Listed building or a Scheduled Monument, developments will be required to leave ample space in order to respect the setting of these features".</p>	<p>provision does not dominate the street scene and is coherent with the development layout. Examples of how parking and flexibility is applied to ensure it can be integrated into different housing layouts will also be discussed.</p> <p>The updated SPG is intended to be used to improve the quality of new housing developments going forward by supplementing adopted LDP 2018 policies, requiring more adaptability from volume house builders towards site design and masterplanning techniques that maximise a sites' locational and contextual potential, and referring to best practice.</p> <p>The SPG could benefit from more references to heritage in general. However, the proposed wording and especially a reference to "ample of space" is not considered to be appropriate. This is because every application will need to be considered on its own merits and often developments close to listed buildings or schedule monuments will not harm their settings.</p>	
Anonymous 4	<p>Low speeds for vehicles in housing areas obviously improves safety. But to work effectively the area nears artery roads to allow traffic in and out timeously. At the moment you just dump the traffic into a maze of streets designed to slow the traffic. This causes driver frustration and fills housing estates with slow moving delivery vans.</p>	<p>Comments noted. There is a balance to be struck between achieving desired and safe low traffic speeds, whilst at the same time retaining legibility for users. This can be achieved through better traffic calming measures, introduced to streets that do not cause unnecessary confusion for the user. This will be discussed in more</p>	

		detail in the revised SPG. The revised SPG also needs to include more references to public transport and the importance of this in reducing car usage/reliance.	
Anonymous 5	Meaningless clap trap no clue how these aspirations will be met and funded on an ongoing basis. Make the architect who designed it live there without a car and tell him to go and do the weekly shop	Comments noted. It is accepted that more detail on the implementation of some design principles is required in this SPG, including greater emphasis on the end user and liveability of housing developments.	
Anonymous 6	Please listen to local people Dunbar now has too many newbuild and it will create and is creating problems for the Community - we feel we are not listened to and it is not fair	Comments noted. The issue of housing requirements is set out in Strategic Development Plans and through the allocation of sites in the LDP 2018. It is not a matter to be addressed in this SPG.	

Question 6: Do you have any comments to make on The Design Toolkit section of the Design Standards for New Housing Areas SPG (P.4 – 9)?

Respondent	Response	Officer comment	Recommendation
Barratt Homes	No comment to make on this.	N/A	
Dementia Friendly East Lothian	I refer you to the design principles for creating dementia friendly public space as a useful tool for looking at how space is used. Much is generalisable and fits – e.g. creating a sense of comfort, legibility, familiarity etc. Art and design key to creating spaces people can use and feel good in and evidence based. https://www.housinglin.org.uk/assets/Resources/Housing/Support_materials/Viewpoints/Viewpoint25_AtAGlance.pdf	Comments noted. The revised SPG will look at these issues more closely and consider the design principles for creating dementia friendly public spaces.	Carry out additional work on the draft SPG and bring it to a future meeting of

East Lothian Play Association	This section is well laid out, concise and easy to follow. I particularly like this, para (p9) but would add 'playability' after walkability. Children's play happens when they move around from space to space, en-route (e.g. home-school), or as a play formation. It develops confidence, efficacy, independent mobility, physical exercise. "Streets must welcome the user and offer a rich experience when moving through them. Design treatment such as street width, enclosure, landscaping and boundaries all impact upon the user and their sensory experience. Development layout must allow walkability and memorability."	Comments noted and support welcomed. Additional work will be carried out on the revised SPG in order to include more detail on designing for children and play.	ELC where approval will be sought to re-consult on the revised version
HES	Welcome the recognition in the guidance of the value of the historic environment in contributing to sense of place, and the undertaking to make use of historic assets and development patterns in designing new development.	Comments noted	
SNH	SNH support the requirement to integrate natural features and the emphasis on movement of people rather than cars. Both of these are aspects of successful places. However, the illustrations currently used in this section do not clearly convey these principles e.g. the photos on p9, in general, do not illustrate places that are welcoming and which make good use of landscaping to help people orientate themselves. We are unclear on what is meant on p7 by " <i>Design areas that can be car free and connect public spaces, footpaths and green networks where active travel is prioritised and movement is safe.</i> " This reads as if green networks are where active travel would be safe rather than designing in safe movement as a general principle.	Comments noted. The revised SPG will include more useful examples of good practice to illustrate the principle. It is accepted that the quoted text should confirm that designing in safe movement would be a general principle that the SPG should include.	

Anonymous 1	If none of this is policed or enforced by the Planning Dept. nothing will happen.	Comments noted. The issue of enforcement (of planning conditions) is not a matter to be addressed in the SPG.	
Anonymous 2	This seems to encourage more of those cheerless commuter developments shown in the pictures.	Comment noted. The revised draft SPG will include more examples of best practice.	
Anonymous 3	I support this section and references to Designing Streets. The SPG should be better focussed on relating new development to traditional settlements. The setting of historic buildings, trees and landscape features may not be given sufficient emphasis in the SPG as it stands. The most obvious place for an adjustment is the first paragraph of the section headed "Establishing a Development Layout." How about extending the first sentence with the words ". . . settlement or site, with scrupulous respect to the character of the area and the setting of its old buildings and historic features." I'm sure there are other places where the point could be driven home.	Comments noted. The SPG could benefit from more references to heritage in general. The suggested wording may be unnecessary since the second sentence of this section states that the design "...should integrate well by making use of historic development patterns or land uses, heritage assets and features if the natural environment including green and blue infrastructure".	
Anonymous 5	No greenery no play areas no sense of any thought to transport or community	Comments noted. Pages 10-11 of the SPG refers to the need for open space, green networks and positive impacts on biodiversity. More emphasis on landscape and public transport within the revised SPG will be made.	

Question 7: Do you have any comments to make on the Open Space, Green Networks and Biodiversity section of the Design Standards for New Housing Areas SPG (p.10 – 11)?

Respondent	Response	Officer comment	Recommendation
Barratt Homes	In terms of biodiversity we should be promoting the use of native species etc. when designing any new green infrastructure.	Comment noted. The revised SPG will include more examples of landscaping and species that can be used when designing developments	Carry out additional work on the draft SPG and bring it to a future meeting of ELC where approval will be sought to re-consult on the revised version
Dementia Friendly East Lothian	Benches? Long straight paths hard to navigate etc.	Comments noted. SPG refers to street furniture, inclusivity for disabled persons, and where to place this sort of feature (see appendix 1). Revised SPG will include more detailed guidance on designing footpaths and shared multi-user routes.	
East Lothian Play Association	Excellent section - could the pictures offered by a bit more exciting? They are very flat! If they showed more interesting topography it would be an easy-win in the guidance.	Comments noted. The revised SPG will include more relevant examples in this section.	
SEPA	SEPA support the statement identified in the section under Open Space, Green Networks and Biodiversity in regard to Sustainable Drainage Systems (SUDS) providing a range of benefits. They also support the recognition that these benefits are fully realised when SUDS are included as part of the overall useable open space within housing areas. SEPA support the inclusion of a dialogue of the benefits of SUDS and their integration in the design of new housing.	Comments noted and support welcomed. The revised Design Standards SPG will include more examples of SuDS design, linking with the draft SuDS SPG.	
SNH	Page 10 includes a requirement that <i>“Developments must maximise open space in all areas.”</i> This implies extent rather than quality and assumes that new will be	Comments noted. The SPG highlights the importance of open space as a general design principle, and does not seek to priorities	

	<p>needed in all cases whereas some small developments may be better contributing to improvement of existing open space. These different scenarios are allowed for in LDP policies DP1, DP2, DC10 and OS3 which are quoted in this section. This requirement should be reviewed so it better aligns with the LDP approach of a <i>“network and hierarchy of open space”</i> that responds to context and qualities of sites rather than a blanket requirement to maximise open space in all areas.</p> <p>SNH welcome the requirement on page 11 to <i>“Use green roofs or roof gardens within as many individual plots as possible and close to open space to create a continuous habitat.”</i> Measures such as this should deliver a number of benefits, including contributing towards the success of the Pollinator Strategy for Scotland 2017-2027.</p>	<p>quantity over quality. Areas of existing open space may be improved through off-site contributions from new developments in line with Policy OS3.</p> <p>The approach to integrating open space within new developments will be clarified and aligned with the LDP policy of a <i>“network and hierarchy of open space”</i> that responds to context and qualities of sites rather than a blanket requirement to maximise open space in all areas.</p>	
Anonymous 1	<p>All good ideas. SUDS need good management to avoid being a horrid muddy puddle and proper fencing to keep them safe for children. Huge problems getting Miller Homes to deal with the SUDS at Meikle Grove in East Linton. Dreading the next one at Pencraig Hill, another mess with sheep fencing round it I expect. Green corridors need to be wide to be any use to wildlife.</p> <p>Cycle paths must be kept clear of debris to be useable Playgrounds are a big burden on residents. We should not be building on good arable land.</p>	<p>Comments noted. The SPG makes reference to the draft SuDS SPG which will provide even greater level of detail on the design and management of SuDS into new developments. The Design Standards SPG will align with this new SPG in terms of recommendations and best practise for safety and management.</p> <p>Whilst more detailed guidance on green corridors is included in the Green Networks SPG, the revised design SPG will also include some references on how these can be integrated into new developments.</p> <p>Land allocated for housing has been assessed during the LDP 2018 preparation process which culminated with the independent LDP</p>	

		<p>examination that looked into a number of issues, including the loss of natural land. It is accepted that cycle paths must be designed well in terms of surface material and gradient so that they can be safely used by all. Maintenance must also be carried out to ensure they remain useable and safe. The SPG makes recommendations for providing information at the planning application stage on any maintenance responsibilities and agreements during the lifetime of a development. Well-designed and sited playgrounds should enhance the visual amenities of their localities and there is no evidence to suggest that these facilities are unwanted by future residents.</p>	
Anonymous 2	Sounds sensible, but what I see in the pictures is basically a large lawn, which doesn't encourage biodiversity.	Comments noted. The revised SPG will include more relevant examples in this section.	
Anonymous 3	A valuable section which forces developers to raise their sights to the wider context. ELC are to be commended for the proactive way in which their officers have promoted these policies. There have however been some drastic failures, particularly along the coast (Craigielaw and Archerfield, although pedestrian access to the latter has been defended). Down with gated communities!	Comments noted and support welcomed. The success of failure of specific schemes is not an issue that the SPG can address, however references to examples of best design practice are beneficial to designers, including as visual aids.	
Anonymous 4	On our site the SUD is usually dry because the existing drainage off and around the A1 is poorly maintained and often blocked. In periods of heavy rain the local paths and green areas flood before the water gets anywhere near it.	Comments noted. The SPG aims to highlight that SuDS features have multiple benefits and that their placement must form part of the design process from the outset. The Council is preparing a separate SuDS SPG that aims to highlight the benefits of particular SuDS	

		features for particular locations. The revised Design Standards SPG will include examples of best practice. Comments on existing SuDS features and their performance cannot be covered in this SPG.	
Anonymous 5	How does this relate to section 6 where there is no green ,, all the SUDs I have seen look like a very sad pathetic approach to the problem with no imagination	Comments noted. The SPG aims to highlight that SuDS features have multiple benefits and that their placement must form part of the design process from the outset. The Council is preparing a separate SuDS SPG that aims to highlight the benefits of particular SuDS features for particular locations. The revised Design Standards SPG will include examples of best practice.	
Anonymous 6	Do not take down trees Do not build on marshing ground Take notice of the drainage problems newbuild is making in Lochend woods Dunbar Please do not pass planning permission for more housing in Dunbar especially near the woodlands	Comments noted. Housing requirements are set out in Strategic Development Plans (SESplan) and the LDP in order to meet demand and population growth. This issue is not relevant for the SPG. Any constraints that are associated with ground conditions will need to be considered and addressed.	

Question 8: Do you have any comments to make on the Public Art section of the Design Standards for New Housing Areas SPG (P.12)?

Respondent	Response	Officer comment	Recommendation
Barratt Homes	It's quite a vague section in that what constitutes public art? Should it be a bit more prescriptive and specify that public art should be relevant to the history of the site/town or neighbouring area? Are the examples shown good or bad – presumably good? Is this a requirement for all developments? We would consider	Public Art can add to local identity and sense of place, and aid wayfinding. Public art can be incorporated into the streetscape through bespoke design of street furniture (such as shelters, seating, railings or other elements). The revised draft SPG will include more	Carry out additional work on the draft

	that all sites should be considered on its own merit and that some sites don't benefit from the inclusion of public art.	examples of the wide variety of design approaches that can be successful. Location and context remain important factors and whether it is appropriate to include public art.	SPG and bring it to a future meeting of
Dementia Friendly East Lothian	Yes very important but it can also be traditional - need a mix. Can help people navigate too, especially as buildings etc. change. Much better if it means something to people not just stuck at the entrance to a new estate.	Comments noted and support welcomed. The placing of public art in new developments can aid legibility and improve sense of ownership and community spirit.	ELC where approval will be sought to re-consult on the
East Lothian Play Association	Again, perhaps better choice of images would help to set the scene better - the choices shown seem a bit random but images are really important. If the developer doesn't really 'get' what you mean, the images shown will have a big influence. There should be mention of careful commissioning process so that the work has some meaning and authenticity to the site and community. Other functions that public art has, such as creating a landmark, gathering space, place to play should be mentioned. Public art has the possibility of anchoring the new development in the previous life /history of the site.	Comments noted. Better choice of images will be included in the revised SPG. It is agreed that careful commissioning process will help to ensure that the work has some meaning and authenticity to the site and community. Comments about other functions that public art has are noted.	revised version
Anonymous 1	It's a nice idea but difficult to implement.	Comment noted. More clarity on implementation will be provided in the revised SPG.	
Anonymous 2	Waste of money	Comment noted. The Design Standards SPG aims to improve the standard of development in East Lothian. The design principles, including encouraging public art, are meant to be applied on a case by case basis, and whilst locational factors influence the extent to which some principles are more achievable on specific sites,	

		it remains an aspirational document encouraging best practice.	
Anonymous 3	<i>De gustibus non disputandum est.</i> A tricky policy, but worth pursuing. There are some local examples of public art in new developments. This section of the SPG is a useful way of keeping the private sector up to the mark. Should the guidance not be rounded off with a sentence saying "ELC will require developers to consider incorporating some public art into all new developments." Would officers spark on the issue if they had a prompt of this sort? When is ELC going to commission some public art on its own account?	Comments noted. There is no policy in the LDP that would require developers to consider incorporating public art in new developments. However, the SPG should encourage developers to consider incorporating some public art into larger developments where appropriate. ELC still oversees the Percent for Art scheme (enabled by the 2008 LDP) that requires developers to allocate a percentage of their capital spend to fund public artworks and involve an artist in any building project as early as possible.	
Anonymous 4	Public Art in housing sites doesn't add much, it just takes up space and introduces opportunities for graffiti and vandalism. The money would be better spent clearing drains and getting rid of litter.	Comments noted. Public art in new developments can, if appropriately designed and installed, add excitement and intrigue to housing developments. It can also provide many opportunities including social interaction, education, walking etc. Whilst it is not going to be achievable or appropriate on every new development, it is something that the Council is encouraging. Comments on funding of clearing drains and litter collection are not relevant to this SPG.	
Anonymous 5	Waste of money mostly tends to be pathetic tokenism do not know of any example that is of note Waiting with hope on the DUNBAR bear	Comments noted. Public art in new developments can, if appropriately designed and installed, add excitement and intrigue to housing developments. It can also provide many opportunities including social interaction, education, walking etc. Whilst it is not going to be achievable or appropriate on every new	

		development, it is something that the Council is encouraging.	
Anonymous 6	I like public art and it should be encouraged	Comments noted.	

Question 9: Do you have any comments to make on the Detailed Design Techniques section of the Design Standards for New Housing Areas SPG (P.13)?

Respondent	Response	Officer comment	Recommendation
Barratt Homes	Whilst the delineation of private and public realm is important, the guide should give more detail on the setting out of spaces relative to the built form i.e. an example of a mews street, residential street, courtyard setting etc. With regards to high boundary treatments to the public realm, this cannot always be avoided and the material finish and landscaping can play an important role in softening the street scene.	Agree that the SPG should provide more detail on the setting out of spaces relative to the built form i.e. an example of a mews street, residential street, courtyard setting etc.	Carry out additional work on the draft SPG and bring it to a future meeting of ELC where approval will be sought to re-consult on the revised version
Dementia Friendly East Lothian	Same as above. Many of them are really not good for people with a whole range of disabilities going by the photos.	Comments noted. The updated SPG will include more references to designing for disabled persons, represented by illustrations of best practice.	
East Lothian Play Association	N/A	N/A	
SNH	Support the requirement for detailed plan of landscape strategy.	Comments noted. The Council continues to support the provision at an early stage of a landscape strategy for new developments, designed in from the beginning as an integral part of the development, and for this to be	

		implemented in accordance with any approved plan.	
Anonymous 1	N/A	N/A	
Anonymous 2	Sounds sensible, but it only makes those awful new developments a little bit less bad.	Comments noted.	
Anonymous 3	<p>Somewhat perfunctory. Walls merit wider discussion, covering:</p> <ul style="list-style-type: none"> - protection of historic walls. ELC seems to be selectively blind to the importance of these features. An articulated maze of old boundary walls has been retained in the car park behind TESCOs in Haddington. But in Dunbar and N Berwick private developers have been blithely allowed to sweep away important remnants of the old town boundaries. At Tenterfield, in Haddington, the Council has allowed itself to breach an extremely important defining wall, possibly in defiance of ancient laws prescribing death for such behaviour. - the sensitivity of the now ubiquitous use of wooden boundary fences. The type which uses horizontally laid planking is peculiarly intrusive and obnoxious. - heights, which are all too often exceeded, a practice which is particularly obnoxious - and increasingly common - in CAs. <p>Summary. The SPG should at least get these issues into the open.</p>	Comments noted. The SPG should acknowledge that historic stone walls are an important architectural element of the built environment in East Lothian and that opportunities to integrate and/or improve such existing elements should be taken. The revised SPG will provide more detail on this matter, and in general the contribution that heritage assets can make to new developments. The Council's Cultural Heritage and the Built Environment SPG will also be referred to.	
Anonymous 4	Ok as far as they go but they think of the site as a discrete area without thinking about the	Comments noted. The SPG looks at the site as a discrete area but also considers development	

	surrounding area e.g. orientated buildings to provide views of green areas out with the site and to limit overlooking property on neighbouring developments.	impact on the surrounding area (see p5 of the SPG – Establishing a Development Layout).	
Anonymous 5	Looks OK	Comment noted.	
Anonymous 6	Do not light the paths in Lochend Woods Dunbar	Comment noted. Regarding lighting, there are national standards that must be complied with in terms of lighting requirements. In new developments, it is important that at least one well-lit walking route is provided to a new development (particularly where there are schools and shops etc.) but not all areas are required to have the same level of lighting. SPG will include more examples of how to provide lighting and the various techniques that can be employed.	

Question 10: Do you have any comments to make on the Designing Space between Buildings section of the Design Standards for New Housing Areas SPG (P.14)?

Respondent	Response	Officer comment	Recommendation
Barratt Homes	The use of shared spaces within the public realm is a good way of creating active streets and useable public realm. However, do the photographs not contradict this by showing a separate footway?	Comments noted. The revised SPG will include more relevant examples and diagrams in this section.	Carry out additional work on the draft SPG and bring it to a future meeting of
Dementia Friendly East Lothian	Visibility? Contact? Interpreting shared space can be a problem for people with dementia.	Comments noted. The SPG aims to encourage developments that are legible and memorable through the use of various design techniques, including small recognisable spaces, feature/landmark buildings etc. Where shared surfaces are to be provided, detailed consideration must be given by designers on the impacts of this approach on all users. It may be considered	

		<p>appropriate for shared surfaces to include the use of e.g. tactile paving to indicate the change in condition to visually impaired pedestrians.</p> <p>The revised SPG will look at these issues more closely and consider the design principles for creating dementia friendly public spaces.</p>	<p>ELC where approval will be sought to re-consult on the revised version</p>
East Lothian Play Association	N/A	N/A	
Anonymous 1	Good ideas.	Comment noted.	
Anonymous 2	No objections. However, I think the main problem is that high density developments produce a lot of traffic. It would be much better to just limit the number of people in an area.	Comments noted. The LDP 2018 policy DP3 covers the issue of density. This is set at a minimum 30dph in order to maximise locational benefits. The issue of housing requirements to meet demand and population growth are not relevant for this SPG. Also it should be noted that most of the current developments in East Lothian are not of high density.	
Anonymous 3	ELC has for some years now been actively disinvesting itself of small communal spaces for whose upkeep it is responsible. This is understandable as a cost saving measure. But the Council encourages common spaces in new development, apparently discounting the considerable maintenance costs which will fall on householders.	It is not a role of the SPG to encourage less common ownership. However, any issues of common maintenance costs that could have a negative impact on the lasting quality of any new developments should be taken into consideration when making planning decisions.	

	Perhaps the SPG should encourage less rather than more common ownership, in the interest of keeping on-going common maintenance costs to the minimum.		
Anonymous 5	Yes I like this but must be supported by parking provision and transport links	Comments noted.	
Anonymous 6	Too much LED lighting with glare and it is not necessary	Comments noted. Street lighting has positive impacts such as improving safety and natural surveillance, with recent technological advances improving energy efficiency. Comment noted. There are national standards that must be complied with in terms of lighting requirements. In new developments, it is important that at least one well-lit walking route is provided to a new development (particularly where there are schools and shops etc.) but not all areas are required to have the same level of lighting. SPG will include more examples of how to provide lighting and the various techniques that can be employed. The revised SPG will provide greater clarity on how to design and integrate this into new developments.	

Question 11: Do you have any comments to make on the Parking and other Road Features section of the Design Standards for New Housing Areas SPG (P.15)?

Respondent	Response	Officer comment	Recommendation
Barratt Homes	Our concern here is that the guidance suggests that the preference for detached garages and terraced units and is not necessarily in line with market demand that should include integral garages. This section needs to be amended to take account of integral garage units.	Amend this part of the SPG to include more detail on internal garages	Carry out additional work on the draft

Dementia Friendly East Lothian	As above - and grit bins have to be used they are not just ornaments. More emphasis on impact on ability get around.	Comments noted. The placing of grit bins is a matter that the SPG aims to address to ensure that they are used but do not cause a safety concern. The SPG aims to highlight the importance of designing for movement in particular walking and cycling and multi-user routes and surfaces. More emphasis on this will be added to the revised SPG.	SPG and bring it to a future meeting of ELC where approval will be sought to re-
Homes for Scotland	<p>HfS acknowledge the fundamental principle of reducing the visual and physical impact of motor vehicles from the residential streetscape, but they question whether this aligns with the expectations of current and future home buyers, and ultimately the aim of meeting the needs of the customer and creating high-quality places where people want to live. The requirement to provide parking to the rear of buildings where it is out of sight is prohibitive of the incorporation of integral garages, which we understand to be a key feature of many new house types and a growing trend amongst customer expectations. Also, there is the potential that such a standard would have an impact on user accessibility, security and surveillance.</p> <p>The standard limits the potential for occupiers to accommodate affordable charging infrastructure within their properties/garages.</p> <p>HfS are also concerned about</p> <ol style="list-style-type: none"> a. The 3.5m depth limitation on front gardens which implies that driveways will not be acceptable and is prohibitive of front of building parking. When this is considered within the context of the required 18m 	<p>The general principle is to encourage the use of rear parking where possible. This is however dependent upon the specific design of the new development. The SPG states in Appendix 1 para 2.19 curtilage parking will not be acceptable unless this is a justified design feature.</p> <p>It is not clear why the rear parking requirement should limit the potential for occupiers to accommodate affordable charging infrastructure within their properties/garages. It is not unusual for garages to be located at the rear of the properties/plots. However, the revised SPG should provide more guidance on EV charging points.</p> <p>The SPG refers to front garden length of no more than 3.5m (Appendix 1 - Defensible Space para 2.23). This is seen as a design technique that offers advantages such as providing occupiers with some defensible space but ensuring that there is activity at street level by keeping set-back of building lines to a minimum. This requirement does not imply that driveways will not be acceptable.</p> <p>The SPG requires that visitor bays are clearly marked in order to avoid situations when these</p>	consult on the revised version

	<p>distance between adjacent windows, a considerable amount of hard landscaping would be required to fill any void between building facades.</p> <p>b. Visitor bays will, more often than not, be utilised by occupiers where possible, defeating the purpose of the proposed design intention and aims of the guidance.</p> <p>c. Prescriptive standards fail to accommodate the need for alternative parking solutions which seek to meet the varying needs of occupants across a range of housing tenures. This may simply not be appropriate for particular developments.</p> <p>The design standards should align with the wider principles contained within associated national guidance such as Designing Streets and the SCOTS National Roads Design Guide to ensure there is a level of consistency in implementation across Scotland. For example, the requirement of ‘primary streets’ or the co-location of footpaths in addition to ‘shared surfaces’ is seen as being unnecessary and one that hinders the intent behind Designing Streets. These standards should be fully adopted by all stakeholders within the process, to ensure there is no conflict between the design principles and what</p>	<p>spaces are utilised by residents and not their visitors.</p> <p>The SPG aims to encourage innovative design and flexibility within the context of broadly accepted parameters and principles, and at the same time it avoids overly prescriptive requirements.</p> <p>Designing Streets advises that road hierarchies based on terminology such as local distributor/local access roads should no longer be used and the SPG will follow this advice. The requirement for footpaths as part of shared surfaces and the requirement to keep them separate from streets is considered appropriate when traffic speeds exceed 20mph. In areas where speeds can be kept below this through design, a separate footpath may not be needed. However, it may be considered appropriate for shared surfaces to include the use of e.g. tactile paving to indicate the change in condition to visually impaired pedestrians.</p> <p>Comments noted on referring to other national guidance such as the SCOTS National Roads Design Guide. The revised SPG will include more references to this and other best practice guidance.</p>	
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	<p>can be approved by highways departments/roads engineers.</p> <p>Standards and guidance must also provide flexibility to be able to draw out the unique qualities of individual sites. Prescriptive guidance offers consistency in interpretation and application, but some leeway/flexibility is needed to draw out particular features of a site to enable high-quality design and place-making.</p>		
East Lothian Play Association	N/A	N/A	
Anonymous 1	There will never be enough car parking unfortunately.	Comments noted. Whilst parking is discussed in the SPG and recommendations are given for how to design this, parking requirement is set out in policy. The revised SPG should include more case studies/examples where parking provision does not dominate the street scene and is coherent with the development layout. Examples of how parking and flexibility to ensure it can be integrated into different housing layouts will also be discussed.	
Anonymous 2	Makes sense, but it would be much easier to avoid the problems addressed by those measures by reducing the density. Fewer people means fewer cars and less traffic.	Comments noted. The LDP 2018 policy DP3 covers the issue of density in detail. This is set at a minimum 30dph in order to maximise locational benefits. Areas of higher density and lower density can be provided across a site. The issue of housing requirements to meet demand and population growth are not relevant for this SPG.	

Anonymous 3	Well said. Some of the problems I alluded to earlier (Vinefields and Tranent) might have been mitigated if this approach had been adopted.	Comment noted and support welcomed.	
Anonymous 4	More thought is needed about the number of cars per household. During work hours most developments look ok. But when people come home from work there frequently is not enough parking. Don't assume cars will be in the garages a lot (most?) people use their garages for storage and never put cars in them.	The SPG does not deal with parking standards and is not to prescribe any specific quantitative requirements.	
Anonymous 5	OK	Comment noted	
Anonymous 6	Allow us to park at the beach without a charge we pay enough council tax	Comments noted. Coastal car parking charges and Council Tax rates are not matters that are relevant for this SPG.	

Question 12: Do you have any comments to make on the Lighting and Safety, Waste & Other Services and Infrastructure section of the Design Standards for New Housing Areas SPG (P.16)?

Respondent	Response	Officer comment	Recommendation
Barratt Homes	More detailed design guidance on the location and expectations of waste storage facilities to ensure developers have a clear understanding of requirements would be beneficial so it is not an afterthought with designers.	Comments noted. Waste is a matter to be looked at in greater detail and ELC Waste Services are contributing to the production of the revised SPG.	Carry out additional work on the draft SPG and bring it to a future meeting of
Dementia Friendly East Lothian	Have had complaints about new lights making people feel less safe as the light isn't as good. Are they age friendly? Plus I heard that they are bad for bats etc. as they are cold and so don't attract insects, might be an urban myth of course!	Comments noted. Lighting can improve safety and the perception of safety through natural surveillance where it is appropriately installed. Recent technological advancements have led to LED lighting being used more frequently as it is more sustainable through reduced energy demand. There are national standards that must be complied with in terms of lighting requirements. In	

		<p>new developments, it is important that at least one well-lit walking route is provided to a new development (particularly where there are schools and shops etc.) but not all areas are required to have the same level of lighting. SPG will include more examples of how to provide lighting and the various techniques that can be employed.</p> <p>We are not aware of any evidence that would suggest that LED lights can have a negative impact on the perception of safety amongst elderly people. Additionally, the impact upon various species can be taken into consideration when selecting type and location of lighting.</p>	ELC where approval will be sought to re-consult on the revised version
East Lothian Play Association	N/A	N/A	
SEPA	Note our support for paragraph regarding waste and the identification of waste storage areas and collection points forming an integral part of the design process. This is important for ensuring the location of waste storage areas in suitable areas of the proposed development and minimising the likelihood of environmental impacts from poor waste management in housing areas.	Comments noted	
Anonymous 1	All good ideas but probably won't happen.	Comment noted. The Design Standards SPG aims to improve the standard of development in East Lothian. The design principles are meant to be applied on a case by case basis and whilst some are more achievable on specific sites, it remains an aspirational document. Good design will continue to be promoted by the SPG.	

Anonymous 2	N/A	N/A	
Anonymous 3	Useful. The encouragement of initially more costly lighting bulbs and systems (which reduce long term environmental impact) is not one which developers will welcome. They much prefer to install cheaper, less efficient systems which the new owners will then pay to upgrade. Good to have this safeguard, even if it is unlikely to be embraced enthusiastically by the private sector.	Comments noted	
Anonymous 4	<p>The bin storage areas are only rarely provided, more would be good. The statements about infrastructure sound ok but in practice necessary infrastructure is not provided. You have pages and pages of advice based on reducing the use of the car. I don't think the words "bus stop" have been used once. Letterboxes are needed as if they're not there people drive to the Post Office. How does that reduce the use of the car?</p> <p>Infrastructure is not bad and doesn't clutter a place. In fact, it is what makes it possible for you to live in a place and not spend your life driving to find the services you need. Completely wrong. Needs a rethink and change of direction.</p>	<p>Comments noted.</p> <p>Waste is a matter to be looked at in greater detail and ELC Waste Services are contributing to the production of the revised SPG.</p> <p>The LDP allocates sites that can be served by public transport and the design policies require this to be demonstrated through a masterplanning process. The LDP includes a number of sites for mixed use residential development with community, education and retail facilities which are (or will be) supported by the required infrastructure provision and are accessible by public transport or walking and cycling. The SPG will provide supportive guidance, including examples of best practice to enable the delivery of well-designed, well-connected and coherent places.</p> <p>The Royal Mail maintains overall responsibility for providing and maintaining post boxes, however the SPG could provide some recommendations on how these could be integrated into new housing layouts.</p>	

Anonymous 5	Ok	Comment noted	
Anonymous 6	Too much lighting Lighting too bright LED lighting causing glare into houses Developers paying for paths and lights we do not want	Comments noted. There is a balance to be struck between installing lighting to improve safety and legibility, and overly bright/poorly placed lighting that causes a nuisance. There are however national standards for lighting that must be complied with. The revised SPG will consider this matter in greater detail. In relation to footpaths, connections within a site layout are highly important for walkability and creating active, healthy, social environments. The positive impacts of these will continue to be highlighted and supported in the SPG.	

Question 13: Do you have any comments to make on the Designing Small Spaces and Areas for Recreation and Play section of the Design Standards for New Housing Areas SPG (P.17)?

Respondent	Response	Officer comment	Recommendation
Barratt Homes	The creation of spaces needs to be considered for each development site, in that different quality of spaces are more suited to different locations.	Comments noted. Each site requires a case by case basis approach including the creation of small spaces. The SPG aims to ensure that this matter is considered from the outset in order for small spaces (where provided) to be designed well, useable, and make a valuable contribution to the site.	
Dementia Friendly East Lothian	Good to see allotments, play and recreation for all ages, need for covered social space too. Think all ages. Think disability.	Comments noted and support welcomed. The SPG aims to highlight the importance of inclusive design and this will be made even clearer in the revised draft SPG.	Carry out additional work on the draft SPG and bring it to a
East Lothian Play Association	This is the main mention but is a statement and doesn't offer any guidance. "Include features of informal/formal recreational value designed as an	Comments noted. The SPG should provide more references (and guidance) on inclusive play spaces and this will be addressed within the revised draft.	future meeting of

	<p>integral part of the landscaping strategy, accommodating for the needs of those with disabilities." The history of play and recreational space in housing development is very poor, often an afterthought and created in a lowest-common denominator fashion. Let's take the opportunity to create a page of better actual guidance. A new guide to creating Accessible and Inclusive Public Play Space was launched by the Scottish Government in 2018. Would suggest that it would be possible to find some more precise and useful guidance within it (and I am willing to help to do that).</p> <p>The Minister for Children said - Accessible and inclusive play spaces help to ensure that all our children and young people, including those with additional support needs, can exercise their right to play. Accessible and inclusive play spaces also make a hugely important contribution to local communities as welcoming, social gathering places. They should be recognised as important community assets, promoting health, well-being and a sense of community. This guide should be the first point of reference for all groups in Scotland wishing to make better spaces to play. The guide can be found here https://www.inspiringscotland.org.uk/wp-content/uploads/2018/05/Free-to-Play-Guide-to-Accessible-and-Inclusive-Play-Spaces-Casey-Harbottle-2018.pdf</p>		<p>ELC where approval will be sought to re-consult on the revised version</p>
SNH	<p>Support the requirement that small spaces and areas for recreation should be flexible and suitable to host a range of uses.</p>	<p>Comments noted and support welcomed.</p>	

Anonymous 1	All this will become a financial burden on the homeowners as they will be responsible for upkeep.	Comments noted. The design principles highlighted in the SPG are intended to be applied on a case by case basis and not all will be achievable on every site. However, there is a requirement (through LDP 2018 policies) for details of maintenance arrangements to be provided at application stage. This will be highlighted more in the revised SPG.	
Anonymous 2	Sounds sensible. Even better would be LARGE spaces and areas for recreation.	The SPG should promote networks of open space which will include both large and small areas of open space.	
Anonymous 3	Modified rapture. These facilities have to be maintained. Who pays? Not the Council, presumably: but are private house owners any better placed to assume this responsibility? Small playgrounds need to be well placed and robustly designed, their siting ideally agreed with the Community Police. Some never attract the toddler client for whom they are designed. They become flash points for teenage vandalism instead. SPG to be less prescriptive.	Specific requirements for play areas is provided in Policy OS4 of the ELLDP. The SPG should include more examples of best practice to demonstrate that well placed and attractive play areas contribute towards achieving sustainable and successful places.	
Anonymous 4	Ok but where have the new allotments been provided in Dunbar? A nice paperwork exercise. Now how about doing something about implementing it.	Comments noted. The SPG aims to encourage more thought to be given during the design process to open space and areas where the community can This is recognised as not achievable on all sites as it depends on a number of factors. In addition, the revised SPG will provide greater clarity on implementation.	
Anonymous 5	Why limit front gardens to 3.5 m?	The SPG refers to front garden length of no more than 3.5m (Appendix 1 - Defensible Space para 2.23). This is seen as a design technique that offers advantages such as providing occupiers with some	

		defensible space but ensuring that there is activity at street level by keeping set-back of building lines to a minimum.	
Anonymous 6	More wildlife areas Keep finding Lauderdale and the wildflowers park people at the council	Comments noted. The SPG aims to ensure greater consideration is given at the design stage to biodiversity and providing areas where species can establish and thrive. There will also be references made in the revised SPG to the Green Network SPG.	

Question 14: Do you have any comments to make on the House Types, Tenure Mix and Affordable Housing section of the Design Standards for New Housing Areas SPG (P.18)?

Respondent	Response	Officer comment	Recommendation
Barratt Homes	This section whilst stressing the need for a mix of tenures, it does not appreciate the associated need for a variety of parking solutions. Previous sections mentions 'all car parking should be to the rear' surely a mix of tenures contradicts this in that a variety of parking solutions are required to go with the mix of tenures?	Agree that the SPG should more fully consider different parking requirements for different housing tenures.	
Dementia Friendly East Lothian	We need more affordable housing and we need the council to ensure that it is affordable and built. What about a key worker scheme? Affordable housing for all ages to help people plan ahead, e.g. to downsize and also needs to link to your plans for re provisioning health and social care and extra care housing.	More guidance on this is provided in the Affordable Housing SPG	Carry out additional work on the draft SPG and bring it to a future meeting of
East Lothian Play Association	N/A	N/A	ELC where approval

			will be sought to re-consult on the revised version
Anonymous 1	They should all be mixed together as per your guidance but this never happens.	Comments noted.	
Anonymous 2	This seems to encourage exactly all those awful developments that blight our county.	Comments noted.	
Anonymous 3	<p>Too doctrinaire.</p> <p>The SPG needs to recognise that social engineering is an art, not a science, and certainly not an end that can be reached by ticking boxes. The guidance might usefully recognise that there can be a price to pay by too great an insistence on tenure mix, both in terms of community (the social confidence and comfort of home occupiers) and the environment (inconsistent standards of maintenance).</p> <p>These costs can feed through into property values and standards of general maintenance. There could be a bill to pay.</p> <p>Pedestrian access is important, and can involve upkeep costs (for footpaths, litter collection vandalism etc.). Shortcuts for pedestrians is an attractive East Lothian characteristic. To keep and to value this tradition may not be straightforward. Elsewhere the SPG draws attention to the importance of siting and lighting of footpaths and rights of way. A cross-reference here might be useful.</p>	Comments noted. A cross-reference should be provided to other parts of the SPG to emphasise the importance of siting and lighting of footpaths.	
Anonymous 4	Great. Now how about handling the social impact and thinking about who gets the social housing. Young families, old people etc. are welcome. If you use them as dumping grounds for drug users/dealers and other misfits it's just a nuisance. Apart from the amusement provided watching the police cars trying to drive fast	Comments noted. Identifying and selecting occupants of affordable housing is not a matter for the SPG. Issues related to specific design considerations e.g. integration and tenure blindness will be covered by the SPG.	

	through the traffic calmed areas you've just written several pages about.		
Anonymous 5	I like this section especially home zones still the issue of what will replace the car is not addresses I did not see anything about charge facility for electric cars	Comments noted. The revised SPG will include more references to public transport and will also include some guidance on electric vehicle charging points	
Anonymous 6	More small flats for older people Dementia friendly housing Attractive good quality design	Comments noted. The SPG (together with relevant LDP 2018 policies) encourages a range and choice of house types and tenures aiming to meet the needs of all. This is being achieved on more recent developments, however it is recognised that greater emphasis on this is required in the SPG, and improving overall design quality using guiding principles.	

Question 15: Do you have any comments to make on Appendix 1 - Further Guidance of the Design Standards for New Housing Areas SPG (P.19 – 43)?

Respondent	Response	Officer comment	Recommendation
Barratt Homes	The guidance needs to take more cognisance of designing for streets. The need for car parking to the rear restricts the tenure and house types requirements as dictated by market demand. Each site needs to be considered on its own merit. The road design refers to homezone but is contradicted by the requirement for footpaths to be kept separate.	The requirement for footpaths as part of shared surfaces and the requirement to keep them separate from streets is considered appropriate when traffic speeds exceed 20mph. In areas where speeds can be kept below this through design, a separate footpath may not be needed. However, it may be considered appropriate for shared surfaces to include the use of e.g. tactile paving to indicate the change in condition to visually impaired pedestrians	Carry out additional work on the draft SPG and bring it to a future meeting of
Dementia Friendly East Lothian	Probably but it's too long and complicated.	Comment noted	

East Lothian Play Association	I wonder why we have a section on 'Designing for the pedestrian and cyclist.' but not on 'Designing for children' or 'Designing for generations' or 'Designing for inclusion'. P31 - again, not sure the images tell the most convincing story	Comments noted. The SPG aims to encourage inclusive design, however more references are required and the revised SPG will put greater emphasis on designing for children (including references to ELC play policy 2017) and the elderly. The revised SPG will include more relevant examples of best practise.	ELC where approval will be sought to re-consult on the revised version
SNH	Appendix 1 is largely a reiteration of policy and principle set out elsewhere, there's nothing specific to East Lothian and assets / constraints / opportunities characteristic of the area. SNH are not clear of the benefit of reproducing this information here and suggest that it would be more useful to present further guidance on design standards in the context of what should be delivered and secured in East Lothian.	The revised SPG will avoid these reiterations and will focus on design standards in the context of what should be delivered and secured in East Lothian.	
Anonymous 1	N/A	N/A	
Anonymous 2	N/A	N/A	
Anonymous 3	Valuable, but requires a separate mini-essay. Another time, maybe. ELC's commitment to Designing Streets is admirable.	Comments noted.	
Anonymous 4	Again, bus stops? post boxes? grit bins? litter disposal? areas for bins? Too much focus on making a pretty looking site and not enough thought about providing the necessities of everyday life. If you want to reduce traffic why not provide nurseries? Every morning cars full of little children flood out of the housing estates to	The LDP includes a number of sites for mixed use residential development with community, education and retail facilities which are supported by the required infrastructure provision. The SPG will provide supportive guidance, including examples of best practice to	

	ferry them to yet another essential bit of infrastructure you seem to have ignored.	enable the delivery of well-designed and coherent places.	
Anonymous 5	Sorry too complicated for to add meaningful comments	Comment noted.	
Anonymous 6	Please stop any more newbuild in Dunbar please please	Comments noted. Housing requirements are set out in Strategic Development Plans (SESplan) in order to meet demand and population growth. These issues are not relevant for this SPG.	

Question 16: Do you think the Design Standards SPG will have any positive or negative impacts on any groups with protected characteristics under the Equality Act 2010 and if so what? These groups are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Respondent	Response	Officer comment	Recommendation
Barratt Homes	We're concerned with the parking guidance proposed and the impact that this will have on user access, security and surveillance. Good development design can incorporate parking to the front and should be considered on a site-by-site basis. Many of the sections within the guidance are vague and can be open to too much interpretation. This applies to both the designer and the planning authority.	Comments noted. The SPG does encourage rear parking as it offers many benefits. However, it is recognised that this is not appropriate in all locations, and there will need to be some flexibility in this. Furthermore, some level of interpretation is required by designers as it is not the intention of the SPG to set restrictive design requirements to be applied to all development types in all locations as they need to be approached differently depending upon context and specific site opportunities and constraints	Carry out additional work on the draft SPG and bring it to a future meeting of ELC where approval
Dementia Friendly East Lothian	I think it may have negative impacts I can't see much in the way of positive impacts. It needs a full assessment on the basis of age and in particular 75 plus and 90-plus. It would be ageist to ignore people because of their age. I have referred to the need for dementia	Comments noted. The revised SPG will look at these issues more closely and consider the design principles for creating dementia friendly public spaces.	

	<p>friendly design principles and more focus on the impact of what is proposed on different groups, including other people with different disabilities.</p> <p>There is also no consideration on the grounds of gender and who is accessing and using public space, often women. A number of older people and women have commented that the new lighting makes them feel less safe, including from falls or crime.</p>	<p>Lighting can improve safety and the perception of safety through natural surveillance where it is appropriately installed. Recent technological advancements have resulted in LED lighting being used more frequently as it is more sustainable through reduced energy demand. We are not aware of any evidence that would suggest that LED lights can have a negative impact on the perception of safety amongst elderly people and women.</p>	<p>will be sought to re-consult on the revised version</p>
East Lothian Play Association	<p>Yes positive and I think the overall feel of the Design Standard is good and the outlook is inclusive. I would suggest more attention however to principles of inclusive design is warranted,</p>	<p>Comments noted. The SPG aims to encourage inclusive design, however more references are required and the revised SPG will include designing for children and the elderly.</p>	
Anonymous 1	<p>These houses are all too expensive for a wide section of the population. We need more small houses for old people to downsize into.</p>	<p>Comments noted. The SPG seeks to provide more guidance on house tenure mix and designing for the elderly. Affordable housing requirement is set at 25% in the LDP and this is not a matter for this SPG unless it impacts on integration and tenure blindness.</p>	
Anonymous 2	N/A	N/A	
Anonymous 3	<p>Generally positive but, as noted, these social objectives need to be approached as an art, not a science.</p>	<p>Comments noted.</p>	
Anonymous 4	<p>I think they disadvantage everybody in those groups who wants to catch a bus, post a letter, be free of litter and not have to climb over bins.</p> <p>Seriously, standards that keep saying they want to reduce the use of the car and do nothing to provide facilities where people live so that they don't have to</p>	<p>Comments noted. The LDP includes a number of sites for mixed use residential development with community, education and retail facilities which are supported by the required infrastructure provision. The SPG will provide supportive guidance, including examples of best</p>	

	drive are doomed to failure. My overall impression is that these standards pay lip service to some good ideas. Very little, if any, thought has been given to achieving the desired end result.	practice to enable the delivery of well-designed and coherent places	
Anonymous 5	Improve public transport drastically so that someone 2 miles from north Berwick centre can get to and back home from the station after working 8-9 hours in Edinburgh how many busses from the station after 7pm	Comments noted. The LDP allocates sites that can be served by public transport and the LDP's design policies require this to be demonstrated through a masterplanning process. Also, the LDP 2018 Policy T1 set out general development location requirements for new developments to be located on sites that are capable of being conveniently and safely accessed on foot and by cycle, by public transport as well as by private vehicle. The revised SPG will include more references to how to design for public transport including bus routes. However, frequency of bus services is not a matter for this SPG.	

Question 17: Additional or general comments

Respondent	Response	Officer comment	Recommendation
Barratt Homes	N/A	N/A	
Dementia Friendly East Lothian	This is really important and you consult over a very short period with a lot of technical stuff. I have not been able to fully involve different groups. I don't think is good enough and I hope there will be some follow up with communities about these proposals. From what I have been able to do, there is much criticism of EL: housing. Every group I run complains about how it has been handled, the sense of loss of community, being	Comments noted. The Design Standards SPG aims to provide easy to understand visual examples of design principles. It also includes technical detail where required in order to be used as a design tool to ensure consistency and compliance with other relevant standards and policies, and to remove ambiguity. The consultation period on all SPG is carried out	Carry out additional work on the draft SPG and bring it to a future meeting of

	<p>isolated in new housing, problems getting into town (read across with your town centre plan), lack of affordable housing and lack of housing choices for older people. People feel new housing is not what it should or could be. This document doesn't inspire much hope. Which is a shame as I'm sure you want to. Is there a way we can help so our involvement is more constructive? Or is all this decided anyway?</p>	<p>over a 6-week period which is generally accepted as achieving a balance between allowing sufficient time for comments to be made as required by legislation, and for internal Council targets to be met. In order to inform people of the consultation period, publicity is carried out by placing a notice in the East Lothian Courier, creating a dedicated page on the Council's website linking to the Consultation Hub survey, and posters placed in public libraries across East Lothian. Over the consultation period a number of drop-in sessions were held for face to face discussions with ELC staff. There will be a further opportunity to comment on the next draft Design Standards SPG in due course. Also, the Council may choose to adopt a more targeted consultation approach for the forthcoming consultation.</p>	<p>ELC where approval will be sought to re-consult on the revised version</p>
East Lothian Play Association	<p>Could you check the www.cabe.org.uk in the reference section (it took me to a gambling site!) CABE closed a few years ago. It would be good to add to ref list: https://www.inspiringscotland.org.uk/wp-content/uploads/2018/05/Free-to-Play-Guide-to-Accessible-and-Inclusive-Play-Spaces-Casey-Harbottle-2018.pdf</p>	<p>Comment regarding adding reference to guidance will be considered for the revised SPG. References to CABE will be removed for the next draft SPG.</p>	
Anonymous 1	N/A	N/A	
Anonymous 2	N/A	N/A	

Anonymous 3	<p>My main concern is with the way ELC's once admirable record in environmental conservation, particularly of the historic built environment, has been allowed to slip. The SPG's concern with excellent design as an opportunity to reverse this tendency. I see this as a legitimate and important concern, not just in aesthetic or architectural terms, but in terms of the economic and social well-being of the county. I hope some of my comments may have been acceptable and, perhaps, even helpful in this respect.</p>	<p>Comments noted. It is accepted that the SPG could benefit from more references to heritage and the historic built environment of East Lothian.</p>	
Anonymous 6	<p>Please stop any more new build in Dunbar Please save money by not lighting everywhere including the woods</p>	<p>Comments noted.</p> <p>Regarding lighting, it is often necessary to require the installation of some lighting on areas leading to new developments where for example there has not previously been a regularly used footpath. This is in order to improve safety for users including children. There are national standards for lighting that must be complied with. At least one route into a new development must be lit, particularly where this leads to a school and/or shops. The revised SPG will include more examples of how to provide lighting without negatively impacting upon biodiversity.</p> <p>Housing requirements are set out in Strategic Development Plans (SESplan) and the LDP in order to meet demand and population growth. These issues are not relevant for this SPG.</p>	

Other responses

Respondent	Response	Officer comment	Recommendation
Anonymous 7	<p>Having had a quick look at the draft guidance on design standards for new housing schemes I could not find any reference to accommodating buses in new development. It is crucial that we do so as part of moves towards more sustainable travel. At his request at a Bus Forum meeting I provided a note to ELC Senior Transport Officer some time ago with my thoughts on the subject as former REBUS chairman and non-councillor member of the SEStran board. I understood that these would be considered by the council and the relevant parts incorporated in guidance or in the transport strategy. I don't think that anything is in the transport strategy and if it is not in strategic guidance either there will be carte blanche for developers to ignore buses. I attach for your information what I sent to ELC Senior Transport Officer.</p>	<p>Comments and attached guidelines noted. It is recognised that the SPG does not give a clear enough message that new developments must be designed around public transport, walking and cycling. These matters, including integrating buses and bus routes into new developments require greater detail to be provided in the SPG, which will be addressed within the revised draft.</p>	<p>Carry out additional work on the draft SPG and bring it to a future meeting of ELC where approval will be sought to re-consult on the revised version</p>