

Blindwells Environmental Report

May 2010



Prepared for:

Revision Schedule

Blindwells Development Framework SEA - Environmental Report May 2010

Rev	Date	Details	Prepared by	Reviewed by	Approved by
01	01/2009	Draft Structure	Nicolas Whitelaw Environmental Planner	Lewis Hurley Senior Environmental Consultant	
02	12/2009	Draft Report	Sean Fallon Planner	Gayle Adams Principle Planner	Gayle Adams Principal Planner
03	05/2010	Post consultation Report	Gayle Adams Principal Planner		Nigel Hackett Director

This document has been prepared in accordance with the scope of Scott Wilson's appointment with its client and is subject to the terms of that appointment. It is addressed to and for the sole and confidential use and reliance of Scott Wilson's client. Scott Wilson accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided. No person other than the client may copy (in whole or in part) use or rely on the contents of this document, without the prior written permission of the Company Secretary of Scott Wilson Ltd. Any advice, opinions, or recommendations within this document should be read and relied upon only in the context of the document as a whole. The contents of this document do not provide legal or tax advice or opinion.

© Scott Wilson Ltd 2008

Scott Wilson
23 Chester Street
Edinburgh
EH3 7EN

Tel +44(0)131 225 1230
Fax +44(0)131 225 5582

www.scottwilson.com

Table of Contents

1	Non Technical Summary.....	4
1.1	Introduction.....	4
1.2	The Blindwells Development Framework.....	5
1.3	Scoping Information.....	6
1.4	Assessment Results.....	11
1.5	Monitoring.....	12
2	Introduction.....	14
2.1	Introduction.....	14
2.2	The SEA Process.....	14
2.3	The Blindwells Development Framework.....	16
3	SEA Requirements Checklist.....	20
3.1	Introduction.....	20
4	Context.....	21
4.1	Introduction.....	21
4.2	Assessment of Plans, Programmes and Strategies.....	21
4.3	Key messages from context review.....	23
5	Baseline Information.....	24
5.1	Introduction.....	24
5.2	Relevant Aspects of the Current State of the Environment.....	25
5.3	Data ‘gaps’ and availability.....	28
6	SEA Framework and Objectives.....	29
6.1	Introduction.....	29
6.2	SEA Framework.....	29
7	Methodology.....	31
7.1	Introduction.....	31
7.2	Approach to the Assessment of the Blindwells Development Framework.....	31
8	Assessment of the Vision.....	34
8.1	Introduction.....	34
8.2	Testing the Blindwells Development Framework Vision.....	34
8.3	Assessment Results.....	35

9	Blindwells Development Framework Options – Alternatives Considered	36
9.1	Introduction	36
9.2	Options	36
9.3	Assessment of the Options	40
10	Assessment of Draft Development Framework	41
10.1	Introduction	41
10.2	Likely future of the area without the PPS	41
10.3	Development Framework	41
10.4	Assessment Results	42
10.5	Recommendations	43
10.6	Monitoring	43
11	Further Information	45
11.1	Blindwells Development Framework	45
11.2	SEA	45
12	Consultation Update	46
12.1	Consultation details	46
12.2	Comments on the Strategic Environmental Assessment Environmental Report and responses	46
12.3	Summary	51
	APPENDIX 1: Vision Assessment	52
	APPENDIX 2: Assessment of Blindwells Development Framework Options	56
	APPENDIX 3: Assessment of Blindwells Development Framework	62
	Appendix 4: Summary of Policy Context Review	71
	Appendix 5: Consultation comments	88

SEA ENVIRONMENTAL REPORT – COVER NOTE

PART 1

To:

SEA.gateway@scotland.gsi.gov.uk

or

SEA Gateway
Scottish Executive
Area 1 H (Bridge)
Victoria Quay
Edinburgh
EH6 6QQ

PART 2

An Environmental Report is attached for:

The Blindwells New Settlement Development Framework

The Responsible Authority is:

East Lothian Council

PART 3

Contact name

Andrew Stewart

Job Title

Principal Planner

Contact address

East Lothian Council
Environment Department
John Muir House
Court Street
Haddington EH41 3HA

Contact tel no

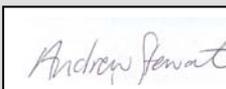
01620 827257

Contact email

astewart3@eastlothian.gov.uk

PART 4

Signature



Date

21 December 2009

1 Non Technical Summary

1.1 Introduction

- 1.1.1 This is the non-technical summary, explaining how the Strategic Environmental Assessment (SEA) process has been applied to the Blindwells New Settlement Development Framework, and what the outcomes are in terms of significant environmental effects.
- 1.1.2 SEA is a requirement of Directive 2001/42 of the European Commission on the effects of certain plans and programmes on the environment. In Scotland the SEA of land use planning documents is required under the Environmental Assessment Act (Scotland) 2005. The Act sets out the processes that must be undertaken as part of an SEA and the content that an assessment must include.
- 1.1.3 The overarching aim of SEA is to ensure that negative environmental effects are kept to a minimum, and positive environmental effects are promoted at every opportunity. As a guide to practitioners, the Scottish Executive published the SEA Tool Kit in September 2006. This document provides detailed information on undertaking SEA within the Scottish context.
- 1.1.4 In order to implement the Environmental Assessment Act guidance in the form of the Scottish Governments SEA toolkit was published. The SEA Toolkit sets out the stages of SEA and is illustrated in Figure 1.1. The process incorporates a number of distinct stages, designed to create a robust assessment of potential significant environmental effects.
- 1.1.5 Screening of the Blindwells Development Framework was undertaken in October 2008 with a subsequent Scoping Report produced in December and consulted upon until early January. The Scoping Report was then updated and has been used as the basis for this assessment.
- 1.1.6 This Environmental Report details the assessment of the Development Framework. It firstly looked at three development options for the basis of the guidance, with a second stage of detailed assessment of the proposals within the document. The assessment proposed measures for mitigation and enhancement where required.

1.2 The Blindwells Development Framework

The Blindwells Site

- 1.2.1 The site is located in the western part of East Lothian close to the existing communities of Prestonpans, Port Seton, Cockenzie, Longniddry and Tranent as shown in Figure 2.1. The site is bounded by the East Coast Mainline Railway to the north, the A1 trunk road to the south, the A198 to the west, and agricultural land to the east.
- 1.2.2 The Blindwells site was previously used as an open cast coal mine during the 1980's and 90's. It has since been largely been restored to agricultural purposes. The land to the east of the site is also currently used for agricultural purposes.

The Blindwells Development Framework

- 1.2.3 The Development Framework for Blindwells New Settlement in East Lothian has been prepared by East Lothian Council. It sets out the land uses expected from the local plan allocation and how the Council requires the site to be developed. Details of the content of the Development Framework that we have assessed are given in **Section 10** of this report.
- 1.2.4 The first phase of work towards producing a Development Framework was the production of 3 indicative development options. Development options for the site were considered in broad terms. With several fixed elements and specific site requirements, the variety within the options is limited. All of the options have possibilities, however it is considered that Option 1 and 3 may both offer the most positive alternatives. At this stage, without the full extent of technical studies, it is not possible to firm up an agreed option and given they offer the same land uses and final solution this will be agreed at a later stage. Many of the issues identified can be turned into opportunities through appropriate design solutions. At this stage the options are not detailed and this allows for flexibility as the constraints and issues with the site are understood in more depth, therefore, this document can only respond to those matters known at this time. The Development Framework and masterplan will address matters in more detail having regard to up to date information, and use this document to assist in the process. Full details of the options that we have assessed are given in **Section 9** of this report. Please note there may be flexibility in final option as technical studies move further along.
- 1.2.5 Once adopted by East Lothian Council the Blindwells Development Framework will be a material consideration for the Council when determining any planning application for the allocated land, and for the applicant(s) / developer(s) of the site when preparing a single Masterplan for the entire allocated site. The Masterplan must

describe and illustrate how the development requirements, design principles and submission requirements of this Development Framework have been met.

1.3 Scoping Information

- 1.3.1 The SEA Scoping Report reviewed a number of influential documents to identify the key messages for inclusion within the scope of the assessment. These are summarised in Table 1.1 below.

Table 1.1: Context review key messages

Key Messages
The Development Framework must avoid undue adverse affects on sites of biodiversity interest and must avoid any adverse affects on European level designated sites
Seek to enhance biodiversity where this is possible
The Development Framework should not lead to the pollution of watercourses, and groundwater and consider any flood risk within the site.
Opportunities to promote sustainable water use should be taken in new development
Seek to promote new and accessible open spaces and leisure facilities
Promote the use and access to sustainable transport and avoid unsustainable increases in traffic
Ensure access to all features and facilities for disabled groups
Reduce waste production, increase waste recovery, reuse and recycling
Seek to implement all options to include low carbon technology
Look to incorporate advice on sustainable design and construction features to reduce energy use, reduce the risks of flooding, encourage biodiversity and reduce waste.
To protect and, where appropriate, enhance the historic environment and cultural heritage
Seek to provide a mix of housing tenures and affordability and support these with a range of retail, employment and leisure opportunities in order to reduce transport demands
Seek all opportunities to engage with the local population on decisions and options for future development on the Blindwells site.

- 1.3.2 The collection of baseline information is a key component of the SEA process and a legal requirement under the SEA Directive. Baseline information helps to provide a basis for predicting environmental effects and assembling baseline data helps to identify sustainability problems. The potential early stage options for the Development Framework will be assessed generally against this evidence to highlight any issues to be addressed, constraints and opportunities.
- 1.3.3 Table 1.2 below summarises the baseline data under the topic chapter headings of the Scoping Report presented for consultation.

Table 1.2: Environmental Baseline Information

Topic Chapter	Key Information
Ground Resources	<p>Geological mapping shows the area surrounding the Blindwells site is formed from Carboniferous Rock. The Blindwells site was previously excavated as an opencast coal mine, and has since been backfilled with rock and drift material. The surrounding area consists of Grade 1 and 2 quality prime agricultural land. There is currently almost no waste generation from the site</p> <p>The previous use of the Blindwells site as an opencast mine may mean that whilst there will be minimal impacts on geology and soils from further development there is potential for ground instability issues, even with the previous restoration of the site.</p> <p>East Lothian has made progress towards increasing the percentage of waste sent for composting and recycling. However the total waste arisings has continued to increase.</p>
Biodiversity, Flora and Fauna	<p>There are no specific biodiversity designations or features of interest on the Blindwells site. The Blindwells site consists of improved and semi – improved grassland.</p> <p>The Firth of Forth SPA, Ramsar and SSSI site is located approximately 1km north of the Blindwells site. It is considered that this site could be indirectly affected by leisure use and visiting pressures. SNH have indicated that an Appropriate Assessment may be required in order to assess potential impacts on the Firth of Forth SPA.</p>
Water Quality and Resources	<p>The Seton Burn runs through northwest of site and has been shown by SEPA's river monitoring classification scheme to have poor water quality.</p> <p>There are some Manmade lagoons and drainage channels in northern section of the Blindwells site. There are a number of groundwater pumps on the site which service the drainage channels.</p> <p>The existing quality of water within the site area is deemed at present to be poor. This could be exacerbated by future population growth and associated commerce within the area.</p> <p>At present spare capacity exists for the supply of drinking water and foul drainage indicating that there is adequate scope for increasing demands.</p> <p>There is a potential requirement for sea outfalls or the reinforcement of existing waste water flows to account for increasing 'clean' discharge.</p>
Air Quality	<p>The Blindwells site is located adjacent to the A1 trunk road (which is the primary route between SE Scotland and NE England) and the A198. Levels of traffic in East Lothian have been growing year on year.</p> <p>Cockenzie Coal-Fired Power Station is located approx 2 km to the north of the site, and is the most significant source of pollution within the area surrounding the Blindwells site.</p>

Topic Chapter	Key Information
	<p>Currently air quality information from East Lothian Council indicates that no environmental limits have been breached at the Blindwells site, although the Blindwells development has the potential to generate emissions that may impact on air quality on the site.</p> <p>The Scottish Noise Mapping data indicates that the Blindwells site is not with an area of existing significant noise pollution.</p>
Climatic Factors	<p>Changes in temperature and rainfall have been noted and are predicted to increase. Sea levels are predicted to rise and will impact upon coastal locations. East Lothian emits more CO₂ (in terms of per head of population) in proportion to Scotland as a whole. The National Climate Change Programme seeks to encourage energy efficiency and renewable technologies. Energy and gas consumption is reducing domestically but is larger than the Scottish average.</p> <p>There is currently no flood risk identified on site. However, the implications of the Flood Risk Management Bill should also be considered. This will require SEPA to produce a flood risk assessment and flood hazard mapping which could cover the Blindwells site (although dependant on the identification of flood risk management districts). Therefore there is potential for alteration of the spatial pattern of identified flood risk.</p> <p>Development at the Blindwells site will lead to an increased demand for gas and electricity. To help East Lothian meet the national average demand (which is also reducing) opportunities to assist in limiting the requirement for heating and energy use (such as appropriate design for lighting and energy efficiency) and providing renewable energy sources should be explored by the Development Framework.</p>
Landscape	<p>Part of the Firth of Forth approximately 1 km north of the site is designated as an Area of Great Landscape Value (AGLV). The Historic Garden and Designed Landscape (HGDL) of Seton House Palace is located approximately 1km to north east of site. The site has a high visual sensitivity.</p> <p>The development site is not within any designated landscape and as such is unlikely to have direct effects on valued and conserved landscapes. However, there are potentially indirect effects in terms of effects on important views and landscape off site such as the Firth of Forth AGLV.</p> <p>SNH have indicated the importance protecting the landscape setting of the St Germain's non-inventory designed landscape.</p>
Cultural Heritage	<p>There are 4 National Monument Record of Scotland sites on the site. The Blindwells site is surrounded by a number of Scheduled Ancient Monuments (6) and Listed Buildings (16). The site of the Battle of Prestonpans is located to the north west of the Blindwells site.</p> <p>The Blindwells site has a high visual sensitivity. A number of designated sites (SAMS, Listed Buildings, conservation areas, etc) are located in the vicinity. Historic Scotland has indicated that there is potential for archaeological</p>

Topic Chapter	Key Information
	<p>remains relating to the Battle of Prestonpans, although given the previous use of the site as an opencast mine, this is potentially low.</p> <p>There are a number of designated heritage and conservation sites surrounding the Blindwells site. However, it is unlikely that these will be significantly affected by the Development Framework. It is considered that the Prestonpans Battle route could be influential on the guidance contained within the Development Framework, helping to produce a new settlement that is sensitive to its valued surroundings.</p>
Community	<p>The settlements surrounding the site are within the bottom two quartiles for crime, education and health deprivation. The surrounding settlements Tranent, Prestonpans, Cockenzie and Port Seton are traditional mining communities.</p> <p>The Scottish Indices of Multiple Deprivation reveal that at the Super Output area level the site performs relatively well in terms of its level of deprivation. However, the communities that are located in close proximity to the site, such as Tranent and Port Seton have greater deprivation issues. For the Blindwells development to be sustainable, and as such provide high quality living environment that will help to achieve acceptable levels of physical and mental health, the development should seek options to achieve this through careful planning and design, such as areas in which physical activity can occur. Job creation can also help to increase the standard of living and general levels of health.</p>
Material Assets	<p>The Blindwells site is adjacent to the A1 trunk road and A198 road. The East Coast Mainline railway passes along northern part of site boundary. There is an electrical sub station located at west of site. There are no utilities services located on the Blindwells site, although there are utilities immediately surrounding the site.</p> <p>The Winton Loan Right of Way/Core Path is located to the eastern perimeter of the site. In terms of local community facilities, there are a number of GP surgeries, secondary schools, primary schools, leisure centres, etc in the surrounding settlements (Tranent, Cockenzie and Port Seton, Longniddry, Macmerry).</p> <p>Accessibility to open space is important, potential for linkages to existing core path network.</p> <p>The baseline data at this level has not revealed any particular issues of concern for the assessment of the Blindwells development. During the subsequent assessment stage of this SEA the promotion of any facilities and utilities that may be included within the Development Framework will be considered in terms of impacts on the health and welfare of the population.</p>

1.3.4 A suite of 8 environmental objectives and sub objectives have been established, which under-pin the entire SEA process. These objectives have been used to assess whether the Development Framework is likely to give rise to significant environmental effects. The SEA objectives cover the relevant environmental topics that are

described within the SEA Directive and The Act. The SEA objectives are presented below.

Table 1.3: SEA assessment framework for Blindwells

SEA Objective and sub objectives
<p>1) Promote the sustainable use of on site and off site land resources</p> <ul style="list-style-type: none"> • Ensure that the Development Framework will not exacerbate existing ground conditions • Promote the reduction of waste and the sustainable management of waste • Avoid adverse effects on areas with high quality soils
<p>2) Protect and enhance the natural environment</p> <ul style="list-style-type: none"> • Ensure internationally designated sites such as the Firth of Forth SPA are protected as required by European legislation • Avoid adversely impacting on the condition of East Lothian's SSSI • Where possible enhance biodiversity at the Blindwells site
<p>3) Maintain and enhance the water quality of the local waterways and coastal areas</p> <ul style="list-style-type: none"> • Encourage water use efficiency • Prevent impacts from point source and diffuse pollution • Ensure that development does not place an undue burden on existing water and waste water facilities
<p>4) Encourage an integrated approach to the reduction of flood risk</p> <ul style="list-style-type: none"> • Avoid development in locations at risk from flooding and mitigate residual flood risk through appropriate measures • Promote and incorporate SuDs where run off could increase flood risk • Take account of future climate change in terms of managing flood risk
<p>5) Avoid increasing emission of air pollutants and impacting the health of the population and natural environment</p> <ul style="list-style-type: none"> • Ensure that new land uses do not adversely contribute to the emission of pollutants • Minimise the need to travel and avoid measures that may increase congestion
<p>6) Reduce greenhouse gas emissions and promote adaptation for future climate change</p> <ul style="list-style-type: none"> • Minimise demand for raw materials • Seek to reduce the consumption of electricity and gas • Increase the use of renewable energy technology • Minimise the need to travel by motorised vehicles

7) Protect and enhance the historic environment and landscape

- Protect and enhance statutory and locally designated features of importance, including archaeology
- Protect and enhance the historic and valued landscape character
- Seek to integrate valued views of landscape features when planning for future development
- Promote high quality and considerate design

8) To improve the health and well-being of the population and reduce inequalities in health

- Promote healthy and active lifestyles through encouraging walking and cycling as well as the provision of sporting, recreation and community facilities
- Promote access to multi functional open space
- Reduce crime and the fear of crime, including through 'designing out of crime'
- Promote accessibility to healthcare services

1.4 Assessment Results

1.4.1 When assessing the document we have assumed that it is the content of the Development Framework that is under assessment rather than the principle of development at the site. The Development Framework does not set a level and figure for new housing and development as this has previously been set in policy H1 of the East Lothian Local Plan 2008. Table 1.4 below summarises the assessment of the Development Framework against the SEA Framework.

Table 10.1: Results of the assessment of the Development Brief

SEA Framework Objective	Significance of Effect
1) Promote the sustainable use of on site and off site land resources	0
2) Protect and enhance the natural environment	+
3) Maintain and enhance the water quality of the local waterways and coastal areas	
4) Encourage an integrated approach to the reduction of flood risk	
5) Avoid increasing emission of air pollutants and impacting the health of the population and natural environment	
6) Reduce greenhouse gas emissions and promote adaptation for future climate change	
7) Protect and enhance the historic environment and landscape	+
8) To improve the health and well-being of the population and reduce inequalities in health	++

1.4.2 The results indicate that the guidance contained within the planning brief will result in general in significant positive effects across the environmental objectives. The assessment did suggest measures for mitigation and enhancement in the form of recommendations which are as follows:

- The Development Framework could benefit from referring to potential sources of water supply (i.e. potential of on site groundwater supply, Grey water recycling etc), and the need to minimise and use water efficiently.
- Whilst the brief does include measures for limiting the potential for flood risk at the site, it is felt that the brief does not specifically reference climate change adaptation as a key component of the design of new buildings. Promoting factors such as orientation and encouraging housing with drying space (as recommended within the Ecohomes guidance) within the design section will help to illustrate that Sustainable Development is promoted at the heart of the Framework and is not a concept to bolt on.
- Further advice should be included on the protection and integration of some of the views to valued landscape on the site (e.g. to the Firth of Forth and Arthurs seat).

1.5 Monitoring

1.5.1 Following consultation on the Development Framework and this Environmental Report the content of both reports will be reviewed to ensure that all environmental effects have been identified. Upon satisfactory completion of these reviews it is a requirement of Section 18 of the Environmental Assessment Act (Scotland) 2005 to produce a post-adoption SEA Statement. The Act stipulates this must include “*the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme*”.

1.5.2 It is the responsibility of East Lothian Council to monitor the implementation of the Blindwells Development Framework to identify any unforeseen environmental effects and, as a result, take appropriate remedial action.

1.5.3 At this stage, all we can monitor is that the requirements of the DF have been met, through submission of required technical studies and established mitigation, including imposing control mechanisms through any planning permission.

Timescale for Comments:

- 1.5.4 The timescale for comments is Six weeks, consistent with the statutory minimum for SEA consultation. Address to East Lothian Council as per cover note.

2 Introduction

2.1 Introduction

- 2.1.1 East Lothian Council (ELC), have produced a Development Framework for the development of a new settlement at Blindwells, East Lothian. The Scottish Government determined that the Blindwells Development Framework is likely to have significant environmental effects and that a Strategic Environmental Assessment is required.
- 2.1.2 Blindwells is a substantially restored former opencast coal site near Tranent in East Lothian. The site, owned by the Scottish Coal Company Ltd, is allocated in the Edinburgh and Lothians Structure Plan 2015 as one of its core development areas within which a new settlement should be located. The site is also allocated for a new settlement in the East Lothian Local Plan 2008.
- 2.1.3 This Environmental Report documents the assessment of the options for the emerging Blindwells Development Framework.

2.2 The SEA Process

- 2.2.1 In Scotland the SEA of land use planning documents is required under the Environmental Assessment Act¹. The Act interprets the requirements of the SEA Directive². The Act sets out the processes that must be undertaken as part of an SEA and the content that an assessment must include.
- 2.2.2 In order to implement the SEA Directive the UK Government released guidance on SEA³. The Environmental Assessment Act in Scotland was supported by the Scottish Governments SEA toolkit⁴ with associated templates.
- 2.2.3 The SEA Toolkit sets out the stages of SEA and is illustrated in Figure 2.1. The process incorporates a number of distinct stages, designed to create a robust assessment of potential significant environmental effects.

¹ Environmental Assessment Act (Scotland) 2005 Part 1 Section 5 (3a) Available at: http://www.opsi.gov.uk/legislation/scotland/acts2005/asp_20050015_en_1

² Directive 21/42/EC: On The Assessment Of The Effects Of Certain Plans and Programmes On The Environment Available at: <http://www.environ.ie/en/Publications/Environment/Miscellaneous/FileDownload,1805,en.pdf>

³ ODPM (2005) A Practical Guide to the Strategic Environmental Assessment Directive London:HMSO

⁴ Scottish Government (2006) Strategic Environmental Assessment (SEA) Tool Kit

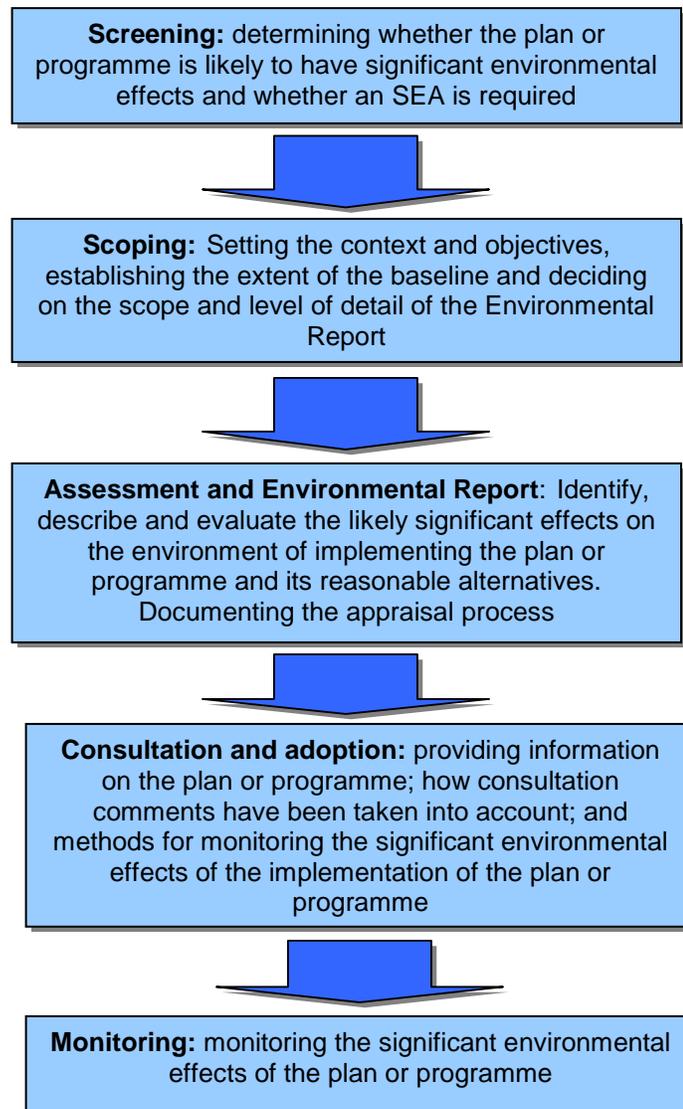


Figure 2.1. Five stage approach to SEA

2.2.4 Acting as the responsible authority, East Lothian Council, on the guidance of Scott Wilson determined that the Blindwells Development Framework will require an SEA on the 9th October 2008.

2.2.5 Scott Wilson, on behalf of East Lothian Council, then produced a Scoping Report to identify the context of the Blindwells Development Framework in relation to other plans, programmes and strategies, as well as identifying the environmental baseline from which the Blindwells Development Framework will be assessed and the assessment methodology that will facilitate this process. The Scoping Report was issued to the Consultation Authorities (Scottish Natural Heritage (SNH), Scottish

Environment Protection Agency (SEPA) and Historic Scotland) through the Scottish Government's SEA Gateway service. The Scoping Report was sent to the SEA Gateway on the 5th December 2008 and was open to consultation for 5 weeks in line with the requirements of the Environment Act⁵.

- 2.2.6 Responses from the Consultation Authorities in respect to the Scoping Report were received on the 9th of January 2009. The Scoping Report was updated and has been used as the basis for this assessment.
- 2.2.7 This Environmental Report details the assessment of the options for the Development Framework. Proposing measures for mitigation and enhancement where required and proposing a framework for monitoring.

2.3 The Blindwells Development Framework

The Blindwells Site

- 2.3.1 The site is located in the western part of East Lothian close to the existing communities of Prestonpans, Port Seton, Cockenzie, Longniddry and Tranent as shown in Figure 2.1. The site is bounded by the East Coast Mainline Railway to the north, the A1 trunk road to the south, the A198 to the west, and agricultural land to the east.
- 2.3.2 The Blindwells site was previously used as an open cast coal mine during the 1980's and 90's. It has since been largely restored to agricultural purposes and the land to the east of the site is also currently used for agricultural purposes.

Planning context

- 2.3.3 Development at the Blindwells site will help to achieve the aspirations for housing set out in the National Planning Framework 2 (2008) meeting the aspiration for '*enough houses to be built of the right type and in the right places*'⁶.
- 2.3.4 The development of the Blindwells site as a new urban settlement is further supported in the Edinburgh and the Lothian's Structure Plan 2015 (June 2004). The Structure plan identifies Blindwells as a **Core Development Area (CDA)** for housing and employment provision and states that the location is:

*... "marketable and can accommodate both housing and business development to reduce the level of out-commuting. The development locations can accommodate the required growth without compromising the quality of the East Lothian landscape and the capacity and character of individual settlements. Development also focuses in areas that have, or can be provided with, good public transport accessibility."*⁷

⁵ Environmental Assessment Act (Scotland) 2005 Part 2 Section 15 (2a) Available at: http://www.opsi.gov.uk/legislation/scotland/acts2005/asp_20050015_en_1

⁶ The Scottish Government, (2004), National Planning Framework, p50

⁷ The City of Edinburgh Council, East Lothian Council, Midlothian Council, West Lothian Council, (2004) Edinburgh and the Lothian's Structure Plan 2015, p17

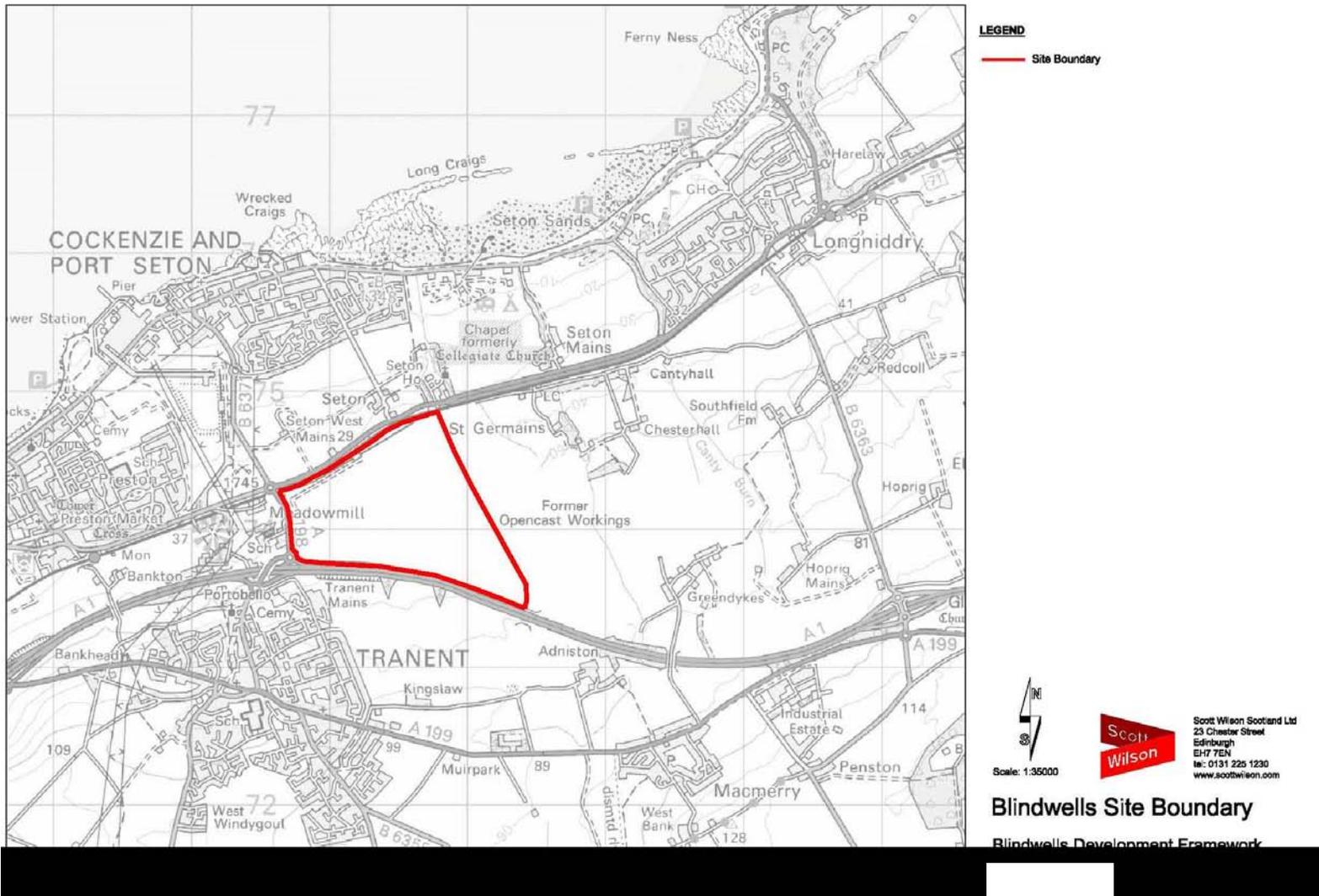


Figure 2.1: Location of the Blindwells Site

- 2.3.5 The adopted East Lothian Local Plan 2008 implicitly supports the development of the Blindwells site in Policy **H1 Blindwells New Settlement**.

Proposal H1: Blindwells New Settlement

Approximately 130 hectares of land is proposed at Blindwells, near Tranent, for the development of a new settlement comprising land capable of accommodating 1600 houses, commercial, social, educational and community facilities, open space, employment and associated infrastructure.

The Council will prepare a Development Framework addressing the development requirements of the site and defining the extent and broad location of the various land uses. The development framework must have regard to the potential longer-term expansion of Blindwells and ensure that this is taken into accounting planning for the area allocated under the present proposal. It will then be the responsibility of the developer to submit for approval a Masterplan consistent with this framework and local plan's development policies. The Masterplan should be submitted prior to or as part of an application for outline or detailed planning permission. Developer contributions are required for all necessary infrastructure, education and community facilities arising as a consequence of this development. The developer must undertake a flood risk assessment.

The Blindwells Development Framework

- 2.3.6 The Development Framework for Blindwells New Settlement in East Lothian has been prepared by East Lothian Council. It sets out the land uses expected from the local plan allocation and how the Council requires the site to be developed. Details of the content of the Development Framework that we have assessed are given in **Section 10** of this report.
- 2.3.6.1.1 The first phase of work towards producing a Development Framework was the production of 3 indicative development options. Development options for the site were considered in broad terms. All of the options have possibilities, however it is considered that Option 1 and 3 may both offer the most positive alternatives. At this stage, without the full extent of technical studies, it is not possible to firm up an agreed option and given they offer the same land uses and final solution this will be agreed at a later stage. Many of the issues identified can be turned into opportunities through appropriate design solutions. It will be for the masterplan to test and arrive at the best feasible environmental option for site development. At this stage the options are not detailed and this allows for flexibility as the constraints and issues with the site are understood in more depth, therefore, this document should be considered as work in progress. The Development Framework and masterplan will address matters in more detail having regard to up to date information, and use this document to assist in the process. Full details of the options that we have assessed are given in Section 9 of this report. Please note there may be flexibility in final option as technical studies move further along.
- 2.3.7 Full details of the options that we have assessed are given in **Section 9** of this report.

- 2.3.8 Once adopted by East Lothian Council the Blindwells Development Framework will be a material consideration for the developer(s) of the site when preparing a single Masterplan for the entire allocated site. The Masterplan must describe and illustrate how the development requirements, design principles and submission requirements of this Development Framework have been met.

3 SEA Requirements Checklist

3.1 Introduction

3.1.1 Table 3.1 below indicates where specific requirements of the Environmental Assessment (Scotland) Act 2005 ('the Act') can be found within this report. This report is one of several key reports prepared as part of the SEA process and the table records in which sections of the report information can be found.

Table 3.1: SEA Directive requirements checklist

Environmental Report Requirements	Section of this Report
(a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;	Section 2.3 of this report and Scoping Report
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Summarised in Section 5 and in full in the Scoping Report
(c) the environmental characteristics of areas likely to be significantly affected;	Summarised in Section 5 and in full in the Scoping Report
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC (The Birds Directive) and 92/43/EEC (The Habitats Directive);	Summarised in Section 5 and in full in the Scoping Report
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	Section 4 and Scoping Report
(f) the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Sections 8, 9 and 10 Appendices 1, 2 and 3
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Sections 8, 9 and 10 Appendices 1, 2 and 3
(h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 8 and 9
(i) a description of the measures envisaged concerning monitoring in accordance with Article 10;	Section 10 and subsequent SEA Statement
(j) a non-technical summary of the information provided under the above headings.	Section 1

4 Context

4.1 Introduction

4.1.1 The requirement to undertake a context review arises from the SEA Directive:

The ‘Environmental Report’ required under the SEA Directive should include:

“an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes” (Annex 1(a))

4.1.2 Many policies, plans etc. also set out environmental and wider sustainability objectives. Under the SEA Directive, reference must be made to environmental objectives, a principal that is reinforced by Schedule 3(1) of the Act. The context review satisfies the following requirement:

The ‘Environmental Report’ required under the SEA Directive should include:

“the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme...” (Annex 1(e))

4.2 Assessment of Plans, Programmes and Strategies

4.2.1 The SEA Scoping report documents the full context review, and we have attached this in Appendix 4. Table 4.1 below lists the plans, programmes, strategies and initiatives (PPSIs) reviewed for the purposes of this SEA.

4.2.2 With respect to this process, the consultants prepared an initial list of those PPSs considered relevant. This list was then discussed with the East Lothian Council to ensure the scope of documents covered all relevant local PPSI.

Table 4.1: List of relevant plans, programmes and strategies reviewed

International / European
Directive 79/409/EC; The Conservation of Wild Birds 1979
Directive 92/42EC; The Conservation of Natural Habitats of Wild Fauna and Flora 1992
Directive 2000/60/EC; The Water Framework Directive
Directive 1966/62/EC; Ambient Air Quality and Management
National
Enjoy the Outdoors – An SNH Policy Framework
Scottish Outdoor Access Code – Approved Code 2004
Sport 21 2003-02007 The national Strategy for Sport – Shaping Scotland’s Future
Disability Discrimination Act 2005
Scotland’s National Transport Strategy (2006)
National Waste Strategy 1999
Land Reform (Scotland) Act 2003
Wildlife and Countryside Act 1981

Nature Conservation Bill (Scotland) 2004
Climate Change; the UK Programme (2006)
Air Quality Strategy for England, Scotland, Wales & NI: Working Together for Clean Air
UK Biodiversity Action Plan
It's in Your Hands - Scottish Biodiversity Strategy
Securing the Future – Delivering UK Sustainable Development Strategy
Choosing Our Future – Scotland's Sustainable Development Strategy (2005)
National Planning Framework 2
Scottish Planning Policy (2008)
SPP2 Economic Development (2002)
SPP3 Planning for Homes (2008)
SPP 6 Renewable Energy (2007)
NPPG 8 Town Centres and Retailing (2006)
NPPG 10 Planning and Waste Management (1996)
SPP 11 Open Space and Physical Activity (2007)
NPPG 14 Natural Heritage (1999)
SPP 17 Planning for Transport (2005)
SPP 20 The Role of Architecture and Design Scotland (2005)
SPP 23 Planning and the Historic Environment (2008)
Scottish Historic Environmental Policy (2008)
Planning Advice Note 83: Masterplanning
Local
Lothian Landscape Character Assessment (1998)
Edinburgh and Lothian's Structure Plan 2015 (2004)
East Lothian Council Adopted Local Plan 2000 and East Lothian Local Plan Finalised 2005 (to be adopted October 2008)
Active East Lothian – Playing Our Part (2004)
East Lothian Core Paths Consultation (2008)
East Lothian Local Transport Strategy (2008)
East Lothian Joint Economic Strategy (2006)
East Lothian Tourism Action Plan 2004-2007 (2004)
Consultation Draft East Lothian Heritage Strategy 2007-2010 (2007)
East Lothian Community Engagement Strategy 2007-2010 (2008)
Draft East Lothian Council Sustainability Statement (2007)
Draft East Lothian Environment Strategy 2007-2010 (2007)
East Lothian Council SPG 3: Design Standards for New Housing Areas (2008)
East Lothian BAP (2008)
East Lothian Rights of Way Booklet
Edinburgh & Lothian's Forest Habitat Network Framework
East Lothian School Estate Asset Strategy (March 2007)

4.2.4 Each PPSI was reviewed using a standard pro-forma, recording the environmental objectives of the PPSI and the Implications for the Development Framework and its assessment.

4.3 Key messages from context review

4.3.1 During the initial PPS review, a number of key messages were identified that should be taken into account in developing the Blindwells New Settlement Development Framework and in undertaking the SEA process. These are presented in Table 4.2 below.

Table 4.2: Context review key messages

Key Messages
The Development Framework must avoid undue adverse affects on sites of biodiversity interest and must avoid any adverse affects on European level designated sites
Seek to enhance biodiversity where this is possible
The Development Framework should not lead to the pollution of watercourses, should seek to avoid the use of drainage culverts where possible, and groundwater and consider any flood risk within the site.
Opportunities to promote sustainable water use should be taken in new development
Seek to promote new and accessible open spaces and leisure facilities
Promote the use and access to sustainable transport and avoid unsustainable increases in traffic
Ensure access to all features and facilities for disabled groups
Reduce waste production, increase waste recovery, reuse and recycling
Seek to implement all options to include low carbon technology
Look to incorporate advice on sustainable design and construction features to reduce energy use, reduce the risks of flooding, encourage biodiversity and reduce waste.
To protect and, where appropriate, enhance the historic environment and cultural heritage
Seek to provide a mix of housing tenures and affordability and support these with a range of retail, employment and leisure opportunities in order to reduce transport demands
Seek all opportunities to engage with the local population on decisions and options for future development on the Blindwells site.

5 Baseline Information

5.1 Introduction

5.1.1 The collection of baseline information is a key component of the SEA process and a legal requirement under the SEA Directive. Baseline information helps to provide a basis for predicting and monitoring effects and assembling baseline data helps to identify sustainability problems.

5.1.2 The SEA Directive's requirements in relation to baseline information are:

The 'Environmental Report' required under the SEA Directive should include:

"the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme"

"the environmental characteristics of areas likely to be significantly affected" (Annex 1(b) and (c))

5.1.3 When collecting baseline data, the purpose is to assemble sufficient data on the current and likely future state of the area to enable the Blindwells Development Framework potential effects to be adequately predicted.

5.1.4 The Blindwells Development Framework (SEA) Scoping Report sets out Baseline information in a narrative format using the 'topic based' approach that is recognised as best practice methodology. The report sets out baseline information in the form of text and tables describing relevant indicator information and maps and graphical information. The data is fully referenced and is sourced from a number of recognised information holders. The following topic areas were considered:

- Ground Resources;
- Biodiversity, Flora and Fauna;
- Water Quality & Water Resources;
- Air Quality;
- Climatic Factors;
- Landscape;
- Cultural Heritage;
- Community; and
- Material Assets.

5.2 Relevant Aspects of the Current State of the Environment

- 5.2.1 The existing environmental baseline of the Blindwells New Settlement site was used to assess the impacts of the emerging options for the Blindwells Development Framework. The options for the Development Framework have been assessed against this evidence.
- 5.2.2 The baseline data has been used to identify trends and key environmental issues associated with these options. The identification of key environmental issues provides an opportunity to define key areas of response for the Blindwells Development Framework and to develop sustainable plan objectives and options for resolving these.
- 5.2.3 The SEA Directive requires the responsible authority to identify “*the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme*”. Where possible and within the bounds of reasonable assumptions the Scoping Report identifies these.
- 5.2.4 Table 5.1 below summarises the baseline data under the topic chapter headings of the Scoping Report presented for consultation.

Table 5.1: Environmental Baseline Information

Topic Chapter	Key Information
Ground Resources	<p>Geological mapping shows the area surrounding the Blindwells site is formed from Carboniferous Rock. The Blindwells site was previously excavated as an opencast coal mine, and has since been backfilled with rock and drift material. The surrounding area consists of Grade 1 and 2 quality prime agricultural land. There is currently almost no waste generation from the site.</p> <p>The previous use of the Blindwells site as an opencast mine may mean that whilst there will be minimal impacts on geology and soils from further development there is potential for ground instability issues, even with the previous restoration of the site.</p> <p>East Lothian has made progress towards increasing the percentage of waste sent for composting and recycling. However the total waste arisings has continued to increase.</p>
Biodiversity, Flora and Fauna	<p>There are no specific biodiversity designations or features of interest on the Blindwells site. The Blindwells site consists of improved and semi – improved grassland.</p> <p>The Firth of Forth SPA, Ramsar and SSSI site is located approximately 1km north of the Blindwells site. It is considered that this site could be indirectly affected by leisure use and visiting pressures. SNH have indicated that an Appropriate Assessment may be required in order to assess potential impacts on the Firth of Forth SPA.</p>
Water Quality and Resources	<p>The Seton Burn runs through northwest of site and has been shown by SEPAs river monitoring classification scheme to have poor water quality.</p> <p>There are some Manmade lagoons and drainage channels in northern section</p>

Topic Chapter	Key Information
	<p>of the Blindwells site. There are a number of groundwater pumps on the site which service the drainage channels.</p> <p>The existing quality of water within the site area is deemed at present to be poor. This could be exacerbated by future population growth and associated commerce within the area.</p> <p>At present spare capacity exists for the supply of drinking water and foul drainage indicating that there is adequate scope for increasing demands.</p> <p>There is a potential requirement for sea outfalls or the reinforcement of existing waste water flows to account for increasing 'clean' discharge.</p>
Air Quality	<p>The Blindwells site is located adjacent to the A1 trunk road (which is the primary route between SE Scotland and NE England) and the A198. Levels of traffic in East Lothian have been growing year on year.</p> <p>Cockenzie Coal-Fired Power Station is located approx 2 km to the north of the site, and is the most significant source of pollution within the area surrounding the Blindwells site.</p> <p>Currently air quality information from East Lothian Council indicates that no environmental limits have been breached at the Blindwells site, although the Blindwells development has the potential to generate emissions that may impact on air quality on the site.</p> <p>The Scottish Noise Mapping data indicates that the Blindwells site is not with an area of existing significant noise pollution.</p>
Climatic Factors	<p>Changes in temperature and rainfall have been noted and are predicted to increase. Sea levels are predicted to rise and will impact upon coastal locations. East Lothian emits more CO₂ (in terms of per head of population) in proportion to Scotland as a whole. The National Climate Change Programme seeks to encourage energy efficiency and renewable technologies. Energy and gas consumption is reducing domestically but is larger than the Scottish average.</p> <p>There is currently no flood risk identified on site. However, the implications of the Flood Risk Management Bill should also be considered. This will require SEPA to produce a flood risk assessment and flood hazard mapping which could cover the Blindwells site (although dependant on the identification of flood risk management districts). Therefore there is potential for alteration of the spatial pattern of identified flood risk.</p> <p>Development at the Blindwells site will lead to an increased demand for gas and electricity. To help East Lothian meet the national average demand (which is also reducing) opportunities to assist in limiting the requirement for heating and energy use (such as appropriate design for lighting and energy efficiency) and providing renewable energy sources should be explored by the Development Framework.</p>
Landscape	<p>Part of the Firth of Forth approximately 1 km north of the site is designated as an Area of Great Landscape Value (AGLV). The Historic Garden and Designed Landscape (HGDL) of Seton House Palace is located approximately 1km to north east of site. The site has a high visual sensitivity.</p>

Topic Chapter	Key Information
	<p>The development site is not within any designated landscape and as such is unlikely to have direct effects on valued and conserved landscapes. However, there are potentially indirect effects in terms of effects on important views and landscape off site such as the Firth of Forth AGLV.</p> <p>SNH have indicated the importance protecting the landscape setting of the St Germain's non-inventory designed landscape.</p>
<p>Cultural Heritage</p>	<p>There are 4 National Monument Record of Scotland sites on the site. The Blindwells site is surrounded by a number of Scheduled Ancient Monuments (6) and Listed Buildings (16). The site of the Battle of Prestonpans is located to the north west of the Blindwells site.</p> <p>The Blindwells site has a high visual sensitivity. A number of designated sites (SAMS, Listed Buildings, conservation areas, etc) are located in the vicinity. Historic Scotland has indicated that there is potential for archaeological remains relating to the Battle of Prestonpans, although given the previous use of the site as an opencast mine, this is potentially low.</p> <p>There are a number of designated heritage and conservation sites surrounding the Blindwells site. However, it is unlikely that these will be significantly affected by the Development Framework. It is considered that the Prestonpans Battle route could be influential on the guidance contained within the Development Framework, helping to produce a new settlement that is sensitive to its valued surroundings.</p>
<p>Community</p>	<p>The settlements surrounding the site are within the bottom two quartiles for crime, education and health deprivation. The surrounding settlements Tranent, Prestonpans, Cockenzie and Port Seton are traditional mining communities.</p> <p>The Scottish Indices of Multiple Deprivation reveal that at the Super Output area level the site performs relatively well in terms of its level of deprivation. However, the communities that are located in close proximity to the site, such as Tranent and Port Seton have greater deprivation issues. For the Blindwells development to be sustainable, and as such provide high quality living environment that will help to achieve acceptable levels of physical and mental health, the development should seek options to achieve this through careful planning and design, such as areas in which physical activity can occur. Job creation can also help to increase the standard of living and general levels of health.</p>
<p>Material Assets</p>	<p>The Blindwells site is adjacent to the A1 trunk road and A198 road. The East Coast Mainline railway passes along northern part of site boundary. There is an electrical sub station located at west of site. There are no utilities services located on the Blindwells site, although there are utilities immediately surrounding the site.</p> <p>The Winton Loan Right of Way/Core Path is located to the eastern perimeter of the site. In terms of local community facilities, there are a number of GP surgeries, secondary schools, primary schools, leisure centres, etc in the surrounding settlements (Tranent, Cockenzie and Port Seton, Longniddry, Macmerry).</p> <p>Accessibility to open space is important, potential for linkages to existing core</p>

Topic Chapter	Key Information
	<p>path network.</p> <p>The baseline data at this level has not revealed any particular issues of concern for the assessment of the Blindwells development. During the subsequent assessment stage of this SEA the promotion of any facilities and utilities that may be included within the Development Framework will be considered in terms of impacts on the health and welfare of the population.</p>

5.3 Data ‘gaps’ and availability

5.3.1 In collecting baseline data, ‘gaps’ in coverage are inevitably encountered. Where these have been identified they have been explained within the topic chapters of the Scoping Report.

5.3.2 This identification of data gaps within the production of the baseline data is important to bring transparency to the assessment and to illustrate where there might be uncertainty in the subsequent assessment of the Development Framework.

5.3.3 The following data gaps were highlighted at the Scoping Stage:

- In general it is not always possible to identify indicators and data at both national and local (East Lothian) level, but where possible this has been undertaken. Given the nature of this SEA as an assessment of a defined development area it was difficult to identify relevant indicators at site level. This was only successfully achieved when looking at the indices of deprivation. It was considered that the best approach to the presentation of baseline information was to follow a topic based approach where relevant site information and constraints could be displayed graphically as well as in text and tables.
- Areas where graphical data could not be identified from available published sources for some areas included the location of open spaces, location of local waste facilities (landfill, recycling centres etc) and the location of existing local services (such as GP surgeries). However, the East Lothian Greenspace Audit should soon be finalised.
- The development has the potential to increase local traffic. Trend information on the level of traffic growth on local routes is not available to determine local trends. However, trends at East Lothian level are considered sufficient for this assessment.
- Similarly local air quality data at the site is not available and the assessment will proceed using the trends identified at the East Lothian scale.
- Further studies are being undertaken regarding the infrastructure requirements which will add greater certainty to considerations of capacity for water, energy supply and waste water disposal.

6 SEA Framework and Objectives

6.1 Introduction

- 6.1.1 This SEA is underpinned by a baseline-led approach that is supported by SEA objectives. The SEA objectives and sub objectives form the backbone of this assessment and act as the assessment Framework. The SEA Framework consists of objectives, supported by relevant sub-criteria.
- 6.1.2 It should be noted that the SEA objectives are distinct from the Blindwells Development Framework objectives though they may in some cases overlap with them. SEA objectives should focus on outcomes (or ends), not on how the outcomes will be achieved (inputs or means), as PPS objectives will often tend to do.
- 6.1.3 The process for establishing SEA objectives involves interpreting the data collected from the context review, baseline information, and the existing environmental issues applicable to the Blindwells Development Framework.

6.2 SEA Framework

- 6.2.1 The SEA framework against which the development Framework objectives will be assessed is presented in Table 6.1 below.

Table 6.1: SEA assessment framework for Blindwells

SEA Objective and sub objectives
<p>1) Promote the sustainable use of on site and off site land resources</p> <ul style="list-style-type: none"> • Ensure that the Development Framework will not exacerbate existing ground conditions • Promote the reduction of waste and the sustainable management of waste • Avoid adverse effects on areas with high quality soils
<p>2) Protect and enhance the natural environment</p> <ul style="list-style-type: none"> • Ensure internationally designated sites such as the Firth of Forth SPA/Ramsar are protected as required by European legislation • Avoid adversely impacting on the condition of East Lothian's SSSI • Where possible enhance biodiversity at the Blindwells site
<p>3) Maintain and enhance the water quality and ecological status of the local waterways and coastal areas</p> <ul style="list-style-type: none"> • Seek to achieve good ecological status of waterways • Encourage water use efficiency • Prevent impacts from point source and diffuse pollution • Ensure that development does not place an undue burden on existing water

and waste water facilities

4) Encourage an integrated approach to the reduction of flood risk

- Avoid development in locations at risk from flooding and mitigate residual flood risk through appropriate measures
- Promote and incorporate SUDS in compliance with regulations
- Take account of future climate change in terms of managing flood risk

5) Avoid increasing emission of air pollutants and impacting the health of the population and natural environment

- Ensure that new land uses do not adversely contribute to the emission of pollutants
- Minimise the need to travel and avoid measures that may increase congestion

6) Reduce greenhouse gas emissions and promote adaptation for future climate change

- Minimise demand for raw materials
- Seek to reduce the consumption of electricity and gas
- Increase the use of renewable energy technology
- Minimise the need to travel by motorised vehicles

7) Protect and enhance the historic environment and landscape

- Protect and enhance statutory and locally designated features of importance, including archaeology
- Protect and enhance the historic and valued landscape character
- Seek to integrate valued views of landscape features when planning for future development
- Promote high quality and considerate design

8) To improve the health and well-being of the population and reduce inequalities in health

- Promote healthy and active lifestyles through encouraging walking and cycling as well as the provision of sporting, recreation and community facilities
- Promote access to multi functional open space
- Reduce crime and the fear of crime, including through 'designing out of crime'
- Promote accessibility to healthcare services

7 Methodology

7.1 Introduction

7.1.1 The SEA has been produced in line with current Scottish and UK guidance, including the Scottish Executive's SEA Toolkit, and utilising Scott Wilson's experience of SEA.

7.1.2 This section sets out the methodology that has been used for the assessment of the options for the Blindwells Development Framework.

7.2 Approach to the Assessment of the Blindwells Development Framework

7.2.1 The assessment has been undertaken in a series of stages comprising the following:

- Assessment of the Development Framework vision
- Assessment of the options included in the Blindwells Options Report
- Discussion of the 'business as usual scenario'
- Assessment Draft Development Framework

7.2.2 We have employed the assessment techniques discussed within the SEA Toolkit and have assessed each of the components above against the SEA Framework developed in the scoping stage of the process. For the purposes of the assessment a matrix based methodology has been employed. We have used our professional judgement based on the evidence presented in the Scoping Report using the scoring system illustrated in Table 7.1 below. The results of the matrix assessment are presented in Appendices 1 to 3.

Table 7.1: Appraisal scoring symbols

Symbol	Likely effect on the SA Objective
++	The option is likely to have a very positive impact
+	The option is likely to have a positive impact
0	No significant effect / no clear link
?	Uncertain or insufficient information on which to determine impact
-	The option is likely to have a negative impact
--	The option is likely to have a very negative impact
I	The option could have a positive or a negative impact depending on how it is implemented

7.2.3 SEA can provide a powerful decision aiding tool that can be used to help refine the Development Framework to minimise any adverse environmental effects and maximise positive effects as promoted within the SEA Toolkit. Figure 7.1 below illustrates the integrated approach to the production of the Development Framework and SEA.

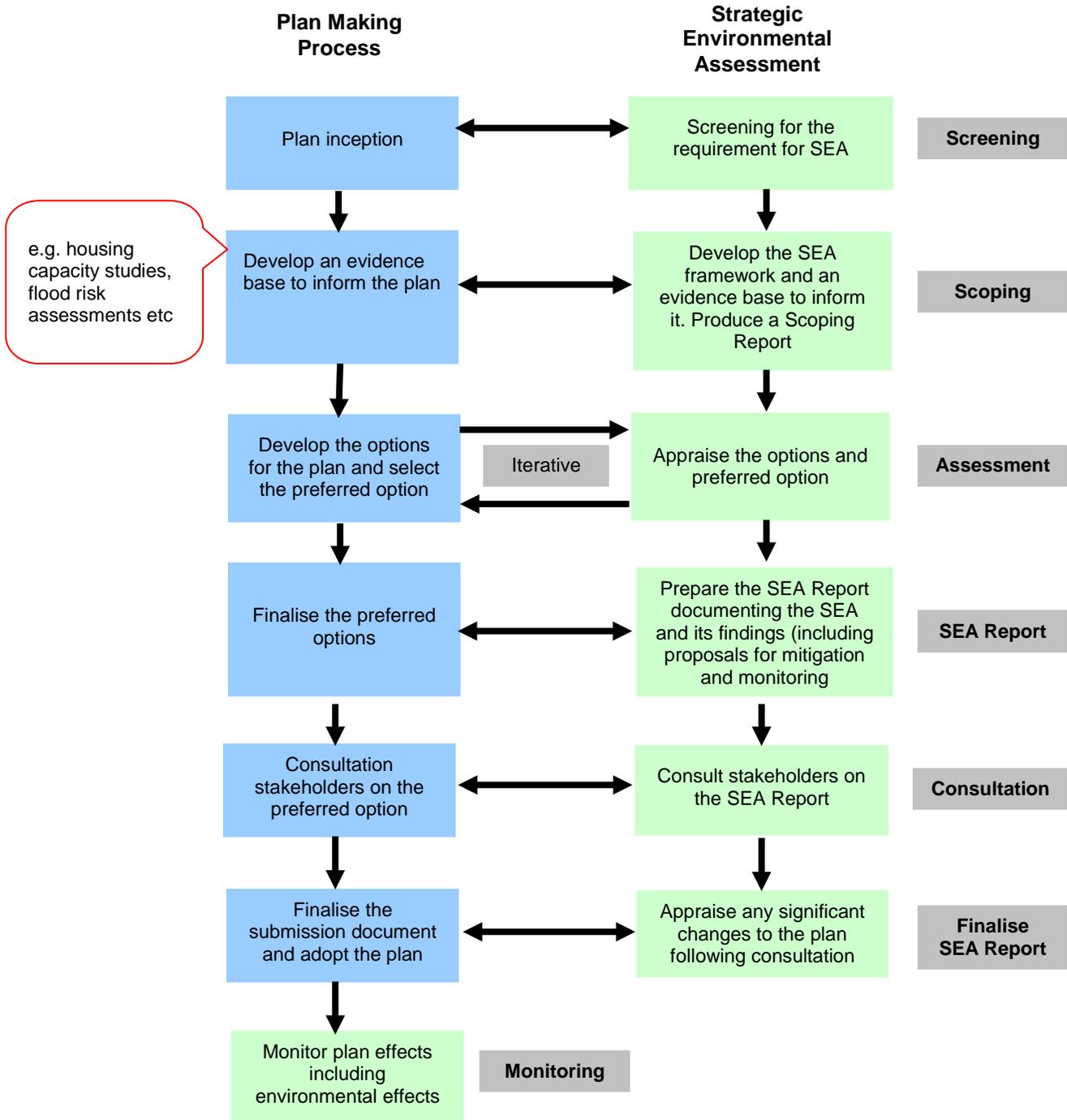


Figure 7.1: Plan and SEA processes and integration

- 7.2.4 In undertaking the SEA we have employed a matrix based assessment methodology as discussed within the Scottish Governments SEA Toolkit. The subsequent chapters detail the results of each stage of the assessment. The detailed assessment tables are included in appendices summary information has been presented in support of each stage of assessment.
- 7.2.5 We undertook a comparative approach for the assessment of the 3 development options with a more in-depth assessment of the Development Framework that included the identification of temporal effects and cumulative effects. The other impact dimensions⁸ have been discussed as appropriate as part of the narrative information accompanying the assessment.

⁸ As included in Paragraph 2 of Schedule 2 of the Environmental Assessment (Scotland) Act 2005

8 Assessment of the Vision

8.1 Introduction

8.1.1 The following Chapter sets out the assessment of the vision of the Blindwells Development Framework. It is felt that there is little value in assessing the vision in a disaggregated manner where each Development Framework Objective is assessed against each SEA objective. The value in this stage is to view the vision and objectives as a holistic package that sets the direction in which the options for the Development Framework options will develop.

8.1.2 Where pertinent we will make comments relevant to specific objectives and have provided commentary on the assessment below.

8.2 Testing the Blindwells Development Framework Vision

8.2.1 The Options Report includes the following vision.

“The vision for the new settlement is to shape a high quality expandable mixed community consistent with the sustainable development principles set out in national, regional and local planning policy. As such, the following themes underpin the vision:

- **Transport** - to manage traffic around the settlement to ensure a safe environment can and will be created in it, to minimise the need to travel and to encourage and provide opportunities for use of sustainable transport modes in preference to private cars;
- **Local Amenities** - to introduce with the settlement an appropriate scale and range of local facilities so its residents benefit from the amenities provided, so that the viability and vitality of existing towns is not harmed, and so the need to travel is minimised;
- **Community Identity** - to provide in the settlement the physical connections, land use conditions as well as the buildings, public spaces and facilities that can create and will support an integrated mixed community by encouraging, facilitating and providing opportunities for interaction and community capacity building among its residents;
- **Environmental Quality** - to procure high quality design that ensures the new settlement preserves and enhances key natural and historic assets, including where relevant their settings, as well as responds to its wider context and conserves and creates a sense of place for the new community, including an appropriate landscape framework and open space network;
- **Energy Efficiency** - to maximise opportunities in the settlement for appropriate energy efficient, microgenerating and decentralised renewable

energy systems together with measures that will reduce waste and resource consumption;

- **Implementation & Delivery** - *to ensure the phasing and timing of development delivers essential services and infrastructure on time at the capacity required to serve the needs of residents as the settlement grows.*

These themes are co-dependent and equally important. The successful delivery of this vision will be dependant on the early involvement of stakeholders in a context driven and creative design process.”

Vision

- 8.2.2 The matrix included in Appendix 1 of this report details the full assessment of the vision and aims against the SEA Framework.

8.3 Assessment Results

- 8.3.1 The assessment has indicated that the objectives of the Development Framework are in broad conformity to the SEA objectives. However the assessment indicated opportunities to improve upon the environmental performance of the objectives. The suggested improvements are included in the summary below.

Summary (key issues arising; potential mitigation measures; sources of uncertainty; assumptions in making the assessment; important impact dimensions, e.g. cumulative, secondary etc)

The vision for the Blindwells Development Framework can be considered in general to promote a plan that will be considerate of environmental effects. However there are opportunities to further imbed required environmental considerations into the Development Framework by minor alterations to the Development Framework.

The potential influence of climatic changes will be a serious consideration for the long term sustainability of any development at Blindwells. In order to ensure that climate change adaptation and mitigation are at the heart Development Framework it is considered beneficial that a specific reference is added.

9 Blindwells Development Framework Options – Alternatives Considered

9.1 Introduction

9.1.1 The following section details the assessment of the options presented within the options report for the Development Framework. The options are presented in the form of diagrammatic illustrations of potential land use zones. The options presented at this stage are purposely illustrative in order to inform open debate on the best option to proceed. Please note that the local plan allocation has a lot of detail, and fixed elements in the options report identified through technical study have resulted in options based on location of known land uses.

9.2 Options

Option 1

9.2.1 Option 1 is illustrated in Figure 9.1 below

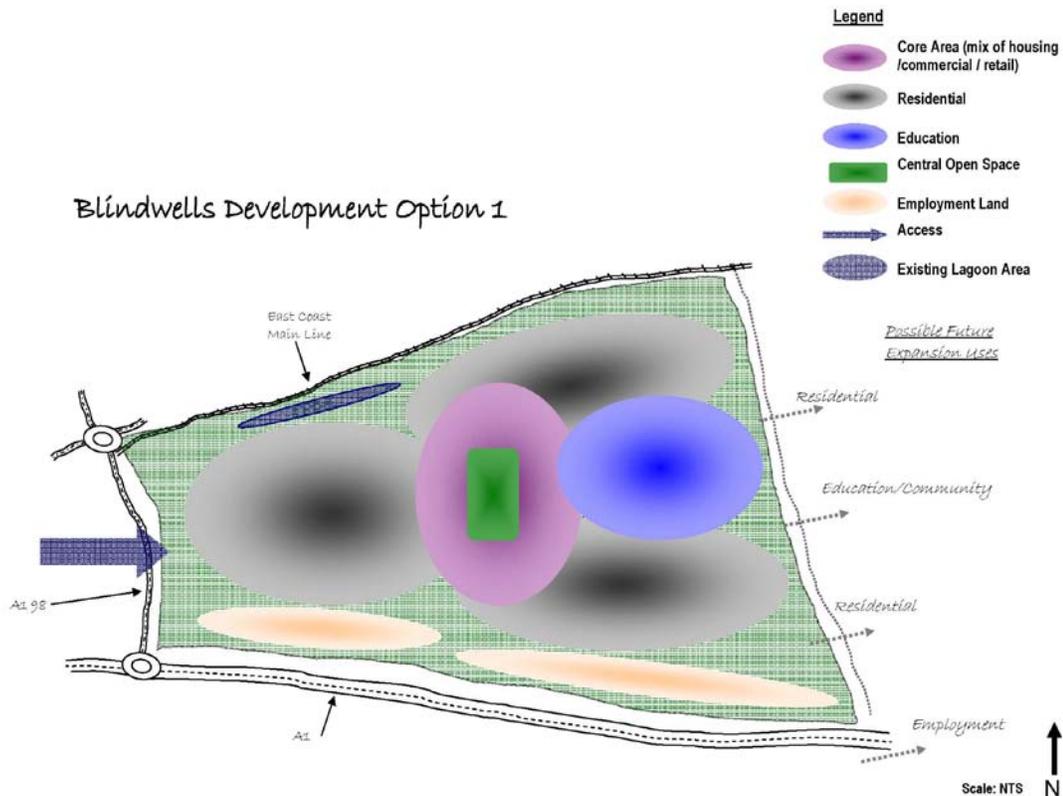


Figure 9.1: Blindwells Development Framework Option 1

9.2.2 This option is characterised by the following:

- Western access – two access points
- A Central Core for mixed use, commercial/retail, community facilities, transport hub and education area
- SUDS ponds & services/landscaped/open space to the north of site
- Employment use along southern boundary, along A1- direct access from entrance
- Recreational and play areas to east adjacent to the Winton Loan Right of Way running north to south
- Residential blocks and related open space and facilities dispersed throughout the site

Option 2

9.2.3 Option 2 is illustrated in Figure 9.2 below

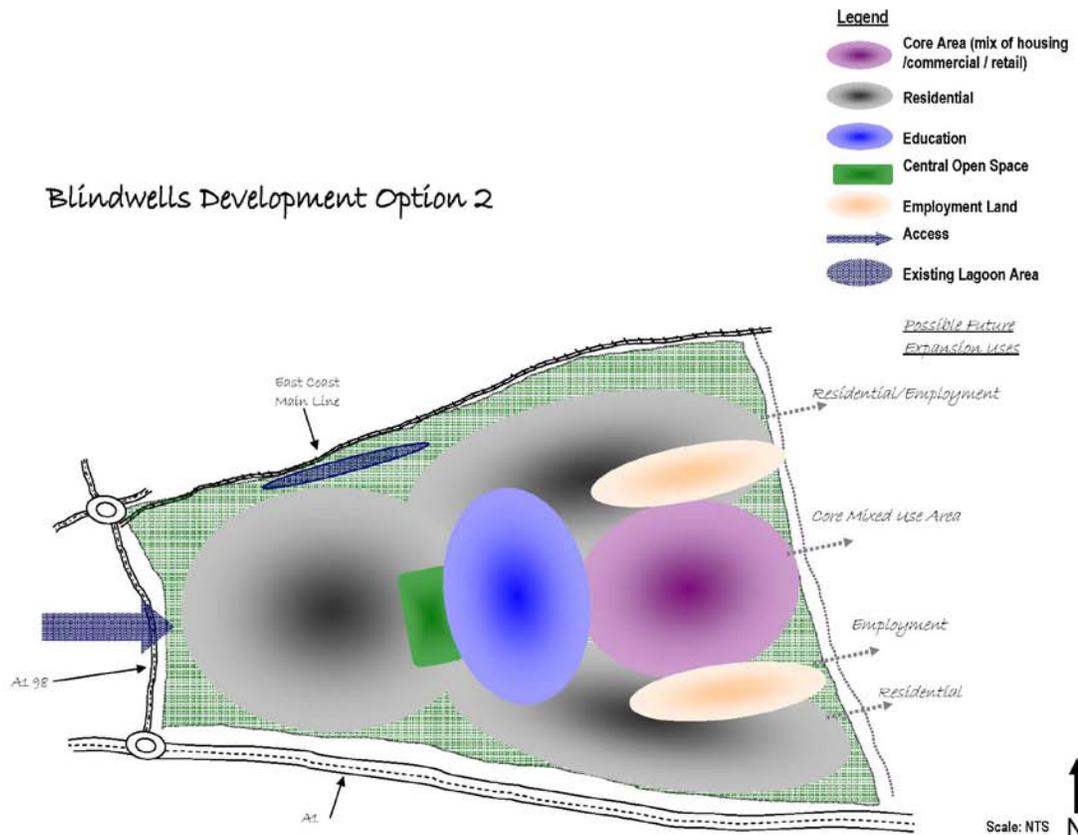


Figure 9.2: Blindwells Development Framework Option 2

9.2.4 This option is characterised by the following:

- Western access – two access points
- Eastern Core for mixed use, commercial/retail, community facilities, transport hub, employment and education area
- Residential/boulevard entrance to a central park/marketplace area
- Suds ponds & services/landscaped/open space on northern boundary
- Residential use along southern boundary, along A1- direct access from entrance and
- Landscaped feature area at entrance
- Difficulty of deliveries/business access to rear of site – ie early deliveries to 'employment areas' through residential streets?
- Houses too close to A1 may result in noise disturbance

Option 3

9.2.5 Option 3 is illustrated in Figure 9.3 below

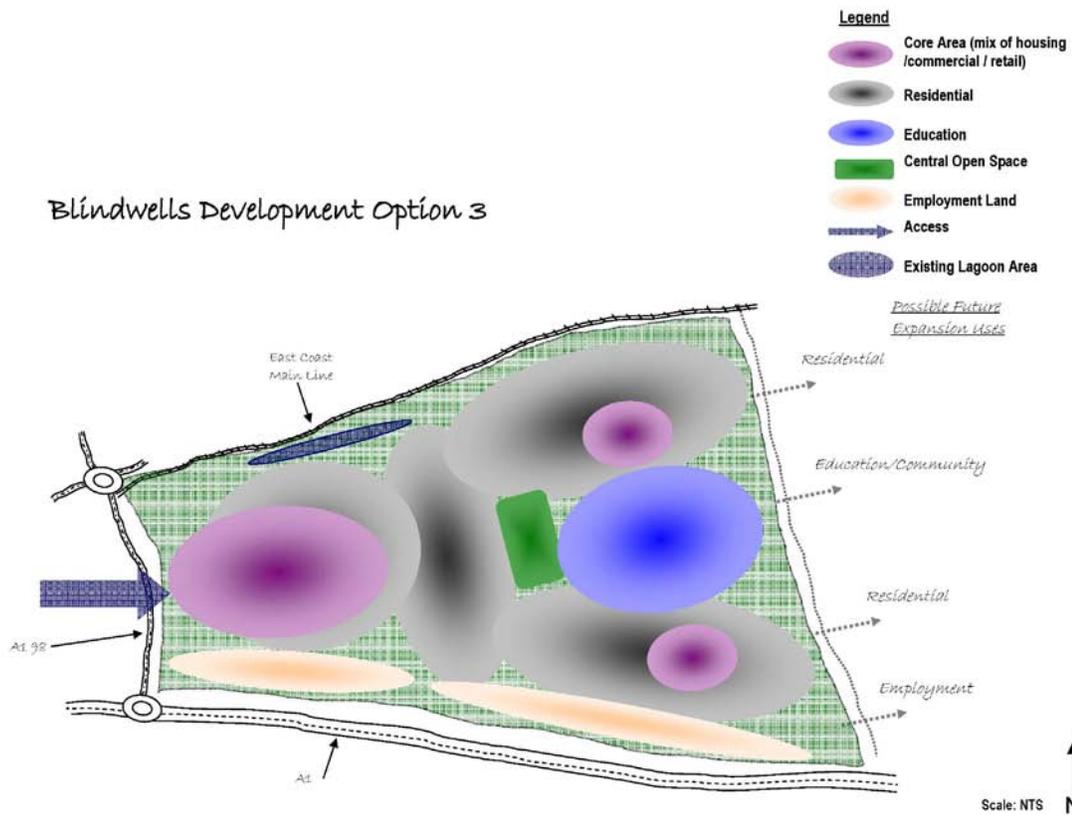


Figure 9.2: Blindwells Development Framework Option 3

9.2.6 This option is characterised by the following:

- Western access – two access points
- Western/direct access into Core/'High Street' area for mixed use, commercial/retail, community facilities, and transport hub
- SUDS ponds & services/landscaped/open space on northern boundary
- Employment Use along visible southern boundary, along A1- direct access from entrance
- Education area in proximity to eastern recreational/open space areas, towards eastern boundary/potential expansion area.

9.3 Assessment of the Options

- 9.3.1 This matrix included in Appendix 2 of this report details the full assessment of the options against the SEA Framework. As the options are at this stage broad and without detailed locations and landuses defined there is some degree of uncertainty in the assessment. The subsequent assessment of the planning brief will contain a more detailed assessment.

Summary (most sustainable option; key issues arising; potential mitigation measures; sources of uncertainty; assumptions in making the assessment; important impact dimensions, e.g. cumulative, secondary etc)

The three options provide different schematic outlines of how the various land uses (Mixed Use, Residential, Commercial, Employment, and Open Space) could be transposed on the Blindwells site. The performance of each option can be seen to be broadly similar in their performance against the SEA objectives.

Option 1 – traditional town layout with centralised town centre proving settlement focal point. Employment area providing buffer between A1 and residential area. Access to core area from site entrance potentially bypassing residential area. Opportunities for eastwards expansion. Links with surrounding countryside to east of site. The location of the central core area and open space is considered to enable greater access to services and to encourage walking and cycling.

Option 2 – Non residential land uses clustered together at eastern section suggesting future town centre after future eastwards expansion of site. Good central access for pupils/students. Some residents exposed to noise from A1. Access to core area and employment land through residential area which is undesirable in terms of amenity of local environment and safety. Opportunities for eastwards expansion. Links with surrounding countryside to east of site.

Option 3 – Main core development area highly accessible from site entrance. Sub core area provides increased access to services for residents. Recreational and play areas link well with Winton Loan footpath which links with neighbouring settlements. Employment area providing buffer between A1 and residential area. Opportunities for eastwards expansion.

At this stage, without the full extent of technical studies, it is not possible to firm up an agreed option and given they offer the same land uses and a final solution will be tested by the masterplan, which will describe an illustrate the best feasible environmental option for site development. Many of the issues identified can be turned into opportunities through appropriate design solutions. At this stage the options are not detailed and this allows for flexibility as the constraints and issues with the site are understood in more depth. The Development Framework and masterplan will address matters in more detail having regard to up to date information, and use the options to assist in the process.

10 Assessment of Draft Development Framework

10.1 Introduction

10.1.1 This section details the assessment of the Draft Blindwells Development Framework. The document sets out the land uses expected in support of the local plan allocation and details how East Lothian Council require the Blindwells site to be developed. This will provide the framework against which applications for development will be considered.

10.2 Likely future of the area without the PPS

10.2.1 The Scottish Governments SEA Toolkit reiterates the directions within the Environment Act that a range of reasonable alternatives are required to be considered. This includes where it is appropriate the “business as usual” scenario.

10.2.2 When considering the potential for a business as usual scenario we have considered the role of the local planning context. As described in section 2 of this report both the Edinburgh and the Lothian’s Structure Plan and the East Lothian Local Plan contain specific reference to the Blindwells site. The local plan sets out the requirement for the production of a development brief in advance of development application at the site.

10.2.3 In this case we do not feel that there is a clear business as usual scenario as the options on the site are clear. These are the production of a planning brief or for the site to remain undeveloped. This option provides the context of the current and future baseline information set out in the scoping of this assessment. Therefore this provides the context against which the Development Framework option will be considered and cannot be assessed as a separate option.

10.3 Development Framework

10.3.1 The draft Blindwells Development Framework contains details on a range of requirements. This includes information under the following headings:

- Movement;
- Housing;
- Education Provision;
- Other Social and Community Uses;
- Recreation and Open Space;
- Built Heritage;

- Biodiversity and Natural Heritage;
- Other Infrastructure;
- Design requirements;
- Landscaping; and
- Sustainable development and Energy Efficiency.

10.3.2 The combination of these elements forms the “Development Framework Option”. The SEA will however suggest alternative content where the assessment identifies that this may improve the environmental performance of the document.

10.4 Assessment Results

10.4.1 The matrix included in Appendix 3 of this report details the full assessment of the Development Framework against the SEA Framework. It is summarised in Table 10.1 below.

10.4.2 In the assessment of the document it has been assumed that it is the content of the Development Framework that is under assessment rather than the principle of development at the site. The Development Framework does not set a level and figure for new housing and development as this has previously been set in policy H1 of the East Lothian Local Plan 2008.

10.4.3 Therefore the assessment reflects on the contribution of the guiding principles of the Development Framework towards achieving the SEA Objectives.

Table 10.1: Results of the assessment of the Development Brief

SEA Framework Objective	Significance of Effect
1) Promote the sustainable use of on site and off site land resources	++
2) Protect and enhance the natural environment	+
3) Maintain and enhance the water quality of the local waterways and coastal areas	+
4) Encourage an integrated approach to the reduction of flood risk	+
5) Avoid increasing emission of air pollutants and impacting the health of the population and natural environment	+
6) Reduce greenhouse gas emissions and promote adaptation for future climate change	I
7) Protect and enhance the historic environment and landscape	+
8) To improve the health and well-being of the population and reduce inequalities in health	++

10.5 Recommendations

10.5.1 The results indicate that the guidance contained within the planning brief will result in general in significant positive effects across the environmental objectives. The assessment suggests measures for mitigation and enhancement in the form of recommendations for the further inclusion of material within the Development Framework which are as follows:

- The Development Framework could benefit from referring to potential sources of water supply (i.e. potential of on site groundwater supply, Grey water recycling etc), and the need to minimise and use water efficiently.
- Whilst the brief does include measures for limiting the potential for flood risk at the site, it is felt that the brief does not specifically reference climate change adaptation as a key component of the design of new buildings. Promoting factors such as orientation and encouraging housing with drying space (as recommended within the Ecohomes guidance) within the design section will help to illustrate that Sustainable Development is promoted at the heart of the Framework and is not a concept to bolt on.
- The Development Framework makes no reference to Ecohomes 2006 Principles, BREEAM for non residential buildings or the emerging new Scottish Building Standards. Promoting requirement for building to undergo an environmental assessment methodology such as these will help the final development towards the achievement of the CO2 reduction targets included in the Development Framework.
- Further advice should be included on the protection and integration of some of the views to valued landscape on the site (e.g. to the Firth of Forth and Arthurs seat).

10.6 Monitoring

10.6.1 Following consultation on the Development Framework and this Environmental Report the content of both reports will be reviewed to ensure that all environmental effects have been identified. Upon satisfactory completion of these reviews it is a requirement of Section 18 of the Environmental Assessment Act (Scotland) 2005 to produce a post-adoption SEA Statement. Paragraph 3(f) stipulates this must include “*the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme*”.

10.6.2 Under Section 19 of The Environmental Assessment Act (Scotland) 2005, the Responsible Authority is duty bound to monitor the significant environmental effects that occur as a result of implementing the qualifying plan, programme or strategy. In this instance, it is the responsibility of East Lothian Council to monitor the implementation of the Blindwells Development Framework to identify any unforeseen environmental effects and, as a result, take appropriate remedial action.

- 10.6.3 The monitoring proposed in the post-adoption SEA Statement will include information on whether the Development Frameworks recommendations have been included within development applications and will draw on local monitoring undertaken by East Lothian Council.

11 Further Information

11.1 Blindwells Development Framework

- 11.1.1 Further information on the Blindwells Development Framework preparation process can be obtained from:

Andrew Stewart
Principal Planner
East Lothian Council
Environment Department
John Muir House
Haddington
EH41 3HA

Telephone: 01620 827827

11.2 SEA

- 11.2.1 Further information on the SEA process can be obtained from:

Director of Environment
East Lothian Council
Environment Department
John Muir House
Haddington
EH41 3HA

Telephone: 01620 827827

- 11.2.2 The following websites provide more general information on SEA:

Office of the Deputy Prime Minister (ODPM) – Introduction to SEA, SEA regulations, SEA guidance
<http://www.odpm.gov.uk> ('Home' > 'Planning' > 'Environmental Assessment' > 'Strategic Environmental Assessment')

Strategic Environmental Assessment Information Service – gateway to the latest information on SEA
<http://www.sea-info.net>

Scottish Executive SEA Gateway
<http://www.scotland.gov.uk>

12 Consultation Update

12.1 Consultation details

12.1.1 The Environmental Report went out for public consultation with the Blindwells Development Framework for 6 weeks on the 25th January 2010. The report was also sent the Scottish Government SEA Gateway for consultation with the statutory bodies, namely Scottish Natural Heritage, Historic Scotland and SEPA. Copies of the consultation feedback letters are attached in Appendix 5. The comments have been reviewed and commented upon as in the table below. 3 comments were received. Any amendments and changes that have been made to this document as a result of the comments have been identified. The comments should be read along with those of the PPS – the Development Framework and the subsequent changes as these documents are interrelated, and comments on the environmental report have in turn led to some amendments to the development framework itself.

12.2 Comments on the Strategic Environmental Assessment Environmental Report and responses

SUBMISSION NUMBER	23
TITLE	Dr
INITIAL	S
SURNAME	Billet
ORGINISATION IF APPLICABLE	SEPA - Senior Planning Officer (SEA Response)
SUMMARY OF COMMENT	<p>The comments related to both the environmental report, and development framework, therefore the changes made to both have been identified.</p> <p>Potential environmental effects of the PPs identified in the Draft SEA ER in relation to the SEA topics soil and waste, water environment and flood risk and air quality were described as positive. However, the consultation authorities considered that the environmental effects on those SEA objectives are better described as neutral on soil and waste and potentially negative on air quality, the water environment and flood risk. SEPA also suggest that the final version of the Development Framework should acknowledge that:</p>

· The extent and any likely impacts of flooding from all sources at the Blindwells New Settlement site are not currently fully understood. A FRA and Drainage Impact Assessment will be required to understand flooding issues, especially groundwater. This information may influence the siting, design and location of any development.

- A FRA should identify safe development levels and natural flood storage areas to be protected and opportunities to improve the risk of flooding in the area.
- Consideration should also be given to including reference to climate change factors within any FRA as part of an approach to promote sustainable flood management.
- Mitigation may be able to address the issue of groundwater flooding, but the information is not currently available to enable SEPA to make an informed comment.
- Any proposed mitigation to groundwater flooding e.g. permanent dewatering, should consider the consequences of a failure e.g. mechanical failure of pumps, resulting response time of groundwater levels rebounding and emergency procedures.
- There may already be a flood risk issue downstream of the Blindwells New Settlement site due to the current management of groundwater. Any additional runoff from the site must not therefore increase the risk of flooding off site downstream.
- The existing pond on the site is not part of the mine water treatment and is manmade. A single SUDs pond may not suffice in terms of treatment and attenuation. It should be part of a surface water management train. In order to use the existing pond for Suds, further assessment will need to be undertaken to ensure that it has the capacity to receive the surface runoff from the site and provide the necessary attenuation and treatment, taking account of climate change.
- Any SUDs would need to be separate from the mine water treatment scheme. The mine water treatment scheme to improve the water quality will have specific capacity and treatment requirements. We would recommend that separate systems are required for SUDS.
- The SUDs proposal would require the impact of the development to be neutral by providing attenuation of runoff from developed areas to that of the pre development level. This is particularly important considering the reported existing situation of groundwater discharge to the Seaton Burn.
- The watercourse on site may have been diverted or altered by the open cast workings. Any development could provide the opportunities for the restoration of watercourses to provide mitigation for flooding, as well as habitat creation.
- All development should be free from fluvial flooding in a 1 in 200 year event. Essential Civil Infrastructure and sensitive development e.g. schools should be free from the 1 in 1000 year fluvial flood event.
- Small watercourse on the site will have an associated 1 in 200 year fluvial flood envelope and development should be avoided in these areas.

The Draft Development Framework indicates in Section 10 a summary of expectations for the masterplan outputs. We recommend that the masterplan be required to avoid or provide adequate mitigation in any areas where flood risk is identified.

	<p>Consideration should be given to locating footpaths and roads alongside watercourses which provides an amenity for local residents. It also provides access for flood prevention authorities to access the watercourses to inspect and undertake essential maintenance. It will also provide the space, if necessary, to erect flood alleviation measures in the event that climate change impacts turn out to be more severe than currently expected.</p>
<p>ACCEPT / NOTED / REJECT</p>	<p>Accept</p>
<p>REASON</p>	<p>As suggested in the consultation process, the PPS effects on soil and waste have been amended to neutral in the SEA ER, and potentially negative on air quality, the water environment and flood risk. However, with regard to flood risk and the water environment the PPS itself has been improved by further references to and clarification on the context for and requirements of the Flood Risk and Drainage Impact Assessments, including reference to the need to factor the effects of climate change in these studies. References to enhancement of the water environment have also been made, including where these benefits can be integrated with other measures aimed at improving biodiversity and habitat value.</p> <p>With respect to air quality, the framework requires this to be assessed and an air quality assessment will be included as part of the required EIA ES. The EIA ES will assess the impacts of traffic associated with the development on Local Air Quality Management Objectives PM10 and NO2. It will include impacts from current and proposed development in the area. Air quality monitoring will be carried out and air quality assessments will address junctions and routes already congested and some distance from the site. Known areas where air quality is poor include Tranent High Street and North High Street, Musselburgh. Related to air quality considerations, the PPS contains references to ensuring that due weight is given to encouraging an appropriate modal hierarchy in walking, cycling, and public transport then private car. While it is accepted that the introduction of any development may impact on air quality consequent on travel demand and associated emissions, the effects of this, within the site particularly, can be minimised through the masterplan design and its proposed dispensation of land uses and access arrangements.</p> <p>For the remainder, the PPS clearly seeks to facilitate the opportunity for appropriate travel choices to be made. However, it is considered that greater emphasis could be given in the PPS to promoting / encouraging appropriate access opportunities, travel patterns and modes within the new settlement with particular regard to the proximity of new housing in relation to the other land uses required and promoted. For example, the proximity of and access from housing to the community and commercial services in the local centre as well as to the employment and open space / recreation opportunities will have a bearing on the appeal of walking and cycling as travel options. Encouraging such travel modes will help minimise the impact on air quality generated by travel demand and associated emissions. To this end a guide to an appropriate walking / cycling catchment shall be introduced to the PPS, with a view to helping inform the location of the new local centre and the core community facilities / amenities to be contained therein, relative to the majority of new housing proposed. Similar principles on access are contained within the local plan with regard to types of open space, and these shall be reiterated within the PPS too. This will help encourage local access by sustainable modes of transport, minimise air quality impacts and reduce associated emissions within the new community, as well as ensure equal access opportunities for all equalities groups.</p>

PROPOSED MODIFICATION	<p><u>Amendments to the Environmental Report</u> The PPS effects on soil and waste have been amended to neutral in the SEA ER, and potentially negative on air quality, the water environment and flood risk.</p> <p><u>Amendments to the PPS/Development Framework</u> On Flooding, Water and Drainage in respect of the Development Framework see response to submission number 11.</p> <p>On air quality impacts, at paragraph 7.63 insert the following text after the second sentence:</p> <p>"Paragraphs 11.27 – 11.36 and policies C1 and C2 of the local plan contains guidance and standards on the provision of open space both in terms of type and amount relative to number of houses and in terms of the proximity of play areas to dwellings; the masterplan shall demonstrate how it has taken cognisance of these parameters."</p> <p>Paragraph 7.94 insert the following text as a new paragraph to this sub-section:</p> <p>" Travel demand and associated emissions can be minimised through the masterplan design and its proposed dispensation of land uses and access arrangements. The location of the new local centre within the new settlement will have a significant bearing on encouraging an appropriate modal hierarchy in walking, cycling and public transport, particularly for short trips. Appendix 3 provides a guide to an appropriate walking / cycling catchment for the new local centre and the core community facilities / amenities to be contained therein, to help inform its location within the site, relative to the majority of new housing proposed. The masterplan shall demonstrate how it has taken cognisance of these parameters. An appropriately located local centre will encourage local access by appropriate modes of transport, while minimising air quality impacts and associated emissions as well as ensure equal access opportunities for all equalities groups, with additional benefits also derived in terms of physical activity and health."</p> <p>Add new Appendix 3 to the Development Framework showing 400m and 800m walking / cycle catchments and possible location of the new local centre.</p>
------------------------------	---

SUBMISSION NUMBER	24
TITLE	MS
INITIAL	J
SURNAME	Winning
ORGANISATION IF APPLICABLE	SNH - Operations Manager (SEA Response)
SUMMARY OF COMMENT	Overall, SNH consider the Environmental Report understates the environmental sensitivities and potential of the development site. In Table 5.1 Environmental Baseline Information within the Biodiversity, Flora and Fauna topic the site is described as having

	<p>'no specific biodiversity designations or features of interest'. SNH consider that this undervalues the site in terms of the habitats and species found on it as detailed in the SEA Scoping Report, Section 4 Biodiversity, Flora and Fauna. Paragraph 4.2.9 of the Scoping Report lists the habitats present on the site that are included within the East Lothian Biodiversity Action Plan (ELBAP).</p> <p>Several ELBAP species were also recorded within the study area covered by the Scoping Report, including barn owl (also protected under Schedule 1 of the Wildlife and Countryside Act, 1981). Of particular importance are the three bird species found to occur on site that are also qualifying species of the Firth of Forth Special Protection Area (SPA). We understand that an Appropriate Assessment is being carried out by the East Lothian Council Biodiversity Officer at the time of writing this letter. As the assessment is not yet available for comment, we have nothing further to add at this stage regarding potential impacts on the Firth of Forth SPA. There is little emphasis or detail on the potential to increase the biodiversity on the site in the Environmental Report. We do not support the conclusion in Appendix 2 that each of the three options will produce the same biodiversity gain.</p> <p>There is little guidance in the Environmental Report to show how biodiversity can be maximised through linking the landscape framework with parks and open space. However, we note and support the recommendation in Appendix 3 for additional text within the Development Framework on connecting habitats to form a coherent network. We recommend that further emphasis on habitat connectivity is incorporated throughout the Environmental Report.</p> <p>Section 9 of the Environmental Report considers the three development options. We note that these diagrams are purposefully illustrative to leave room for interpretation. However, there is no representation in any of the option illustrations of the landscape framework and woodland/open space linkages envisaged in the Development Framework. We feel that this omission could be misleading and recommend that the illustrations are redrawn to take into account the landscape framework and green networks, which are key components of the Development Framework.</p>
ACCEPT / NOTED / REJECT	Accept in part
REASON	<p>It is considered that paragraphs 7.121 – 7.127 and 8.2 – 8.12 and Appendix 2 of the PPS in the main address the concerns raised with respect to the integration of biodiversity and habitat provision within the PPS and that these paragraphs establish suitable principles and direction for the subsequent masterplan that must conform with the PPS. However, during the consultation process suggestions were made with respect to reinstating watercourses, including the biodiversity and habitat benefits that could be derived from this, and related amendments to the PPS have been made.</p> <p>An Appropriate Assessment has also been carried out and it has demonstrated that the integrity of the nearby Firth of Forth SPA will not be harmed.</p> <p>The comments on the illustrative options are noted, but it is considered that this principle is adequately addressed in the PPS itself, particularly at Appendix 2, and no change is made to the SEA ER. It should be noted that the SEA ER describes these as illustrative options, and confirms that the masterplan will fully assess options and demonstrate that the best feasible</p>

	environmental option for site development will be promoted by the preferred masterplan option (PPS paragraphs 1.2 and 7.160 – 7.161). Additionally, it should be noted that paragraph 7.160 – 7.161 of the PPS specifically requires the assessment of different layout options through the master planning process, including where development would interface with natural assets. This is to ensure that the applicant can demonstrate that their preferred masterplan solution offers the best feasible option for site development.
PROPOSED MODIFICATION	See response to submission number 12 of the PPS/development framework comments.
SUBMISSION NUMBER	25
TITLE	Ms
INITIAL	H
SURNAME	Garrow
ORGANISATION IF APPLICABLE	Historic Scotland - Senior Development Assessment Officer - (SEA Response)
SUMMARY OF COMMENT	There have been recent changes to the policy context for the historic environment in that SPP23 has been superseded by SPP and SHEP, which now also includes policies on battlefields. It is not clear if a full context review of the documents listed in table 4.1 has been carried out. It is welcomed that the key message on preserving and where appropriate enhancing the historic environment has been included. It is likely that positive effects will be generated by the PPS's provisions for further interpretation and enhancement of the historical assets at and around the site, and it is not necessary to indicate the views to such assets that ought to be safeguarded at this stage, and it is appropriate to leave this to the master planning stage. It is likely that the effects of these provisions will be long term and not short term as indicated by the SEA ER.
ACCEPT / NOTED / REJECT	Accept
REASON	There is no need to make any amendments to the PPS, although the duration of the positive impact in the SEA ER has been amended from short term to long term, a new appendix provides the context review of the relevant PPS's (this was contained within the SEA scoping document), the reference to SPP and SHEP has been added. The context still contains the new superseded SPP's as information.
PROPOSED MODIFICATION	None

12.3 Summary

APPENDIX 1: Vision Assessment

SEA objectives and sub objectives	Assessment of the vision
<p>1) Promote the sustainable use of on site and off site land resources</p> <ul style="list-style-type: none"> • Ensure that the Development Framework will not exacerbate existing ground conditions • Promote the reduction of waste and the sustainable management of waste • Avoid adverse effects on areas with high quality soils 	<p>0</p> <p>The principle of development at the Blindwells site is an assumption of the Development Framework and is not therefore required to be covered within the frameworks objectives.</p> <p>In order for the settlement to be developed in a sustainable manner, the construction of the site should adhere to sustainable construction principles such as those contained in the <i>UK strategy for more sustainable construction, Building a Better Quality of Life</i>. Whilst this could be covered within the content of the Development Framework it is not considered that a requirement for a specific objective on construction is required.</p> <p>Soil impact Assessment is now required</p>
<p>2) Protect and enhance the natural environment</p> <ul style="list-style-type: none"> • Ensure internationally designated sites such as the Firth of Forth SPA/Ramsar are protected as required by European legislation • Avoid adversely impacting on the condition of East Lothian's SSSI • Where possible enhance biodiversity at the Blindwells site 	<p>+</p> <p>The Development Framework vision promotes high quality design whilst ensuring it preserves the natural and historic environment, and advises and EIA will be required in respect of future development.</p>
<p>3) Maintain and enhance the water quality and ecological status of the local waterways and coastal areas</p> <ul style="list-style-type: none"> • Seek to achieve good ecological status of waterways • Encourage water use efficiency 	<p>+</p> <p>There are no specific references to water within the Development Frameworks vision. However whilst the environmental quality mentioned within the vision is not defined we have assumed that this will cover the environmental limits of water quality.</p>

<ul style="list-style-type: none"> • Prevent impacts from point source and diffuse pollution • Ensure that development does not place an undue burden on existing water and waste water facilities 	<p>Water quality issues are linked to human health and the status of the Firth of Forth SPA therefore it is important that this issue is given consideration.</p> <p>The vision promotes a sustainable community thus it is important that water resources are managed efficiently for this to be a result.</p>
<p>4) Encourage an integrated approach to the reduction of flood risk</p> <ul style="list-style-type: none"> • Avoid development in locations at risk from flooding and mitigate residual flood risk through appropriate measures • Promote and incorporate SUDS in compliance with regulations • Take account of future climate change in terms of managing flood risk 	<p>+</p> <p>The Development Frameworks vision and objectives do not contain any specific reference to reducing flood risk. Whilst the Scoping Identified this as an important issue for the future flood risk at the site is low and therefore it is felt that there is no need for a flood risk specific objective. A flood risk and drainage Impact assessment has also been stated as a requirement of any future planning application.</p> <p>However, the development framework should include consideration of future climatic effects which would cover flood issues (see assessment against SA Objective 6)</p> <p>It is therefore uncertain how the Development Framework vision will impact on this SEA objective.</p>
<p>5) Avoid increasing emission of air pollutants and impacting the health of the population and natural environment</p> <ul style="list-style-type: none"> • Ensure that new land uses do not adversely contribute to the emission of pollutants • Minimise the need to travel and avoid measures that may increase congestion 	<p>I</p> <p>The vision of the plan promotes sustainable modes of transport. It is felt that by promoting such modes of transport provides the best measures to limit the effects of increasing air pollution from traffic. To this end the framework also states an air quality assessment will be required as part of the EIA of the masterplan.</p>
<p>6) Reduce greenhouse gas emissions and promote adaptation for future climate change</p> <ul style="list-style-type: none"> • Minimise demand for raw materials 	<p>I</p> <p>The Development Framework vision promotes the use of renewable sources of energy. This is obviously a positive for the reduction of GHG emissions. Additionally the vision seeks to create a place where travel</p>

<ul style="list-style-type: none"> • Seek to reduce the consumption of electricity and gas • Increase the use of renewable energy technology • Minimise the need to travel by motorised vehicles 	<p>priorities are sustainable. Again reducing emissions. Meeting the requirements of SPP6 is also mentioned within a framework as an extension of this principle of the vision.</p> <p>However, the vision does not specifically mention the promotion of sustainable buildings and the need for the construction of a development that will adapt to future climatic effects. The Development Framework can help to promote such development through promoting environmental assessment such as BREEAM.</p>
<p>7) Protect and enhance the historic environment and landscape</p> <ul style="list-style-type: none"> • Protect and enhance statutory and locally designated features of importance, including archaeology • Protect and enhance the historic and valued landscape character • Seek to integrate valued views of landscape features when planning for future development • Promote high quality and considerate design 	<p>+</p> <p>The vision of the development framework doesn't specifically mention landscape capacity, however it does seek to ensure environmental quality is achieved, and the content of the framework is more specific and highlights its importance. The vision also indicates that the heritage assets and natural assets of the surrounding the area should also be taken into account. The vision can be considered to support the SEA objectives.</p>
<p>8) To improve the health and well-being of the population and reduce inequalities in health</p> <ul style="list-style-type: none"> • Promote healthy and active lifestyles through encouraging walking and cycling as well as the provision of sporting, recreation and community facilities • Promote access to multi functional open space • Reduce crime and the fear of crime, including through 'designing out of crime' • Promote accessibility to healthcare services 	<p>+</p> <p>The vision promote the improvement of health and well-being of the population through the creation of community identity, supports sustainable transport, supporting of local amenities and environmental quality.</p> <p>The Blindwells development provides an ideal opportunity to improve the health and well being of the existing local population of neighbouring settlements as well as the future Blindwells residents, through providing additional recreational and leisure opportunities, and by improving the quality of the local environmental.</p> <p>The vision in general conform to this SEA objective. However the Development Framework could benefit through referring to the provision</p>

of safer spaces. This could perhaps be worked into the content of the report ie. The detailed design of the development should take into account guidance such as '*Secured by Design*' and '*Safer Places*' in order to design out crime.

Summary (key issues arising; potential mitigation measures; sources of uncertainty; assumptions in making the assessment; important impact dimensions, e.g. cumulative, secondary etc)

The vision for the Blindwells Development Framework can be considered in general to promote a plan that will be considerate of environmental effects. However there are opportunities to further imbed required environmental considerations into the Development Framework by minor alterations to the Development Framework.

The potential influence of climatic changes will be a serious consideration for the long term sustainability of any development at Blindwells. In order to ensure that climate change adaptation and mitigation are at the heart Development Framework it is considered beneficial that a specific reference is added.

APPENDIX 2: Assessment of Blindwells Development Framework Options

SEA objectives and sub objectives	Option 1	Option 2	Option 3
<p>1) Promote the sustainable use of on site and off site land resources</p> <ul style="list-style-type: none"> • Ensure that the Development Framework will not exacerbate existing ground conditions • Promote the reduction of waste and the sustainable management of waste • Avoid adverse effects on areas with high quality soils 	<p>0</p> <p>The option would provide the most accessibility for local residents as the core mixed use area would be located in the middle of site.</p> <p>The location of employment land adjacent to the A1 on the southern end of the boundary would provide residents with a 'noise buffer' from this busy road corridor.</p>	<p>0</p> <p>The option would result in non residential land uses being clustered together at eastern side of the site leading to a concentration of services.</p> <p>The main core area is accessible by foot from Winton Loan on the eastern perimeter of the site, which would benefit visitors from surrounding settlements (Cockenzie and Port Seton)</p> <p>The location of residential land adjacent to the A1 on the southern end of the boundary could mean that some residents are more exposed to noise pollution emanating from this busy road corridor.</p>	<p>0</p> <p>The option would provide a main core area with additional two sub core areas, which would contribute towards an equal distribution to services across the site.</p> <p>The main core area is accessible from the site entrance, which would benefit visitors from surrounding settlements (Tranent and Prestonpans).</p> <p>This option does however place residential development closer to the A1 than the other options.</p>
<p>2) Protect and enhance the natural environment</p> <ul style="list-style-type: none"> • Ensure internationally designated sites such as the Firth of Forth SPA/Ramsar are protected 	<p>1</p> <p>The option would see the loss of most of the existing habitat on the site which consists mainly of semi improved grassland. The quality of habitat is however considered</p>	<p>1</p> <p>The option would see the loss of most of the existing habitat on the site which consists mainly of semi improved grassland. The quality of habitat is however considered</p>	<p>1</p> <p>The option would see the loss of most of the existing habitat on the site which consists mainly of semi improved grassland. The quality of habitat is however considered</p>

<p>as required by European legislation</p> <ul style="list-style-type: none"> • Avoid adversely impacting on the condition of East Lothian's SSSI • Where possible enhance biodiversity at the Blindwells site 	<p>to be low.</p> <p>The nearest biodiversity designation of European significance is the Firth of Forth SPA located approximately 1 km to the north of the site. At this stage it is uncertain of the effects on the site. This will be determined through the appropriate assessment.</p> <p>The option is likely to provide open spaces and areas of tree planting especially on the periphery of the site as well as utilising existing water features which should benefit wildlife.</p>	<p>to be low.</p> <p>The nearest biodiversity designation of European significance is the Firth of Forth SPA located approximately 1 km to the north of the site. At this stage it is uncertain of the effects on the site. This will be determined through the appropriate assessment.</p> <p>The option is likely to provide open spaces and areas of tree planting especially on the periphery of the site as well as utilising existing water features which should benefit wildlife.</p>	<p>to be low.</p> <p>The nearest biodiversity designation of European significance is the Firth of Forth SPA located approximately 1 km to the north of the site. At this stage it is uncertain of the effects on the site. This will be determined through the appropriate assessment.</p> <p>The option is likely to provide open spaces and areas of tree planting especially on the periphery of the site as well as utilising existing water features which should benefit wildlife.</p>
<p>3) Maintain and enhance the water quality and ecological status of the local waterways and coastal areas</p> <ul style="list-style-type: none"> • Seek to achieve good ecological status of waterways • Encourage water use efficiency • Prevent impacts from point source and diffuse pollution • Ensure that development does not place an undue burden on 	<p>I</p> <p>The option includes a SUDS pond which can help to maintain existing watercourses.</p>	<p>I</p> <p>The option includes a SUDS pond which can help to maintain existing watercourses.</p>	<p>I</p> <p>The option includes a SUDS pond which can help to maintain existing watercourses.</p>

<p>existing water and waste water facilities</p>			
<p>4) Encourage an integrated approach to the reduction of flood risk</p> <ul style="list-style-type: none"> • Avoid development in locations at risk from flooding and mitigate residual flood risk through appropriate measures • Promote and incorporate SUDS in compliance with regulations • Take account of future climate change in terms of managing flood risk 	<p>I</p> <p>The development of the Blindwells site would utilise the north to south decline in the sites topography and the existing lagoons which would become a SUDS feature at the northern boundary. The area around the SUDS pond would consist of service landscaping and open space. These measures would offset the risk of flooding on site.</p> <p>It should be noted that SEPA have raised concerns over flood risk due to existing problems outwith the site. The developer will require to identify that the development will not cause further impacts. This will be a requirement of the masterplan application.</p>	<p>I</p> <p>The development of the Blindwells site would utilise the north to south decline in the sites topography and the existing lagoons which would become a SUDS feature at the northern boundary. The area around the SUDS pond would consist of service landscaping and open space. These measures would offset the risk of flooding on site.</p> <p>It should be noted that SEPA have raised concerns over flood risk due to existing problems outwith the site. The developer will require to identify that the development will not cause further impacts. This will be a requirement of the masterplan application.</p>	<p>I</p> <p>The development of the Blindwells site would utilise the north to south decline in the sites topography and the existing lagoons which would become a SUDS feature at the northern boundary. The area around the SUDS pond would consist of service landscaping and open space. These measures would offset the risk of flooding on site.</p> <p>It should be noted that SEPA have raised concerns over flood risk due to existing problems outwith the site. The developer will require to identify that the development will not cause further impacts. This will be a requirement of the masterplan application.</p>
<p>5) Avoid increasing emission of air pollutants and impacting the health of the population and natural environment</p> <ul style="list-style-type: none"> • Ensure that new land uses do not adversely contribute to the emission of pollutants 	<p>-</p> <p>The option does not include the details of transportation infrastructure. At this stage it is assumed that the option would lead to a net increase in traffic and development that involves an increasing amount of pollution.</p>	<p>--</p> <p>The option does not include the details of transportation infrastructure. At this stage it is assumed that the option would lead to a net increase in traffic and development that involves an increasing amount of pollution.</p>	<p>-</p> <p>The option does not include the details of transportation infrastructure. At this stage it is assumed that the option would lead to a net increase in traffic and development that involves an increasing amount of pollution.</p>

<ul style="list-style-type: none"> Minimise the need to travel and avoid measures that may increase congestion 	<p>The central location of the core area could encourage walking and cycling.</p>	<p>The location of core services towards the eastern end of the site will result in some residential sites being a distance away. This will result in some vehicle traffic across the development</p>	<p>The split core areas could encourage walking and cycling.</p>
<p>6) Reduce greenhouse gas emissions and promote adaptation for future climate change</p> <ul style="list-style-type: none"> Minimise demand for raw materials Seek to reduce the consumption of electricity and gas Increase the use of renewable energy technology Minimise the need to travel by motorised vehicles 	<p>?</p> <p>There is currently insufficient detail to be able to make an assessment at this stage.</p> <p>The option should implement low carbon measures such as those contained with <i>A Low Carbon Building Standards Strategy for Scotland</i>⁹ and Ecohomes¹⁰ and BREEAM.</p>	<p>?</p> <p>There is currently insufficient detail to be able to make an assessment at this stage.</p> <p>The option should implement low carbon measures such as those contained with <i>A Low Carbon Building Standards Strategy for Scotland</i> and Ecohomes and BREEAM.</p>	<p>?</p> <p>There is currently insufficient detail to be able to make an assessment at this stage.</p> <p>The option should implement low carbon measures such as those contained with <i>A Low Carbon Building Standards Strategy for Scotland</i> and Ecohomes and BREEAM.</p>
<p>7) Protect and enhance the historic environment and landscape</p> <ul style="list-style-type: none"> Protect and enhance statutory and locally designated features of importance, including archaeology 	<p> </p> <p>The option implies a traditional town layout with core area and central open space providing the focal point of the development with residential, employment and educational amenities located on the periphery.</p>	<p> </p> <p>The option implies by the location of core mixed use area land use on the eastern perimeter that any future eastwards expansion would be based around core mixed use area land use.</p>	<p> </p> <p>The option implies by the location of educational land use on the eastern perimeter that any future eastwards expansion would be based around educational land use.</p>

⁹ Also referred to as Sullivan Report – Scottish Ministers still to formally approve recommendations for new Building Standards

¹⁰ Ecohomes still valid in Scotland until formal adoption of new Building Standards

<ul style="list-style-type: none"> • Protect and enhance the historic and valued landscape character • Seek to integrate valued views of landscape features when planning for future development • Promote high quality and considerate design 	<p>The historic route used by Jacobean soldiers prior to the Battle of Prestonpans (1745) could be incorporated into the street/footpath design.</p>	<p>The historic route used by Jacobean soldiers prior to the Battle of Prestonpans (1745) could be incorporated into the street/footpath design.</p>	<p>The historic route used by Jacobean soldiers prior to the Battle of Prestonpans (1745) could be incorporated into the street/footpath design.</p>
<p>8) To improve the health and well-being of the population and reduce inequalities in health</p> <ul style="list-style-type: none"> • Promote healthy and active lifestyles through encouraging walking and cycling as well as the provision of sporting, recreation and community facilities • Promote access to multi functional open space • Reduce crime and the fear of crime, including through 'designing out of crime' • Promote accessibility to healthcare services 	<p>++</p> <p>The option would provide educational, recreational and open space facilities. This should potentially benefit the health and well being of the future Blindwells population as well as those from surrounding settlements.</p>	<p>++</p> <p>The option would provide educational, recreational and open space facilities. This should potentially benefit the health and well being of the future Blindwells population as well as those from surrounding settlements.</p>	<p>++</p> <p>The option would provide educational, recreational and open space facilities. This should potentially benefit the health and well being of the future Blindwells population as well as those from surrounding settlements.</p>

Summary (most sustainable option; key issues arising; potential mitigation measures; sources of uncertainty; assumptions in making the assessment; important impact dimensions, e.g. cumulative, secondary etc)

The three options provide different schematic outlines of how the various land uses (Mixed Use, Residential, Commercial, Employment, and Open Space) could be transposed on the Blindwells site. The performance of each option can be seen to be broadly similar in their performance against the SEA objectives.

Option 1 – traditional town layout with centralised town centre proving settlement focal point. Employment area providing buffer between A1 and residential area. Access to core area from site entrance potentially bypassing residential area. Opportunities for eastwards expansion. Links with surrounding countryside to east of site. The location of the central core area and open space is considered to enable greater access to services and to encourage walking and cycling.

Option 2 – Non residential land uses clustered together at eastern section suggesting future town centre after future eastwards expansion of site. Good central access for pupils/students. Some residents exposed to noise from A1. Access to core area and employment land through residential area which is undesirable in terms of amenity of local environment and safety. Opportunities for eastwards expansion. Links with surrounding countryside to east of site. This option is considered to be the least beneficial as part of the residential uses on site will be some distance from services and employment site increasing the likelihood of higher levels of traffic and pollution on site.

Option 3 – Main core development area highly accessible from site entrance. Sub core area provides increased access to services for residents. Recreational and play areas link well with Winton Loan footpath which links with neighbouring settlements. Employment area providing buffer between A1 and residential area. Opportunities for eastwards expansion.

At this stage, without the full extent of technical studies, it is not possible to firm up an agreed option and given they offer the same land uses and a final solution will be tested by the masterplan, which will describe and illustrate the best feasible environmental option for site development. Many of the issues identified can be turned into opportunities through appropriate design solutions. At this stage the options are not detailed and this allows for flexibility as the constraints and issues with the site are understood in more depth. The Development Framework and masterplan will address matters in more detail having regard to up to date information, and use the options to assist in the process.

APPENDIX 3: Assessment of Blindwells Development Framework

SEA Framework Objective	Significance of Effect	Temporal Effects (S / M / L)	Cumulative Effects (Yes / No)	Commentary (including mitigation proposals, assumptions, limitations etc.)
<p>1) Promote the sustainable use of on site and off site land resources</p> <ul style="list-style-type: none"> Ensure that the Development Framework will not exacerbate existing ground conditions Promote the reduction of waste and the sustainable management of waste Avoid adverse effects on areas with high quality soils 	0	Long Term	Yes – Whilst the Development Framework encourages sustainability on site increased development in this location will increase the amount of urban form in the locality. The cumulative effect may be to place pressure on surrounding space for development in itself.	<p>At a minimum the development would comply with standards contained in Policy DP23 of East Lothian Local Plan and would meet the requirements of the Lothian and Borders Waste Plan.</p> <p>The Development Framework advocates the reduction, re-use and recycling of construction materials.</p> <p>The subject of waste is given due consideration with the provision of waste separation and recycling facilities. Design consideration is required in order to accommodate household waste collection vehicles and suitable waste storage area for individual buildings.</p> <p>The brief also proposes several design and layout measures (such as permeability of the site and sensitive arrangement of buildings) that should help to promote a sustainable development that will wear well into the future.</p>
<p>2) Protect and enhance the natural environment</p> <ul style="list-style-type: none"> Ensure internationally designated sites such as 	+	Long Term	Yes – The development of the site has the potential to impact on the Firth of Forth SPA alongside existing development. The Appropriate Assessment will	<p>Section 7.121 of the Development Framework actively seeks the enhancement of habitat. Reference is also made to the creation of grassland, meadow, and woodland areas.</p>

SEA Framework Objective	Significance of Effect	Temporal Effects (S / M / L)	Cumulative Effects (Yes / No)	Commentary (including mitigation proposals, assumptions, limitations etc.)
<p>the Firth of Forth SPA/Ramsar are protected as required by European legislation</p> <ul style="list-style-type: none"> • Avoid adversely impacting on the condition of East Lothian's SSSI • Where possible enhance biodiversity at the Blindwells site 			<p>identify the potential level of adverse effects.</p>	<p>Recommendation: Habitat creation and enhancement can be successful but only when viewed holistically. Small patches of disjointed habitats that do not function as a network within the site and with existing off site features can be unsuccessful at improving biodiversity value. The Development Framework would benefit from additional text stating habitats should form a coherent network.</p>
<p>3) Maintain and enhance the water quality and ecological status of the local waterways and coastal areas</p> <ul style="list-style-type: none"> • Seek to achieve good ecological status of waterways • Encourage water use efficiency • Prevent impacts from point source and diffuse pollution • Ensure that development does not 	I	Long Term	<p>Yes – The abstraction, use and disposal of water at Blindwells will put additional pressure demands on water resources and infrastructure in the wider surrounding area. However, the scoping of this SEA did not indicate water resource issues</p>	<p>In Section 7.143 the Development Framework indicates the use of Sustainable Urban Drainage Systems (SUDs). The enhancement of the habitat adjacent to the Seton Burn should also contribute towards improved water quality. Watercourses will be incorporated into the development and will not be culverted in line with SPP 14.</p> <p>The Development Framework sets out a requirement for the Masterplan to include a phasing plan for delivery of on and off site infrastructure. This will incorporate as consideration for foul water capacity for industrial and commercial uses as requested by SEPA in consultation on the scope of this SEA.</p>

SEA Framework Objective	Significance of Effect	Temporal Effects (S / M / L)	Cumulative Effects (Yes / No)	Commentary (including mitigation proposals, assumptions, limitations etc.)
place an undue burden on existing water and waste water facilities				<p>Recommendation: The Development Framework could benefit from referring to potential sources of water supply (i.e. potential of on site groundwater supply, Grey water recycling etc), and the need to minimise and use water efficiently.</p> <p>Mitigation measures to prevent pollution to water features should be fully developed in the EIA and site EMP in compliance with SEPA. The SUDs system can play a role in the treatment of surface water runoff from the site.</p>
<p>4) Encourage an integrated approach to the reduction of flood risk</p> <ul style="list-style-type: none"> • Avoid development in locations at risk from flooding and mitigate residual flood risk through appropriate measures • Promote and incorporate SUDS in compliance with regulations • Take account of future climate change in terms of managing flood 	I	Long Term	Yes – Flood Prevention measures implemented on the Blindwells site could have an impact on flooding downstream from the site – water displacement.	<p>Section 7.142 of the Development Framework acknowledges that a Flood Risk Assessment for the site would require to be undertaken in accordance with Policy H1 of the East Lothian Local Plan. Although SEPA Flood Map indicated no flood risk on the site, water courses at risk of flooding have been identified close to the site.</p> <p>SEPA have indicated that catchments less than 3km² have not been modelled as part of the Indicative Flood Mapping exercise. The potential for flooding of Seton Burn therefore has not been modelled. However it is felt that preference to incorporate SUDS into the adjacent part of the site will mitigate for potential local flooding issues.</p> <p>In line with the comments received from</p>

SEA Framework Objective	Significance of Effect	Temporal Effects (S / M / L)	Cumulative Effects (Yes / No)	Commentary (including mitigation proposals, assumptions, limitations etc.)
risk				<p>SEPA on the scope of the assessment the Development Framework incorporates the requirements for regional surface water drainage systems.</p> <p>It should be noted that SEPA have raised concerns over flood risk due to existing problems outwith the site. The developer will require to identify that the development will not cause further impacts. This will be a requirement of the masterplan application.</p>
<p>5) Avoid increasing emission of air pollutants and impacting the health of the population and natural environment</p> <ul style="list-style-type: none"> • Ensure that new land uses do not adversely contribute to the emission of pollutants • Minimise the need to travel and avoid measures that may increase congestion 	+	Long Term	<p>Yes – Development of the site would lead to a localised increase in car journeys which would have implications on the road network around the Blindwells site. However, linking the site to existing Public Transport networks could result in improving accessibility and availability to these services for existing residents in adjacent communities.</p>	<p>Whilst development of 1600 homes at the Blindwells site will inevitably see an increase in actual emissions from vehicles. However, this assessment is of the content of the planning brief rather than the principle of development at the site. As such the Brief contains a number of measures to promote more sustainable travel and to reduce the potential for vehicle trip making.</p> <p>During consultation on the scope of this SEA SEPA have indicated that the impacts of increasing traffic on the following areas should be considered: Tranent High Street; Church Street (Tranent); St. Joseph’s Cottages; and Musselburgh High Street (main retail</p>

SEA Framework Objective	Significance of Effect	Temporal Effects (S / M / L)	Cumulative Effects (Yes / No)	Commentary (including mitigation proposals, assumptions, limitations etc.)
				<p>centre). At this stage the options for access to the site are not defined thus making it difficult to accurately predict traffic flow and specific impacts on these locations. Such impacts should be considered by traffic appraisal in support of the Masterplan.</p> <p>The brief promotes accessibility interconnection and accessibility through the site. Priorities are to be given to pedestrian and cyclists movement and circulation in internal road layout and connection to outside of the site.</p> <p>The Development Framework also states that no house should be more than 400m walking distance from the nearest bus stop.</p> <p>Furthermore the brief requires a transport assessment to be produced in advance of development at the site.</p> <p>The development design would comply with the 'Home Zone' (non motorised priority over motorised) guidance contained in Design Standards for New Housing Areas.</p>
6) Reduce greenhouse gas emissions and promote adaptation for	I	Long Term	Yes – The Blindwells Development will have implications on the wider	Whilst development of 1600 homes at the Blindwells site will inevitably see an increase in actual emissions of

SEA Framework Objective	Significance of Effect	Temporal Effects (S / M / L)	Cumulative Effects (Yes / No)	Commentary (including mitigation proposals, assumptions, limitations etc.)
<p>future climate change</p> <ul style="list-style-type: none"> • Minimise demand for raw materials • Seek to reduce the consumption of electricity and gas • Increase the use of renewable energy technology • Minimise the need to travel by motorised vehicles 			<p>environment by virtue of increasing the demand for energy generation and materials.</p>	<p>greenhouse gases. However, this assessment is of the content of the planning brief rather than the principle of development at the site.</p> <p>The Development Framework refers to SPP 6: Renewable Energy and the requirement to incorporate on site zero and low carbon equipment leading to a 15% CO2 reduction beyond the 2007 building regulation standard.</p> <p>Alternative forms of energy such as Combined Heat and Power Plant are also cited. The implementation of these measures would contribute to the reduction of the consumption of electricity and gas.</p> <p>The avoidance of overshadowing and orientating buildings to take advantage of solar gain with increases glazing on south facing elevations is encouraged.</p> <p>The development design would comply with the 'Home Zone' (non motorised priority over motorised) guidance contained in Design Standards for New Housing Areas.</p> <p>Recommendation: Whilst the brief does include measures for limiting the potential for flood risk at the site, it is felt that the brief does not specifically</p>

SEA Framework Objective	Significance of Effect	Temporal Effects (S / M / L)	Cumulative Effects (Yes / No)	Commentary (including mitigation proposals, assumptions, limitations etc.)
				<p>reference adaptation as a key component of the design of new buildings. Promoting factors such as orientation and encouraging housing with drying space (as recommended within the Ecohomes guidance) within the design section will help to illustrate that Sustainable Development is promoted at the heart of the Framework and is not a concept to bolt on.</p> <p>Recommendation: The Development Framework makes no reference to Ecohomes 2006 Principles, BREEAM for non residential buildings or the emerging new Scottish Building Standards. Promoting encouragement for building to undergo an environmental assessment methodology such as these will help the final development towards the achievement of the CO₂ reduction targets included in the Development Framework.</p>
<p>7) Protect and enhance the historic environment and landscape</p> <ul style="list-style-type: none"> Protect and enhance statutory and locally designated features of importance, including archaeology 	+	Short term	Yes – The development of the site would be visible in the wider area, and could impact on the setting of other settlements and the surrounding landscape.	Section 7.135 of the Development Framework refers to the site of the Battle of Prestonpans to the north of the Blindwells site and the historic route associated with the battle that runs through the site as a consideration. Reference is made to the Listed Buildings that surround the site although no reference is made to how these receptors will be protected or enhanced by the Blindwells Development.

SEA Framework Objective	Significance of Effect	Temporal Effects (S / M / L)	Cumulative Effects (Yes / No)	Commentary (including mitigation proposals, assumptions, limitations etc.)
<ul style="list-style-type: none"> • Protect and enhance the historic and valued landscape character • Seek to integrate valued views of landscape features when planning for future development • Promote high quality and considerate design 				<p>The Development Framework provides examples of good design principles that could be utilised on site to help create a high quality on site townscape.</p> <p>Recommendation: Further advice should be included on the protection of some of the valued views on the site (e.g. to the Firth of Forth and Arthurs seat)</p>
<p>8) To improve the health and well-being of the population and reduce inequalities in health</p> <ul style="list-style-type: none"> • Promote healthy and active lifestyles through encouraging walking and cycling as well as the provision of sporting, recreation and community facilities • Promote access to multi functional open space • Reduce crime and the fear of crime, including through 	++	Medium Term	Yes – The development of community, open space and recreational facilities should compliment and serve those from surrounding settlements.	<p>The health of the population can be impacted upon by the Development Framework in a number of ways.</p> <p>In general the provision of high quality and affordable housing will assist in improving general health inequalities (set out in section 7.100-108) for those in lower wage brackets.</p> <p>Section 7.15-7.18 promotes the creation of a formalised path network to allow pedestrian and cyclist movement between the various land uses and which will also integrate with the Winton Loan Public Right of Way to the east of the site. This will assist in promoting healthy exercise.</p> <p>The Development Framework promotes the requirement for community sports</p>

SEA Framework Objective	Significance of Effect	Temporal Effects (S / M / L)	Cumulative Effects (Yes / No)	Commentary (including mitigation proposals, assumptions, limitations etc.)
<p>'designing out of crime'</p> <ul style="list-style-type: none"> Promote accessibility to healthcare services 				<p>pitches, GP surgery and recreational and open space. Reference is made to providing a variety of equipped play facilities for different age groups. This again will promote improved health.</p> <p>The Development Framework benefits from referring to PAN 77 Designing Safer Places which advocates using good design solutions to 'design out crime'.</p>

Appendix 4: Summary of Policy Context Review

Table A2: Context review results

Plan Programme Strategy (PPS)	PSS Objectives	Impact of PPS/ Implications for Development Framework
International		
Directive 79/409/EC; The Conservation of Wild Birds 1979	Requires Member States to sustain populations of naturally occurring wild birds by sustaining areas of habitats to maintain ecologically and scientifically sound levels.	Development at Blindwells may have potential impacts on bird population and at Firth of Forth SPA resulting from pollution discharges to watercourses, etc. The Development Framework must ensure that any such impacts will be addressed through the EIA process.
Directive 92/42EC; The Conservation of Natural Habitats of Wild Fauna and Flora 1992	Requires Member States to sustain populations of naturally occurring flora and fauna by sustaining areas of habitats to maintain ecologically and scientifically sound levels.	Development at Blindwells may have potential impacts on bird population and at Firth of Forth SPA resulting from pollution discharges to watercourses etc. The Development Framework must ensure that any such impacts will be addressed through the SEA, AA and EIA processes.
Directive 2000/60/EC; The Water Framework Directive	<p>Directive 2000/60/EC <i>establishing a framework for the Community action in the field of water policy</i> - the 'Water Framework Directive' (WFD) - came into force in December 2000 and EU Member States were required to transpose the Directive into domestic law by December 2003. The WFD provides a framework for the protection, improvement and sustainable use of water across Europe.</p> <p>The main objectives of the WFD are to:</p> <ul style="list-style-type: none"> • enhance the status and prevent further deterioration of aquatic ecosystems and associated wetlands – there is a requirement for nearly all inland and coastal waters to achieve 'good status' by 2015; • promote the sustainable use of water; • reduce pollution of water, especially by 'priority' and 'priority hazardous' substances; • lessen the effects of floods and droughts; and • rationalise and update existing legislation and introduce a co-ordinated approach to water management based on the concept of river basin planning. 	The Blindwells development could have the potential to impact upon local water features. The Development Framework offers opportunities to manage local water resources, and alleviate or offset flooding through the use of SUDS, permeable surfaces, flood defences, etc.
Directive 1966/62/EC; Ambient Air Quality and	Establishes standards for air quality and sets limits for	Development has the potential to increase traffic

Management	various pollutants.	resulting in an increase in localised air pollutants. The Development Framework must ensure that any such impacts will be addressed through the EIA process.
National		
Enjoy the Outdoors – An SNH Policy Framework	Sets out the policy for Scotland with regard to the enjoyment of natural heritage and outdoor recreation. SNH's remit means that it has a keen interest in all recreational and educational activities that are closely dependent on, or draw inspiration from, the natural environment, are practiced informally and mainly on a non-competitive basis and which are freely available to and undertaken by the public. SNH also has an interest in activities that make use of the natural environment.	The Development Framework will consider the opportunity to provide new natural heritage and outdoor recreational facilities. There is potential to improve access for the local population to open spaces.
Scottish Outdoor Access Code – Approved Code 2004	Paper analyses issues of access. The local authorities can formally exempt land from access rights for short periods. Local authorities and some other public bodies can introduce bylaws.	A core path is identified within the Blindwells site. The development of Blindwells is likely to increase local access through the provision of new roads and footpaths
Sport 21 2003-02007 The national Strategy for Sport – Shaping Scotland's Future	The paper contains the values and strategies for sport in Scotland. This covers outdoor recreational activities. The paper refers to work of the Scottish Natural Heritage (SNH) which also affects Scottish Sport. Its vital role in sustaining the quality of Scotland's countryside maintains the setting for much outdoor sport and physical recreation. The Land Reform (Scotland) Act 2003 and the accompanying Scottish Outdoor Access Code will particularly improve recreational opportunities for residents and visitors alike.	The Blindwells Development Framework will offer opportunity to implement additional recreational and leisure facilities.
Disability Discrimination Act 2005	This document sets out the laws that need to be adhered to in with regard to disabled access.	The Development Framework must acknowledge that new development will have to provide for the needs of disabled persons especially with regard to access.
Scotland's National Transport Strategy	Promote economic growth by building, enhancing managing and maintaining transport services, infrastructure and networks to maximise their efficiency; <ul style="list-style-type: none"> • Promote social inclusion by connecting remote and disadvantaged communities and increasing the accessibility of the transport network; • Protect our environment and improve health by building and investing in public transport and other types of efficient and sustainable transport which minimise emissions and consumption of resources and energy; 	The Blindwells Development Framework provides an opportunity to provide for new transport infrastructure. Opportunity to improve local public transport provision. Likely to be increases in localised traffic levels as a result of the development. The Development Framework must ensure that any such impacts will be addressed by means of a Transport Assessment.

	<ul style="list-style-type: none"> • Improve safety of journeys by reducing accidents and enhancing the personal safety of pedestrians, drivers, passengers and staff: and • Improve integration by making journey planning and ticketing easier and working to ensure smooth connection between different forms of transport. 	
National Waste Strategy 1999	<ol style="list-style-type: none"> 1. Ensuring that waste is recovered or disposed of without endangering human health and without using processes or methods which could harm the environment and, in particular, without - <ol style="list-style-type: none"> (a) risk to water, air, soil, plants or animals (b) causing nuisance through noise or odours; or (c) adversely affecting the countryside or places of special interest. 2. Establishing an integrated and adequate network of waste disposal installations, taking account of the best available technology not involving excessive costs. 3. Ensuring that the network referred to in paragraph 2 above enables - <ol style="list-style-type: none"> (a) the European Community as a whole to become self-sufficient in waste disposal, and the Member States individually to move towards that aim, taking into account geographical circumstances or the need for specialised installations for certain types of waste; and (b) waste to be disposed of in one of the nearest appropriate installations, by means of the most appropriate methods and technologies in order to ensure a high level of protection for the environment and public health. 4. Encouraging the prevention or reduction of waste production and its harmfulness, in particular by - <ol style="list-style-type: none"> (a) the development of clean technologies more sparing in their use of natural resources; (b) the technical development and marketing of products designed so as to make no contribution or to make the smallest possible contribution, by the nature of their manufacture, use or final disposal, to increasing the amount or harmfulness of waste and pollution hazards; (c) the development of appropriate techniques for the final disposal of dangerous substances contained in waste destined for recovery. 	Development at Blindwells will increase local waste generation. The development should have a variety of waste recycling and disposal facilities available in order to achieve targets. Development Framework must address issue of waste disposal.

	5. Encouraging - (a) the recovery of waste by means of recycling, re-use or reclamation or any other process with a view to extracting secondary raw materials; and (b) the use of waste as a source of energy.	
Land Reform (Scotland) Act 2003	Establishes right of responsible access to land and water.	The development will in same ways increase access to and within the Blindwells area through the creation of new roads and footpaths.
Wildlife and Countryside Act 1981	The Wildlife and Countryside Act 1981(WCA 1981) consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and Council Directive 79/409/EEC on the Conservation of Wild Birds (Birds Directive) in Great Britain.	Will be loss of improved grassland habitat although opportunity to create new habitats.
Nature Conservation Bill (Scotland) 2004	The Bill brings forward essential measures to: <ul style="list-style-type: none"> • Conserve and enhance Scotland's unique natural heritage • Create strong action to reduce environmental crime and conserve biodiversity • Reflect the Executive's wider commitments to environmental justice, to rural Scotland and to local communities • Reform the SSSI (Site of Special Scientific Interest) system for Scotland's most special places and natural habitats for vulnerable species • Provide incentives to landowners to protect SSSIs rather than paying compensation for not damaging them with speculative developments • Build upon the delivery of custodial sentences and other measures for wildlife criminals in the Criminal Justice (Scotland) Act 2003 	The Blindwells Development Framework needs to meet the requirements of the legislation.
Climate Change; the UK Programme	Aims to cut the UK's carbon emissions by 60% by 2050. The UK Govt have set a number of strategies and measures to achieve these objectives in six different sectors; energy supply, business, transport, domestic, agriculture, forestry and land management, and public and local government.	The Blindwells Development Framework should consider the inclusion of low carbon and energy efficient measures in order to help meet UK Government target.

Air Quality Strategy for England, Scotland, Wales & NI: Working Together for Clean Air	Set out objectives for 8 main air pollutants to protect health.	Development has the potential to increase traffic resulting in an increase in localised air pollutants. The Development Framework must ensure that any such impacts will be addressed through the EIA/TA process.
UK Biodiversity Action Plan	Identifies UK priority species and habitats where action to conserve is required. There are 1149 priority species and 65 priority habitats.	Will be loss of improved grassland habitat although opportunity exists to create new habitats.
It's in Your Hands - Scottish Biodiversity Strategy	<p>Objectives of the Strategy are:</p> <ul style="list-style-type: none"> • Species & Habitats: To halt the loss of biodiversity and continue to reverse previous losses through targeted action for species and habitats • People: To increase awareness, understanding and enjoyment of biodiversity, and engage many more people in conservation and enhancement • Landscapes & Ecosystems: To restore and enhance biodiversity in all our urban, rural and marine environments through better planning, design and practice • Integration & Co-ordination: To develop an effective management framework that ensures biodiversity is taken into account in all decision making • Knowledge: To ensure that the best new and existing knowledge on biodiversity is available to all policy makers and practitioners. 	There will be a loss in the area of improved grassland at Blindwells. Opportunity exists to create new habitats that address the priorities of the Biodiversity Strategy.
Securing the Future – Delivering UK Sustainable Development Strategy	<p>The previous UK sustainable development strategy - <i>A better quality of life: a strategy for sustainable development for the UK</i> – was published in 1999 and defined sustainable development as the <i>simultaneous</i> achievement of <u>four</u> objectives:</p> <ul style="list-style-type: none"> • social progress which recognises the needs of everyone; • effective protection of the environment; • prudent use of natural resources; and • maintenance of high and stable levels of economic growth and employment. <p>The new UK strategy contains:</p> <ul style="list-style-type: none"> • a new integrated vision building on the 1999 strategy – with stronger international and societal dimensions; • five principles – with a more explicit focus on 	The Blindwells Development Framework should adhere to the objectives of the Sustainable Development Strategy.

	<p>environmental limits;</p> <ul style="list-style-type: none"> • four agreed priorities – sustainable consumption and production, climate change, natural resource protection and sustainable communities; and • a new indicator set, which is more outcome focused, with commitments to look at new indicators such as on wellbeing. 	
<p>Choosing Our Future – Scotland's Sustainable Development Strategy (2005)</p>	<p>Sets the four overriding objectives as the UK Strategy with priorities for Scotland:</p> <ul style="list-style-type: none"> • Sustainable consumption and production: achieving more with less. This includes reducing the inefficient use of resources, looking at the impact of products and materials across their whole lifecycle and encouraging people to think about the social and environmental consequences of their purchasing choices. • Climate change and energy: securing a profound change in the way we generate and use energy, and reducing greenhouse gas emissions. • Natural resource protection and environmental enhancement: protecting our natural resources, building a better understanding of environmental limits, and improving the quality of the environment. • Sustainable communities: creating communities that embody the principles of sustainable development locally. 	<p>The Blindwells Development Framework should seek to address the priorities of the Strategy by promoting sustainable forms of consumption and production, energy efficiency measures, protection and enhance of the natural environment, and creation of a sustainable community.</p>
<p>National Planning Framework 2</p>	<p>The National Planning Framework (NPF) sets out the spatial development strategy for Scotland till 2025. The NPF sets out a vision of Scotland in which other plans and programmes can share and to which they can contribute. The NPF complements the Executive's Framework for Economic Development in Scotland, highlighting the importance of place and identifying priorities for investment in strategic infrastructure to enable each part of the country to play to its strengths in building a Scotland which is competitive, fair and sustainable. It is not intended to be a prescriptive blueprint, but will be a material consideration in framing planning policy and making decisions on planning applications and appeals.</p>	<p>Many of the aims of the NPF will be implemented at a more local level through development plans. The Blindwells Development Framework provides an opportunity to increase the economic growth and competitiveness of Scotland, as well as East Lothian. The Blindwells Development Framework offers an ideal opportunity to provide a national example of successful sustainable development, as well as promoting and enhancing the quality of the natural and built environment.</p>

	<p>The key aims of the strategy for Scotland's spatial development to 2025 are:</p> <ul style="list-style-type: none"> • to increase economic growth and competitiveness; • to promote social and environmental justice; and • to promote sustainable development and protect and enhance the quality of natural and built environments. 	
<p>Scottish Planning Policy (2010)</p>	<p>The SPP is the Scottish Government's policy on land use planning. The SPP outlines the Scottish Government's view of the purpose of planning and the core principles for the system's operation.</p> <p>The Scottish Government believes that a properly functioning planning system is essential to achieving increased sustainable economic growth. The way in which the planning system is structured and operated should be directed towards that purpose and in supporting the Scottish Government's 5 strategic objectives.</p> <p>This document supercedes the topic based individual SPP's that previously existed into a more comprehensive document.</p>	<p>The general principals of the individual SPP's has not changed, and therefore does not change the impacts as previously stated.</p>
<p>SPP2 Economic Development (2002)</p>	<p>Planning authorities should:</p> <ul style="list-style-type: none"> • Ensure that existing business locations are able to meet the anticipated changes in the economy and that they provide choice for a diverse range of economic developments. • Secure and support the delivery of sites for economic development in sustainable locations by identifying key locations that are highly accessible by public transport. • Promote the re-use of previously developed sites and buildings in sustainable locations where these meet the requirements of particular sectors. • Take account of the capability of information and communications technology (ICT) and the promotion of home-working to reduce the need to travel. • Safeguard and enhance the environment, by requiring that new development is of a high 	<p>The Blindwells Development Framework can contribute to East Lothian economy through its requirement for the provision of new business premises.</p>

	<p>design quality and protecting the natural and built heritage.</p> <ul style="list-style-type: none"> Encourage a positive culture of engagement with business interests by promoting dialogue between all those involved with business development, the Enterprise Networks and Local Economic Forums. <p>This SPP has now been superceded by SPP 2010, which was adopted after this document was issues. The principals and aims of the policy vision have not changed.</p>	
SPP3 Planning for Homes (2008)	<p>The key objectives of the SPP are to provide policy guidance on the:</p> <ul style="list-style-type: none"> identification of housing need and demand on a more consistent and robust basis through joint working between local authorities and a range of partners; the use of the planning system to facilitate the construction of well designed, good-quality housing in sustainable locations; allocation of a generous supply of land to meet identified housing requirements across all tenures, including affordable housing, and related policy objectives; mechanisms to help ensure that planned housing is built, including quick and efficient review of development plans to enable maintenance of a 5-year effective land supply; all of which supports; the creation of high-quality places, which support the development of sustainable communities. <p>This SPP has now been superceded by SPP 2010, which was adopted after this document was issues. The principals and aims of the policy vision have not changed.</p>	<p>The Blindwells Development Framework can help to contribute towards the objectives. The Development Framework will contain guidance to produce sustainable and high quality housing, through a mix of tenures, including the provision of affordable housing.</p>
SPP 6 Renewable Energy (2007)	<p>The SPP supports the Scottish Governments target of generating 40% of Scotland's electricity from renewable sources by 2020 and sets out the planning framework in which to achieve this target.</p> <p>This SPP has now been superceded by SPP 2010, which was adopted after this document was issues. The general principals and aims of the policy vision have not changed. The revised SPP states the target is for 50% of Scotland's electricity to be generated from</p>	<p>New building developments will have to adhere to new building standards implemented in 2007. The Development Framework will support that new developments should also address low carbon development through the use of energy efficient, microgeneration and decentralised renewable energy systems.</p>

	renewable sources by 2020, and local authorities should generally support a diverse range of renewables at different scales.	
SPP7 Planning and Flooding	<p>The SPP includes the following principles:</p> <ol style="list-style-type: none"> 1) Developers and planning authorities must give consideration to the possibility of flooding from all sources. 2) New development should be free from significant flood risk from any source 3) In areas characterised as 'medium to high' flood risk for watercourse and coastal flooding new development should be focussed on built up areas and all development must be safeguarded from the risk of flooding. 4) New development should not: – materially increase the probability of flooding elsewhere; – add to the area of land which requires protection by flood prevention measures; – affect the ability of the functional flood plain (see Glossary) to attenuate the effects of flooding by storing flood water; – interfere detrimentally with the flow of water in the flood plain; – compromise major options for future shoreline or river management. 5) Flooding from sources other than watercourses and on the coast must be addressed where new development is proposed. Any drainage measures proposed should have a neutral or better effect on the risk of flooding both on and off the site. 6) Alterations and small scale extensions to buildings are generally outwith the scope of this SPP provided they would not have a significant effect on the storage capacity of the functional flood plain or affect local flooding problems. <p>This SPP has now been superseded by SPP 2010, which was adopted after this document was issues. The principals and aims of the policy vision have not changed.</p>	<p>The Development Framework should promote the use of suitable and sustainable drainage measures that will not impact upon water quality of the local burns and that will provide mitigation for localised flood issues.</p> <p>The incorporation of sustainable drainage systems (SuDs) should be a consideration for the Development Framework.</p> <p>As stated in the SPP flood prevention and alleviation measures should not lead to a deterioration in the ecological status of the watercourse or body and may provide opportunities for habitat enhancement or creation.</p>
NPPG 8 Town Centres and Retailing (2006)	<p>Key policy objectives:</p> <ul style="list-style-type: none"> • Promote distinct, competitive places and encourage regeneration, in order to create 	<p>To support the creation of a sustainable community the Blindwells Development Framework will contain guidance for the creation of local retailing on site.</p>

	<p>town centres that are attractive to investors and suited to the generation of new employment opportunities;</p> <ul style="list-style-type: none"> • Create a climate that enables all sectors of the community to have access to a wide choice of shopping, leisure, and other services and for gaps and deficiencies in provision to be remedied; • Improve the physical quality and sustainability of our town centre environments; • Support development in existing locations or in locations where accessibility can be improved. 	
NPPG 10 Planning and Waste Management (1996)	<p>Encourage development which assists in the reduction, re-use and recovery of waste for example through the re-use of buildings wherever practicable. Protect groundwater.</p>	<p>Development at the Blindwells site will lead to an increase in waste generated locally. The Development Framework will require that measures be introduced to encourage reduction and re-use of waste where possible.</p>
SPP 11 Open Space and Physical Activity (2007)	<p>Key objective of SPP are:</p> <ul style="list-style-type: none"> • To protect and enhance open space; • To ensure a strategic approach to open space and other opportunities for sport and recreation by requiring local authorities to undertake an open space audit and prepare an open space strategy for their area; • To protect and support opportunities for sport and recreation; • To provide guidance on the quality and accessibility of open space in new developments and on providing for its long-term maintenance and management; • To provide guidance on planning for development of new indoor and outdoor facilities for sport and recreation <p>This SPP has now been superceded by SPP 2010, which was adopted after this document was issues. The principals and aims of the policy vision have not changed.</p>	<p>The Blindwells Development Framework provides opportunity to incorporate resources to improve local sports and recreation opportunities to support a healthy community</p>
NPPG 14 Natural Heritage (1999)	<p>Protection and, where appropriate, enhancement of internationally, nationally and locally designated areas and sites (including potential SPAs and SACs). Encourage the management and safeguarding of features of the landscape of major importance for</p>	<p>Development at Blindwells could have an impact on existing habitat and landscape. The Blindwells Development Framework provides an opportunity to create new habitats and enhance existing habitats. These can also provide leisure and recreational opportunities</p>

	<p>nature conservation or amenity, including field boundaries, woodlands, trees, lochs, ponds, watercourses and other wetlands.</p> <ul style="list-style-type: none"> • Include policies for the conservation and/or enhancement of landscape character, including where appropriate, wild land character. • Identify opportunities to extend native woodland cover and to maintain and enhance wetlands. • Provide the conservation of biodiversity and the protection and enhancement of the natural heritage outside designated areas. • Identify appropriate opportunities to improve public access for the purposes of enjoying and learning about the natural heritage. 	
SPP 17 Planning for Transport (2005)	Encourage people to make more journeys by walking, cycling, and public transport.	The Blindwells Development Framework provides an opportunity for the promotion of new sustainable transport. The Blindwells Development Framework must also illustrate how it can integrate with existing transport network. Opportunities to promote modes of transport other than the car should not be missed.
SPP 20 The Role of Architecture and Design Scotland (2005)	<p>Outlines the aims, roles, and responsibilities of A&D Scotland which include providing general design and architectural advice as well as:</p> <ul style="list-style-type: none"> • Support through design review • Enabling and advocacy; and • Research and communication <p>This SPP has now been superseded by SPP 2010, which was adopted after this document was issued. The principals and aims of the policy vision have not changed.</p>	The design guidance and processes contained in the SPP should be taken onboard during the production of the Development Framework.
SPP 23 Planning and the Historic Environment (2008)	<p>Sets out national planning policy for the historic environment and how the planning system can contribute towards the delivery of Scottish Minister policies contained within Scottish Historic Environmental Policy (SHEP).</p> <p>This SPP has now been superseded by SPP 2010, which was adopted after this document was issued. The principals and aims of the policy vision have not changed.</p>	The impact upon setting of cultural heritage features of the Blindwells Development Framework should be considered. Opportunity exists to contribute and compliment the existing historic environment through good design.
Scottish Historic Environmental Policy (SHEP) (2009)	Sets out Scottish Ministers policies for historic environment, provides greater policy direction for Historic Scotland and provides a framework which informs the work of a range of organisations that have a	The impact upon setting of cultural heritage features of the Blindwells Development Framework should be considered. Opportunity exists to contribute and compliment the existing historic environment through

	role and interest in managing the historic environment	good design.
Planning Advice Note 83: Masterplanning	<p>PAN 83 Aims to:</p> <ul style="list-style-type: none"> Promote the use of masterplanning to create better places; Explain how to achieve more effective masterplanning; Achieve more consistency in the presentation of masterplans; and Encourage good practice through a range of exemplar case studies 	The Blindwells Development Framework needs to take into account the good practice advice and procedures contained in the PAN, in particular by learning key lessons from case studies included within the PAN, in order to help inform and improvement the evolution of the Blindwells Development Framework. The Blindwells Development Framework should also seek to promote sustainability.
Policy and Supporting Guidance on Provision of Waste Water Drainage in Settlements - Policy 55 (September 2006)	<p>The position statement sets out SEPA's policy principles on the provision of waste water drainage within and outwith settlements served by a strategic sewerage system. The document also provides supporting guidance for implementation of these policy principles.</p> <p>The policy principles in this document will eventually be included in SEPA's Policy on Development Planning and the Water Environment, which is currently under development.</p>	In Blindwells Development Framework needs to carefully consider the content of the policy principles regarding waste water drainage given the existing site conditions i.e. No existing sewerage infrastructure or connection.
Policy and Position Statement on the Culverting of watercourses - Policy 26 (August 1998)	The policy sets out the environmental issues associated with culverting and presents a consistent and pragmatic approach to this aspect of river engineering.	The Blindwells Development Framework needs to carefully consider the content of the policy principles. This is of particular relevance to existing watercourses and drainage channels on the site such as Seton Burns.
Groundwater Protection Policy for Scotland - Policy 19 (December 2003)	<p>This policy aims to provide a sustainable future for Scotland's groundwater resources by protecting legitimate uses of groundwater and providing a common SEPA framework to:</p> <ul style="list-style-type: none"> Protect groundwater quality by minimising the risks posed by point and diffuse sources of pollution; Maintain the groundwater resource by influencing the design of abstractions and developments, which could affect groundwater quantity. <p>The policy consists of this overarching policy section which is supported by activity specific sections. The overarching section provides background information and is followed by SEPA's overall policy objectives which are in bold. The supporting sections identify</p>	The Blindwells Development Framework needs to carefully consider the content of the policy towards groundwater protection especially given the current groundwater conditions on the site (former use as a mine and groundwater pumping activity).

	mechanisms to achieve the overarching policy statements referring to specific aspects of groundwater protection.	
Local		
Lothian Landscape Character Assessment (1998)	Landscape character assessment aims provide a body of baseline knowledge on the landscapes of Scotland; facilitate the monitoring of landscape changes and advice on such change; and assist both in strategic development plan review and detailed planning and landscape casework.	Development will have a visible impact on landscape character and visual amenity and steps should be taken to minimise impact on neighbouring receptors – i.e. restricting building heights, screening, etc.
Edinburgh and Lothian's Structure Plan 2015 (2004)	Objectives of Structure Plan are: <ul style="list-style-type: none"> • Maintaining and enhancing economic competitiveness; • Promoting a more inclusive society; • Protecting and enhancing the natural and built environments; and • Integrating land use and transport 	The Blindwells Development Framework should adhere to policies contained within the Structure Plan, with specific reference to the Blindwells Core Development Area which is specifically mentioned within the plan.
Draft Forth Area Management Plan 2009 – 2015 (October 2008)	This document is a management plan for maintaining and improving the quality of the rivers, lochs, estuaries, coastal waters and groundwater of the Forth area. It provides an overview of the area and the current state of its water environment. The plan identifies ways in improving the water environment and who might be able to contribute to these improvements over the next six years. This plan focuses on local actions and highlights the opportunities for partnership working to ensure that everyone benefits from improvements to our water environment. Taking a local approach will contribute to the goals of the draft river basin management plan (RBMP).	The Development Framework should consider how it can help contribute towards the Forth Area Management Plans identified actions and objectives for improving the water quality at a local level (especially in relation groundwater) on the site.
East Lothian Council Adopted Local Plan 2000 and East Lothian Local Plan Finalised 2005 (to be adopted October 2008)	The adopted Local Plan was produced in 2000, however it is due to be replaced by the emerging finalised Local Plan which is now a material consideration in determining planning application. Both the adopted and emerging Local Plans have the same functions which are: <ul style="list-style-type: none"> • to apply national and regional planning policies; • to stimulate and encourage appropriate development; • to protect the environment from inappropriate development; 	The Blindwells Development Framework will have to conform and comply with various policies contained within the adopted and emerging plan, in particular the Development Framework should give effect to Proposal H1: Blindwells New Settlement of the Finalised 2005 Local Plan.

	<ul style="list-style-type: none"> to provide a detailed basis for the determination of planning applications; to show how those who have an interest in the area are affected by, or can contribute to, the implementation of the plan. 	
Active East Lothian – Playing Our Part (2004)	<p>Ambitions for the Strategy are:</p> <ul style="list-style-type: none"> To contribute to National and Local strategies and develop new and further strengthen existing partnerships for sport and physical activity; To work with colleagues in sport, health, social work, culture and community development, education, outdoor education and countryside access to get people, more activity, more often; To ensure that the Healthy Living Service is the lead department for the Health Improvement agenda and to work across departments to achieve the promotion of a broad range of health improvement activities; To contribute to the development of the Council as a Health Improvement Organisation as defined by COSLA; For the Healthy Living Service to be better able to identify gaps in provision and ensure that the service is capable of intercepting new opportunities in contributing to healthy lifestyles; and To work towards a socially inclusive East Lothian and monitor our Progress. 	The Blindwells Development Framework should help increase the levels of sport and recreational provision in the wider area through the development of new facilities and open spaces.
East Lothian Core Paths Consultation (2008)	Provide details of existing and proposed core path networks for the general public's usage in East Lothian response to the Land Reform (Scotland) Act 2003.	A core path is identified adjacent to the Blindwells site. Provision of new development is likely to increase local access through provision of new roads and footpaths.
East Lothian Local Transport Strategy (2008)	The prime objective of the strategy is to reduce the overall dependence on the private car and promote the use of more sustainable modes of transport, where practical to do so. Closer links will be established with the land use planning process and its ability to influence the location of new development.	The Development Framework should require that greater priority be given to pedestrians, cyclists and other public transport users over private vehicle users. Opportunities to promote new public transport links, and to link with existing services must be taken.
East Lothian Joint Economic Strategy (2006)	<p>The Council's Economic Development Division Business Plan 2005-2008 identifies four key objectives:</p> <ul style="list-style-type: none"> expanding the business base; East Lothian as a quality tourism destination; growing the rural economy; and 	The Blindwells Development Framework, through the provision of retail and business units, will provide new economic opportunities for the East Lothian area which should help strengthen the East Lothian economy. The East Lothian Joint Economic Strategy recognises Blindwells as an economic opportunity.

	<ul style="list-style-type: none"> maximising external funding. 	
East Lothian Tourism Action Plan 2004-2007 (2004)	<p>The plan identifies specific objectives and targets in three priority areas:</p> <ul style="list-style-type: none"> Tourism Marketing, including golf tourism Visitor Retention and Dispersal Product/Business Development 	The Blindwells Development Framework offers opportunity to provide for tourism related facilities and services– e.g. Battle of Prestonpans site, hotels, etc.
Consultation Draft East Lothian Heritage Strategy 2007-2010 (2007)	<p>Three main strategic priorities for the East Lothian Heritage Strategy 2007 – 2010 have been identified as:</p> <ul style="list-style-type: none"> Identity Community Involvement Infrastructure 	The impact upon setting of cultural heritage features of the Blindwells Development Framework should be considered. Opportunity exists to contribute and compliment the existing historic environment through good design.
East Lothian Community Engagement Strategy 2007-2010 (2008)	<p>The aim is to strengthen and extend community planning structures and mechanisms – so that people can get involved wherever and however is most appropriate for them and so that they link together at different levels</p> <ul style="list-style-type: none"> Increase the involvement of all communities, particularly children and young people, disabled people, those from different ethnic groups as well as other under-represented groups, in community planning processes at local level and around subjects that they are interested in – so that their different experiences, needs and views can be taken into account in our services Build the capacity of management, staff, community leaders and groups and individuals in community engagement – so that we have the confidence, skills, knowledge and resource we need to work together as equal partners Increase the coordination of our efforts in community engagement, sharing experiences, knowledge, skills, resources and funds – so that we can support each other, learn from our experience and celebrate our successes 	Blindwells Development Framework should allow people from existing surrounding communities to contribute ideas and concerns regarding the development of the site.
Draft East Lothian Council Sustainability Statement (2007)	<p>The aims of the Statement are:</p> <ul style="list-style-type: none"> To encourage sustainability in all policy To encourage sustainable lifestyles in East Lothian To ensure participative decision making To respect environmental limits and reduce environmental impact 	The Blindwells Development Framework should seek to minimise environmental impacts and promote sustainable living.
Draft East Lothian Environment Strategy 2007-2010	Contains objectives for the following topics:	The Blindwells Development Framework should

(2007)	<ul style="list-style-type: none"> • energy & buildings • built environment • transport • economy • natural environment • waste • land, water & air quality • communication & participation 	adhere and give effect to the objectives of the Environment Strategy.
East Lothian Council SPG 3: Design Standards for New Housing Areas (2008)	Guidance document which contains East Lothian Council's key planning and transportation requirements for the design of new housing areas concentrating on the implementation of Home Zones, layout, design standards etc.	The Blindwells Development Framework provides opportunity to implement Home Zone development which puts pedestrian's needs before motorists.
East Lothian BAP (2008)	<p>The aims of the East Lothian Biodiversity Partnership are to:</p> <ul style="list-style-type: none"> • ensure that no locally native species or habitat becomes extinct in East Lothian. • reverse the loss of Priority Species. • reverse the decline in extent and quality of Priority Habitats. • involve local communities in the biodiversity process. 	Development may have an impact on locally important flora and fauna. Development also allows opportunity to provide new habitats.
East Lothian Rights of Way Booklet		
Edinburgh & Lothian's Forest Habitat Network Framework	Aims to readdress the fragmentation of Edinburgh and the Lothians woodland through identifying woodland management priorities and areas to target for new planting.	The Blindwells Development Framework provides opportunity to provide new forestry habitats in East Lothian.
East Lothian School Estate Asset Strategy (March 2007)	<p>To deliver better public services through the school environment that focus on:</p> <ul style="list-style-type: none"> • meeting the needs of individual children; and • meeting the needs of communities. <p>To deliver those services, in a school estate that:</p> <ul style="list-style-type: none"> • provides a safe, secure environment for children and staff; • matches the demand for school places; • helps us deliver better public services by providing the appropriate facilities; • takes account of the long-term; • is designed to help us meet our aims; and • considers the environment. 	The Blindwells Development Framework provides opportunity to provide new schools in order to meet the growing pupil numbers in East Lothian



Appendix 5: Consultation comments