From:	John Handley
To:	<u>wlldp</u>
Cc:	
Subject:	WLPLDP - Housing Proposal H-BD 5 - Bridgend Farm, Bridgend
Date:	10 November 2015 19:08:11
Attachments:	<u> Representation on Proposed LDP - 10.11.15.pdf</u> WLLDP MIR Submission - Supporting Statement (Final) - 01.10.14.pdf
Importance:	High

Dear Sirs,

West Lothian Local Development Plan – Proposed Plan Submission on behalf of Support for Housing Proposal H-BD 5 – Bridgend Farm, Bridgend

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 by way of your on-line consultation portal on behalf of our client, **supporting** the allocation of their 2.4 hectare site at Bridgend Farm, Bridgend as a new housing proposal in the Proposed LDP.

This site was assessed by the Council at the MIR stage and given the reference MIR Site Ref: EOI-0065.

It has now been allocated as a new housing proposal in the Proposed LDP and is identified as site H-BD5 Bridgend Farm on Proposals Map 2. It is also listed under the housing proposals on page 83 of the Proposed LDP with a capacity of 30 units.

However, we would wish to highlight that there is a small typing error on page 83 of the Proposed Plan with our client's site referenced as "*E*-*BD* 5". This should be changed to "*H*-*BD* 5".

The site has also been omitted from the list of housing sites set out in *Appendix Two: Schedule* of Housing Sites/Site Delivery Requirements.

Again we presume this is a typing error and we would therefore request that the site is included within Appendix 2 after page 165 which lists the Bridgend Housing Proposals.

On behalf of our client, we therefore fully support its inclusion as a new housing site in the Proposed LDP, but would request that the typing error on page 83 of the Proposed Plan is rectified and the site is included within Appendix 2.

As requested, we have made our submission via your on-line consultation portal (ref: 4ac75d1).

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.

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

Support for Housing Proposal H-BD 5, Bridgend Farm, Bridgend

MIR Site Ref: EOI-0065

This representation is made on behalf of landowner and developers

On behalf of our client, and following on from our submissions at the EOI and MIR stages, we wish to record our <u>support</u> for the allocation of our client's 2.4 hectare site at Bridgend Farm, Bridgend.

This site was assessed by the Council at the MIR stage and given the reference MIR Site Ref: EOI-0065.

It has now been allocated as a new housing proposal in the Proposed LDP and is identified as site H-BD5 Bridgend Farm on Proposals Map 2. It is also listed under the housing proposals on page 83 of the Proposed LDP with a capacity of 30 units.

However, we would wish to highlight that there is a small typing error on page 83 of the Proposed Plan with our client's site referenced as "*E*-*BD* 5". This should be changed to "*H*-*BD* 5".

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Again we presume this is a typing error and we would therefore request that the site is included within Appendix 2 after page 165 which lists the Bridgend Housing Proposals.

On behalf of our client, we therefore fully support its inclusion as a new housing site in the Proposed LDP, but would request that the typing error on page 83 of the Proposed Plan is rectified and the site is included within Appendix 2.

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

JOHN HANDLEY ASSOCIATES LTD

Chartered Town Planning Consultants 1 St Colme Street Edinburgh EH3 siAA



West Lothian Local Development Plan Main Issues Report 2014

Preferred Housing Development Site EOI – 0065 Land at Bridgend Farm, Bridgend

Supporting Planning Statement

Submission on behalf of:

JOHN HANDLEY ASSOCIATES LTD

Chartered Town Planning Consultants 1 St Colme Street Edinburgh EH3 6AA

October 2014

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

Proposed Residential Allocation on Site EOI – 0065, Land at Bridgend Farm, Bridgend

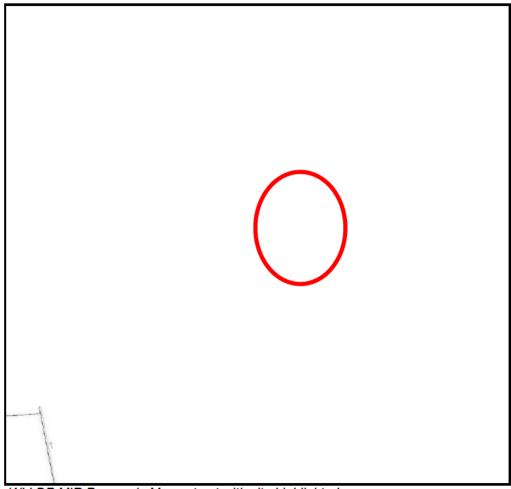
Introduction2 1.0 2.0 3.0 4.0 Site & Surrounding Area.....10 5.0 Site Effectiveness......15 6.0 7.0 Site History18 West Lothian Council Site Assessment...... 19 8.0 9.0 10.0

1.0 Introduction

- 1.1 This Supporting Planning Statement has been prepared by Chartered Town Planning Consultants, John Handley Associates Ltd, on behalf of **MIR**, in support of MIR Site EOI-0065. This Submission confirms landowner support for the 'Preferred Site' status in the Main Issues Report and sets out the opportunities for the proposed housing development site at Bridgend Farm, Bridgend.
- 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? agree with the 'Preferred' Strategy for housing growth in West Lothian insofar as it relates to Bridgend and the allocation of land for residential development at Bridgend Farm.
- 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 supports the Council's 'Preferred' status and the proposed allocation of the site at Bridgend Farm for residential development in the emerging Local Development Plan.

2.0 Main Issues Report

2.1 The site is identified in the MIR as *Site EOI-0065 – Bridgend Farm.* The site is shown in the extracts from the proposals map below:



WLLDP MIR Proposals Map extract with site highlighted

- 2.2 The allocation of the site at Bridgend Farm is fully supported by the landowner and can contribute to West Lothian Council's aims and objectives for the village. The site can also make a small but effective contribution to the West Lothian housing land supply.
- 2.3 The Bridgend Settlement Statement within the MIR considers issues within Bridgend; infrastructure considerations; spatial strategy considerations; and priorities for Bridgend.



2.4 An extract from the Bridgend Settlement Statement is detailed below:

Issues
Tackle areas of social deprivation; improve the housing mix.
Infrastructure considerations
The village is served by Bridgend Primary School and St Joseph's Primary, Linlithgow. It has no secondary school but is within the school catchment areas of Linlithgow Academy and St Kentigern's High School, Blackburn. A new secondary school is proposed at Winchburgh as part of the Winchburgh Core Development Area. This will result in changes to school catchment
areas.
Spatial strategy considerations
The availability of infrastructure, strategic location, and existing facilities makes the town an attractive option for future development.
Priorities
Review open space provision; promote path links to the wider path network and surrounding countryside; improve the housing mix; review settlement envelope

2.5 The allocation and development of the Bridgend Farm 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 Planning 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 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. NPF3 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 site at Bridgend Farm is preferred for residential development in the WLLDP MIR, and the allocation of the site 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 the Bridgend Farm site would provide an element of residential development to meet West Lothian's housing requirement and will contribute to the Council's priority of improving housing mix in Bridgend. The allocation of the site at Bridgend Farm is therefore 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"). Bridgend 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 Bridgend Farm 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 Bridgend Farm 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 Bridgend Farm 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.
- 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 Bridgend Farm 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 Bridgend to accommodate the proposed development of c. 30 units. The allocation of this site in the new LDP would therefore accord with Policy 7 of the SESplan.

4.0 Site & Surrounding Area

- 4.1 The village of Bridgend is located in the north west of West Lothian, on the south side of the Linlithgow/ Winchburgh Road (B9080), some 3.5km to the east of Linlithgow.
- 4.2 The site at Bridgend Farm is located to the north east of Bridgend and is accessed off Auldhill Road which is a minor road which runs north/south through Bridgend and forms a junction with the B9080 at the north end of the village.



Aerial Photograph showing location of site and relationship to existing settlement

4.3 The site extends to 2.7ha and is preferred for residential development in the MIR to accommodate 30 units.



4.4 The site is an elongated site located on the east and south sides of a small cul-de-sac of existing residential development at Auldhill Court, adjacent to the south east side of the junction of the B9080 with Auldhill Road. The northern boundary forms a short frontage onto the B9080 and its longer western boundary forms a frontage onto part of Auldhill Road.



Aerial Photograph showing location of site and relationship to existing housing



- 4.5 The site comprises the western part of a large, arable field which rises to a shallow crest in the middle and is bounded on its distant eastern edge by a fence and hedge row. To the north on the opposite site of the B9080, and to the east of the larger site are agricultural fields. To the south, a hedge and fencing separate the site from an area of public open space, including an equipped play area. To the west, fronting the opposite side of Auldhill Road, are detached houses.
- 4.6 Photographs of the site and its surroundings are set out below



View of site looking north east from Auldhill Road



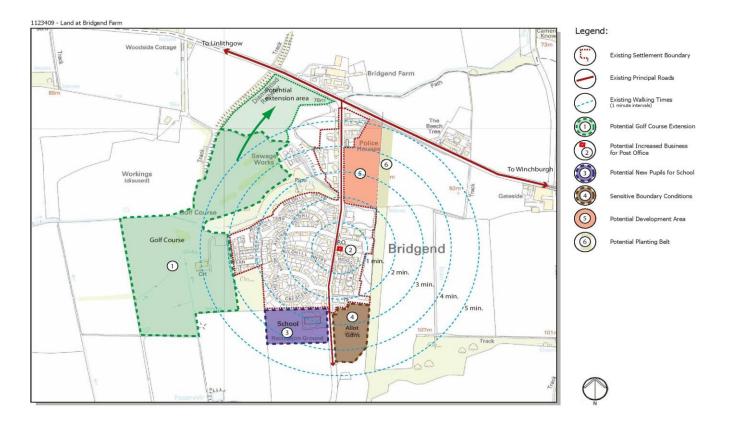
View of site looking south east from Auldhill Road



View of site looking north from junction of Auldhill Drive and Auldhill Road

5.0 Proposed Development of Site

- 5.1 As confirmed in the MIR, the site can accommodate approximately 30 units. As the Local Development Plan emerges and a future planning application is progressed, a masterplan will be prepared for the site. It is anticipated that residential development at Bridgend Farm would be compatible with the immediately adjacent uses and will be of a scale, density and character in keeping with the local area.
- 5.2 In addition to this small scale housing expansion of the village, the landowner is keen to support the wider community benefits that may arise from the residential development at Bridgend Farm. Opportunities for these benefits are shown on the Community Benefits Plan below.



Community Benefits - Land at Bridgend, West Lothian



- 5.3 A future masterplan will be prepared to reflect best practice in the planning and design of new housing development. This is a holistic approach that integrates urban design, land use, housing, transportation, ecology, landscape, conservation and energy efficiency.
- 5.4 Development at Bridgend Farm will provide a high quality, sustainable development which is planned, phased and developed in a coordinated and integrated manner. The future masterplan will demonstrate how the site will maximise opportunities to integrate the new development with the existing settlement and set out a landscape and framework which will enhance the setting of Bridgend at this location.
- 5.5 MIR Appendix 3 sets out preferred housing sites and proposed phasing. This indicates that 10 units could be delivered in the period 2014 to 2019 and the remaining 20 delivered between 2019 and 2024. The landowner however is keen to bring the site forward in order that the village can benefit from the development, a more optimistic rate of development is therefore anticipated.
- 5.6 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:
 - <u>ownership</u>: 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;
 - <u>physical</u>: 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;
 - <u>contamination</u>: 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;
 - <u>deficit funding</u>: any public funding required to make residential development economically viable is committed by the public bodies concerned;
 - <u>marketability</u>: the site, or a relevant part of it, can be developed in the period under consideration;
 - <u>infrastructure</u>: 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
 - <u>land use</u>: 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 specifically 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 the requirements of the PAN in turn the following is confirmed: the site is owned by **and the owners**, the owners of Bridgend Farm and the majority of the land surrounding the village of Bridgend. **are landowners**, farmers and property developers and have considerable experience of releasing land for development, particularly housing development throughout central Scotland. Whilst there is at this stage no preferred house builder, we can confirm that there has been significant interest from housing developers and the site will be released for development once allocated.
- 6.4 There are no known slope, aspect, flood risk, ground stability or vehicular access constraints which would preclude the site's successful and viable development. The site enjoys a generally south facing slope which aids passive solar gain and has a pleasant aspect in terms of adjacent land uses. Both the SEPA and WLC Flood Risk Assessment consultation responses on the Call for Sites exercise request a Flood Risk Assessment for the site. The FRA should assess the flood risk from the small watercourse which flows along the southern boundary, consideration should also be given to any culverted watercourses within/nearby the site. It is anticipated that any issues arising from FRA assessment can be mitigated. There are no ground stability issues and the site can be accessed directly off the Auldhill Road.
- 6.5 The proposal is a small-scale housing development which, unlike some of recent large scale housing releases, has no significant infrastructure requirements. The existing primary school has significant spare capacity and would benefit from more housing development, and the previous capacity constraints at Linlithgow Academy are being addressed. The site is an effective, viable, available and unconstrained site which can provide an element of the housing land requirements in the local development plan period.
- 6.6 Given the agricultural use of the site, there are no known contamination issues.
- 6.7 The site would not require any financing to make the development economically viable.
- 6.8 The site is located within a popular housing market area where there have been very few new housing opportunities in recent years. Despite current market conditions, there is demand for new housing in this area of the type and scale being proposed on this site. From the experience of the landowners' Property Advisers, the site can be successfully marketed within the plan period, and there has been a significant level of interest in the site from housing developers.

- 6.9 The site would be sold to a house builder to develop.
- 6.10 In this location, and given current market requirements, it is anticipated the build rate will be 10 -15 units per annum, taking 2-3 years to complete the site. This is a more optimistic build rate than set out in MIR appendix 3 but reflects the landowners desire to see development delivered at Bridgend.
- 6.11 Subject to the granting of the necessary planning and construction consents, it is anticipated that development could commence on site in 2016. However, the landowner is keen to progress an earlier development and would be prepared to submit an application for planning permission in principle in advance of LDP adoption should this be supported by the Council.

7.0 Recent Planning History

- 7.0 This site at Bridgend Farm 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 Winchburgh 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 call for sites submission suggested that: "a residential allocation on the Bridgend Farm site will help to increase local housing choice and would in turn help sustain existing services and business within the village. This includes the local primary school which is a valued focus for the community, but like other small rural schools has a falling school roll as a result of limited new housing development in the village over recent years. The housing site is a small scale development which has no significant infrastructure requirements. It is an effective, viable, available and unconstrained site."
- 7.3 The site has therefore been assessed in detail 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 now supported the allocation of this site for residential development in the emerging Local Development Plan with the 'Preferred Site' status in the Main Issues Report.

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 contributes 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. This is particularly applicable to communities located in the west of West Lothian by providing a different housing mix through allocating sites for private sector investment and assist in achieving more balanced communities."

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

Consultee	Issues Raised	Landowner					
conduitoo		Response					
British Airports Authority (BAA)	The site falls within the safeguarding consultation zone (which is 13km from an aerodrome, in this case Edinburgh Airport) under Circular 2/2003 'Safeguarding of Aerodromes, Technical Sites and Military Explosives Storage Areas' and also f alls within the Edinburgh Airport Lden noise contours as specified by The Environmental Noise Directive (2002/49) and supplemented in Scotland by the Environmental Noise (Scotland) Regulations 2006, relating to aircraft noise. Any proposal/application therefore will require to be subject of consultation with BAA aerodrome safeguarding. Any development is likely to be restricted to 15m in height and will contain flat roofs only and above ground SUDs systems should be avoided in order to minimise the potential of bird strike and landscaping will require careful design. Birds are mobile and whilst every effort can be taken on an aerodrome to address potential bird hazards, aerodrome safeguarding, through local authority planning permissions, is one of the key methods for addressing existing and potential hazards off-airport. To reduce the risk of bird str kes, specific requirements associated with landscaping schemes within 13km of Edinburgh Airport should be factored into development proposals from the outset. Addressing the constraint from the outset will also ensure the council as planning authority do not require amended landscaping schemes whilst processing any application and will not require amended plans post the qranting of planning permission.	BAA would be a statutory consultee during the planning application process					
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. This would be a due diligence check to ensure that potential	Coal mining data would be assessed as part of a package of technical reports submitted with a planning application					

		1
Historic Scotland	development sites do not contain any mine entries or other coal related hazards which would require remediation or stabilisation prior to development. Former mining activities and related hazards are not a strict constraint on development. The Coal Authority would not wish to suggest that any potential sites should be excluded from the assessment on the grounds of former mining legacy issues. In addition, an assessment should be made of the likely impact on mineral resources, including coal. This will help to ensure that any potential sterilisation effects (along with whether prior extraction of the resource would be appropriate) are properly considered in line with the guidance in Scottish Planning Policy No specific comments.	
	•	
HSE (Health and Safety Executive)	No specific comments.	
NHS - Lothian	Bridgend feeds into the Linlithgow catchments where the existing facility is Linlithgow Health Centre The existing health centre in Linlithgow is in poor condition and has no scope to be physically extended. If there was to be more demand/larger population, a new facility would have to be developed but it is unclear whether the existing GP practices would want to expand even if a new facility is built. The NHS has been tentatively approached by the Burghmuir applicant in order that a site for a new health centre could be provided on their site.	It is not anticipated that the scale of development will impact greatly on the NHS services provided in the area, but this can be assessed in further detail shout this be required.
	All GP Practices have their own 'catchment areas' and GPs work independently to the NHS with there being a mixture of ownership and tenures regarding building usage and stock. The focus in recent years has been a move towards shared services and the development of Partnership Centres. Further dialogue with the NHS will be required once new allocations have been identified.	
Scottish Enterprise	No specific issues or concerns.	
Scottish Water	In terms of water supply the site is served by the BALMORE water treatment works (WTW) where there is sufficient capacity. In terms of waste water treatment the site is served by the BRIDGEND waste water treatment works (WWTW) where there is sufficient capacity.	Scottish Water would be further consulted during the planning application process.
SEPA - Flooding	SEPA recommend that a Flood Risk Assessment is submitted for this site which assesses the flood risk from the small watercourse which flows along the southern boundary. Consideration should also be given to any culverted watercourses within/nearby the site. There is also the potential that this site could lead to increased flood risk potential out with this site.	A flood Risk Assessment would be carried out as part of a package of supporting documents for a planning application. It is anticipated that any flood risk could me mitigated given the small scale nature of the site.
SEPA – Water Environment	There is no water body of any significance close to this site. A buffer strip of 6m would however be required from development to the watercourse at the southern end of the site. No WFD pressure however straightened burn could be enhanced.There could be a restoration opportunity to enhance the straightened burn.	Appropriate landscaping of the southern watercourse would be included in a detailed masterplan for the site
SNH	No records. Potential green network link to existing woodland to south of the site.	Potential green network link can be explored as part of a detailed masterplan
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 an impact on the strategic road network.

WLC – Contaminated Land	No known issues. However, developers should satisfy themselves that all matters relating to ground conditions have been assessed.	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 at St Josephs RC Primary School, Linlithgow, the catchment RC Primary school but there is capacity at Bridgend Primary School.	It is anticipated that at the time of a planning application, any education issues will have been resolved by WLC
WLC – Environmental Health	No issues	
WLC – Flood Risk Assessment	Would require a Flood Risk Assessment which assesses the flood risk from the small watercourse which flows along the southern boundary. Consideration should also be given to any culverted watercourses within/nearby the site.Flood Risk Assessment is submitted for this site which assesses the flood risk from the small watercourse which flows along the southern boundary. Consideration should also be given to any culverted watercourses within/nearby the site. There is also the potential that this site could lead to increased flood risk potential out with this site.	A flood Risk Assessment would be carried out as part of a package of supporting documents for a planning application. It is anticipated that any flood risk could me mitigated given the small scale nature of the site.
WLC – NETS and Land Services	No Comments	
WLC - Transportation	Access off Auldhill 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 this area. The site was depicted as being undeveloped ground on the 1st, 2nd and 3rd edition OS maps, suggesting that it may retain some potential to produce buried deposits associated with previous phases of occupation.	Archaeology would be investigated as part of technical reports at the planning application stage.

8.3 As the landowner responses demonstrate, the issues raised in the consultation responses can be fully addressed as the site progresses through the local development plan process and any specific and technical requirements will be dealt with when a planning application comes forward for the development of the site.

Strategic Environmental Assessment

- 8.4 The site has also been the subject of Strategic Environmental Assessment; the SEA does not raise any issues of significance in relation to the proposed residential development of the site. The SEA Call for Sites-site appraisal raises similar issues as are detailed in the above consultation responses. The SEA Site appraisal additionally states that "there are a number of existing trees along the northern and southern boundaries but none of any significance within the main body of the site. Management and retention will require to be discussed with the council's arboricultural officer." The retention and management of trees on site is something that will be considered during the masterplan and planning application process.
- 8.5 In relation to education the SEA appraisal states that there may be capacity issues at Linlithgow Academy. The Main Issues Report Settlement Statement for Bridgend confirms the following as the position on education: *"The village is served by Bridgend Primary School and St Joseph's Primary, Linlithgow. It has no secondary school but is within the school catchment areas of Linlithgow Academy and St Kentigern's High School, Blackburn. A new secondary school is proposed at Winchburgh as part of the Winchburgh Core Development Area. This will result in changes to school catchment areas." It is anticipated that when a planning application comes forward on the site, education capacity issues will have been resolved by West Lothian Council.*
- 8.6 An extract from the SEA Assessment of proposed development sites is included below:

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ana ta biyon Janary AMA'A bi'''	MA areas/ avoid exace AQMAs/ avoid areas w QMAs? d proximity to jobs/ ser	vanuug cisting or	Avoid adverse effect on integrity ofdesignated international nature conservation sites?	Avoid causing significant effect on designated national/regional/iocal biodiversity sites & ancient woodland / geodiversity sites?	erse direct a positive (work ?	Occupy a relatively efficient location in terms of energy consumption	Occupy a location at risk of increased flooding or instability due to climate change?	Avoid adverse (or create positive) effects on listed buildings and/ or its setting?	Avoid adverse (or create positive) impact on scheduled monuments and for its setting?	Avoid adverse (or create positive) impact on locally important archaeological sites?	Avoid adverse (or create positive) effects on a Gardene & Designed Landscape?	Avoid adverse effects (or create positive) on Conservation Areas &/or other areas of architectural historic or townscape interest or	Avoid AGLVs / Areas of Special Landscape Control/ Areas of Special Control	Jous locatio	Avoid loss of/ adverse effects on public open space/ improve open space provision (quantity/ quality)?	Avoid loss of land important to avoidance of coalescence/ preservation of settlement identity?	Safeguard mineral resources from sterilisation (within Areas of Search)?	Minimise use of "Greenfield" land? Avoid co-location of sensitive develonment	with industrial facilities/ economic allocations?	Avoid loss of prime quality agricultural land and peatland?	Maintain status of baseline water bodies?	Minimise flood risk (on site or elsewhere)?	
Assessment V EOI: Ref/Site (Coli	√, / ,? , X		oferror	l site / R	110 = A	Iternat	ive sit	o / Do	d = N	ot Pr	ofer	rod site	ariei	ing fr	om the 1	followi	ng 9660	semon	at of t	OSEA	toni	ice)	

- 8.7 As can be seen from the above, the SEA highlights that there will be a requirement for Flood Risk Assessment on the site. As stated previously, a Flood Risk Assessment would be carried out as part of any technical supporting studies required as part of a planning application. It is anticipated that any flood risk could be mitigated given the small scale nature of the site.
- 8.8 The other negative issues raised through the SEA are 'the use of greenfield land' and the 'loss of prime agricultural land'. The Council have confirmed, through the Main Issues Report, that the issues that require to be addressed in Bridgend are social depravation and an improved housing mix. There is a shortage of brownfield land in settlements such as Bridgend, the only way to deliver the community benefits associated with new residential development is to build on greenfield land and this inevitable results in the loss of agricultural land. It is considered that the 2.7ha site a Bridgend Farm is not a significant loss in relation to the remaining agricultural and greenfield land in the area.

9.0 Summary of Benefits and Advantages of Site

- 9.1 Development of the site at Bridgend Farm will enable West Lothian Council to comply with the policy requirements of SESplan and the updated SPP including 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, the site at Bridgend Farm is an effective and deliverable site and can contribute 30 units in the short term to the housing land supply.
- 9.2 The residential site is an accessible, logical and natural extension to the village and would expand the existing settlement in a sustainable, viable and effective manner.
- 9.3 As confirmed by the West Lothian Council site assessments, the site can be developed without any apparent physical or environmental constraints. In particular, the proposed residential development of this site 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 within the green belt and 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.
- 9.6 The site is well located, taking access directly from the Auldhill Road and benefits from an accessible location close to existing bus stops and major transport corridors/ nodes (M9 and B9080)
- 9.7 While there are limited services in the village, new housing would help sustain the local community by providing additional variety and choice of housing for potential house buyers in West Lothian; potentially increasing trade for local businesses; providing new pupils for the local school and helping to ensure its long term future.

10.0 Conclusion

- 10.1 The site at Bridgend Farm is preferred for residential development in the West Lothian Local Development Plan Main Issues Report, and the allocation of the site in the emerging Local Development Plan would meet the aims and objectives set out in the settlement statement for Bridgend.
- 10.2 The allocation of the site is fully supported by the landowner, **manual**, and is considered to be effective and deliverable within the short term and will make an effective contribution to the West Lothian Housing Land supply.
- 10.3 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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