



Have your say on the West Lothian Local Development Plan Proposed Plan Consultation Response Form

West Lothian Council has published its *Proposed Plan* together with supporting documents including an *Environmental Report* (SEA), *Habitats Regulation Appraisal, Strategic Flood Risk Assessment* and *Equalities & Human Rights Impact Assessment*. These can be viewed on the West Lothian Council website at *http://www.westlothian.gov.uk/proposedplan*

If you wish to make representations on the *Proposed Plan* or associated documents, you are encouraged to use the online consultation portal. It's quick and easy and will help us to process representations more efficiently, reducing the overall cost and environmental impact of the exercise.

If you need assistance with completing or submitting your representation online please call the Customer Service Centre (CSC) on 01506 280000. Please advise the Customer Service Centre that your enquiry relates specifically to the *Local Development Plan* and ask for it to be logged and directed to the Development Planning and Environment Team. Someone will contact you. Alternatively you can email us at *wlldp@westlothian.gov.uk* We will endeavour to respond as quickly as possible but in any event within three working days of receiving your enquiry.

It is important that all representations are submitted no later than midnight on Sunday 22 November 2015. Representations received after that time will not be considered.

Your comments should be concise, having regard to paragraph 84 of Scottish Government Circular 6/2013: Development Planning which states that representations should be no more than 2,000 words plus any limited supporting productions.

Data Protection Statement

Please be aware that when you make representations on the Proposed Plan through the consultation portal (and/or in a conventional written format) personal information provided as part of a representation cannot be treated as confidential. Representations require to be made available online and for public inspection at the council's office (this would include your name and postal address but would exclude any information which would be subject to the Data Protection Act 1998 i.e. signature, postal address, telephone number, email).

We are also required to pass these details to the Scottish Government's Directorate of Planning and Environmental Appeals (DPEA). This is because they may at a later date wish to invite you to an Examination of the Proposed Plan to discuss your representation. Before using the consultation portal you should also note that any information posted may be subject to disclosure under the Freedom of Information (Scotland) Act 2002. West Lothian Council will not be liable for any loss or damage arising from or in connection with the disclosure of any information including the disclosure of user generated content.

FOREWORD (page 4)

This introduction by the Leader of the Council establishes the role of the LDP and how it will help deliver the council's core objectives.

BACKGROUND (page 6, paragraphs 1.1-1.5)

Provides a brief historical context to the economic development of West Lothian which helps explain how settlements established and have developed.

CONTEXT (page 7, paragraphs 2.1-2.2)

Provides wider context for the LDP in geographic terms and explains how the LDP fits with the Strategic Development Plan (SDP1).

ROLE AND PURPOSE OF PLAN (page 7, paragraphs 3.1-3.5)

Establishes the role and purpose of the LDP in terms of its being a material consideration in the determination of any planning applications for development in West Lothian and, when adopted by the council, will replace the West Lothian Local Plan. It also sets out what documents the plan must comply with i.e. the Planning etc (Scotland) Act 2006 and what documents will accompany the plan i.e. the Action Programme etc.

VISION STATEMENT AND AIMS (page 8, paragraphs 4.1-4.3)

Establishes the vision for the LDP in terms of outcomes desired over the plan period and identifies the key aims of the plan by individual subject areas i.e. Economic Development & Growth, Community Regeneration, Sustainable Housing Locations, Infrastructure Requirements and Delivery, Town Centres and Retailing, the Natural and Historic Environment, Climate Change and Renewable Energy and Waste and Minerals.

THE SPATIAL STRATEGY (INCLUDING POLICY FRAMEWORK) (page 10, paragraphs 5.1-5.10)

In the context of the Strategic Development Plan (SDP), the LDP identifies West Lothian as being one of thirteen Strategic Development Areas where development will be focused in sustainable locations where infrastructure is either available or can be provided and in locations where there are no environmental constraints.

- Economic Development and Growth (page 12, paragraphs 5.11-5.22)
- Flexibility within traditional industrial estates (page 14, paragraphs 5.24-5.25)
- Enterprise Areas (page 17, paragraphs 5.24-5.25)
- Local business opportunities, small business start-ups and working from home (page 17, paragraph 5.26)
- **Tourism** (page 17, paragraphs 5.27-5.28)
- **Promoting community regeneration** (page 19, paragraphs 5.29-5.35)
- Housing land requirements for the LDP (page 20, paragraphs 5.36-5.49)
- Effective Housing Land and Generous Supply (page 23, paragraphs 5.50-5.53)
- New Housing Sites and Design (page 24, paragraphs 5.4-5.56)
- Strategic Allocations (including previously identified Core Development Area Allocations) (page 25, paragraphs 5.57-5.61)
- Whitburn/Charette (page 26, paragraph 5.62)
- Linlithgow and Linlithgow Bridge (page 26-27)
- Deans South, Livingston; Area for Comprehensive Re-development (page 27, paragraph 5.68)
- **Affordable Housing** (page 27, paragraphs 5.69-5.74)
- Accommodation for Gypsies, Travellers and Travelling Show People (page 29, paragraph 5.75)
- Residential Care and Supported Accommodation (page 29, paragraphs 5.76-5.77)
- Infrastructure Requirements and Delivery (page 30, paragraphs 5.78-5.84)
- Providing for Community Needs (page 32, paragraphs 5.85-5.88)
- **Education** (page 32, paragraphs 5.89-5.92)
- **Healthcare Provision** (page 33, paragraphs 5.93-5.96)
- Sports Facilities (page 33, paragraphs 5.97-5.101)
- **Green Infrastructure and Green Networks** (page 34, paragraphs 5.102-5.105)
- Water and Drainage (page 34, paragraphs 5.106-5.107)
- Travel in and around West Lothian (page 34, paragraphs 5.108-5.112)
- Roads (page 35, paragraph 5.113)

- **A71 Corridor** (page 35, paragraphs 5.114-5.115)
- **A801 Corridor** (page 35, paragraphs 5.116-5.117)
- **A89/A8** (page 35, paragraphs 5.118-5.126)
- **Rail** (page 37, paragraphs 5.127-5.130)
- Walking and Cycling (page 37, paragraphs 5.131-5.132)
- Town Centres and Retailing (page 39, paragraphs 5.133-5.138)
- Landscape Character and Local Landscape Designations (page 41, paragraphs 5.139-5.143)
- Countryside Belts (page 42, paragraph 5.144)
- **Development in the Countryside** (page 42, paragraphs 5.145-5.147)
- **Lowland Crofting** (page 44, paragraphs 5.148-5.152)
- Green Networks, Local Biodiversity Sites and Geodiversity Sites (page 45, paragraphs 5.153-5.155)
- **Forestry** (page 46, paragraphs 5.156-5.163)
- Union Canal (p.49 paragraphs 5.164-5.165)
- Pentland Hills Regional Park (page 49, paragraphs 5.164-5.165)
- Country Parks (page 50, paragraph 5.169)
- Allotments/Community Growing (page 51, paragraphs 5.170-5.171)
- **Temporary/Advance Greening** (page 51, paragraphs 5.172-5.174)
- **Biodiversity** (page 52, paragraphs 5.175-5.180)
- **Geodiversity** (page 53, paragraph 5.181)
- West Lothian Open Space Strategy (page 53, paragraphs 5.182-5.184)
- Historic and Cultural Environment (page 54, paragraphs 5.185-5.187)
- Conservation Areas (page 55, paragraphs 5.185-5.188)
- Former Bangour Village Hospital, Dechmont (page 56, paragraph 5.189)
- Conservation Area at Abercorn/Hopetoun Estate (page 56, paragraph 5.190)
- Other Areas of Built Heritage and Townscape Value (page 57, paragraphs 5.191-5.199)
- Listed Buildings (page 58, paragraphs 5.185-5.187)
- Historic Gardens and Designed Landscapes (page 59, paragraphs 5.200-5.201)
- Historic Battlefields (page 60, paragraph 5.202)
- Archaeology (page 60, paragraph 5.203)
- Scheduled Monuments (page 60, paragraphs 5.204-5.206)
- Public Art (page 61, paragraphs 5.207-5.208)
- Climate Change Measures (page 62, paragraphs 5.209-5.214)
- Low Carbon Development and Renewable Energy (page 63, paragraphs 5.215-5.221)
- Wind Farms and Wind Turbines (page 65, paragraphs 5.222-5.225)
- Energy and Heat Networks (page 66, paragraphs 5.226-5.229)
- Off-gas Grid Areas and Renewable Heat Requirement for New-build Housing (page 67, paragraphs 5.230-5.232)
- The Water Environment and Flood Risk Management (page 67, paragraphs 5.233-5.239)
- Air Quality and Noise (page 70, paragraphs 5.240-5.242)
- Edinburgh Airport (page 71, paragraph 5.243)
- Noise (page 71, paragraph 5.244)
- Contaminated Land (page 71, paragraphs 5.245-5.246)
- Vacant and Derelict Land (page 72, paragraphs 5.249-5.250)
- Minerals and Waste (page 73, paragraphs 5.251-5.256)
- **Site Restoration** (page 75, paragraphs 5.257-5.238)
- Unconventional Gas Extraction including Hydraulic Fracking (page 75, paragraph 5.259)
- Waste (page 76, paragraph 5.260)

DEVELOPMENT PROPOSAL BY SETTLEMENT (page 79)

Provides details of development proposals which are supported by the LDP in each town and village across West Lothian and assigns each one a unique reference for ease of identification.

- Addiewell & Loganlea (page 79)
- Armadale (page 80)
- Bathgate (page 81)
- Blackburn (page 82)
- Blackridge (page 83)
- Breich (page 83)
- Bridgehouse & Bridgecastle (page 83)
- Bridgend (page 83)
- Broxburn (page 84)
- Burnside (page 84)
- Dechmont & Bangour (page 85)
- East Calder (page 85)
- East Whitburn (page 86)
- Ecclesmachan (page 86)
- Fauldhouse (page 86)
- Greenrigg (page 86)
- Kirknewton (page 87)
- Landward area (page 87)
- Linlithgow & Linlithgow Bridge (page 89)
- Livingston (page 90)
- Longridge (page 93)
- Mid Calder (page 93)
- Newton and Woodend (page 93)
- Philpstoun/East & West Philpstoun/Old Philpstoun (page 93)
- Polbeth (page 93)
- Pumpherston (page 93)
- Seafield (page 93)
- Stoneyburn/Bents (page 94)
- Threemiletown (page 94)
- Torphichen (page 94)
- Uphall (page 94)
- Uphall Station (page 94)
- West Calder & Harburn (page 95)
- Westfield (page 95)
- Whitburn (page 96)
- Wilkieston (page 97)
- Winchburgh (page 97)

APPENDICES (page 99)

A number of appendices are included at the end of the LDP which provides additional detail on specific elements of the Proposed Plan.

- Appendix 1 Employment Land Allocations (page 99)
- Appendix 2 Schedule of Housing Sites / Site Delivery Requirements (page 119)
- Appendix 3 Schedule of Land Ownership (page 259)
- Appendix 4 LDP Supplementary Guidance (SG) and Planning Guidance (PG) (page 265)
- Appendix 5 List of Policies (page 273)
- Appendix 6 List of Proposals (page 275)

GLOSSARY (page 280)

An explanation of unfamiliar terms or expressions used in the LDP is provided to assist understanding of the document.

PROPOSALS MAPS

The LDP comprises a series of five maps which define settlement boundaries and illustrate land use zonings.

ACCOMPANYING DOCUMENTS

Alongside the LDP is a suite of documents which are required by statute as part of the preparation and supporting evidence for the LDP.

- Strategic Environmental Assessment (SEA) Environmental Report.
- Equalities & Human Rights Impact Assessment (EQHRIA).
- Strategic Flood Risk Assessment (SFRA).
- Habitats Regulations Appraisal.
- Transport Appraisal (TA).
- Action Programme.

ADDITIONAL COMMENTS

Do you wish to submit any additional comments on the LDP?

Once you have filled in this form, please return to:

Development Planning

Planning and Economic Development

West Lothian Civic Centre

Howden South Road

Livingston

West Lothian

EH54 6FF

Thank you for your participation and contribution.

Your details (mandatory)					
Please indicate in what capacity you are making this submission:						
as an individual (and representing your own views)						
as a repres	as a representative of a private or commercial organisation (and representing the views of that organisation)					
as a repre	as a representative of a public organisation (and representing the views of that organisation)					
as an age	as an agent (and making comments on behalf of other individuals that you represent or third parties)					
other						
Please comple	ete the following contact information:					
Name .	Philip Neaves					
Email						
Telephone						
Address						
Organisation						
name	Felsham Planning and Development					
Client's name	Lochay Homes Limited					
Is this the firs	t time you have made a written representation on the Proposed Plan? (mandatory)					
Is this the firs	t time you have made a written representation on the Proposed Plan? (mandatory) No					
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Please use this form for sections: Foreword; Background; Context; Role and Purpose of Plan; Vision Statement and Aims; The Spatial Strategy (including Policy Framework); Appendicies; 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.	83 Bridgend	Paragraph nos.
Please see attac	ched supporting statement	
Our client wishe	es to register conditional support, subject	to our proposed changes

Section title		
Page nos.	83 Bridgend	Paragraph nos.
Please see atta	ached supporting statement	
Our client wish	hes to register conditional support, subject	to our proposed changes

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

Settlement	Bridgend		
Site address / location	Willowdean		
Site Ref	H-BD1 and HBD2	Page nos.	83 Bridgend
Please see att	ached supporting statement		
Our client wis	hes to register conditional support, subject to	our proposed ch	nanges
Settlement	Bridgend		
Site address	Bridgend Willowdean		
Site address / location		Page nos.	83 Bridgend
Site address	Willowdean	Page nos.	83 Bridgend
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Additional comments				
Please use this space to add any additional comments which have not been covered elsewhere in this questionnaire.				
Please see attached supporting statement				
Our client wishes to register conditional support, subject to our proposed changes				



1 Western Terrace Edinburgh EH12 5QF T +44 (0) 131 337 9640

Submission on Behalf of Lochay Homes Limited

In Conditional support of Willowdean Sites A and B (Ref H-BD 1 and H-BD 2), Bridgend

November 2015

1.0 Introduction

Felsham Planning and Development is instructed to submit a conditional support representation to the Local Development Plan on behalf of Lochay Homes Limited, supporting the proposed allocation subject to changes.

Our client has an option over land at Bridgend, identified in the Local Plan as site ref HBd2/EOI-0011 at Willowdean (South) and to further land at Willowdean, identified as site B and as a new allocation in the Proposed Plan. The landowner made a submission to the Main Issues Report in October 2014, which stated:

We support the continued identification of Bridgend site ref HBd2/EOI-0011 at Willowdean (South) as a 1.12ha site for a development of up to 40 houses. We are in the late stages of concluding a sale to a housebuilder who is standing by with an application ready to submit.

Our client is the identified housebuilder and discussions have been held with your officers in autumn 2015 about submission of a detailed planning application for this allocated site in early 2016.

2.0 Development Plan Allocation

The West Lothian Local Plan allocated site H-BD 1, Willowdean. The site extends to 1.1 ha with a capacity of 40 units. Following the MIR submission further land has been identified in the housing land audit as MIRQ-0162 as Willowdean site B. It extends to 6.2 ha, with an indicative capacity of 90 units.

The proposed plan continues the Local Plan allocation and extends that allocation to include site H-BD 2 Willowdean (Site B). This representation supports these allocations and seeks to show how the sites are suitable, available and viable and satisfy the site effectiveness tests of Circular 2 2010.

The Proposed Plan identifies the delivery requirements for each element of Willowdean. The MIR submission made by the landowner set out the justification for the extended allocation and addressed both the suitability of the site and the potential issues, as follows:

The site is not in an area identified as being at high risk of abandoned underground mines, but further investigation on this will be undertaken to establish this. There are no listed buildings, scheduled ancient monuments or other features of archaeological significance on the site or in the vicinity. The site is not identified by SEPA as being subject to flooding from rivers, the sea, or surface water. The site is not identified by SNH as being within or in close proximity to any features of environmental or ecological significance or protection.

The major benefit of this would be a logical rounding off of the settlement on some marginal agricultural land, and securing development in close proximity to the school, bus stops and village shop. Whilst the site is larger than those being replaced (approx. 6.4ha), we are not proposing development on the whole site. We have identified an approximate developable area of some 3.8ha, capable of accommodating approximately 90 houses, with the balance being landscaping, park and open space to enhance the landscape setting of the development and minimise any adverse impact.

This submission seeks to amplify those comments and to set out the developer's proposed approach to the site.

3.0 Assessment

The revised SPP 2014 sets out the requirement to meet a range of housing needs and to demonstrate that development will be well designed, energy efficient, good quality housing in a sustainable location and will provide land to meet identified housing requirements across all market sectors.

SESPlan identifies the following strategic themes:



1 Western Terrace Edinburgh EH12 5QF T +44 (0) 131 337 9640

- Economic prosperity.
- Sustaining communities.
- Environmental quality.
- Sustainable transport.

These strategic themes are central to the allocation of land and consideration of development proposals. The strategy is:

- To provide sufficient housing land to facilitate an increase in the population of the area with growth distributed amongst settlements to sustain the local service role but conditioned by the capacity of the local environmental infrastructure.
- To ensure that the LDP adopts a phased approach to the release of housing land in order to regulate development.
- To use development activity where possible to promote social inclusion, notably through the provision of affordable and special needs housing.
- To seek to locate new development in locations which minimise the length and number of car trips.

Having regard to SPP, SESPlan and the Local Plan, and the Proposed Local Development Plan we believe that sites H-BD 1 and H-BD 2 meet the criteria for residential allocations and consideration should be given to extending the allocation because of the sites' coverall suitability and capacity:

- 1. The site boundaries are contiguous with the settlement boundary
- 2. Development will satisfy local need is provided
- 3. It is appropriate scale in relation to the settlement
- 4. No coalescence
- 5. Landscape and townscape character protected
- 6. Complements the character of the settlement
- 7. Existing natural features are retained as far as possible and will be supplemented by further boundary planting
- 8. The sites and proposed development are sustainable
- 9. Environmental quality is not compromised
- 10. Development will be of high quality, including buildings, layout and relationship to existing settlement
- 11. There will be a mix of house types, sizes and tenure
- 12. No loss of sports, recreation or amenity space
- 13. Evidence is provided to show that the sites are deliverable

Having assessed the site against the wider policy aims and objectives of the development plan, our comments are as follows:

- Appropriateness of the proposed development- The historic pattern of development has given depth to the village. This proposal continues that development pattern and is the natural next phase of development for the village.
- Suitability for development The site is a natural location for the further expansion of the settlement.
- Impact on character of existing settlements (landscape and townscape character)-the site is visually self-contained. It is proposed to include boundary planting to soften the transition from the countryside to the village.
- Impact on local amenity and integration with natural environment-the site is visually self-contained. There is no reason for the existing relationship with the surrounding countryside to be changed.
- Effect on school provision The housing land audit 2014 shows completions to be significantly below the anticipated rate. Development at Winchburgh is unlikely to reach the critical threshold of 550 units where Linlithgow Academy reaches capacity in the period of the LDP. The maximum anticipated development at Winchburgh in the next 5 years is likely to bring the total development to 487 units. Therefore, there will be sufficient school capacity to accommodate small sites allocated in the development plan. We have discussed this matter with the Council's Education Department. There is scope to support development plan sites taking up education capacity if it can be shown that there is certainty and commitment to build rate and total numbers are known at the outset. This is the case with the subject sites, which will not be subject to further development phases and the developer is willing to commit to a timescale for commencement and completion of development.
- Availability of public transport there is relatively good accessibility to buses serving Winchburgh, Linlithgow, Broxburn and Edinburgh
- Accessibility to town centres there is relatively good accessibility to Linlithgow and Broxburn.
- Protection of natural and built heritage resources (including archaeology) there are no such resources known to exist within the site. We would expect planning conditions to address this matter.
- The capability of incorporating renewable energy sources or energy conservation measures into the proposal Energy conservation is a matter of design and should be identified as a key consideration in the anticipated future master plan.
- Flooding and drainage –the council acknowledges that there is no flood risk
- Drainage capacity providers have confirmed capacity
- Utilities capacity providers have confirmed capacity

The development can realistically be achieved within a 5 year timeframe, or within such timeframe that it helps reduce the pressure on the planning authority to deliver it's already allocated sites. In terms of the effectiveness criteria of Circular 2 2010, we comment as follows:

• Ownership - The site is in the ownership or control of a party which can be expected to develop it or release it for development within 5 years.



1 Western Terrace Edinburgh EH12 5QF T +44 (0) 131 337 9640

- **Physical** The site is free from constraints relating to slope, aspect, flood risk, ground stability or vehicular access which would preclude its development.
- **Contamination** -The previous use has not resulted in contamination.
- Deficit Funding No public funding is required.
- Marketability -The site can be developed in the 5 year period to contribute to the effective land supply. Lochay Homes is committed to purchase the site once satisfactory planning permission is secured
- Infrastructure- The site is free from infrastructure constraints and any required infrastructure commitments can be readily delivered without impacting on viability.
- Land Use Housing is an acceptable use for the site in planning terms and within the context of the site and the village.

4.0 Amendments Sought

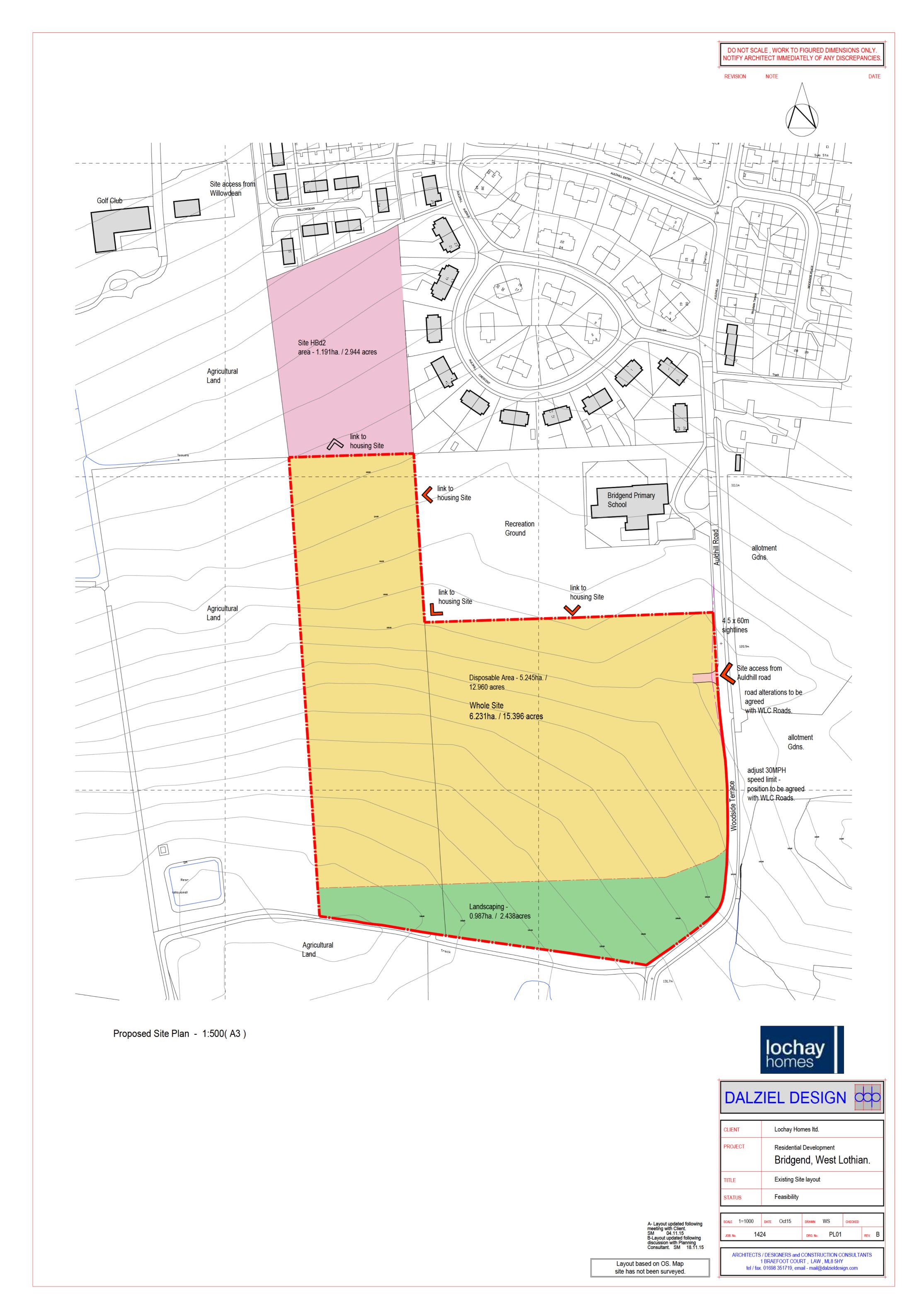
- 1. We wish amendments to be made to the table on page 162 to accurately reflect the characteristics of site H-BD 1:
 - The table on page 162 indicates a requirement for a Flood Risk Assessment (FRA). In our view a robust Surface Water Drainage Strategy taking into account over land flows and incorporating SUDs would be sufficient without needing an FRA;
 - > We are very surprised to see reference to the fact that this site falls within the Edinburgh Airport Safeguarding area (which is shown on the Edinburgh LDP Proposals Map as stopping at Newbridge). This is not mapped on the Proposed LDP maps and the reference should be deleted or if it is appropriate qualified;
 - We challenge the requirement for archaeological Investigations. The Historic Scotland mapping (PastMap) database identifies nothing of any importance/interest on either site. The Council needs to produce evidence to justify this requirement.

The same amendments should be made to H-BD2 (with the exception of FRA).

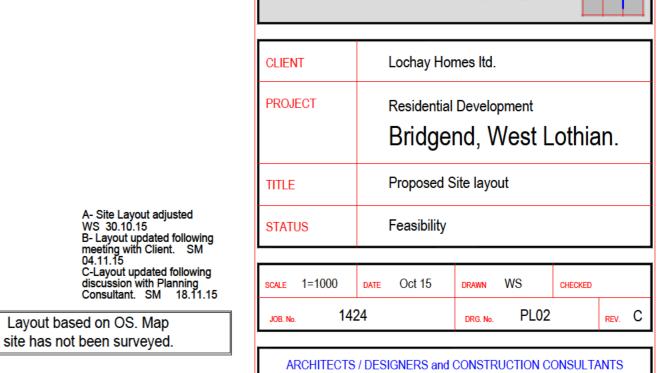
- There is no entry at for H-BD5 in the tables for Bridgend (which run from 162-164). Our client wishes to object to this site. The previous Local Plan Examination considered it to be detrimental to the setting of the settlement and nothing has changed which would result in a different conclusion now. There was no developer at the previous Local Plan Examination and there is no developer now, therefore the site unlikely to be effective. The capacity testing we have undertaken on H-BD2, shown on plans PL 01 REVB and PL 02 REVC submitted with this representation, confirms that the numbers can be comfortably accommodated on the site, in closer proximity to the school, shop and bus services, on an effective and deliverable site, which has commitment from a housebuilder.
- 3. In light of the issues identified above with site H-BD5 and the loss of houses from the land supply and the settlement, we would propose an extension to the proposed numbers (not land) for allocation H-BD 2. The plans our client has prepared for site show a capacity of approx. 130 units. Our client seeks a revision to the table on page 83 to increase the numbers proposed in the allocation to 130.

Our client confirms their intention to start on site as soon as satisfactory planning permission is obtained. The site, including the extended allocation can be developed in the first five years of the plan.

We trust that this submission provides the commitment, clarity and certainty necessary to confirm the effectiveness of the proposed allocations and to support their inclusion in the Local Development Plan.







INDICATIVE LAYOUT ONLY

1 BRAEFOOT COURT, LAW, ML8 5HY tel / fax. 01698 351719, email - mail@dalzieldesign.com