



*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](mailto: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

Email

Telephone

Address

Organisation name

Client's name

**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.

Signature  Date

**FOR OFFICE USE ONLY**

Proposed Plan reference

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## Wallace Land – Representations to Proposed Plan Summary of Representations

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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

## **Burghmuir, Linlithgow**

November 2015



# Supporting Statement

## Delivery of Additional Sites

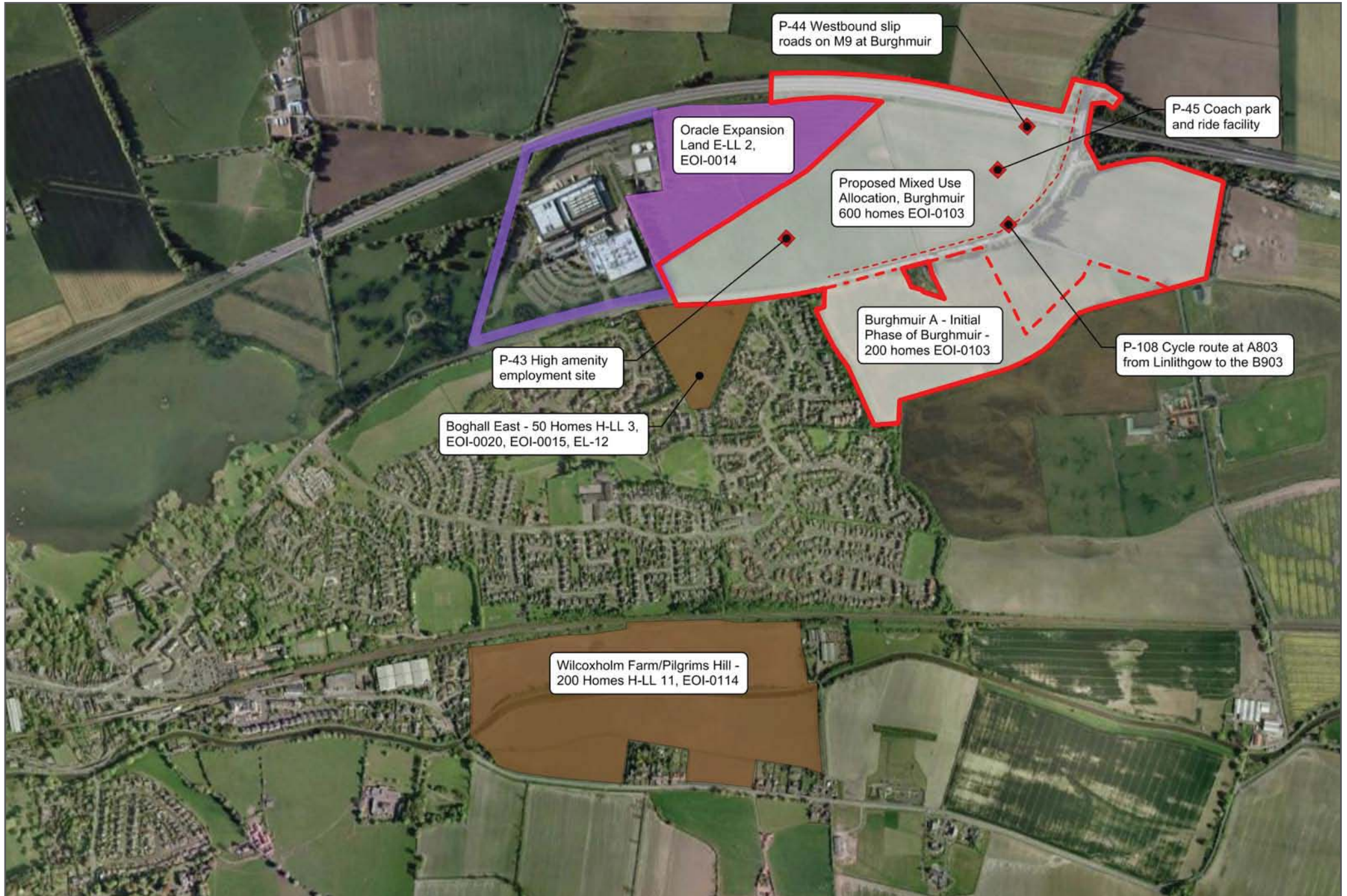




Burghmuir (EOI-0103) looking east along Blackness Road (A803)

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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 Burghmuir (EOI-0103).

This proposal is 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 as well as a local shop. Phase A for around 200 homes is capable of coming forward independently.

The proposal provides westbound slips on the M9 as required by the Council. These will relieve traffic congestion in the High Street and improve air quality.

The whole Burghmuir site was considered by the Council through the Strategic Environmental Assessment (SEA) process (SEA Environment Report Appendix 2). The site reference is EOI-0103. The Council's Site Assessment confirmed that the 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 the Burghmuir site. The representation was for the whole Burghmuir site. A separate representation supported the allocation of 200 homes on part of the site, known as Burghmuir A.

The Proposed Plan does not propose to allocate any of the site at Burghmuir for housing. Instead, the site to the north of Blackness Road is proposed as a strategic development opportunity (reference P-43) for class 4 uses (reference P-43). A separate representation has been lodged in respect of this matter. The remainder of the site is proposed as part of a new *Countryside Belt* to the east of Linlithgow. No 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 Burghmuir is in a sustainable location. It forms an attractive and logical extension to the east of Linlithgow. The site is within walking distance of the town centre and Linlithgow Rail Station.

The proposal will meet local housing need and demand, around 150 homes will be affordable. It will provide a range of other uses that will benefit existing and new residents and will provide local employment.

The scale and design of the proposal will integrate with and be in keeping with the character of the local area. The design of the proposal takes into account the Reporter's conclusions in a recent planning appeal on Burghmuir A (reference PPA-400-2045).

The proposal will be built at around 80 homes per annum, including affordable housing, and would be complete within 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 Burghmuir proposal are acceptable.

Wallace Land is concerned that the Council's Proposed development strategy for Linlithgow has failed to address infrastructure constraints for primary education: traffic impacts leading to congestion and deterioration of air quality. Accordingly, most of the proposed allocations are non-effective. Separate representations have been lodged about this.

Accordingly, this Supporting Statement demonstrates that this site can be allocated for development to enable the LDP to meet its housing requirement. Phase A can be developed independently for 200 homes.

	2009-2019	2019-2024	2024-2027	2009-2027
<b>Setting the LDP Housing Land Supply Target</b>				
LDP Housing Supply Target	11,420	6,590	2,784	20,794
Generosity Allowance (+10%)	1,142	659	278	2,079
<b>LDP Housing Land Requirement</b>	<b>12,562</b>	<b>7,249</b>	<b>3,062</b>	22,873
<b>Meeting the LDP Housing Land Supply Target</b>				
<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> <b>Total Supply from Existing Sources</b>	<b>6,994</b>	<b>2,790</b>	<b>1,450</b>	<b>11,234</b>
<b>Allocations Required</b>	<b>5,568</b>	<b>4,459</b>	<b>1,612</b>	<b>11,639</b>
<i>minus</i> Programming of Proposed Allocations	1,496	2,610	0	4,106
<b>Shortfall / Surplus</b>	<b>4,072</b>	<b>1,849</b>	<b>1,612</b>	<b>7,533</b>

# 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.

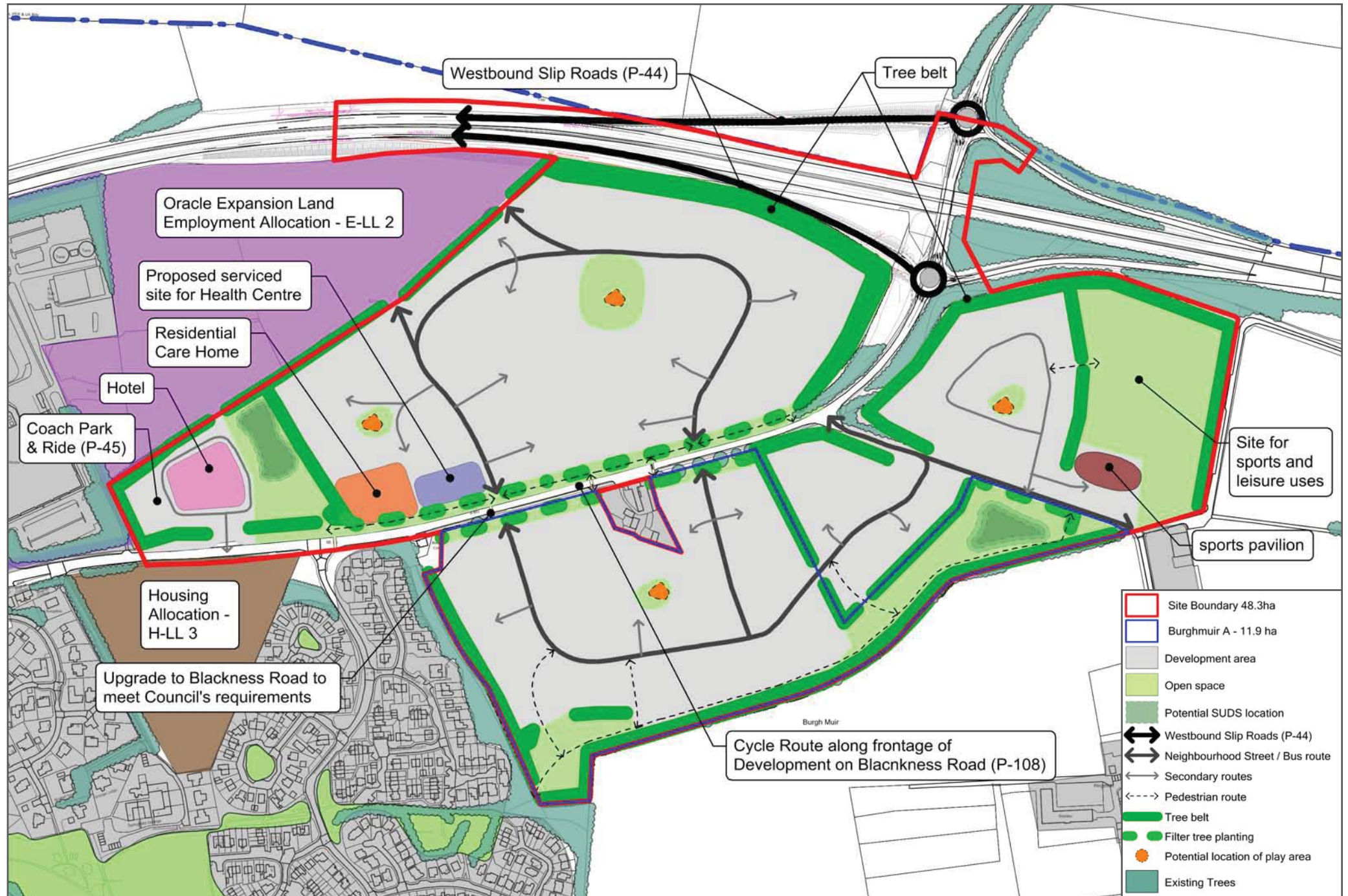
For the purposes of the LDP Proposed Plan, Figure 5 should be replaced with the table opposite, subject to agreement with Homes for Scotland.

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. Updated Proposal

The proposal forms an attractive and logical extension on the eastern edge of Linlithgow. It is a mixed use development for around 600 homes, new motorway slips, and community facilities including hotel, care home, health centre, and sports provision. Phase A for around 200 homes is capable of coming forward independently. This is shown on the plan opposite.

The site will be accessed from Blackness Road forming three separate junctions. A signalised pedestrian crossing will link development north and south of the road and a cycle path provided along Blackness Road.

Wallace Land will deliver the new motorway slips as part of this proposal. The overall cost is around £5M. This forms an integral part of the proposal, should the whole site be allocated in the LDP.

Falkirk Council has approved planning permission for the motorway slip to the north. Transport Scotland has already approved the principle of these slips joining the motorway. Burghmuir is the only proposal which can deliver the motorway slips. These will reduce traffic congestion in the High Street and improve air quality.

The proposal will provide land for non-residential uses. These include a hotel with coach park and ride, care home, serviced site for a health centre, and community sports and leisure as well as a local shop.

A central area of open space is proposed north of Blackness Road. The site for a community sports centre is proposed to the east. A tree belt is proposed around the boundary of the site, strengthened on its southern boundary. This connects into the existing green network. There is potential to provide connections to the wider countryside.

New homes will be set in an attractive new streetscape incorporating guidance promoted in Scottish Government's *Designing Streets* and *Designing Places*. Further attention has been given to maintaining the existing greenspace character along Blackness Road. This local character will be incorporated along Burghmuir's frontage with Blackness Road.

The provision of a mixture of house types, streetscape, parking solutions and greenspaces will create an attractive residential development, meeting settlement and local character. 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.

Phase A for 200 homes is immediately effective and a standalone development. A further phase of 400 homes would follow, delivering the motorway slips by the occupation of the 300th home.

The strong housing market in this location can sustain two builders on site each selling 30 homes per annum. At 60 private sales per annum, plus 20 affordable homes, Phase A could be developed within 3 years. The whole site would be built out during the 10 year LDP period.

Wallace Land submitted an Application for Planning Permission in Principle in July 2013. This was refused by the Council and subsequently dismissed on appeal in July 2015 (reference PPA-400-2045).

The appeal was dismissed on the basis of landscape impact, including landscape treatment on Blackness Road and on the site boundary to the south. The revised proposal takes account of the Reporter's conclusions. It proposes an amended landscape treatment to avoid urbanisation of Blackness Road and to screen views from the south.

Assessment Areas	Air			Biodiversity			Climatic Factors		Cultural Heritage					Landscape & Townscape			Material Assets			Population 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?	
<b>Council Assessment: Burghmuir (EOI-0103)</b>	X	X	X	✓	✓	✓	?	✓	✓	✓	✓	✓	✓	X	✓	X	/	X	X	X	/	?	

### 3. Council's SEA Site Assessment

The whole of the Burghmuir site was assessed by the Council as part of the Strategic Environmental Assessment (SEA) process at Main Issues Report (MIR) stage (reference EOI-0103).

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

The SEA Site Assessment and Site Appraisal for the Burghmuir 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 Burghmuir 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 pages.

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

- Biodiversity
- Cultural Heritage

12 of the assessment questions over seven 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 ... *Avoid AQMA areas/ avoid exacerbating air quality of AQMAs/ avoid areas which could become AQMAs?* This fails to take into account that the proposal delivers new motorway sliproads. This reduces traffic congestion and consequently air quality impacts in the town centre.

The site scored negative in terms of, does it ... *Have good proximity to local services (enabling access within walking distance)?* Springfield Primary School and the local shop is an easy walking distance from the proposal. The Regent Centre, including Tesco, is 1,600m walking distance from the edge of the site. Walking distances to local services are in accord with PAN 75.

The site scored negative in terms of, does it ... *Have good access to existing or proposed public transport?* This fails to take account of proximity to the existing bus services on Blackness Road and the provision of new bus stops. It also ignores the agreement between Wallace Land and the Council to extend the town bus service into the site.

#### **Climatic Factors**

The site scored uncertain 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 is well contained by existing landscape and development to the west and motorway to the north. The proposal provides a comprehensive green framework with additional tree planting to provide screening from views from the south.

<b>Proposed use – Mixed use development including retail, housing, hotel, care homes and greenspace plus associated infrastructure works including west facing slip onto M9 (site area 48 Ha) circa 600 homes</b>	
<b>WLLP reference (if known/applicable) – n/a</b>	
<b>WLLDP reference: EOI-0103</b>	
<b>CONDITION &amp; SETTING</b>	<b>General comments</b>
Present Use Brownfield/ greenfield/ruin/mixed	The site is located outwith the settlement envelope of Linlithgow to the northeast of the town centre. The site is currently in agricultural use and is shown in the WLLP as white land. Blackness Road runs through the centre of the site.
Slope and Shape	The site is broadly rectangular in shape. The site is relatively flat and slopes down from north east to south west.
Altitude and Exposure	The northern part of the site is slightly higher than the surrounding area therefore more exposed.
Un-neighbourly/ non conforming uses	Adjoining uses are agricultural and employment to the north and south, employment to the west and the M9 motorway to the east.
Relationship to Townscape	The site is outwith the settlement boundary therefore has no relationship to the townscape. Development at this location would extend the settlement boundary to M9.
Landscape Fit – Intervisibility	Built development would change the character of the area in particular the entrance to Linlithgow from the east. The site is visible from the surrounding area.
Landscape Fit – Skyline	The northern part of the site is on the skyline.
Defined Boundary	The boundaries of the site are defined by the M9 and employment allocation ELI8 to the north, residential, hedgerow and Blackness Road to the south, Blackness Road to the east and employment allocation ELI8 and Sun Microsystems to the west.
On Site Constraints	No visible constraints.
Ground Conditions/ Natural Features	Phase 1 Habitat survey North eastern area grassland and marsh.
Trees	There is mature hedgerow around the boundary of the site and a few mature trees. Management and retention should be discussed with the council's arboricultural officer.
Protected Species (biodiversity)	Unknown / will require to be checked with SNH. Scottish Natural Heritage have been consulted on this site.
Green Network (CSGN)	No significant issues.
Access/Parking/Roads	There are two existing farm access points one on Blackness Road and one on the road to Kingsfield Farm. The proposal includes a new motorway junction.
Watercourse within vicinity (potential flood risk)	There are no watercourses within the vicinity of the site.
Other	There may be some constraints within the local catchment schools. The proposed development is a windfall site and such sites can only be supported if there is reasonable expected capacity within schools to accommodate the proposed development plus development that is already committed and development sites that are allocated in the adopted or emerging development plans. PLANNING APPLICATION 0095/P/12 (Mixed use development including housing, hotel, care homes and green space plus associated infrastructure works including west facing slip onto M9 (site area 48Ha) circa 600 homes for Wallace Land – application withdrawn 16/04/12: <a href="http://planning.westlothian.gov.uk/WAM133/showCaseFile.do;jsessionid=689B350DF5312F0F17D691C9E1AB1DED?action=show&amp;appType=Planning&amp;appNumber=0095/P/12">http://planning.westlothian.gov.uk/WAM133/showCaseFile.do;jsessionid=689B350DF5312F0F17D691C9E1AB1DED?action=show&amp;appType=Planning&amp;appNumber=0095/P/12</a> This application was being reported to West Lothian Planning Committee on 17/04/12 and was recommended to be refused. PLANNING APPLICATION 0518/P/13 – Part of EOI applied for, for Planning permission in principle for a 12.6 ha residential development including green space, SUDS, access roads and associated infrastructure at Land at Burghmuir A – was refused by West Lothian Planning Committee on 13/11/13 – may be subject to an appeal. <a href="http://planning.westlothian.gov.uk/WAM133/showCaseFile.do;jsessionid=E98A17D583DE3170FCC32BC29690B42B?action=show&amp;appType=Planning&amp;appNumber=0518/P/13">http://planning.westlothian.gov.uk/WAM133/showCaseFile.do;jsessionid=E98A17D583DE3170FCC32BC29690B42B?action=show&amp;appType=Planning&amp;appNumber=0518/P/13</a>
<b>Conclusion/Summary: Site potential and impact on the community and/or settlement.</b>	The development of the site would have the effect of extending Linlithgow to the east.



### 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 connects to Linlithgow by path, bus, the provision of facilities for the wider community within the site, and through integration in terms of settlement and local character.

The updated proposal has taken into account feedback from the appeal decision and maintains the setting and identity of the town. It does not cause coalescence.

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 Burghmuir will minimise the take-up of greenfield land.

### Population and Health

The site scored negative in terms of, does it ... *Avoid co-location of sensitive development with industrial facilities / economic allocations?* The economic development allocation to the north (reference E-LI 3) is mutually compatible with the proposed land uses adjacent.

Economic development on this site will not adversely affect the amenity of adjacent residential development.

Access and drainage for the Oracle Expansion Land (reference E-LL 2) will be provided through the Burghmuir site. This will provide financial savings and increase the effectiveness of this allocation.

### 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 (Class 3.1). All greenfield urban edge allocations are prime quality land in Linlithgow. The design of Burghmuir minimises the loss of prime quality land.

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 includes 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 is at risk of flooding downstream of the proposal.

### Conclusion

The Council's Site Assessment for Burghmuir does not take into account the discussions and agreements between Wallace Land and the Council about the proposal. This confirms that the Council's approach does not take into account all 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 Wilcoxholm Farm / Pilgrims Hill (reference H-LL 11) to the southeast of Linlithgow. This site was assessed by the Council as part of its Site Assessments at MIR stage. This is explained in Section 5.

It is noted that the Council intends to allocate the land to the north of Blackness Road as a strategic employment opportunity (reference P-43).

This recognises the suitability of this part of Burghmuir to be developed, subject to mitigation measures such as woodland planting and other landscape measures.

A separate representation has been made to the Council about the allocation of the site for this use.

**SEA Site assessment – Burghmuir, Linlithgow**

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-0103	Burghmuir, Linlithgow	Wallace Land	X	X	X	✓	✓	✓	✓	?	✓	✓	✓	✓	✓	X	✓	X	/	X	X	X	/	?	WLC Assessment	
EOI-0103	Burghmuir, Linlithgow	Wallace Land	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	X	✓	X	✓	✓	✓	Geddes Consulting Reassessment	

**Scoring Justification for Burghmuir against SEA Factors**

Air	Biodiversity	Climatic Factors	Cultural Heritage	Landscape & Townscape	Material Assets	Population and Health	Soil	Water
<p>1.Avoid AQMAs: The site is not located within an Air Quality Management Area. The delivery of the motorway slips will provide the solution to the worsening of the air quality in the town centre.</p> <p>2.Good proximity to jobs / services: All new homes will be within reasonable walking distance of jobs at Oracle, existing amenities including the Primary School, local shops and town centre as well as the new facilities within the proposal.</p> <p>3.Good access to existing or proposed public transport: All new homes will be within easy walking distance (400m) of existing bus services located on Blackness Road. It is agreed with the Council that the town bus service will be introduced into the proposal with Wallace Land providing financial support for this extension.</p>	<p>4.Avoid adverse affect on designated international nature conservation sites: Development of this site will not affect any of these designations.</p> <p>5.Avoid significant effect on designated national/ regional / local biodiversity sites &amp; ancient woodland: There are not designations on or adjacent to the site. Development of this site will not affect any of these designations. The proposal will enhance local biodiversity.</p> <p>6.Avoid adverse direct impact on species / habitats or makes positive contribution to emerging green network: The proposed SUDS and open space strategy will improve and enhance the biodiversity of the site. The proposal links into the existing greenspace network to the west of the site. Garden areas will also enhance biodiversity within the site.</p>	<p>7.Occupy a relatively efficient location in terms of energy consumption: The site is located adjacent to existing bus services on Blackness Road and the proposed extension of the town bus service. It is within reasonable walking distance of local services and amenities in accord with PAN 75. Overall, the proposal will reduce the need for car journeys.</p> <p>8.Occupy a location at risk of increased flooding or instability due to climate change. The Flood Risk Assessment and SEPA flood risk map indicates that the site is not located in an area at risk of fluvial flooding. SUDS measures will address minor areas of pluvial flooding. These will take climate change impacts into account.</p>	<p>9.Avoid adverse effects on listed buildings: The proposal will not adversely impact the setting of the C listed farmstead.</p> <p>10.Avoid adverse impacts on Scheduled Ancient Monuments: There are no Scheduled Monuments within or close to the site.</p> <p>11.Avoid adverse impact on locally important archaeological sites: There are no significant adverse impacts.</p> <p>12.Avoid adverse effects on Gardens and Designed Landscapes: There are no Gardens or Designed Landscapes within the vicinity of the site.</p> <p>13.Avoid adverse effects on Conservation Areas &amp; or other areas of architectural historic or townscape interest. The site is not located within a Conservation Area.</p>	<p>14.Avoid AGLVs / Areas of Special Landscape Control / Areas of Special Control: The site is not located within an AGLV. Development of the site will not impact on any landscape designated area.</p> <p>15.Avoid conspicuous locations that require extensive landscape / structural planting. The site is well contained by existing landscape and development to the west and motorway to the north. It is not a conspicuous location. Further landscape screening has been added to the southern boundary.</p> <p>16.Avoid loss of / adverse effects on public open space/ improve open space provision (quantity / quality): The proposal includes public open space to meet Council requirements. It extends and improves the existing path network, making the wider greenspace network publicly available.</p>	<p>17.Avoid loss of land important to avoidance of coalescence / preservation of settlement identity: The proposal connects to Linlithgow by path, bus, the provision of facilities for the wider community within the site, and through integration in terms of settlement and local character. The updated proposal has taken into account feedback from the appeal decision. The greenspace framework proposed maintains the settlement's identity and safeguards the landscape character of Blackness Road. The proposal does not cause coalescence.</p> <p>18.Safeguard mineral resources from sterilisation: The site is not within an Area of Search for opencasting as currently identified in the WLLP.</p> <p>19.Minimise use of Greenfield Land: The site is currently used for agriculture and is greenfield land. The design of the proposal minimises its loss.</p>	<p>20.Avoid co-location of sensitive development with industrial facilities / economic allocations: The economic development allocation to the north (reference E-LI 3) is mutually compatible with the proposed land uses adjacent.</p> <p>Economic development on this existing allocated site will not adversely affect the amenity of adjacent residential development.</p> <p>Access and drainage for the Oracle Expansion Land (reference E-LI 3) will be provided through the Burghmuir site. This will provide financial savings and increase the effectiveness of this allocation.</p>	<p>21.Avoid loss of prime quality agricultural land and peatland: The site is located on prime agricultural land as confirmed in the James Hutton Institute (JHI) Land Capability for Agriculture Mapping.</p> <p>JHI soil mapping indicates that the site is not located in an area of peatland.</p> <p>All greenfield allocations in Linlithgow are located on prime quality agricultural land. The design of the proposal will minimise the loss of prime quality land.</p>	<p>22.Maintain status of baseline water bodies: SUDS 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, including the Linlithgow Lech SSSI.</p> <p>23.Minimise flood risk (on site or elsewhere): The SEPA flood risk map indicates that the site is not located in an area at risk of fluvial flooding.</p> <p>SUDS measures will address small pockets of pluvial flooding. They will ensure that surface water runoff is maintained at greenfield levels.</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 Burghmuir was set out in Appendix 2 of the *Environmental Report* at MIR stage. The site reference was EOI-0103.

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 Burghmuir 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 10 criteria where this re-assessment differs from the conclusions reached in the Council's Site Assessment.

### **Air**

The proposal will deliver new motorway sliproads required by the Council. These will have a positive impact on air quality in the town centre.

The proposal has good proximity to existing facilities and new facilities will be included within the proposal. This will reduce the need to travel by car.

There proposal has good proximity to existing bus services on Blackness Road. The town bus service will be extended into the proposal.

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

### **Climatic Factors**

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 uncertain to positive.

### **Landscape & Townscape**

The site is well contained by existing landscape and development to the west and motorway to the north. The proposal includes a comprehensive green framework with additional tree planting to provide appropriate screening in views from the south, and to maintain the character of Blackness Road.

Accordingly, the Council's score is upgraded from negative to positive.

The Council's proposed allocation of the land to the north of Blackness Road (reference P-43) for economic development supports this conclusion.

### **Material Assets**

The proposal connects into Linlithgow by path, bus, and the provision of new facilities. It maintains the setting and identity of the town. It does not cause coalescence.

The site is not within an Area of Search for opencasting as currently identified in the development plan.

For these reasons, the Council's scores are upgraded from negative and neutral to positive.

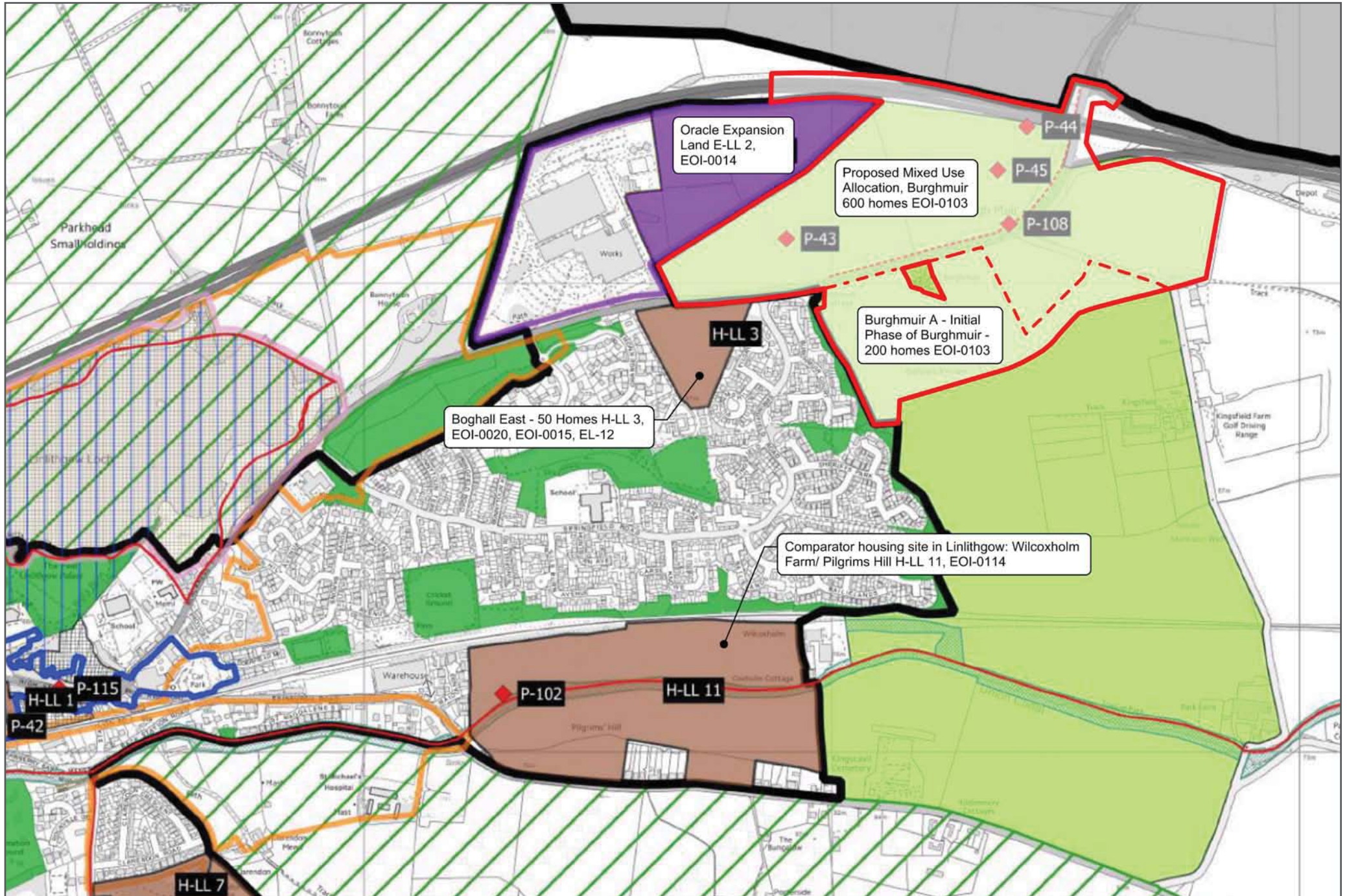
### **Water**

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. Pluvial flooding within the site will be addressed in the SUDS strategy for the proposal.

Accordingly, the Council's scores are 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 Sites to be Allocated in Proposed Plan

The Council's Site Assessment scoring for Burghmuir (EOI-0103) is presented below alongside that for another local site proposed for allocation in the Proposed Plan.

This site comparator is located to the southeast of Linlithgow. **Site H-LL 11: Wilcoxholm Farm / Pilgrims Hill** for 200 homes. This site was assessed by the Council at the MIR stage through the SEA process under reference EOI-0114.

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 Council's own assessment of Burghmuir scores higher than Wilcoxhill / Pilgrims Hill.

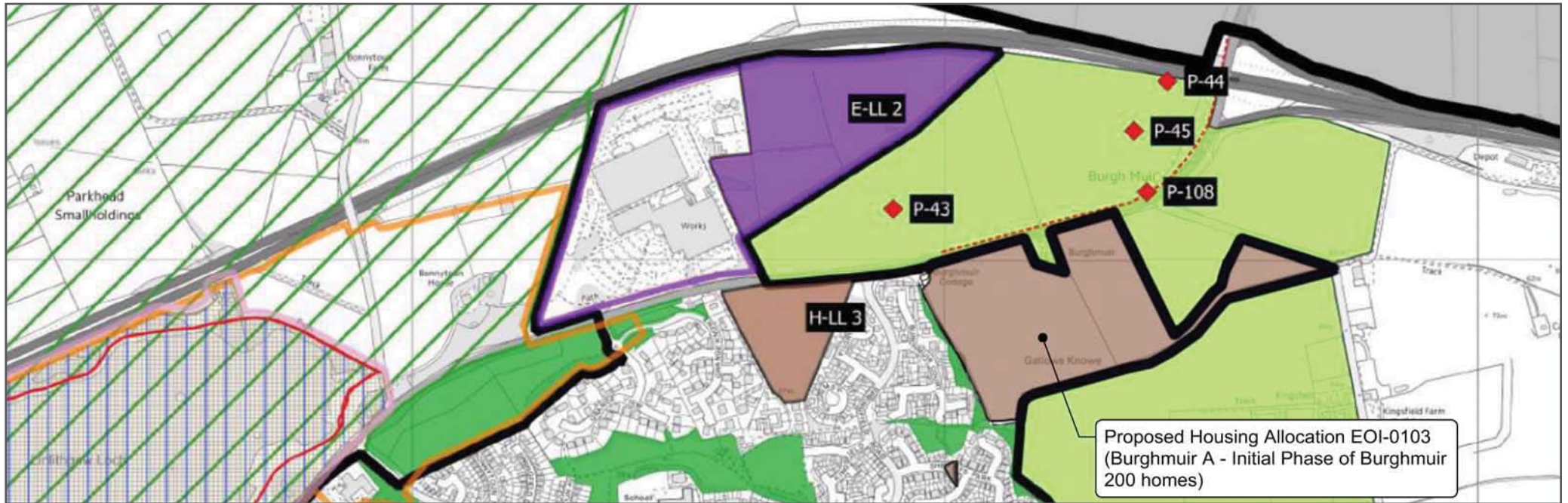
Re-Assessment of Burghmuir, taking account of mitigation measures, has less environmental impact than the allocation at Wilcoxhill / Pilgrims Hill.

The proposal at Burghmuir should be considered as a proposed allocation in the LDP in whole or part.

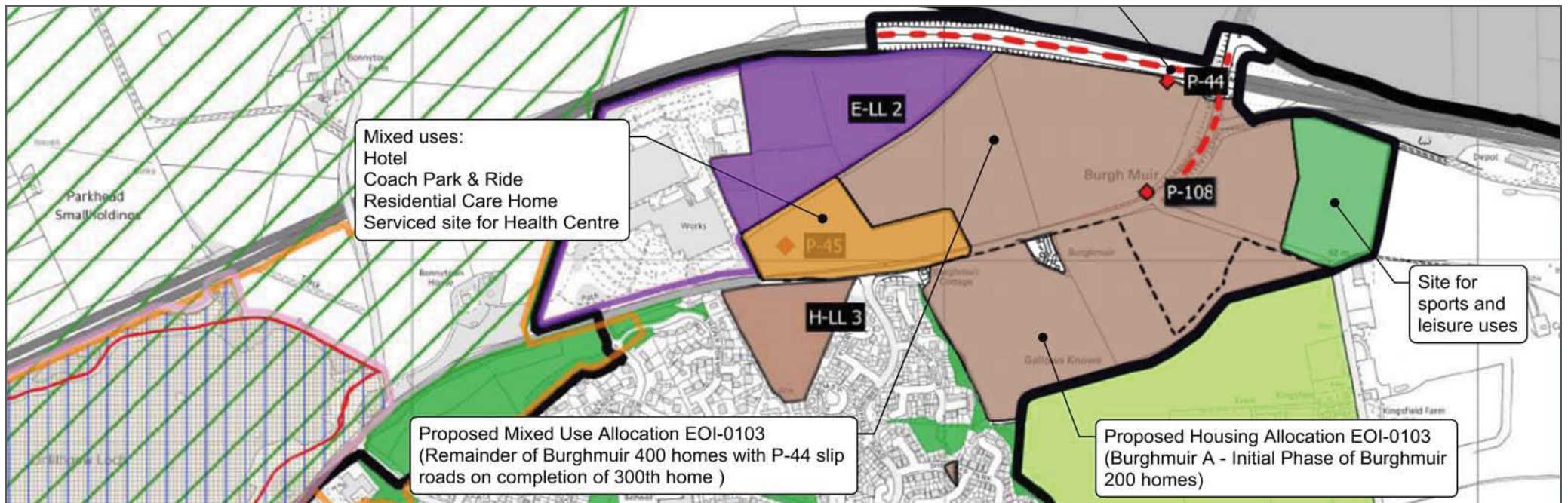
For the avoidance of doubt, development at Burghmuir will be on a phased basis with the potential for the whole site to be built over the LDP period. Delivery of the motorway slips will be after occupation of the 300th home.

Phase A can be treated as a standalone proposal for 200 homes.

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 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)?		
Wilcoxhill / Pilgrims Hill (EOI-0114) IN PART	X	X	X	✓	X	X	X	?	✓	✓	✓	✓	X	✓	X	X	/	X	✓	X	/	✓		/	
	1	1	1	4	1	1	1	2	4	4	4	4	1	4	1	4	1	3	1	4	1	3	4	55	2.4
Council Assessment: Burghmuir (EOI-0103)	X	X	X	✓	✓	✓	✓	?	✓	✓	✓	✓	✓	X	✓	X	/	X	X	X	/	?		/	
	1	1	1	4	4	4	4	2	4	4	4	4	4	4	1	4	1	3	1	1	1	3	2	62	2.7
Re-assessment: Burghmuir (EOI-0103)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	X	✓	X	✓	✓		✓	
	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	1	4	1	4	4	4	86	3.7



Additional site at Burghmuir (Initial Phase Burghmuir A - 200 homes) for allocation in LDP



20 Additional site at Burghmuir (600 homes) for allocation in whole or part in LDP - motorway slips delivered on the occupation of the 300th home

## 6. Recommendation to Council

This Supporting Statement demonstrates that development of the Burghmuir site (as appraised by the Council) has less environmental impact than Site H-LL 11: Wilcoxholm Farm/ Pilgrims Hill allocated for 200 homes in the Proposed Plan.

Re-assessment of the proposal against the SEA assessment criteria indicates that the site scores even more favourably for a number of topics 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.

The Council has also concluded that the land at Burghmuir to the north of Blackness Road is also suitable for development albeit as economic use.

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.

Burghmuir Phase A for 200 homes is immediately effective. A further phase of 400 homes would follow, delivering the motorway slips by the occupation of the 300th home.

At 60 private sales plus 20 affordable homes annually, the whole site 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 has less environmental impact than the largest greenfield site allocated in the Proposed Plan in Linlithgow.

Wallace Land has submitted Applications firstly for Planning Permission in Principle for Burghmuir and then for Burghmuir A.

This revised proposal addresses the Reporter's landscaping and other concerns in dismissing the subsequent appeal at Burghmuir A (reference PPA-400-2045).

Accordingly, Burghmuir and Burghmuir A have been subject to public consultation through the development management process. Pre-Application Consultation reports for both applications can be made available to the Council on request. This goes beyond that carried out by the Council for the LDP.

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 sets out why both these requirements as set out in Circular 6/2013 are met.

For the avoidance of doubt, development at Burghmuir will be on a phased basis with the potential for the whole site to be built out over the LDP period.

Burghmuir A can be allocated as a standalone proposal for 200 homes as required.





Revision	Status	Prepared	Checked	Date
V1	DRAFT	Phil McLean	Bob Salter	19/11/2015
V2	FINAL	Bob Salter	Stuart Salter	20/11/2015

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