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East Lothian Local Development Plan 2018 Supplementary Planning Guidance – Countryside and Coast

Responses from Countryside and Coast Supplementary Planning Guidance consultation 2019

Thirty three members of the public responded to the consultation, 29 through the Consultation Hub and 4 via email. The majority of members of the public stated they were residents of East Lothian's coastal or countryside areas, however a fair number of responses were also received from landowners and owners of countryside or coastal businesses.

Of the key agencies SNH, HES, Scottish Water and SEPA made comments, as did North Berwick Community Council. Comments were also received from planning agents on behalf of developers and landowners.

We asked respondents on the Hub how they had heard about the consultation. Half said they had heard about it by word of mouth, a quarter via email to their organisation, and a further quarter by Twitter, Facebook or other social media. None said they had become aware of it by newspaper report or advert, the Hub itself, the Council Committee web pages or any other means.

We asked on the Hub (the way most people responded) how easy it was to respond to the consultation. Only around a quarter said it was easy. Comments included

- the documents themselves were too long and complicated
- scepticism about whether the public's views would be taken on board
- that we had not reached out enough (i.e. the survey was stumbled upon by chance)
- it is hard to refer to the source documents; text referred to could usefully have been added alongside the question itself
- a summary at each point of the survey would have been useful
- a simple yes or no questions would have helped guide the response
- the survey was too complex and should have had fewer questions
- use plain English

The consultation was advertised in the newspaper, on social media, on the Council's website and Consultation Hub, as well as sent via email to the Policy and Strategy team mailing list. The Council does keep channels of communication under review and the team looks to improve its means of engagement. The team accepts it is hard to cross-refer to documents, especially if the respondent are using a mobile phone. Adding the relevant text/diagrams alongside the question will be considered for future consultations. Summaries could also be considered however there is a risk of missing out something that may be

important to an individual. The documents are unavoidably long, as they are intended to provide a large amount of information on different areas. The team aims to provide documents which are clear and understandable to those with no knowledge of planning.

All comments are read and considered, and changes are made to the documents produced as a result. It is clear from the responses that some issues were insufficiently explained. In this case, how much ‘room for manoeuvre’ that there is in this Supplementary Planning Guidance. The policies themselves were set in the Local Development Plan and cannot now be changed. Although this was set out on the Consultation Hub, a fair number of comments still suggested changes to matters contained in the policies themselves.

To check if the consultation is reaching all parts of the population, equalities monitoring information was requested from respondents via the hub. The results are shown in the table below: population comparison figures are from East Lothian by Numbers (ELC), unless noted otherwise.

Respondents (% answering question)	Percentage of those who answered/(East Lothian or Scottish population in brackets)	Comparison of characteristics of respondees compared to the East Lothian population
Female/Male (81%)	57.5% (54%) 48% (42%)	There were slightly fewer male respondents than in the population as a whole however this is within the range expected by chance.
Respondents who identified as transgender (65%)	None (0.6-1%) ¹	This is in probably in line with East Lothian demographics.
Age (81% answered) Under 18/18-35/35-55/55-75/75+	Under 18: 4% (21%) 18 – 35: 12% (18%) 35-55: 46% (31%) 55-75: 35%(23%) 75+: 4% (8%)	Fewer people both at the very young at very old age spectrum responded than are in the population. This is expected: the youngest age group includes babies and young children, while the oldest may include more people who are also unable to respond due to incapacity. More people in the 35-75 age groups responded than are in the general population. It might be worth giving more thought to the age divisions to try and allow for this in monitoring. In general planning consultations tend to attract responses from older age groups, so it is a positive that the number of responses from people under 35 were received, even if this is slightly lower than would be expected. The Policy and Strategy team will continue to think about how to encourage people in younger age groups to engage with planning policy.

¹ The Gender Identity and Research Education Society published a Home Office report estimating that between 0.6% and 1.0% of the population were trans quoted in Scottish Governments Equality Evidence Finder at <https://scotland.shinyapps.io/sg-equality-evidence-finder/>

Disability (78% answered)	Do not consider they have a disability: 92% (81% ²) Consider they have a disability 8% (19%)	A lower percentage of respondents said they had a disability in comparison to those in the census. The Policy and Strategy team will continue to think about how to make sure issues related to disability do not prevent participation in planning consultations.
Ethnicity ³ (78% answered)	White – Scottish or British: 92% (95%) White – other – 8% (4%) Any other ethnicity – 0%	Although there are no non-white respondents, this is not necessarily out of line with the East Lothian population, due to low numbers of people who state there are of an ethnicity other than white in East Lothian. However, the Policy and Strategy team note this and will continue to bear in mind the need to reach people with ethnicities other than white.
Sexual orientation (60% answered)	Heterosexual/straight – 100% (95% ⁴) Any other – 0% (5%)	Although the percentage of respondents to this consultation stating they were of non-heterosexual sexual orientation is not entirely what would be expected if the responses were random, the low total numbers of respondents mean this may not be out of line with population. Population information on sexual orientation does not appear to be available below Scotland wide level, so it is not certain whether the population in East Lothian is the same as in Scotland as a whole. In addition, people may have felt less comfortable answering this question in the context of equalities monitoring of this consultation than in the Scottish Surveys Core Questions. This is shown by a lower percentage of people providing this information than other equalities monitoring questions.
Religion (78% answered)	Christian - 40% - (51%) Other religion – 4% (1.2%) No religion – 56% (41%)	The respondents to this consultation reporting they are from different religions is likely to be in line with the East Lothian population. The population comparison figures were derived from the Scottish Census in 2011; data from the Scottish Surveys Core Questions (2017) suggests that in Scotland as a whole there has been an increase in adults reporting not belonging to a religion, to 49% in 2016, with a corresponding decrease in those reporting belonging to the Church of Scotland, down from 32% to 26%.

² Compared to Scotlands Census 2011 Table DC3101SC for ‘activities limited a little’ and ‘activities limited a lot’

³ East Lothian Ethnicity information is from census table KS201SC at www.scotlandscensus.gov.uk

⁴ The population comparison here is Scotland wide, based on Scottish Surveys Core Questions April 2019, quoted in Scottish Governments Equality Finder

Marital status (75% answered ⁵)	Married/Civil partnership – 58% (50%) Single – 25% (30%) Widowed – 4% (7%) Other – 12% (11%)	The respondents to this consultation are broadly in line with the population in terms of marital status.
<p>Summary: It is encouraging that responses were received from those in the under 35 years age group, as the perception is that it is people in older age groups who tend to respond to consultations such as this. No responses to this consultation were received from people who stated they were other than white, heterosexual or non-transgender, and few from people who stated they had a disability. While on any of these indicators individually this is not out of line with the East Lothian population, taken as a whole it is perhaps less so. The Planning and Strategy team are keen to hear from all segments of the population, and will continue to think about how to reach everybody.</p>		

⁵ Scotland's Census table KS103SC is the population comparison

Responses to the Consultation Questions

Question 1: Policies DC3, DC4 and DC5 have been approved through the Local Development Plan process and cannot now be changed through this consultation. Do you have any comments on the Guidance related to these policies?

Q1 Respondent	Summary of Response	Officer Comment	Proposed change to document
Historic Environment Scotland	<p>Welcomes guidance on the countryside polices references to the historic environment and content that key points are identified. Regarding Policy DC5 Housing as Enabling Development welcomes the detail in terms of the breadth of heritage assets that may be considered under the policy and suggests an additional reference to policies for scheduled monuments and battlefields and some additional clarification to references to Gardens and Designed Landscapes, Inventory battlefields, Historic Environment Scotland guidance on Designation Policy and Selection and to the term natural landscape in paragraph 1.11</p>	<p>Support welcomed. The Council accepts the additional references to paragraph 1.7 and has amended the wording of bullet point four in paragraph 1.8. However it is not accepted that bullet point 5 needs any amendment in relation to battlefields as it is only a structure or landscape that could be the subject to enabling development in respect of a battlefield. The amendment proposed to paragraph 1.9 is accepted and reference made to the Designation Policy and Selection Guidance. Paragraph 1.11 is amended.</p>	<p>Add to paragraph 1.7 sentence 5 after Designed Landscapes; 'CH4: Scheduled Monuments and Archaeological sites and CH5: Battlefields'.</p> <p>Redraft paragraph 1.8 bullet point 5 to read; 'A building, structure or landscape that is identified as being of outstanding value within an individual entry in the national Inventory of Gardens and Designed Landscapes'</p> <p>Reword paragraph 1.9 to read Occasionally, a building may merit designation as one of the above, but has not been through the necessary assessment to determine a significant heritage value. A request can be made to Historic Environment Scotland</p>

Q1 Respondent	Summary of Response	Officer Comment	Proposed change to document
			<p>for a building to be considered as a listed building or a site to be scheduled or included on the Inventory of Gardens and Designed Landscapes. Where this approach is taken for a building or site proposed to be considered as being of heritage value under the terms of policy DC5, the resultant report from HES will be considered by East Lothian Council in an assessment as to whether it is of recognised heritage value, sufficient to meet the terms of this policy. There are separate planning policies that need to be considered for all cultural heritage designations contained within the Cultural Heritage section of the LDP.</p> <p>Add new sentence at end of paragraph 1.10; An assessment should also consider Historic Environment Scotland Designation Policy and Managing Change Guidance.</p> <p>Delete 'natural' from last box in table at paragraph 1.11</p>

Q1 Respondent	Summary of Response	Officer Comment	Proposed change to document
<p>Scottish Environment Protection Agency</p>	<p>On the understanding that many of the development proposals to which this SPG applies will be relatively small scale SEPA suggest incorporating its pre-application advice for small scale development.</p>	<p>Comment noted. The council agrees that it would be useful for the SPG to include this advice.</p>	<p>The following change is made to the SPG:</p> <p>Insert new paragraph 1.14 and renumber following paragraphs accordingly, to read;</p> <p>‘Wherever a house or small group of houses is proposed in the countryside consideration must be given to the suitability of ground conditions for private sewage disposal in areas where connection to the public sewer is not available. Small scale development should be avoided where it will be at flood risk or may increase flood risk elsewhere, e.g. by diverting a flow path towards homes, business premises, transport infrastructure. Care should be taken when considering housing (especially) in proximity to SEPA regulated sites such as landfill sites, anaerobic digestion facilities, large scale poultry farms.’</p>

Q1 Respondent	Summary of Response	Officer Comment	Proposed change to document
Member(s) of Public	The transport links for the dwellings and areas in the countryside are not sufficient	Local Development Plan policies permit development in the countryside in only specific circumstances with most development directed towards existing settlements; part of the reason for this is because it is unsustainable to encourage development where there is little or no public transport.	No change required.
Member(s) of Public	Where and when were these policies publicised and who gave them the approval? What companies do these people have an interest in?	LDP policies were publicised when the Proposed East Lothian Local Development Plan was reported to and approved by East Lothian Council on 6 September 2016 and the subsequent period for representations to the plan was open from 19 September 2016 to 6 November 2016 and publicised by adverts in the East Lothian Courier on the 15 and 22 September 2016. There were no declarations of interest declared at the meeting of East Lothian Council on 6 September 2016. A register of Councillors' Interests is available on the Council web page.	No change required.
Member(s) of Public	<p>Replacement buildings allowed by policy DC3 should not be visibly obtrusive and should blend in with existing buildings of the countryside as conversions do, including the use of stone, and design of the access road. By design they should be rural buildings and not stand out by their height, materials or modern design with gardens, landscaping and garaging carefully planned.</p> <p>Views from the road and public paths such as the John Muir Way on the approaches to and</p>	The wording in policy DC3 in the LDP requires that any replacement dwelling allowed for under policy DC3 must be similar in size, scale and massing to the original and would be of an appropriate character for its location. Much of the land east of North Berwick is designated in the LDP as policy DC9 Special Landscape Area or policy DC8 Countryside Around Towns designed to protect the landscape from development that would harm the objectives for which it is designated.	No change required.

Q1 Respondent	Summary of Response	Officer Comment	Proposed change to document
	<p>around North Berwick must be protected as a tourist resource and nature habitat. The location of the proposed retirement village east of North Berwick is where visitors, cyclists and walkers, stop to enjoy and photograph the views. Castleton Farm is particularly photogenic according to recent comments tweeted on social media and developers are using this as justification for new development.</p>		
Member(s) of Public	<p>Policy DC4 - Brownfield sites should be developed before agriculture land. Too many hamlets cannot sustain local services and could be enlarged which may prevent urban sprawl elsewhere e.g. at Musselburgh and Tranent.</p>	<p>Policy DC4 allows only single houses or very small scale new build affordable houses in the countryside. While brownfield sites may be preferable it may be that there is no suitable brownfield site available at a location where there is an identifiable need. Policy DC4 does not specify that a brownfield site is required. The comment that too many hamlets cannot sustain local services and could be enlarged thus preventing urban sprawl elsewhere is noted. However, that would be a matter for the next Local Development Plan rather than for supplementary planning guidance as the spatial strategy and plan policies in the LDP 2018 are fixed and cannot be changed at this stage.</p>	No change required.

Q1 Respondent	Summary of Response	Officer Comment	Proposed change to document
Member (s) of the Public	<p>Policy DC5 - A detailed definition of Enabling Development is required. The LDP is not specific enough. Enabling Development must consider the setting of Listed Buildings and reflect their characteristics and purpose. Enabling Development can also subsidise the generation of leisure employment and tourism on a site. Housing is acceptable Enabling Development but must be of a scale to sustain local amenities and infrastructure.</p>	<p>The council considers that an adequate explanation of enabling housing development is provided in the LDP in the preamble to Policy DC4. The supplementary planning guidance provides additional guidance on the situations outlined in the policy where enabling development might be supported which the council considers is sufficient. However, a change to paragraph 1.13 should be made to make it clearer that enabling development can apply to other forms of development as stated in Policy DC5. It is not accepted that housing accepted as enabling development needs to be of a scale that sustains local amenities and infrastructure as this could require large scale development of a type inappropriate to a countryside location.</p>	<p>Amend paragraph 1.13 to read;</p> <p>‘Assessment of all applications that seek enabling development for any use specified in Policy DC5 will be subject to the council obtaining independent advice on the overall development finances to ensure that any enabling development is the minimum necessary to achieve the primary use and it is not a substitute for normal development funding, including borrowing.’</p>
APT Planning & Development	<p>DC3 - Some of the wording is unnecessarily restrictive. In instances where a building exists (or previously existed) what is the harm in permission being granted for a replacement building (potentially larger) if it is well designed, more environmentally responsive and overall would improve the character and setting of that particular site.</p>	<p>Policy DC3 allows replacement dwellings in only very specific and reasonable circumstances. To be less restrictive would in all likelihood result in the loss of many of the small scale rural buildings in the countryside such as farm cottages and their replacement with larger new houses. A policy that simply stated that this would be acceptable if it improved a particular site would not guard sufficiently against the loss of overall character in the countryside and could in time, result in the suburbanisation of the countryside. In line with Scottish Planning Policy the LDP directs new housing development towards existing settlements and in the countryside seeks to encourage the conversion of appropriate vernacular buildings to other uses when they become redundant.</p>	<p>No change required.</p>

Q1 Respondent	Summary of Response	Officer Comment	Proposed change to document
	<p>The policies are worded to try and exclude replacement development, 'punishing' situations where a building has been left to fall into a state of disrepair, but again if the replacement can make a positive contribution, then let's allow new, attractive and innovative development and enable positive examples throughout the county. While the elements that make East Lothian special must be protected, we should also be seen as progressive and welcoming good design creating new landmarks, worthy of preservation in their own right.</p> <p>DC4 - in a similar vein, it must be possible that opportunities exist for new homes in the countryside at appropriate locations which can encourage country living, innovative and attractive design which will not have wider detrimental impacts whilst making a positive contribution to the immediate</p>	<p>The LDP presumes against the development of new houses in the countryside except in specific circumstances and policy DC4 cannot be changed through supplementary planning guidance. Policy DC4 does allow for new build affordable houses in the countryside, recognising that the cost of rural housing can be unaffordable to many who need to live or work in the countryside, but not for market houses in the countryside. While opportunities for market housing in the countryside may exist, the Council, in line with Scottish Planning Policy, considers that these are better directed towards existing settlements where more sustainable travel options exist.</p>	

Q1 Respondent	Summary of Response	Officer Comment	Proposed change to document
	environs (in that they are attractive buildings in their own right). Applying DC3 and DC4 in a more positive enabling manner may result in mistakes, but they will be isolated and small-scale and will inevitably lead to better policies, better decision making and better outcomes in the future.		
Member(s) of Public	New houses should not use up valuable farm land in the Lothians as that means that farm land is never again available for food production.	Comment noted.	No change required
North Berwick Community Council	The North Berwick Community Council welcomes the clarification of guidance round the Local Development Plan.	Comment noted.	No change required.
Member(s) of Public	These are rigorous policies and it is important that they are maintained in the coming years	Comment noted.	No change required.
Member(s) of Public	All developments should be monitored for the good of the environment. Spoiling arable countryside and destroying wild life is the wrong way to go.	Comment noted. The policies of the Diverse Countryside and Coastal Areas part of the LDP aim to allow only relatively small scale and appropriate development within the countryside. Other LDP policies protect designated areas of natural heritage.	No change required.
Member(s) of Public	Enough of the countryside has already been destroyed for new housing for which there is insufficient infrastructure e.g.	It is acknowledged that the LDP allocates a significant amount of large scale development in many towns and villages within East Lothian much of which has to be on greenfield land due to the general lack of brownfield development opportunities. Where	No change required.

Q1 Respondent	Summary of Response	Officer Comment	Proposed change to document
	medical services, schools, post offices, banks and good quality roads.	development has been allocated associated improvements to infrastructure such as transport, schools and medical facilities are sought.	
Member(s) of Public	North Berwick should not be ruined any further	Comment noted.	No change required.
Member(s) of Public	Enough development already.	Comment noted.	No change required.
Member(s) of Public	Building should not take place on prime arable land that is needed for food production and it should not be at the expense of wildlife.	Comment noted.	No change required.

Question 2: Do you have any comments on how the Council proposes to determine whether a proposal requires a coastal location?

Q2 Respondent	Summary of issue raised	Officer Comment	Proposed change to document
SNH	Reference to Natura 2000 sites should be altered to 'European sites'	It is recognised that the Conservation (Natural Habitats &c) Regulations 1994 refer to such sites as European Sites rather than Natura (or Natura 2000 sites). However, 'European sites' is not felt to be a very well-known usage, as there could be other types of site which are European – it could also imply sites in Europe rather than here to the layperson. SNH uses 'Natura' to describe such sites on its website and this name is preferred.	Amended to 'Natura' rather than Natura 2000.

Q2 Respondent	Summary of issue raised	Officer Comment	Proposed change to document
SNH	Welcomes recognition of the National Marine Plan but notes it is 'aligned with', rather than 'derived from', Scottish Planning policy	Agree that the National Marine Plan and Scottish Planning Policy are aligned, rather than in a hierarchy.	Amended para 1.15 to note National Marine Plan is 'aligned with' Scottish Planning Policy
SNH	it is unclear on what is meant by the first row of Table 1 on page 6 and recommend that this type of example of need is used carefully, particularly as it could imply that a proposal related to the management of a Natura 2000 site would require to be sited specifically within Unspoiled Coast.	The intention was that development related to the conservation management of in particular the Firth of Forth SPA might be acceptable. The word 'conservation' will be added before 'management to make it clear that it is the conservation management of the site and not some other type of management that is intended. The intention of this table is to show what type of development might be acceptable in the Unspoiled Coast. The following section on the Constrained Coast clearly states that types of development acceptable in the Unspoiled Coast are likely to be acceptable there also. As development in the Developed Coast does not have to show a requirement for a coastal location such development is clearly potentially acceptable there also. Para 1.19 encourages proposals that require a coastal location to locate within the Developed Coast. Text has been added to try and clarify that it is not the case that such proposals <i>must</i> be located on the Unspoiled Coast.	paragraph 1.24 'may' has been added to the last sentence so it reads 'Examples of the type of proposal that <i>may</i> have a need for a particular coastal location on the unspoiled coast are shown below;
SEPA	Paragraph 1.15 includes the phrase "mitigation and adaptation to climate change". It is positive that this need has been identified, but it would be more positive if the consequences of meeting these needs were identified and followed through, especially for those coastal areas and	Predictions of the impact of climate change on the coast through sea level rise and coastal erosion in the long term, in particular under the 'business as usual' emissions scenario are significant. However, adaptation measures such as requiring development to avoid a coastal location altogether is a matter for LDP2. Mitigation of climate change is a separate issue not related to the siting or design of development on the coast specifically.	No change.

Q2 Respondent	Summary of issue raised	Officer Comment	Proposed change to document
	communities, and communities built around rivers.		
Montagu Evans on behalf of SSE Renewables Ltd (SSER)	SSER are currently working on Seagreen 2 and 3 proposed offshore windfarms. SSER has an operational requirement to locate cable connections and substations close to the coast in order to connect into offshore windfarms. NPF3 identifies this as nationally important infrastructure. While connections are likely to be underground, with minimal long-term effects, substations may be more sensitive. SSER request that the essential nature of this equipment and its role in achieving renewable energy targets should be given appropriate recognition through the SPG.	NPF3 currently identifies the High Voltage Energy Transmission network as a national development. The SPG acknowledges that there are proposals in the National Planning Framework which require a coastal location. The SPG explicitly notes that energy from offshore windfarms has to come ashore somewhere, and that this is potentially a reason a coastal location may be required. However, although the cable has to cross the coast, there may be other possible locations for substations and other infrastructure. The SPG as written would allow such infrastructure on the coast provided it did require such a location, as set out in Table 2. The Council does recognise that offshore wind is important in meeting renewable energy targets, and that connection infrastructure is vital (albeit there may be different options for delivering this). The SPG will be re-worded to acknowledge this.	End last sentence in first box at "water", add new sentences "Offshore windfarms have an important role in meeting renewable energy targets and infrastructure to allow connection to the National Grid is an essential part of that. Cables connecting offshore windfarms to the National Grid clearly must cross the coast somewhere, and other electricity infrastructure may also require a coastal location (for example if this is the least environmentally sensitive option)".
Montagu Evans on behalf of SSE Renewables Ltd (SSER)	SSERs current proposals do not involve any works on the developed or unspoiled coast. The SPG states that development in the Constrained Coast will only be allowed where it requires a coastal location. Table 2 of the SPG	Support noted.	No change requested

Q2 Respondent	Summary of issue raised	Officer Comment	Proposed change to document
	notes that proposals that require cable connections to offshore windfarms are a reason why a coastal location may be required, along with infrastructure requirements. SSER supports this.		
Montagu Evans on behalf of SSE Renewables Ltd (SSER)	The SPG should make specific reference to the Council's support for the connection to offshore windfarms within East Lothian, including grid cabling, associated substations and ancillary equipment.	LDP Policy EGT4: Enhanced High Voltage Energy Transmission Network sets out policy on energy transmission network, noting the circumstances in which the Council would support enhancement. The SPG cannot alter the policy of the LDP.	No change; would require change to LDP.
North Berwick Community Council	There are many areas where it is [not] clear what criteria will be used or the weight given to different factors. We hope the Council will work closely with North Berwick Community Council and our partners on proposals.	The comment does not state which parts are not clear, or what needs further explanation. The Community Council is a statutory consultee on planning applications.	No change.
Scottish Water	Table 2 (paragraph 1.27 of the draft) mentions water works, however Scottish Water may need access for their waste water treatment works also.	The Council accepts waste water works could require a coastal location.	'Waste water works' has been added to the list under 'Infrastructure' in Table 2
Blackdykes Farm	There is a danger that the constrained and developed coast comes under renewed pressure from additional	LDP Policy DC6 protects areas of coast by restricting the types of development allowed there. Housing is unlikely to be acceptable on the constrained coast, however would be possible in the developed coast. A change to this position would require change to the LDP.	No change; would require change to LDP.

Q2 Respondent	Summary of issue raised	Officer Comment	Proposed change to document
	housing where developers seek the greatest increase in land value because of the natural attractiveness of the area. This precious coastline needs to be protected.		
Member(s) of the public	The typology of the developed, constrained and unspoiled coast is supported.	Noted. This typology derives from Scottish Planning Policy and was set in the Local Development Plan not this guidance.	No change requested.
Member(s) of the public	Protection of open views of the coast, coastal islands and sea stretching to the horizon should be included	The desirability of a development having a sea view is listed in paragraph 1.26 as not something the Council would normally take into account. Protection of existing views is considered later in the document; the first test is whether a proposal requires a coastal location. If that test is met, its acceptability under other criteria, including coastal views, will be considered.	No change
Member(s) of the public	The tests should be clear and objective; there is too much room in the tests for subjective interpretation	The SPG gives guidance on how the Council will determine whether a proposal requires a coastal location. What the Council will take into account is set out, with examples of how different types of proposal could be justified. This provides more clarity than the policy alone and should result in more transparent and objective decision making. However, it is not possible to foresee all types of development that could potentially come forward. A checklist approach is likely to either exclude proposals that do require a coastal location, or omit some that don't.	No change.
Member(s) of the public	Who is going to decide what <i>needs</i> to be next to the coast.	The planning authority will determine planning applications and so will decide if the applicant has sufficiently justified the need for a coastal location. Paragraphs 1.22 and 1.26 have been altered to clarify that although it is for the applicant to justify need, it is the planning authority that determines whether the justification is acceptable.	Add 'to the planning authority' to the first sentence of paragraph 1.26 so it reads: "It is for the applicant to justify to the planning authority clearly why a coastal location is required." The first sentence

Q2 Respondent	Summary of issue raised	Officer Comment	Proposed change to document
			of paragraph 1.22 has been altered to read “‘Need’ will be considered on a case-by-case basis and is for the applicant to demonstrate to the planning authority.”
Member(s) of the public	It is unclear what constitutes an ‘established need’ for any particular development.	‘Established need’ must be shown for development in the Unspoiled Coast (the Forth Islands). How this is established is set out in paragraph 1.22, with a number of examples shown in the following table to give a flavour of what types of proposals might meet this test. It is not possible to foresee all types of development that could be possible, however it is clear that there must normally be a public benefit, and that need should be established by reference to the National Planning Framework, legislation or similar.	No change
Member(s) of the public	Any development if possible should be kept away from the coastline as much as possible.	The location of the coastal area and the requirements for development there were set in LDP Policy DC6 and cannot be changed through this guidance. LDP policy restricts development in the unspoiled and constrained coast to that which requires a coastal location. In already developed areas (such as within towns and villages), it is not necessary for developers to show that a coastal location is required however development should respect the qualities of the coast. The change requested is an LDP matter.	No change; would require change to LDP.
Member(s) of the public	Many developments require a coastal location but should not be allowed.	LDP Policy DP6 provides that proposals that require a coastal location may be acceptable. The SPG cannot go beyond LDP Policy.	No change; would require change to LDP
Member(s) of the public	There are several brownfield sites along the coast that could be re-development including the former Cockenzie Power Station site, and cliff top WW2	Clearly, brownfield land cannot be re-developed other than where it is. Looking at the Vacant and Derelict Land (VDL) survey 2018, there is some derelict but no vacant land in the coastal area. There may be small sites not included in the survey. There is no derelict land in the Unspoiled Coast. The Constrained Coast contains Gin Head Radar Station, North Berwick as mentioned and East Barns, Dunbar.	No change

Q2 Respondent	Summary of issue raised	Officer Comment	Proposed change to document
	installation NW of Tantallon Castle [Gin Head]	<p>Within the Constrained Coast, the VDL survey sites contain buildings, which are covered by LDP Policy DC2.</p> <p>The Council does not consider that there are significant areas of brownfield land within the Constrained or Unspoiled Coast that would benefit from redevelopment. There are however some limited areas in the Constrained Coast that are in use now, but which could become brownfield.</p> <p>One of the objectives of the LDP is to make efficient use of land, buildings and infrastructure, prioritising the development of previously developed land over greenfield. Another is to avoid inappropriate development in locations where this is important to protect the character, setting and identity of the local area. The desirability of re-using brownfield sites does not generally outweigh the desirability of protecting areas of unspoiled or constrained coast, so this is not included in the examples of proposals that might require a coastal location. It is possible that there may be exceptions to this though, which would be for the developer to justify to the planning authority.</p> <p>The Developed Coast contains the power station site mentioned and Balcarres Road Gasworks. Here, proposals can come forward which do not require a coastal location. Neither LDP Policy DP6 nor this SPG preclude re-development of brownfield sites on the developed coast. Such proposals would have to respect the qualities of the coast. This requirement is intended to lead to the enhancement of the character of the developed coast and is not expected to prevent brownfield sites from coming forward.</p>	
Member(s) of the public	The requirement for a coastal location should include only infrastructure or maritime	Policy DC6 allows proposals that require a coastal location, and this is not limited to infrastructure or maritime requirements. Both of these uses may be allowed as set out in the SPG. Uses other than those suggested are listed in the SPG, such as extensions to existing	No change; would require change to LDP

Q2 Respondent	Summary of issue raised	Officer Comment	Proposed change to document
	requirements that requires a coastal location	houses. These are not maritime, or infrastructure. It is considered that the uses listed do require a coastal location, in line with the policy, for the reasons given in the guidance.	
Member(s) of the public	If the same outcome can be achieved by building inland it does not require a coastal location.	The aim of LDP Policy DP6 is to avoid development on the unspoiled and constrained coast that does not require a coastal location. The SPG is in line with the comment for the Unspoiled and Constrained coast. For the Developed Coast, uses other than those with a requirement for a coastal location are acceptable under LDP Policy DP6. The General Design and Siting Principles include as (1) that development requiring a coastal location should first consider locating in the Developed Coast in line with LDP paragraph 5.13 that the developed coast should be promoted as the focus for new development requiring a coastal location.	No change; would require change to LDP.
Member(s) of the public	The requirement should not include a financial gain for builders, developers or landowners.	The SPG notes that in deciding whether or not a coastal location is required the Council will take into account a clear link between the land and sea, and not normally take into account the desire to make an economic return on land the applicant owns.	No change.
Member(s) of the public	Development should not be to the detriment of food production on agricultural land.	Prime agricultural land is covered by LDP policy NH7 and MIN8. The desirability of retaining land for food production is a separate issue from addressing whether or not a proposal requires a coastal location. Agricultural land and food production are not included in Policy DC6.	No change; would require change to the LDP
Member(s) of the public	Development should not be at the expense of wildlife.	Biodiversity is protected by the natural heritage policies of the LDP, in particular Policies NH1 – 5 of the LDP. Presence of native coastal habitat and species is noted as a positive quality of the coast in this guidance. Impact on biodiversity is a separate issue from whether or not a proposal requires a coastal location, and are not included in Policy DC6.	No change; covered elsewhere in the LDP
Member(s) of the public	Temporary, removable uses such as camping pods should be the only other uses allowed.	Policy DC6 states that a coastal location must be required, without exception for temporary uses. Uses such as camping pods would be considered under 'tourism' and whether the use itself required a	No change; would require change to the LDP

Q2 Respondent	Summary of issue raised	Officer Comment	Proposed change to document
		coastal location. It would be contrary to LDP Policy DC6 to allow a use that did not require a coastal location, even if it was temporary, and therefore cannot be included in this guidance.	
Member(s) of the public	Fishing boats and jobs and the industries they support require a coastal location.	Fishing boats require a coastal location and this is included in the guidance (as facilities related to sea-going boats). Industry related to fishing such as packing or processing may or may not need a coastal location; it would be for the developer of such a facility to demonstrate to the planning authority that a coastal location is required.	No change.
Member(s) of the public	No house, housing development or care home needs a coastal location.	It is agreed that there is no need for housing (including care homes) on the Unspoiled Coast. Generally, houses, housing developments or care homes do not need a location in the constrained coast. However, conversion of existing buildings into a house is covered by LDP Policy DC2, and is considered acceptable in the constrained coast where there are appropriate buildings. Text has been added to paragraph 1.23 as shown to clarify that housing will not be acceptable on the Unspoiled Coast, including conversion of buildings. LDP Policy DC6 allows development in the Developed Coast that does not require a coastal location providing the character of the coast is respected. Housing development cannot be excluded in the Developed Coast through this guidance as that goes further than LDP policy.	Add at the end of the first bullet point of para 1.22 "(this excludes for example all housing development at this could take place elsewhere)" to clarify that housing will not be acceptable on the Unspoiled Coast. The following text has been added to the end of paragraph 1.26 of the draft guidance: "New housing (including care home facilities) is unlikely to be considered to require a coastal location."
Member(s) of the public	General support for protecting the coast, in particular the unspoiled coast.	The guidance supports protection of the coast, in particular the unspoiled coast, as set out in the LDP. Noted.	No change requested.

Question 3: For the coast, the guidance sets out qualities and design guidelines for the coast as a whole and for the diverse areas along it. Have we satisfactorily identified the overall qualities of the coast and are the related siting and design guidelines appropriate? If not what would you change?

Q3	Summary of issue raised	Officer Comment	Proposed change to document
SEPA	Development should be avoided where it will be at flood risk or may increase flood risk elsewhere.	This issue is covered by other LDP Policy NH11 and Advice Box 8, and others. The 'Design and Siting' Guidelines for the coast as a whole (Table 3) include: (4) Support the operation of natural coastal processes other than where set out in the Shoreline Management Plan, East Lothian's plan for managing coastal erosion, and (6) Avoid locations which do or will require new defences against coastal erosion or flooding where possible. Adding further policy on flood risk here would go beyond what is in the LDP.	No change; would require change to the LDP
Montagu Evans on behalf of SSER	The SPG Design and Siting principles should recognise there will be a requirement to connect offshore windfarms and that further guidance should be given on criteria to be used in assessing and justifying proposals as being suitable locations for connection cables, grid cabling and associated substations within these areas.	LDP Policy EGT4 sets out policy on High Voltage Transmission works. It is recognised that finding the best site for such infrastructure is likely to be challenging. Finding the right site requires a good understanding of technical options and limitations, which makes it difficult to give useful criteria for this specific proposal. The Design and Siting principles, along with those set out in the Area tables, do aim give a strategic level guidance on what should be taken into account in designing and siting proposals, and consequently how the Council will assess such proposals. It is not clear exactly what changes to the SPG are sought, however the Council would welcome early engagement on this matter.	No change
Montagu Evans on behalf of SSER	As national developments and large scale infrastructure project, the progression of offshore wind farm proposals and the associated grid connections (including substations) will need to be considered in the context of	The Design and Siting principles aim to identify the positive qualities of the coast, and related siting and design aims. It is not clear how a reference to detailed studies would fit with this, though they clearly will be necessary for some large scale projects.	No change

Q3	Summary of issue raised	Officer Comment	Proposed change to document
	<p>environmental and other consenting procedures. The Design and Siting principles should make reference to the fact that detailed studies (including scoping) will provide an opportunity for East Lothian Council and other consultees to shape the required level of detail in each case.</p>		
<p>Blackdykes Farm</p>	<p>The wording 'there will be a general presumption against development in those {Forth Island] locations' is too loose as development should always be avoided.</p>	<p>This wording is contained within the LDP, which is now adopted. LDP policy is restrictive towards development in these locations, but LDP Policy DC6 allows it in some very limited circumstances. Preventing all such development would not be compatible with LDP Policy DC6.</p>	<p>No change; this would require change to the LDP.</p>
<p>Member(s) of the public</p>	<p>"Nope. Nope. Nope."</p>	<p>The respondent does not say what is wrong or how it can be improved.</p>	<p>No change.</p>
<p>Member(s) of the public</p>	<p>We should also look to protect public access to and views of the coast, and avoid private development spoiling the view.</p>	<p>The guidance identifies maintaining pedestrian access to the sea and along the coast as a Design and Siting Principle (22) under the positive quality of 'Coastal Recreation'. Scenic views of the sea, islands and coast is identified as a positive quality. Retention of views of the sea, islands or foreshore from public areas is included as a Design and Siting principle (9). The SPG does not consider existing places with vehicular access where people can park to obtain views of the coast. This is an important feature of some coastal areas, and design and siting of new development should take this into account to allow people with less mobility to continue to enjoy the coast. Benches are also important for enjoying views in some locations. These have been added to the Area tables.</p>	<p>Sea viewing, including from vehicles and benches has been noted as an activity in the following locations in the Area tables: Fisherrow Harbour, Port Seton and Cockenzie Harbour areas, Longniddry Bents car parks, Aberlady and Kilspindie car parks, Gullane Bents car park, Marine Parade and East Beach, North Berwick car parks, Seacliff upper car park, Lamer Street, Dunbar, and Barns Ness car park.</p>

Q3	Summary of issue raised	Officer Comment	Proposed change to document
Member(s) of the public	Views of the coast should be protected as a tourist resource and nature habitat	Scenic views of the sea, islands and coast is identified as a positive quality. Retention of views of the sea, islands or foreshore from public areas is included as a Design and Siting principle (9). Presence of native coastal habitat and species is noted as a positive quality of the coast. Habitat is protected under the natural heritage policies of the LDP in particular NH1 – NH5.	No change.
Member(s) of the public	Views of the coast with the sea stretching to the horizon	Views of the coast are included, however views of the sea horizon are not mentioned. This is considered an important aspect of coastal views. and has been added to the positive quality 'Scenic views of the sea, islands and coast' and the related Design and Siting Principles.	Add 'sea horizon' to the positive quality 'Scenic Views of the sea, islands and coast' and the related Design and Siting principles in Table 3.
Member(s) of the public	Coastal roads should not be changed and roundabouts, traffic lights etc put in as this changes the character and unspoiled nature of these.	Some coastal roads do have a particular character which could be harmed by traffic management measures or alterations, however, this may be needed for road safety reasons. It is recognised this should be carefully considered.	Add "Alterations to roads including traffic management items should be carefully considered to avoid harm to the character of coastal areas" as a design and siting principle to the Positive Quality 'Scenic Views of the sea, islands and coast' in Table 3.
Member(s) of the public	Our county is known for its lovely coastal landscapes and historic sites	Historic sites are protected under the cultural heritage policies of the LDP, and 'Historic links between land and sea' is noted as a positive quality, with preserving and enhancing historic coastal features , and views of historic assets included in the Design and Siting Principles (8) in Table 3. Landscape is not specifically mentioned, however. Although the Special Landscape Area SPG is cross referenced frequently, coastal landscapes are important and could usefully be specifically mentioned in this SPG.	Add 'Coastal landscape' to positive quality 'Scenic views of the sea, islands and coast' in Table 3.
Member(s) of the public	Being in nature and close to the sights and sounds of the sea have well-known beneficial effects on well- being.	Both naturalness and pedestrian access to the coast are mentioned as positive qualities in Table 3. The SPG does not mention sounds (or smell) of the sea, which is a distinct aspect of coastal character perhaps especially for blind people. 'Sound and smell of the sea' has	Add 'Sound and smell of the sea' as a positive quality in Table 3, with an associated design principle (16) Allow for

Q3	Summary of issue raised	Officer Comment	Proposed change to document
		been added as a positive quality of the sea, with an associated design principle 'Avoid adverse impact on the appreciation of the sound of the sea from public areas"	appreciation of the sound and smell of the sea from public areas
Member(s) of the public	Ecosystems are part of coastal character.	The SPG notes 'Presence of native coastal habitat and species' as a positive quality.	No change
Member(s) of the public	Coastal area should be broadened	Defining the extent of the coastal area is a matter for the LDP not SPG.	No change; would require change to the LDP
Member(s) of the public	The coastal area should not be built upon.	Preventing all such development would not be compatible with the adopted policy in the LDP.	No change; would require change to the LDP
Member(s) of the public	There should be no large scale developments next to the protected coast that affect the greater landscape value of the area.	Some large scale developments may require a coastal location, and in line with LDP Policy DC6 may be acceptable provided they respect the qualities of the coast. Preventing all such development would not be compatible with the adopted policy in the LDP. The landscape value of the area is also considered in the Special Landscape Area SPG to which extensive reference is made in this SPG. However, coastal landscape is a positive quality of the coast, and to make this clearer changes have been made to Table 3.	Add 'Coastal landscape' to the positive quality 'Scenic views of the sea, islands and coast' in Table 3. Otherwise no change as this would require change to the LDP.
Member(s) of the public	Any essential building should be in keeping with the environment, not affect views, destroy prime agricultural land or impact the unique character of the area	The SPG aims to show how development can be in keeping with the environment and protect the unique character of the area. It identifies coastal and sea views as a positive quality in Table 3. Policy on protection of prime agricultural land is a separate issue covered by Policy NH7 of the LDP and is not a matter for this SPG.	No change
Member(s) of the public	Light pollution that would change character should be avoided	he quality 'Coastal landscape and scenic views of the sea, sea horizon, islands and coast' includes Design and Siting Principle (12) that lighting should not be introduced or increased within the foreshore/intertidal area. Light pollution is also considered for some specific places in the Area sections. Lighting is sometimes needed for safety or other reasons however. It is agreed that light pollution can potentially significantly change the night time character of places, and that it is this change, rather than the introduction of lighting as such, which should be avoided.	Design and Siting Principle 12 of Table 3 has been altered to read "Lighting that would adversely change the character of the area should be avoided, and in particular should not be increased within the foreshore/intertidal area"

Q3	Summary of issue raised	Officer Comment	Proposed change to document
		The wording of the relevant Design and Siting Principle has been altered.	
Member(s) of the public	Development should be centred towards major arterial roads and wherever possible not push traffic through towns	The location of development in general terms such as this is a matter for the LDP.	No change; this would require change to the LDP.
Member(s) of the public	Do not build where there is areas of interest or biodiversity.	The natural and cultural heritage policies of the LDP cover areas of interest and biodiversity, and aim to protect them. Presence of native coastal habitat and species is identified as a positive quality in Table 3, with related Design and Siting Principles. Cross references to sites designated for various interests including biodiversity have been included. A complete bar on development in such areas would not be in line with a the LDP, although it does aim to protect them,	No change; this would require change to the LDP.
Member(s) of the public	What about the pollution being brought to the coast	Naturalness, including clean and healthy sea free of marine litter is identified as a positive quality in Table 3. Pollution is generally addressed through separate legislation.	No change
Member(s) of the public	Leave the coastal areas as they are.	LDP Policy DC6 sets out the parameters for development in the coastal areas. Preventing all development would not be compatible with the adopted policy of the LDP. The SPG aims to describe coastal character and give design and siting principles so character can be protected and enhanced.	No change

Question 4 – Policy DC8 - Countryside Around Towns. Do you have any comments on the guidance on Countryside Around Towns?

Q4 Respondent	Summary of Response	Officer Comment and Proposed Change	Proposed change to document
North Berwick Community Council	North Berwick Community Council welcomes that the guidance strengthens and supports Policy DC8 Countryside Around Towns. In a community where there are strong pressures for development, the policy and guidance offer protection to the beautiful countryside and landscape settings around our town and North Berwick’s essential character and identity. We know other communities value their places too. North Berwick Community Council believes the community supports and values our green spaces and countryside around towns and recognises the importance of ensuring that development does not damage or undermine the qualities that make North Berwick a wonderful place to live.	Support for policy DC8 noted.	No change required.
Member(s) of Public	How would any new houses be sustained when transport links are insufficient?	Policy DC8 does not permit new housing development.	No change required.
Member(s) of Public	There is pressure to build on green belts and green corridors. These should be respected as there would be loss of local identity if places such as Musselburgh and Edinburgh or North Berwick and Dirleton join. Green belts and corridors are more important than ever given the health impact of open space and trees, and should not be developed.	This comment supports the guidance in respect of policy DC8.	No change required.
Member(s) of Public	Agree that protecting countryside around towns needs protection	Support noted.	No change required.

Q4 Respondent	Summary of Response	Officer Comment and Proposed Change	Proposed change to document
Member(s) of Public	Stop building on green space around Haddington. East Lothian is beautiful because of its green space. Haddington cannot cope with the additional population from new housing and locals are pushed out by expensive house prices.	Policy DC8 applies to much of the countryside around Haddington and therefore applies in support of the comment. All planned new development that has been allocated at Haddington in the LDP has been assessed for its impact on infrastructure such as education, transport and medical services and proportionate developer contributions made accordingly to ensure that Haddington can cope with the additional population that will arise from new housing development on allocated sites.	No change required.
Member(s) of Public	East Lothian is known for its small villages and towns which must not merge into each other or become a suburb of Edinburgh. Coastal development should be avoided.	Comment supported. Prevention of coalescence and the maintenance of the character and identity of East Lothian's towns and villages are reasons for the designation of many of the areas under policy DC8.	No change required.
Member(s) of Public	Developers should be forced to work harder to maintain the character and identity of towns and villages as there are too many bland or repetitive developments appearing. There are good examples of new build housing more in keeping with their surroundings on main roads at Biggar and Peebles.	Comment noted. Design of new development is a matter for the proposed separate supplementary planning guidance on Design Standards for New Housing Areas rather than this supplementary planning guidance on Countryside and Coast.	No change required.
Member(s) of the Public	We need more jobs in the countryside to reduce commuting to other parts of the Lothians. Leisure Employment and Tourism uses should be allowed in the countryside. Housing should be allowed as enabling development if it helps achieve this aim.	LDP policy DC1 allows for the establishment of business uses in the countryside that have an operational requirement for a countryside use including tourism and leisure uses. However business use that does not require a countryside location is directed towards allocated employment areas within towns and villages.	No change required.

Q4 Respondent	Summary of Response	Officer Comment and Proposed Change	Proposed change to document
Member(s) of Public	DC8 Countryside Around Towns is fully supported. It is important to protect the areas ELC have identified though previous consultations and this should be rigorously imposed. The supplementary guidance clarifies this policy.	Support for the guidance relating to policy DC8 noted.	No change required.
Member(s) of Public	Re the statement in the policy where specifically new areas of housing, employment or other large scale developments are not permitted within the Countryside Around Towns designation - towns like North Berwick will experience constant pressure from developers over the next few years and strengthening this will make this clearer where you can build and where you have protected it.	Support for the guidance relating to policy DC8 noted.	No change required.
Member(s) of Public	Fully support the LDP and agree with DC8 and believe this guidance clarifies the relevant policy in particular where it states that new areas of housing, employment or other large scale developments are not permitted within the CAT designation. Could this be made greenbelt for future protection? Developers need a strong LDP to make it clear that there are 'boundaries' over which they cannot cross.	Support for the guidance relating to policy DC8 noted. The purpose of the guidance is to supplement the LDP policy but cannot change it, therefore policy DC8 areas cannot be changed in this LDP to green belt.	No change required.
Member(s) of Public	Supports the guidance for policy DC8. It is important that developers do not develop in areas of attractive landscape where development would be more lucrative. The focus should instead be on good quality well considered development in the correct areas.	Support for the guidance relating to policy DC8 noted. Design of new development is a matter for the proposed separate supplementary planning guidance on Design Standards for New Housing Areas rather than this supplementary planning guidance on Countryside and Coast.	No change required.

Q4 Respondent	Summary of Response	Officer Comment and Proposed Change	Proposed change to document
Member(s) of Public	<p>Development should be not be permitted on Special Landscape Areas or Countryside Around Town areas. Any building around these areas for infrastructure whether Countryside Around Town or other, should not be large scale developments that change the character settings, landscape, ecosystems - nor increase light pollution. These areas should be a last resort, not an option because a land agent and landowner see an opportunity that suits their requirements.</p> <p>The proposed amendments to the LDP enhance, clarify and strengthen the policy DC8 and are welcomed. We would like to see CAT strengthened further such that these areas could be designated statutory green belt to keep the coastal character intact for future generations.</p>	<p>Support for the guidance relating to policy DC8 noted. The guidance recognises that in the event that a proposal for an essential infrastructure development may be proposed on an area covered by policy DC8 and it can be shown to require that location it should be permitted. It is acknowledged that such infrastructure could potentially be large scale and in such a situation every effort should be made to ensure that it does not harm any objective for which policy DC8 is applied.</p> <p>Support for the guidance relating to policy DC8 noted. The purpose of the guidance is to supplement the LDP policy but cannot change it, therefore policy DC8 areas cannot be changed in this LDP to green belt.</p>	No change required.
Member(s) of Public	I am a resident in Gullane and all four criteria in this policy has definitely not been considered. I doubt if it will be implemented in any other 'Countryside Around Towns' area either.	The LDP was required to allocate a substantial amount of land for new housing development to conform with the SESplan the strategic development plan for south east Scotland. Its allocations included land for housing development at Gullane. The LDP sought to balance this with new policies to protect the most sensitive locations in East Lothian through the application of policies for the green network, special landscape areas, green belt and policy DC8 Countryside Around Towns. It is acknowledged that sensitive landscape around Gullane that has been designated as countryside around towns under policy DC8 has necessarily excluded sites allocated for	No change required.

Q4 Respondent	Summary of Response	Officer Comment and Proposed Change	Proposed change to document
		development. However, it is considered that the designated housing sites were appropriate in landscape terms but that further large scale development on sensitive sites at Gullane would be harmful to the landscape setting of the village, hence the application of policy DC8 to parts of its landscape setting.	
Member(s) of Public	East Lothian Council is systematically decimating the countryside. New developments should only be on brownfield sites.	Comment noted. It is suspected that the comment relates to the allocation of sites that were formerly agricultural land on the edges of towns and villages East Lothian has a dearth of brownfield sites and there was insufficient brownfield land to accommodate the required amount of new housing in line with the LDP strategy. This supplementary planning guidance is for sites within the countryside away from towns and villages and seeks to allow development in only specific circumstances which is considered to be a proportionate and appropriate response to planning within the countryside with the intention of maintaining the overall character of the countryside.	No change required.
Member(s) of Public	As a local GP I would encourage planners to consider the impact future developments may have on local health services.	While the impact of large scale new housing developments on health services is taken into account in the preparation of a Local Development Plan this guidance does not require it to be taken into account in the limited circumstances of housing approval in the countryside outside towns and villages.	No change required.
Member(s) of Public	DC8 is a good and necessary policy that needs to be properly enforced. Developers will try and get	Support for the guidance relating to policy DC8 noted.	No change required.

Q4 Respondent	Summary of Response	Officer Comment and Proposed Change	Proposed change to document
	round it as they will make the most money from these policies. It is essential for future generations that the council protects the surrounding countryside of towns.		
Member(s) of Public	Countryside around towns benefits the people who want to get out and about in the fresh air. Roads are appalling and infrastructure is falling apart, so change it.	Comment noted. Areas designated under policy DC8 as countryside around towns offer opportunity for green network development which helps get people out and about and is beneficial for health.	No change required.
Member(s) of Public	The proposed amendments to the LDP enhance, clarify and strengthen policy DC8 and are welcomed. We would like to see CAT strengthened further such that these areas could be designated statutory green belt to keep the coastal character intact for future generations.	Support for the guidance on policy DC8 noted. The purpose of the guidance is to supplement the LDP policy but cannot change it, therefore policy DC8 areas cannot be changed to green belt in this LDP.	No change required.
Member(s) of Public	Guidance on DC8 supported. All housing and developments harm the countryside, particularly large scale housing development. Many new houses are too expensive and unaffordable for local people.	Support for the guidance on policy DC8 noted. Whilst it is accepted that large scale development could harm the countryside it is considered that some development in the countryside would be acceptable and is permitted under the terms of the LDP Countryside and Diverse Coast policies. Comment regarding the cost of new houses is noted, however, LDP policy HOU3 requires that the proportion of affordable housing to be provided will be 25% of the total number of dwellings proposed for sites totalling five or more houses.	No change required.
Member(s) of Public	Supports Supplementary Planning Guidance. Developers will in the future try their hand to propose developments outside of the collar of our town North Berwick. These revised	Support for the guidance on policy DC8 noted.	No change required.

Q4 Respondent	Summary of Response	Officer Comment and Proposed Change	Proposed change to document
	Guidelines will wisely prevent speculative and unwelcome developments outside its terms.		
Member(s) of Public	Supports Supplementary Planning Guidance especially Policy DC8 which will protect the countryside and thinks the correct areas are identified and for the right reasons.	Support for the guidance on policy DC8 noted.	No change required.
Member(s) of Public	Suggestion to re-wild Countryside Around Towns land between Belhaven and West Barns.	This comment relates to how land that is designated as countryside around towns is used. While the suggestion to re-wild the land would be acceptable in terms of policy DC8 it is not a matter that the Council has any control over given that the area covered by the Countryside Around Towns designation is privately owned.	No change required.
Member(s) of Public	There is a real danger that North Berwick will be joined with Dirlerton by strip housing along the A198 such that it could be designated under policy DC8 Countryside Around Towns under the criteria 'to prevent the coalescence of settlements'.	Comment noted. No new areas of designated land can be made through this supplementary planning guidance.	No change required.
Clarendon Planning and Development on behalf of The Esperance Trust	The Countryside Around Towns policy is not specific and simply blanket covers undeveloped areas around settlements. Considers that not all undeveloped areas around settlements contribute to their setting and character. SPG should identify specific areas for protection and have a list of the special qualities that justify the protection or it should be based on other guidance with a revisited methodology. Whereas SPP calls for the creation of high quality places by taking a holistic approach ELC appears to be	The locations where policy DC8 is applied do not cover all land around a settlement anywhere in East Lothian. The policy is applied only to those areas that are considered to be sensitive in terms of the landscape setting of the settlement or which have potential to avoid coalescence or potential for green network development, or a combination of the above. It is accepted that not all undeveloped areas around settlements contribute positively to their setting and character but those areas around settlements that do are designated under policy DC8. The council considers that this	

Q4 Respondent	Summary of Response	Officer Comment and Proposed Change	Proposed change to document
	<p>advocating a policy that simply limits development around settlements.</p> <p>The CAT area around Haddington surrounds the town almost entirely precluding development. The policy justification does not list the qualities of the smallholdings landscape important to the landscape character. Considers that further sensitive development could take place in this area without losing the overall landscape character. Suggest that assessment of any proposals in CAT areas should allow for the retention of key qualities of specific areas</p>	<p>SPG does satisfactorily identify specific areas for protection and explains why these are justified. In place-making SPP advocates taking a holistic approach that responds to and enhances the place while balancing the costs and benefits of potential opportunities over the longer term. The council considers that the LDP has done that by allocating a significant number of appropriate sites for development. At the same time it has provided mitigation by the development of green networks and the protection of sensitive landscapes including those around some towns and villages. This is in line with para 76 SPP which acknowledges that in pressurised areas easily accessible from Scotland's cities it is important to protect against the suburbanisation of the countryside particularly where there are environmental assets such as sensitive landscapes.</p> <p>The council considers that Haddington has a particularly sensitive landscape setting given its low-lying nature that justifies the allocation of land under policy DC8 as a sensitive landscape. For sensitive development to work within an area of smallholdings it would have to ensure that it reflected the pattern of smallholdings and did not cover a smallholding area in houses and diluting its character. Policy DC8 and this supplementary guidance allows for particular and appropriate forms of development that would not harm the</p>	<p>Amend Appendix 2 Haddington Countryside Around Towns Area paragraph 3 to read;</p> <p><i>To the west of the town the countryside of Letham Mains has a distinctive landscape character of long established smallholdings, most of which comprise an original house, workshop and small</i></p>

Q4 Respondent	Summary of Response	Officer Comment and Proposed Change	Proposed change to document
	<p>without having a blanket opposition to development.</p>	<p>landscape setting of the settlement or contribute to coalescence with another settlement. The guidance goes further and explains what type of development would not be acceptable, this includes large scale housing or employment development. The council considers this to be a reasonable approach for sensitive landscapes.</p> <p>The council accepts that the explanation of the qualities of smallholdings area included within the DC8 designation at Haddington could be further clarified.</p>	<p><i>agricultural field. These are regularly spaced along a local road network within the wider countryside. The smallholdings have a very small proportion of developed area at the house and workshop adjacent to the roads and a larger area that is open fields. The whole smallholding is set within a rural landscape setting comprising open fields and woodland strips. It is this well spaced out 'string of pearls' pattern that provides its essential character based on its historic development. The area is significant as one of the largest areas of smallholdings in East Lothian. Infill development of any open fields to the rear of smallholdings would result in the loss of this distinctive landscape settlement pattern and be visually detrimental to the entrance to Haddington at its western entrance along the A6093.</i></p>

Q4 Respondent	Summary of Response	Officer Comment and Proposed Change	Proposed change to document
Clarendon Planning and Development on behalf of The Esperance Trust	<p>The Countryside Around Towns policy is not specific and simply blanket covers undeveloped areas around settlements. Considers that not all undeveloped areas around settlements contribute to their setting and character. SPG should identify specific areas for protection and have a list of the special qualities that justify the protection or it should be based on other guidance with a revisited methodology. Whereas SPP calls for the creation of high quality places by taking a holistic approach ELC appears to be advocating a policy that simply limits development around settlements.</p>	<p>The locations where policy DC8 is applied do not cover all land around a settlement anywhere in East Lothian. The policy is applied only to those areas that are considered to be sensitive in terms of the landscape setting of the settlement or which have potential to avoid coalescence or potential for green network development, or a combination of the above. It is accepted that not all undeveloped areas around settlements contribute positively to their setting and character but those areas around settlements that do are designated under policy DC8. The council considers that this SPG does satisfactorily identify specific areas for protection and explains why these are justified. In place-making SPP advocates taking a holistic approach that responds to and enhances the place while balancing the costs and benefits of potential opportunities over the longer term. The council considers that the LDP has done that by allocating a significant number of appropriate sites for development. At the same time it has provided mitigation by the development of green networks and the protection of sensitive landscapes including those around some towns and villages. This is in line with para 76 SPP which acknowledges that in pressurised areas easily accessible from Scotland's cities it is important to protect against the suburbanisation of the countryside particularly where there are environmental assets such as sensitive landscapes.</p>	No change required.

Q4 Respondent	Summary of Response	Officer Comment and Proposed Change	Proposed change to document
	<p>The CAT area around Ormiston fails to adequately justify the inclusion of the Glebe field to the east of the historic core, which would not lose its character by having the view to the open countryside reduced. Suggests that assessment of any proposals in CAT areas should allow for the retention of key qualities of specific areas without having a blanket opposition to development. Sensitive development here could be designed to maintain the sense of place</p>	<p>Given its historical planned development, the council considers that Ormiston has a sensitive landscape setting on the approaches to the historic core of the village on its east side that justifies the allocation of land at the Glebe field under policy DC8 as a sensitive landscape. The council considers that the presence of open fields visible from the historic core adds to its historic character which would be diminished if large scale housing or other development were visible.</p>	
<p>Clarendon Planning and Development on behalf of Overhailes Farm, East Linton</p>	<p>The Countryside Around Towns policy is not specific and simply blanket covers undeveloped areas around settlements. Considers that not all undeveloped areas around settlements contribute to their setting and character. SPG should identify specific areas for protection and have a list of the special qualities that justify the protection or it should be based on other guidance with a revisited methodology. Whereas SPP calls for the creation of high quality places by taking a holistic approach ELC appears to be advocating a policy that simply limits development around settlements.</p>	<p>The locations where policy DC8 is applied do not cover all land around a settlement anywhere in East Lothian. The policy is applied only to those areas that are considered to be sensitive in terms of the landscape setting of the settlement or which have potential to avoid coalescence or potential for green network development, or a combination of the above. It is accepted that not all undeveloped areas around settlements contribute positively to their setting and character but those areas around settlements that do are designated under policy DC8. The council considers that this SPG does satisfactorily identify specific areas for protection and explains why these are justified. In place-making SPP advocates taking a holistic approach that responds to and enhances the place while balancing the costs and benefits of potential opportunities over the longer term. The council considers that the LDP has done that by allocating</p>	<p>No change required.</p>

Q4 Respondent	Summary of Response	Officer Comment and Proposed Change	Proposed change to document
	<p>Suggests that site PROP DR8 which has planning permission provides evidence that it is possible to carefully and sensitively design development in many Countryside Around Towns sites. Suggests that assessment of any proposals in CAT areas should allow for the retention of key qualities of specific areas without having a blanket opposition to development. Sensitive development here could be designed to maintain the sense of place.</p>	<p>a significant number of appropriate sites for development. At the same time, it has provided mitigation by the development of green networks and the protection of sensitive landscapes including those around some towns and villages. This is in line with para 76 SPP, which acknowledges that in pressurised areas easily accessible from Scotland's cities it is important to protect against the suburbanisation of the countryside particularly where there are environmental assets such as sensitive landscapes.</p> <p>The council notes that while site PROP DR8, Pencraig Hill at East Linton, which has not yet been developed, is a site on the edge of East Linton it is not a site in the DC8 designated area.</p>	
Holder Planning on behalf of Stewart Milne Homes	<p>Considers that paragraph 1.40 of the draft supplementary guidance should be amended where it states that "New areas of housing, employment or other large scale development are not permitted with the Countryside Around Towns". In our view, this statement goes beyond what policy DC8 states and should be amended accordingly. We therefore propose that the</p>	<p>The council disagrees that this statement goes beyond what policy DV8 states. Policy DC8 states that the only new development that will be supported in a DC8 area is development that is required as part of green network implementation; for community use; for rural business, tourism or leisure use or is essential infrastructure. This does not allow for new areas of housing and is further reinforced by the preamble to the policy that</p>	No change required.

Q4 Respondent	Summary of Response	Officer Comment and Proposed Change	Proposed change to document
	<p>following words are added to the above sentence: “...if it would harm the objectives of designation.”</p> <p>Paragraph 1.42 of the draft supplementary guidance goes on to say that Policy DC8 is intended to allow only development appropriate to the countryside as specified in LDP policies DC1, DC2 and DC3 i.e. very small scale development and not groups of houses. Again, we consider this to be a misrepresentation of Policy DC8, which states that “Any new development must not harm the landscape setting of the countryside location and must be of a scale, size and form that would not harm the objectives for the countryside around towns”.</p> <p>It therefore does not necessarily follow that Policy DC8 is intended to allow just “very small scale development”. This departure from what is stated by Policy DC8 is compounded on page 37 of the draft supplementary guidance, where it states that the CAT Objectives are addressed by protection of the landscape setting of settlements and “Development of these sites would harm the landscape setting of East Linton”.</p> <p>In our view, this is an unreasonable and unjustified conclusion, and goes beyond the intent of Policy DC8. We therefore recommend that the sentence is amended as follows:</p>	<p>states that these areas should be retained as ‘open and undeveloped’. The guidance is only further explaining the policy.</p> <p>In respect of paragraph 1.42, the council considers that it adequately explains the wording of policy DC8. The sentence at the end of the policy that states ‘Any new development must not harm the landscape setting of the countryside location and must be of a scale, size and form that would not harm the objectives for the countryside around towns designation’, simply refers to the four situations above where development would be accepted in the countryside around towns. These are the only situations where development is permitted and by their nature are likely to be small scale, but in any event the caveat sentence below is there to ensure appropriate impact.</p> <p>In reference to page 37, the reference to Development in the first bullet point under the heading CAT objectives addressed was referring to large scale development rather than the limited forms of development allowed by the policy. Whilst to be absolutely clear this could be caveated accordingly, the council considers that this section of the SPG is dealing with the impact of larger scale development.</p>	

Q4 Respondent	Summary of Response	Officer Comment and Proposed Change	Proposed change to document
	"Development of these sites should not harm the landscape setting of East Linton".		

Question 5: We have identified 13 different Areas but there could have been fewer, larger, areas or the Areas could have been broken down further into smaller ones. Do you think the boundaries of the Areas are right? If not, what would you change?

Q5 Respondent	Comment	Response	Proposed change to document
Member(s) of the public	Support from about half of respondents for the Area boundaries.	Noted.	None requested.
Member(s) of the public	The boundaries of North Berwick do not look like the map.	It is not clear what the comment refers to or what changes are required.	No change.
Member(s) of Public	Surprised to see so few 'Unspoiled' areas. Including more land as Unspoiled would give the possibility of having more protections available to the Council. The Barns Ness Coast and Bass Rock is a Site of Special Scientific Interest and there are areas classed as geological sites. A fourth group, 'Protected' would cover areas with specific protections.	The areas of Unspoiled, Constrained and Developed coast were set out in the LDP and cannot be changed through this SPG. The typology of 'Unspoiled', 'Constrained' and 'Developed' Coast follows that set out in Scottish Planning Policy. The areas noted which are protected are already covered by separate LDP policy on the interest for which they are designated.	No change; this would require change to the LDP.
Member(s) of Public	North Berwick catchment area is too small.	The comment does not say if they consider the area should be extended to the east, west, or inland, or give a reason why it is too small. Inland, the boundary is set by the LDP. The coast within and immediately opposite the town of North Berwick is considered to have a different character to the cliffs to the east, which are more rugged and	No change

Q5 Respondent	Comment	Response	Proposed change to document
		less accessible. The character changes more gradually to the west, with sandy beaches becoming more rural and dune backed as you travel round the coast. Broad Sands beach, which is walkable from North Berwick, could have been included in this Area. However, the western boundary of the Area was chosen as there is a small burn there, while the beach at Broad Sands was felt to share its character more with that of Yellowcraig/Gullane than of the more built environment backed beaches of North Berwick.	

Question 6: Appendix 3 sets out a description of each area, and proposed siting and design guidelines specific to each area (in addition to the overall siting and design guidelines in the main body of the guidance). Is there anything you would change in the descriptions of the Areas or the related siting and design guidelines specific to each Area?

Q6 Respondent	Summary of issue raised	Officer Comment	Proposed change to document
SNH	The caption for Figure 1 (page 5) states that the coastal areas are numbered from East to West; however, they are numbered and presented from west to east.	As pointed out, the areas are indeed numbered west to east.	Amend caption for Figure 1, page 5, to read 'West to East'
SNH	There are references throughout to the Shoreline Management Plan. It would be useful to provide a hyperlink, and/or a glossary of terms.	It is agreed a glossary would be useful. The Shoreline Management Plan is not currently available online, but the team will look into this.	Glossary of terms added.
Montagu Evans on behalf of SSER	SSER has a particular interest in the Barns Ness Coast (Area 12) and Thorntonloch Coast (Area 13). No mention is given to offshore windfarms and	The purpose of the SPG is to clarify the requirements for development in the coastal area, to set out the qualities of the coastal area and provide design and siting advice. It is recognised	Add text to the last paragraph of Area 13 description: "A cable connection to Neart na Gaoithe offshore windfarm crossing this

Q6 Respondent	Summary of issue raised	Officer Comment	Proposed change to document
	<p>the requirement to connect into this infrastructure.</p>	<p>that offshore windfarms are planned, and will need to connect to the National Grid. LDP Policy EGT3: Forth Coast of Area of Coordinated Action states that the Council supports the principle of electricity grid connections on the Forth coast from Cockenzie to Torness, provided infrastructure is combined where possible, connection to existing infrastructure at Cockenzie and Torness is prioritised, and proposals do not have an adverse effect on the Firth of Forth SPA. The Council also supports (LDP Policy EGT4 the enhancement of the high voltage electricity transmission network in locations defined by operational requirements, subject to acceptable impacts including on the landscape and natural heritage. The Thorntonloch Area is south of Torness, though there is a consented offshore windfarm connection cable consented in this Area. LDP Policy EGT3 gives locational guidance and this SPG cannot depart from that.</p>	<p>area at Thorntonloch beach has been consented, which will be underground. The offshore windfarms of the Forth may also be visible from this area on a clear day, though extensive views of the sea horizon will remain”.</p>
<p>Member(s) of Public</p>	<p>Area 7 North Berwick and Area 9, St Baldred’s Coast. The road and John Muir Way approaches to and around North Berwick, and North Berwick Law should be protected as a tourist resource and nature habitat.</p>	<p>The areas to be covered by different designations which would protect tourist resource and natural habitat were set in the Local Development Plan and cannot be changed through this SPG. Biodiversity is protected through the natural heritage policies of the plan, in particular NH1-5. Presence of native coastal habitat and species is noted as a positive quality of the coast in this SPG. The approach to North Berwick from the east is to the North of the A198 to the eastern edge of Tantallon Caravan Site was included in the coastal area, but not to the</p>	<p>“including the John Muir Way” has been added to Design and Siting Principle 23 in Table 3.</p>

Q6 Respondent	Summary of issue raised	Officer Comment	Proposed change to document
		south and west of this. The route of the John Muir Way is sometimes on the coast, sometimes not; here it runs along or through the edge of the coastal zone from Quality Street to Westerdunes Park, then eastwards towards Yellowcraig. The A198 road into North Berwick from the west is not in the coastal zone. 'Coastal Recreation' is included in the SPG as a positive quality. Both 'maintaining pedestrian access along the coast' and 'avoid adverse impact on recreational uses of the coast' are included in the SPG, which was intended to include the John Muir Way. However, the John Muir Way is an important tourist route and this could be reinforced in the SPG.	
Member(s) of Public	The Drift café detracts from the visual amenity of the area.	Noted. Past planning decisions cannot be altered through this SPG.	No change
Member(s) of Public	Parking remains an issue in North Berwick at the weekends	This is not a matter for this SPG.	No change
Member(s) of Public	Greater areas around the protected sites should be considered: where areas merge into CAT and SLA areas this should all be managed together.	The areas covered by different policy designations are set out in the LDP and cannot be changed through this SPG.	No change; this would require alteration through the LDP
Member(s) of Public	'Constrained' is not a good description, perhaps 'oversubscribed, destroyed, overdeveloped'.	The names of the different types of coast follows Scottish Planning Policy and are set out in LDP Policy DC6.	No change; this would require alteration through the LDP
Member(s) of Public	The ruins of St Mary's Priory SM760 should be added to Area 7, North Berwick 'Built Heritage and Cultural Associations'	This monument is not in the coastal area.	No change

Question 7 – Do you have any other comments on the Supplementary Planning Guidance?

Q7 Respondent	Summary of issue raised	Officer Comment	Proposed change to document
SEPA	A layer of necessary information, which seems to be missing from this SPG, is an updated strategic flood risk assessment which takes account of updated predictions for climate change. This really is necessary in order to inform a sustainable pattern of development on the coast and in the countryside of East Lothian.	A strategic flood risk assessment was prepared as part of the LDP process. This document is supplementary planning guidance and does not allocate any land for development therefore a strategic flood risk assessment is not required for the purposes of this SPG. It will however be updated in the course of preparation for the next Local Development Plan.	No change required.
SNH	The maps used throughout the document need a unified colour scheme, e.g. colour used for Countryside Around Towns (CAT) should be consistent across all maps. At the moment, the CAT areas are shown shaded in green, in blue and also as an outline with no fill. This makes it difficult to read across, reducing the overall accessibility and usability of the document. We also consider that mapping of routes, e.g. Rights of Way, should be checked for legibility. At the moment they are difficult to differentiate from background and also from each other.	This comment is noted. As all maps have keys to explain the colours used it is not considered that such a change is necessary. It is only in the rare situation where paths have a dual function that there is more than one colour scheme used and it is considered it is as clear as it can be.	No change required.