

From: [John Handley](#)
To: [wlldp](#)
Cc: [REDACTED]
Subject: WLPLDP - Proposed Housing Development on Land at Hartwood Road, West Calder
Date: 10 November 2015 18:15:22
Attachments: [REDACTED] - [Representation on Proposed LDP - 10.11.15.pdf](#)
[REDACTED] - [WLLDP MIR - Supporting Statement - Final - 09.10.14.pdf](#)
Importance: High

Dear Sirs,

**West Lothian Local Development Plan – Proposed Plan
Submission on behalf of [REDACTED]
Proposed Housing Development on Land at Hartwood Road, West Calder
MIR Site Ref: LATE-0009**

We refer to your recent correspondence inviting submissions on the West Lothian Proposed LDP before 22 November 2015.

We can confirm that we have today submitted a representation on behalf of our client, [REDACTED] requesting the allocation of a 1.05 hectare site at Hartwood Road, West Calder as a new housing proposal in the Proposed LDP.

The site was assessed by the Council at the MIR stage and given the reference MIR Site Ref: Late – 0009.

On behalf of our client, we would therefore request that the merits and advantages of this small site are reconsidered, and the site removed from its current countryside designation and allocated as a specific housing development opportunity with capacity for around 10 - 12 units in the new LDP.

As requested, we have made our submission via your on-line consultation portal (ref: 0f65928).

However, and for completeness, we have also enclosed with this email a summary of our representation.

We would also ask that the information set out in the attached Supporting Planning Statement (which was submitted in response to the MIR in October 2014) is included as part of our representation on the Proposed LDP and is forwarded to the Examination Reporter in support of our representation.

We trust this is acceptable, and would be grateful if you would acknowledge safe receipt of our on-line submission and this follow-up email.

We look forward to hearing from you.

Kind regards

John Handley
Director

John Handley Associates Ltd
Chartered Town Planning Consultants
1 St Colme Street
Edinburgh
EH3 6AA



West Lothian Local Development Plan – Proposed Plan

Submission on behalf of [REDACTED]

Proposed Housing Development on Land at Hartwood Road, West Calder

MIR Site Ref: LATE-0009

This representation is made on behalf of landowner and developer [REDACTED].

It is submitted in response to the Council's failure to allocate a 1.05 hectare site at Hartwood Road, West Calder as a new housing proposal in the Proposed LDP.

The site was assessed by the Council at the MIR stage and given the reference MIR Site Ref: Late – 0009.

On behalf of our client, we would therefore request that the merits and advantages of this small site are reconsidered, and the site removed from its current countryside designation and allocated as a specific housing development opportunity with capacity for around 10 - 12 units in the new LDP.

Full details of the site are set out in the attached Supporting Planning Statement which was submitted in response to the MIR in October 2014.

Development of the site at Hartwood Road would enable West Lothian Council to comply with the policy requirements of SPP and the Government's specific objective to provide a generous supply of housing land. There is a need to maintain an effective 5 year housing land supply at all times, and the site at Hartwood Road, while small scale, is an effective and deliverable site and can contribute around 10 to 12 units in the short term to the housing land supply.

As noted in the Council's SEA document, the site is a logical extension to the settlement and would round off the existing settlement in a sustainable, viable and effective manner.

The site can be developed without any apparent physical or environmental constraints. In particular, the proposed residential development could be contained comfortably into the landscape, permitting small but high quality development in terms of design, layout and landscaping. The development site is not subject to any specific countryside or landscape designation or protection.

New residential development at this location would not only provide a desirable location to live but would also represent a sustainable approach to development, which takes advantage of existing infrastructure capacity and the accessibility benefits of West Calder.

Further new housing of the type being proposed for this site would help sustain the local community by providing additional variety and choice of housing for potential house buyers in West Lothian.

The allocation and development of the Hartwood Road site for new housing would therefore help provide a different housing mix through the allocation of sites for private sector investment and assist in achieving a more balanced community. In doing so, this would help to contribute towards the Council's Regeneration Strategy which seeks to address a number of key outcomes of reducing inequality, improving health and well-being, increasing employment opportunities, improving education and skills and carrying out environmental improvements.

In conclusion, and on behalf of our client, we would therefore request that the particular merits and advantages of this small site at Hartwood Road are reconsidered by West Lothian Council in light of the additional information submitted with this representation.

As a result, the site should be removed from its current countryside designation and allocated as a specific housing development opportunity with capacity for around 10 to 12 units in the new Local Development Plan.

This proposed allocation of our client's site in the new Local Development Plan would provide scope for a low density housing development in a suitable and accessible location. This would maximise the benefits and advantages of the site's location, and effectively "round-off" development in this particular area.

Full details of the site are set out in the attached Supporting Planning Statement which was submitted in response to the MIR in October 2014.

JOHN HANDLEY ASSOCIATES LTD

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West Lothian Local Development Plan Main Issues Report 2014

Proposed Housing Development
MIR Site Ref: LATE-0009
Land at Hartwood Road

Supporting Planning Statement

Submission on behalf of:



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October 2014

**West Lothian Local Development Plan
Main Issues Report (2014) – Response to Question 15**

**Proposed Housing Development
Land at Hartwood Road, West Calder
MIR Site Ref: LATE-0009**



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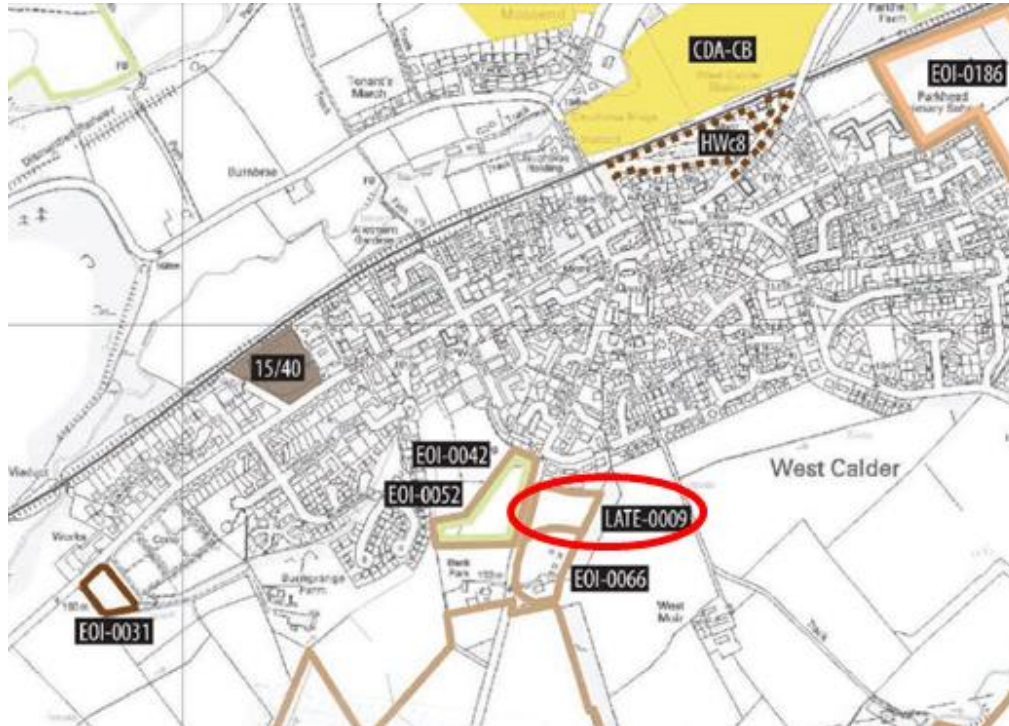
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1.0 Introduction

- 1.1 This Supporting Planning Statement has been prepared by Chartered Town Planning Consultants, John Handley Associates Ltd, on behalf of landowner and developer [REDACTED]. It is submitted in response to the Council's assessment of a 1.05 hectare site at Hartwood Road, West Calder in the Main Issues Report (MIR Site Ref: Late – 0009), and requests that the 'Not Preferred Site' status in the Main Issues Report is reassessed by the Council, with the site allocated in the Proposed Local Development Plan as a new housing development opportunity with capacity for around 10 - 12 units.
- 1.2 The purpose of this Planning Statement is to provide West Lothian Council with an overview of the site's potential and its planning merits in the lead up to the preparation of the new West Lothian Local Development Plan (WLLDP) which is scheduled to be issued as a Proposed Plan in 2015.
- 1.3 More specifically, this Statement responds to the publication of the WLLDP Main Issues Report and the invitation to submit comments to the Council in advance of the publication of the Proposed Plan.
- 1.4 Whilst we have reviewed the full MIR, and are aware of the range of separate Consultation Questions being posed by the Council, this submission is restricted to matters relating to Main Issue 3 – Housing growth, delivery and sustainable housing locations, and Question 15 of the Main Issue Report Questionnaire.
- 1.5 Question 15 asks "Do you agree with the 'Preferred' Strategy for housing growth in West Lothian?" [REDACTED] does not agree with the Preferred Strategy for housing growth in West Lothian insofar as it relates to West Calder and the non-allocation of land for residential development at Hartwood Road.
- 1.6 On this basis, and in specific response to Questions 15 of the Main Issues Report, this Supporting Planning Statement expands upon submissions made at the earlier call for sites stage, and objects to the Council's 'Not Preferred' status and the non-allocation of the site at Hartwood Road for residential development in the emerging Local Development Plan.
- 1.7 **On behalf of [REDACTED] we would therefore request that the merits and advantages of this small site are reconsidered in light of the information set out in this Statement, and the site removed from its current countryside designation and allocated as a specific housing development opportunity with capacity for around 10 - 12 units in the new LDP.**

2.0 Main Issues Report

- 2.1 The site is identified in the MIR as *Site Late 0009 – Land southwest of West Calder*. The site is identified in the extract from the proposals map below:



Extract from WLLDP MIR Proposals Map 6 with site highlighted in red

- 2.2 The site at Hartwood Road is not identified as a preferred site for development in the Main Issues Report. The MIR considered that the site had the capacity for 20 residential units.
- 2.3 However it is the landowner's intention that the site would deliver 10 to 12 units on 0.25 acre plots. This would mirror the scale, layout and development of the small housing development to the north of the site (nos 36 – 46 Hartwood Road) which was built by ██████ in the 1990s and has proved an attractive and popular housing development. The impact of this proposed lower density development of the site has therefore not been considered by the Council and should therefore be reassessed in relation to what would be delivered on site at Hartwood Road.
- 2.4 A small allocation at Hartwood Road is considered to be deliverable in the short term and can contribute to West Lothian Council's aims and objectives for West Calder. The site can also make a small but effective contribution to the West Lothian housing land supply and meet the needs of a particular section of the local community.

2.5 The West Calder and Harburn Settlement Statement within the MIR considers issues within West Calder; infrastructure considerations; spatial strategy considerations; and priorities for the town.

2.6 An extract from the West Calder and Harburn Settlement Statement is detailed below:

Issues
Promote and maintain the employment base, tackle areas of social deprivation
Infrastructure considerations
The town is served by Parkhead Primary School, West Calder, St. Marys RC Primary, Polbeth and West Calder High School and St. Kentigern's High School, Blackburn.
Spatial strategy considerations
The availability of infrastructure, strategic location, and existing facilities make the town an attractive option for future development.
Priorities
Support and maintain existing local amenities and services; investigate measures to address traffic issues; address issues of social deprivation; provide local employment opportunities; provide community facilities to support anticipated levels of development associated with the Mossend Core Development Area and developments for housing granted at Cleugh Brae, also part of the CDA; upgrade site to the south of the community centre to provide a neighbourhood park; review park provision in the town and footpath links; review settlement envelope.

2.7 The allocation and development of the Hartwood Road site for new housing would help provide a different housing mix through the allocation of sites for private sector investment and assist in achieving a more balanced community. In doing so, this would help to contribute towards the Council's emerging Regeneration Strategy which seeks to address a number of key outcomes of reducing inequality, improving health and well-being, increasing employment opportunities, improving education and skills and carrying out environmental improvements.

3.0 Policy Context

National Planning Framework 3 (NPF3)

- 3.1 The third National Planning Framework (NPF3) provides the statutory framework for Scotland's long-term spatial development. It sets out the Scottish Government's spatial development priorities for the next 20 to 30 years. Planning authorities are required to take the Framework into account when preparing development plans and it is a material consideration in the determination of planning applications.
- 3.2 NPF3 confirms that the Scottish Government's central purpose is to create a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth. To achieve this, the Government Economic Strategy aims to share the benefits of growth by encouraging economic activity and investment across all of Scotland's communities, whilst protecting our natural and cultural assets.
- 3.3 In terms of the vision for Scotland, NPF3 confirms that this includes a vision where Scotland is a successful, sustainable place with a growing economy which provides opportunities that are more fairly distributed between, and within, all communities. The objective is to provide high quality, vibrant and sustainable places with enough, good quality homes. Our living environments foster better health and we have reduced spatial inequalities in well-being. There is a fair distribution of opportunities in cities, towns and rural areas, reflecting the diversity and strengths of our unique people and places.
- 3.4 Section 2 of the NPF3 sets out the Government's strategy to achieve the vision of "a *successful, sustainable place*". The strategy is to ensure that all parts of Scotland make best use of their assets to build a sustainable future, and to create high quality, diverse and sustainable places that promote well-being and attract investment. The NPF notes that the financial climate has reduced the amount of new housing built in recent years, but the Scottish Government is committed to a significant increase in house building to ensure housing requirements are met across the country.
- 3.5 NPF3 encourages high quality, diverse and sustainable developments that promote well-being and attract investment. It confirms that there is a need for a significant increase in house building to ensure housing requirements are met across the country and more ambitious and imaginative planning is needed to ensure a generous and effective supply of housing land.

- 3.6 The allocation of the site at Hartwood Road for small scale residential development in the emerging Local Development Plan would accord with the aims of NPF3 through the provision of new housing land in an accessible and sustainable location.

Scottish Planning Policy

- 3.7 The updated Scottish Planning Policy (SPP) was published alongside the new NPF in June 2014 and sets out the policy that will help to deliver the objectives of NPF3. The SPP is a statement of Scottish Government policy on how nationally important land use planning matters should be addressed across the country.
- 3.8 It is a material consideration that carries significant weight in the preparation of development plans and the determination of planning applications and appeals.
- 3.9 The new SPP confirms that the Scottish Government's central purpose is to focus on creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth. Sustainable economic growth is defined as: *"Building a dynamic and growing economy that will provide prosperity and opportunities for all, while ensuring that future generations can enjoy a better quality of life too"*.
- 3.10 Paragraph 15 explains that by locating the right development in the right place, planning can provide opportunities for people to make sustainable choices and improve their quality of life. Well-planned places promote well-being, a sense of identity and pride, and greater opportunities for social interaction. Delivering high-quality buildings, infrastructure and spaces in the right locations helps provide choice over where to live and style of home, choice as to how to access amenities and services and choice to live more active, engaged, independent and healthy lifestyles.
- 3.11 The new SPP confirms the introduction of a presumption in favour of development that contributes to sustainable development. SPP explains that the planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term.

- 3.12 SPP explains that policies and decisions should be guided by a number of principles, including:
- giving due weight to net economic benefit;
 - responding to economic issues, challenges and opportunities, as outlined in local economic strategies;
 - supporting good design and the six qualities of successful places;
 - making efficient use of existing capacities of land, buildings and infrastructure including supporting town centre and regeneration priorities;
 - supporting delivery of accessible housing, business, retailing and leisure development;
- 3.13 In relation to housing development SPP sets out the Government's approach towards "Enabling Delivery of New Homes" and confirms the need to facilitate new housing development, particularly in areas within our cities network where there is continuing pressure for growth. SPP also confirms that house building makes an important contribution to the economy, and planning can help to address the challenges facing the housing sector by providing a positive and flexible approach to development.
- 3.14 SPP confirms that the planning system should: identify a generous supply of land; maintain at least a 5-year supply of effective housing land at all times; and enable provision of a range of attractive, well-designed, energy efficient, good quality housing, contributing to the creation of successful and sustainable places. IN addition SPP confirms the local development plans should indicate the number of new homes to be built over the plan period, and this figure should be increased by a margin of 10 to 20% in order to ensure that a generous supply of land for housing is provided. Local development plans should provide for a minimum of 5 years effective land supply at all times.
- 3.15 SPP explains that planning authorities and developers should work together to ensure a continuing supply of effective land and to deliver housing, taking a flexible and realistic approach.
- 3.16 The proposals put forward for Hartwood Road will provide an element of residential development to meet a small part of West Lothian's housing requirement and would contribute to the Council's Priorities for West Calder. The allocation of the site at Hartwood Road is consistent with the Scottish Government Guidance provided through NPF3 and SPP.

SESplan Strategic Development Plan

- 3.17 The South East Scotland Strategic Development Plan (SESplan) was approved by Scottish Ministers in June 2013. The Strategic Development Plan states that South East Scotland is the main growth area and the key driver of the Scottish economy.
- 3.18 SESplan has a clear aim of promoting sustainable development, whilst creating opportunities for satisfying the full range of housing needs. The Vision set out in SESplan includes the aims to:
- Set out a strategy to enable delivery of housing requirements to support growth and meet housing need and demand in the most sustainable locations.
 - Integrate land use and sustainable modes of transport, reduce the need to travel and cut carbon emissions by steering new development to the most sustainable locations.
 - Conserve and enhance the natural and built environment.
- 3.19 In terms of spatial strategy, the SESplan identifies 13 strategic development areas (“SDAs”). West Calder falls within the West Lothian SDA. The SESplan confirms that within this SDA there is a need for a significant level of new homes. The SESplan confirms that such allocations will be focused in sustainable locations where infrastructure is either available or can be provided and in locations where there are no environmental constraints. The allocation of the Hartwood Road site therefore accords with the spatial strategy of SESplan.
- 3.20 SESplan also confirms the need for a generous supply of housing land to be available at all times. The allocation of land for residential development at Hartwood Road would help to contribute to the housing land supply in West Lothian.
- 3.21 SESplan Policy 6 requires that:

“Each planning authority in the SESplan area shall maintain a five years’ effective housing land supply at all times. The scale of this supply shall derive from the housing requirements for each Local Development Plan area identified through the supplementary guidance provided for by Policy 5. For this purpose planning authorities may grant planning permission for the earlier development of sites which are allocated or phased for a later period in the Local Development Plan.”

3.22 Sites such as Hartwood Road can make an effective contribution to the five year housing land supply in West Lothian. The nature of the site makes it deliverable within the short term as it is small scale in nature, and capable of early delivery without any major infrastructure requirements.

3.23 SESplan Policy 7 also confirms that:

“Sites for greenfield housing development proposals either within or outwith the identified Strategic Development Areas may be allocated in Local Development Plans....., subject to satisfying each of the following criteria:

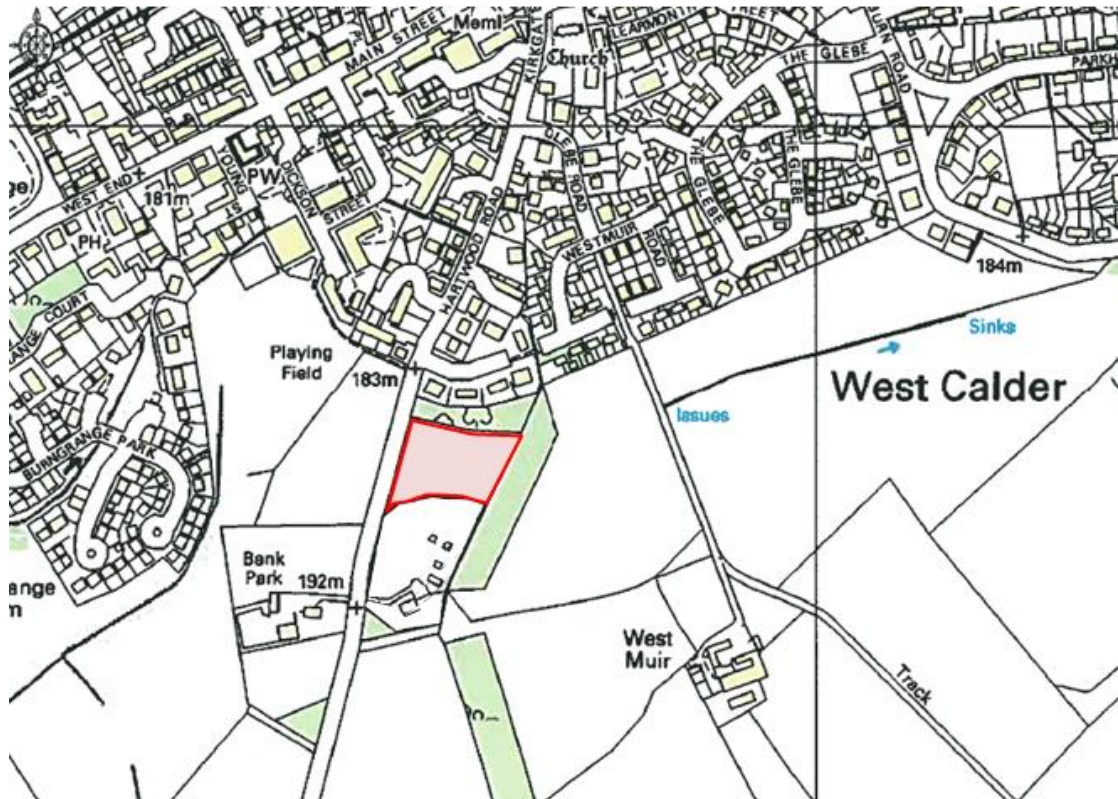
- a. The development will be in keeping with the character of the settlement and local area;*
- b. The development will not undermine green belt objectives; and*
- c. Any additional infrastructure required as a result of the development is either committed or to be funded by the developer”.*

3.24 The Hartwood Road site meets all of these criteria in that the small scale of development would be in keeping with the character of the settlement and local area; the site is not within the green belt; and (as confirmed in the MIR) there is available infrastructure capacity in West Calder to accommodate the proposed development of c. 10 to 12 units. The allocation of this site in the new LDP would therefore accord with Policy 7 of the SESplan.

3.25 Sites such as that at Hartwood Road can therefore make an effective contribution to the five year housing land supply in West Lothian. The nature of the site makes it deliverable within the short term.

4.0 Site & Surrounding Area

- 4.1 The objection site is situated on the southern edge of West Calder, on the eastern side of Hartwood Road. The site lies outwith, but immediately adjacent to the existing settlement boundary and could be viewed as a logical and natural settlement extension, suitable for low density housing.
- 4.2 The site extends to 1.05 hectares and is used for rough grazing. To the south there is a further field and to the east there is a tree belt and agricultural fields and to the west lies Hartwood Road which connects this part of West Calder to the town centre and train station.
- 4.3 The mature tree belt to the east forms a strong defensible boundary and its continuation along the southern boundary creates a strong and enhanced physical boundary for the settlement.
- 4.4 Development would be contained comfortably within the landscape and would balance development to the west. The site is fully effective and its allocation would be in keeping with the settlement's scale and character. The site would add to the range and choice of housing available within West Calder.
- 4.5 The site is suitable for housing and is well related to the town and its range of facilities, services, education and transport infrastructure. The site is within walking distance of the railway station, bus routes and local facilities and there are no water or sewage constraints. The site benefits from strong defensible boundaries and its inclusion within the settlement would represent a logical boundary extension for the built up area.
- 4.6 The location of the site and its surrounding area are confirmed in the location plan and aerial and site photographs set out below.



Site Location Plan



Aerial Photograph showing location and relationship to existing settlement



Aerial Photograph showing location of site and relationship to existing housing



View of site looking north east from Hartwood Road



Existing housing development immediately to north of site

5.0 Proposed Development of Site

- 5.1 As noted above, the site is being proposed for the development of around 10 to 12 units on large 0.25 acre plots, which would mirror the scale, layout and development of the small housing development to the north of the site (nos 36 – 46 Hartwood Road) which was built by [REDACTED] in the 1990s and has proved an attractive and popular housing development.
- 5.2 As the Local Development Plan emerges and a future planning application is progressed, a masterplan would be prepared for the site to demonstrate how the proposed small scale residential development would be compatible with the immediately adjacent housing and would be of a scale, density and character in keeping with the local area.
- 5.3 The proposed development would reflect best practice in the planning and design of new housing development. This would be a holistic approach that integrates urban design, land use, housing, transportation, ecology, landscape, conservation and energy efficiency.
- 5.4 The proposed development at Hartwood Road, while small scale, would provide a high quality, sustainable development which is planned and developed in a coordinated and integrated manner. The development would take advantage and maximise opportunities to integrate the new development with the existing settlement and set out a landscape framework which will enhance the setting of West Calder at this location.
- 5.5 The site could be developed with no apparent physical or environmental constraints. It can also be effectively and readily serviced and there are no constraints to its immediate development. Owing to the nature of the site, it is considered that its development could be contained comfortably into the landscape, permitting a small but high quality development in terms of design, layout and landscaping.
- 5.6 The development of this site would not only provide a desirable location to live but would also represent a sustainable approach to development, which takes advantage of existing and proposed new infrastructure. New housing would also help sustain the local community of West Calder and help extend services and facilities.

- 5.7 The location and nature of the site, including its ability to be accessed and its relationship with the existing residential development, confirm it as entirely suitable for private house building and its development would help provide for a variety and choice of locations for potential new house buyers in West Lothian.
- 5.8 The following section sets out the effectiveness of the site in relation to PAN 2/2010 and demonstrates that the site can be delivered within a short term timescale.

6.0 Site Effectiveness

6.1 The tests of effectiveness for housing allocations are set out in paragraph 55 of Planning Advice Note 2/2010 – Affordable Housing and Housing Land Audits. These are as follows:

- ownership: the site is in the ownership or control of a party which can be expected to develop it or to release it for development. Where a site is in the ownership of a local authority or other public body, it should be included only where it is part of a programme of land disposal;
- physical: the site, or relevant part of it, is free from constraints related to slope, aspect, flood risk, ground stability or vehicular access which would preclude its development. Where there is a solid commitment to removing the constraints in time to allow development in the period under consideration, or the market is strong enough to fund the remedial work required, the site should be included in the effective land supply;
- contamination: previous use has not resulted in contamination of the site or, if it has, commitments have been made which would allow it to be developed to provide marketable housing;
- deficit funding: any public funding required to make residential development economically viable is committed by the public bodies concerned;
- marketability: the site, or a relevant part of it, can be developed in the period under consideration;
- infrastructure: the site is either free of infrastructure constraints, or any required infrastructure can be provided realistically by the developer or another party to allow development; and
- land use: housing is the sole preferred use of the land in planning terms, or if housing is one of a range of possible uses other factors such as ownership and marketability point to housing being a realistic option.

6.2 It is noted that paragraph 55 of the PAN states that: *“To assess a site or a portion of a site as being effective, it must be demonstrated that within the five-year period beyond the date of the audit the site can be developed for housing (i.e. residential units can be completed and available for occupation), and will be free of constraints”.*

- 6.3 Addressing each of the above in turn, with regards to ownership it is confirmed that the site is in the ownership of a party that is willing, and intends, to release the land for residential development and associated uses during the period of the Local Development Plan
- 6.4 With regards to the PAN requirements on physical constraints it is confirmed that there are no physical constraints of the nature listed in the PAN affecting the site.
- 6.5 There are no known contamination issues within the site nor is there any history of such.
- 6.6 There are no deficit funding issues with regard to the site. It is wholly in private ownership.
- 6.7 The site is marketable and the small scale development proposed would be a desirable addition to the settlement in a popular and attractive location. Subject to a grant of planning permission, completions on the site would be delivered within the LDP period and the site is therefore considered effective in terms of Paragraph 55 of the PAN.
- 6.8 The landowner confirms that housing is the preferred land use of the land in planning terms. The site could accommodate approximately 12 dwellings.
- 6.9 There are no known environmental issues that would prevent the site from delivering development over the plan period. The site comprises agricultural fields and is not covered by any environmental designation.
- 6.10 There are no known infrastructure constraints that would affect the development of the site for residential use. According to information provided by Scottish Water there is sufficient capacity in the local wastewater treatment works and in the local water treatment works to serve the site. There are no off site road capacity issues that would prevent development of the site for the small scale of development being proposed.
- 6.11 In relation to education capacity, it is considered that the small scale of development being proposed at Hartwood Road will generate a very limited number of additional school pupils which can be accommodated by existing or planned education capacity in the local area. Education provision should not therefore be regarded as an obstacle to the effectiveness of the site at Hartwood Road.

7.0 Recent Planning History

- 7.0 This site at Hartwood Road was first promoted for residential development through the previous Local Plan. At that time it was concluded by the Council that allocation of the site was not required for development due to other strategic land releases in the area, and notably the Mossend CDA.
- 7.1 The site was, however, submitted as a candidate site during the West Lothian Local Development Plan 'Call for Sites' exercise in May 2011.
- 7.2 The site has therefore been assessed by West Lothian Council in response to the Call for Sites exercise and has been also been subject to Strategic Environmental Assessment. As a result of these assessments, West Lothian Council have decided not to support the allocation of this site for residential development in the emerging Local Development Plan with a *'Not Preferred Site'* status in the Main Issues Report.
- 7.3 However, and as noted above, it is the landowner's intention that the site would only deliver around 10 to 12 units and not the 20 units suggested in the Council's MIR assessments. The impact of this proposed lower density development of the site has therefore not been considered by the Council and should therefore be reassessed in relation to what would be delivered on site at Hartwood Road.
- 7.4 We have reviewed and responded to the Council's assessment of the site in the following sections of this Supporting Planning Statement.

8.0 West Lothian Council Site Assessment

Response to Call for Sites Exercise

8.1 The Council's conclusions in response to the call for sites exercise state:

“Development of the site is not in accordance with the council's preferred development strategy which supports development within the core development areas and other strategic locations.

Generally, there are other more suitable sites available for development that can be brought forward to support development requirements. The Strategic Development Plan gives priority to redeveloping brownfield land in advance of greenfield sites such as this.

Development of this site would be visually and environmentally intrusive and detract from the rural character of the site and its surroundings.

Development could be prejudicial to the continued development of the CDA which the Council is committed to supporting.

There are concerns regarding access via Hartwood Road.

Though this site is not shown to be at risk of flooding on the flood hazard maps it is known from local knowledge that runoff from the site is a significant problem. There is also a history of flooding due to short-term lack of capacity in the public sewer. There would therefore be a requirement for a Flood Risk Assessment and Drainage Assessment to be submitted and for developers to satisfactorily demonstrate how this site could be developed in the context of the aforementioned difficulties

There is no education capacity available to support development of the site”

8.2 As stated previously the site was submitted as a candidate site through the Call for Sites exercise, a number of units was not specified for the site at that time. The council have assessed the site as being suitable for 20 units, however it is not [REDACTED] intention that the site would be suitable for that number of dwellings and instead the site is suitable for the development of around 10 to 12 units on large 0.25 acre plots.

8.3 As can be seen from the table below, the conclusions arrived at by West Lothian Council are not fully reflective of the consultation responses received nor of the Strategic Environmental Assessment conclusions regarding the development of the site.

8.4 Consultation responses have been received by West Lothian Council in response to the Call for Sites submission. The issues raised during the consultation process are detailed and addressed below.

Consultee	Issues Raised	Landowner Response
British Airports Authority (BAA)	The site does not fall within the safeguarding consultation zone	
Coal Authority	Coal resources are present within West Lothian, and the area has been subjected to coal mining which will have left a legacy. In terms of the site assessments and any eventual site allocations, it would be prudent to include a criterion which assessed coal mining data.	Coal mining would be addressed as part of any future planning application package
Historic Scotland	No specific comments.	
HSE (Health and Safety Executive)	No specific comments.	
NHS - Lothian	Settlement wide review : Primary care requirements : West Calder : new facility should also cater for Polbeth CDA development	It is not anticipated that the scale of development will impact greatly on the NHS services provided in the area, however further dialogue could be had if appropriate and required.
Scottish Enterprise	No specific issues or concerns.	
Scottish Water	In terms of water supply the site is served by the PATESHILL water treatment works (WTW) where there is sufficient capacity. In terms of waste water treatment the site is served by the AVSE PFI EAST CALDER waste water treatment works (WWTW) where there is sufficient capacity.	Scottish Water would be further consulted during the planning application process.
SEPA - Flooding	SEPA have nearby records of 12 homes being affected in 2001 by a surcharging culvert. Allocation not located adjacent to watercourse	The issues with the Surcharging culvert have since been resolved through the development of the site to the north and there are no known drainage or flooding issues associated with the site.
SEPA – Water Environment	Standard SUDs sufficient to prevent deterioration of status and there is no requirement for a buffer strip and there are no restoration opportunities.	Appropriate suds would be designed as part of a future development of the site.
SNH	No Comments	
Transport Scotland	The majority of strategic transport network impacts will result from cumulative, rather than individual, impacts of development. A cumulative appraisal of sites impacting on the strategic transport network i.e. trunk roads and rail networks will need to be undertaken once there is certainty on what sites are preferred to come forward.	Due to the small scale nature of the development it is not anticipated that there will be any impact on the strategic road network.

WLC – Contaminated Land	No potentially contaminative activities recorded on site. Potentially contaminative industries, e.g. mining, clay brick and tile works, have operated within the vicinity of the site.	There are known contamination issues and ground conditions would be investigated as part of technical reports associated with a planning application.
WLC – Economic Property Development	No comments	
WLC - Education	No education support – capacity issues	It is anticipated that the small scale nature of the development would not generate enough pupils to adversely impact capacity at catchment schools.
WLC – Environmental Health		
WLC – Flood Risk Assessment	A Flood Risk Assessment is required for this site. Issues also of run off to public road would be unacceptable. Though this site is not shown to be at risk of flooding on the flood hazard maps we know from local knowledge that runoff from the site is a significant problem. There is also a history of flooding due to short term lack of capacity in the public sewer. Considerable thought would need to be given as to how this site could be developed in the context of the aforementioned difficulties. The usual attenuation and treatment of runoff criteria would apply.	The previous local drainage issues have been resolved through the development of the site to the north which included diversion of existing field drains, and there is no flooding risk associated with the site.
WLC – NETS and Land Services	No objections. Planning gain to be used to enhance quality of adjacent park. Review access to park across Hartwood Road.	This could be accommodated as part of the proposed development.
WLC - Transportation	New access required onto Hartwood Road. See also Transportation Background Paper to the Main issues Report (MIR) for further details.	Access suggestion will be investigated as part of detailed masterplan at planning application stage. The Transportation background paper confirms that any impact would be local and would not be enough to show on a transport model.
WLC – Waste Management	Generic Response - The only comment that Waste would wish to make at this stage is that the proposed 13,000 properties noted could in time merit a minimum of four additional vehicles for Waste Services. This is assuming the current collection regime remains as is (no shift changes) and accounts for food waste and glass taking off as well. Some detailed consideration would also need to be undertaken on recycling points and /or the potential for additional pressure on the amount of Community Recycling Centre sites we might operate at that time.	
WOSAS	No sites have been recorded from within the boundaries of the site, which was shown as undeveloped farmland on the 1st and 2nd edition Ordnance Survey maps. The plot is located outside the area of increased archaeological sensitivity associated with the historic core of West Calder. It is apparent from current maps and aerial photographs that a number of large breezeblock sheds have been constructed in the field to the south, presumably associated with some form of agricultural use, but the plot itself appears to remain as Greenfield. The previously undeveloped nature of the site means that there may be some potential for buried material associated with earlier phases of occupation to survive, and as a result, it is likely that that archaeological evaluation should take place in advance of any development. Again, however, the likelihood of buried material being present will be limited by the relatively small size of the plot.	Archaeology would be investigated as part of technical reports at the planning application stage.

- 8.5 As the landowner responses demonstrate, there are no issues raised in the consultation responses that cannot be fully addressed. As stated above the Council's conclusion regarding the proposed development of the site do not fully reflect the issues or lack of issues raised through consultation. Past issues with drainage and flooding have been dealt with and there are no longer flooding issues at Hartwood Road. The proposed development is of a scale that it will not prejudice the delivery of the CDA, and the nature of the site means that housing can be delivered in the short term and is not reliant on large scale infrastructure associated with CDA development. The transportation response does not raise any issues regarding access onto Hartwood Road. The development of the site for a limited number of units would not be visually or environmentally intrusive and would not detract from the rural character of the site and its surroundings.
- 8.6 The suitability of the site for development is further confirmed through the Strategic Environmental Assessment of the site.

Strategic Environmental Assessment

- 8.7 The site at Hartwood Road was assessed in terms of suitability for 20 units, however much of the conclusions can be assumed for the smaller scale development now being proposed for the site and indeed some of the concerns raised will be mitigated by the reduced capacity of the site.
- 8.8 In relation to landscape fit, exposure and trees/boundaries the SEA conclusions are positive and states that:

“the site is not significantly elevated or exposed and there is shelter belt woodland and bush planting around all four sides of the site that is well contained. Although the site would lead to an incursion into the countryside, this could read as a natural extension to the settlement of West Calder in this location. The site would be read together with the existing housing development at Hartwood Road, as a natural extension to that housing development. The site has well defined boundaries on all sides. To the north is a woodland shelter belt that backs onto Hartwood Road. To the south is a small belt of trees that defines the boundary with the former travelling peoples' sites. To the east is a belt of mature deciduous woodland and to the west there is a mature hawthorn hedge that delineates the edge of the site with the 'C' class road.”

8.9 In terms of site conditions the SEA is also positive and states that:

“The council’s contaminated land officer has identified no on site issues or constraints on this site. There appear to be no other constraints. There is no watercourse within the vicinity of the site and the site does not appear to be at flood risk from the SEPA Flood Risk Maps, however, the views of the councils Flood Prevention Officer should still be sought”

8.10 As confirmed above, the localised flooding and drainage issues have been resolved as part of the development of the housing site to the north, and are no longer present at Hartwood Road. The development of 10 to 12 units at this location would not increase flood risk or be at risk of flooding.

8.11 In relation to Transportation the SEA states that:

“The council’s Transportation Service require to confirm if the site could be accessed appropriately to the ‘C’ class road and whether the road would need upgraded and footpaths also introduced and the 30mph limit extended as at the moment this end at the houses Hartwood Road.”

8.12 It is anticipated that the reduction of the site capacity to 10 to 12 units will alleviate any concerns regarding access to the ‘C’ class road and that development will be safely accessed from Hartwood Road.

8.13 In relation to education, the SEA simply highlights that the education department will be required to prove comments. As stated previously it is anticipated that development of the small scale proposed at Hartwood Road will only generate a very small number of pupils and could be accommodated by available or planned education capacity in the local area.

8.14 The conclusions from the Strategic Environmental Assessment are also very positive and confirm that the site at Hartwood Road:

“could be developed for housing to an appropriate density at this edge of settlement location”.

- 8.15 As noted throughout this Supporting Planning Statement, the site is now being promoted for low density development, which is considered to be appropriate for this location. The SEA has confirmed that there are no issues in terms of transportation, education, flooding, ground conditions or biodiversity constraints that cannot be overcome or that would be an obstacle to the effectiveness and delivery of the site at Hartwood Road.
- 8.16 The Strategic Environmental Assessment of the site at Hartwood Road, by West Lothian Council, indicates that the site is suitable for the proposed scale of residential development. It should therefore be allocated for such in the emerging Local Development Plan Proposed Plan.

9.0 Summary of Benefits and Advantages of Site

- 9.1 Development of the site at Hartwood Road will enable West Lothian Council to comply with the policy requirements of SPP and the Government's specific objective to provide a generous supply of housing land. There is a need to maintain an effective 5 year housing land supply at all times, and the site at Hartwood Road, while small scale, is an effective and deliverable site and can contribute around 10 to 12 units in the short term to the housing land supply.
- 9.2 As noted in the Council's SEA document, the site is a logical extension to the settlement and would round off the existing settlement in a sustainable, viable and effective manner.
- 9.3 The site can be developed without any apparent physical or environmental constraints. In particular, the proposed residential development could be contained comfortably into the landscape, permitting small but high quality development in terms of design, layout and landscaping.
- 9.4 The development site is not subject to any specific countryside or landscape designation or protection.
- 9.5 New residential development at this location would not only provide a desirable location to live but would also represent a sustainable approach to development, which takes advantage of existing infrastructure capacity and the accessibility benefits of West Calder.
- 9.6 Further new housing of the type being proposed for this site would help sustain the local community by providing additional variety and choice of housing for potential house buyers in West Lothian.
- 9.7 The allocation and development of the Hartwood Road site for new housing would therefore help provide a different housing mix through the allocation of sites for private sector investment and assist in achieving a more balanced community. In doing so, this would help to contribute towards the Council's emerging Regeneration Strategy which seeks to address a number of key outcomes of reducing inequality, improving health and well-being, increasing employment opportunities, improving education and skills and carrying out environmental improvements.

10.0 Conclusion

- 10.1 On behalf of our client, [REDACTED], we would therefore request that the particular merits and advantages of this small site at Hartwood Road are reconsidered by West Lothian Council in light of the additional information submitted with this representation.
- 10.2 As a result, the site should be removed from its current countryside designation and allocated as a specific housing development opportunity with capacity for around 10 to 12 units in the LDP Proposed Plan.
- 10.3 This proposed allocation of our client's site in the new Local Development Plan would provide scope for a low density housing development in a suitable and accessible location. This would maximise the benefits and advantages of the site's location, and effectively "round-off" development in this particular area.
- 10.4 We trust the above comments will be taken into account in the preparation of the new LDP and we would welcome the opportunity to meet with the Council and its Planning Officers to review our client's proposals prior to the publication of the LDP Proposed Plan.
- 10.5 We trust this additional information in support of this site will be of assistance to West Lothian Council as part of the preparation of the Proposed Local Development Plan, and would respectfully request that this site is allocated for housing development in the Proposed Local Development Plan when it is issued for further public consultation next year.

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