Proposed West Lothian Local Development Plan Representation

Countryside Belt

Eastoun Farm, Bathgate

On behalf of

Taylor Wimpey

20th November 2015

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1. Introduction

- 1.1 This representation is submitted on behalf of Taylor Wimpey and addresses issues relating to Countryside Belt in respect to land at Eastoun Farm, Bathgate. It should be read in conjunction with our submissions on Housing Land Supply & Demand and the Bathgate Development Framework (as submitted to the MIR in 2014), which support the allocation of the site for housing development.
- 1.2 The site is currently farmland, is 6 hectares in size with a capacity for around 140 new homes. It sits on the north west of Bathgate, within 20 minutes' walk of the town centre, within an area that has undergone significant landscape change over the last century. Up until the late 1970s the land to the south of the site was part of the Hopetoun Colliery and to the north was a branch railway serving local industry. The pit employed several hundred people. It can be concluded that this tract of landscape was heavily influenced by industry and the movement of people until recent times.
- 1.3 Land left behind the pit closure has now been transformed into woodland, maturing well and with a path network running through it. It provides robust containment of the site to the south. The buildings of Eastoun Farm lie on the western edge, and removal of this land from their landholding does not affect their financial viability. The buildings include barns and the farmhouse and together they provide a robust western edge. To the north, recent development is located on the site of the former claypits, providing an existing urban edge. The gap between the farm buildings and the northern developed edge is proposed as structure planting.
- 1.4 When the Development Framework was prepared part of the southern side of the site was designated as Countryside Belt, a policy within the 2009 Adopted Local Plan. No policy for Countryside Belt was shown within the Main Issues Report and the Council has now, within the Proposed Local Development Plan, allocated the whole site as such within an expanded designation. This is highlighted on the accompanying Figure 1.

2. Countryside Belt and Settlement Setting

- 2.1 West Lothian Council has a policy called "Countryside Belt" within the adopted Local Plan of 2009. It covered land around Livingston, between Bathgate and Whitburn, and between Winchburgh and Broxburn. Its main purpose was to protect the settlements against urban sprawl, but to also provide opportunities for recreation and landscape enhancement.
- 2.2 There was no specific discussion paper on "Countryside Belts" within the MIR, nor was there any potential designation areas shown.
- 2.3 Within the Proposed Local Development Plan this designation is expanded to be "Countryside Belts and Settlement Settings". The policy (ENV7) extends the designation to also include East Calder/ Kirknewton and Linlithgow/ Philipstoun. The purpose of this is described as:
 - "Countryside Belts are spatial designations, and critical planning tools somewhat like statutory greenbelts around Scotland's cities, for the purposes of controlling urban spread into the countryside. A key purpose is to maintain the identity of towns by avoiding coalescence. Protecting the setting of settlements is another important purpose of countryside belts"
- 2.4 In effect therefore, the Proposed LDP is proposing to designate large swathes of countryside around its principal towns as greenbelt, but by another name i.e. Countryside Belt. Such an approach is contrary to Scottish Planning Policy, which states in paragraph 49 states that:
 - "For most settlements, a green belt is not necessary as other policies can provide an appropriate basis for directing development to the right locations. However, where a planning authority considers it appropriate, the development plan may designate a green belt around a city or town to support the spatial strategy..."
- 2.5 In our view, there is nothing exceptional about West Lothian's towns that merits equivalent designations to green belt, and it is notable that the Council has not provided any detailed analysis to justify the identification of Countryside Belts in the LDP.
- 2.6 The Council make it clear that the designation doesn't reflect landscape quality, and the strategic purpose of Countryside Belts are to:
 - maintain the separate identity and visual separation of settlements;
 - protect the landscape setting of settlements;
 - promote public access to green space for informal recreation; and

- enhance landscape and wildlife habitat.
- 2.7 The policy states that development will not be permitted within the Countryside Belts without satisfying a list of criteria. What the Council doesn't do, however, is produce any background paper on why these areas have been selected, or the process that was undertaken to define boundaries. Reference is made within Policy Env1 to Supplementary Guidance 'Landscape character and local landscape designations' and 'Green Networks' which may provide some information however these don't appear to have been published yet.
- 2.8 The Council have carried out two published landscape reviews since 2009. The first of these is the West Lothian Local Landscape Designation review, which was prepared in June 2013 by LUC on behalf of the Council. The focus for this study was to:
 - "review the provision of local landscape designations in West Lothian, and to carry out an evaluation of the West Lothian landscape, leading to a new, more robustly justified single tier of Special Landscape Areas".
- 2.9 The study does make reference to the other landscape Council policies but when referring to the Countryside Belt policy states:
 - "The local plan contains other policies which relate to protection of landscape and countryside such as for Countryside Belts and Areas of Special Agricultural Importance. These policies are of relevance to the LLDR, although the review does not make recommendations on these other types of designations.... These will be reviewed separately by the council through the Local Development Plan process."
- 2.10 What is worth noting about the study however, is that it took previous Landscape Character Assessment work as its baseline and divided the area up into landscape units, based on a refinement of those previous studies. The landscape unit into which this area of Bathgate falls was one of the lowest scoring in terms of the landscape quality and character identified criteria.
- 2.11 The second document concerning landscape was prepared by the Council "West Lothian Landscape Character Classification", produced in June 2014 as a background paper to the MIR. One of the reasons the Council publish it is because "development planning requires it to be taken forward as an independent document to support the LLDR [Local Landscape Designations Review] as part of the Local Development Plan process." The document is a record of changes to the Landscape Character Units made to the original Landscape Character Assessment of 1998, with updates due to the LUC Report and a report on wind capacity in 2011. It reports on the Landscape

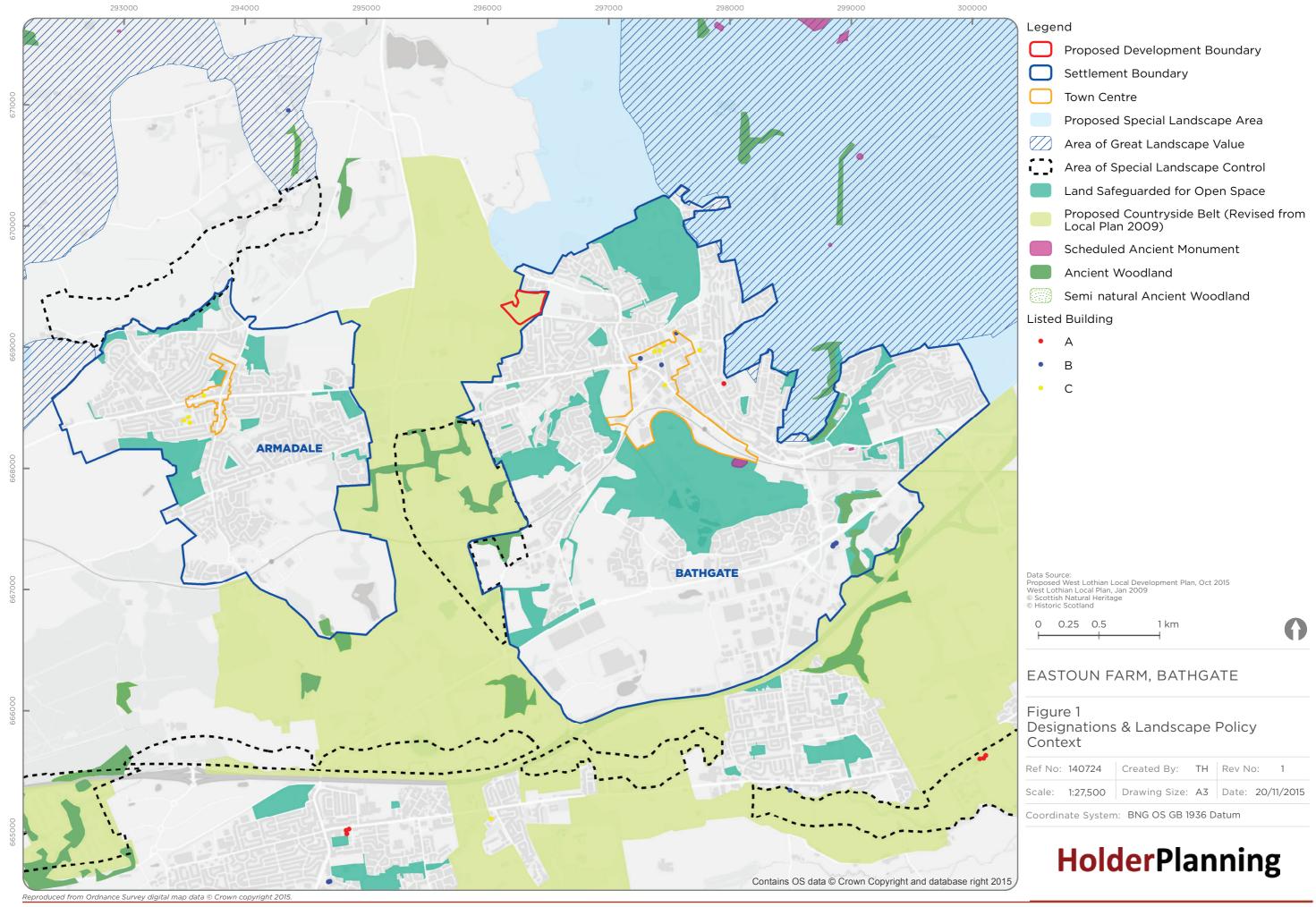
Character Type of the Lowland Plateax: Armadale/ Bathgate into which Eastoun Farm falls but the only reference to this area specifically is that:

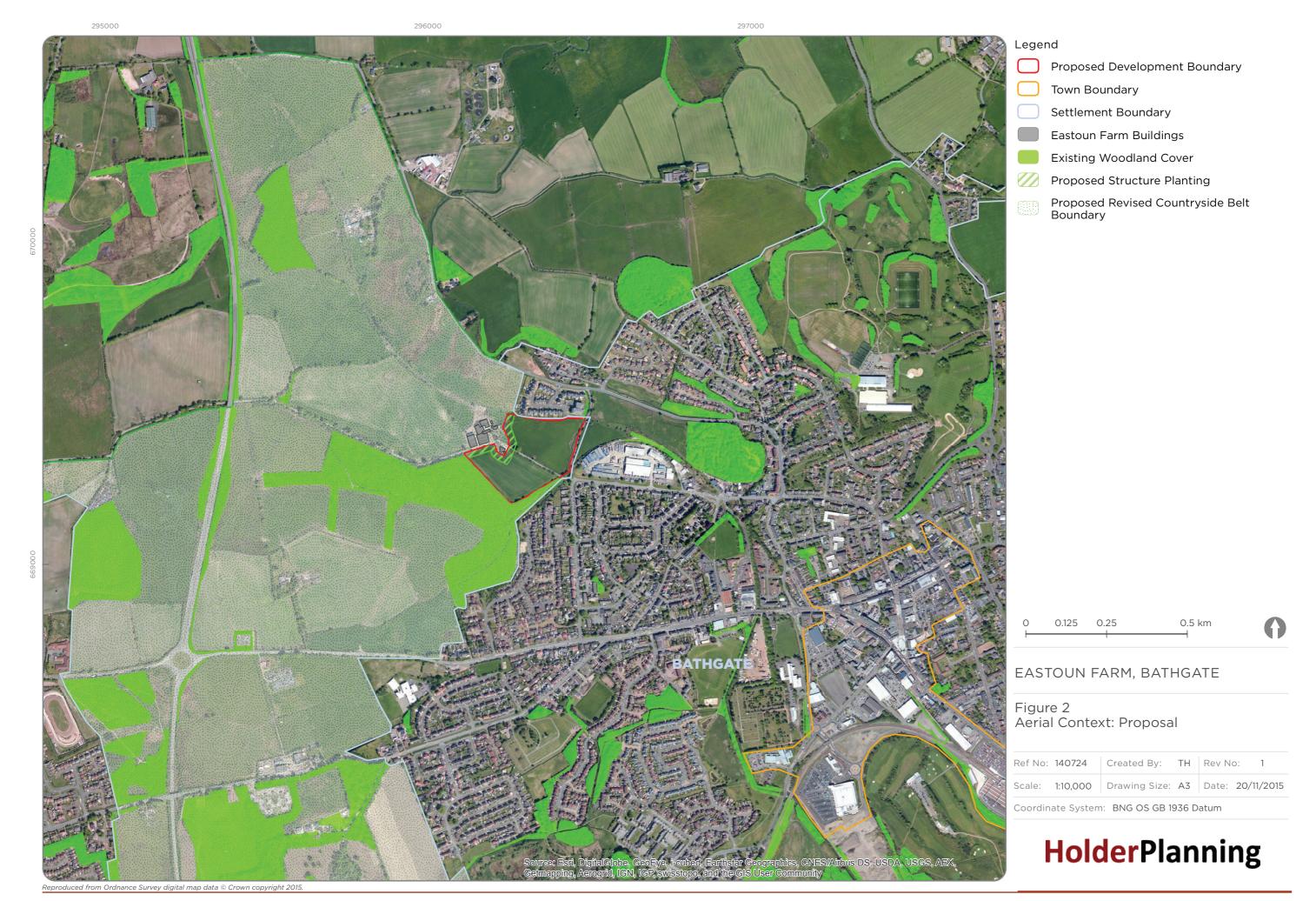
"In the north of the area the restored Easton colliery bing on the west side of Bathgate provides an elevated feature now well integrated into the landscape".

2.12 No links between character and policy are identified within the document, it is a factual report on landscape character.

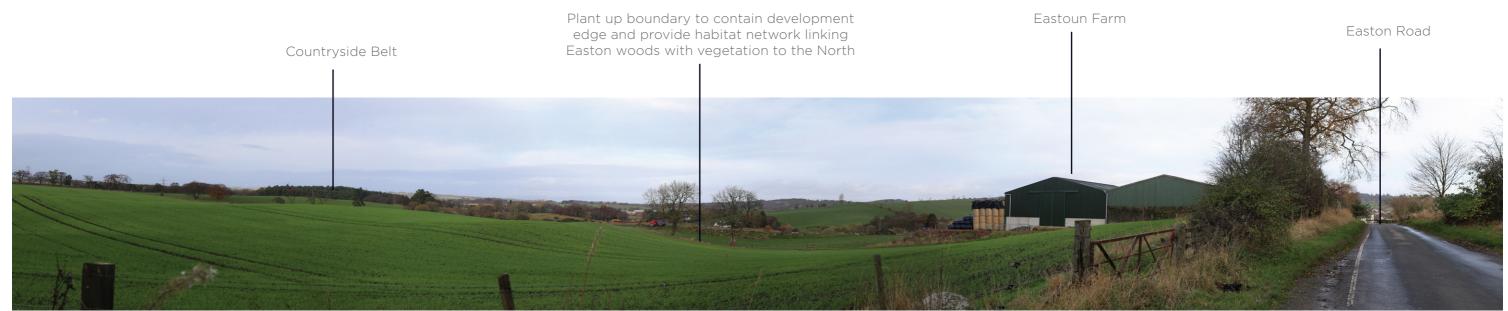
3. Conclusion

- 3.1 We object to the Countryside Belt policy as a matter of principle. It is simply a green belt policy by another name, the blanket use of which is not supported by Scottish Planning Policy.
- 3.2 Eastoun Farm has been designated for the expanded Countryside Belt policy without any justification. In assessing the proposed development sites against the policy objectives the following aspects should be considered:
 - The edge of the proposed development area is some 1.25 km away from the proposed developed edge of Armadale; wider than much of the Countryside Belt corridor and with no issues of intervisibility due to local topography;
 - Release of development at Eastoun Farm would have very limited effect on the setting of the settlement due to existing features and an obvious opportunity to add a structure planting belt in;
 - Public access is already promoted, and well-used, through the paths south of the site boundary within the woodland- there is no access across the current private farmland;
 - The land area is currently low in wildlife value. Development doesn't necessarily preclude improved biodiversity and here there is a good opportunity to create an improved habitat network as can be seen on the attached Figure 2.
- 3.3 If there is to be a Countryside Belt Policy, the Eastoun Farm site should certainly not form part of it. A more robust edge to the Countryside Belt would be made through the allocation of the site for development and a condition of creating a belt of planting along the western boundary which would link Easton Woods with mature pockets to the north and create a definitive boundary to Bathgate.
- 3.4 This is highlighted on the attached photographs shown on Figure 3.





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View from western edge of Bathgate, on Easton Road looking east to proposed development site.



View from the A880 west of Ballencrieff Mill, looking South toward Eastoun Farm

Defining boundaries: the Countryside edge Eastoun Farm