



*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*



Cala Management Ltd.

Site reference – MIRQ0134 - Bughtknowes Farm, Bathgate

Representation to Proposed West Lothian Local Development Plan – November 2015

On behalf of **CALA Management Ltd.**, this is an **objection** to the Proposed Plan.

We are proposing the addition of Bughtknowes Farm as site **H-BA-31** and **P-11** and therefore object to **Policy HOU1 and Appendix 2** in so much that the site at Bughtknowes should be included as;

- ***H-BA-31 – Land at Bughtknowes Farm and adjacent to Torphichen Road, Bathgate – capacity to deliver up to 200 homes within the plan period including access improvements on Drumcross Road and potential to provide much needed publically available allotments.***
- ***P-11 – creation of 10 hectare of formal and informal public open space, providing parking and pedestrian, equestrian and cycle access to the Bathgate Hills and Petershill Nature Reserve.***

This representation is to be read in conjunction with our submission to the Main Issues Report in October 2014 (and attached to this submission for completeness).

In making this representation we are keen to highlight where development at Bughtknowes would accord with other policies within the Proposed Plan;

HOU1 – add the Bughtknowes Farm site (MIRQ0134) to Appendix 2. We have concerns over the over-reliance on sites to the south-west of Bathgate at Wester Inch, Whitburn Road and Standhill Farm.

This area of Bathgate is accounting for over 700 new homes within the plan period concentrating development activity in a localised geographic area, risking the development of a series of large similar looking neighbourhoods dominated by standard product.

The area to the south west of Bathgate encourages commuter living, with residents working, shopping and playing away from Bathgate impacting on community and character whilst not supporting local businesses in the town centre.

Given this concentration of development, it is unlikely that the necessary number of new homes can be delivered during the plan period. The developers will respond to market demand and it is impossible that the requisite number of homes could be sold in a 'single' location over the defined plan period.

It would be far more effective and credible for West Lothian Council to allocate additional sites in a variety of locations that would enable Bathgate to provide a genuine choice of locations, house types and different tenures options. Bughtknowes would help achieve this mix.

Bughtknowes location would create a high-quality neighbourhood, physically and visually linked with neighbouring land uses, and far more likely to sell homes to residents who spend time and money in the town utilising facilities and services and not exacerbating expenditure leakage away from Bathgate.



Cala Management Ltd.

Site reference – MIRQ0134 - Bughtknowes Farm, Bathgate

Representation to Proposed West Lothian Local Development Plan – November 2015

HOU2 – as per our PAN2/2010 assessment, the site is effective. This assessment is included in the attached letter lodged with our MIR submission.

HOU3 – although outwith the existing settlement boundary, the site could be developed in accordance with the criteria laid out in HOU3, further emphasising the sites' credibility as an appropriate housing site.

HOU5 - both CALA Management and the landowner are happy to comply with West Lothian Council policies with regards to the provision of an appropriate level of affordable housing.

ENV1 – the site sits comfortably in a rising and visually enclosed landscape. It constitutes less than 1% of the existing AGLV/emerging SLA and in providing formalised open space and improving access to the Bathgate Hills and Petershill SSSI beyond, would help preserve and protect more sensitive areas, whilst improving public access to the countryside.

ENV15 – the landowner has made it clear that either within the Bughtknowes site boundary (as per MIRQ0134) or on other land under his ownership, he is willing to provide an appropriate site for the provision of allotments/community growing spaces.

ENV18 & ENV19 – the allocation of Bughtknowes for development will improve and formalise access to Petershill SSSI. It is anticipated and within control of the landowner/developer, that improvements will be made to Drumcross Road which again will improve the ease and safety of access to the SSSI and beyond. Appropriate planning gain could see improved access/parking at Petershill alongside direct funding for maintenance and improvements to the former reservoir site.

ENV21 – the Proposed Plan seeks to protect existing areas of formal and informal open space. The plan does not however encourage or require the provision of new areas of open space. The proposals at Bughtknowes would create a well-designed, high-quality, accessible area of open space incorporating formal picnic/activity/play areas alongside untouched though managed areas of informal open space eventually giving access to the Bathgate Hills beyond. This could be a critical amenity for the people of Bathgate linking into the facilities at the Balbardie Park of Peace.

Main Issues Report

In response to the MIR submission, West Lothian published their response. The Council counters that it has allocated sufficient land to meet housing land demand so no additional sites are required.

We would respond by saying that the site at Bughtknowes seeks to provide far more than simply new homes to the Bathgate area, promoting increased and improved access to the countryside and providing much-needed formal and informal open space. This in itself offers compelling reasons to seriously consider the allocation of land to the north-east of Bathgate given the benefits from such a genuinely mixed-use development proposal.



Cala Management Ltd.

Site reference – MIRQ0134 - Bughtknowes Farm, Bathgate

Representation to Proposed West Lothian Local Development Plan – November 2015

Moreover, and as stated above, we have legitimate concerns over the delivery of the housing land allocations, within the plan period where they are concentrated to the south-west of the town. This limits choice and will only be built out when the market can absorb new units at specific locations. In addition, the allocations at Wester Inch, Whitburn Road and Standhill will encourage commuter living, and not contributing to the character and community of Bathgate.

West Lothian Council's response to our MIR submission also states that the development at Bughtknowes **would constitute an intrusive physical expansion of Bathgate that would be visually and environmentally intrusive**. We would strongly refute this statement and again would refer you to our earlier submission (October 2014 and attached). The site is well enclosed by a rising landform and existing trees and woodland. Bughtknowes covers less than 1% of the AGLV/SLA and is adjacent at several points to existing housing development.

The settlement boundary is drawn too tightly around the settlement at this location and a more appropriate boundary could be drawn further to the north-east where the landscape features provide justification for a more defensible and logical settlement edge.

It is considered that, subject to careful masterplanning, the release of land for development would have a negligible impact on the integrity of the wider AGLV designation, a point emphasised by the creation of a 10 hectare public park which could be managed to enhance this area of the AGLV. Indeed, in assessing the site during the previous Local Plan Inquiry, the Reporter agreed that *"the site cannot be described as outstanding"* (Paragraph 5.29).

Site Characteristics

MIRQ0134 covers approximately 24 hectares and can be split roughly into three parts. The northern part of the site measuring 6 hectares and intended for mainly residential development, the central area, measuring 10 hectares which is intended to be dedicated to providing high quality open space, enabling better access to the countryside (including Petershill Nature Reserve to the east) and an 8 hectare area around the existing Bughtknowes Farm in the southern part of the site (Main Issues Ref: EOI-0080), also intended to be developed mainly for housing.

Existing Land Uses

The Bughtknowes Farm land is currently used for permanent pasture with ongoing farm activities and storage. As Bathgate has spread north and east, this has increased the conflict between the existing legitimate farm uses and adjacent residential amenity. This conflict has been felt in both directions. The coexistence of the residential properties and the operational farm is unsustainable;

The two uses, in such close proximity, do not make good bedfellows. Should the land be sold and developed, the resulting development would form a much more harmonious, appropriate, attractive, well-planned and defensible north-eastern boundary to Bathgate, enabling far greater public access to the countryside whilst also completing the eastward spread of the town in a far less piecemeal fashion.



Cala Management Ltd.

Site reference – MIRQ0134 - Bughtknowes Farm, Bathgate

Representation to Proposed West Lothian Local Development Plan – November 2015

There has been a catalogue of **conflicts** in recent years involving noise pollution, trespass, the poisoning of cattle and dogs being set on the Bughtknowes landowner. Local residents have formed gates in their rear fencing to allow direct access, but it is direct access onto private land (with associated health and safety risks), a situation that could be resolved if the land became a mixture of compatible residential development or formal open space.

This was emphasized recently during Guy Fawkes celebrations when for at least 7 days, fireworks were set off and bonfires lit in close proximity to the farm each evening causing severe distress to cattle and other farm animals. This is a very real and credible safety problem given the storage of flammable and combustible materials at Bughtknowes. This distress has, in previous years led to the death of cattle. This specific conflict is a direct result of the adjacency of incompatible uses, a situation wholly as a result of previous spatial strategies/planning decisions by West Lothian Council.

This is an established farm, now severely compromised by the north-east expansion of Bathgate, an expansion endorsed by West Lothian Council in allocating land and granting planning permissions over the years.

The proposed residential and open space development affords the authority an opportunity to end a growing conflict between land uses and create an attractive, high quality and defensible boundary to Bathgate, providing much needed homes to the area, at a location ore likely to benefit Bathgate whilst simultaneously promoting improved and increased access to the countryside for the residents of Bathgate and the wider area.

Effectiveness

In assessing likely or allocated housing sites, it is important to understand the likelihood that they will be developed and the potential constraints that may exist that could delay the development of these sites. Paragraph 55 in PAN 2/2010 outlines a set of criteria to test the effectiveness of a potential housing site. Bughtknowes responds favourably to the criteria on **ownership, contamination, physical characteristics, deficit funding, marketability, infrastructure and land use**: It is an effective site.

The deliverability of the site is considered to be a key advantage when compared to other housing allocations across West Lothian. The land is under the control of CALA with a willing landowner keen to help deliver the whole project, critically including the provision of public open space. There are no obstacles to the delivery of development in the short to medium term;

Whilst the whole of the Bughtknowes Farm currently lies within the AGLV, the proposed development would not result in a detrimental impact in terms of landscape, natural, built and cultural heritage, biodiversity or the wider environment. The Bughtknowes site occupies less than one percent of the AGLV designated land.



Cala Management Ltd.

Site reference – MIRQ0134 - Bughtknowes Farm, Bathgate

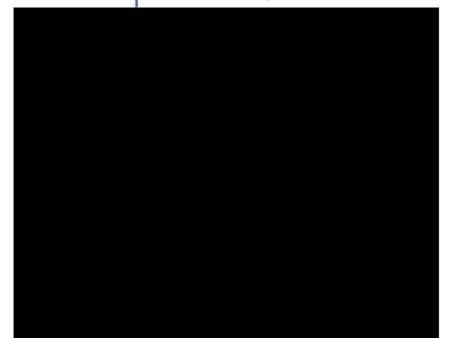
Representation to Proposed West Lothian Local Development Plan – November 2015

We maintain that the coordinated allocation and development of the land will significantly enhance the natural and built form in this part of Bathgate. The residential development will help create an appropriate and defensible boundary whilst there will be considerable community benefit derived from the provision of more formalised and accessible open space.

The creation of a 10 hectare public park would be a notable resource for Bathgate, opening up Petershill Nature Reserve and the countryside beyond to the residents of Bathgate. Bughtknowes Farm also controls land on the south side of Drumcross Road, enabling significant improvements to be made to the road to build on this increased and improved access to the Countryside.

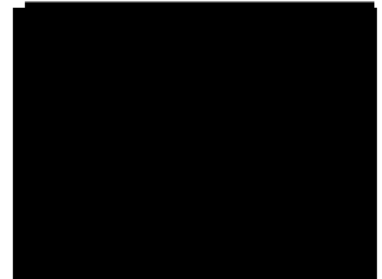
Overall, this proposal represents an opportunity to provide much needed homes alongside improved and increased open space and countryside access in an area already adjacent to housing areas, the spread of which has caused conflict with the traditional land uses.

apt planning &
development



By email

**Development Planning
West Lothian Council
County Buildings
High Street
Linlithgow
EH49 7EZ**



Dear Sir,

Friday 17th October 2014

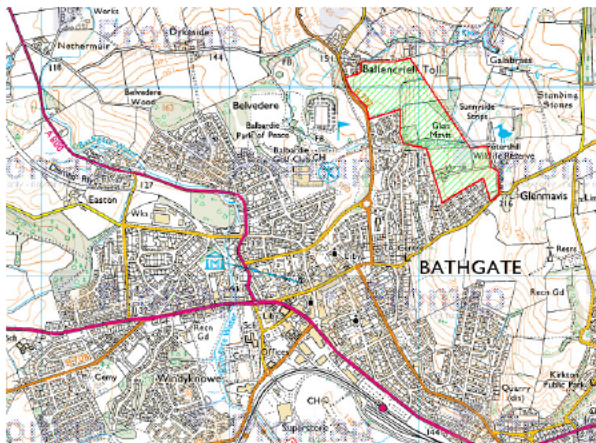
**West Lothian Local Development Plan – Main Issues Report
Representation on behalf of CALA Management Ltd.
Land at Bughtknowes Farm, Bathgate**

With regards to the above consultation on the Local Development Plan, please find attached representations with regards to the promotion of land at Bughtknowes Farm in part for residential development but also for the provision of much needed public open space to the north-east of Bathgate.

This letter forms our response to the MIR and covers many of the pertinent topics covered in the Main Issues Questionnaire. We have not therefore lodged a copy of the Questionnaire in addition to this letter and accompanying Indicative Development Concept.

Site Characteristics

Overall, the land covers approximately 24 hectares. It can be split roughly into three parts. The northern part of the site measuring 6 hectares (and subject to Call for Sites reference EOI-0081) and intended for mainly residential development, the central area, measuring 10 hectares which is intended to be dedicated to providing high quality open space, enabling better access to the countryside (including Petershill Nature Reserve to the east) and an 8 hectare area around the existing Bughtknowes Farm in the southern part of the site (Main Issues Ref: EOI-0080), which is also intended to be developed mainly for housing.

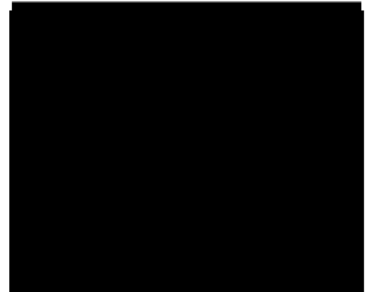


This area of land covers a distinct area to the north and east of Bathgate Town Centre and in the short-medium term can be developed to create an appropriate, attractive and defensible boundary for Bathgate.

Further to the north and east, the land slopes up and away from Bathgate, taking on a far more countryside/rural character. In creating a far better and formalised access to this area, through the delivery of a c10 hectare area of public open space, we are able to explicitly encourage access to the Countryside beyond.

CALA Management lodged a submission at the Call for Sites stage of the LDP Preparation. In hindsight, this should also have promoted the combined promotion of both housing sites alongside a central '*park*' area. This was always the intention of any future development/allocation and whilst it was outlined in the submission (Page 5, May 2011 document) it should have been stated explicitly from the outset as part of a wider masterplan for the Bughtknowes landholding.

The provision of a formalised area of open space/parkland is especially pertinent given the lack of such areas in the Bathgate area. Beecraigs Country Park is often declared a resource for Bathgate residents. In truth it is very much seen as a Country Park linked closely to Linlithgow. Access is not particularly easy from Bathgate, the proposals at Bughtknowes Farm, coupled with better access to Petershill will at least provide an attractive and formalised area of open space and countryside easily accessible to Bathgate residents, providing an important resource for the town.



The previous submissions in favour of residential development (EOI-0080 and 0081) were not preferred in the emerging LDP for the following reasons:

- **The site is out with the core development areas and other housing allocations.**
 - We acknowledge that the sites fall out with current preferred sites for future residential development. However as the accompanying plans illustrate, this is a site specific opportunity wherein the landowner is seeking to donate a significant proportion of the land (10hectares) to enable a parkland area, encouraging greater public access to the countryside and Petershill Nature Reserve.
 - The current landowner also owns land on the south side of Drumcross Road which could be incorporated into any future proposal to enable road improvements to improve vehicular/pedestrian/cycle access to the countryside to the north-east of Bathgate (and especially Petershill Nature Reserve as a valuable local countryside asset.
 - Within this context, residential development on the Torphichen Road site and land surrounding Bughtknowes Farm would both provide attractive housing sites and be capable of providing a range and mix of house types and tenures. In addition, the reallocation and development of this land would solve the current conflict resulting in the incompatible neighbouring land-uses between Bughtknowes Farm and nearby homes.

- **There are more suitable sites for development**
 - Across West Lothian and Bathgate there will always be a range of sites capable of meeting the required housing land allocations in any given LDP period.
 - We would argue that given our most up to date consideration of a joint promotion of EOI-0080 and EOI-0081 alongside the public park and countryside access proposals, this is an eminently deliverable and suitable site for a future mixed use development.
 - The site is effective and capable of delivering houses within the first LDP 5-year period.
 - We would also stress that in allocating land at Bughtknowes Farm, West Lothian Council would be directing development to a part of the town that would directly relate to its surroundings, with a high likelihood that residents would use local shops and services. Other major allocations, specifically at Wester Inch do not relate to their locations, instead making it so easy for residents to work, shop and entertain away from Bathgate, significantly limiting their beneficial social and economic impacts. This further highlights the appropriateness of the Bughtknowes Farm site.

- **Development would be a physically, visually and environmentally intrusive expansion of Bathgate beyond the limit of development already provided for.**
 - The proposal on the east side of Torphichen Road does indeed rise up from the roadside. It is adjacent to Mavis Bank, a previous modern housing development, with very similar characteristics, being built on a sloping site to the north east of the existing built environment.
 - The Torphichen Road site would merge seamlessly into this development whilst providing a northern entrance into the wider Bughtknowes landholding (and more wide ranging public access proposals). This would also create a natural link to the sports centre/golf course on the far side of Torphichen Road.
 - The public park element of the proposals would be entirely in-keeping with the surrounding area whilst seeking to formalise this access to encourage more people to use this part of the town (which is currently privately owned). Through its definition and management, this would create the ideal transition between town and country.
 - The proposed development land at Bughtknowes Farm would not be visually intrusive to Bathgate. It is hidden from the wider area and would be in keeping with neighbouring residential development to the south and west. Outwith the site boundary the land rises to the east giving the site an element of enclosure. Mature landscaping to the north and south (opposite side of Drumcross Road) also increase this enclosure. The Bughtknowes Farm element of these proposals forms a very obvious and appropriate extension to this area of Bathgate.

- **The site lies within the AGLV (and emerging Special Landscape Area), serving as an attractive backdrop to Bathgate**
 - It is acknowledged that the site at Bughtknowes Farm falls within the Bathgate Hills and River Avon Valley Area of Great Landscape Value (AGLV).
 - The AGLV covers a large area extending eastwards from the town. The area of land that is the subject of this representation accounts for **less than one percent** of the AGLV and the release of the land at Bughtknowes Farm for a mixed-use development will have no discernible impact upon the aims and objectives of the designation at this location for the following reasons:
 - Much of the site is enclosed by a combination of natural slopes, woodland and former reservoir walls. While acknowledging these features, the site does not possess the same visual appearance and landscape characteristics for which the wider AGLV was designated;
 - Development would be set against the backdrop of the rising landform, and would not constitute skyline development;
 - The boundary of the AGLV is currently defined by the settlement edge. To the south of the site, the boundary of the existing Drumcross Road housing is formed by timber garden fences, and indeed the existing road layout allowed for future access into the Bughtknowes Farm fields.
 - The established tree belt at Glen Mavis to the north, and the rising topography and grass berm of the former reservoir to the east would constitute much more appropriate features to delineate the edge of the AGLV and provide a much more robust settlement boundary;

- The boundary of the AGLV has previously been amended to accommodate development. There is no reason why a further amendment to the AGLV cannot be made to accommodate development at Torphichen Road and Drumcross Road whilst acknowledging the significant improvements to the 10 hectares in between the two potential residential development sites;
- Even where the AGLV remains in place, this designation does not preclude the principle of development per se as demonstrated at Ballencrieff Reservoir where the construction of a large dwellinghouse, restaurant, wedding and conference venue has been permitted;
- It is considered that, subject to careful masterplanning, the release of land for development would have a negligible impact on the integrity of the wider AGLV designation, a point emphasised by the creation of a 10 hectare public park which could be managed to enhance this area of the AGLV. Indeed, in assessing the site during the previous Local Plan Inquiry, the Reporter agreed that *“the site cannot be described as outstanding”* (Paragraph 5.29).

Existing Land Uses

The Bughtknowes Farm land is currently used for rough grazing and ongoing farm activities and storage. As Bathgate has spread north and east, this has increased the conflict between the existing farm uses and residential amenity. This conflict has been felt in both directions. As a result, the owner of Bughtknowes Farm is looking to leave the farm hence his willingness to donate many acres of the farm estate to provide the public park area and help define the north east edge of Bathgate. The coexistence of the residential properties and the operational farm is unsustainable;

- The farm landholding has become increasingly **fragmented**;
- **Public Health Risks** such as E-Coli associated with farming activities are well documented including the potential for local watercourses to become polluted. The proximity of the farm to the town increases the number of incidents of children coming into contact with the animals or entering the farm site unsupervised to retrieve balls etc. with associated health and safety risks;
- **Proximity of Livestock** to residential areas – the existing cattle shed lies within close proximity to Glenmavis Housing Estate leading to visual, noise and odour nuisance;
- **Fertiliser Storage** – farming operations require the storage of large quantities of fertiliser with associated health and safety issues including the risk of explosion. Security is also a well-documented issue with respect to fertiliser storage. Current advice for farmers from the Health and Safety Executive recommends that fertiliser is stored in areas public access where it is not visible from the public highway. The current farm arrangement does not allow the recommended safety/security measures to be achieved;
- **Odour Nuisance** – farming activities may be restricted where odour complaints are an issue, even from residential developments which are created long after the farm was established and operated satisfactorily and without challenge – this cannot happen at Bughtknowes;
- Guidance contained within the Scottish Government’s Code of Good Practice states that **Manure Spreading** should not be undertaken close to domestic or public buildings while storage should be as far from residential housing as possible. Land use conflicts are much more likely to occur where the farm lies within close proximity to residential areas as in this case; and,

- **Lack of Room for Expansion** – Scottish Government advice requires new cattle sheds and slurry store sites to be located more than 400m from residential development leaving little opportunity for the extension of the farm steading at Bughtknowes (see Prevention of Environmental Pollution from Agricultural Activity, Code of Good Practice).
- There is a catalogue of **conflicts** in recent years involving noise pollution, trespass, the poisoning of cattle and dogs being set on the Bughtknowes landowner. Local residents have formed gates in their rear fencing to allow direct access, but it is direct access onto private land, a situation that could be resolved if the land became a mixture of compatible residential development or formal open space.

This is an established farm, now severely compromised by the north-east expansion of Bathgate, an expansion endorsed by West Lothian Council in allocating land and granting planning permissions over the years. The proposed residential and open space development affords the authority an opportunity to end a growing conflict between land uses and create an attractive, high quality and defensible boundary to Bathgate whilst simultaneously promoting improved and increased access to the countryside for the residents of Bathgate and the wider area.

Effectiveness

In assessing likely or allocated housing sites, it is important to understand the likelihood that they will be developed and the potential constraints that may exist that could delay the development of these sites. In the past authorities have '*banked*' housing numbers by allocating sites that have not come forward within a local plan period. This is not creating a '*roof over heads*' policy. Paragraph 55 in PAN 2/2010 outlines a set of criteria to test the effectiveness of a potential housing site. We have tested the land at Bughtknowes against the criteria:

- **Ownership** – all of the land, being promoted for both residential and amenity open space is in a single ownership. Furthermore CALA Management Ltd. controls the land and will be capable of implementing any future planning permission;
- **Contamination** – with the minor exception of ongoing and historic farming use, there is no known contamination of the previously undeveloped land;
- **Physical** – there are no constraints to development within the context of a comprehensive mixed-use proposal incorporating residential development and extensive public open space. Existing slopes will be taken into account during any detailed design, and the landowner controls land surrounding the constrained roadway to the south (Drumcross Road);
- **Deficit funding** – not required;
- **Marketability** – CALA Management Ltd. contends that the site is an attractive location for a wide mix of attractive and market facing residential development, further enhanced through the creation of a high quality area of open space enabling access to the wider countryside and Petershill Nature Reserve;
- **Infrastructure** – we understand there to be pressures on the education infrastructure, however CALA and the landowner are happy to work with West Lothian Council to address these concerns;
- **Land Use** – as the remainder of this document, we contend that the proposed comprehensive approach to the north-eastern edge of Bathgate present a robust, appropriate and attractive mix of uses, that importantly will also remove a historic but not conflicting land use from the area.

The deliverability of the site is considered to be a key advantage when compared to other housing allocations across West Lothian. The land is under the control of CALA with a willing landowner keen to help deliver the whole project, critically including the provision of public open space. There are no obstacles to the delivery of development in the short to medium term;

Whilst the whole of the Bughtknowes Farm currently lies within the AGLV, the proposed development would not result in a detrimental impact in terms of landscape, natural, built and cultural heritage, biodiversity or the wider environment. The Bughtknowes site occupies less than one percent of the AGLV designated land.

West Lothian Local Development Plan – Main Issues Report

As mentioned at the outset, we are not submitting a completed questionnaire, preferring to lodge this letter and the Indicative Development Proposal document. However we do make comment on certain aspects below.

West Lothian Council sets out four key objectives in their strategy towards housing land provision (paragraph 3.37). We contend that the Bughtknowes Farm land satisfies these objectives as follows:

- We maintain that the coordinated allocation and development of the land will significantly enhance the natural and built form in this part of Bathgate. The residential development will help create an appropriate and defensible boundary whilst there will be considerable community benefit derived from the provision of more formalised and accessible open space.
- Whilst there will be ongoing negotiations with regards to the necessary infrastructure to accommodate all levels of growth across West Lothian and the Bathgate area, the Bughtknowes Farm land will help create additional public funds, whilst making a very real contribution to the social infrastructure by creating the 10 hectare public park linking the residential areas and providing improved access to Petershill Nature Reserve and the countryside beyond.
- The allocation of the two portions of the site (both effective) for residential development will help West Lothian Council to meet their five-year housing supply; and
- CALA Management and the landowner expect to fully comply with current and future affordable housing policies.

In providing for increased access to the countryside, these proposals will also contribute towards Council **Priority 6 – Health, Life Expectancy and Physical and Mental Wellbeing.**

West Lothian Council must be applauded for their Preferred Approach to housing land provision, adopting a robust position in allocating land to deliver 15% more homes than required through the SESPlan process. The Council is seeking to support a growing economy and to underpin the attractiveness of West Lothian to developers and residents alike.

The Council has recognised a previous reliance on a small number of large allocations, exposing the Council and the market to variations in completion rates at these sites. The Council has therefore sought to also consider a number of smaller, effective sites offering a wider mix of house type across a more varied choice of locations.

The Council must continue to allow greater flexibility in housing land allocations to act as a catalyst and enable the market to recover as fast and as creatively as possible. By allocating further land for smaller-scale (and in this case high quality) development it creates a situation whereby the likelihood of the development being completed in a short time frame and easily within the initial 5 year cycle is greatly increased, creating certainty around the housing supply issue.

At **Question 20**, we support the removal of ineffective sites. Given the recession of the past number of years, there are now sites that are no longer viable, or cannot secure development finance. These must be removed from the effective land supply and retained as constrained sites.

At **Question 23 and 26**, we support the continued promotion of Winchburgh and Heartlands, on the proviso that monitoring is undertaken to understand ongoing build rates and therefore adopt realistic expectations of their contribution to the housing land supply in the short, medium and longer term.

At **Question 35** we support the review of affordable housing provision in West Lothian. This is an opportunity to engage with consultants, developers and landowners (as well as providers) to understand the impact that affordable housing is having on developments whether on the overall viability or on the land values and house prices, compromised by the presence of affordable housing on a shared site. There are no easy answers and the review is welcomed.

In seeking to allocate the land at Bughtknowes Farm, CALA Management represents a credible developer with a proven track record of delivering high quality residential developments within a stipulated timeframe and in **accordance with PAN 2/2010 on effectiveness**.

Furthermore and in conjunction with the landowner, CALA is proposing a major investment in the creation of an area of public open space to help define the eastern edge of Bathgate whilst simultaneously encouraging access to the wide countryside through to Petershill Nature Reserve and beyond.

Summary

CALA Management is promoting land at Bughtknowes Farm for a mixed-use proposal involving residential development and the creation of a public park, increasing and improving access to Petershill Nature Reserve and the countryside beyond.

Representation was made to the Call for Sites, though at the time the interrelationship between the proposals had not been fully explored. All the land is owned and occupied by the owners of Bughtknowes Farm. For reasons given in this document the site is effective the single ownership and single option agreement with CALA Management further emphasising this. In response to the earlier comments in response to the Call for Sites, we do contend that this is an entirely appropriate site for development, offering wider ranging housing and social/community related benefits.

As Bathgate as grown incrementally to the north and east, the Farm has become fragmented and the nature of the encroachment of the residential areas has led to significant and regular tension and conflict. The two uses, in such close proximity, do not make good bedfellows. Should the land be sold and developed, the resulting development would form a much more harmonious, appropriate, attractive, well-planned and defensible north-eastern boundary to Bathgate, enabling far greater public access to the countryside whilst also completing the eastward spread of the town in a far less piecemeal fashion.

The land has the opportunity to contribute towards the short-term five-year land supply, with the potential to deliver a mix of high quality homes of a range of sizes to the Bathgate area at a very attractive location. It is an effective site.

The creation of a 10 hectare public park would be a notable resource for Bathgate, opening up Petershill Nature Reserve and the countryside beyond to the residents of Bathgate. Bughtknowes Farm also controls land on the south side of Drumcross Road, enabling significant improvements to be made to the road to build on this increased and improved access to the Countryside. In addition the land represents less than one percent of the AGLV and its careful development and design would have no detrimental impact on the character or integrity of the wider AGLV and would represent an enhancement of certain aspects.

Overall, this proposal represents an opportunity to provide much needed homes alongside improved and increased open space and countryside access in an area already adjacent to housing areas, the spread of which has caused conflict with the traditional land uses.

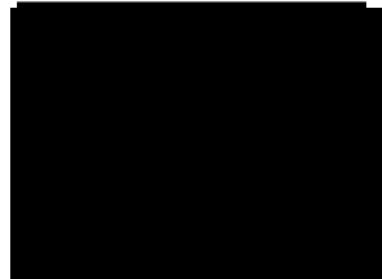
I look forward to receiving confirmation that this representation has been received, and should you have any further questions regarding our submission, we would be delighted to provide any information requested.

With kind regards

Yours faithfully



Tony Thomas
Director



TORPHICHEN ROAD & DRUMCROSS ROAD, BATHGATE

INDICATIVE DEVELOPMENT PROPOSAL
CALA Management Limited
OCTOBER 2014





CONTENTS

1.0 INTRODUCTION

2.0 THE CONTEXT

3.0 THE SITE

4.0 CONSTRAINTS & OPPORTUNITIES

5.0 LANDSCAPE

6.0 LDP CONTEXT

7.0 CONCEPT

8.0 POTENTIAL FEATURES

9.0 LAYOUT

10.0 ARCHITECTURE / MATERIALS

11.0 CONCLUSION

1.0 : INTRODUCTION

1.0 INTRODUCTION

This document has been prepared in support of land at Bughtknowes Farm and its inclusion within the emerging Local Development Plan.

The approach has been to outline the characteristics of the site including development constraints and opportunities.

We have used this information to develop a concept and outline proposals for the site.

Author
EMA Architects + Masterplanners





Torphichen Road Land

VIEW OF SITE LOOKING EAST FROM BALBARDIE PARK OF PEACE SHOWING CLOSE PROXIMITY TO LOCAL FACILITIES AND EXISTING RESIDENTIAL SETTLEMENTS

2.0 : THE CONTEXT





2.0: THE CONTEXT

The town of Bathgate is strategically located to take advantage of the surrounding road network with the M8 providing access into Glasgow and Edinburgh. The town is also well served by the local public transport network and railway station. The train provides connection to Glasgow Queen Street and Edinburgh Waverley on a regular basis.

There is a broad range of local amenities within the town centre from local shops, cafes, pubs and supermarkets. The Balbardie Park of Peace is located immediately to the west of the site with a wide range of public facilities from public sports pitches, golf course, outdoor play provisions and health and fitness centre.

There are a number of schools with Balbardie Primary School and Bathgate Academy in close proximity to the site.

Housing within the area generally comprises of traditional two storey dwellings. There are a number of 3 storey flats located on Torphichen Road (Mavis Bank) and the materials found within the town are traditional with a mixture of stone, render, brick and tiled roofs.



3.0 : THE SITE



VIEW FROM SITE SHOWING HOUSING IN CLOSE PROXIMITY TO AGRICULTURE RESULTING IN SOCIAL AND ENVIRONMENTAL ISSUES



3.0: THE SITE

The site is located to the north eastern edge of Bathgate on the Torphichen Road and Drumcross Road. The south and west of the site is bounded by residential development which forms the current and tightly drawn settlement boundary.

To the east of the site lies the Petershill Wildlife Reserve and the Balbardie Park of Peace sits to the west, with the Bughtknowes Farm site sitting within the Bathgate Hills and River Avon Valley AGLV.



3.0 : THE SITE



VIEW FROM BUGTKNOWES FARM LOOKING TOWARDS TOWN CENTRE SHOWING AGRICULTURAL LAND IN CLOSE PROXIMITY TO EXISTING SETTLEMENT EDGE

The gradual north east spread of Bathgate leads to a number of conflicting land uses with agricultural land being located too close to existing residential settlements. Proximity to existing housing is resulting in significant social and environmental issues that would be resolved through a well designed development.



VIEW LOOKING SOUTH EAST TOWARDS GALABRAES CRESCENT SHOWING AGRICULTURAL LAND IN CONFLICT WITH EXISTING DWELLINGS



VIEW FROM SITE SHOWING CURRENT SETTLEMENT EDGE TO THE SOUTH



VIEW ALONG FARM TRACK



VIEW FROM THE END OF BUGTKNOWES DRIVE SHOWING FARMING LAND IN CLOSE PROXIMITY TO DWELLINGS

4.0 : CONSTRAINTS & OPPORTUNITIES

The site is constrained by a number of important features along each of its edges.

The Torphichen Road bounds the west of the site with the Drumcross Road containing the southern edge. These roads allow ideal opportunity for access and connection to existing infrastructure (with potential for improvements to Drumcross Road to improve access to Bughtknowes, Petershill and beyond).

The Petershill Wildlife Reserve is located to the south eastern edge of the site with well established woodland and burn corridors to the east.

The site lies between existing residential settlements to the north and south.

The site provides an opportunity to improve the settlement edge of Bathgate and increase access to the burn corridors through open spaces that connect to the existing walking routes. There is also an opportunity to link the Balbardie Park of Peace and the surrounding residential properties with a proposed new public park and connection to Petershill Wildlife Reserve.

There is an opportunity for the site to shape and reinforce the north east edge of the town and create a new, credible and defensible north-east boundary to Bathgate whilst delivering a wide range and type of much needed housing to the area.



BOUNDARY



EXISTING SETTLEMENT



EXISTING PRIMARY ROADS



EXISTING SECONDARY ROUTES



EXISTING WOODLAND



EXISTING BURN



POTENTIAL WOODLAND



POSSIBLE OPEN SPACE



POTENTIAL ACCESS POINT



POTENTIAL RECREATIONAL ROUTES



CONFLICT WITH EXISTING RESIDENTIAL USES

NORTH



BALBARDIE
PARK OF
PEACE

TORPHICHEN ROAD

PETERSHILL
WILDLIFE
RESERVE

DRUMCROSS ROAD

BATHGATE



5.0 : LANDSCAPE

The Bughtknowes Farm land at Torphichen Road and Drumcross Road sits within the Bathgate Hills and River Avon Valley AGLV. The existing landscape structure defines the site and would be retained and enhanced through the following:

- Strong landscape connection to the potential public park
- Existing burns within the site to become focal points with the potential for open spaces to be formed around these corridors
- Existing mature trees / hedge rows to be retained and reinforced
- Proposed new path network into public park to connect and improve recreational walking routes to Petershill Wildlife Reserve
- The site is against the backdrop of rising landform and suitable landscape treatment would provide an appropriate settlement edge to the town





EXISTING TRACK BETWEEN SITES



EXISTING BURN

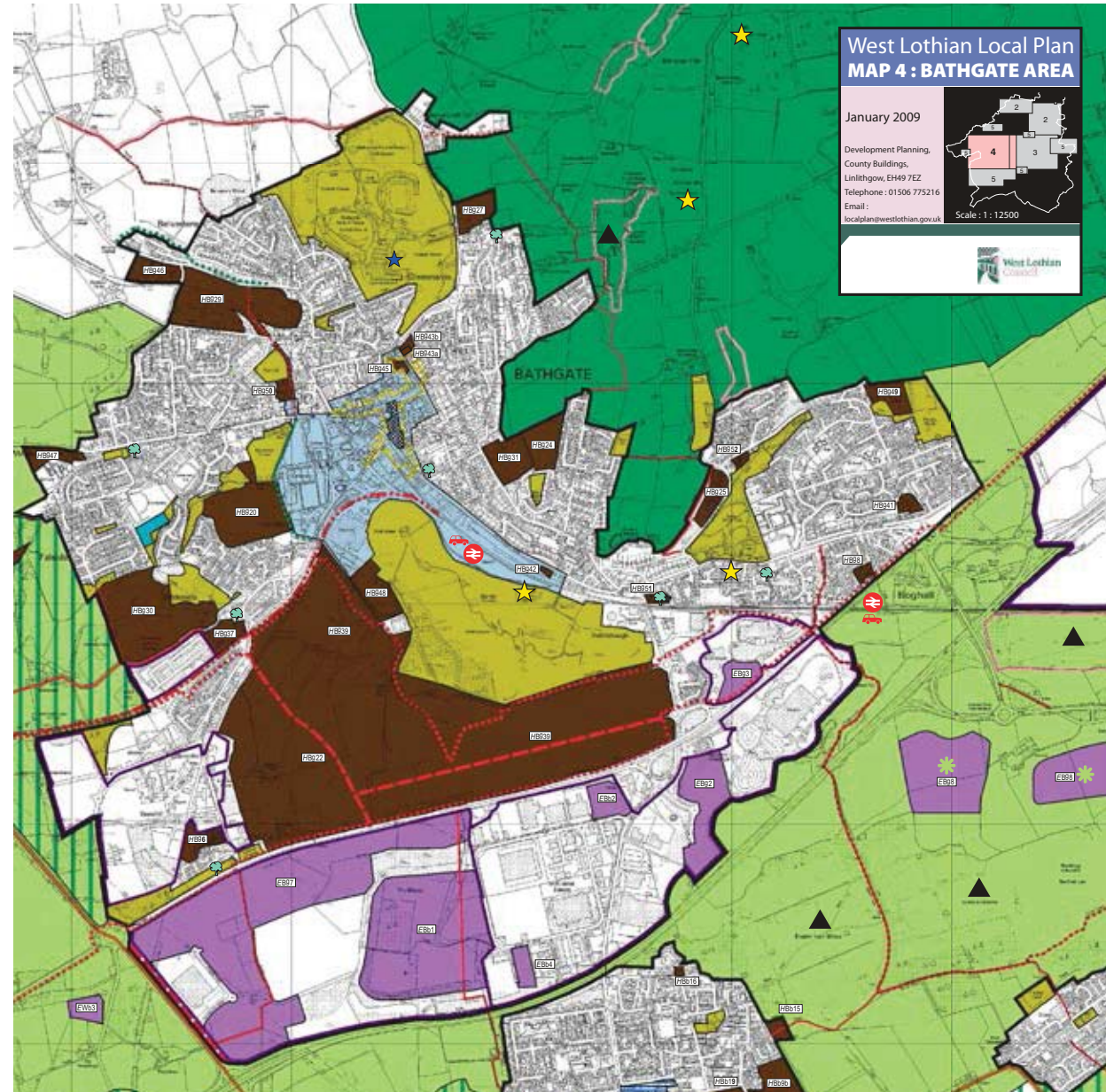


VIEW TOWARDS BATHGATE HIGH CHURCH
SHOWING SITES' CLOSE CONNECTIONS TO TOWN CENTRE

6.0 : LDP CONTEXT

We consider the land at Bughtknowes Farm to be appropriate for inclusion in the LDP and would summaries our response to previous concerns as follows:

1. The site is located within the settlement boundary and has good proximity to jobs and services. (See diagram)
2. The site is within the local public transport network with a number of bus stops along Torphichen Road
3. The site is well served by existing utilities and there are no issues with servicing the site. Any future development will be fully compliant with national guidance and latest technical standards on carbon reduction.
4. The site is located within the settlement boundary and is surrounded on 2/3 sides by existing residential developments. It is not considered to be a conspicuous or intrusive location for future development and it relates well to existing and adjacent housing area.
5. The proposed development will not result in coalescence and will potentially serve to reinforce the edge of settlement.
6. The site is not considered to be prime quality agricultural land due to it being located too close to housing. Proximity to existing housing is resulting in significant social and environmental issues which would be resolved through a well design new development.
7. Significant benefit will be derived from the creation of an area of enhanced public open space providing a transition from town to country and linking Bathgate to Petershill Nature Reserve and the countryside beyond.

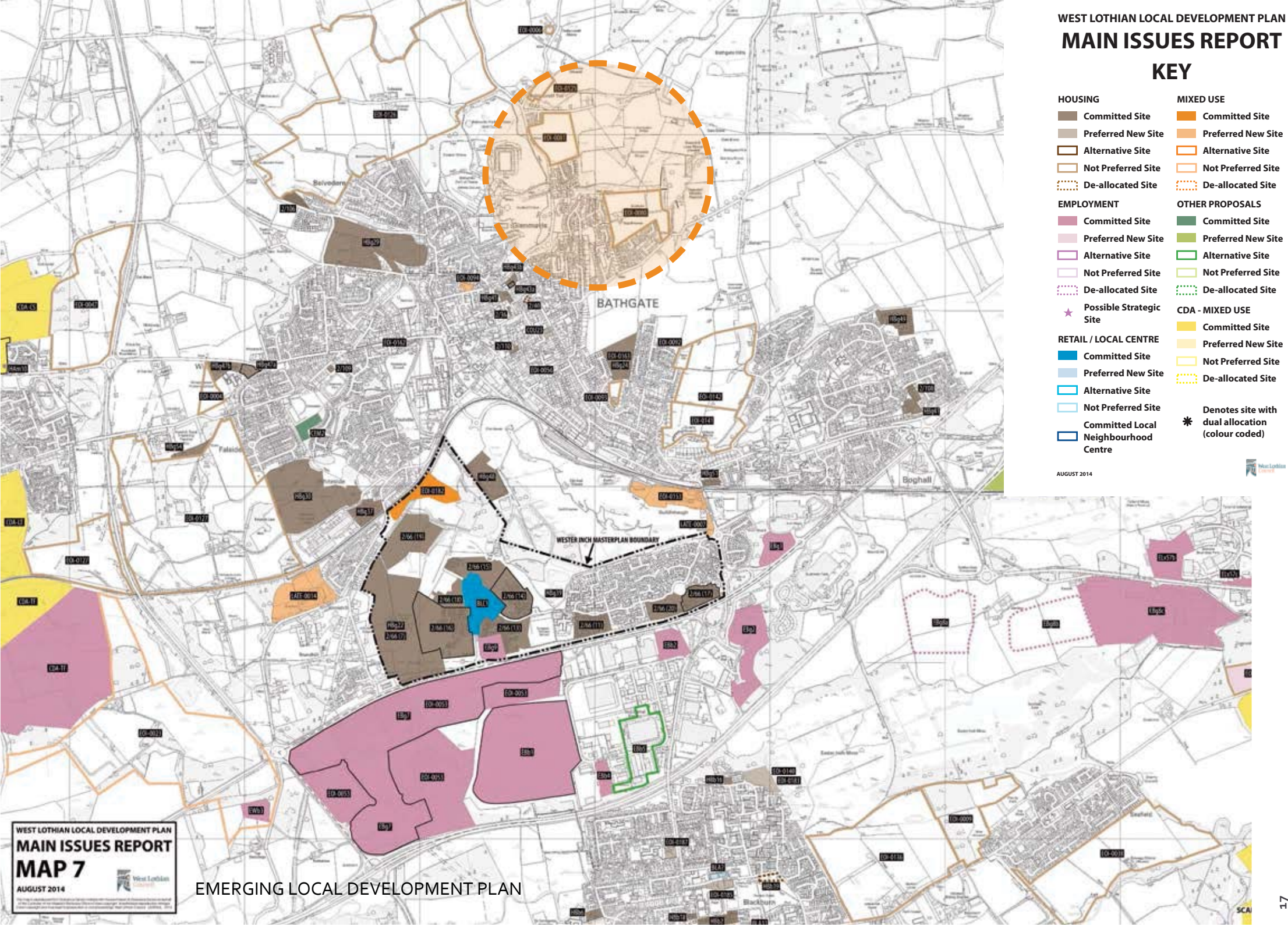


CURRENT LOCAL PLAN

KEY

- | | |
|--------------------------------------|--|
| HOUSING | MIXED USE |
| Committed Site | Committed Site |
| Preferred New Site | Preferred New Site |
| Alternative Site | Alternative Site |
| Not Preferred Site | Not Preferred Site |
| De-allocated Site | De-allocated Site |
| EMPLOYMENT | OTHER PROPOSALS |
| Committed Site | Committed Site |
| Preferred New Site | Preferred New Site |
| Alternative Site | Alternative Site |
| Not Preferred Site | Not Preferred Site |
| De-allocated Site | De-allocated Site |
| Possible Strategic Site | CDA - MIXED USE |
| RETAIL / LOCAL CENTRE | Committed Site |
| Committed Site | Preferred New Site |
| Preferred New Site | Not Preferred Site |
| Alternative Site | De-allocated Site |
| Not Preferred Site | |
| Committed Local Neighbourhood Centre | |
| | * Denotes site with dual allocation (colour coded) |

AUGUST 2014



7.0 : CONCEPT

The concept aims to take advantage of the opportunities which define the site:

1. Protect and enhance the existing woodland and landscape features
2. Reinforce the settlement edge of the town
3. Create a new public park in close proximity to the Petershill Wildlife Reserve for community wide use
4. Maximise connections and permeability through the site and into the proposed new public park
5. Provide a link between the existing Balbardie Park of Peace and the proposed new public park.
6. Deliver a network of recreational walking routes that link the housing pockets and the Petershill Wildlife Reserve
7. Take advantage of the natural contours and features of the site to maximise the views out over the surrounding area
8. Provide positive frontage to new lanes and courtyards within new neighbourhood
7. Provide much needed family housing within the area



EXISTING WOODLAND RETAINED / REINFORCED



PROPOSED PUBLIC PARK



PROPOSED HOUSING POCKETS



PROPOSED ACCESS CONNECTION



POTENTIAL NODE



POTENTIAL WALKING ROUTES



POTENTIAL FOOTPATH CONNECTIONS



POTENTIAL FOR ROAD / FOOTPATH IMPROVEMENTS



POTENTIAL CONNECTION TO COUNTRYSIDE

NORTH



BALBARDIE
PARK OF
PEACE

PROPOSED
PUBLIC PARK

PETERSHILL
WILDLIFE
RESERVE

BATHGATE



8.0 : LAYOUT

TORPHICHEN ROAD

The area of land is approximately 8Ha and the concept layout has been developed to incorporate family housing which will be appropriate in terms of scale and character to the surrounding area.

The new neighbourhood would be 2 storey in line with the surround housing with materials and architectural style in keeping with the local vernacular.

The site has the potential for generous open space with strong connections to the Balbardie Park of Peace and the proposed public park to the east.

A SUDS feature could be incorporated in an appropriate location combined with the current burn channels to provide a visual and landscape feature.



EXISTING WOODLAND RETAINED / REINFORCED



EXISTING BURN



PROPOSED OPEN SPACE



PROPOSED HOUSING POCKETS



PROPOSED ACCESS CONNECTION



POTENTIAL NODE POINTS



POTENTIAL PRIMARY ROUTES



POTENTIAL WALKING ROUTES



POTENTIAL CONNECTION TO COUNTRYSIDE



REINFORCE
WOODLAND

PROPOSED
PUBLIC PARK

OPEN SPACE

BALBARDIE
PARK OF PEACE

EXISTING
SETTLEMENT

NETWORK OF
WALKING
ROUTES

8.0 : LAYOUT

DRUMCROSS ROAD

The area of land at Drumcross Road is approximately 6Ha in area and the concept layout has been developed to provide a strong landscape connection to the proposed public park.

The new neighbourhood would continue the existing settlement to the north east of Bathgate with the potential to improve the eastern section of Drumcross Road. The area to the south of this road is in control of the landowner and alterations to widen the road would greatly improved pedestrian, vehicle and cycle links to Bathgate and the surrounding countryside.

The architectural style and materials would be in keeping with the surrounding area with the existing woodland to the north and Petershill Wildlife Reserve retained and reinforced.



ASPIRATIONAL IMAGE



EXISTING WOODLAND RETAINED / REINFORCED



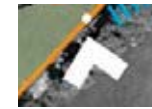
EXISTING BURN



PROPOSED OPEN SPACE



PROPOSED HOUSING POCKETS



PROPOSED ACCESS CONNECTION



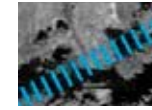
POTENTIAL NODE POINTS



POTENTIAL PRIMARY ROUTES



POTENTIAL WALKING ROUTES



POTENTIAL FOR ROAD / FOOTPATH IMPROVEMENTS



POTENTIAL CONNECTION TO COUNTRYSIDE

PROPOSED
PUBLIC PARK

PETERSHILL
WILDLIFE
RESERVE

EXISTING
SETTLEMENT

POTENTIAL
IMPROVEMENTS
TO ROAD



9.0 : POTENTIAL FEATURES



The proposed layout would accommodate the following features for the benefit of the proposed new dwellings and surrounding area:

- Generous and well designed open spaces
- Village greens
- Varied building line and frontage to open space
- Positive boundary treatments
- Access to and walking routes along existing burn channels
- Woodland Walks
- Large public park with well established landscape features
- Discreet pockets of development

ASPIRATIONAL IMAGE

LANDSCAPE ASPIRATIONS



SUDS



CYCLE ROUTES



PUBLIC SPACES



DISCREET DEVELOPMENT



WOODLAND WALKS

10.0 : ARCHITECTURE / MATERIALS



The proposed architecture and materials of the new development would be informed by the character of the surrounding area.

Simple traditional forms and detailing could provide the new area with a sense of place and identity from the outset.

Render and brick colours could be influenced by the colours of the existing buildings within Bathgate.

Recessive wet dash render colours with traditional tiled roofs would be appropriate.

Boundaries will be defined by hedges which draw from the existing features of the site and reflect the garden boundaries of existing housing within the area.

The layout of the streets, lanes and courtyards within the new neighbourhood would be developed in accordance with latest local and national guidance such as Creating Places and Designing Streets with a strong visual and physical connection to the potential public park.



HOUSING AT MAVIS BANK

11.0 : CONCLUSION

This site represents an excellent opportunity to provide much needed family housing within an area already suited to this type of development.

As demonstrated throughout the document the character of Bathgate would be preserved and the edge of settlement to the north east would be enhanced.

The formation of a public park would provide a strong linking element to the two residential pockets and provide usable public space for the surrounding residents and providing access to Petershill Nature Reserve and the countryside beyond.

The new neighbourhood could therefore play an important part in reinforcing the settlement boundary of Bathgate.





ASPIRATIONAL IMAGE

ema

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