



2 Eliburn Office Park, Eliburn
Livingston, West Lothian
EH54 6GR

T: 01506 424920

F: 01506 424921

www.gladman.co.uk

Directors: D J Gladman BA, K J Gladman MCSP, SRP, J M S Shepherd BSc, CEng, MIEE, G K Edwards DipTP, MRTPI

VAT Registration No. 677 6792 63

Registered Address: Gladman House, Alexandria Way, Congleton Business Park, Congleton, Cheshire, CW12 1LB, Registration No. 3341567

forward, the content of preferred sites therein, and the statutory requirement to have a five-year effective housing land supply at all times.

- This proposal is for an economically viable stand-alone development, delivering all requisite infrastructure on a developer funded basis, on a short term basis (within 5 years), meeting key concerns of West Lothian Council.

The planning application submission thoroughly demonstrates effectiveness and potential for delivery of 150 new homes within the LDP timescale. This proposal gives WLC an opportunity to deliver units on the ground in the short term, with site start as early as 2016. This is an effective site and should be recognised and supported as such.

In order to further aid your consideration of this development option, we enclose:

- Proposed Plan Consultation Response Forms
- Indicative Masterplan
- Planning Appeal Statement Including Appendices
- Design Statement
- Landscape and Visual Appraisal

Land at Brotherton Farm provides an attractive, accessible and effective option for the planned growth of Livingston, helping to meet specific housing land requirements in the critical 2009-2019 period, for which there is a significant and recognised shortfall. We would urge West Lothian Council and the Reporter in due course, to fully consider this proposal and include the site as part of the housing land supply via an allocation in the forthcoming LDP.

Yours faithfully,



For Gladman Developments Ltd.

Tel: 01506 424920

planningscotland@gladman.co.uk

Your details (mandatory)

Please indicate in what capacity you are making this submission:

- as an individual (and representing your own views)
- as a representative of a private or commercial organisation (and representing the views of that organisation)
- as a representative of a public organisation (and representing the views of that organisation)
- as an agent (and making comments on behalf of other individuals that you represent or third parties)
- other

Please complete the following contact information:

Name	<input type="text" value="Gladman Developments Ltd."/>
Email	<input type="text" value="REDACTED"/>
Telephone	<input type="text" value="REDACTED"/>
Address	<input type="text" value="REDACTED"/>
Organisation name	<input type="text" value="Gladman Developments Ltd."/>
Client's name	<input type="text" value="REDACTED"/>

Is this the first time you have made a written representation on the Proposed Plan? (mandatory)

- Yes No

If you have previously submitted a site to be considered for development when the council was initially seeking Expressions of Interest (EOI), or commented on the *Local Development Plan* at the *Main Issues Report (MIR)* stage, or made a previous submission to the *Proposed Plan* please provide the reference given to you at that time if known.

EOI & MIR reference number can be found on any email or written communication we may have previously sent you.

Enter EOI (Expression of Interest) reference here	<input type="text"/>
Enter MIRQ (<i>Main Issues Report</i>) reference here	<input type="text" value="MIRQ0123"/>

Once form has been completed please sign and date (mandatory)

You do not have to respond to all of the questions set out only those which you feel are of particular relevance to you.

Signature Date

FOR OFFICE USE ONLY

Proposed Plan reference

Please use this form for sections: Foreword; Background; Context; Role and Purpose of Plan; Vision Statement and Aims; The Spatial Strategy (including Policy Framework); Appendices; Glossary; Proposal Maps; Strategic Environmental Assessment (SEA) Environmental Report; Equalities and Human Rights Impact Assessment (EQHRIA); Strategic Flood Risk Assessment (SFRA); Habitats Regulations Appraisal; Transport Appraisal (TA); and Action Programme.

Section title

Page nos. Paragraph nos.

As set out in the supporting documents, based on the latest Housing Land Audit (2014), the Council has at best 2.6 years supply of effective housing land. However, the Council continue to rely on committed sites that have historically failed to deliver housing units on the ground. The opportunity remains for the Council to allocate additional housing land that has potential to deliver new housing in the plan period. Furthermore, additional allocations will add greater flexibility and certainty to the housing land supply to safeguard against future failure.

- Livingston is the principal settlement within the West Lothian Strategic Development Area (SDA); recognised as accessible and well placed for investment and growth yet the LDP proposes no new significant housing land allocations in the town in the period to 2024.
- Land at Brotherton Farm sits in the Countryside Belt on the western edge of the town, outwith any existing landscape protection designations. The site is at the eastern extremity of the boundary of the proposed 'Upper Almond Valley' Landscape Character Unit (LCU) and would not affect its overall landscape characteristics.
- As demonstrated in the LVIA and Design Statement, the development of this site follows an established pattern of development in Livingston townscape.
- This proposal is for an economically viable stand-alone development, delivering all requisite infrastructure on a developer funded basis, on a short term basis (within 5 years), meeting key concerns of West Lothian Council.

Please also see attached covering letter and supporting submissions.

Section title

Page nos. Paragraph nos.

Please use this form for sections: The Spatial Strategy and Development by Settlement

Settlement	Livingston		
Site address / location	Brotherton Farm, Livingston		
Site Ref		Page nos.	Proposals Map

Livingston is the principal settlement within the West Lothian Strategic Development Area (SDA); recognised as accessible and well placed for investment and growth yet the LDP proposes no new significant housing land allocations in the town in the period to 2024.

It is proposed that land at Brotherton Farm should be included in the Housing Land Supply and an allocation for delivering development within the plan period, as set out in the supporting documentation.

Settlement			
Site address / location			
Site Ref		Page nos.	

Additional comments

Please use this space to add any additional comments which have not been covered elsewhere in this questionnaire.

In addition to these forms, in order to fully understand the proposal and consider our complete response, please refer to all supporting documentation as set out in our covering letter:

- Gladman Developments Covering Letter
- Indicative Masterplan
- Planning Appeal and associated appendices
- Design Statement
- Landscape and Visual Appraisal

Many thanks.





Site

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1. Introduction

- 1.1 This report describes the landscape and visual impact appraisal undertaken for a proposed residential development at Brotherton Farm, on the western side of Livingston. It has been prepared by horner + maclellan, Landscape Architects.
- 1.2 The report describes and illustrates the findings of the landscape and visual impact appraisal, which was undertaken between February and August 2014. The appraisal comprised a desk based study of relevant planning and design documents related to the proposal site, supplemented with a visit to the site, the surrounding landscape and a range of selected viewpoints included within the visual impact appraisal. Initial landscape and visual analysis of the site and its context informed the design development of the proposed layout and the detailed extent of the site boundary along its western boundary, to work with the landscape character and pattern of the area and minimise landscape and visual impacts of the proposed development.
- 1.3 The following sources of information and guidance have been used in the preparation of this report:
- o Guidelines for Landscape and Visual Impact Assessment 3rd Edition The Landscape Institute and the Institute of Environmental Assessment 2013
 - o The Lothians Landscape Character Assessment, ASH 1998
 - o West Lothian Local Plan January 2009
 - o Vision Document, 7N Architects February 2014
 - o Masterplan Proposal – 7N Architects drawing no PPP003 dated 04.08.14
 - o Panoramic site photographs provided by 7N Architects
 - o OS 1:50,000 mapping.

2. Baseline Conditions

Location

- 2.1 The site is located on the south-western side of Livingston New Town in West Lothian (Figure 1). Livingston is a New Town dating from the 1970's and extends to the north and south of the River Almond with a mix of low density residential suburbs and industrial estates absorbing the original village and surrounding farmhouses and mansions which once extended throughout the surrounding area. The site lies immediately north of the A71, one of the major communication routes through central West Lothian. The site is located immediately adjacent to the Livingston settlement boundary identified within the adopted West Lothian Local Plan.
- 2.2 Figure 2 indicates the location of the site in the current context of Livingston and the surrounding area. The area shown on Figure 2 has been taken as the study area for this appraisal.

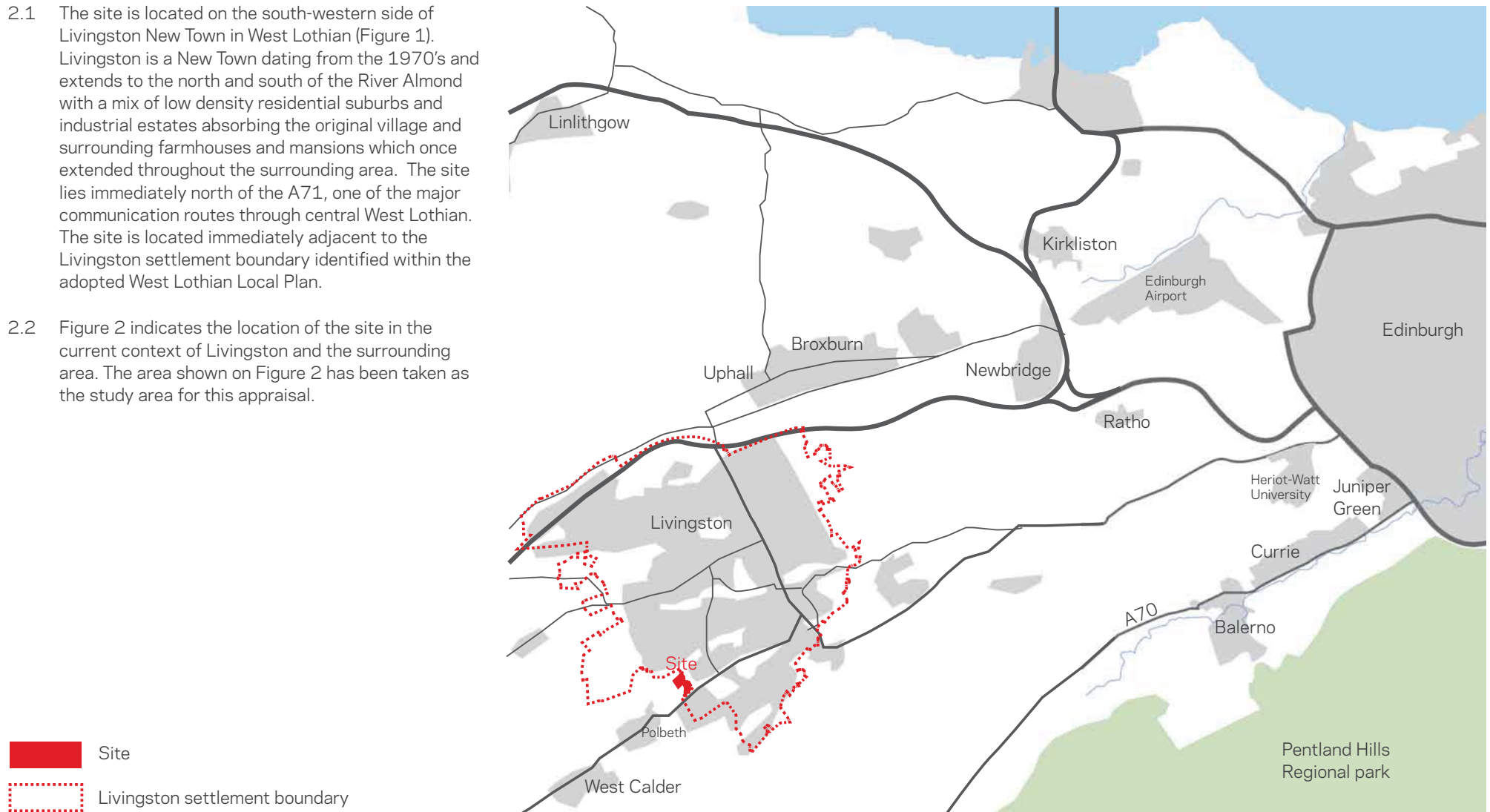


Figure 1: Livingston and the development site in wider context



Figure 2: Site in the context of Livingston.

2. Baseline Conditions

Context and Setting

- 2.3 The site currently comprises of two agricultural fields of improved pasture which lie to the east and north-east of Brotherton Farm. A dense band of mixed woodland defines the eastern boundary to the site.
- 2.4 The southern site boundary abuts the A71 and comprises a remnant tree lined access with occasional sections of low stone boundary wall and ditch embankment. Many of the trees are over-mature and in places there is little understorey vegetation, allowing peripheral views into the site for passing motorists, although it provides an important roadside boundary character to the A71. The boundary with the existing roundabout on the A71 comprises of a dense well established shrub/hedge, and the roundabout includes an access road leg which would provide access into the site from the south and has been provided in anticipation that some form of development would occur on the site, or as a potential access route to the Alba Business Campus to the north.
- 2.5 The eastern site boundary comprises a significant area of mature mixed woodland known as the Wilderness, and which forms a dense physical and visual separation of the site with the residential development of Adambrae to its east. There are no views from Adambrae to the site through The Wilderness, although an informal network of paths extends throughout the woodland.
- 2.6 The tree lined access track to Brotherton Farm, and the mixed tree belt which encloses the eastern side of the farm complex, forms the western boundary to the southern section of the site. A field boundary with sporadic individual mature trees divides the southern and northern parts of the site, with a further field boundary of sporadic trees defining the northern boundary to the site. The western boundary to the northern section of the site is undefined, extending across the open agricultural field.
- 2.7 Beyond the site to the north, an open agricultural field of improved pasture separates the site from the allocated employment land for the southern expansion of Kirkton/Alba Campus, a mixed used business park to the north. Currently, this area is unmanaged and has the character of vacant land.
- 2.8 Further open fields of improved pasture extend westwards from the site to the wooded tree belt of Limefield Glen which lines the Harwood Water, beyond which lies the residential areas of eastern Polbeth.
- 2.9 Brotherton Farm itself comprises of large complex of residential and agricultural buildings, set within a tree group which assists in masking its overall extent and scale.
- 2.10 Figure 3 indicates the local context of the proposed site.



Figure 3: Local context of the proposed site

2. Baseline Conditions

Landscape Character

Context

2.11 Much of western West Lothian comprises a heavily modified lowland plateau landscape, which extends outwith the district, and is characterised by a gently undulated slightly elevated plateau predominantly dominated by a land cover pattern of grassland types. Within this strategic landscape context, a series of broad valleys and lowland plateaux landscape character types (LCT) can be identified, and which can be further subdivided in terms of landscape character into more detailed landscape units (LU). The site is located within the far eastern section of the 'Broad Valley Lowlands', and specifically within the 'Upper Almond Valley', as described in the West Lothian Landscape Character Classification report of June 2014, where the LU abuts the western edge of Livingston.

2.12 The 'Upper Almond Valley' LU extends through much of central western West Lothian, where the predominant land cover of improved pasture has been considerably influenced by extensive residential and industrial developments dating from the 19th and 20th centuries. The overall landscape pattern has been fragmented by these developments, particularly the extensive transportation and communications network which extends throughout the area, although significant areas of woodland continue to define the layout of Livingston and enclose its edges. Oil shale and colliery bings throughout the area provide a visual reminder of the areas industrial heritage. There is a distinctive west-east grain to the gently

undulating landscape. Despite being a predominantly open landscape, with long distance views out to higher ground in the surrounding area, the horizon is often defined by modern development and infrastructure features. The landscape character of the site and its surroundings is shown on Figure 4.



Figure 4: A selection of images to illustrate Landscape Character

Topography

2.13 The landform pattern of the site reflects the gently undulating character of the wider landscape and of the 'Upper Almond Valley' LU. Whilst relatively flat and gently sloping in its southern section, the site falls gradually to the north, becoming steeper to form a gentle small-scale valley which runs eastwards from Brotherton Farm, becoming more defined where it enters The Wilderness. The ground then rises again to the north, before beginning to fall gently northwards again to the northern site boundary. This central valley feature provides one of the key characteristics of the site, and physically and visually separates the southern and northern sections of the site. Ground level is relatively constant from east - west across the site. The topographic changes across the site are quite marked, although the slope profiles are predominantly smooth and gradual. The eastern section of the shallow valley feature forms the lowest point on the site, and acts as the catchment location for much of the site drainage pattern.

Vegetation

2.14 The vegetation pattern is predominantly geometric in character, reflecting the agricultural field pattern of the site and its surroundings, and probably dates from the agricultural improvements of the mid 18th century. The Wilderness forms a major block of mixed woodland which physically and visually encloses the eastern boundary to the site, and represents the largest block of woodland within the surrounding area, despite some internal recent windblow of trees.

2.15 The southern boundary comprises of a narrow belt of sporadically spaced deciduous and coniferous trees lining either side of a former access route, and interspersed with some limited understory shrub and bush vegetation. This presents a slightly 'gappy' appearance from the adjacent A71. Around the Wilderness roundabout, the planting character comprises a well established hedge and shrub mix. A slightly thicker belt of mixed trees curves around the eastern side of Brotherton Farm, following a ditch line, to join the other tree lined field boundaries of the site, which comprise of single lines of individual, predominantly over-mature trees set at sporadic intervals. Whilst defining the historic field pattern of the area, these tree lines have limited presence within the landscape, being of a generally open character.

2.16 Vegetation is predominantly mixed in character, with a good diversity of species composition. Species are typical of a lowland agricultural landscape, with maple, sycamore, ash, and hawthorn being prevalent, with a good percentage of pine, spruce and larch occurring. This mixed woodland character is typical of the wider area and of the major plantings associated with Livingston. Much of the vegetation, specifically the individual trees along field boundaries, are over-mature and unmanaged, with a limited life span, and are typical of much of the tree cover throughout the wider countryside.

2.17 The individual fields of the site are farmed as improved pasture, for cattle and sheep, with very limited field edge margins along the site boundaries and field divisions.

Landscape Pattern

2.18 The site comprises a simple landscape pattern of medium scale agricultural fields which extend westwards from the edge of Livingston to Polbeth and beyond. This field pattern reflects the predominant east - west grain of the undulating low ridges and shallow valleys which cross the area. Boundaries are regular and relatively geometric or slightly curving, although their existing tree lines are too fragmented to significantly reinforce and emphasise the landscape pattern of the site. This is an area with a strong contrast between the enclosing pattern of woodlands and tree lines to the south and east of the site with a more open, expansive character to the west and north. Despite the industrial heritage of much of the surrounding region, this area retains a recognisable well defined landscape pattern. See Figure 5.

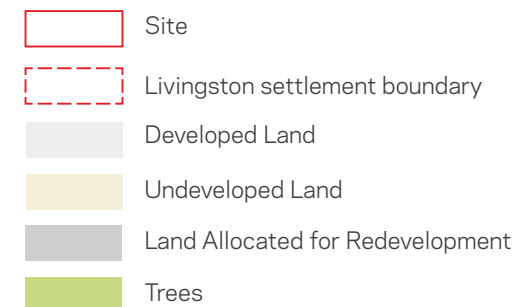
Local Development Pattern

2.19 Livingston has a recognisable development pattern to its overall layout, comprising of clearly defined zones of residential development interspersed with industrial and business park areas, all set within an almost continuous coherent and connected pattern of open space and landscape tree belts, and with a segregated access network linking through the open space areas. As the town has grown and developed, landscape features have been incorporated into the overall layout, resulting in a comprehensive inter-connected landscape structure throughout the New Town, which creates a well-defined spatial structure to the settlement and a resultant characteristic physical and visual enclosure and setting to individual neighbourhoods. Developments on the edges of the towns' green network incorporate established landscape buffers, with green space and tree belts permeating through the development layout. See Figure 5.

2.20 A proposed recreational route is indicated in the West Lothian Local Plan running southwards from the Kirkton Campus and following the eastern edge of the Limefield Glen woodland, to the west of the proposal site.



Figure 5: Livingston landscape and settlement pattern



Local Development Densities

2.21 The existing development densities in the nearby residential areas of Livingston and Polbeth are:

1. Polbeth, Langside Crescent - 17.8 dwellings/Ha
 2. Polbeth, Langside Gardens - 33.3 dwellings/Ha
 3. Livingston Village, Cypres Glade - 16.4 dwellings/Ha
 4. Bellsquarry, Slatscoats Gardens - 11.4 dwellings/Ha
- See figure 6.



Figure 6: Surrounding development densities

Building Character

- 2.22 Surrounding residential areas comprise of late 20th century development, featuring Radburn, courtyard and cul-de-sac layouts, often with communal parking courts. Buildings are predominantly two storey terraces or semi-detached, often with small front gardens with some interspersed connected bungalow development, being finished in light coloured harling.
- 2.23 Brotherton Farm comprises of several traditional farmhouses, predominantly white in colour, with an assortment of large-scale agricultural buildings. Collectively these form a considerable extent of built development, although their overall prominence within the wider landscape is considerably reduced by the tree groups which surround the farm.
- 2.24 To the south of the A71, mixed light industrial and business uses set within a grid layout typify the mediocre built and landscape quality of much of Livingston.
- 2.25 To the north, the planned layout of the Kirkton Campus comprises of a series of contemporary coordinated business pavilions set within a structured layout of tree avenues and hedges, and presents a higher architectural and landscape design quality.
- 2.26 See Figure 7 for examples of the surrounding building character.



Figure 7: Building character in surrounding residential neighbourhoods

2. Baseline Conditions

Visual Character

- 2.27 The site generally is located in an area where views to it from the surrounding area are relatively limited. The dense woodland of The Wilderness obstructs all views to the site from the Adambrae housing area to its east, although filtered views of the site looking westwards are available from within the western section of the woodland from the informal footpath network.
- 2.28 Filtered views northwards from the A71 look over and across the southern section of the site to the more distant hills and settlements to the north, although most of the site is hidden in these views due to the falling topographic pattern. These views are mostly available to the immediate west of the Wilderness roundabout, becoming progressively more screened by the tree belt along the southern edge of the site when heading westwards and by hedge and shrub planting around the roundabout itself.
- 2.29 From the west, the southern section of the site is predominantly hidden by Brotherton Farm, its tree lined access track and associated tree groups, with only limited glimpses of the southern section of the site being available between existing trees. From the residential areas on the eastern edge of Polbeth, filtered views through the Limefield Glen tree belt are available to the northern section of the site, which is set behind a hedge lined track leading north from Brotherton Farm. Brotherton Farm itself has views across the southern section of the site, although existing trees and agricultural sheds screen views further northwards.
- 2.30 From the north, at the Alba Business Campus, the ground rises across intervening vacant and agricultural land to a shallow ridgeline and field boundary which forms the northern edge of the site. Much of the site itself is hidden within these views as a result of the topographic pattern of the site and its surroundings. From the north-west, the combination of rolling topography and tree belts associated with the Harwood Water and West Calder Burn result in limited views of the site, and the area is characterised by agricultural fields with limited access.
- 2.31 From within the site, views are either expansive and extensive to the north from the more elevated areas, or limited and enclosed from within the small valley features. Views to the east are fully enclosed by the Wilderness woodland, and also limited to the south by the southern tree belt and the vegetation on the southern side of the A71. Views westwards extend across open fields to the settlement edge of Polbeth seen beyond the intervening Limefield Glen woodland. Figure 8 indicates the general visual character of the site and its surroundings.
- 2.32 A selection of viewpoints have been identified around the site which are considered as representative of a range of views towards the proposed development, based on differing distances, orientation and users.



Figure 8: A selection of images to illustrate Visual Character

2. Baseline Conditions

Livingston Countryside Belt

- 2.33 The West Lothian Local Plan (Figure 9) identifies the proposal site within the Livingston Countryside Belt, designated with the intention of preventing coalescence between Livingston and the surrounding smaller scale settlements. The Countryside Belt extends northwards from the A71 to the southern boundary to the designated employment land at the southern side of the Alba Business Campus, and westwards from The Wilderness to surround Polbeth to its east, north and west.
- 2.34 The proposed development site lies to the west of The Wilderness, the large-scale woodland block which currently defines the western boundary to Livingston in this area. The existing Brucefield Industrial Estate lies to the south of the proposed development site, south of the A71, whilst to the north lies the existing Kirkton Campus and its proposed southerly and westerly extension, both of which extend the western edge of Livingston to the west of The Wilderness.
- 2.35 It is noted that to the south of the A71, the West Lothian Local Plan allocates proposed housing development, within the countryside belt which, when implemented, would result in the joining of the Brucefield Industrial Estate on the western edge of Livingston with the West Calder High School on the eastern edge of Polbeth.
- 2.36 Given the Countryside Belt location, the development proposal will require to demonstrate clearly that the development of the proposal site could occur without compromising the character of the Countryside Belt and the ability of Livingston and Polbeth to remain to be perceived as separate settlements. This will be dependent upon the detailed landform and vegetation characteristics of the site itself and the design layout adopted, in terms of landscape framework planting, open space provision and building location and design.

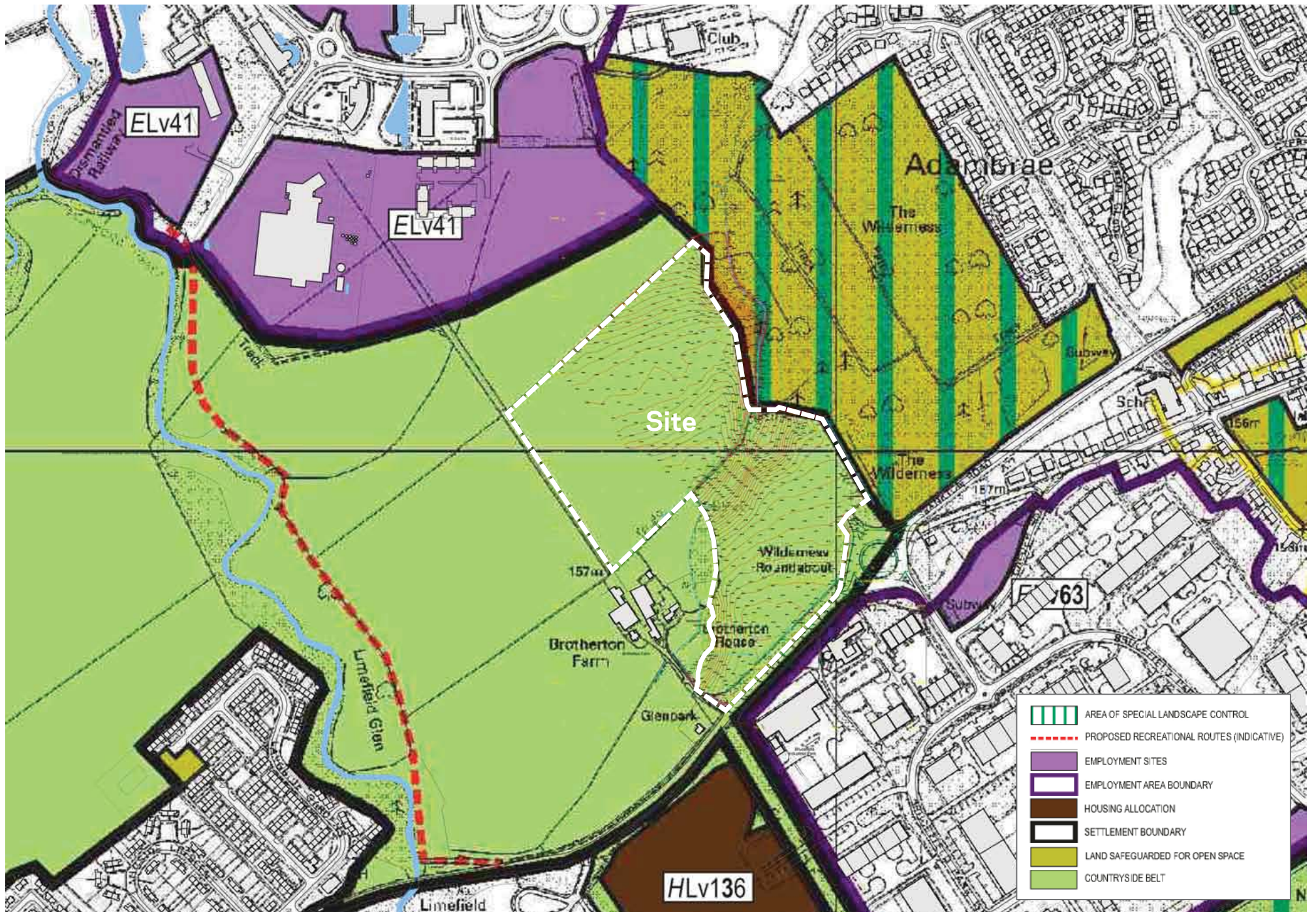


Figure 9: West Lothian Local Development Plan - January 2009

2. Baseline Conditions

Local Landscape Designations

2.37 The West Lothian Local Plan (2009) defines two types of local landscape designations, both aimed at protecting the character and quality of the West Lothian landscape:

- Areas of Great Landscape Value (AGLV)
- Area of Special Landscape Control (ASLC)

To accord with Scottish Planning Policy (2014), which advocates a single tier of local landscape designations, supported by clearly explained reasons for designation, West Lothian Council recently commissioned a Local Landscape Designation Review of AGLVs and ASLCs within West Lothian, leading to a new, more robustly justified single tier of 'Special Landscape Areas' (SLA). There are no AGLVs in close proximity to the proposed development site.

2.38 The Wilderness woodland to the east of the site is currently designated in the West Lothian Local Plan as an ASLC. The woodland forms part of a wider network of woodland and open green spaces which interconnect around Livingston and contribute to the local landscape character, biodiversity and general amenity of the area. Within the Local Landscape Designation Review, The Wilderness would not be included within the candidate SLAs, and therefore would no longer be classified as a Local Landscape Designation within subsequent local plan updates.

2.39 Currently, planning policies seek to protect the landscape character and biodiversity value of The Wilderness from intrusive development, whilst also seeking to enhance its recreational and educational value, in a manner which does not undermine the key

landscape and biodiversity value of the area.

2.40 Whilst the proposed development site is located outwith the boundary of The Wilderness, and therefore development of the site is unlikely to have any direct intrusive effects in terms of loss of woodland cover, the site's adjacent location could impact on the landscape character and setting of the area, and the design of the proposed development will require consideration of this issue as part of a wider appraisal of the development proposal.

2.41 The proposed development could also have potential impacts on the biodiversity value of the area, in terms of increased numbers of recreational users within the woodland and changes to the local drainage characteristics, although there would also be opportunities to increase the recreational value of the area as part of the proposed development. These issues will have to be addressed by the proposed layout of the development and considered as part of a wider appraisal of the development proposal.



Figure 10: The Wilderness woodland to the east of the site



3. Description of Development Proposal

- 3.1 The illustrative masterplan (Figure 11 overleaf) indicates the overall layout of the proposed residential development and its associated landscape and open space treatments. In relation to this landscape and visual impact appraisal, the development proposal has the following characteristics:
- o Reinforcement of the existing southern tree belt along the southern boundary of the site, and the curving tree belt to the east of Brotherton Farm
 - o Provision of a series of landscape belts and open space provision across the site, following the existing field boundaries and the shallow valley of the site
 - o Aligning the entrance access road from the A71 to retain the view northwards to more distant hills
 - o Forming a robust landscape boundary to the western edge of the site where it runs across an open field.
 - o Setbacks of development from key landscape features and boundaries would be introduced to establish a comprehensive landscape framework for the development on the site. These setbacks would maintain and enhance the existing tree cover around the site, and also help to establish wildlife corridors through the site, whilst organising the structure of the landscape around the established field boundaries, boundary features and topographic pattern of the site.
 - o Residential streets would be designed as shared surface Home Zones in accordance with Designing Streets principles, with the shared surface spaces accommodating staggered landscape planting to break down the scale of the spaces and to create the character of a 'garden suburb', appropriate for the settlement edge location
 - o An acoustic barrier comprising a 1.8m high earthwork bund topped with a 1m high acoustic fence located along the northern edge of the southern boundary tree belt and around the north-western side of the Wilderness roundabout
 - o A bridge crossing of the central valley, linking the northern and southern sections of the site
 - o Short and long term footpath connections to the Wilderness and the proposed recreational route to the west
 - o The building material palette would comprise of muted wall colours and dark slate roofs, to minimise the level of visual contrast with the surroundings and therefore reduce the degree of visibility of the development from within the wider landscape.
 - o Structure landscape planting and open space areas would be implemented as part of the initial stage of the development, to establish an initial landscape setting into which the built development is introduced.



Figure 11: Masterplan proposal

4. Landscape and Visual Impact Appraisal

Landscape Character

Introduction

- 4.1 For the purpose of the assessment, it is assumed that the proposed development would take approximately 5 years to implement and complete. It is also assumed that all the proposed landscape framework planting and the open space areas within the proposed development are implemented within Year 1 of the development programme.
- 4.2 Therefore, the proposed development has been appraised following final completion stage in 2020, which will allow for approximately 5 years of plant growth for the proposed areas of new planting associated with the proposed development. Comments are also provided in the visual impact section on the likely impact at Year 2025, where the proposed planting would have had 10 years to establish and mature.

Landscape Character Areas

- 4.3 The proposed development would introduce permanent built forms and associated landscape planting and open spaces into a section of existing open agricultural landscape to the south-west of Livingston. This would result in direct impacts on the existing landscape character of the site. At a detailed site level, this would result in a major alteration of, and impact on, the existing character of the development site.
- 4.4 The introduction of the proposed development would result in an extension of the built settlement footprint of Livingston, although this change would occur right at the eastern extremity of the boundary of the 'Upper Almond Valley' LCU and would not affect its overall landscape characteristics. Whilst there would be a slight reduction in the extent of agricultural land within the LU, the proposed development would not result in further fragmentation of the existing landscape pattern of the LU, with existing boundary tree belts being reinforced and extended as part of the proposed development. Any impacts on the LU and the wider 'Broad Valley Lowlands' LCT would be limited and of a minor nature at most.

Topography

- 4.5 The general topographic pattern of the site would essentially be retained. Whilst some detailed levelling of the site would be required to form platforms for individual houses and for the achievement of access road profiles, the development pattern would follow the topographic pattern of the site, and avoiding the steeper slopes

flanking the central valley feature which would be retained intact. Areas of open space around existing landscape features and landscape buffer areas at the peripheries of the site would retain the existing ground levels intact, and consequently there would be no alteration to the topographic pattern of these areas. The retention of the existing slope profiles of the site is an important part of the overall design strategy and would allow the development to sit within the natural contours of the site. The bridge crossing of the central valley would comprise of a composite open box culvert structure which would essentially retain the profile and form of the valley feature intact. A new acoustic barrier comprising of a 1.8m high earth bund would be introduced towards the southern part of the site, which would alter the detailed landform character of this section of the site.

Vegetation

- 4.6 Existing field boundary trees and vegetation would be retained as part of the proposed development, and supplemented with new areas of planting. The existing pattern and character of vegetation of the site would be extended and supplemented with new planting, which would reinforce and strengthen the existing vegetation character of the site. All existing trees within the boundary tree belts would be retained. There would be an overall increase in the extent of planting within the site and along its boundaries, reinforcing the pattern of planted field boundaries which characterise the local area, particularly along the western boundary of the site, to the north of Brotherton Farm where there would be a significant increase in the extent of planting. There would be some loss of existing hedge and shrub planting around the north-western side of the

4. Landscape and Visual Impact Appraisal

Landscape Character

Wilderness roundabout to accommodate the proposed acoustic barrier. The Wilderness woodland lies outside the site boundary and would be unaffected but the new development maintains a 10m buffer from it.

- 4.7 Open space areas, SUDS features and the acoustic barrier within the development offer the potential to diversify the vegetation character of the site and its surroundings, through the introduction of a wider range of native and semi-native plantings associated with these features, and which could provide further seasonal interest.

Landscape Pattern

- 4.8 The proposed development would respect the existing landscape pattern of the site, by retaining existing field boundaries and tree lines, and reinforcing and extending these as part of the proposed landscape structure of the site. The general geometry of the site boundaries would also be reinforced and extended by buffer areas of the proposed landscape structure and open space pattern of the proposed development. Proposed street alignments are predominantly positioned perpendicular or parallel to the site boundaries, and their associated street tree planting further continues and strengthens the local landscape pattern of the site. The landscape pattern of the site would follow the existing landscape pattern of the wider New Town, with a strongly defined pattern of tree belts and open spaces which is inter-connected to, and an extension of, the adjacent landscape pattern, and which would form physical and visual enclosure to the development site itself. This approach would ensure

that the development of the site would continue and strengthen the established landscape pattern and network of green spaces of Livingston.

Development Pattern

- 4.9 A general development density of 152 units at 19.7 units per Ha has been adopted for the proposed development. This approach would reflect similar density patterns within the surrounding areas to the west, ensuring that the proposal would continue adjacent patterns of development density, and relate to the general development character of the surrounding area.
- 4.10 A development density of 19.7 units per Ha also allows an appropriate provision of open space and landscape framework planting to be provided throughout the development layout, and which would considerably assist in integrating the proposed development into its settlement edge location and character.

Summary

- 4.11 The proposed development would have the following impacts on landscape character:
- o There would be little impact on the overall landscape character of the area, due to the sites location at the eastern periphery of the relatively extensive 'Upper Almond Vallery' LU, where the key landscape characteristics of the LU would be essentially unaffected.
 - o The general topographic pattern of the site would

be largely retained and essentially unaltered

- o The existing vegetation pattern and character of the site would be retained and supplemented with new planting, increasing the overall level of planting on the site and the potential for diversification of the general vegetation character
 - o There would be some loss of existing hedge and shrub vegetation along the north-western side of the Wilderness roundabout and its replacement with an earthwork and fence acoustic barrier, which would alter the existing character of the roundabout
 - o The existing landscape pattern of the site would be retained and reinforced through the adoption of a layout pattern which reflects the general geometries of the site boundaries and surrounding fields
 - o The introduction of the proposed development, and its relationship with the surrounding and proposed landscape pattern, would continue the existing characteristic of development neighbourhoods within Livingston which are physically and visually contained by a comprehensive landscape pattern of tree belts and open spaces
 - o The development pattern and density proposed would relate well to the development densities of the surrounding areas, and would allow an appropriate provision of open space and landscape framework to be provided within the development, which would strongly assist in integrating the proposed development into its landscape setting.
- 4.12 In overall terms, it is considered that the proposed development would have only limited and minor adverse impacts on landscape character.

4. Landscape and Visual Impact Appraisal

Visual Amenity

Viewpoint Impact Appraisal

4.13 A selection of 6 viewpoints (Figure 12) have been identified to outline the appraisal of changes to the existing visual amenity of the area and visual impact of the proposed development. There is limited public access away from the road network in this area, and the majority of viewpoints are located on the road network of nearby areas. The appraisal of visual impacts is outlined in the Tables below. Photos of the existing view from the selected viewpoints are shown on Figures 13 -18.



Figure 12: Viewpoint locations

4. Landscape and Visual Impact Appraisal

Visual Amenity

Viewpoint 1 - A71 Wilderness Roundabout



Figure 13

Location and Users

The viewpoint is located on the southern side of the A71, immediately west of the Wilderness Roundabout and looks northwards across the A71 to the proposed development site. The view would be seen by road users of the A71 as an oblique view when travelling westwards or eastwards. Pedestrian footpaths are limited in the vicinity of the roundabout,

Existing Visual Amenity

The view looks northwards across the A71 to the remnant tree belt along the southern boundary of the site, which provides some limited screening of views of the site itself, particularly along the northern side of the roundabout where denser informal hedge and shrub planting provides a more

effective visual screen. Views into the site itself extend northwards over open pastures, and provide glimpses of more distant hills well to the north.

Change to Visual Amenity

New planting associated with the landscape framework of the site would be introduced along the southern boundary of the site, supplementing the existing boundary tree belt. Beyond this tree belt, there would be filtered views of the acoustic barrier, which would predominantly screen the proposed development beyond, particularly in views for pedestrians and motorists. The proposed development would be well set back from the road, at a distance of 65m, and the combination of existing and proposed planting, the acoustic barrier and any associated planting,

would limit views of the proposed development in the longer term to its roofscape, with some buildings forming new skylined features above the boundary informal hedge planting and the top of the acoustic barrier. The introduction of the acoustic barrier around the north-western side of the roundabout would result in the loss of the existing informal hedge and shrub planting and its replacement with a prominently located earthwork and fence acoustic barrier.

Appraisal of Impact

Moderate adverse in 2020, reducing to minor adverse in 2025.

4. Landscape and Visual Impact Appraisal

Visual Amenity

Viewpoint 2 - The Wilderness informal woodland footpath



Figure 14

Location and Users

The viewpoint is located within The Wilderness, an area of established woodland to the east of the proposed development, on a well-used but informal footpath which extends generally north-south just inside the western side of the woodland. The view would be seen by all users of the informal path as an oblique view looking westwards.

Existing Visual Amenity

The view comprises of a filtered view between woodland trees and limited undergrowth to the open pastures of the site beyond the boundary of the woodland. The extent of view available will tend to vary with the seasons, and whilst much of the main tree cover is coniferous, the deciduous

understorey planting would restrict views in the summer months, particularly at low level. The central valley feature of the development site is visible as it extends into the central part of The Wilderness.

Change to Visual Amenity

New planting and open space would be introduced along the eastern side of the site, adjacent to the western boundary to The Wilderness, and which would extend the character of the existing woodland, particularly in the longer term. Beyond this planting and open space, there would be glimpses to new buildings, set back 10m from the edge of The Wilderness, with existing and proposed planting substantially limiting views to the new buildings. The

steeper slopes of the central valley feature of the site would be retained as open space and there would be filtered views to the bridge crossing of the valley feature, where the essential profile and form of the valley would be retained. Some limited views of buildings located in the northern section of the site would be available, where they would be likely to appear as new skylined features, although predominantly screened by intervening vegetation.

Appraisal of Impact

Minor adverse in 2020, reducing to negligible in 2025.

4. Landscape and Visual Impact Appraisal

Visual Amenity

Viewpoint 3 - Alba Business Campus



Figure 15

Location and Users

The viewpoint is located at the south-eastern corner of Alba Business Campus, located to the north of the proposed development site, on the edge of an area of car parking associated with one of the campus buildings. The view is looking southwards and would be seen by all staff and visitors to the campus building.

Existing Visual Amenity

The view looks southwards over rising unimproved pastures to the dense woodland belt of the northern section of The Wilderness, and to the canopy outline of the existing tree belt which forms the northern boundary of the site and a skyline feature within the view. The development site itself

is not visible due to the intervening topographic pattern.

Change to Visual Amenity

Most of the proposed development would not be visible from this viewpoint, screened by intervening topography. There would be some very limited views of the proposed development, limited to the roofscape of the most northerly buildings where these are located closest to the northern boundary of the site. These new buildings would be likely to form new skyline features to the south, seen in combination with the canopies of the existing boundary tree planting. New tree planting would supplement the existing northern boundary planting, and in the longer term, would reduce the extent of buildings which would be visible. Much of the view

would be unaffected by the introduction of the proposed development

Appraisal of Impact

Minor adverse in 2020, reducing to negligible in 2025.

4. Landscape and Visual Impact Appraisal

Visual Amenity

Viewpoint 4 - A71 junction with West Calder High School



Figure 16

Location and Users

The viewpoint is located close to the road junction of the access road leading to West Calder High School and the A71, on the segregated footpath/cycleway immediately to the east. The view is looking north-eastwards, and would be seen by pedestrians and cyclists using the segregated footpaths along the A71 and which access the school, and would be generally representative of the view obtained by road users travelling eastwards.

Existing Visual Amenity

The view looks eastwards through remnant tree belt and over stone walls along the A71 to the boundary tree belts along the western edge of the site and around Brotherton Farm. The development site itself is not visible, being screened by a combination of intervening topography, vegetation, walls and buildings.

Change to Visual Amenity

The proposed development is likely to be fully screened by intervening vegetation and buildings, and the nearest proposed buildings are set well back from the western boundary of the site by proposed open space and new tree planting. Any visibility of the proposed development would be limited to minor glimpses of the roofscape of buildings seen in combination with existing trees along the western boundary of the site. There would be very limited change to the existing view.

Appraisal of Impact

Minor adverse in 2020, reducing to negligible in 2025.

4. Landscape and Visual Impact Appraisal

Visual Amenity

Viewpoint 5 - A71 footpath/cycleway at Brucefield Industrial Estate



Figure 17

Location and Users

The viewpoint is located on the footpath/cycleway to the immediate south of the A71, at the north-western corner of the Brucefield Industrial Estate. The viewpoint is set back from the A71 and the view looking north-eastwards would be seen by all users of the footpath/cycleway travelling eastwards.

Existing Visual Amenity

The view looks eastwards along the cycleway and the A71, with the tree planting along the southern boundary of the site restricting direct views into the proposed development site. Some glimpses of the open pastures of the site are available between tree groups, although much of the site itself is not visible.

Change to Visual Amenity

New planting associated with the landscape framework of the site would be introduced along the southern boundary of the site, supplementing the existing boundary tree belt. There would be filtered views to the acoustic barrier, which would predominantly screen the proposed development beyond, set back at a distance of 55m, particularly in views for pedestrians and motorists. The combination of existing and proposed planting and the acoustic barrier and any associated planting would limit views of the proposed development in the longer term, which would be seen as building roofscapes above the acoustic barrier.

Appraisal of Impact

Minor adverse in 2020, reducing to negligible in 2025.

4. Landscape and Visual Impact Appraisal

Visual Amenity

Viewpoint 6 - Track North of Brotherton Farm



Figure 18

Location and Users

The viewpoint is located on an informal farm access track leading north from Brotherton Farm towards Alba Business Campus, at the north-western boundary of the proposed development site. The view is looking south-eastwards and would be seen by users of the track heading south towards Brotherton Farm, although the numbers of users involved is considered to be low.

Existing Visual Amenity

The view comprises of an open panorama across an open, gently rising large field of improved pasture, framed by boundary tree belts to the north and west, and enclosed by the woodland belt of The Wilderness to the east.

Change to Visual Amenity

New tree planting and open space provision would be introduced into the foreground of the view, linking to the existing northern and western boundary planting and forming the setting to the built development which would be set back approximately 100m from the viewpoint. Rows of staggered houses aligned roughly east-west would be visible, interspersed with new tree belts which would filter and limit views of the buildings in the longer term, although initially the proposed development would form a prominent new feature within the view, with some buildings likely to form new skyline features.

Appraisal of Impact

Moderate adverse in 2020, reducing to minor adverse in 2025.

4. Landscape and Visual Impact Appraisal

Visual Amenity

Summary

- 4.14 Of the 6 selected viewpoints assessed, 4 would experience minor or negligible visual impacts due to the screening role of the combination of intervening topography, buildings, walls and vegetation. The remaining 2 viewpoints would experience moderate adverse impacts in 2020, due to views being available to new buildings, some of which would form new skyline features, although, as the proposed planting matures, the 2 occurrences of moderate adverse impact would reduce to minor adverse by 2025.
- 4.15 The combination of existing boundary tree and woodland planting with proposed planting and open space provision along the boundaries of the development site would strongly assist in minimising the visibility of the proposed development in views from the surrounding area. The proposed muted material palette would also strongly assist in reducing the perceptibility of the development within foreground and mid-distance views, by limiting its contrast with its landscape setting.
- 4.16 In overall terms, it is considered that the proposed development would have limited visual impact on its surroundings. (Fig. 19 Masterplan proposals)



Figure 19: Masterplan proposal

4. Landscape and Visual Impact Appraisal

Livingston Countryside Belt

4.17 The introduction of the proposed development would not result in physical coalescence between Livingston and Polbeth, although there would be a reduction in the separation distance between the edges of the built development. The comprehensive landscape structure planting and open space strategy proposed would considerably assist in integrating the proposed development into its landscape context and where the proposed boundary buffer planting and open spaces would ensure that the new built development is well set back into the site when seen from the surrounding area, and in the longer term, the overall impression would be of buildings set within a generous landscape setting. This design approach would ensure that the proposed development would not result in visual coalescence between Livingston and Polbeth, particularly when seen from the A71 where the main perception of visual coalescence is most likely to be experienced. Additionally, the Brucefield Industrial Estate, to the south of the development site and the A71, and to a certain extent the Brotherton Farm complex as well to the north, currently extends the perception of the built edge of Livingston westwards along the A71, such that the perceived separation between Livingston and Polbeth actually only occurs to the west of Brucefield Industrial Estate. Consequently, it is not

considered that the introduction of the proposed development would significantly compromise the existing landscape character of the Livingston Countryside Belt, and its introduction would allow Livingston and Polbeth to continue to be perceived as individual and physically and visually separate settlements. Any impacts on the overall character of the Countryside Belt would be of a minor nature.

Local Landscape Designations

- 4.18 The proposed development site would be located adjacent to but outwith the boundary of The Wilderness ASLC, and therefore development of the site would have no direct effects on the ASLC
- 4.19 The landscape strategy for the development site incorporates boundary buffer areas of open space and tree planting along the eastern boundary with The Wilderness, such that proposed buildings would be well set back from the edge of the existing woodland, and consequently any impacts on the landscape setting of The Wilderness would be limited.
- 4.20 The proposed development incorporates footpath connections into The Wilderness, which would be located in detail to avoid or minimise removal of

existing vegetation. could also have potential impacts on the biodiversity value of the area, in terms of increased numbers of recreational users within the woodland and changes to the local drainage characteristics, although there would also be opportunities to increase the recreational value of the area as part of the proposed development. These issues will have to be addressed by the proposed layout of the development and considered as part of a wider appraisal of the development proposal.

- 4.21 The ASLC which includes The Wilderness has not been included with the candidate SLAs proposed by West Lothian Council as part of their local landscape designation review, and would no longer be classified as a local landscape designation in subsequent Local Plans.
- 4.22 Due to issues of distance, the proposed development would be unlikely to have any impacts on other candidate SLAs within West Lothian.

5. Mitigation Measures and Recommendations

5.1 The landscape and visual impact appraisal has only identified two short term moderate adverse visual impacts which can be considered to comprise significant impacts, with the remaining predicted landscape and visual impacts of the proposed development being either minor or negligible. Mitigation measures to address these moderate impacts are outlined below, together with a range of other mitigation measures and recommendations which would additionally assist in avoiding or reducing any adverse landscape and visual impacts and in further integrating the proposal into its landscape setting and context:

- o Strengthen the extent of proposed planting, and potentially its size when planted, in the area adjacent to the southern boundary, to assist in more quickly creating a planted buffer and filter to views of the development from the A71;
- o Along the southern boundary of the site, undertake native hedge and shrub planting on both sides of the earthwork embankment of the acoustic barrier to minimise the visibility of the associated acoustic fence from the A71 and from within the proposed development;
- o Undertake amenity ground cover planting on the earthwork slope of the acoustic barrier facing the Wilderness roundabout, and associated hedge planting, to provide an appropriate new site frontage to the proposed development and boundary to the A71 corridor;
- o Consider utilising 1-1 1/2 storey houses along the northern and western edges of the development site, and in the vicinity of the entrance road from the A71, to reduce the extent of potential skylining

of new buildings;

- o Proposed planting along the northern boundary buffer area of the site should be positioned primarily to fill the gaps between existing trees, in order to assist in minimising the perceptibility of buildings in views from the north which occur between existing trees;
- o Proposed plant mixes for the open space areas and landscape framework planting should include a small percentage (10%) of coniferous species. This would introduce a small element of winter screening to the proposed development in views from the surrounding area, when existing deciduous trees would be bare;
- o Reinforcing and extending existing understorey planting throughout the buffer areas of the site would assist in minimizing views into the site from the surrounding area, by the infilling of gaps below the existing mature tree canopy level;
- o It will be important to select appropriate species and planting matrices to ensure good plant establishment and rapid growth of nurse and understorey species to provide a suitable environment for the slower growing, long lived, forest trees which should provide the long term landscape framework for the development;
- o Ongoing maintenance of the proposed planting during the initial establishment phase will be crucial, and subsequent landscape maintenance and management will be required to ensure that the structure planting fully establishes and matures to form a setting for the proposed development and to continue and reinforce the existing landscape framework of the site within the wider landscape

setting. A landscape maintenance and management plan should be prepared in support of the planting proposals for the site, and should also address the management of the existing tree resource on the site.

5.2 These mitigation measures and recommendations should be incorporated into any further detailed design development of the illustrative masterplan proposals.

6. Conclusion

- 6.1 A landscape and visual impact appraisal has been undertaken for a proposed residential development located on the south-western edge of Livingston. The site occupies an edge of settlement location, and is located within the Livingston Countryside Belt, and comprises of open agricultural fields bounded by a mix of tree belts and woodland. Despite its open character, the combination of tree lined boundaries, woodland and the detailed topographic pattern of the site considerably restrict the visibility of the site from the surrounding area.
- 6.2 An illustrative masterplan has been prepared which responds positively to the characteristics of the site and its surroundings, incorporating a development with a comprehensive open space and landscape framework provision which responds positively to and reinforces the landscape pattern and character of the site and its surroundings.
- 6.3 The proposed development would have limited impacts on the landscape character of the surrounding area, although the character of the development site itself and its frontage to the Wilderness roundabout would be considerably altered. Visibility of the site from the surrounding area is limited by existing boundary tree belts and woodland, and consequently visual impacts are predominantly limited. Where moderate adverse impacts are identified, these would be short term in nature as proposed planting establishes and matures.
- 6.4 Whilst the site currently comprises part of the Livingston Countryside Belt, it is considered that, with the landscape treatment proposed, the development could be successfully accommodated without compromising the overall landscape character of the Countryside Belt, and that the introduction of the proposed development would not result in the physical and visual coalescence of Livingston with Polbeth. The incorporation of a comprehensive landscape structure and open space pattern which acts as a landscape buffer to the proposed development considerably assists in minimizing the landscape and visual impacts of the proposal on the character of the Countryside Belt. Consequently, the objectives of the Countryside Belt designation would be retained.
- 6.5 A series of mitigation measures and recommendations related to the design proposal are outlined to additionally assist in avoiding or reducing any adverse landscape and visual impacts and in further integrating the proposal into its landscape setting and context.



7N Architects
22 Palmerston Place
Edinburgh EH12 5AL
tel +44 (0) 131 220 5541

www.7Narchitects.com

Your details (mandatory)

Please indicate in what capacity you are making this submission:

- as an individual (and representing your own views)
- as a representative of a private or commercial organisation (and representing the views of that organisation)
- as a representative of a public organisation (and representing the views of that organisation)
- as an agent (and making comments on behalf of other individuals that you represent or third parties)
- other

Please complete the following contact information:

Name	<input type="text" value="Gladman Developments Ltd"/>
Email	<input type="text" value="[REDACTED]"/>
Telephone	<input type="text" value="[REDACTED]"/>
Address	<input type="text" value="[REDACTED]"/>
Organisation name	<input type="text" value="Gladman Developments Ltd"/>
Client's name	<input type="text"/>

Is this the first time you have made a written representation on the Proposed Plan? (mandatory)

- Yes No

If you have previously submitted a site to be considered for development when the council was initially seeking Expressions of Interest (EOI), or commented on the *Local Development Plan* at the *Main Issues Report (MIR)* stage, or made a previous submission to the *Proposed Plan* please provide the reference given to you at that time if known.

EOI & MIR reference number can be found on any email or written communication we may have previously sent you.

Enter EOI (Expression of Interest) reference here	<input type="text"/>
Enter MIRQ (<i>Main Issues Report</i>) reference here	<input type="text"/>

Once form has been completed please sign and date (mandatory)

You do not have to respond to all of the questions set out only those which you feel are of particular relevance to you.

Signature	<input type="text" value="for Gladman Developments Ltd"/>	Date	<input type="text" value="20 November 15"/>
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FOR OFFICE USE ONLY

Proposed Plan reference	<input type="text"/>
-------------------------	----------------------

Please use this form for sections: Foreword; Background; Context; Role and Purpose of Plan; Vision Statement and Aims; The Spatial Strategy (including Policy Framework); Appendices; Glossary; Proposal Maps; Strategic Environmental Assessment (SEA) Environmental Report; Equalities and Human Rights Impact Assessment (EQHRIA); Strategic Flood Risk Assessment (SFRA); Habitats Regulations Appraisal; Transport Appraisal (TA); and Action Programme.

Section title

Page nos.

Paragraph nos.

Please see attached,

Section title

Page nos.

Paragraph nos.

Please see attached.

West Lothian LDP – Proposed Plan 2015 Consultation

Section Title: Vision Statement and Aims

Page Nos: -

Paragraph Nos: -

Comments:

Gladman supports the overall vision of the LDP; capitalising on West Lothian's strategic location and supporting the CDA's, whilst also acknowledging the designation of the whole of West Lothian in the SDP as an SDA and encouraging development to meet regeneration needs and local objectives, whilst always maintaining an effective five-year supply of housing land. Our support for these CDAs and large expansion areas is conditional on them being genuinely effective and forming a part of an overall strategy, made up of these large sites and complementary smaller sites, with the larger sites unlocking infrastructure capacity for the whole of West Lothian.

Section Title: The Spatial Strategy – Development strategy

Page Nos:

Paragraph Nos:

Comments:

Gladman supports the content of Policy DES1

Gladman objects to the wording and aims of § 5.38, and the overall weight given to the HNDA2 in the Council's approach to its housing growth and target process. Whilst HNDA2 does have weight in the decision making process, it is clear that this weight is very limited. Recent appeal decisions by Ministers (notably in cases PPA-400-2045 and PPA-400-2046) that the HNDA is a policy-writing tool, not a decision-making one; and that in any event the policy which it is written to influence is strategic policy, not local policy. As there exists an adopted SDP with which the WLLDP must comply, the issue of reducing housing numbers to accord with the figures in HNDA2 is clearly a subversion of the intention of Ministers in approving the SDP.

Preparing the ground to reduce the LDP housing target to better accord with HNDA2 does not absolve the Council of its' duty to deliver the housing target set out in the current SDP nor does it excuse the Council from its' section 16 duty to maintain consistency between the LDP and the SDP.

Gladman supports the revision of the HLA format (§ 5.40) to show housing need and demand broken down by tenure type. However, this data should be presented in addition to the current format HLA, not instead of the current PAN2/2010 'requirement vs supply' format. Whilst Gladman supports the overall spatial strategy, we are concerned as to whether or not the approach to growth is entirely consistent with the approach to education infrastructure and wider infrastructure issues.

The Council suggests (at, for example §5.42) that it continues to support and promote development and continues to take a longer term view on growth, but at the same time, strongly states that all development is constrained by education infrastructure which must be addressed by the development industry and that an effective housing supply is only provided for "subject to the delivery of new education capacity".

Gladman objects to the format and content of Figure 5 (Page 22), particularly the inclusion of the third column which shows a housing land supply target for the period from 2009-2024. It is clear from SESplan and its Supplementary Guidance, as well as Ministerial correspondence in relation to that plan that the housing land requirement is to be considered as two separate periods from 2009-2019 and 2019-2024. This has been reinforced recently by the decision of Ministers in appeal reference PPA-230-2129 in which it was held that "the calculation of the housing land supply... [across a single 09-24 period]... was not in accordance with the SDP or the SG and that the council behaved unreasonably". It should also be noted that whilst Figure 3 acknowledges the additional requirements for housing allocations set out by the SESplan Supplementary Guidance, there is no further reference to these additional allocations.

In addition, the Council has shown a 'generosity allowance' in their housing land supply figures of 10%, but has not provided the "robust explanation" required by § 116 of SPP to justify this figure. The Council states in § 5.52 that it seeks to meet the requirements of SPP 2010 (as the SDP was developed to conform to that), but that merely states that the supply must be generous, not what the level of that generosity is to be. It is entirely reasonable to expect that the supply position be justified in line with the new guidance. Whilst we recognise that it is for the SDP to set the housing land supply target,

which, under SPP 2014 should include a robustly justified generosity allowance, we would note that as SPP 2014 now represents the up-to-date policy position of Scottish Ministers, West Lothian should, as other SESplan authorities have done, provide the SPP 2014 generosity allowance in the LDP.

We are also concerned that § 5.52 appears to be contrary to the vision of the Council to enable growth and house building, by 'preparing to fail'; identifying that new allocations may not deliver until after 2019, highlighting the inability of the Council to maintain a five-year supply in the short-term, and again highlighting how the whole strategy is in the hands of developers delivering infrastructure on other sites. This is despite a mechanism being in place within the SDP for making up any shortfall in housing land supply.

Our assessment of the current West Lothian housing land supply position, which demonstrates that the Council is failing to maintain a five-year effective housing land supply is below. The table also shows the effect of the range of the generosity allowance on the housing land supply position in West Lothian.

Description		Figure	Figure	Figure
West Lothian Housing Land Supply		No generosity applied	with SPP §116 10% generosity	with SPP §116 20% generosity
Housing requirement <i>Source: SESplan SG Housing Land</i> <i>Period: 2009-2019</i>	(a)	11,420	12,562	13,704
Length of plan	(b)	10	10	10
Annual housing requirement	(c)	1142	1256	1370
Completed plan years	(d)	5	5	5
Total housing completions in plan period	(e)	2,428	2,428	2,428
Net residual housing requirement	(f)	8,992	10,134	11,276
Years remaining	(g)	5	5	5
Net revised annual completion rate	(h)	1,798	2,027	2,255
5 year requirement adjusted against delivery	(i)	8992	10134	11276
Effective housing land supply (HLA 2014)	(j)	4791	4791	4791
Number of years supply	(k)	2.66	2.36	2.12
Percentage of 5 year requirement	(l)	53%	47%	42%

Section Title: The Spatial Strategy – Infrastructure issues

Page Nos:

Paragraph Nos:

Comments:

Whilst Gladman supports the over-arching concept set out in the plan and planning policy more broadly that infrastructure is required for development, and that it is appropriate for development to fund infrastructure, we object to the broad principal set out that all infrastructure should be forward-funded by the development industry.

This places an undue burden on the development industry which will see the desire for growth set out in the LDP trapped in a 'vicious circle' whereby development cannot happen for lack of infrastructure, but infrastructure cannot be funded for lack of development. It is therefore the role of the Council to 'take the first step' and proactively seek infrastructure solutions (for education in particular) in order to unlock development. The Council could then seek to recoup this funding from the development industry, in a similar manner as used in Edinburgh for the tram project and in Midlothian for the Borders Railway. Similarly, the Council must seek to ensure that the Core Development Areas, such as Winchburgh, contribute to the planned growth both by delivering units on their sites, and by delivering the infrastructure provided for by the relevant section 75 agreements and 'unlocking' development across West Lothian.

It is neither sustainable, nor consistent with the planning policy vision for Scotland as a whole, the South East of Scotland SDP area or West Lothian to continue to suggest that the entire LDP strategy hinges on one element of infrastructure provision, and then defer implementation of that to a third party. It is inappropriate in the context of planned-for growth in the SDP area to state that the delivery of education infrastructure on one site is the key to 'unlocking' the entire Council area for development, and that the Council will play no part in the delivery of that solution.

Fundamentally, we are concerned that the proposed plan, whilst allocating land for development, in addition to reaffirming the existing allocations and CDAs, is all conditional on infrastructure solutions (the plan states that "an effective supply is identified, subject to the delivery of new education capacity") which the Council does not seek to deliver itself ("a key requirement will be the need for developers to work together to fund and deliver new schools and key infrastructure" and "in the absence of increased funding from the Scottish Government to the Council, the onus of securing education provision the secure new development falls to developers"). The Council, as education authority, does have a statutory obligation to "*secure that there is made for their area adequate and efficient provision of school education*". As such, whilst there is a role for the development industry to play in assisting in solving education infrastructure issues, the Council is under a statutory obligation to educate pupils in their area, and this is not subservient to the planning regime.

Gladman therefore objects to the wording of Policy INF1, as it places the infrastructure burden solely on developers and the lack of flexibility in the wording will stifle development. The wording should be amended to allow more flexible funding options for infrastructure and the Council should examine ways to deliver and then recoup the costs of, infrastructure required to unlock the development required by the LDP strategy.

Section Title: The Spatial Strategy – Affordable Housing

Page Nos:

Paragraph Nos:

Comments:

Gladman supports the move towards a requirement for 25% affordable housing on residential sites within West Lothian. We would suggest that the Council should allow developers of residential sites to deliver the affordable housing on their sites themselves. This would leave the Council free to pursue its' affordable housing scheme on other sites and ultimately lead to higher levels of delivery of affordable housing, and in particular, social-rented housing, which the Council identifies as being in greatest need. The Council should be far more flexible in its approach to genuinely delivering the full range of affordable housing in addition to meeting their own manifesto goals on the social rented side; more private market housing can deliver more affordable housing integrated into individual developments, as affordable housing does not carry nil-value for private developers. The development industry can deliver a range of housing for the affordable sector, with new models being developed; including low cost, shared equity etc. The approach for only social rented by WLC is too narrow and won't deliver sufficient quantity. Council owned land should be used to deliver significant affordable housing and not sold (as several sites have been recently) for profit for private market housing.

Section Title: Action Programme

Page Nos:

Paragraph Nos:

Comments:

Gladman is concerned that the Action Programme, like much of the LDP places too much reliance on the development industry for funding and action, and that many of the actions identified are listed simply as "TBA" or "developer". This means that the Action Programme is little more than a list of projects required, rather than a programme which genuinely serves to implement the vision, aims and strategy of the LDP. The lack of specific timescales means that accurate development forecasting is impossible.

The Council should acknowledge the receipt/impact of s75 monies and increased council tax revenue from new development in terms of recouping cost for infrastructure which the council may have to bear in the short term.

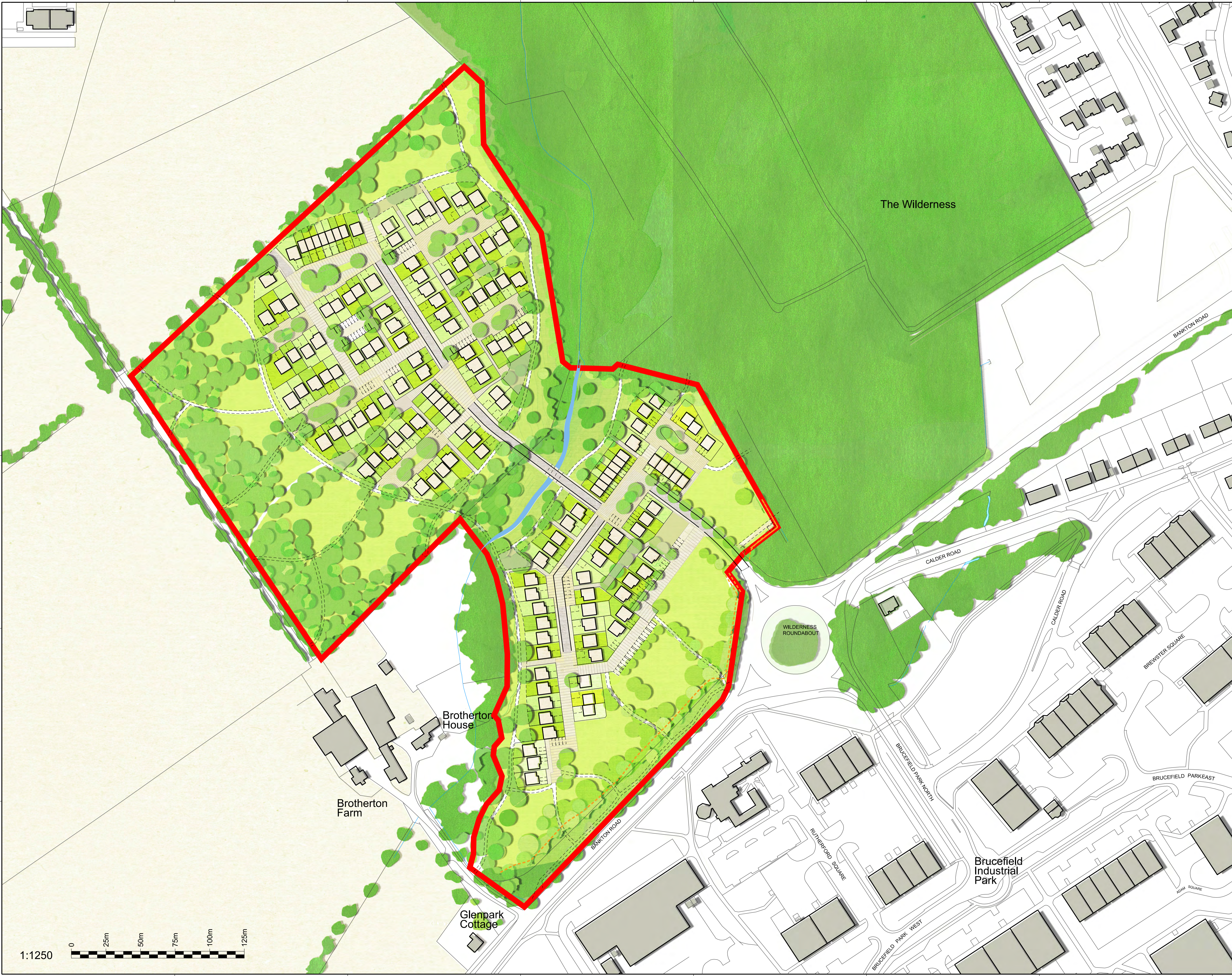
Section Title: LDP Supplementary Guidance (SG) and Planning Guidance (PG)

Page Nos:

Paragraph Nos:

Comments:

Gladman is concerned that much of the guidance, and in particular, that relating to infrastructure is 'to follow', especially when delivery of this is so central to the strategy of the plan. Given the time which has elapsed since the adoption of the SDP with which the LDP conforms, and the time taken to progress the LDP to this point, we would wish to see more detail on the required SG/PG. Given that the purpose of Supplementary Guidance is to deal with the provision of further information or detail in respect of the policies or proposals set out in the plan, we would question whether the amount of supplementary guidance proposed is appropriate, and perhaps suggests that the plan itself is not sufficient.



- General Notes
1. Dimensions are in millimetres unless stated otherwise.
 2. Levels are in metres AOD unless stated otherwise.
 3. Dimensions govern. Do not scale off drawing.
 4. All dimensions to be verified on site before proceeding.
 5. All discrepancies to be notified in writing to 7N Architects LLP.

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■ Site (12.4Ha)

- - - Centreline of acoustic fence

Rev	Date	Reason For Issue	Chk
03	21.01.15	Planning Permission in Principle	FH
02	10.12.14	For Information	FH
01	01.09.14	Planning Permission in Principle	FH
00	04.08.14	For Information	HK

7N
ARCHITECTS

22 Palmerston Place,
Edinburgh, EH12 5AL

tel +44 (0) 131 220 5541
info@7Narchitects.com
www.7Narchitects.com

Client
Gladman Developments
 2 Eilburn Office Park, Eilburn
 Livingston, West Lothian
 EH54 6GR

Keyplan

North

Project
Brotherton Farm
 Livingston

Drawing Title
Illustrative Masterplan

Scale	Paper Size	Date
1:1250	@A1	10.12.14
Project No.	Draw No.	Rev No.
080	PPP003	03

