



*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)
- **Pumpherstoun** (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?

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 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="Bob Salter"/>
Email	<input type="text" value="[REDACTED]"/>
Telephone	<input type="text" value="[REDACTED]"/>
Address	<input type="text" value="[REDACTED]"/>
Organisation name	<input type="text" value="Geddes Consulting"/>
Client's name	<input type="text" value="Wallance Land Investment & Management"/>

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

Enter MIRQ (*Main Issues Report*) reference here

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.

Signatur Date

FOR OFFICE USE ONLY

Proposed Plan reference

Wallace Land – Representations to Proposed Plan Summary of Representations

On behalf of our clients Wallace Land Investment & Management (Wallace Land) we object to a number of policies and proposals in the West Lothian Local Development Plan (LDP) Proposed Plan, as set out below. We also submit three additional sites for allocation in the LDP. These are as follows:

- Wellhead Farm, Murieston
- Pumpherston Farm
- Burghmuir, Linlithgow

A number of supporting documents are included with our representations. These are also detailed below.

EOI/MIR submission references

We made submissions on behalf of Wallace Land in response to the West Lothian LDP Main Issues Report. The reference numbers are as listed below.

- EOI-0035
- EOI-0051
- EOI-0055
- EOI-0103
- MIRQ-0184
- MIRQ-0185
- MIRQ-0186
- MIRQ-0187
- MIRQ-0188
- MIRQ-0189
- MIRQ-0190
- MIRQ-0191
- MIRQ-0192
- MIRQ-0193

The Spatial Strategy (including policy framework)

We object to Policy HOU1: *Allocated Housing Sites* and *Figure 5* of the Proposed Plan on the basis that the Council's proposed development strategy as set out in the LDP Proposed Plan does not comply with the requirements of SESplan or Scottish Ministers, as set out in SPP. The attached *Representation about Policy HOU 1: Allocated Housing Sites and Figure 5* sets out our justification in detail, based on the supporting *Assessment of the Housing Land Supply*.

The supporting *Assessment of the Housing Land Supply* demonstrates that the number of homes to be allocated in the LDP Proposed Plan is 5,568 homes for the period 2009 to 2019. The number of homes to be allocated in the LDP Proposed Plan for the period 2019 to 2024 is 4,459 homes. For the period 2024 to 2027, the Council is required to allocate land for 1,612 homes. Over the entire LDP plan period 2009 to 2027, the Council is required to allocate additional effective housing land with a capacity of 11,639 homes.

Taking account of the programming of proposed allocations set out in the LDP Proposed Plan, which is not agreed by Homes for Scotland, the additional allocations required in the Proposed Plan over and above the proposed allocations already identified in the LDP Proposed Plan is 4,072 homes for the period 2009 to 2019.

The further allocations required in the LDP Proposed Plan for the period 2019 to 2024 is 1,849 homes. For the period 2024 to 2027, the Council requires to allocate further land for 1,612 homes.

In total, additional housing land capable of becoming effective over the plan period from 2009 to 2027 is required to deliver 7,533 homes. The allocation of this scale of additional homes is necessary in order to ensure that the LDP Proposed Plan complies with the housing land requirement in full as required by SESplan.

It is apparent from our *Assessment* that there is still a significant and substantial shortfall in the housing land supply in the first plan period to 2019. This matter has been raised and agreed by Reporters in recent appeal decisions.

The Council's development strategy for the LDP Proposed Plan needs to focus on identifying sufficient effective housing land that can contribute to the effective housing land supply in the short term period to 2019, as well as its plan period to 2027.

The consequence of failing to make these additional allocations is that the Council will not be maintaining a 5 year effective housing land supply from the adoption of the LDP. This will mean that the housing land supply policies in the LDP will be considered out of date in accord with SPP paragraph 125. In these circumstances a presumption in favour of development that contributes to sustainable development will apply through the development management process as set out in SPP paragraphs 29 and 32 to 35.

Accordingly, more land should be allocated to ensure that the LDP accords with the requirements of SESplan and SPP. We recommend the inclusion of three additional sites to help ensure these requirements are met. These sites are detailed below.

We object to the other policies listed below on the basis that they do not allow for the maintenance of an effective housing land supply as required by SESplan and SPP and they include unreasonable demands on development that are contrary to the provisions of Circulars 4/1998 and 3/2012. Separate representations set out changes requested to each policy and the justification for these.

1. HOU1: *Allocated Housing Sites and Figure 5*
2. HOU 2: *Maintaining an Effective Housing Land Supply*
3. HOU 3: *Infill/Windfall Housing Development within Settlements*
4. HOU 4: *Windfall Housing Development in Linlithgow and Linlithgow Bridge*
5. HOU 8: *Healthcare and Community Facilities in New Housing Development*
6. INF 1: *Infrastructure Provision and Developer Obligations*
7. ENV 1: *Landscape character and special landscape areas*
8. ENV 2: *Housing development in the countryside*
9. ENV 4: *Loss of prime agricultural land*
10. ENV 7: *Countryside belts and settlement setting*
11. ENV 8: *Green Network*
12. ENV 11: *Protection of the water environment / coastline and riparian corridors*
13. ENV 18: *Protection of Local and National Nature Conservation Sites*
14. ENV 31: *Historic Battlefields: Battle of Linlithgow Bridge (1526)*
15. ENV 32: *Archaeology*
16. EMG 3: *Sustainable Drainage*

Development proposal by settlement

We promote three development opportunities that should be allocated in whole or part to help ensure the LDP meets the Council's housing requirement, as required by SESplan and Scottish Ministers.

These are listed below:

1. Wellhead Farm, Murieston. This site is proposed for development in three phases for a total of 680 homes plus community hub. Each phase is standalone and the site can be allocated in one, two or all three phases together. The whole site can be built out over the 10-year LDP period.
2. Pumpherston Farm. This site is proposed for a mixed use development incorporating up to 1,230 homes, with community hub, including a new Primary School if required by the Council. Separate phases of development would be delivered in phases of 200-300 homes. This site can be allocated in whole or in part with the potential to deliver 670 homes in Phases 1 to 3 in the LDP period.
3. Burghmuir, Linlithgow. This site is proposed for a phased mixed use development for around 600 homes, new motorway slips, and community facilities including hotel, care home, health centre, and sports provision. The whole site can be built out over the 10-year LDP period. Phase A for around 200 homes is capable of coming forward independently.

A separate *Supporting Statement* has been submitted for each of these three sites. These explain each proposal and its environmental impacts. They provide an updated SEA Site Assessment for each site, taking account of mitigation to be delivered by the proposal. They demonstrate that each of the three sites has acceptable environmental impacts and compares favourably with sites allocated in the Proposed Plan. Each of the sites is suitable for allocation in the LDP. Public consultation for each site is described.

We object to the proposed housing allocations in Linlithgow as listed below on the basis of concerns over the effectiveness of the proposed allocations. This is in terms of a lack of primary school capacity; increased traffic impacts leading to more congestion and further deterioration in air quality. The Council has not proposed infrastructure solutions to deal with these matters which are programmed for delivery. The full justification for these objections is set out within our series of site-specific representations.

- H-LL 4 Land east of Manse Road
- H-LL 7 Clarendon House, 30 Manse Road
- H-LL 10 Clarendon Farm
- H-LL 11 Wilcoxholm Farm / Pilgrims Hill
- H-LL 12 Preston Farm

We also object to the proposed strategic employment allocation at Burghmuir in Linlithgow, reference P-43. This is on the basis that there is no market demand for the proposed use. Further, there is an existing site allocated for this use (E-LL 2) which is currently available for this type of development. It is recommended that the Council modifies the Proposed Plan by allocating land at Burghmuir, Linlithgow for the mixed use development promoted by Wallace Land. The supporting *Representation about Proposal P-43 Burghmuir* sets out the full justification for this objection.

List of supporting documents

The following documents are submitted in support of our representations.

The Spatial Strategy (including policy framework)

1. *Assessment of the Housing Land Supply*
2. *Representation about Policy HOU 1: Allocated Housing Sites and Figure 5*
3. *Representation about Policy HOU 2: Maintaining an Effective Housing Land Supply*
4. *Representation about Policy HOU 3: Infill/Windfall Housing Development within Settlements*
5. *Representation about Policy HOU 4: Windfall Housing Development in Linlithgow and Linlithgow Bridge*
6. *Representation about Policy HOU 8: Healthcare and Community Facilities in New Housing Development*
7. *Representation about Policy INF 1: Infrastructure Provision and Developer Obligations*
8. *Representation about Policy ENV 1: Landscape character and special landscape areas*
9. *Representation about Policy ENV 2: Housing development in the countryside*

10. *Representation about Policy ENV 4: Loss of prime agricultural land*
11. *Representation about Policy ENV 7: Countryside belts and settlement setting*
12. *Representation about Policy ENV 8: Green Network*
13. *Representation about Policy ENV 11: Protection of the water environment / coastline and riparian corridors*
14. *Representation about Policy ENV 18: Protection of Local and National Nature Conservation Sites*
15. *Representation about Policy ENV 31: Historic Battlefields: Battle of Linlithgow Bridge (1526)*
16. *Representation about Policy ENV 32: Archaeology*
17. *Representation about Policy EMG 3: Sustainable Drainage*

Development proposal by settlement

18. *Supporting Statement – Wellhead Farm, Murieston*
19. *Supporting Statement – Pumpherston Farm*
20. *Supporting Statement – Burghmuir, Linlithgow*
21. *Representation about Proposed Allocation Reference H-LL 4*
22. *Representation about Proposed Allocation Reference H-LL 7*
23. *Representation about Proposed Allocation Reference H-LL 10*
24. *Representation about Proposed Allocation Reference H-LL 11*
25. *Representation about Proposed Allocation Reference H-LL 12*
26. *Representation about Proposal P-43 Burghmuir*



Supporting Statement

Delivery of Additional Sites

Pumpherstons Farm

November 2015

Supporting Statement

Delivery of Additional Sites

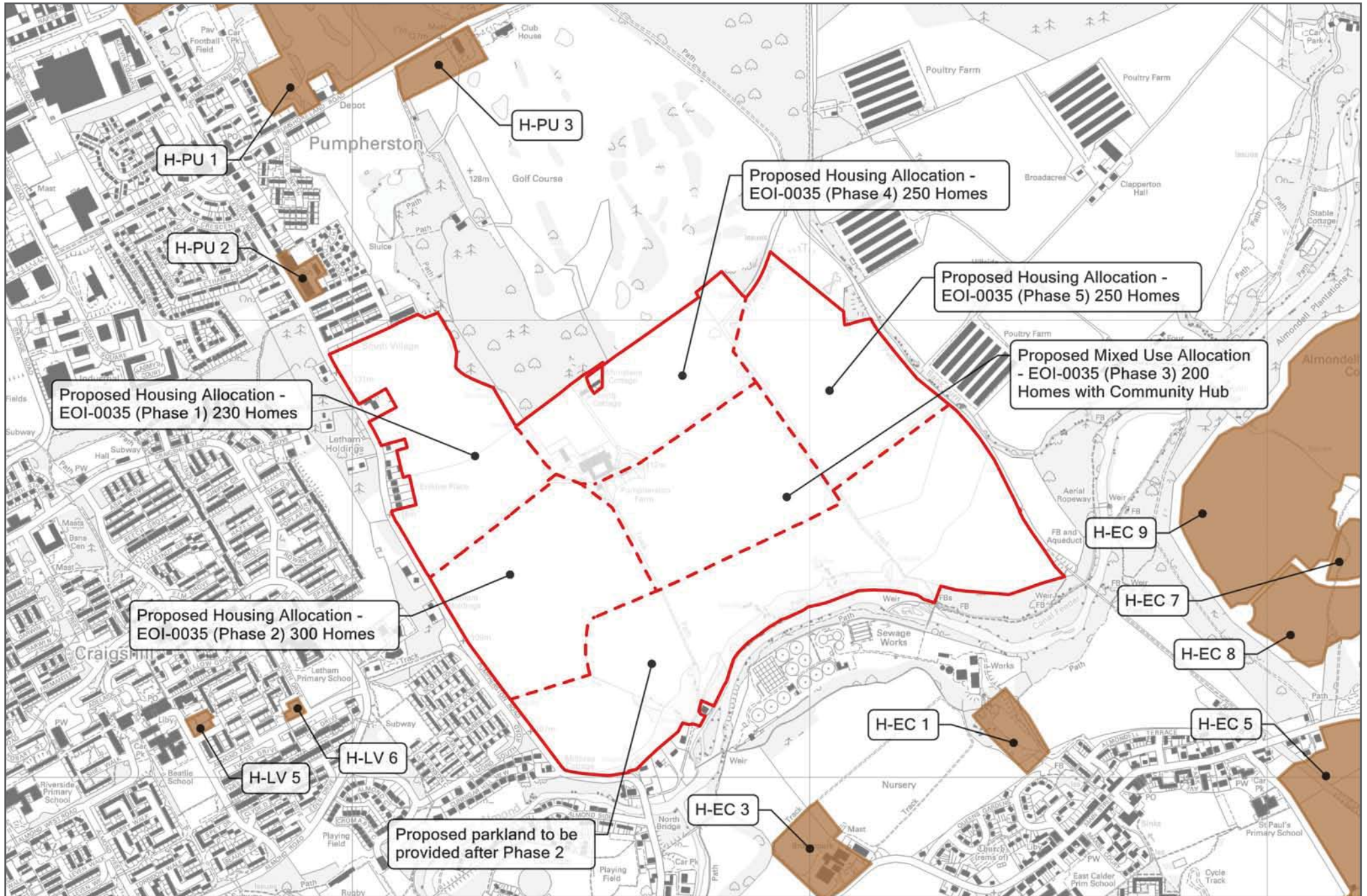




Pumpherson Farm Phase 1 from the south showing the potential for integration into the existing village

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Introduction

This Supporting Statement is in response to West Lothian Council's Local Development Plan (LDP) Proposed Plan (the Proposed Plan). It has been carried out by Geddes Consulting on behalf of Wallace Land Investment & Management (Wallace Land) for the site known as Pumpherston Farm (EOI-0035).

The proposal is for a mixed use development incorporating up to 1,230 homes, with community hub, including a new Primary School if required by the Council.

The whole site was considered by the Council through the Strategic Environmental Assessment (SEA) process (SEA Environment Report Appendix 2). The site reference is EOI-0035.

The Council's Site Assessment confirmed that the environmental impacts of the proposal were acceptable for 11 out of 23 SEA assessment questions.

In response to the Main Issues Report (MIR), Wallace Land submitted representations supported by Development Framework Reports for phases of development at Pumpherston Farm.

The representation for Pumpherston Farm Phase 1 supported the allocation of around 230 homes on a 12.9ha site.

The representation for the remainder of Pumpherston Farm promoted the allocation of the remaining land for around 1,000 homes and community hub in the latter plan period. This Phase also includes 27ha of open space for community use along the riparian corridor of the River Almond.

The Proposed Plan does not propose to allocate any of the site at Pumpherston Farm. Instead, the site is proposed to form part of the *Countryside Belt* around Livingston. No specific justification is provided for this designation.

The *Assessment of the Housing Land Supply* submitted with this representation demonstrates that the Proposed Plan fails to allocate sufficient effective housing land to meet the housing requirements set by SESplan, the approved Strategic Development Plan (2013). Further, that the Council's assessment of the housing shortfall does not comply with Scottish Planning Policy (SPP). Accordingly, more land should be allocated to ensure that the LDP accords with the requirements of SESplan and SPP.

This Supporting Statement confirms that the proposal at Pumpherston Farm is in a sustainable location.

It forms an attractive and logical extension to the southeast side of Pumpherston. This will balance the proposed extension at Drumshoreland to the northwest of Pumpherston. Amenities to be provided will address the requirements for the existing residents of Pumpherston.

The site is within walking distance of existing amenities in the village and its public transport accessibility.

The proposal will meet local housing need and demand, around 300 homes will be affordable. The scale and design of the development will integrate with and be in keeping with the character of the local area.

Wallace Land is submitting an Application for Planning Permission in Principle for Phase 1 in 2016.

The proposal would be built at around 50 private sales per annum from two housebuilders. Including affordable housing, around 670 homes will be built during the LDP period.

This Supporting Statement provides an updated SEA Site Assessment, taking into account additional site appraisals. This demonstrates that the environmental impacts of the Pumpherston Farm proposal are acceptable.

Accordingly, this Supporting Statement demonstrates that this site can be allocated with the potential to deliver 670 homes in Phases 1 to 3 in the LDP period. Each phase can be treated as standalone.

	2009-2019	2019-2024	2024-2027	2009-2027
Setting the LDP Housing Land Supply Target				
LDP Housing Supply Target	11,420	6,590	2,784	20,794
Generosity Allowance (+10%)	1,142	659	278	2,079
LDP Housing Land Requirement	12,562	7,249	3,062	22,873
Meeting the LDP Housing Land Supply Target				
<i>minus</i> Effective Supply	4,802	2,490	1,270	8,562
<i>minus</i> Constrained sites coming forward	0	0	0	0
<i>minus</i> Completions (2009 to 2014)	2,440	0	0	2,440
<i>minus</i> Windfall	320	400	240	960
<i>plus</i> Demolitions	568	100	60	728
<i>equals</i> Total Supply from Existing Sources	6,994	2,790	1,450	11,234
Allocations Required	5,568	4,459	1,612	11,639
<i>minus</i> Programming of Proposed Allocations	1,496	2,610	0	4,106
Shortfall / Surplus	4,072	1,849	1,612	7,533

1. Need for Additional Housing Sites

There are significant issues regarding the methodology adopted by the Council to define the housing land requirement and the effective housing land supply for the LDP Proposed Plan.

The *Assessment of the Housing Land Supply* (the Assessment) examines the methodology and assumptions adopted by the Council. There is no technical supporting paper to support the assumptions adopted by the Council in Figure 5 *West Lothian Housing Supply Target*.

The Council's proposed development strategy will not meet the requirements set out by SPP and the approved SESplan SDP, together with the guidance in PAN 2/2010 *Affordable Housing and Housing Land Audits*.

The analysis in the Assessment confirms the proposed development strategy:

- uses the Housing Need and Demand Assessment (HNDA) for SESplan SDP 2 (referred to by the Council as HoNDA 2), this is not a relevant matter for the LDP Proposed Plan until approval of the next iteration of the SDP as confirmed by Scottish Government;

- adjusts the programming of the agreed Housing Land Audit 2014 without consultation with the house building sector through Homes for Scotland;
- includes programming on Constrained Sites contrary to the requirements of SESplan, SPP and Housing Land Audit 2014;
- does not identify the housing land requirement 10 years post adoption to 2027 in accord with SPP;
- assumes that all proposed allocations will be built out by the end of the plan period and this general assumption is not supported by Homes for Scotland; and
- will not maintain a 5 year effective housing land supply at adoption of the LDP.

These issues need to be addressed by the Council prior to submission on the LDP Proposed Plan to Examination.

The Assessment confirms that there is a significant shortfall in the scale of new housing allocations required to be made in the LDP Proposed Plan.

For the purposes of the LDP Proposed Plan, Figure 5 should be replaced with the table opposite, subject to agreement with Homes for Scotland.

This analysis confirms that the number of homes to be allocated in the LDP Proposed Plan is 5,568 homes for the period 2009 to 2019. The number of homes to be allocated in the LDP Proposed Plan for the period 2019 to 2024 is 4,459 homes. For the period 2024 to 2027, the Council is required to allocate land for 1,612 homes.

Over the entire LDP plan period 2009 to 2027, the Council is required to allocate additional effective housing land with a capacity of 11,639 homes.

The additional allocations required in the Proposed Plan over and above the proposed allocations in the LDP Proposed Plan is 4,072 homes for the period 2009 to 2019. The further allocations required in the LDP Proposed Plan for the period 2019 to 2024 is 1,849 homes. For the period 2024 to 2027, the Council requires to allocate further land for 1,612 homes.

In total, additional housing land capable of becoming effective over the plan period from 2009 to 2027 is required to deliver 7,533 homes.



2. Proposal

The proposal forms an attractive and logical extension on the urban edge of Pumpherston.

This is a mixed use development for around 1,230 homes. This is shown on the plan opposite.

Phase 1 is promoted for residential development (230 homes) and is capable of coming forward independently.

A community hub will be provided in Phase 3. The facilities in the community hub would be agreed with the Council and will include a site for a new Primary School, should this be required. 25% of the housing (around 300 homes) will be affordable housing.

The site will be accessed by vehicles from a new distributor road, accessed from Uphall Station Road, effectively bypassing the existing road.

A key consideration from the public consultation has been how to integrate the new development with the existing village. The proposal has been updated and now provides amenities close to the village, such as a park and allotments. These amenities can be used by existing and new residents.

A network of play areas are proposed, linked by a green network across the proposal. A substantial area of open space (27ha) is to be provided along

the course of the River Almond, forming a new riverside park. This will be provided after Phase 2. This riverside park will be linked into the green network within the proposal and to Pumpherston village.

There is potential to provide connections to the wider countryside, as well as links to the existing Green Network within Livingston. This link is provided by the riverside park.

New homes will be set in an attractive new streetscape incorporating guidance promoted in Scottish Government's *Designing Streets* and *Designing Places*.

The provision of a mixture of house types, streetscape, parking solutions and the integration of greenspaces will create an attractive residential development.

The urban form provides a permeable and logical layout of streets and spaces. It includes shared surface lanes to promote priority pedestrian and cycle movement over the car.

All routes, areas of open space and areas of equipped play within the proposal will be overlooked, ensuring that passive surveillance from adjacent homes provides a safe environment.

SUDS measures will be provided as part of the open space network. All surface water drainage will be in accordance with sustainable drainage requirements to be approved by Scottish Water and the Council. This will restrict runoff rates to greenfield levels.

This site is immediately effective and could accommodate two house builders constructing homes.

At a total of 50 private sales per annum, plus affordable housing, 670 homes would be built during the 10 year LDP period.

Separate phases of development would be delivered in phases of 200-300 homes. This approach would facilitate an on-going effective and viable site.

Wallace Land submitted a Proposal of Application Notice (PAN) in July 2015. Wallace Land is submitting an Application for Planning Permission in Principle for Phase 1 in 2016.

Assessment Areas	Air			Biodiversity			Climatic Factors		Cultural Heritage					Landscape & Townscape			Material Assets		Populatio n Health	Soil	Water		Comment	
	Avoid AQMA areas/ avoid exacerbating air quality of AQMAS/ avoid areas which could become AQMAS?	Have good proximity to jobs/ services (enabling access within walking distance)?	Have good access to existing or proposed public transport?	Avoid adverse effect on integrity of designated international nature conservation sites?	Avoid causing significant effect on designated national/ regional/ local biodiversity sites & ancient woodland / geodiversity sites?	Avoid adverse direct impact on species/ habitats/ or makes a positive contribution to the emerging green network?	Occupy a relatively efficient location in terms of energy consumption	Occupy a location at risk of increased flooding or instability due to climate change?	Avoid adverse (or create positive) effects on listed buildings and/ or its setting?	Avoid adverse (or create positive) impact on scheduled monuments and /or its setting?	Avoid adverse (or create positive) impact on locally important archaeological sites?	Avoid adverse (or create positive) effects on a Gardens & Designed Landscape?	Avoid adverse effects (or create positive) on Conservation Areas &/or other areas of architectural, historic or townscape interest, or historic urban form?	Avoid AGLVs / Areas of Special Landscape Control/ Areas of Special Control	Avoid conspicuous locations that require extensive landscape treatment / structural planting?	Avoid loss of/ adverse effects on public open space/ improve open space provision (quantity/ quality)?	Avoid loss of land important to avoidance of coalescence/ preservation of settlement identity?	Safeguard mineral resources from sterilisation (within Areas of Search)?	Minimise use of "Greenfield" land?	Avoid co-location of sensitive development with industrial facilities/ economic allocations?	Avoid loss of prime quality agricultural land and peatland?	Maintain status of baseline water bodies?	Minimise flood risk (on site or elsewhere)?	
Council Assessment: Pumpherstons Farm (EOI-0035)	✓	X	X	✓	✓	✓	X	X	✓	✓	✓	✓	✓	X	X	X	/	X	✓	X	/	?		

3. Council's SEA Site Assessment

The whole of the Pumpherston Farm site was assessed by the Council as part of the Strategic Environmental Assessment (SEA) process at Main Issues Report (MIR) stage (reference EOI-0035).

A separate Site Assessment was not carried out for the Phase 1 submission made by Wallace Land.

The SEA Site Assessment and Site Appraisal for the Pumpherston Farm site were set out in the *SEA Environment Report Appendix 2*.

The Council has not updated its Site Assessments for the Proposed Plan. Therefore, the *Environment Report* from MIR stage remains the most up-to-date assessment of environmental impact by the Council.

The Council's approach, as set out in the *Environment Report Appendix 2*, is based on a description of the potential environmental impacts arising from the development of a site. This description is then translated into a scale of impact (categories: positive/neutral/uncertain/negative) as part of a SEA Site Assessment. In some cases there is not a clear connection between the Site Appraisal and the SEA scoring.

The SEA Site Assessment (both parts) for the Pumpherston Farm site is presented in this Supporting Statement. The ranking of the environmental impacts

is shown on the page opposite. The text description is shown in the following page.

The Council's Assessment confirmed that the environmental impacts of the proposal were acceptable for 11 out of 23 SEA assessment questions, including all nine questions for the following three SEA topics:

- Biodiversity
- Cultural Heritage
- Population & Health

12 of the assessment questions over six of the SEA topics were not scored positive for the proposal. These are detailed below, with observations.

Air

The site scored negative in terms of, does it ... *Have good proximity to local services (enabling access within walking distance)?* This does not take account of the proximity of the initial phase to existing facilities or access to the new facilities that will be included in the community hub to be provided in a later phase.

The site scored negative in terms of, does it ... *Have good access to existing or proposed public transport?* This does not reflect the proximity of the site to bus services on Uphall Station Road or the potential for Wallace Land to introduce an additional bus service with subsidy into the proposal.

Climatic Factors

The site scored negative in terms of, does it ... *Occupy a relatively efficient location in terms of energy consumption?* The site is south facing and can benefit from solar gain. The proposal includes a community hub with a range of facilities, including a Primary School, reducing the need to travel by car for local services.

The site scored negative in terms of, does it ... *Occupy a location at risk of increased flooding or instability due to climate change?* None of the proposed development is at risk of fluvial flooding according to SEPA's flood mapping. Small areas of pluvial flooding will be resolved through the introduction of SUDS measures.

Landscape & Townscape

The site scored negative in terms of, does it ... *Avoid conspicuous locations that require extensive landscape treatment/structural planting?* The site provides the opportunity to establish a comprehensive green framework to augment the existing planting. This will provide screening for views from the south.

The site scored negative in terms of, does it ... *Avoid loss of/ adverse effects on public open space/ improve open space provision (quantity/ quality)?* This comment fails to take into account the comprehensive open space framework proposed, including a 27ha riverside park.

Proposed use - Housing led mixed use including employment (86.97 ha)	
WLLP reference (if known/applicable) – N/A	
WLLDP reference: EOI-0035	
CONDITION & SETTING	General comments
Present Use Brownfield/greenfield/ruin/mixed	Greenfield
Slope and Shape	Undulating site, irregular shape, sloping down to river corridor
Altitude and Exposure	Exposed throughout, elevates as head north
Un-neighbourly/non conforming uses	Existing farm operation
Relationship to Townscape	Removed from main built up area
Landscape Fit – Intervisibility	Highly visible from Pumpherston Road
Landscape Fit – Skyline	Some limited scope for development perhaps at the northern boundary but otherwise visual intrusion likely
Defined Boundary	Pumpherston Road to the west; river corridor to the south; woodland to the north, rear of residential properties and golf course; woodland corridor and path to the east.
On Site Constraints	Telecommunications mast at Pumpherston Farm.
Ground Conditions/ Natural Features	None apparent; trees and river corridor form the main natural features
Trees	Borders an area of ancient woodland to the south. TPO on trees to the north at Heatherwood.
Protected Species (biodiversity)	None apparent but likely to be present given size of site and proximity to water course and trees
Green Network (CSGN)	N/A
Access/Parking/Roads	Core path plan route 17 runs along east boundary and river corridor to the south. Right of way runs through the site towards to the e eastern boundary, north to south. No existing vehicular access other than farm access to Pumpherston Farm. Visibility issues off Pumpherston Road
Watercourse within vicinity (potential flood risk)	Canal feeder and River Almond to south, potential flood risk identified by SEPA; River Almond on south boundary
Other	Phase 1 Habitats Survey 1993- north west border – cultivated/disturbed land; south east corner – patches of grassland/marsh, swamp and open water. Archaeology trigger zone around Pumpherston Farm – site of doocot and castle? School catchments – Broxburn Academy, St Margaret's, Pumpherston and Uphall PS and St Paul's PLI submission
Conclusion/Summary: Site potential and impact on the community and/or settlement.	May be scope for building on the northern part of the site but small scale development only

Material Assets

Under the *Material Assets* SEA topic, the site scored negative in terms of, does it ... *Avoid loss of land important to avoidance of coalescence/preservation of settlement identity?* The proposal emphasises its connection to Pumpherston. The need to maintain the identity of Pumpherston was raised through public consultation. The proposal continues to maintain the north-south urban structure of Pumpherston.

The site scored neutral in terms of, does it ... *Safeguard mineral resources from sterilisation (within Areas of Search)?* This score is the same for almost all the sites assessed by the Council, including the majority of preferred sites.

The site scored negative in terms of, does it ... *Minimise use of "Greenfield" land?* This score is the same for almost all of the sites assessed by the Council. The design process for Pumpherston Farm will minimise the take-up of greenfield land.

Soil

The site scored negative in terms of, does it ... *Avoid loss of prime quality agricultural land and peatland?* The site is prime quality land (Classes 2 and 3.1). The majority of all urban edge proposed allocations on greenfield site are prime quality land in West Lothian. According to James Hutton Institute soil mapping, the site is not peatland.

Water

The site scored neutral in terms of, does it ... *Maintain status of baseline water bodies?* A majority of sites assessed by the Council scored uncertain or neutral. The proposal will include a SUDS strategy. This will ensure no degradation of water quality and maintain surface water runoff at greenfield levels.

The site scored uncertain in terms of, does it ... *Minimise flood risk (on site or elsewhere)?* None of the proposed development is at risk of fluvial flooding according to SEPA's flood mapping. Small areas of pluvial flooding will be resolved through the introduction of SUDS measures. Accordingly, no area at risk of flooding downstream of the proposal will be affected.

Conclusion

The observations on the Council's Site Assessment in general and specifically for the Pumpherston Farm site confirm that the Council's approach does not fully take into account mitigation measures, which will be delivered by the proposal.

To address this matter, a re-assessment of the site's environmental impact has been carried out. This is explained in the following Section.

In addition, this site re-assessment is also compared to Drumshoreland (reference H-PU 1) to the north of Pumpherston. Drumshoreland was assessed by the Council as part of its Site Assessments at MIR stage. This is explained in Section 5.

SEA Site assessment – Pumpherston Farm

Site Ref	Site Name	Promoter	Air			Biodiversity			Climatic Factors		Cultural Heritage					Landscape & Townscape			Material Assets			P&H	Soil	Water		
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	
EOI-0035	Pumpherston Farm	Wallace Land	✓	X	X	✓	✓	✓	X	X	✓	✓	✓	✓	✓	X	X	X	/	X	✓	X	/	?	WLC Assessment	
EOI-0035	Pumpherston Farm	Wallace Land	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	/	X	✓	X	✓	✓	Geddes Consulting Reassessment	

Scoring Justification for Pumpherston Farm against SEA Factors

Air	Biodiversity	Climatic Factors	Cultural Heritage	Landscape & Townscape	Material Assets	Population and Health	Soil	Water
<p>1. <i>Avoid AQMA</i>: The site is not located within an Air Quality Management Area</p> <p>2. <i>Good proximity to jobs / services</i>: Part of the site (Phase 1) is located within a 10 minute walk (800m) of a number of local services and amenities including a health centre, library, local shops and a primary school. Additional services will be provided in the community hub which provides accessibility for all homes in the proposal.</p> <p>3. <i>Good access to existing or proposed public transport</i>: Phase 1 is located within 400m of existing bus stops located on Uphall Station Road and the developer intends to introduce bus services into the proposal.</p>	<p>4. <i>Avoid adverse affect on designated international nature conservation sites</i>: There are no designated international nature conservation sites on or near the site.</p> <p>5. <i>Avoid significant effect on designated national/ regional / local biodiversity sites & ancient woodland</i>: All areas of Ancient Woodland will be unaffected by the proposal.</p> <p>6. <i>Avoid adverse direct impact on species / habitats or makes positive contribution to emerging green network</i>: The proposed SUDS and open space strategy will improve and enhance the biodiversity of the site as well as linking in with the existing greenspace network. Garden areas will enhance biodiversity within the site</p>	<p>7. <i>Occupy a relatively efficient location in terms of energy consumption</i>: The site is south facing and can benefit from solar gain. The proposal includes a community hub with a range of facilities, including a Primary School, reducing the need to travel by car for local services.</p> <p>8. <i>Occupy a location at risk of increased flooding or instability due to climate change</i>: None of the proposed development is at risk of fluvial flooding according to SEPA's flood mapping. Small areas of pluvial flooding will be resolved through the introduction of SUDS measures.</p>	<p>9. <i>Avoid adverse effects on listed buildings</i>: There are no listed buildings within the site or close to the site.</p> <p>10. <i>Avoid adverse impacts on Scheduled Ancient Monuments</i>: There are no SAMs within the site or close to the site.</p> <p>11. <i>Avoid adverse impact on locally important archaeological sites</i>: There are no cultural heritage listings on the site.</p> <p>12. <i>Avoid adverse effects on Gardens and Designed Landscapes</i>: There are no Gardens or Designed Landscapes within the vicinity of the site.</p> <p>13. <i>Avoid adverse effects on Conservation Areas & or other areas of architectural historic or townscape interest</i>: The site is not located within a Conservation Area.</p>	<p>14. <i>Avoid AGLVs / Areas of Special Landscape Control / Areas of Special Control</i>: The designation of the Almond and Linhouse Valleys AGLV within the site is to be removed in the Proposed Plan. The area of the site which was within the AGLV is to be used as a riverside park.</p> <p>15. <i>Avoid conspicuous locations that require extensive landscape / structural planting</i>: The site has well established boundaries to the north, west and south. The riparian corridor of the River Almond provides screening for views from the south. The site is not in a conspicuous location.</p> <p>16. <i>Avoid loss of / adverse effects on public open space/ improve open space provision (quantity / quality)</i>: The proposal delivers an open space framework which includes a 27ha riverside park.</p>	<p>17. <i>Avoid loss of land important to avoidance of coalescence / preservation of settlement identity</i>: The proposal emphasises its connection to Pumpherston. The need to maintain the identity of Pumpherston was raised through public consultation. There are no direct connections from the proposal into Livingston. The proposal continues to maintain the north-south urban structure of Pumpherston.</p> <p>18. <i>Safeguard mineral resources from sterilisation</i>: The site is not within an Area of Search for opencasting as currently identified in the development plan.</p> <p>19. <i>Minimise use of Greenfield Land</i>: The design of the proposal will minimise the loss of greenfield land.</p>	<p>20. <i>Avoid co-location of sensitive development with industrial facilities / economic allocations</i>: There are no issues with regard to proximity to industrial facilities or economic allocations.</p>	<p>21. <i>Avoid loss of prime quality agricultural land and peatland</i>: The site is located on prime agricultural land as confirmed in the James Hutton Institute Land Capability for Agriculture Mapping.</p> <p>A Soil Management Plan will be prepared to ensure that good quality soil is utilised appropriately, such as in garden areas or areas of greenspace.</p>	<p>22. <i>Maintain status of baseline water bodies</i>: SUDS measures will be incorporated as part of the overall greenspace framework for the site.</p> <p>The SUDS strategy will ensure that there is no degradation of the existing water quality. All baseline water bodies will be unaffected.</p> <p>23. <i>Minimise flood risk (on site or elsewhere)</i>: None of the proposed development is at risk of fluvial flooding according to SEPA's flood mapping. Small areas of pluvial flooding will be resolved through the introduction of SUDS measures.</p>

Note: Assessment informed by scoring by Council for similar greenfield sites in West Lothian Local Development Plan Strategic Environmental Assessment Environmental Report

4. SEA Re-Assessment for Proposal

The Council's Site Assessment for Pumpherston Farm was set out in Appendix 2 of the *Environmental Report* at MIR stage. The site reference was EOI-0035.

No revised SEA Site Assessment work was produced by the Council to accompany the Proposed Plan. Only new sites submitted after the MIR stage were subject to assessment for the Proposed Plan.

A re-assessment of the environmental impacts of the Pumpherston Farm site has been undertaken. This is informed by further technical appraisals and applying sound place making principles which will be implemented on site as mitigation.

This re-assessment of the proposal using the Council's SEA assessment criteria indicates that the site scores more favourably in a number of areas when compared with the Council's Assessment at MIR stage.

This appraisal is set out on the opposite page along with justification. There are nine criteria where this re-assessment differs from the conclusions reached in the Council's Site Assessment.

Air

Phase 1 of the proposal has good proximity to existing services and amenities in Pumpherston. Later phases will include a community hub with

a range of facilities including a Primary School (if required) within the proposal. This community hub will reduce the need to travel by car. There is potential to enhance existing bus services and to route these through the proposal.

Accordingly, the Council's scores are upgraded from negative to positive.

Climatic Factors

The Council's score for ... *Occupy a relatively efficient location in terms of energy consumption* ... is upgraded from negative to positive for the reasons described above under ... *Air*.

The proposed development is not located in an area of fluvial flooding. Any pluvial flooding within the site will be addressed in the SUDS strategy for the proposal. This will take into account climate change impacts.

For this reason, the Council's score is upgraded from negative to positive.

Landscape & Townscape

The site has well established boundaries to the north, west and south. The riparian corridor of the River Almond provides screening for views from the south. The site is not in a conspicuous location.

The proposal delivers an open space framework which includes a 27ha riverside park.

Accordingly, the Council's scores are upgraded from negative to positive.

Material Assets

The proposal emphasises its connection to Pumpherston. The need to maintain the identity of Pumpherston was raised through public consultation. The proposal continues to maintain the north-south urban structure of Pumpherston.

For this reason, the Council's score is upgraded from negative to positive.

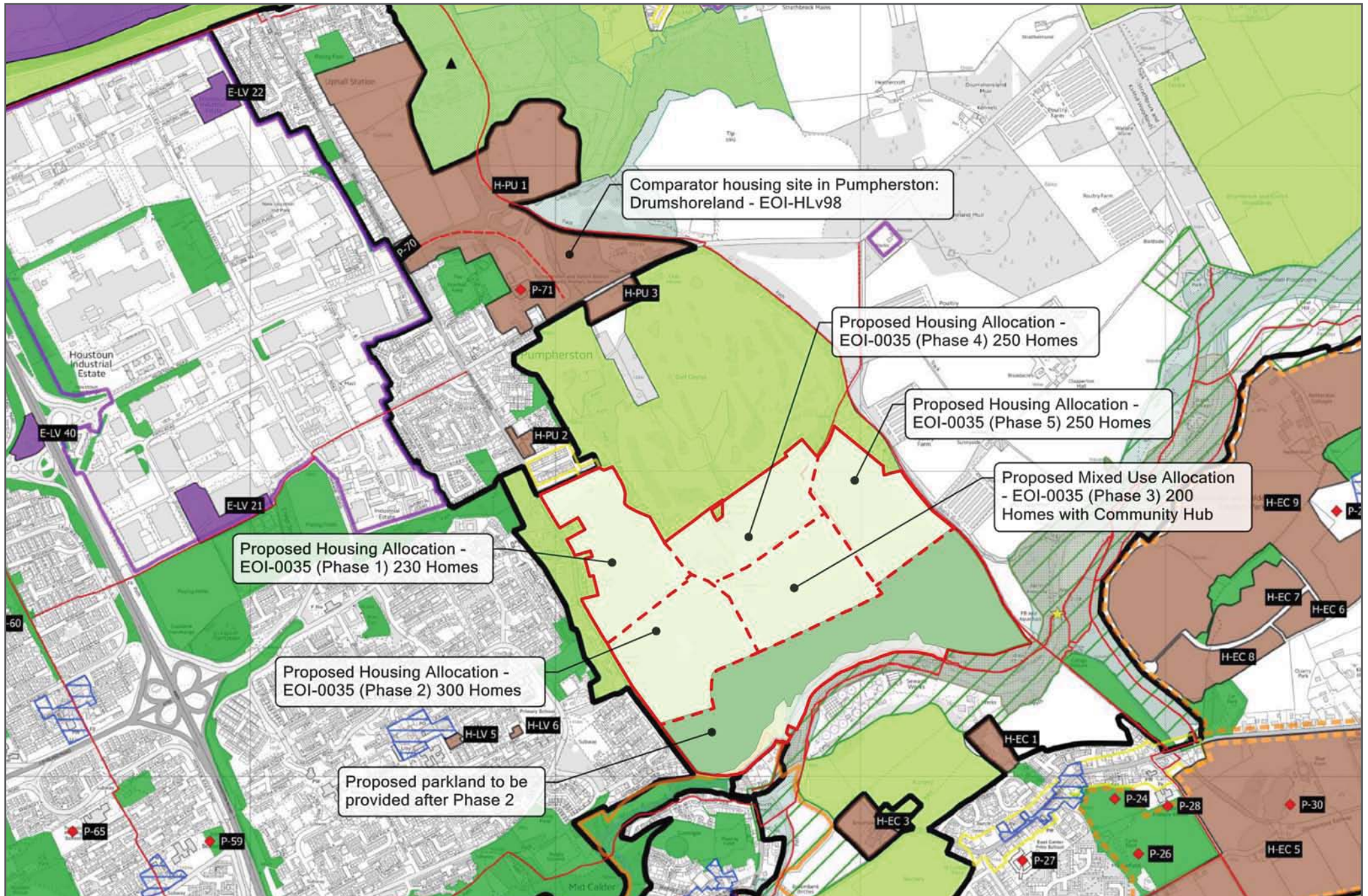
Water

The proposal includes a SUDS strategy which will ensure no degradation of the existing water quality and surface water runoff is maintained at greenfield levels. The site is not at risk of fluvial flooding. Any pluvial flooding within the site will be addressed in the SUDS strategy for the proposal.

Accordingly, the Council's scores have been upgraded from neutral and uncertain to positive.

Conclusion

When the mitigation measures embedded in the design of the proposal are taken into account, then no unacceptable adverse environmental impacts will arise.



5. SEA Assessments for Comparable Allocated Site in Proposed Plan

The Council's Site Assessment scoring for Pumpherston Farm (EOI-0035) is presented below alongside that for another local site proposed for allocation in the Proposed Plan.

This site comparator is located to the northeast of Pumpherston. **Site H-PU 1:** Drumshoreland / Kirkforthar Brickworks. This site is subject to an Application for Planning Permission in Principle which the Council is minded to grant. The site was assessed by the Council at the MIR stage through the SEA process under reference EOI-HLv98.

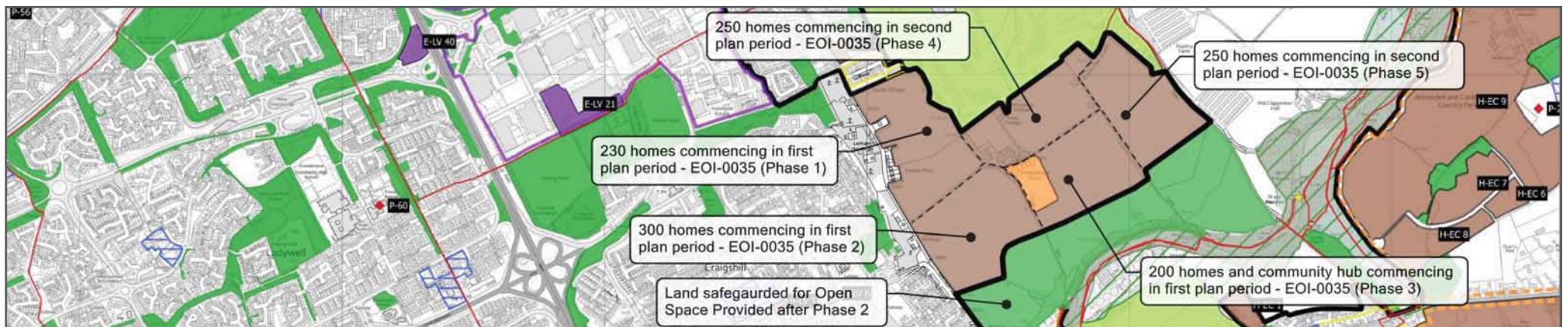
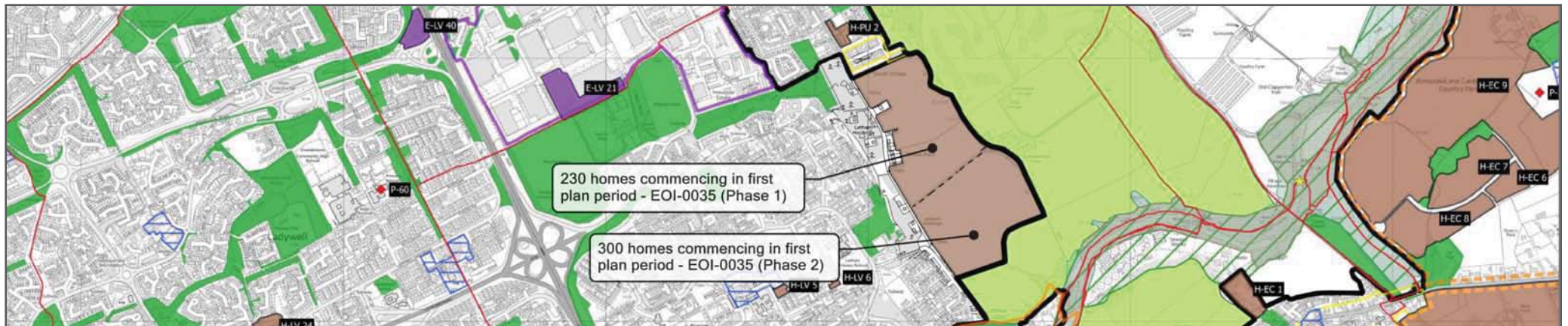
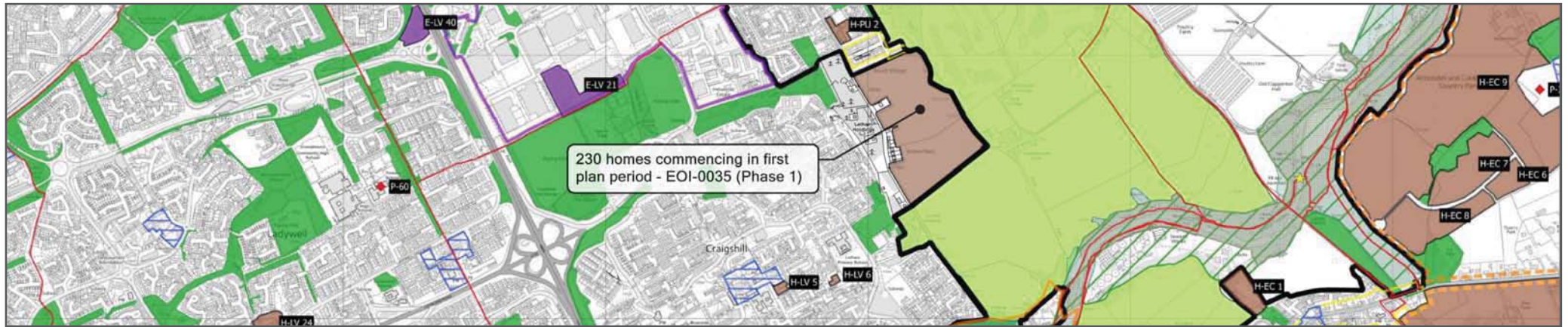
The *positive/neutral/uncertain/negative* scores from the Council's Assessment have also been illustrated numerically to provide a direct comparison between sites.

The table demonstrates that the Re-Assessment of Pumpherston Farm, taking account of mitigation measures, has a similar scale of environmental impact as the allocation at Drumshoreland / Kirkforthar Brickworks.

The proposal at Pumpherston Farm should be considered as a proposed allocation in the LDP.

Development will be on a phased basis with the potential for at least 670 homes in Phases 1 to 3 to be built over the LDP period. Each phase can be treated as standalone.

Assessment Areas	Air			Biodiversity			Climatic Factors		Cultural Heritage					Landscape & Townscape			Material Assets		Population Health	Soil	Water		Overall Assessment	Average Score		
	Avoid AQMA areas/ avoid exacerbating air quality of AQMAs/ avoid areas which could become AQMAs?	Have good proximity to jobs/ services (enabling access within walking distance)?	Have good access to existing or proposed public transport ?	Avoid adverse effect on integrity of designated international nature conservation sites?	Avoid causing significant effect on designated national/ regional/ local biodiversity sites & ancient woodland/ geodiversity sites?	Avoid adverse direct impact on species/ habitats/ or makes a positive contribution to the emerging green network ?	Occupy a relatively efficient location in terms of energy consumption	Occupy a location at risk of increased flooding or instability due to climate change?	Avoid adverse (or create positive) effects on listed buildings and/ or its setting?	Avoid adverse (or create positive) impact on scheduled monuments and /or its setting?	Avoid adverse (or create positive) impact on locally important archaeological sites?	Avoid adverse (or create positive) effects on a Gardens & Designed Landscape?	Avoid adverse effects (or create positive) on Conservation Areas &/or other areas of architectural, historic or townscape interest, or historic urban form?	Avoid AGLVs / Areas of Special Landscape Control/ Areas of Special Control	Avoid conspicuous locations that require extensive landscape treatment / structural planting?	Avoid loss of/ adverse effects on public open spaces/ improve open space provision (quantity/ quality)?	Avoid loss of land important to avoidance of coalescence/ preservation of settlement identity?	Safeguard mineral resources from sterilisation (within Areas of Search)?	Minimise use of "Greenfield" land?	Avoid co-location of sensitive development with industrial facilities/ economic allocations?	Avoid loss of prime quality agricultural land and peatland?	Maintain status of baseline water bodies?	Minimise flood risk (on site or elsewhere)?			
HLV : rumshoreland / irkforfar (A)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	/	✓	X	✓	?	✓			✓	
Council Assessment: Pumpherston Farm (EOI-0035)	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	3	4	1	4	2	4			3.	
Re-assessment: Pumpherston Farm (EOI-0035)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	/	X	✓	X	✓	✓			✓	
	4	1	1	4	4	4	1	1	4	4	4	4	4	1	1	1	3	1	4	1	3	2	1		2.	
	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	3	1	4	1	4	4			3.	



6. Recommendation to Council

Re-assessment of the proposal against the SEA assessment criteria indicates that the site scores more favourably in a number of areas when compared with the Council's Assessment from MIR stage.

This updated SEA Site Assessment is informed by further technical appraisals and applying sound place making principles which can implement mitigation measures on site.

This Supporting Statement demonstrates that development of the Pumpherston Farm site compares favourably in SEA terms with another local site allocated in the Proposed Plan.

The *Assessment of the Housing Land Supply* submitted with this representation demonstrates that the Proposed Plan fails to allocate sufficient effective housing land to meet the housing requirements set by SESplan. Further, it confirms that the Council's assessment of the housing shortfall does not comply with Scottish Planning Policy (SPP).

Accordingly, more effective housing land should be allocated to ensure that the LDP meets the requirements of SESplan and SPP.

This site is immediately effective.

At 50 private sales per annum, including affordable housing at least 670 homes would be built during the 10 year LDP period.

This Supporting Statement also demonstrates that the proposal has been subject to Strategic Environmental Assessment.

When mitigation measures are taken into account as part of the emerging proposal, the Council's Site Appraisal scores can be upgraded.

As shown in this Supporting Statement, the site compares favourably in terms of environmental impacts to another Proposed Allocation in the locality.

Because the site is immediately effective, Wallace Land submitted a Proposal of Application Notice (PAN) for Phase 1 in July 2015. If required, Wallace Land can make available the Pre-Application Consultation Report. An Application for Planning Permission in Principle is expected to be lodged in 2016.

Accordingly, the site of Phase 1 has been subject to additional public consultation beyond that carried out by the Council.

As required in Circular 6/2013: *Development Planning: ... It is useful if promoters of alternative sites obtain and provide information on environmental impact and community opinion as part of their representation, if this does not already exist* (paragraph 84).

This Supporting Statement together with the Pre-Application Consultation Report meets both requirements as set out in Circular 6/2013.

For the avoidance of doubt, development at Pumpherston will be on a phased basis. It has the potential to deliver 670 homes over Phases 1 to 3 during the LDP period.

These separate phases of development can be allocated as a standalone proposal to deliver housing as required.

Each phase would be delivered in tranches of 200-300 homes. This approach facilitates an on-going effective and viable development strategy for the site.

Wallace Land recommends that the site can be allocated as Phase 1 for 230 homes, Phase 1 and Phase 2 for 530 homes, or as all Phases for up to 670 homes plus community hub and riverside park during the plan period.

Revision	Status	Prepared	Checked	Date
V1	DRAFT	Bob Salter	Phil McLean	18/11/2015
V2	FINAL	Bob Salter	Stuart Salter	20/11/2015

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