

ENVIRONMENTAL REPORT

DEVELOPMENT FRAMEWORK FOR LETHAM MAINS HADDINGTON

**PREPARED BY EAST LoTHIAN COUNCIL
UNDER THE TERMS OF THE ENVIRONMENTAL ASSESSMENT
(SCOTLAND) ACT 2005**

**The Executive Director of Environment
East Lothian Council
John Muir House
Haddington
EH41 3HA**

18 January 2011

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:

Development Framework for Letham Mains, Haddington

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	<div>Andrew Jenat.</div>
Date	<div>January 2011</div>

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(Including timescale and address for comments)

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1.0 NON-TECHNICAL SUMMARY

1.1 East Lothian Council has prepared a Draft Development Framework for Letham Mains Haddington. The purpose of the Development Framework is to set out the Council's land-use planning requirements for the land allocated here by the East Lothian Local Plan 2008 for a mixed-use development of 750 houses and associated uses.

1.2 Under the terms of the Environmental Assessment (Scotland) Act 2005, in consultation with Scottish Environment Protection Agency, Historic Scotland and Scottish Natural Heritage, it has been determined that the Development Framework should be the subject of Strategic Environmental Assessment (SEA) procedures to ensure that the best feasible environmental option is promoted for site development. For the avoidance of doubt it is the Development Framework for Letham Mains that is the subject of this SEA, not the allocation of the land for development.

1.3 East Lothian Council has already carried out Screening and Scoping of environmental issues in conjunction with the Scottish Executive SEA Gateway. This Draft Environmental Report sets out the processes gone through to date, the environmental issues raised and means by which they will be addressed in the future development of this site where known at this time.

1.4 Any environmental impacts are a consequence of the allocation of the land for housing and other uses in the East Lothian Local Plan 2008. Scottish Ministers exempted this Plan from the SEA process in 2005. Nonetheless, the Strategic Environmental Assessment process will ensure that the Development Framework for Letham Mains requires that the masterplan and planning applications submitted by applicants address matters of landscape and visual impact, watercourses, Listed Buildings, Scheduled Ancient Monuments, biodiversity conservation, protected species, sustainable housing, energy efficiency and transportation. Other land use planning matters will also be addressed in the Development Framework.

1.5 The Environmental Report does not consider alternative sites within the town or elsewhere as the requirement for the delivery of 750 houses and associated works specifically at Letham Mains, Haddington has been established by the East Lothian Local Plan 2008. This Local Plan is quite prescriptive in its requirements for the way Letham Mains is built out and so the Development Framework has very limited scope to depart from its requirements. Accordingly, there is no consideration of the environmental effects that might be occasioned by any significant development options that the Development Framework might otherwise have been able to consider.

1.6 The key aim of the Letham Mains Development Framework will be to ensure that the future development of the site at Letham Mains Haddington is carried out in a sustainable manner. The responsibility to provide detailed environmental data and any mitigation measures for any issues raised lies with the applicant(s) for development of the site as part of the information required in support of any masterplan and planning application(s) for the allocated land. It is the role of the Development Framework to procure from applicants the necessary supporting information to demonstrate that the implementation of their masterplan will deliver the best feasible environmental option for site development.

1.7 The consultation period for the Environmental Report and draft Development Framework is set out overleaf.

2.0 INTRODUCTION

2.1 Purpose of this Environmental Report and key facts

As part of the preparation of the Development Framework for Letham Mains Haddington, East Lothian Council is carrying out a Strategic Environmental Assessment (SEA). SEA is a systematic method for considering the likely environmental effects of certain Plans, Programmes and Strategies (PPS). SEA aims to:

- integrate environmental factors into PPS preparation and decision-making;
- improve PPS and enhance environmental protection;
- increase public participation in decision making; and
- facilitate openness and transparency of decision-making.

SEA is required by the Environmental Assessment (Scotland) Act 2005. The key SEA stages are:

Screening	determining whether the PPS is likely to have significant environmental effects and whether an SEA is required
Scoping	deciding on the scope and level of detail of the Environmental Report, and the consultation period for the report – this is done in consultation with Scottish Natural Heritage, The Scottish Ministers (Historic Scotland) and the Scottish Environment Protection Agency
Environmental Report	publishing an Environmental Report on the PPS and its environmental effects, and consulting on that report
Adoption	providing information on: the adopted PPS; how consultation comments have been taken into account; and methods for monitoring the significant environmental effects of the implementation of the PPS
Monitoring	monitoring, where within land-use planning legislation requirements, significant environmental effects in such a manner so as to also enable the Responsible Authority to identify any unforeseen adverse effects at an early stage and undertake appropriate remedial action.

The purpose of this Environmental Report is to:

- provide information on the Development Framework for Letham Mains Haddington;
- identify, describe and evaluate the likely significant effects of the PPS and its reasonable alternatives;
- provide an early and effective opportunity for the Consultation Authorities and the public to offer views on any aspect of this Environmental Report.

Consultation Period

The consultation period for the Environmental Report will run for a period of **six weeks** between **18/10/10 and 29/11/10**. All comments on the Report or draft Development Framework for Letham Mains Haddington **must** be received by **12.00pm** noon on **29/11/10**. All comments should be sent to the contact point set out on the next page.

INTRODUCTION (cont)

- 2.2 The key facts relating to the Development Framework for Letham Mains Haddington are set out in Table 1 below.

Table 1. Key facts relating to Development Framework for Letham Mains Haddington

- **Name of Responsible Authority**

East Lothian Council

- **Title of PPS**

Development Framework for Letham Mains Haddington

- **What prompted the PPS**

The East Lothian Local Plan 2008 requires the preparation of development frameworks for all its strategic land allocations. These frameworks will define the Council's planning requirements for the development of these sites.

- **Subject**

Land-use planning framework for mixed use, predominantly residential development, on land allocated for such use by the East Lothian Local Plan 2008.

- **Period covered by PPS**

From current time to implementation of last planning permission

- **Frequency of updates**

None anticipated once approved.

- **Area covered by PPS**

Approximately 43 hectares (See Map)

- **Purpose and/or objectives of PPS**

To provide land use planning guidance for the development of land at Letham Mains for 750 houses and associated works made through Proposal H4 of the East Lothian Local Plan 2008. As a consequence of the Local Plan allocation and its built development requirement, the effect on the majority of the land will largely be permanent.

- **Contact point**

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

Tel: 01620 827395
Email: astewart3@eastlothian.gov.uk

SEA activities to date

- 2.3 Table 2 summarises the SEA activities to date in relation to the Development Framework for Letham Mains Haddington

Table 2. SEA activities to date

SEA Action/Activity	When carried out	Notes (e.g. comment on data availability, particular issues or any advice from the Consultation Authorities that has now been taken into account)
Screening to determine whether the PPS is likely to have significant environmental effects	February – April 2007	Council submitted screening opinion 15 th February 2007. Consultation Authority response received 14 th March 2007. Council Determination that SEA required 11 th April 2007. Advertised in local press 20 th April 2007.
Scoping the consultation periods and the level of detail to be included in the Environmental Report	April – May 2007	Advice received from Consultation Authorities used to amend Screening Report and draft PPS to ensure compliance with requests.
Outline and objectives of the PPS	February – April 2007	Established as part of early draft of PPS and set out in SEA screening / scoping documents.
Relationship with other PPS and environmental objectives	April 2007	Established as part of the Scoping Opinion and amended as a result of Consultation Authority responses.
Environmental baseline established	2001 - present	Environmental baseline established through preparation of Finalised East Lothian Local Plan 2005, draft development framework for site and screening / scoping process for SEA. Continues to be developed as part of this process. Will be fully set out in supporting information as part of any planning application for site.
Environmental issues identified	2001 - present	Environmental issues established through preparation of Finalised East Lothian Local Plan 2005 draft development framework for site and screening / scoping process for SEA. Continues to be developed as part of this process.
Assessment of future of area without the PPS		This is not an option as the Development Framework is a requirement of the East Lothian Local Plan 2008.
Alternatives considered		Alternative sites to accommodate the 750-house requirement in Haddington were assessed through the preparation of the Finalised East Lothian Local Plan 2005 and Scottish Ministers exempted this from the

		requirement for SEA in 2005.
Environmental assessment methods established	Ongoing	Environmental Assessment methods will vary depending on the nature of the topic assessed e.g. transport assessment will be different to habitat enhancement plans.
PPS alternatives to be included in the environmental assessment	April – May 2007	The land allocation for residential / mixed-use development is established by the East Lothian Local Plan 2008 and is outwith the scope of the PPS to consider alternative sites. The Local Plan is prescriptive in its requirements for the development of the land at Letham Mains and therefore there are no realistic options that could be tested which would have anything other than small scale environmental effects. Accordingly, the Environmental Report does not test alternatives. It does however require that during the master planning process that alternative layout options be considered where development will interface with key receptors.
Identification of environmental issues that may persist after implementation and measures envisaged to prevent, reduce and offset any significant adverse effects	Post planning permission and construction	Monitoring requirements will be fulfilled once testing and supporting studies have been completed and submitted with a masterplan and planning applications.
Monitoring methods proposed	Post planning permission and construction	Carried out through and limited to the Planning Enforcement function of the Council
Consultation timescales <ul style="list-style-type: none"> • Timescale for Consultation Authorities • Timescale for public 		The consultation period for all stakeholders will last six weeks
Notification / publicity action	April 2007	Newspaper advertisement of Council Determination that SEA required – dated 11 th April 2007. Appeared in local newspapers dated 20 th April 2007 Consultation timescales for Environmental Report will be similarly advertised.

3.0 CONTEXT

Outline and objectives of the Development Framework for Letham Mains Haddington

3.1 Schedule 3 of the Environmental Assessment (Scotland) Act 2005 requires that the Environmental Report include “*an outline of the contents and main objectives of the plan or programme*”. The purpose of this section is to explain the nature, contents, objectives and timescale of the PPS.

3.2 The purpose of the Framework is to provide land use planning guidance for the development of land at Letham Mains for a mixed-use development including 750 houses and associated works made through Proposal H3 of the East Lothian Local Plan 2008. The Council is committed to prepare Development Frameworks for all strategic land allocations made through the East Lothian Local Plan 2008, prepared under the terms of the Town & Country Planning (Scotland) Act 1997.

3.3 The Development Framework is prepared and approved by East Lothian Council, as planning authority, following public consultation. It expands on and clarifies the requirements of the Local Plan, but does not itself devise or require that a particular layout and design be presented for planning permission. It operates at a stage in the process where much of the information necessary to prepare masterplans / devise the development strategy is not available; indeed, it is the role of the Development Framework to draw attention to the key issues, placing a requirement on developers to produce technical and other studies to ensure that, through the iterative masterplanning process, the information is available to ensure that the best feasible environmental option for the development of the site is reached.

3.4 As such, the Development Framework establishes the broad parameters within which developers must work in preparing masterplan proposals, and also identifies the supporting studies / assessments that will be needed in support of any masterplan and application for planning permission. The Framework undertakes a contextual analysis of the site. It requires developers to address land use matters of movement (access), housing, education provision, open space, built heritage, biodiversity, natural heritage, community uses and infrastructure, as well as the need to mitigate visual and other environmental impacts as required. It sets broad design requirements for the urban form and landscaping expected to come forward on the site. It requires an implementation timetable and expected masterplan outputs that would accompany any planning applications for the site as well as the process for determining planning applications. All of this is undertaken in the context of national policy and advice on these matters.

3.5 The timescale of the Framework will be from the date of its approval by the Council to the implementation of the last planning consent. It is not anticipated that any update of the PPS will be required during the period of site development. The effectiveness of the requirements of the Development Framework and how it is implemented will be monitored. This will assess the extent to which the Framework's requirements are implemented on the ground and how successful the overall development is in creating a sustainable expansion of Haddington. This will in turn feed into the preparation of future Development Frameworks and any lessons learned applied. The key development principles that will underpin the Development Framework will be –

- Sustainable, energy efficient housing in a range of types, sizes and tenures;
- The application of Home Zone principles wherever possible to minimise the impact of accommodating traffic and provide more people-friendly layouts;
- Serviced land for affordable housing;
- A new pre-school and primary school;
- A new community sports pitch with associated changing accommodation;
- Provision for a mixed use, local centre capable of accommodating local retail or related services and/or commercial/office space;
- An all-purpose distributor road linking the A6093 Pencaitland Road and the B6471 West Road;
- A linear park along the Letham Burn

- Protection of a Scheduled Ancient Monument
- Extensive landscape framework

3.6 The Development Framework requires that baseline data is established through a wide variety of supporting documentation that will accompany any masterplan and planning application submissions for the site. This will allow the planning authority, consultees and other interested parties to assess the impacts of these planning applications. This includes –

- Site Appraisal
- Landscape and visual impact assessment
- Landscape framework
- Flood risk assessment
- Drainage impact assessment
- Biodiversity habitat survey
- Method statement for enhancement of Letham Burn & St Laurence House Burn
- Archaeological assessment
- Energy efficiency statement
- Transport assessment

Scoping In/Out of SEA Issues

3.7 The scoping stage identified those issues that were considered likely to have significant environmental effects and those issues to be excluded as they were either not considered relevant to the Framework or there was no significant environmental effect as a result of the Framework. This has been agreed with Consultation Authorities (Scottish Natural Heritage, Scottish Environment Protection Agency, Historic Scotland). The table below illustrates those factors that have been 'scoped in' and 'scoped out' of this Environmental Report.

Table 3. Environmental Issues relevant to Development Framework

SEA Issue	Scoped In/Out	If Scoped Out, why?
Biodiversity, flora and fauna (Biodiversity Conservation & Protected Species etc)	✓	
Population	x	Due to the nature of the proposed development and the role and size of Haddington as county town in East Lothian, the development of 750 houses and associated uses will not have a significant environmental effect on the population of the town, particularly as enhancement of infrastructure capacity will be provided.
Human Health	x	Due to the nature of the development and other legislative provisions in place to protect human health the Framework will not have a significant environmental effect on human health.

Soil	x	The development of the area covered by the Framework will result in the loss of a greenfield site in agricultural use. However, this is due to the allocation of the land for development by the East Lothian Local Plan 2008, and not as a direct result of this Framework.
Water (including Water Courses)	✓	
Air	x	The nature and scale of development proposed and emphasis of the Framework on providing opportunities for use of sustainable transport modes will result in no significant negative impact on air quality in the area.
Climatic Factors	x	The area covered by the Framework and scale of the development proposed will not make a significant impact on the climate of the area.
Material Assets (including Sustainable Housing, Energy Efficiency and Transport Infrastructure)	✓	
Cultural Heritage (including Listed Buildings, Scheduled Ancient Monuments and sites on the Sites and Monuments Record)	✓	
Landscape (including Landscape and Visual Impact)	✓	

Relationship with other PPS and environmental protection objectives

3.9 Schedule 3 of the Environmental Assessment (Scotland) Act 2005 requires that the Environmental Report includes an outline of the PPS relationships with other relevant PPS, and how environmental protection objectives have been taken into account in the PPS preparation. This section covers these issues and describes the policy context within which the PPS operates, and the constraints and targets that this context imposes on the PPS.

3.10 Table 3 (below) summarises how the Development Framework for Letham Mains Haddington affects, and is affected by, other relevant PPS and environmental objectives. The PPS identified below reflects those identified in the Council's Scoping Report and those additional PPS identified by the Consultation Authorities. These PPS have also been reviewed and updated to reflect the publication of new and updated PPS since the submission of the original Scoping Report in 2007.

Table 4. Relevant plans, programmes and strategies (PPS) and environmental protective objectives, and their relationship with the Development Framework for Letham Mains Haddington

Name of PPS / environmental protection objective	Title of legislation and main requirements of PPS / environmental protection objective	How it affects, or is affected by the Development Framework for Letham Mains Haddington in terms of SEA Issues¹ at Schedule 3 of the Environmental Assessment (Scotland) Act 2005
National Planning Framework 2, Scottish Government Planning Policy (2010) & relevant Planning Advice Notes	Town & Country Planning (Scotland) Act 1997 Planning etc. (Scotland) Act 2006	Material consideration in land-use planning system. National Planning Framework, Scottish Planning Policy and relevant Planning Advice Notes will be taken into account in drafting the PPS and assessing any future masterplan, development proposal or planning application for the PPS site.
Scotland's Biodiversity – It's in Your Hands, A strategy for the conservation and enhancement of Biodiversity in Scotland (2004)	Convention on Biological Diversity	Sets out a vision for the future health of Scotland's biodiversity and maps out a 25 year framework for action to conserve and enhance biodiversity. The PPS must be consistent with the requirements of this strategy and ensure that subsequent Letham Mains masterplan and planning applications are also consistent.
Water Framework Directive (2000/60/EC)	European Directive	Establishes legal framework for protection, improvement and sustainable use of European water bodies – rivers, canals, lochs etc. Main objective to protect and improve UK water environment. The PPS must be consistent with their requirements and ensure that the subsequent Letham Mains masterplan and planning applications are also consistent.
Flood Risk Management (Scotland) Act 2009		Requires Scottish Ministers, SEPA and responsible authorities to exercise their flood risk related functions with a view to reducing overall flood risk. The PPS must be consistent with the requirements of this Act and ensure that the subsequent Letham Mains masterplan and planning applications are also consistent.

¹ Biodiversity, flora, fauna, population, human health, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage), landscape, inter-relationship between these issues; secondary and cumulative effects.

Name of PPS / environmental protection objective	Title of legislation and main requirements of PPS / environmental protection objective	How it affects, or is affected by the Development Framework for Letham Mains Haddington in terms of SEA Issues¹ at Schedule 3 of the Environmental Assessment (Scotland) Act 2005
<p>Scottish Historic Environment Policy (2009)</p> <p>Guidelines for the Detailed Consideration of Listed Building and Conservation Area Consent Cases</p> <p>Ancient Monuments & Archaeological Areas</p>	<p>Planning (Listed Buildings & Conservation Areas) (Scotland) Act 1997</p> <p>Ancient Monuments & Archaeological Areas Act 1979</p>	<p>Sets out Scottish Ministers strategic policy for the Historic Environment, and for the identification and designation of nationally important ancient monuments. Guidelines set out guidance with the objective to protect and, where appropriate enhance the historic environment. The PPS must be consistent with their requirements and ensure that the subsequent Letham Mains masterplan and planning applications are also consistent.</p>
<p>Changing Our Ways – Scotland's Climate Change Programme (2006)</p>	<p>Scottish Executive (March 2006)</p>	<p>Sets framework for delivering carbon savings from devolved policy measures and supports increased efforts to transform Scotland into a technologically advanced and sustainable low-carbon economy. The PPS must ensure that the subsequent masterplan, planning application and supporting documents have regard to issues of sustainable development and climate change.</p>
<p>Scottish Natural Heritage Landscape Character Assessment (2002)</p>	<p>Scottish Natural Heritage</p>	<p>Framework for classification / description of landscape character. The PPS must ensure that it and the subsequent masterplan for Letham Mains take landscape considerations into account.</p>
<p>Scottish Natural Heritage Landscape Policy Framework (2005)</p>	<p>Scottish Natural Heritage</p>	<p>Sets out Scottish Natural Heritage approach to Scotland's landscape. The PPS must ensure that it and the subsequent masterplan for Letham Mains take landscape considerations into account.</p>
<p>Edinburgh & the Lothians Structure Plan 2015</p>	<p>Town & Country Planning (Scotland) Act 1997</p> <p>Planning etc. (Scotland) Act 2006</p>	<p>Structure Plan sets strategic land use planning context for Lothian. Requires that land for 750 houses be identified in Haddington.</p>

Name of PPS / environmental protection objective	Title of legislation and main requirements of PPS / environmental protection objective	How it affects, or is affected by the Development Framework for Letham Mains Haddington in terms of SEA Issues¹ at Schedule 3 of the Environmental Assessment (Scotland) Act 2005
East Lothian Local Plan 2008	Town & Country Planning (Scotland) Act 1997 Planning etc. (Scotland) Act 2006	The East Lothian Local Plan 2008 must conform to the structure plan and set a detailed land use policy framework for East Lothian. Proposal H3 allocates land for 750 houses and related uses at Letham Mains. The PPS must be consistent with the requirements of this policy and ensure that the subsequent Letham Mains masterplan and planning applications are also consistent.
East Lothian Council Affordable Housing Policy (2006)		Council affordable housing policy adopted as supplementary planning guidance will ensure that a proportion of the site comes forward as affordable housing. The PPS must be consistent with the requirements of this policy.
East Lothian Council Design Standards for New Housing Areas (2008)		Council Design Standards for New Housing Areas will ensure an efficient use of land, quality design and layout for future development, promote energy efficiency and maximise the use of Home Zone principles. The PPS must be consistent with the requirements of this policy and ensure that the subsequent Letham Mains masterplan and planning applications are also consistent.
East Lothian Biodiversity Action Plan (2008) and East Lothian Council Biodiversity Habitat Plan for Urban Areas	Convention on Biological Diversity Nature Conservation (Scotland) Act 2004	Identify species and habitats in greatest need, protect existing wild spaces and enhance degraded wild habitats and promote development that does not damage the environment. The PPS must be consistent with the requirements of this policy and ensure that the subsequent Letham Mains masterplan and planning applications are also consistent.

Name of PPS / environmental protection objective	Title of legislation and main requirements of PPS / environmental protection objective	How it affects, or is affected by the Development Framework for Letham Mains Haddington in terms of SEA Issues¹ at Schedule 3 of the Environmental Assessment (Scotland) Act 2005
Lothian and Borders Area Waste Plan (2003)	National Waste Plan (1999) National Waste Strategy (2003)	The Area Waste Plan sets out the way that waste should be handled according to Best Practicable Environmental Options. The National Waste Plan and the Area Waste Plan, in accordance with PAN63: Waste Management Planning, are both material considerations in the preparation of this PPS and determination of any future planning application. The PPS must be consistent with their requirements and ensure that the subsequent Letham Mains masterplan and planning applications are also consistent.
Forth Area River Basin Management Plan (2010)	Water Framework Directive	Purpose is to maintain and improve the ecological status of river, lochs, estuaries, coastal waters and ground waters in the Forth area advisory group. The PPS should not conflict with the plan and seek to enhance the environmental quality of Letham and St Laurence House Burns and ensure that the subsequent Letham Mains masterplan and planning applications are also seek to do this.
East Lothian Council Open Space Strategy East Lothian Council Draft Sports Pitch Strategy	Scottish Planning Policy	Sets out open space and pitch requirements for East Lothian and are directly applicable to areas of new development. The PPS must be consistent with their requirements and ensure that the subsequent Letham Mains masterplan and planning applications are also consistent.
Haddington Traffic Study	East Lothian Council	2000-01 Study examined parking, pedestrian movement, road safety and public transport in Haddington. The introduction of 750 houses and associated uses at Letham Mains may impact upon these findings.
East Lothian Council Local Transport Strategy (2000)	Transport (Scotland) Act 2005	Prime objective to reduce the overall dependence on the private car and promote availability and use of alternative, more sustainable modes of transport where practical to do so. The PPS must ensure that the subsequent masterplan, planning application, Transport Assessment and supporting documents consider these issues

Name of PPS / environmental protection objective	Title of legislation and main requirements of PPS / environmental protection objective	How it affects, or is affected by the Development Framework for Letham Mains Haddington in terms of SEA Issues¹ at Schedule 3 of the Environmental Assessment (Scotland) Act 2005
East Lothian Draft Core Path Plan (2010)	The Land Reform (Scotland) Act 2003	Establish Core Paths Network throughout East Lothian to give reasonable access to the countryside. The PPS must be consistent with its requirements and ensure that the subsequent Letham Mains masterplan and planning applications protect existing rights of way.
East Lothian Environment Strategy, Consultation Draft (2010)	East Lothian Council	Long term vision is that East Lothian is a place of opportunity, with a thriving low carbon economy and a high quality environment for all. The PPS must ensure that the subsequent masterplan, planning application and supporting documents have regard to the objectives set out in this strategy.

3.11 As established through the SEA Scoping process the Framework promotes site development principles that take into account environmental considerations and provides appropriate mitigation measures. The responsibility for carrying out mitigation measures lies with the applicant / developer of the site, in accordance with the Framework, approved Masterplan and the terms of subsequent planning permissions.

3.12 The Framework promotes sustainable development as a positive aim in all aspects of the future development of Letham Mains. It promotes the provision of well designed and appropriately located energy efficient buildings and a range of house types and sizes that make best use of land and the wider physical characteristics of the site. The Framework recognises the need to provide sufficient formal and informal public open space. It recognises the biodiversity importance of the site and imposes controls and limits to protect and enhance this interest. Similarly, the Framework recognises the need to protect the historic environment through controls on development affecting Listed Buildings and the Scheduled Ancient Monument. The Framework promotes accessible public transport and sustainable urban drainage.

Relevant aspects of the current state of the environment

3.13 Schedule 3 of the Environmental Assessment (Scotland) Act 2005 requires that the Environmental Report include a description of "the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme", and "the environmental characteristics of areas likely to be significantly affected". This section aims to describe the environmental context within which the PPS operates and the constraints and targets that this context imposes on the PPS.

3.14 Environmental issues affecting the area of the Framework have been previously identified in this Report and are detailed in the Framework itself. The environmental baseline for this specific site has been established through the East Lothian Local Plan 2008: that is, it will comprise an area of residential / mixed use development and associated roads, open space and hard and soft landscaping. The main issues to be addressed so far by the SEA process are landscape and visual impact, watercourses, Listed Buildings, Scheduled Ancient Monuments, biodiversity conservation, protected species, sustainable housing, energy efficiency and traffic. The Framework puts in place the requirement that these, and other, matters must be addressed by developers. Further technical detail and mitigation measures (to be carried out by developer(s)) will be set out in the series of supporting documentation that will accompany

any future planning application for the site. The bullet points below summarises the data (to be) collected and the source.

- **General environmental report** (applicant)
- **Landscape / visual impact assessment** (applicant)
- **Landscape framework** (applicant)
- **Flood risk assessment** (applicant / Scottish Environment Protection Agency)
- **Drainage impact assessment** (applicant / Scottish Water)
- **Biodiversity habitat survey** (applicant)
- **Method statement for Letham & St Laurence House Burn** (applicant)
- **Archaeological assessment** (applicant)
Note – this will include Listed Buildings, Scheduled Ancient Monument and site on the Sites & Monuments Records
- **Energy efficiency statement** (applicant)
- **Transport assessment** (applicant)

3.15 All information on the above will be provided by the applicant(s) for planning permission for the site in advance of, or at the same time as, the submission of any planning application.

3.16 The following describes the area that is the subject of the Development Framework for Letham Mains Haddington. The allocated site covers an area of approximately 43 hectares. The land slopes generally in a northwest – southeast direction (78m – 50m above sea level), with low points towards the Letham and St Laurence House Burns. The most prominent outlook is to the south with longer distance views to the flat agricultural land and beyond to the Lammermuir Hills.

3.17 The site is bounded to the north by Gateside Commerce Park set in an attractive landscape setting. The northern edge of the site is largely hedgerow. Beyond the eastern boundary of the St Laurence House Burn with associated public open space are the rear gardens of housing at Burnside. A prominent tree belt, part of the setting of the Category 'B' Listed Letham House, dominates the western edge. To the southwest is agricultural land beyond which are the low-density residential and agricultural buildings that form the eastern edge of Letham Mains Holdings. The southwestern boundary of the site crosses open agricultural land of the southwest field.

3.18 As the area is intensely farmed it has few natural features influencing its development. However, the Letham Burn has biodiversity value. It dissects the centre of the site from east to west. It is crossed by a public right of way that follows its alignment. The right of way links to the eastern boundary footpath and, in turn, to established foot and cycle paths at Burnside.

3.19 Field boundaries comprise either stone walls or hawthorn hedging, in various states of repair. Dividing the south east and south west fields is a well established 2-3m hedgerow that defines the boundary between the rural landscape on the approach to Haddington from Pencaitland and the start of the built up area of the town.

3.20 Although not visible on the ground, the St Laurence House Bridge Enclosure, a Scheduled Ancient Monument, is located within the northeast field and covers an area of approximately one hectare.

Baseline Data

3.21 The detail of baseline data for site development will be established by the technical documents to be submitted in support of future planning applications. It is not the role of the Development Framework to establish the detail of this data but to set the requirement for it to be produced. For example, whilst the Framework requires that a Habitat Survey be carried out, it is not prescriptive on the content of that

Survey. It is expected that applicants for planning permission will contact all relevant bodies to establish the necessary baseline information inputs into technical documents.

Environmental issues

3.22 Schedule 3 paragraph 4 of the Environmental Assessment (Scotland) Act 2005 requires that the Environmental Report includes a description of existing environmental issues, in particular those relating to areas of particular environmental importance. The purpose of this section is to explain how existing environmental issues will affect or be affected by the Development Framework for Letham Mains Haddington, and whether the PPS is likely to reduce or otherwise affect existing environmental issues.

3.23 The Framework is not of itself the source of any environmental impacts. Part of its function will be to ensure that any adverse environmental impacts associated with the land's allocation in the East Lothian Local Plan 2008 are addressed through enhancement, reduction, remediation or compensation measures.

3.24 Environmental issues have been identified through discussions with Historic Scotland, the Scottish Environment Protection Agency and Scottish Natural Heritage and an analysis of available baseline data. Any issues that arise through the planning application process will be dealt with at that stage.

Table 5: Environmental Issues

Issue	Supporting data (where available)	Implications for PPS
Landscape & Visual Impact	<p>Scottish Natural Heritage Landscape Character Assessment (2002)</p> <p>Scottish Natural Heritage Landscape Policy Framework (2005)</p> <p>East Lothian Council Development Options Study 2002 and associated Reports comments on landscape and visual impact.</p> <p>All relevant correspondence received from Scottish Natural Heritage as part of Local Plan preparation process.</p> <p>East Lothian Local Plan 2008 specific comments and requirements set out in relation to landscape and visual impact of site development.</p> <p>Wider East Lothian Local Plan 2008 Policy Framework</p> <p>Masterplan Report for 750 houses submitted by development consortium for site as part of Finalised East Lothian Local Plan Public Local Inquiry.</p> <p>Landscape Capacity & Visual Impact Appraisal submitted by development consortium for site as part of Finalised East Lothian Local Plan 2005 Public Local Inquiry process.</p>	<p>Ensure that the Development Framework recognises and requires that developers take account of:</p> <p>(i) the potential landscape and visual impact of their proposed development;</p> <p>(ii) the need to reduce, remove or mitigate landscape and visual impact in all development circumstances through building layout and design and provision of formal and informal public open space;</p> <p>(iii) the need to identify important landscape features and visual landmarks within and outwith the site, and to provide appropriate specific measures to protect these features and views;</p> <p>(iv) the need to identify specific character areas within the site and promote development appropriate to these areas;</p> <p>(v) the need for a full up to date Landscape & Visual Impact Assessment and Landscape Framework to be incorporated into required masterplan, and for it to assess alternatives for</p>

Issue	Supporting data (where available)	Implications for PPS
		the design of the site edges aimed at integrating the expansion with the townscape and wider landscape to create positive new urban edges and minimising the developments visual impact.
Water Courses	<p>East Lothian Council Development Options Study 2002 and associated Reports comments on watercourses.</p> <p>All relevant correspondence received from Scottish Natural Heritage / Scottish Water as part of Local Plan preparation process.</p> <p>East Lothian Local Plan 2008 specific comments and requirements set out in relation to visual impact of site development.</p> <p>Wider East Lothian Local Plan 2008 Policy Framework.</p> <p>Masterplan Report for 750 houses submitted by development consortium for site as part of Finalised East Lothian Local Plan Public Local Inquiry.</p> <p>Landscape Capacity & Visual Impact Appraisal submitted by development consortium for site as part of Finalised East Lothian Local Plan 2005 Public Local Inquiry process.</p> <p>Drainage Options Report commissioned of Scottish Water by development consortium.</p> <p>Lothian Wildlife Information Centre Biodiversity Assessment of East Lothian Proposed Development Sites. This analyses the biodiversity merits of the Councils preferred strategic employment and housing sites, including assessment of same for reasonable alternative sites.</p> <p>Water Framework Directive</p> <p>Forth Area River Basin Management Plan</p>	<p>Ensure that the Development Framework recognises and requires that developers:</p> <p>(i) protect and enhance all watercourses both directly and indirectly affected by site development;</p> <p>(ii) promote habitat enhancement and maintain wildlife corridors;</p> <p>(iii) in compliance with Scottish Planning Policy, ensure that all watercourses are incorporated into the proposed development scheme;</p> <p>(iv) avoid culverting;</p> <p>(v) ensure that an appropriate SUDS scheme agreed with Scottish Water and Scottish Environment Protection Agency is put in place for the site;</p> <p>(v) undertake Flood Risk Assessment;</p> <p>(vi) submit Drainage Impact Assessment in support of planning application for site.</p> <p>(vii) submit a Site Appraisal, which includes testing of alternative development layouts in the vicinity of Letham Burn and St Laurence House Burn, to accompany any planning application to inform the ways in which potential impacts on this habitat, the ecology and amenity of the area will be conserved and enhanced</p>
Biodiversity Conservation	<p>East Lothian Council Development Options Study 2002 and associated Reports comments on biodiversity.</p> <p>East Lothian Local Biodiversity Action Plan.</p> <p>East Lothian Council Biodiversity Habitat Plan for Urban Areas.</p>	<p>Ensure that the Development Framework recognises and requires that developers:</p> <p>(i) promote biodiversity conservation / enhancement;</p> <p>(ii) protect and promote the</p>

Issue	Supporting data (where available)	Implications for PPS
	<p>All relevant correspondence received from Scottish Natural Heritage / Scottish Water / Scottish Environment Protection Agency as part of Local Plan preparation process.</p> <p>East Lothian Local Plan 2008 specific comments and requirements set out in relation to biodiversity impact of site development.</p> <p>Wider East Lothian Local Plan 2008 Policy Framework.</p> <p>Masterplan Report for 750 houses submitted by development consortium for site as part of Finalised East Lothian Local Plan Public Local Inquiry.</p> <p>Lothian Wildlife Information Centre Biodiversity Assessment of East Lothian Proposed Development Sites. This analyses the biodiversity merits of the Councils preferred strategic employment and housing sites, including assessment of same for reasonable alternative sites.</p>	<p>Letham Burn corridor for biodiversity</p> <p>(iii) provide formal / informal public open space and full range of natural habitats appropriate to the site;</p> <p>(iv) incorporate East Lothian Council Biodiversity Habitat Plan for Urban Areas and East Lothian Biodiversity Action Plan requirements;</p> <p>(v) provide a Landscape Framework;</p> <p>(vi) undertake a biodiversity habitat survey of site to establish its existing natural heritage , including legally protected species, Priority Species and the extent of existing habitats, as well as Species of Conservation Concern and any other relevant items;</p> <p>(vi) provide a Method Statement for enhancement of the Letham and St Laurence House Burns and submit as part of any planning application;</p> <p>(vii) submit a Site Appraisal, which includes testing of alternative development layouts in the vicinity of Letham Burn and St Laurence House Burn, to accompany any planning application to inform the ways in which potential impacts on this habitat, the ecology and amenity of the area will be conserved and enhanced</p>
Protected Species	<p>East Lothian Council Development Options Study 2002 and associated Reports comments on biodiversity.</p> <p>East Lothian Local Biodiversity Action Plan.</p> <p>East Lothian Council Biodiversity Habitat Plan for Urban Areas.</p> <p>Lothian Wildlife Information Centre survey information.</p> <p>All relevant correspondence received from Scottish Natural Heritage / Scottish Water / Scottish Environment Protection Agency as part of Local Plan preparation process.</p>	<p>Ensure that the Development Framework recognises and requires that developers:</p> <p>(i) undertake a biodiversity habitat survey of site to establish its existing natural heritage, including legally protected species, Priority Species and the extent of existing habitats as well as Species of Conservation Concern and any other relevant items;</p>

Issue	Supporting data (where available)	Implications for PPS
	<p>East Lothian Local Plan 2008 specific comments and requirements set out in relation to biodiversity impact of site development.</p> <p>Wider East Lothian Local Plan 2008 Policy Framework.</p> <p>Masterplan Report for 750 houses submitted by development consortium for site as part of Finalised East Lothian Local Plan Public Local Inquiry.</p> <p>Lothian Wildlife Information Centre Biodiversity Assessment of East Lothian Proposed Development Sites. This analyses the biodiversity merits of the Councils preferred strategic employment and housing sites, including assessment of same for reasonable alternative sites.</p>	<p>(ii) submit a Method Statement for enhancement of the Letham and St Laurence House Burns as part of any planning application;</p> <p>(iii) protect / enhance protected species habitat during all site development phases;</p> <p>(iv) provide public open space and creation of park along Letham and St Laurence House Burns;</p> <p>(v) ensure SUDS design that helps water vole habitats.</p> <p>(vii) submit a Site Appraisal, which includes testing of alternative development layouts in the vicinity of Letham Burn and St Laurence House Burn, to accompany any planning application to inform the ways in which potential impacts on this habitat, the ecology and amenity of the area will be conserved and enhanced</p>
Listed Buildings	<p>East Lothian Council Development Options Study 2002 and associated Reports comments on Listed Buildings.</p> <p>All relevant correspondence received from Historic Scotland as part of Local Plan preparation process. Historic Scotland Detailed Listing for buildings.</p> <p>East Lothian Local Plan 2008 specific comments and requirements set out in relation to impact of site development on Listed Buildings.</p> <p>Wider East Lothian Local Plan 2008 Policy Framework.</p> <p>Masterplan Report for 750 houses submitted by development consortium for site as part of Finalised East Lothian Local Plan Public Local Inquiry.</p> <p>Landscape Capacity & Visual Impact Appraisal submitted by development consortium for site as part of Finalised East Lothian Local Plan 2005 Public Local Inquiry process.</p>	<p>Ensure that the Development Framework recognises and requires that developers:</p> <p>(i) protect Listed Buildings and their setting, including formal approach to Letham House;</p> <p>(ii) retain views to and from Listed Building as a result of development proposals;</p> <p>(iii) control the form and type of development that can come forward on land adjacent to or near the Listed Buildings;</p> <p>(iv) prepare a Landscape Framework in support of planning application(s), addressing these matters;</p> <p>(v) taking the above into consideration the masterplan tests alternative layout options within the setting of the Listed Buildings to ensure that development protects, and of appropriate, enhances their context and setting.</p>

Issue	Supporting data (where available)	Implications for PPS
Scheduled Ancient Monument and Sites on the Sites and Monument Record	<p>East Lothian Council Development Options Study 2002 and associated Reports comments on the Scheduled Ancient Monument.</p> <p>All relevant correspondence received from Historic Scotland as part of Local Plan preparation process.</p> <p>East Lothian Local Plan 2008 specific comments and requirements set out in relation to impact of site development on the Scheduled Ancient Monument.</p> <p>Wider East Lothian Local Plan 2008 Policy Framework.</p> <p>Masterplan Report for 750 houses submitted by development consortium for site as part of Finalised East Lothian Local Plan Public Local Inquiry.</p> <p>Landscape Capacity & Visual Impact Appraisal submitted by development consortium for site as part of Finalised East Lothian Local Plan 2005 Public Local Inquiry process.</p>	<p>Ensure that the Development Framework recognises and requires that developers:</p> <p>(i) properly establish extent of Scheduled Ancient Monument area;</p> <p>(ii) require the masterplanning process to test alternative layout options where development interfaces with the Scheduled Ancient Monument within the site to ensure that development protects and, if appropriate, enhances their context and setting and consideration of same where in relevant in respect of sites on the Sites and Monuments Record;</p> <p>(iii) undertake full Archaeological Assessment for entire site;</p> <p>(iv) establish and control form of development that may be acceptable on and adjacent to Scheduled Ancient Monument. This may require Scheduled Ancient Monument Consent from Historic Scotland;</p> <p>(v) submit with any planning application(s) a method statement for any development and / or use on or adjacent to Scheduled Ancient Monument, agreed with Historic Scotland</p>
Sustainable Housing and Energy Efficiency	<p>East Lothian Council Development Options Study 2002 and associated Reports.</p> <p>East Lothian Local Plan 2008 specific comments and requirements set out in relation to impact of site development.</p> <p>Wider East Lothian Local Plan 2008 Policy Framework.</p> <p>Building Regulations</p> <p>Area Waste Plan</p> <p>Masterplan Report for 750 houses submitted by development consortium for site as part of Finalised East Lothian Local Plan Public Local Inquiry.</p>	<p>Ensure that the Development Framework recognises and requires that developers:</p> <p>(i) promote high quality design, safe movement, accessibility, mixed uses, enhanced biodiversity, the provision of affordable housing and a range of house types and sizes</p> <p>(ii) promote co-location of different community facilities in close proximity to one another and in accessible locations;</p> <p>(iii) promote location of affordable housing close to</p>

Issue	Supporting data (where available)	Implications for PPS
		<p>transport nodes, community facilities and public transport facilities;</p> <p>(iv) demonstrate that development layout, design and construction takes account of sustainable development;</p> <p>(v) consider a district heating scheme or a combined heat and power plant.</p> <p>(vi) demonstrate the energy efficiency of individual buildings. This could involve use of ground source heat pumps, passive heating, low emissivity, thermally efficient double-glazing, photovoltaic panels, thermal panels or wind energy;</p> <p>(vii) promote reduction, re-use and recycling of materials;</p> <p>(viii) provide an energy efficiency statement in support of planning application demonstrating compliance with energy efficiency standards and sustainable development principles;</p> <p>(viii) provide for separation and recycling of waste in line with Area Waste Plan.</p>
Traffic	<p>East Lothian Council Development Options Study 2002 and associated Reports.</p> <p>East Lothian Local Plan 2008 specific comments and requirements set out in relation to impact of site development.</p> <p>Wider East Lothian Local Plan 2008 Policy Framework.</p> <p>Masterplan Report for 750 houses submitted by development consortium for site as part of Finalised East Lothian Local Plan Public Local Inquiry.</p> <p>Transport Assessment agreed with East Lothian Council and submitted by development consortium as part of Finalised East Lothian Local Plan Public Local Inquiry</p> <p>Draft East Lothian Core Paths Plan</p>	<p>Ensure that the Development Framework recognises and requires that developers:</p> <p>(i) promote public transport, walking and cycling as alternative modes of transport to the private car including Safe Routes to School;</p> <p>(ii) locate facilities so as to be accessible to non-car based modes of transport;</p> <p>(iii) encourage bus penetration of site;</p> <p>(iv) Promote safe pedestrian and cycle access to the town centre and wider countryside including</p>

Issue	Supporting data (where available)	Implications for PPS
		<p>requirements for links to rights of way and core paths;</p> <p>(v) promote 'Home-Zone' principles in line with Council Design Standards for New Residential Streets;</p> <p>(vi) provide an up to date Transport Assessment for the site in support of planning application that takes account of both internal site traffic movement and implications for the rest of the town (including the town centre) of a 750-house development at Letham Mains.</p>

Table 6. SEA Objectives

SEA Topic	SEA Objectives	SEA Indicators
Landscape & Visual Impact	<p>Reduce, remove or mitigate for landscape and visual impact.</p> <p>Identify and protect important landscape features and visual landmarks within and outwith the site.</p>	<p>Inclusion in the Development Framework of a requirement for (i) the retention of views from and across site through building design and layout as part of planning submission and site development</p> <p>(ii) testing of alternatives for the design of the site edges to be tested as part of the planning submission</p>
Water Courses	<p>Protect and enhance all watercourses.</p> <p>Promote habitat enhancement and maintain wildlife corridors.</p> <p>Avoid culverting.</p> <p>Agree SUDS scheme</p> <p>Agree flood risk measures</p> <p>Require general environmental report</p> <p>Require Drainage Impact Assessment</p>	<p>Inclusion in the Development Framework of a requirement for (i) an agreed SUDS and flood risk assessment and production of general environmental report / Drainage Impact Assessment</p> <p>(ii) an assessment of the quality of pre-existing habitat and watercourses, and a requirement to provide new habitat</p> <p>(iii) testing of alternative development layouts in the vicinity of Letham Burn and St Laurence House Burn as part of planning submission</p>
Biodiversity Conservation	<p>Promote biodiversity conservation / enhancement.</p> <p>Protect and promote Letham Burn corridor.</p> <p>Provide formal / informal public open space and full range of natural habitat.</p>	<p>Inclusion in the Development Framework of a requirement for:</p> <p>(i) to agree content of appropriate surveys.</p> <p>(ii) to provide an assessment of the quality of pre-existing habitat and watercourses, and a requirement to provide new habitat</p> <p>(iii) testing of alternative development layouts in the vicinity of Letham Burn and St Laurence House Burn as part of planning submission</p>
Protected Species	<p>Establish existing natural heritage on site including legally protected species, Priority Species, the extent of existing habitats, Species of Conservation Concern and any other relevant items.</p> <p>Protect and enhance protected species habitat during all site development phases.</p>	<p>Inclusion in the Development Framework of a requirement:</p> <p>(i) to put in place protection measures during site development and to monitor species post development;</p> <p>(ii) to provide a sufficient amount and distribution of open</p>

SEA Topic	SEA Objectives	SEA Indicators
	Provision of appropriate open space.	space (iii) testing of alternative development layouts in the vicinity of Letham Burn and St Laurence House Burn as part of planning submission
Listed Buildings	Protect Listed Buildings and their setting	Inclusion in the Development Framework of a requirement to: (i) reach agreement with Historic Scotland on Listed Building matters and to protect Listed Buildings & their setting through development proposals and post development; (ii) test alternative layout options where development interfaces with Listed Buildings.
Scheduled Ancient Monument and sites in Sites and Monuments Record	Properly establish extent of Scheduled Ancient Monument area. Establish and control form of development that may be acceptable on and adjacent to Scheduled Ancient Monument.	Inclusion in the Development Framework of: (i) a requirement to agree with Historic Scotland on Scheduled Ancient Monument matters, including need for Scheduled Ancient Monument Consent for any works; (ii) test alternative layout options where development interfaces with the Scheduled Ancient Monument where relevant sites on the Sites and Monuments Record.
Sustainable Housing / Energy Efficiency	Promote high quality design, safe movement, accessibility, mixed uses, enhanced biodiversity, the provision of affordable housing and range of house types and sizes. Promote co-location of different community facilities in accessible locations. Promote affordable housing close to transport nodes, community facilities and public transport facilities. Ensure that development layout, design and construction take account of sustainable development. Encourage district heating schemes / combined heat and power and energy efficient buildings. Promote reduction, re-use and recycling of materials. Provide for separation and recycling of waste in line with Area Waste Plan.	Inclusion in the Development Framework of appropriate requirements to secure these objectives through planning application(s) and the masterplan to be produced by site developer(s). To require compliance with Scottish Environment Protection Agency requirements.

SEA Topic	SEA Objectives	SEA Indicators
Traffic	<p>Promote public transport, walking and cycling as alternative modes of transport to the private car including Safe Routes to School.</p> <p>Locate facilities so as to be accessible to non-car based modes of transport.</p> <p>Encourage bus penetration of site.</p> <p>Promote safe pedestrian and cycle access to the town centre and wider countryside including requirements for links to rights of way and core paths</p> <p>Promote 'Home-Zone' principles in line with Council Design Standards for Residential Streets.</p>	<p>Inclusion in the Development Framework of a requirement to achieve these objectives by means of a Transport Assessment and incorporation of its recommendations in a subsequent masterplan and planning application(s), all to be produced by site developer(s).</p>

4.0 ASSESSMENT OF ENVIRONMENTAL EFFECTS AND MEASURES ENVISAGED FOR PREVENTION, REDUCTION AND OFFSET OF ANY SIGNIFICANT ADVERSE EFFECTS

Alternatives

4.1 The Development Framework covers a specific site allocated for development by the East Lothian Local Plan 2008. There is therefore no context within which an assessment of alternative sites to provide a location for this development can be undertaken as part of this Environmental Report. In addition, Schedule 3.1 of the Edinburgh & the Lothians Structure Plan 2015 is specific about a requirement for 750 houses at Haddington.

4.2 However, preparation of the East Lothian Local Plan 2008 did involve consideration of alternative locations for development to meet structure plan requirements. In the case of Haddington, the Council considered submissions that the Amisfield area to the east of Haddington should be allocated for residential development. The Council considered that the development of that land would not offer the best planning strategy for the town, particularly for reasons of access, sustainability, landscape and visual impact, flood risk, education, and natural and built heritage (including Conservation Area and Listed Building) impact.

4.3 The scoping report proposed the following alternatives: no site development; site development that ignores environmental considerations, or site development that takes into account environmental considerations and provides mitigation measures. The two former options are not reasonable alternatives as they would not be supported by the development plan. Through SEA Scoping it was highlighted that alternatives should be considered by the masterplan and that this testing should occur where development would be expected to interface with key environmental assets. The PPS now reflects these requirements where relevant.

4.4 The purpose of the Development Framework is to ensure that Haddington is expanded in an appropriate manner taking into account the environmental considerations specific to the area, including how development there may influence the environmental state beyond the site. East Lothian Local Plan Proposal H3 is specific about how development will be brought forward and what are fixed factors and/or must be addressed in the Development Framework. This includes: the expansion of educational infrastructure, the provision and reconfiguration of transportation infrastructure; the range of uses that will be accommodated within the site, including new playing pitches and changing accommodation, public open space and land and/or buildings for local retail/service facilities; enhancing and safeguarding biodiversity and habitat; and a contribution to the extension of the Aubigny Centre.

4.5 The Development Framework therefore has very limited scope to consider reasonable alternative development scenarios that would have any significantly different environmental effects either within the site or outwith it. However, the Development Framework requires that alternative layouts/development footprints are assessed through the masterplanning process in respect of the following:

- layouts that demonstrate how St Laurence House Scheduled Ancient Monument and the Listed Buildings at Letham Mains House and their settings will be preserved and / or enhanced and consideration of same where relevant in respect of sites on the Sites and Monuments Record;

- layouts in the vicinity of Letham Burn and St Laurence House Burn where water voles have been recorded. This is to inform the ways in which potential impacts on this habitat, the ecology and amenity of the area will be conserved and enhanced;
- edge treatments for the boundaries of the site at its northern, eastern, southern and south western boundaries. This testing is to demonstrate how the settlement expansion will be integrated with the townscape and wider landscape and minimise its visual impact. The masterplan will also be expected to bring forward appropriate edge treatments within the site.

Assessment methods

4.6 Comments from the Consultation Authorities (SNH, SEPA and the Scottish Ministers (Historic Scotland)) have been taken into account regarding the methods, scope and level of detail in this Environmental Report.

Table 7. Framework used to assess the Development Framework for Letham Mains Haddington

SEA topic	Letham Mains Development Framework Response
Landscape & Visual Impact	<p>Reduce, remove or mitigate any negative landscape or visual impact through building layout and design.</p> <p>Identify important landscape features within and outwith site and provide mitigation measures.</p> <p>Identify visually important landmarks within and outwith site. Provide appropriate specific measures to protect these views / areas.</p> <p>Identify site character areas and promote development appropriate to these areas.</p> <p>Require Landscape & Visual Impact Assessment and Landscape Framework to be incorporated into required masterplan, and for it to assess alternatives for the design of the site edges aimed at integrating the expansion with the townscape and wider landscape to create positive new urban edges and minimising the developments visual impact.</p>
Watercourses	<p>Protect and enhance all watercourses and ensure no deterioration in the water environment consequent on the development.</p> <p>Promote habitat enhancement and maintain wildlife corridors</p> <p>Requirement to test of alternative development layouts in the vicinity of Letham Burn and St Laurence House Burn, to accompany any planning application to inform the ways in which potential impacts on this habitat, the ecology and amenity of the area will be conserved and enhanced</p> <p>Ensure that all watercourses are incorporated into the proposed development scheme.</p> <p>Avoid culverting</p> <p>Ensure appropriate SUDS scheme is agreed with Scottish Water and Scottish Environment Protection Agency</p> <p>Require Flood Risk Assessment</p> <p>Require Environmental Report in support of planning application for the site</p> <p>Require Drainage Impact Assessment</p>

SEA topic	Letham Mains Development Framework Response
Biodiversity Conservation	<p>Promote biodiversity conservation / enhancement</p> <p>Protect Letham Burn and St Laurence House Burn corridors through provision of linear park, incorporating an appropriate buffer and landscaping proposals to minimise human interference with habitat in appropriate locations</p> <p>Requirement to test of alternative development layouts in the vicinity of Letham Burn and St Laurence House Burn, to accompany any planning application to inform the ways in which potential impacts on this habitat, the ecology and amenity of the area will be conserved and enhanced</p> <p>Provide formal / informal public open space and full range of natural habitats appropriate to site</p> <p>Incorporate East Lothian Council Biodiversity Habitat Plan for Urban Areas and East Lothian Biodiversity Action Plan requirements</p> <p>Need for Landscape Framework to be integrated with open space and SUDS corridors to link and extend such networks in the area</p> <p>Require biodiversity habitat and species survey</p> <p>Require Method Statement for Letham and St Laurence House Burns</p> <p>Require Environmental Report in support of planning application for the site</p>
Protected Species	<p>Require biodiversity habitat survey of site</p> <p>Require Method Statement for enhancement of the Letham and St Laurence House Burns</p> <p>Require Environmental Report in support of planning application for the site</p> <p>Need to protect / enhance protected species habitat during site development</p> <p>Requirement to test of alternative development layouts in the vicinity of Letham Burn and St Laurence House Burn, to accompany any planning application to inform the ways in which potential impacts on this habitat, the ecology and amenity of the area will be conserved and enhanced</p> <p>Provision of public open space and creation of linear park areas along Letham and St Laurence House Burns. Ensure SUDS design that helps water vole habitats</p>

SEA topic	Letham Mains Development Framework Response
Listed Buildings	<p>Require the masterplaning process to test alternative layout options where development interfaces with Listed Buildings within the site to ensure that development protects and, if appropriate, enhances their context and setting</p> <p>Retain key views to and from Listed Building</p> <p>Control form and type of development on land adjacent to Listed Buildings to secure the above and to require Landscape Framework for site to do same</p>
Scheduled Ancient Monument and sites on the Sites and Monument Record	<p>Establish extent of Scheduled area</p> <p>Require full Archaeological Assessment for entire site</p> <p>Require the masterplaning process to test alternative layout options where development interfaces with the Scheduled Ancient Monument within the site to ensure that development protects and, if appropriate, enhances their context and setting and consideration of same where in relevant in respect of sites on the Sites and Monuments Record;</p> <p>Require agreed method statement for any development</p>
Sustainable Development / Energy Efficiency	<p>Promote high quality design, safe movement, accessibility, mixed uses, enhanced biodiversity and provision of affordable housing and a range of house types and sizes</p> <p>Ensure developers demonstrate that development layout, design and construction takes account of sustainable development</p> <p>Encourage district heating schemes or a combined heat and power</p> <p>Ensure individual buildings demonstrate energy efficiency</p> <p>Promote reduction, re-use and recycling of materials</p> <p>Require energy efficiency statement in support of planning application</p> <p>Comply with Area Waste Plan</p>

SEA topic	Letham Mains Development Framework Response
Traffic	<p>Promote public transport, walking and cycling including Safe Routes to School</p> <p>Locate facilities to be accessible to non-car based modes of transport</p> <p>Promote safe pedestrian and cycle access to the town centre and wider countryside including requirements for links to rights of way and core paths</p> <p>Promote 'Home-Zone' principles in line with Council Design Standards for New Housing Areas</p> <p>Require preparation of Transport Assessment for site</p>

Table 7: Summary of assessment findings

SEA topic	Likely Environmental Effects of Letham Mains Development Framework
Landscape & Visual Impact	Neutral
Watercourses	Neutral
Biodiversity Conservation	Positive
Protected Species	Positive
Listed Buildings	Neutral
Scheduled Ancient Monument and sites on the Sites and Monument Record	Potentially Negative
Sustainable Development and Energy Efficiency	Positive
Transport	Positive

4.5 It is anticipated that site development will start in 2012 / 2013 allowing for environmental measures to be agreed and put in place in the interim period. In the period to 2012 it is expected that existing land uses will continue.

4.6 The Development Framework identifies and, where appropriate, requires further information on significant environmental factors both within and outwith the site. It puts in place appropriate protection and mitigation measures that recognise the importance of these resources. It places specific requirements upon developers in relation to the design, location, orientation, scale and massing of buildings, provision of formal and informal public open space and movement routes through the site to ensure that site development respects its

surroundings and minimises impact on the natural and built environment. It actively promotes the enhancement of natural features and habitats wherever possible. Through the identification of character areas the Development Framework avoids homogenous development. It encourages sustainable development and energy efficiency in all aspects of site development including construction techniques, materials used and the promotion of energy efficiency measures from site down to individual plot level.

Assessment of alternatives - cumulative effects

4.7 There are no anticipated cumulative effects consequent upon the preparation of this Development Framework. There are no alternatives to preparing a Development Framework, as it is a requirement of the East Lothian Local Plan 2008. Its function is to ensure that any adverse environmental impacts associated with the development of the land at Letham Mains, as provided for in the Local Plan, are addressed.

4.8 It is the land's allocation in the East Lothian Local Plan 2008 that determines the location, extent and broad nature of the proposed development. The PPS details the requirements of East Lothian Council, as planning authority, for the development of the allocated area. It identifies potential environmental impacts and address how these should be mitigated. In guiding the development of land at Letham Mains, the Framework has an impact on the environment, but its outcomes are intended to be neutral or positive ones.

4.9 Discussions are ongoing between the Council the applicant and Consultation Authorities on the development of the Letham Mains site. These include Historic Scotland on the Scheduled Ancient Monument Listed Building, Scottish Environment Protection Agency on drainage / flooding issues, Scottish Water on a preferred drainage solution and Scottish Natural Heritage on the protection of water voles along the line of the Letham Burn, as well as other matters relating to biodiversity and landscape.

5.0 Monitoring

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. 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*".

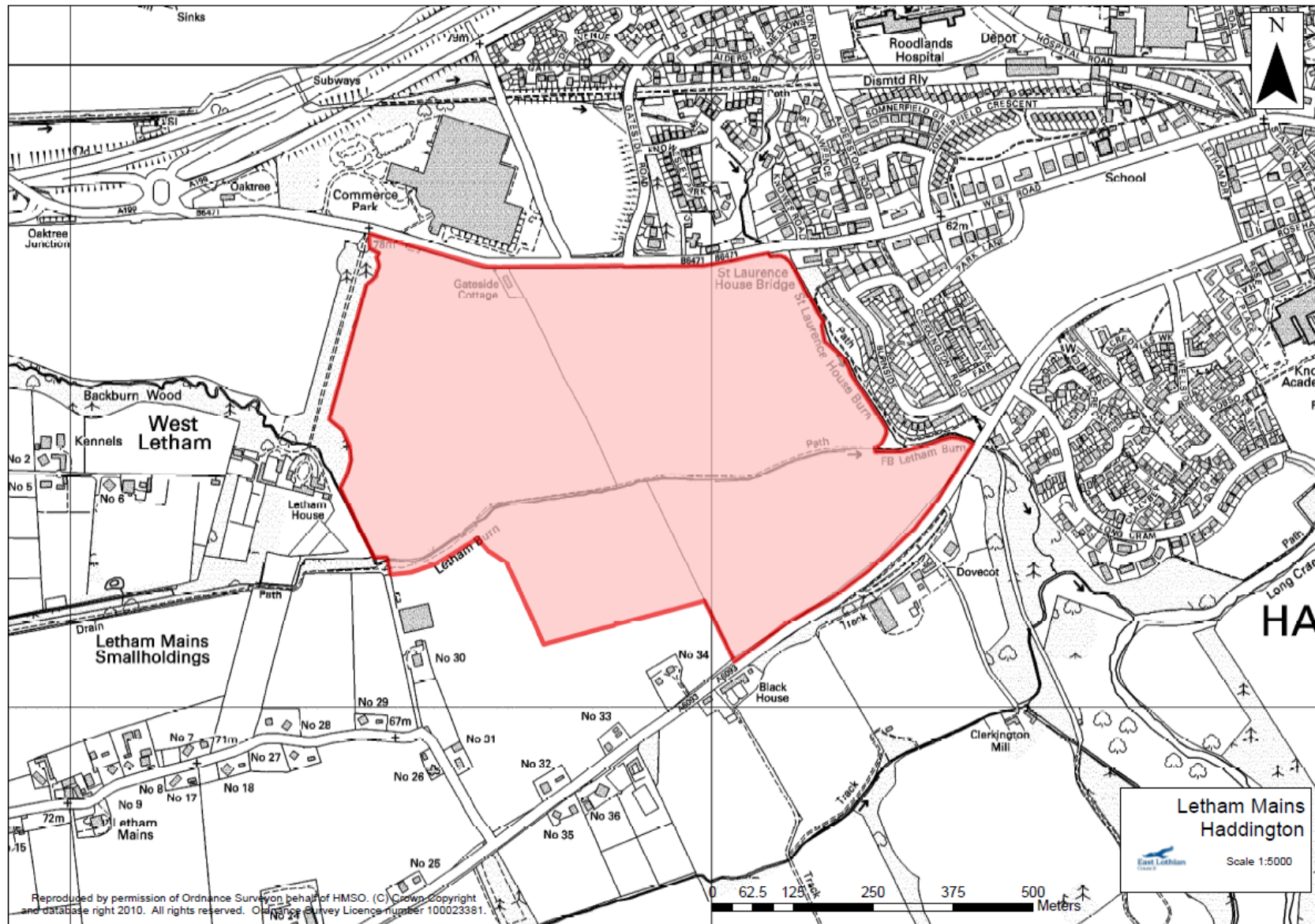
5.2 Under Section 19 of The Environmental Assessment Act (Scotland) 2005, the Responsible Authority is duty bound to monitor the significant environmental effects that occur as a result of implementing the qualifying plan, programme or strategy. In this instance, it is the responsibility of East Lothian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

5.3 The monitoring proposed in the post-adoption SEA Statement will be undertaken at each stage in the process of submission and determination of statutory planning and other consents. This will consider if the requirements of the approved Development Framework have been identified and complied with. Specific monitoring activities are outlined in Table 10 below.

Table 10. SEA Monitoring Activities

What is being monitored	Data source	Summary of proposed remedial action (if information is available)	Timescale and responsibility
Environment	General Environment Report	Not yet fully known	At time of submission of planning application/Applicant
Landscape and Visual Impacts	Landscape and Visual Impact Assessment and Landscape Framework	Not yet fully known	At time of submission of planning application/Applicant
Water and Drainage	Flood Risk Assessment and Drainage Impact Assessment	Not yet fully known	At time of submission of planning application/Applicant
Biodiversity and Natural Heritage	Biodiversity Habitat Survey, Method Statement for Letham and St Laurence House Burns	Not yet fully known	At time of submission of planning application/Applicant
Historic Assets	Archaeological Assessment	Not yet fully known	At time of submission of planning application/Applicant
Energy Efficiency	Energy Efficiency Statement	Not yet fully known	At time of submission of planning application/Applicant
Transport	Transport Assessment	Not yet fully known	At time of submission of planning application/Applicant

Appendix A



Appendix B

