



*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

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

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

Wellhead Farm, Murieston

November 2015

Supporting Statement

Delivery of Additional Sites

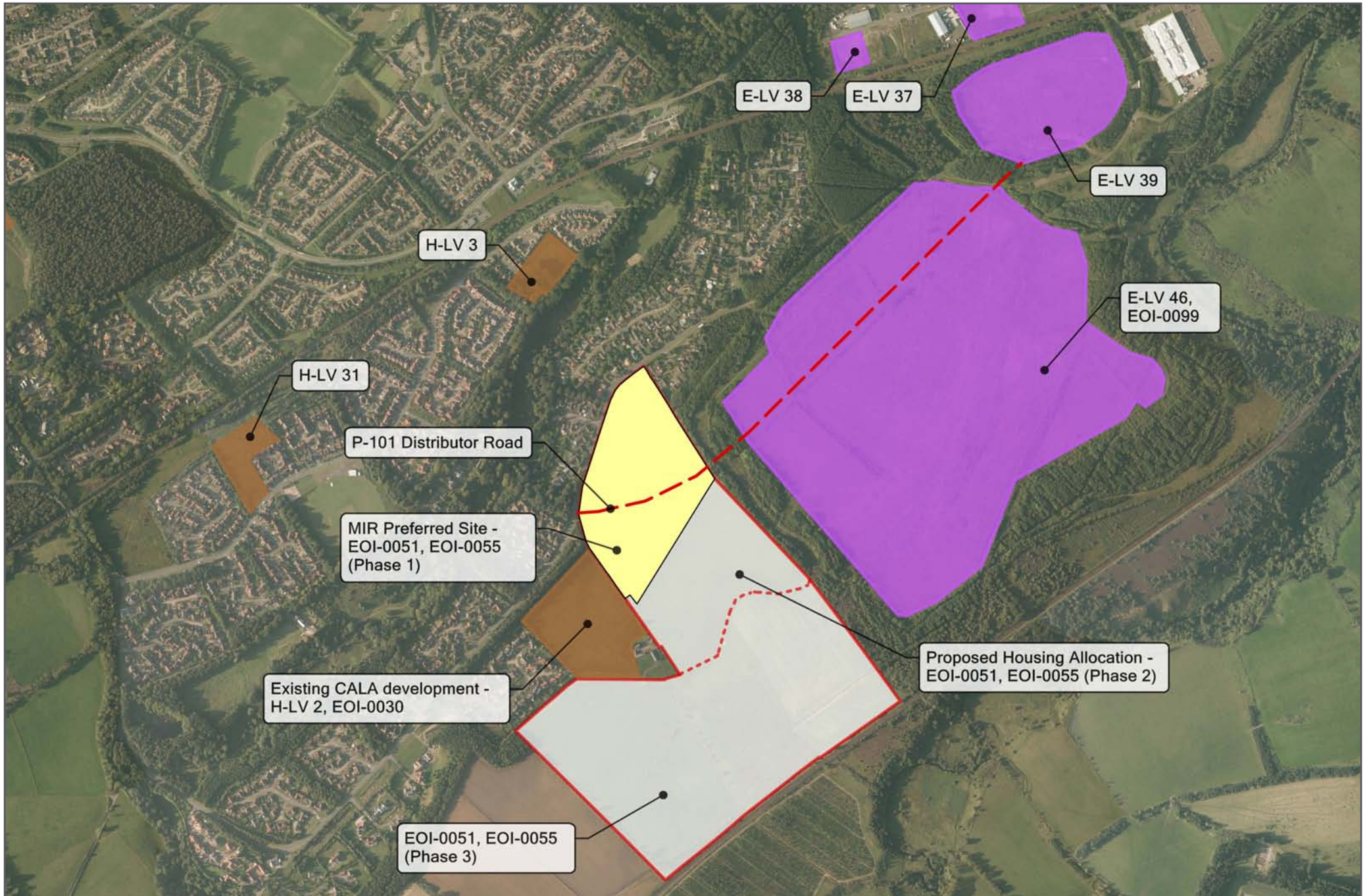




Frontage of the proposal at Wellhead Farm (EOI-0051/0055) along Murieston Road

Contents

| | |
|---|-----------|
| Introduction | 7 |
| 1. Need for Additional Housing Sites | 9 |
| 2. Updated Proposal | 11 |
| 3. Council's SEA Site Assessment | 13 |
| 4. SEA Re-Assessment for Proposal | 17 |
| 5. SEA Assessments for Comparable Sites to be Allocated in Proposed Plan | 19 |
| 6. Recommendation to Council | 21 |



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 Wellhead Farm, Murieston (EOI-0051/0055).

This proposal is for a development in three phases for a total of 680 homes plus community hub. Each phase is standalone and the site can come forward in one, two or all three phases together.

The LDP Main Issues Report (MIR) identified part of the site as Preferred for housing development (EOI-0051). The Council considered this site had capacity for 100 homes on 8.3ha site. This was part of a larger site promoted to the Council in advance of the MIR by the owners of Wellhead Farm (EOI-0055).

This MIR Preferred Site was supported by the Council's Site Assessment through the Strategic Environmental Assessment (SEA) process (SEA Environment Report Appendix 2). This confirmed that the environmental impacts of the proposal were acceptable for 18 out of 23 SEA assessment questions. An identical Assessment was also included for the remainder of the site (EOI-0055).

In response to the MIR, Wallace Land submitted representations supported by Development Framework Reports for the phases of development

at Wellhead Farm. The representation for Phase 1 supported the allocation of the MIR Preferred Site but for its 150 homes capacity. The representation for Phase 2 (assessed by the Council as EOI-0055) promoted the additional allocation of 7.4ha of land for 130 homes. The representation for Phase 3 promoted the allocation of the remaining phase for 400 homes in the latter plan period (also assessed by the Council as EOI-0055).

The Proposed Plan now excludes the MIR Preferred Site at Wellhead Farm. Instead, the whole site is proposed to form part of the *Countryside Belt* around Livingston. No justification is provided for this designation. No indication is given in the Proposed Plan or any of its supporting evidence, of the reasons for the change in position from the MIR stage.

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, 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 the Council's conclusion that the proposal at Wellhead Farm is in a sustainable location. It forms an attractive and logical extension to the south side of Murieston. The

site is within walkable distance of existing amenities and has good public transport accessibility. The proposal will meet local housing need and demand, 170 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 Phases 1 and 2. It would be built within 5 years, initially at 50 completions per annum. In year 3, this would rise to around 80 completions per annum. This includes affordable housing. Phase 3 would follow, being developed within the 10 year period of the LDP from its date of adoption.

As confirmed by the Council in its SEA Site Assessment, the environmental impacts of the proposal are acceptable.

This Supporting Statement provides an updated SEA Site Assessment, taking into account additional site appraisals. This demonstrates that the phased development of this site compares favourably in SEA terms with other local sites that are proposed for allocation.

Accordingly, this Supporting Statement demonstrates that this site can be allocated for development of up to 680 homes. This can be one or two phases only, or all three phases. This will help ensure the LDP meets its housing land requirement.

| | 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 |
| <i>equals</i> 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. Updated Proposal

The proposal forms an attractive and logical extension to the south side of Murieston. It is shown on the plan opposite.

This proposal has been updated to take account of public consultation, held in September 2015.

Phases 1 and 2 are promoted for residential development with Phase 3 incorporating a community hub. Earlier phases are capable of coming forward independently. The facilities in the community hub would be agreed with the Council. This could include a site for a new Primary School, should this be necessary to support later phases of development.

The proposal will meet local housing need and demand within Livingston. 25% of this development (around 170 homes) will be affordable housing.

The site will be accessed by vehicles from two access points on Murieston Road. Pedestrian access will also be provided to Murieston Road. A new footpath will be provided along Murieston Road on the frontage to the proposal.

A new distributor road is identified as LDP P-101 in the proposed LDP. The rationale and justification for this is not clear. If the road is required, it can be provided through the northern half of the Wellhouse Farm site. This will link through to the economic development site at Linhouse. It could help to

alleviate traffic flows on Murieston Road and provide further vehicular connections around the south of Livingston to the wider area.

There is potential to provide pedestrian and cycle connections to the wider countryside, as well as links to the Green Network within Livingston.

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

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

New open space will connect into the existing greenspace network to the east of the site. Public open space is located to the north of new distributor road creating interest and character along this route.

Open space adjacent to the minor watercourse creates an attractive and appropriate link to the countryside and green network. The provision of

open space will be in accordance with the Council's requirements.

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

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

This site is immediately effective.

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, Phases 1 and 2 would be completed within 4 years. The whole site would be built during the 10 year LDP period.

Because the site is immediately effective, Wallace Land submitted a Proposal of Application Notice (PAN) in July 2015.

An Application for Planning Permission in Principle for Phases 1 and 2 is expected to be lodged in December 2015.

| 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: Wellhead Farm (EOI-0051) | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | / | X | X | X | ? | ✓ | Adjacent Linhouse major development site | |
| Wellhead Farm (EOI-0055) | See site 51 | | | | | | | | | | | | | | | | | | | | | | | |

3. Council's SEA Site Assessment

The whole of the Wellhead Farm site was assessed by the Council as part of the Strategic Environmental Assessment (SEA) process at Main Issues Report stage (reference EOI-0055). The SEA Site Assessment and Site Appraisal were set out in the *SEA Environment Report Appendix 2*.

The Council's SEA Site Assessment concluded that the environmental impacts of the proposal were acceptable. The Council included part of the Wellhead Farm site as a Preferred Site for housing development (reference EOI-0051). The Site Assessments for EOI-0051 and EOI-0055 are identical.

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), 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 two pages.

The Council's Site Assessment confirmed that the environmental impacts of the proposal were acceptable for 18 out of 23 SEA assessment questions, including all 16 questions for the following 5 SEA topics:

- Air
- Biodiversity
- Climatic Factors
- Cultural Heritage
- Landscape & Townscape

Four out of the nine SEA topics for the proposal were not scored positive. These are detailed below, with observations.

Material Assets

Under the *Material Assets* SEA topic, the site scored positively in terms of, does it ... *Avoid loss of land important to avoidance of coalescence/ preservation of settlement identity?*

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. The design process for Wellhead Farm will minimise the take-up of greenfield land.

Population & Health

The site scored negative in terms of, does it ... *Avoid co-location of sensitive development with industrial facilities/ economic allocations?* The Council notes ... *Adjacent Linhouse major development site*. This observation fails to take account of the presence of the 100m wide *Countryside Belt* between the two sites. This will act as a buffer to protect residential amenity.

Soil

The site scored negative in terms of, does it ... *Avoid loss of prime quality agricultural land and peatland?* In fact, less than 10% of the proposal is mapped as prime quality agricultural land (Class 3.1); the remainder is Class 4.2 (incorrectly noted as Class 4.1 in the Council's Site Appraisal).

This small area of prime land within the site is proposed to be retained as open space.

| | | |
|---|---|----------------------------------|
| Proposed use - Site at Wellhead Farm, Livingston Mixed used, but primarily residential development (housing figures would be determined through a masterplan process) WLLP reference (if known/applicable) – N/A WLLDP reference: EOI-0055 | | Date – 06/10/11 |
| CONDITION & SETTING | General comments | |
| Present Use Brownfield/greenfield/ruin/mixed | Greenfield site outwith settlement envelope of Livingston in the adopted WLLP that is covered by the Livingston Countryside Belt designation and also part of the development area for the employment site at Linhouse, ELv54. This submission is the same as EOI site 0051, except it includes the farm buildings at Wellhead Farm. | |
| Slope and Shape | Site slopes from north to south towards the Edinburgh to Glasgow Central railway line, but could easily be developed. | |
| Altitude and Exposure | Although the site is not significantly elevated and it will be exposed to the prevailing wind. | |
| Un-neighbourly/non conforming uses | The Edinburgh – Glasgow Central Railway line traverses the southern boundary of the site and could have implications in terms of railway noise to any residential properties, unless there is an appropriate stand off as confirmed with Environmental Health and in accordance with Network Rail guidance, government guidance on noise in PAN56 and the councils approved Planning and Noise SPG. | |
| Relationship to Townscape | Although the site would be read against Murieston Road to the north and the residential properties beyond this and to some extent against the allocated site HLv59, the development of this site would represent a significant and negative incursion into the countryside beyond the existing well defined and consistent settlement envelope. | |
| Landscape Fit – Intervisibility | Given that the site will represent a significant largely negative incursion into the landscape beyond a well defined settlement boundary at the moment. It will be intervisible only partly therefore with the settlement of Livingston. The countryside belt provides an obvious buffer at the moment between Livingston and the railway line to the south and this development would significantly breach that buffer. | |
| Landscape Fit – Skyline | The site elevates from the north to the south, but is not significant, however, there would be a breach of the skyline when the site is viewed from the north to the south. | |
| Defined Boundary | To the north the site has a defined boundary of existing residential properties at Wellview Land and also Wellhead Farm and Murieston Road beyond this. To the east is a woodland belt and informal footpath that provides the softened edge to the employment allocation ELv54. To the south is the Edinburgh – Glasgow Central Railway line and to the west is a narrow shelterbelt of trees the neighbouring arable field. | |
| On Site Constraints | No obvious on site constraints apart from some overhead telephone cables on site. Site also contains a small abandoned hose on the north western side that has been subject to an application in 2011 ref 0214/FUL/11 that was refused and although not listed has some architectural merit. | |
| Ground Conditions/ Natural Features | No obvious ground condition features. However, given history in locality of deposition of ash under Midlothian County Council days, consultation is required with the contaminated land officer. Also, the Coal Authority views require to be sought on the proposals. | |
| Trees | Woodland belt on the western boundary and more significant woodland on the eastern side of the site. Only minor woodland exists within the site, the loss of which would not be a significant concern. Any new development would require significant woodland planting to provide adequate buffers to the railway line and existing properties to replace any trees lost and provide a softened edge to the settlement of this allocation is to be supported. | |

| CONDITION & SETTING | General comments |
|--|---|
| Protected Species (biodiversity) | GGP does not indicate any notable habitats on the site or anything from the 1993 Phase 1 Habitat Survey on the site. To the east of the site is a broadleaved woodland and scrub buffer to the ELv54 allocation and also small areas beyond the site boundaries in the north and west of the site. Also, part of the eastern area of woodland outwith the site contains Grassland and Marsh as part of the Linhouse Water. The site may however require to be subject to analysis by TWIC and SNH as appropriate as to whether a full biodiversity assessment would be required for the site. Given the nature of the site as an arable field, it is thought that any EPS on the presence of any EPS on site will be unlikely. SNH have been consulted with regard to potential impact on protected species from developing the site. |
| Green Network (CSGN) | No significant impact – awaiting GIS/GGP overlay information from CAIcorn on the CSGN. |
| Access/Parking/Roads | It is unclear what the access to the site will be, however, it will be likely from Murieston Road. An existing access track runs north to south to Murieston Road that may well prove to be a good access point. This will require the clarification of Transportation. It is noted that allocated site HLv59 immediately west of this site requires a 40m junction spacing. |
| Watercourse within vicinity (potential flood risk) | There are some minor watercourses within the vicinity of the site and given site HLv59 to the west requires a FRA, it is likely that this site will also require a FRA. This will require to be confirmed by the councils Flood Prevention Officer. The site does not show up on the SEPA Fluvial Flood Risk Maps however. |
| Other | None |
| Conclusion/Summary: Site potential and impact on the community and/or settlement. | <p>The development of this whole site would represent a significant incursion into an existing area of designated protected countryside that provides a clearly defined rural backdrop to the southern end of Livingston beyond the extent of existing development south of Murieston Road and the Edinburgh - Glasgow Central Railway Line. There may however be scope for part of the site to be allocated south of Murieston Road, provided its depth does not go beyond that of the existing development pattern south of the road.</p> <p>In terms of MaCaulay Land Capability, the site is almost wholly 4.1, i.e. land capable of producing a narrow range of crops. Part of of the site to the east is covered by 3.1, i.e. land capable of producing a moderate range of crops.</p> |

Council's Site Appraisal for Wellhead Farm (EOI-051/055) continued

Water

The site scored uncertain in terms of, does it ... *Maintain status of baseline water bodies?* A majority of sites scored uncertain or neutral. This assessment does not take into account that all proposals need to include a SUDS strategy. This would always ensure no degradation of the water quality and maintain surface water runoff at greenfield levels.

Conclusion

The observations on the Council's Site Assessment in general and specifically for the Wellhead Farm site confirm that the Council's approach does not fully take into account the 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 other greenfield sites within the *Countryside Belt* of Livingston which the Council has allocated in the Proposed Plan. This is explained in Section 5.

SEA Site assessment – Wellhead 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-0055 | Wellhead Farm | Wallace Land | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | / | X | X | X | ? | ✓ | WLC Assessment |
| EOI-0055 | Wellhead Farm | Wallace Land | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | / | X | ✓ | ✓ | ✓ | ✓ | Geddes Consulting Assessment |

Scoring Justification for Wellhead Farm against SEA Factors

| Air | Biodiversity | Climatic Factors | Cultural Heritage | Landscape & Townscape | Material Assets | Population and Health | Soil | Water |
|--|--|---|--|---|--|--|--|---|
| <p>1. <i>Avoid AQMAs:</i> The site is not located within an Air Quality Management Area</p> <p>2. <i>Good proximity to jobs / services:</i> All new homes will be within reasonable walking distance of a number of amenities including a primary school, food store and other local shops.</p> <p>3. <i>Good access to existing or proposed public transport:</i> Some new homes will be within easy walking distance (400m) of existing bus stops located Murieston Road.</p> <p>Some new homes will also be within reasonable walking distance (1600m) of Livingston South train station.</p> <p>All homes can be within 400m of a bus service if buses are routed to the proposed community hub.</p> | <p>4. <i>Avoid adverse affect on designated international nature conservation sites:</i> There is a SSSI located south of the railway line. Development of the site will not affect this designation.</p> <p>5. <i>Avoid significant effect on designated national/ regional / local biodiversity sites & ancient woodland:</i> There is an area of Ancient Woodland to the east of the site and south of the railway line. The development of the site will have no adverse impact.</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. It will link into the adjacent greenspace network. Garden areas will also enhance biodiversity within the site.</p> | <p>7. <i>Occupy a relatively efficient location in terms of energy consumption:</i> The site is located close to existing bus services (with the potential to introduce a service to the new community hub). It is within reasonable walking distance of Livingston South train station.</p> <p>8. <i>Occupy a location at risk of increased flooding or instability due to climate change:</i> The SEPA flood risk map indicates that the southern part of the site may be subject to pluvial flooding. This would be addressed in the drainage strategy for the site.</p> | <p>9. <i>Avoid adverse effects on listed buildings:</i> Murieston House and bridge which are Category B listed are located 450m north west of the site. Development of this site will not adversely impact the setting of these Listed Buildings.</p> <p>10. <i>Avoid adverse impacts on Scheduled Ancient Monuments:</i> There are no SAMs within or close to the site.</p> <p>11. <i>Avoid adverse impact on locally important archaeological sites:</i> There are no CANMORE or WoSAS listings on the site. An archaeological evaluation was carried out for site HLv59 to the west of the site, which confirmed no archaeological interest.</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 site is not located within an AGLV. An area of Special Landscape Control is located north west of the site along the Murieston Water. Development of the site will not impact on this designation.</p> <p>15. <i>Avoid conspicuous locations that require extensive landscape / structural planting:</i> The site is well contained by existing trees to the east and residential development to the north and west. Further edge planting is proposed.</p> <p>16. <i>Avoid loss of / adverse effects on public open space/ improve open space provision (quantity / quality):</i> The proposal includes public open space, increasing the quantity of publicly accessible open space in the area.</p> | <p>17. <i>Avoid loss of land important to avoidance of coalescence / preservation of settlement identity:</i> The site is located within the Countryside Belt.</p> <p>There are existing residential areas to the west and north of the site. Existing woodland lies to the east of the site. To the south of the site is open farmland. The site is contained by the railway line to the south.</p> <p>Development of this site will not adversely impact of the identity of the settlement.</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 WLLP.</p> <p>19. <i>Minimise use of Greenfield Land:</i> The site is currently used for agriculture and is greenfield land. The design process will minimise the take-up of greenfield land.</p> | <p>20. <i>Avoid co-location of sensitive development with industrial facilities / economic allocations:</i> Wallace Land has prepared a Development Framework for this site.</p> <p>This Development Framework illustrates the substantial landscape buffer (100m) between the areas allocated for housing and economic development.</p> <p>The economic development will not adversely affect the amenity of the site's use as residential development.</p> | <p>21. <i>Avoid loss of prime quality agricultural land and peatland:</i> The majority of the site is not located on prime agricultural land as confirmed in the Macaulay Land Capability for Agriculture Mapping. A very small area of the site is Class 3.</p> <p>British Geological Mapping indicates that the site is not located in an area of peatland. The proposal will therefore have no impact on the loss of agricultural land or peatland.</p> | <p>22. <i>Maintain status of baseline water bodies:</i> 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.</p> <p>23. <i>Minimise flood risk (on site or elsewhere):</i> The SEPA flood risk map indicates that the site is not located in an area at risk of fluvial flooding, although a small part of the site may be subject to pluvial flooding.</p> <p>The SUDS strategy for the site will ensure that surface water runoff is maintained at greenfield levels.</p> |

4. SEA Re-Assessment for Proposal

The Council's Site Assessment for Wellhead Farm was set out in Appendix 2 of the *Environmental Report* at MIR stage. This assessment covered the MIR Preferred Site and further land to the south, including all Phases of the Wellhead Farm proposal. The site reference for the wider site was EOI-0055.

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

A re-assessment of the environmental impacts of the Wellhead 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 three criteria where this re-assessment differs from the conclusions reached in the Council's Site Assessment.

Population and Health

A proposed economic allocation (ELv46) is located to the east of the site. There is an existing *Countryside Belt* which will act as a buffer (100m wide) between the two land uses. This buffer will provide adequate distance to protect the amenity of homes on the site.

With regard to the impact of noise from the railway line to the south, a Noise Assessment will be carried out. Mitigation measures such as acoustic screening will be part of the design solutions to deliver the required level of residential amenity.

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

Soil

James Hutton Institute (JHI) Land Capability for Agriculture Mapping indicates that the majority of the site is class 4.2 and a very small area is class 3.1 (less than 10%). The majority of the site is therefore not classed as prime quality agricultural land. The proposal will largely retain the area of prime quality land as open space.

JHI Soil Mapping indicates that the site is not located in an area of peatland.

Accordingly, the proposal will not impact on the loss of prime quality agricultural land or peatland.

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.

Accordingly, the Council's score has been upgraded from uncertain to positive.

Conclusion

The Council concludes that this site is in a sustainable location.

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

It is noted that the Council has raised some concerns on the potential landscape and visual impacts in its Site Appraisal.

Wallace Land has commissioned a *Landscape and Visual Appraisal* for Phases 1 and 2. This concludes that the site is well screened. This conclusion would equally apply to Phase 3.

5. SEA Assessments for Comparable Sites to be Allocated in Proposed Plan

The Council's Site Assessment scoring for Wellhead Farm (EOI-0055) is presented below alongside that for two other local sites proposed for allocation in the Proposed Plan.

Both of these comparators are located within the *Countryside Belt*, see plan opposite. These are:
Site H-LW 1: Gavieside, by Polbeth. This was assessed by the Council under reference EOI-15/41.

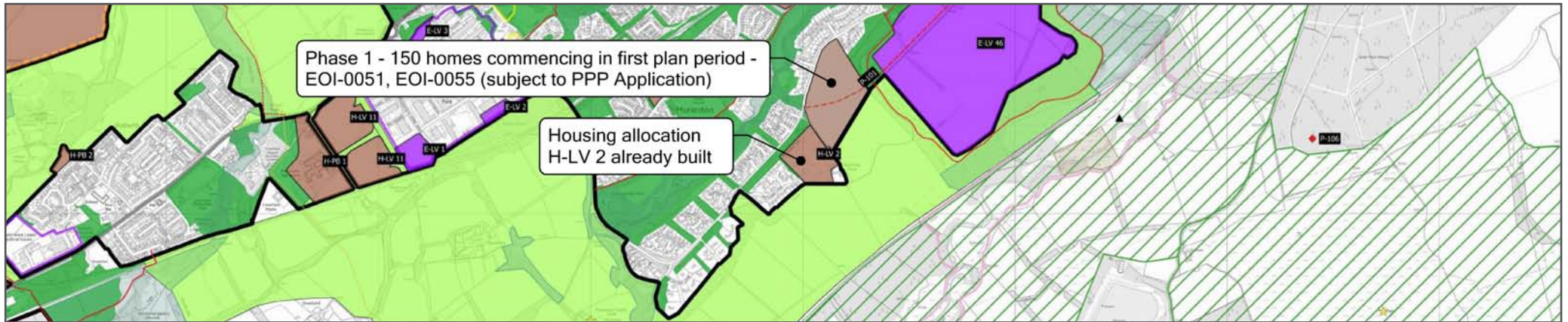
Sites H-WC 2, H-WC 3, H-WC 4: Mossend Core Development Area (known as Phase 1 Sites A and B and Remainder). This area was assessed under reference EOI-CDA-MO.

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

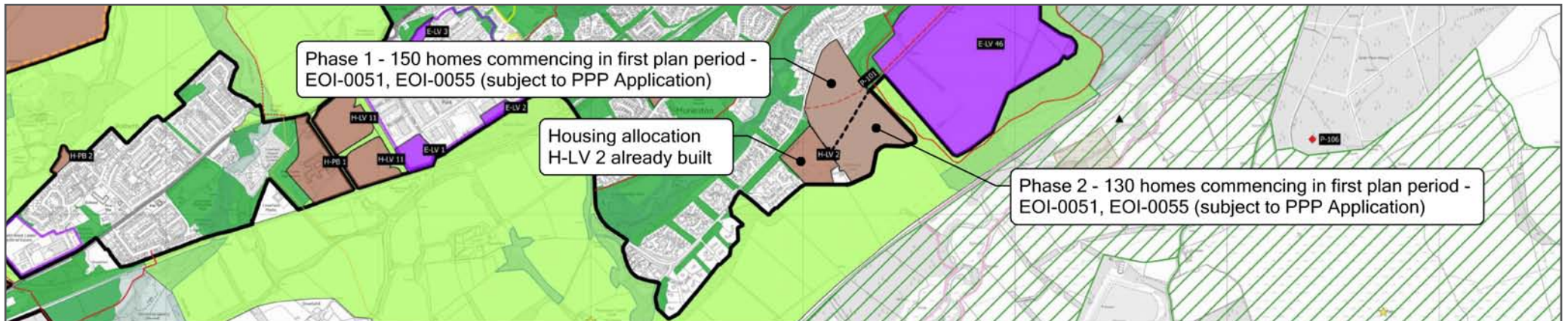
The table demonstrates that the Council's Assessment of the Wellhead Farm site scores equally with the Mossend Core Development Area. The Council's Assessment for Wellhead Farm is also higher than the proposed allocation at Gavieside.

The Re-Assessment confirms that the Wellhead Farm site scores more favourably than proposed allocations.

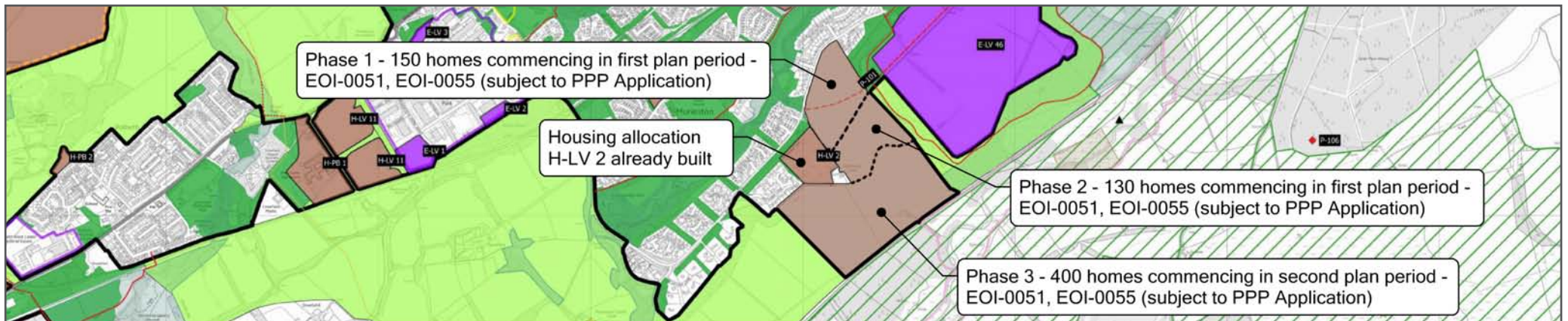
| Assessment Areas | Air | | | Biodiversity | | | Climatic Factors | | Cultural Heritage | | | | | Landscape & Townscape | | | Material Assets | | | Population Health | Soil | Water | | Overall Assessment | Average Score |
|---|--|--|--|--|---|---|---|---|---|---|--|---|---|---|---|---|--|--|------------------------------------|--|---|---|---|--------------------|---------------|
| | 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 AQMAs/ 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)? | | |
| CDA: Mossend (A+B) (EOI-CDA-MO) | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | X | ✓ | ✓ | / | X | ✓ | X | ? | ✓ | | | ✓ |
| Gavieside, by Polbeth (EOI-15/41) | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 1 | 4 | 4 | 3 | 1 | 4 | 1 | 2 | 4 | | 80 | 3.5 |
| Re-assessment: Wellhead Farm (EOI-0055) | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | X | / | ✓ | / | X | ✓ | X | ? | ✓ | | | ✓ |
| Council Assessment: Wellhead Farm EOI 0055 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 3 | 1 | 1 | 1 | 2 | 4 | | 80 | 3.5 |
| Re-assessment: Wellhead Farm (EOI-0055) | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 3 | 1 | 4 | 4 | 4 | 4 | | 88 | 3.8 |



Additional site at Wellhead Farm - Phase 1 (150 homes) for allocation in LDP



Additional site at Wellhead Farm - Phase 1 and 2 (280 homes) for allocation in LDP



6. Recommendation to Council

The Council's SEA Site Assessment confirms that the environmental impacts of the Wellhead Farm proposal are acceptable. Based on this Assessment, the West Lothian LDP Main Issues Report (MIR) identified part of the Wellhead Farm site as a Preferred Site for housing development (EOI-0051).

This has not been carried forward into the Proposed Plan although no reasons are given. The Proposed Plan fails to allocate sufficient housing land.

This Supporting Statement demonstrates that phased development of the Wellhead Farm site (EOI-0051/EOI-0055) compares favourably in SEA terms with other local sites recommended for allocation in the Proposed Plan.

The site has equivalent or less environmental impact than other local sites proposed for allocation, according to the Council's own Site Assessments.

Further 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.

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 60 private sales per annum, plus 20 affordable homes, Phases 1 and 2 would be completed within 4 years. 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.

Because the site is immediately effective, Wallace Land submitted a Proposal of Application Notice (PAN) in July 2015. An Application for Planning

Permission in Principle for Phases 1 and 2 is expected to be lodged in December 2015.

This Application will provide evidence of public consultation as part of the Pre-Application Consultation Report. This can be made available to the Council in support of the allocation of this site to meet its housing shortfall.

Accordingly, the site of Phases 1 and 2 have 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 meets both requirements as set out in Circular 6/2013.

Wallace Land recommends that the site can be allocated as Phase 1 for 150 homes, Phase 1 and Phase 2 for 280 homes, or as all three Phases for up to 680 homes plus community hub.

| Revision | Status | Prepared | Checked | Date |
|----------|--------|-------------|---------------|------------|
| V1 | DRAFT | Bob Salter | Phil McLean | 17/11/2015 |
| V2 | FINAL | Phil McLean | Stuart Salter | 20/11/2015 |

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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*