

### Your details (mandatory)

Please indicate in what capacity you are making this submission:

- as an individual (and representing your own views)
- as a representative of a private or commercial organisation (and representing the views of that organisation)
- as a representative of a public organisation (and representing the views of that organisation)
- as an agent (and making comments on behalf of other individuals that you represent or third parties)
- other

Please complete the following contact information:

Name	<input type="text" value="Gladman Developments Ltd."/>
Email	<input type="text"/>
Telephone	<input type="text"/>
Address	<input type="text"/>
Organisation name	<input type="text" value="Gladman Developments Ltd."/>
Client's name	<input type="text"/>

### 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	<input type="text" value="EOI-0126"/>
Enter MIRQ ( <i>Main Issues Report</i> ) reference here	<input type="text" value="MIRQ0121"/>

### 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

**Please use this form for sections:** Foreword; Background; Context; Role and Purpose of Plan; Vision Statement and Aims; The Spatial Strategy (including Policy Framework); Appendices; Glossary; Proposal Maps; Strategic Environmental Assessment (SEA) Environmental Report; Equalities and Human Rights Impact Assessment (EQHRIA); Strategic Flood Risk Assessment (SFRA); Habitats Regulations Appraisal; Transport Appraisal (TA); and Action Programme.

Section title

Page nos.

Paragraph nos.

As set out in Gladman's representations to the Proposed Plan and in the supporting Planning and Delivery Statement, based on the latest housing land audit (2014) the Council has at best 2.6 years supply of effective housing land. The Council continue to rely on committed sites that have historically failed to deliver housing units on the ground. The Council is relying on these constrained sites to now come forward in order to meet future housing requirement. This creates a significant risk that the Council will continue to have a shortfall in effective housing land up to and beyond 2024.

The opportunity remains for the Council to allocate additional housing land that has potential to deliver new housing in the period up to 2019, and steady and reliable housing delivery beyond this. Additional allocations will add greater flexibility and certainty to the housing land supply to safeguard against future failure. Bathgate is a key settlement within the Strategic Development Area (SDA); recognised as accessible and well placed for investment and growth, yet the LDP proposes no new significant housing land allocations in the town in the period to 2024.

With this considered and in the face of a significant housing shortfall, Gladman propose that land at Dykeside Farm should be allocated for residential development in the LDP as an effective option for delivering significant and very much required housing land in Bathgate.

These comments are supported by a Planning and Delivery Statement appended to the representation form and this must be taken into consideration as part of our complete response.

Section title

Page nos.

Paragraph nos.

The land at Dykeside Farm does not currently form part of the Area of Great Landscape Value (AGLV) in the adopted West Lothian Local Plan. However, in the Proposed Plan, AGLVs have been replaced with Special Landscape Areas (SLA) and the site at Dykeside Farm is proposed to be incorporated into the SLA boundary.

Gladman objected to this in their submission to the MIR consultation with evidence to support the objection provided in a Landscape and Visual Appraisal undertaken by Ian White Associates Landscape Architects (IWA). This evidence does not appear to have been considered by the Council. Gladman maintains the objection in this representation to the Proposed Plan.

IWA has undertaken a detailed review of landscape character in this locality through the LVA and the supplementary 'Rebuttal of the proposed Bathgate Hills SLA boundary'. These submissions highlight that the SLA boundary includes a significant area of low quality landscape whose designation does not meet the selection criteria, does not benefit the definition of a robust SLA boundary and is unnecessary to protect the integrity of the landscape character of the core area (of the SLA). Field study has revealed that the boundary does not reflect distinctive and robust features and that, as acknowledged in other parts of the Bathgate Hills SLA, minor roads provide a more suitable boundary.

The principal characteristics of the Bathgate Hills SLA would not be undermined if the land at Dykeside Farm was rightly excluded from the SLA and made available for development.

These comments are supported by the 'Rebuttal of Proposed Bathgate Hills SLA Boundary Statement' and the 'Landscape and Visual Appraisal' appended to the representation form and this must be taken into consideration as part of our complete response.

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

Settlement	Bathgate		
Site address / location			
Site Ref		Page nos.	81-82

Bathgate is a key settlement within the West Lothian SDA; recognised as accessible and well placed for investment and growth, yet the Proposed Plan proposes no new significant housing land allocations in the town in the period to 2024. Land at Dykeside Farm provides an attractive, accessible and effective option for the planned growth of Bathgate during the LDP period. This proposal is for an economically viable stand-alone development, delivering all requisite infrastructure on a developer funded basis, meeting key concerns of West Lothian Council.

We would urge the Council to fully consider this proposal and include the site as a housing allocation in the LDP. The Indicative Masterplan Framework in Appendix D of the Planning and Delivery Statement and the supporting Landscape and Visual Appraisal demonstrate how a high quality residential development is capable of being delivered in this sustainable location without causing harm to the wider landscape.

These comments are supported by the Planning and Delivery Statement, Rebuttal of Proposed Bathgate Hills SLA Boundary Statement and Landscape and Visual Appraisal appended to the representation forms and these must be taken into consideration as part of our complete response.

Settlement			
Site address / location			
Site Ref		Page nos.	

## Additional comments

Please use this space to add any additional comments which have not been covered elsewhere in this questionnaire.

In addition to this form, please refer to:

- Additional Gladman representation forms
- Planning and Delivery Statement
- Rebuttal of Proposed Bathgate Hills SLA Boundary Statement
- Landscape and Visual Appraisal

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Section title

Page nos.

Paragraph nos.

Please see attached,

Section title

Page nos.

Paragraph nos.

Please see attached.

## **West Lothian LDP – Proposed Plan 2015 Consultation**

**Section Title:** Vision Statement and Aims

**Page Nos:** -

**Paragraph Nos:** -

**Comments:**

Gladman supports the overall vision of the LDP; capitalising on West Lothian's strategic location and supporting the CDA's, whilst also acknowledging the designation of the whole of West Lothian in the SDP as an SDA and encouraging development to meet regeneration needs and local objectives, whilst always maintaining an effective five-year supply of housing land. Our support for these CDAs and large expansion areas is conditional on them being genuinely effective and forming a part of an overall strategy, made up of these large sites and complementary smaller sites, with the larger sites unlocking infrastructure capacity for the whole of West Lothian.

**Section Title:** The Spatial Strategy – Development strategy

**Page Nos:**

**Paragraph Nos:**

**Comments:**

Gladman supports the content of Policy DES1

Gladman objects to the wording and aims of § 5.38, and the overall weight given to the HNDA2 in the Council's approach to its housing growth and target process. Whilst HNDA2 does have weight in the decision making process, it is clear that this weight is very limited. Recent appeal decisions by Ministers (notably in cases PPA-400-2045 and PPA-400-2046) that the HNDA is a policy-writing tool, not a decision-making one; and that in any event the policy which it is written to influence is strategic policy, not local policy. As there exists an adopted SDP with which the WLLDP must comply, the issue of reducing housing numbers to accord with the figures in HNDA2 is clearly a subversion of the intention of Ministers in approving the SDP.

Preparing the ground to reduce the LDP housing target to better accord with HNDA2 does not absolve the Council of its' duty to deliver the housing target set out in the current SDP nor does it excuse the Council from its' section 16 duty to maintain consistency between the LDP and the SDP.

Gladman supports the revision of the HLA format (§ 5.40) to show housing need and demand broken down by tenure type. However, this data should be presented in addition to the current format HLA, not instead of the current PAN2/2010 'requirement vs supply' format. Whilst Gladman supports the overall spatial strategy, we are concerned as to whether or not the approach to growth is entirely consistent with the approach to education infrastructure and wider infrastructure issues.

The Council suggests (at, for example §5.42) that it continues to support and promote development and continues to take a longer term view on growth, but at the same time, strongly states that all development is constrained by education infrastructure which must be addressed by the development industry and that an effective housing supply is only provided for "subject to the delivery of new education capacity".

Gladman objects to the format and content of Figure 5 (Page 22), particularly the inclusion of the third column which shows a housing land supply target for the period from 2009-2024. It is clear from SESplan and its Supplementary Guidance, as well as Ministerial correspondence in relation to that plan that the housing land requirement is to be considered as two separate periods from 2009-2019 and 2019-2024. This has been reinforced recently by the decision of Ministers in appeal reference PPA-230-2129 in which it was held that "the calculation of the housing land supply... [across a single 09-24 period]... was not in accordance with the SDP or the SG and that the council behaved unreasonably". It should also be noted that whilst Figure 3 acknowledges the additional requirements for housing allocations set out by the SESplan Supplementary Guidance, there is no further reference to these additional allocations.

In addition, the Council has shown a 'generosity allowance' in their housing land supply figures of 10%, but has not provided the "robust explanation" required by § 116 of SPP to justify this figure. The Council states in § 5.52 that it seeks to meet the requirements of SPP 2010 (as the SDP was developed to conform to that), but that merely states that the supply must be generous, not what the level of that generosity is to be. It is entirely reasonable to expect that the supply position be justified in line with the new guidance. Whilst we recognise that it is for the SDP to set the housing land supply target,



which, under SPP 2014 should include a robustly justified generosity allowance, we would note that as SPP 2014 now represents the up-to-date policy position of Scottish Ministers, West Lothian should, as other SESplan authorities have done, provide the SPP 2014 generosity allowance in the LDP.

We are also concerned that § 5.52 appears to be contrary to the vision of the Council to enable growth and house building, by 'preparing to fail'; identifying that new allocations may not deliver until after 2019, highlighting the inability of the Council to maintain a five-year supply in the short-term, and again highlighting how the whole strategy is in the hands of developers delivering infrastructure on other sites. This is despite a mechanism being in place within the SDP for making up any shortfall in housing land supply.

Our assessment of the current West Lothian housing land supply position, which demonstrates that the Council is failing to maintain a five-year effective housing land supply is below. The table also shows the effect of the range of the generosity allowance on the housing land supply position in West Lothian.

Description		Figure	Figure	Figure
West Lothian Housing Land Supply		No generosity applied	with SPP §116 10% generosity	with SPP §116 20% generosity
Housing requirement <i>Source: SESplan SG Housing Land</i> <i>Period: 2009-2019</i>	(a)	11,420	12,562	13,704
Length of plan	(b)	10	10	10
Annual housing requirement	(c)	1142	1256	1370
Completed plan years	(d)	5	5	5
Total housing completions in plan period	(e)	2,428	2,428	2,428
Net residual housing requirement	(f)	8,992	10,134	11,276
Years remaining	(g)	5	5	5
Net revised annual completion rate	(h)	1,798	2,027	2,255
5 year requirement adjusted against delivery	(i)	8992	10134	11276
Effective housing land supply (HLA 2014)	(j)	4791	4791	4791
<b>Number of years supply</b>	(k)	<b>2.66</b>	<b>2.36</b>	<b>2.12</b>
<b>Percentage of 5 year requirement</b>	(l)	<b>53%</b>	<b>47%</b>	<b>42%</b>

**Section Title:** The Spatial Strategy – Infrastructure issues

**Page Nos:**

**Paragraph Nos:**

**Comments:**

Whilst Gladman supports the over-arching concept set out in the plan and planning policy more broadly that infrastructure is required for development, and that it is appropriate for development to fund infrastructure, we object to the broad principal set out that all infrastructure should be forward-funded by the development industry.

This places an undue burden on the development industry which will see the desire for growth set out in the LDP trapped in a 'vicious circle' whereby development cannot happen for lack of infrastructure, but infrastructure cannot be funded for lack of development. It is therefore the role of the Council to 'take the first step' and proactively seek infrastructure solutions (for education in particular) in order to unlock development. The Council could then seek to recoup this funding from the development industry, in a similar manner as used in Edinburgh for the tram project and in Midlothian for the Borders Railway. Similarly, the Council must seek to ensure that the Core Development Areas, such as Winchburgh, contribute to the planned growth both by delivering units on their sites, and by delivering the infrastructure provided for by the relevant section 75 agreements and 'unlocking' development across West Lothian.

It is neither sustainable, nor consistent with the planning policy vision for Scotland as a whole, the South East of Scotland SDP area or West Lothian to continue to suggest that the entire LDP strategy hinges on one element of infrastructure provision, and then defer implementation of that to a third party. It is inappropriate in the context of planned-for growth in the SDP area to state that the delivery of education infrastructure on one site is the key to 'unlocking' the entire Council area for development, and that the Council will play no part in the delivery of that solution.

Fundamentally, we are concerned that the proposed plan, whilst allocating land for development, in addition to reaffirming the existing allocations and CDAs, is all conditional on infrastructure solutions (the plan states that "an effective supply is identified, subject to the delivery of new education capacity") which the Council does not seek to deliver itself ("a key requirement will be the need for developers to work together to fund and deliver new schools and key infrastructure" and "in the absence of increased funding from the Scottish Government to the Council, the onus of securing education provision the secure new development falls to developers"). The Council, as education authority, does have a statutory obligation to "*secure that there is made for their area adequate and efficient provision of school education*". As such, whilst there is a role for the development industry to play in assisting in solving education infrastructure issues, the Council is under a statutory obligation to educate pupils in their area, and this is not subservient to the planning regime.

Gladman therefore objects to the wording of Policy INF1, as it places the infrastructure burden solely on developers and the lack of flexibility in the wording will stifle development. The wording should be amended to allow more flexible funding options for infrastructure and the Council should examine ways to deliver and then recoup the costs of, infrastructure required to unlock the development required by the LDP strategy.

**Section Title:** The Spatial Strategy – Affordable Housing

**Page Nos:**

**Paragraph Nos:**

**Comments:**

Gladman supports the move towards a requirement for 25% affordable housing on residential sites within West Lothian. We would suggest that the Council should allow developers of residential sites to deliver the affordable housing on their sites themselves. This would leave the Council free to pursue its' affordable housing scheme on other sites and ultimately lead to higher levels of delivery of affordable housing, and in particular, social-rented housing, which the Council identifies as being in greatest need. The Council should be far more flexible in its approach to genuinely delivering the full range of affordable housing in addition to meeting their own manifesto goals on the social rented side; more private market housing can deliver more affordable housing integrated into individual developments, as affordable housing does not carry nil-value for private developers. The development industry can deliver a range of housing for the affordable sector, with new models being developed; including low cost, shared equity etc. The approach for only social rented by WLC is too narrow and won't deliver sufficient quantity. Council owned land should be used to deliver significant affordable housing and not sold (as several sites have been recently) for profit for private market housing.

**Section Title:** Action Programme

**Page Nos:**

**Paragraph Nos:**

**Comments:**

Gladman is concerned that the Action Programme, like much of the LDP places too much reliance on the development industry for funding and action, and that many of the actions identified are listed simply as "TBA" or "developer". This means that the Action Programme is little more than a list of projects required, rather than a programme which genuinely serves to implement the vision, aims and strategy of the LDP. The lack of specific timescales means that accurate development forecasting is impossible.

The Council should acknowledge the receipt/impact of s75 monies and increased council tax revenue from new development in terms of recouping cost for infrastructure which the council may have to bear in the short term.

**Section Title:** LDP Supplementary Guidance (SG) and Planning Guidance (PG)

**Page Nos:**

**Paragraph Nos:**

**Comments:**

Gladman is concerned that much of the guidance, and in particular, that relating to infrastructure is 'to follow', especially when delivery of this is so central to the strategy of the plan. Given the time which has elapsed since the adoption of the SDP with which the LDP conforms, and the time taken to progress the LDP to this point, we would wish to see more detail on the required SG/PG. Given that the purpose of Supplementary Guidance is to deal with the provision of further information or detail in respect of the policies or proposals set out in the plan, we would question whether the amount of supplementary guidance proposed is appropriate, and perhaps suggests that the plan itself is not sufficient.

# **PLANNING AND DELIVERY STATEMENT**



## **PROPOSED HOUSING ALLOCATION ON LAND AT DYKESIDE FARM, BATHGATE**

**WEST LOTHIAN LOCAL DEVELOPMENT PLAN  
PROPOSED PLAN CONSULTATION**

**NOVEMBER 2015**

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## APPENDICES

- A. Site location plan
- B. West Lothian 2020 Vision document (*Bathgate extract*)
- C. Gladman housing sites delivery record
- D. Indicative masterplan framework
- E. Gladman response to MIR site assessment
- F. Revised SEA housing site assessment
- G. Signalised junction proposed design
- H. West Lothian housing land supply assessment
- I. PAN 2/2010 Effective land supply assessment
- J. Representative site delivery timetable

## 1 Introduction

- 1.1 This statement forms part of a submission to the West Lothian Local Development Plan Proposed Plan (LDP) by Gladman Developments Ltd (Gladman) in support of a proposed residential development of up to 1000 homes on land at Dykeside Farm, Bathgate. A location plan is included in Appendix A.
- 1.2 The land at Dykeside Farm has been promoted for development throughout the LDP preparation process with detailed supporting information submitted to the Council demonstrating the site can deliver a substantial number of much needed new homes in West Lothian without harm to the wider landscape character of the area. Yet with the publication of the proposed LDP, the Council has failed to take the opportunity presented at Dykeside Farm to secure a large housing allocation in a strategic and sustainable location that will add greater certainty and flexibility to the housing supply for West Lothian when faced with a significant shortfall of effective housing land (refer to Section 9 and Appendix H).
- 1.3 On this basis, Gladman objections to the inclusion of Dykeside Farm within the Bathgate Hills Special Landscape Area and subsequently the non-allocation of Dykeside Farm for housing development in the proposed LDP.
- 1.4 This statement and its supporting documents present the case for residential development at Dykeside Farm. The statement supersedes a previous version submitted to the Main Issues Report (MIR) consultation in October 2014.

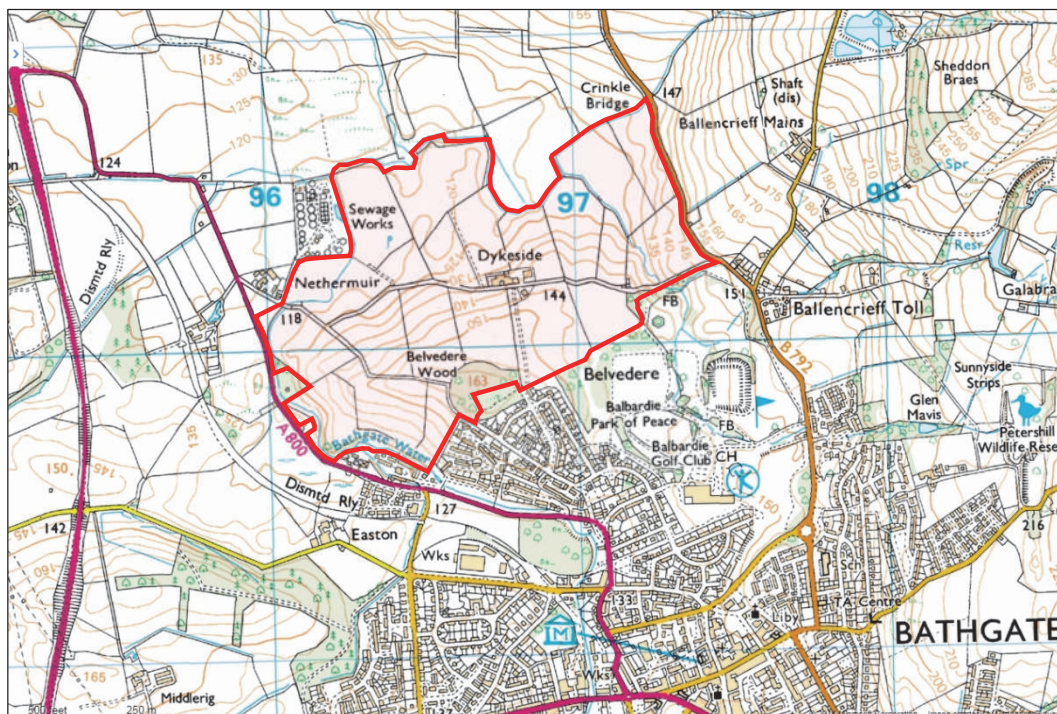
## 2 Planning history

- 2.1 The site was submitted by the owners to the Council's pre-MIR call for sites in early 2011 (ref. EO1-0126). A further detailed submission was made by Gladman on behalf of the owners during the MIR consultation in October 2014 (ref. MIRQ0121) promoting the site for residential development.
- 2.2 A Proposal of Application Notice was submitted to the Council on 28<sup>th</sup> October 2014 to formally begin pre-application consultation proceeding in respect of the development proposal and gain feedback from the community and local stakeholders. As part of this process a public exhibition was held in Bathgate on 4<sup>th</sup> December 2014.
- 2.3 There is no relevant planning history prior to the LDP promotion. The land at Dykeside Farm was however recognised by the Council as the logical direction for Bathgate to expand, acknowledging in their 2020 Vision document (2001) *"the most obvious direction for Bathgate to grow in the longer term is north west (between the Balmuir and Torphichen roads) and safeguarding this corridor from piecemeal development"* (see Appendix B).
- 2.4 Meetings to discuss the site have been held with officers at the Council in planning and transport. Environmental Impact Assessment (EIA) screening and scoping has been carried and the scope of works for an EIA has been agreed with West Lothian Council.

### 3 Site description

3.1 The site is situated to the north of Bathgate immediately adjacent to the settlement boundary. Bathgate is the second largest town in West Lothian in terms of population size and is a popular place for families to live due to the healthy provision of local facilities and services and its strategic location.

3.2 *Site location map*



3.3 The total site area comprises approximately 95 hectares. The site is primarily greenfield agricultural land with the exception of the associated farm building in the centre of the site. The site is bounded by Crinkle Burn to the north, the B792 to the east, Balbardie Park, Belvedere Wood and the Belvedere housing area to the south and the A800 to the west.

3.4 An unnamed farm road runs through the site connecting the B792 with the A800. The site is split into numerous fields by hedgerows, wire fencing and stone walling in some areas.

3.5 The supporting Landscape and Visual Appraisal (LVA) provides a detailed description of the site in a landscape context and assesses the landscape capacity for development.



## 4 Development proposal

- 4.1 This proposal is for a residential development of up to 1000 dwellings, plus all associated infrastructure, including the ability to provide a new primary school on site. The Indicative Masterplan Framework in Appendix D demonstrates how a high quality residential development could be delivered on the site.
- 4.2 The key features of the development proposal can be summarised as follows:
- High quality housing with 25% affordable integrated within the scheme and a mix of house types and sizes.
  - A desirable area in a sustainable location where people want to live and close to local facilities and public transport thereby reducing the need to travel by car.
  - Provision of community facilities to serve the development and a new primary school on site.
  - Pedestrian and cycle links to connect into the existing network of foot and cycle paths.
  - Sensitive development incorporating a high level of open space and retaining key areas of green space to mitigate visual impact.
  - Placemaking/ designing streets design ethos with shared surfaces, new structure landscaping and the retention of existing trees/ boundaries/ dry stone wall on site to create attractive informal public open spaces and street scenes.
  - Retention and enhancement of natural habitats around the existing woodland/tree areas and through the introduction of SUDS ponds.
- 4.3 It is the intention of Gladman to actively promote this site, thoroughly demonstrating effectiveness and viability. A proposal of application notice (PoAN) has been submitted (October 2014), and the scope of works agreed for an EIA following a formal request for a scoping opinion under the Environmental Impact Assessment (Scotland) Regulations 2011.

## 5 Planning policy context

- 8.1 National planning policy recognises that increased house building is key to achieving economic growth and ensuring a sustainable future for Scotland. National Planning Framework 3 (NPF3) paragraph 2.18 states that *“there will be a need to ensure a generous supply of housing land in sustainable places where people want to live, providing enough homes and supporting economic growth.”*
- 8.2 NPF3 calls for short term actions to achieve these long term aims stating that *“In the coming years, [the Scottish Government] wants to see a significant increase in house building to ensure housing requirements are met across the country”.*
- 8.3 NPF3 goes on to promote a partnership approach to overcome constraints that restrict the housing land supply: *“In some of [Scotland’s] city regions, infrastructure capacity constraints are limiting the delivery of new housing and other development. [The Scottish Government] expect to see more concerted efforts – involving planning authorities, developers, government agencies and infrastructure providers – to remove these constraints”.* (Paragraph 2.19)

- 8.4 Scottish Planning Policy (SPP) sets out how planning can help address the challenges facing the housing sector by providing a positive and flexible approach to development. The principal policy mechanisms to ensure this are to: have a generous housing land supply; allocate effective sites; and allocate a range of sites. The allocations chosen to meet the housing requirement should be effective or expected to become effective within the plan period. In the case of LDPs the plan period is 5 years. The effectiveness of a site will be determined against the requirements in PAN 2/2010.
- 8.5 Paragraph 119 emphasises the need for local planning authorities (LPAs) to allocate a range of sites that they are confident can be brought forward for development within the plan period and that will enable the housing supply target to be met. The focus on range highlights that the housing land supply should not only be plentiful and considered effective but also diverse. A range of sites provides flexibility and security from external factors and ensures choice, and essentially delivery, in the market.

## **6 Site assessment**

- 5.1 The site was first represented at the pre-MIR call for sites stage of LDP preparation in 2011 (ref. EO1-0126). The site was then submitted during the MIR consultation in October 2014 (ref. MIRQ0121) with an amended site boundary to reflect an evolving design concept, as illustrated in the accompanying Indicative Masterplan Framework (Appendix D).
- 5.2 The Council's response to the initial site submission is summarised in the Expression of Interest Report which determines the site to be 'not preferred'. Gladman's response to the Council's site assessment is included in Appendix E. Gladman has also prepared a revised site assessment table for the site as per the methodology outlined in the SEA: Environmental Report. The revised site assessment is included in Appendix F.
- 5.3 There is no evidence in the published documents relating to the proposed LDP that the Council has considered any of the supporting documents included in Gladman's comprehensive submission to the MIR which included a Planning and Delivery Statement, Indicative Masterplan Framework and Landscape and Visual Appraisal. These documents provide evidence to refute the Council's initial assessment of the site and therefore Gladman wish to re-present these documents, updated as submitted, for the consideration of the Council and ultimately the examination Reporters for the Scottish Government.

### **Environmental Impact Assessment**

- 5.4 Gladman has confirmed with West Lothian Council that an Environmental Impact Assessment (EIA) will be required as part of any application for planning permission. Gladman has scoped the EIA and agreed the scope of this work with West Lothian Council.

### **Geology and Soils**

- 5.5 Initial desk based investigations have highlighted the following:

- 5.6 Soils, are classified as Class 3.1 and 3.2 on the 1986 Macaulay Land Capability for Agriculture data. However, based on aerial photographs and observations on site, it is also noted that there have been many changes to the area over the years. The site is subjected to wetness limitations, which limit the agricultural potential of the site. Based on site observations and changes since 1986, it is reasonable to conclude that most of the proposed development area actually more closely resembles class 3.2 as opposed to 3.1. Further testing will be undertaken as agreed with the Council to verify this statement.
- 5.7 The superficial deposits on the site comprise a mixture of glacial tills and alluvial deposits comprising clay, silts, sands and gravels, with drift thickness varying between 5 and 15m.
- 5.8 In terms of mining, Brick Clay is recorded below the site, along with clay pits. The site also lies within a Coal Authority “mining report required” area, however there are no recorded mine entries, no recorded shallow coal workings and no probable shallow coal workings shown within the site area. From the initial investigation, there appears no economic prospect of mining coal on site, and very low probability of any unrecorded workings.

### **Ecology**

- 5.9 A phase 1 habitat survey was carried out in April 2013. It is anticipated that this will be repeated in 2015 prior to any application for planning permission in principle, however this phase 1 has helped to inform the further surveys, with recommendations for Badger, Otter, Water Vole, Bat and Breeding Bird Surveys.
- 5.10 Bat surveys have already been undertaken which identified pipistrelle bats commuting and foraging around the farm buildings and a small bat roost was found within one of the farm out-buildings. As this building will not be lost as part of the demolition no license will be required. If there is a requirement to fell any trees as part of the development this would be undertaken from late August to late October.

### **Archaeology**

- 5.11 An initial overview of the site records two sites of cultural heritage interest, being two unroofed buildings of a former farmstead and four cottages. No surface trace survives. There are no scheduled monuments in the vicinity of the site. A desk based assessment will be conducted as part of the proposed EIA. No adverse comments were received from either WOSAS or Historic Scotland in relation to the EIA Scoping, only some guidance for incorporating specific items of work into the assessment.

### **Noise**

- 5.12 To inform the preparation of the indicative masterplan framework, a series of preliminary noise measurements were undertaken on site. These indicated that there is the potential impact on future residents from traffic noise. The EIA scoping report describes in more detail the approach which will be taken to evaluating the potential impact and predicting the significance of the effects and will be updated to take account of the comments received from West Lothian Council.

**Air Quality**

- 5.13 The air quality assessment will be undertaken to a scope as agreed with the Council as part of the EIA.

**Flood Risk Assessment**

- 5.14 It is noted that SEPA flood maps indicate a risk of flooding within corridors of both the Crinkle Burn and Couston Water. As part of the EIA a flood risk assessment will be undertaken, including cross section analysis and hydraulic modelling. For the purpose of developing the initial masterplan framework a significant stand-off from these watercourses was maintained. SUDS will be incorporated into the development to ensure runoff from the site is treated and attenuated to greenfield rates, and therefore ensuring that the risk of flooding downstream is not increased as a result of the development.

**Utilities**

- 5.15 Investigations carried out by Gladman as part of the site assessment have confirmed that gas and electricity can be brought to the site at reasonable cost considering the scale of development.
- 5.16 A pre-development enquiry to Scottish Water has confirmed that a DIA will be required on the foul sewer network. It also notes that the WWTW may not have the available capacity at present to accommodate the development, however a programme would be agreed between the developer and Scottish Water who would be responsible for growth funding this Part 4 Asset. The enquiry also confirmed that a water impact assessment would be required. The WIA has been undertaken on behalf of Gladman, which confirms that a connection can be made to the 12" main at the site boundary with no need for network reinforcements.

**Transportation**

- 5.17 A transportation assessment (TA) has been completed as part of the initial assessment of the site. Throughout the process the Council's Highways Department have been consulted and therefore the scope of the works, the method of assessment and results are all agreed. This has illustrated that one area would require improvement as part of the development, being the signalisation of the Marjoribank Street to Torphichen Street junctions. A proposal, attached in Appendix G is seen as a deliverable solution, which would meet the Council's standards. Access points to the site with junction configurations and sight lines which comply with standards can be established to provide two connection points to the local road network.
- 5.18 It is noted that the site falls outwith the catchment area defined for contributions to the A801 dualling (A801 SPG). However it is also recognised that had the site been under consideration for planning for residential dwellings, then it would have been included in the catchment. The TA notes the trip generation, and there is a defined figure per vehicle trip, thus the contribution to the dualling can be calculated.
- 5.19 It is anticipated that talks with local bus operators may be able to introduce an extension to the existing Bathgate bus loop service through the site.

## **7 Proposed landscape designation**

- 6.1 The land at Dykeside Farm does not currently form part of the Area of Great Landscape Value (AGLV) in the adopted West Lothian Local Plan. However, in the proposed LDP, AGLVs have been replaced with Special Landscape Areas (SLA) and the site at Dykeside Farm is proposed to be incorporated into the SLA boundary.
- 6.2 Gladman objected to this in their submission to the MIR consultation with evidence to support the objection provided in a LVA undertaken by Ian White Associates Landscape Architects (IWA). This evidence does not appear to have been considered by the Council. Gladman maintains the objection in this representation to the proposed LDP.
- 6.3 IWA has undertaken a detailed review of landscape character in this locality through the LVA and the supplementary 'Rebuttal of Proposed Bathgate Hills SLA Boundary Statement'. These submissions highlight that the SLA boundary includes a significant area of low quality landscape whose designation does not meet the selection criteria, does not benefit the definition of a robust SLA boundary and is unnecessary to protect the integrity of the landscape character of the core area (of the SLA). Field study has revealed that the boundary does not reflect distinctive and robust features and that, as acknowledged in other parts of the Bathgate Hills SLA, minor roads provide a more suitable boundary.
- 6.4 The principal characteristics of the Bathgate Hills SLA would not be undermined if the land at Dykeside Farm was rightly excluded from the SLA and made available for development.

## **8 Education infrastructure**

- 7.1 Based on current catchments, the schools relating to the site are Balbardie Primary School, St Mary's Primary School, Bathgate Academy and St Kentigren's Academy. A development of up to 1000 new homes over approximately 10 years will generate the requirement for a number of denominational and non- denominational primary and secondary school pupil places.
- 7.2 Given the duration and density of development it is anticipated a primary school will be delivered on site. Our appraisal supports the construction of a new school as a viable option the cost of which will be borne by the developer(s).
- 7.3 It has been recognised by the Council that current and future development in the Bathgate area will need to be catered for within the school estate. Balbardie Primary School has recently benefitted from an extension to increase capacity. Supplementary Planning Guidance is also in place for developer contributions to extend Bathgate Academy and the denominational secondary school infrastructure to support the development plan strategy in West Lothian.
- 7.4 Through a variety of mechanisms such as developer contributions, phasing and catchment reviews, Gladman will work with the Council to reach a mutually acceptable education solution.

## **9 West Lothian housing shortfall**

- 9.1 SESPlan Housing Land Supplementary Guidance confirms the housing land requirement for West Lothian as 11,420 homes for 2009-2019, and 6590 homes from 2019-2024, plus an additional allowance of 2130 units.
- 9.2 Assessing the housing land supply target in Figure 5 of the proposed LDP, the Council fails to take account of the need for an additional allowance nor does it justify why only the minimum generosity allowance of 10% has been applied to the housing land supply target. Notwithstanding this, even against the lower target the Council acknowledge that it will not meet the housing requirement in the period to 2019 by a significant margin and is effectively 'planning to fail'.
- 9.3 SPP and SESplan requires that a 5 year effective housing supply is maintained at all times. When failing to do so, SESPlan Policy 7 becomes relevant and the Planning Authority is expected to take immediate steps to address the housing land shortfall by releasing additional sites in order to ensure a 5 year effective housing land supply is maintained at all times.
- 9.4 As set out in Appendix H, based on the latest housing land audit (2014) the Council has at best 2.6 years supply of effective housing land. However, the Council continue to rely on committed sites that have historically failed to deliver housing units on the ground.
- 9.5 The opportunity remains for the Council to allocate additional housing land that has potential to deliver new housing in the period up to 2019. Furthermore, additional allocations will add greater flexibility and certainty to the housing land supply to safeguard against future failure. Bathgate is a key settlement within the Strategic Development Area (SDA); recognised as accessible and well placed for investment and growth, yet the LDP proposes no new significant housing land allocations in the town in the period to 2024.
- 9.6 With this considered and in the face of a significant housing shortfall, Gladman propose that land at Dykeside Farm should be allocated for residential development in the LDP as an effective option for delivering significant and very much required housing land in Bathgate.

## **10 Effective housing land supply**

- 10.1 The measure of effective housing land is set out in the Scottish Government's Planning Advice Note (PAN) 2/2010: Affordable Housing and Housing Land Audits. To assess a site as being effective, it must be demonstrated that within five years the site can be developed for housing (i.e. residential units can be completed and available for occupation) and will be free of constraints when considered against seven specific conditions.
- 10.2 Appendix I provides an assessment of the proposal site against the effective land supply criteria presented in PAN 2/2010 and demonstrates that the site would contribute to the effective housing land supply for West Lothian Council.

- 10.3 The proposal is for an economically viable stand-alone development, delivering all requisite infrastructure on a developer funded basis. This has been tested through a development viability appraisal with abnormal/Off site costs totalling £21m allowed to cover provision of new primary school, other school contributions, utilities upgrades, site platforming, new distributor road and other off-site road works. A detailed spreadsheet can be provided on request.
- 10.4 A site delivery timetable is included in Appendix J with representative timescales from submission of an application for planning permission in principle to completion of the development. The timetable demonstrates that the development could be built out over 10 years, starting on site in 2018 and delivering 100 units before 2020. This would make a valuable contribution the Council's effective housing land supply and help address the shortfall in housing and particularly affordable homes, in the short term.
- 10.5 A number of the timescales utilised within the site delivery timetable have been over estimated to account for any unforeseen delays. Based on the high completion rates at Wester Inch village in Bathgate that was built out in recessionary conditions, it is also reasonable to expect that the chosen house builder(s) could achieve a build out rate in excess of 100 dwellings per annum which would bring forward the completion date.

## **11 Gladman track record**

- 11.1 Gladman is one of today's market leaders in the promotion of strategic housing land. Gladman has an excellent relationship with the house building industry. Sites are discussed with house builders before and during the planning process. Planning is progressed thoroughly and expeditiously, no land banking ever takes place.
- 11.2 Land is promoted for housing only in areas where the house builders want to build and people want to live. All site conditions are thoroughly assessed prior to selling the land which leads to clear parameters for selling and buying and for 'oven ready' sites to be offered which enables development to start quickly.
- 11.3 A housing sites delivery record is presented in Appendix C which demonstrates the Company's recent track record. Based on 10 recent examples, the table shows the time taken for the house builder to start on site from the point Gladman secured in principle/outline planning permission. Taking an average from the 10 developments, house building has commenced on site within 14 months of securing the initial in principle/outline planning permission.
- 11.4 Gladman's track record demonstrates the willingness and ability to bring forward land that is effective for housing in the short term.

## 12 Housing demand and marketability

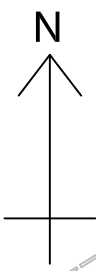
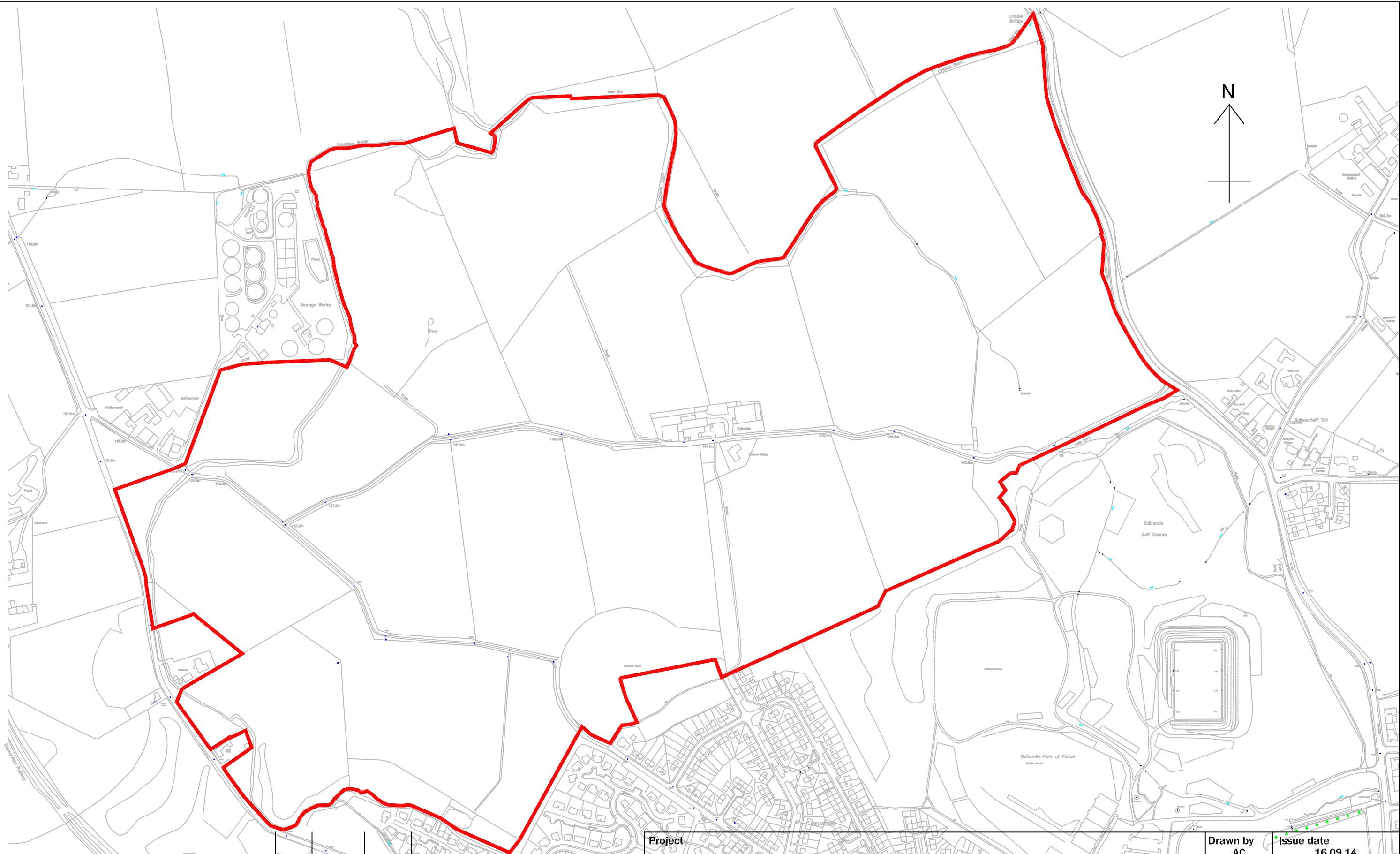
- 12.1 As discussed in section 9 and set out in the housing land supply assessment in Appendix |H, the Council is failing to maintain a five year supply of effective housing land. In order to address this in the short term, the supply of housing land must be market driven; building houses in locations where people want to live. The Council must follow the guidance of national planning policy and work in partnership with developers to ensure a continuing supply of effective land and to deliver housing.
- 12.2 The proposal includes a 25% affordable housing provision. Delivering affordable housing will become increasingly difficult given the constraints on public finances and significant reductions in subsidy levels from the Scottish Government which affects the ability of the Council and its partners to fund new build housing. Consequently the only meaningful way that affordable housing will be delivered is via sites such as the development proposals at Dykeside Farm where sufficient land values will be generated to allow affordable housing from the proceeds of land sales.

## 13 Conclusion

- 13.1 West Lothian Council is failing to maintain an effective five year housing land supply, as required by national planning policy and the Council must therefore act to bring forward additional housing sites in sustainable locations that are deliverable in the short term.
- 13.2 Gladman has a proven track record of bringing forward land that is effective in delivering housing expeditiously. It has been demonstrated that the proposed development site is free from insurmountable constraints, is in a location where there is high demand for housing and meets the tests set on in PAN 2/2010.
- 13.3 Bathgate is a key settlement within the West Lothian SDA; recognised as accessible and well placed for investment and growth, yet the LDP proposes no new significant housing land allocations in the town in the period to 2024. Land at Dykeside Farm provides an attractive, accessible and effective option for the planned growth of Bathgate during the LDP period. This proposal is for an economically viable stand-alone development, delivering all requisite infrastructure on a developer funded basis, meeting key concerns of West Lothian Council.
- 13.4 We would urge West Lothian Council to fully consider this proposal and include the site as a housing allocation in the LDP. The Indicative Masterplan Framework in Appendix D and supporting LVA demonstrate how a high quality residential development is capable of being delivered in this sustainable location without causing harm to the wider landscape.



**APPENDIX A – Site Location Plan**




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Rev	Date	By	Revision notes
*	*	*	*
<b>Status</b>			
<b>PAN</b>			

<b>Project</b>	<b>Dykeside Farm, Bathgate</b>
<b>Title</b>	<b>Site Location Plan</b>

<b>Drawn by</b>	AC	<b>Issue date</b>	16.09.14
<b>Scale(s)</b>	1:5000@A3		
<b>Drawing No</b>	S005-WL03.004		

**APPENDIX B – West Lothian 2020 Vision Document (Bathgate extract)**

## BATHGATE / WHITBURN / ARMADALE / BLACKBURN

This town group is the second-largest urban cluster in West Lothian. It has seen less development pressure and economic success, but is well located in the heart of the Central Belt astride the M8. There is physical scope for expansion around all four towns.

However there are very large allocations already in the Local Plan for Bathgate (2,000 at Wester Inch plus around 200 outstanding at Little Boghead) and for Whitburn (1,500 at Polkemmet with potential for more). At foreseeable rates of build these are likely to satisfy demand until near 2015.

In the redrafted Local Plan it might be worth:

- Placing phasing restrictions on major allocations around Livingston to ensure that a fair share of development benefits accrue to the western towns.
- Indicating a preference for Whitburn to expand in the longer-term by further growth at Polkemmet, especially on reclaimed land.
- Noting that the most obvious direction for Bathgate to grow in the longer-term is north-west (between the Balmuir and Torphichen roads) and safeguarding this corridor from piecemeal development.
- Noting the possibility of a southern bypass to Blackburn on the increasingly congested A705 route, and likewise safeguarding this zone.

The only town in this area where new allocations should be considered is Armadale. Demand is currently healthy, and existing sites may be exhausted in 6 or 7 years. If the constraints of the Barbauchlaw Glen, Black Moss, and Bathgate green gap are observed, three main options emerge:

## APPENDIX C – Gladman Housing Sites Delivery Record

SITE ADDRESS	NUMBER OF DWELLINGS	AFFORDABLE PERCENTAGE	OUTLINE/IN PRINCIPLE PLANNING APPLICATION DETERMINATION DATE	COMMITTEE OR APPEAL DECISION	DATE LAND SOLD	PURCHASER	RESERVED MATTERS/ MATTERS SPECIFIED BY CONDITION DETERMINATION DATE	COMMENCEMENT OF DEVELOPMENT	TIMESCALE FROM INITIAL PLANNING PERMISSION TO SITE START
North Dean Avenue Keighley West Yorks	190	15% (28NO)	12 May 2010	Committee	May 2011	Barratt Homes	May 2011 (submitted in December 2010)	June 2011	13 months
Golden Nook Farm Cuddington Cheshire	150	30% (45NO)	20 Feb 2012	Committee	July 2012	Bovis Homes	August 2012	September 2012 (road & demolition works)	7 months
Henthorn Road Clitheroe Lancashire	270	30% (81NO)	26 March 2012	Committee	December 2012	Barratt Homes & Taylor Wimpey	March 2013	March 2013	12 months
Wigan Road Clayton le Woods Lancashire	300	30% (90NO)	21 July 2011	Committee	December 2012	David Wilson Homes/ Taylor Wimpey	March 2013	May 2013	22 months
Loachbrook Farm Congleton Cheshire	200	30% (60NO)	20 March 2013 (date of High Court Challenge)	High Court Approval	November 2013	Bovis Homes	14 June 2013	November 2013	8 months
Byefield Road Woodford Halse, Daventry	200	30% (60NO)	15 February 2013	Committee	October 2013 (conditional exchange of contracts)	Taylor Wimpey	July 2014	Expected Autumn 2014	21 months
Warmingham Lane Middlewich Cheshire	194	30% (58NO)	9 January 2013	Committee	June 2014	Morris Homes	March 2014	June 2014	17 months
Hannay Road Steventon Oxfordshire	50	40% (20NO)	23 April 2013	Committee	July 2013	David Wilson Homes	May 2014	May 2014	13 months
Queens Drive Nantwich Cheshire	270	30% (81NO)	1 March 2013	Committee	September 2014	Barratt Homes & Bovis Homes	July 2014	September 2014 (programmed start)	18 months
Eliburn Livingston West Lothian	87	15% (13NO)	3 March 2014	Committee	Early 2014 (sale agreed when s.75 signed)	Barratt Homes	June 2014	August 2014	5 months

**APPENDIX D – Indicative Masterplan Framework**



- SITE BOUNDARY
- EXISTING WOODLAND
- PROPOSED WOODLAND
- PROPOSED SPINE ROAD WITH GRASS VERGE / CYCLE PATH AND AVEUE PLANTING
- PROPOSED PUBLIC OPEN SPACE
- POTENTIAL FUTURE DEVELOPMENT SITE
- INDICATIVE HOUSING LAYOUT FOR POTENTIAL FIRST PHASE OF DEVELOPMENT - CIRCA 200 UNITS

AREAS OUTLINED IN BLUE:-

PARCEL A - 2.923 ACRES	APPROX 29 UNITS
PARCEL B - 2.192 ACRES	APPROX 22 UNITS
PARCEL C - 4.895 ACRES	APPROX 49 UNITS
PARCEL D - 5.496 ACRES	APPROX 55 UNITS
PARCEL E - 2.994 ACRES	APPROX 30 UNITS
PARCEL F - 8.413 ACRES	APPROX 84 UNITS
PARCEL G - 3.985 ACRES	APPROX 37 UNITS
PARCEL H - 8.182 ACRES	APPROX 82 UNITS
PARCEL J - 12.276 ACRES	APPROX 123 UNITS
PARCEL K - 6.656 ACRES	APPROX 67 UNITS
PARCEL L - 2.336 ACRES	POTENTIAL COMMERCIAL
PARCEL M - 6.251 ACRES	APPROX 63 UNITS
PARCEL N - 10.577 ACRES	APPROX 106 UNITS
PARCEL P - 4.896 ACRES	POTENTIAL SCHOOL
PARCEL Q - 2.142 ACRES	APPROX 21 UNITS
PARCEL R - 4.226 ACRES	APPROX 42 UNITS
PARCEL S - 4.825 ACRES	APPROX 48 UNITS
PARCEL T - 6.332 ACRES	APPROX 63 UNITS
PARCEL U - 1.192 ACRES	APPROX 12 UNITS
	APPROX 656 UNITS

- BASED ON 10 UNITS PER ACRE
- LINE OF EXISTING HIGH OVERHEAD CABLES
  - AREAS AT RISK OF FLOODING FROM RIVERS
  - AREA OF EXISTING TOPOGRAPHY THAT ARE 1:10 OR LESS
  - POTENTIAL SCHOOL SITE
  - POTENTIAL COMMERCIAL ZONE

- F 01.10.14 TRIMMED PARCELS E & F. OMITTED PLOT U. REALIGNED MAIN ACCESS ROAD AT PARCELS A/B/C. UPDATED SITE BOUNDARY AND UPDATED PARCEL AREAS/UNIT NUMBERS.
- E 31.07.14 BOUNDARY AMENDED
- D 12.12.13 MASTERPLAN UPDATED
- C 02.12.13 MASTERPLAN UPDATED
- B 09.08.13 INDICATIVE UNIT NUMBERS PROVIDED
- A 24.07.13 SHEET SIZE ADJUSTED TO A0

**ema**  
ARCHITECTURE + DESIGN

GLADMAN  
PROPOSED DEVELOPMENT  
DYKESIDE FARM, BATHGATE

MASTERPLAN FRAMEWORK

SCALE 1:25000 @ A0  
DATE 10.07.13  
DRAWN BY KCG/RL  
PROJECT 13030(SK)001 F  
DISCUSSION  
CHARTERED ARCHITECTS  
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## APPENDIX E – Response to MIR Site Assessment

Main Issues Report site assessment	
Council conclusions	Gladman response
<i>Residential and ancillary uses, 500-800 units (site area 62ha)</i>	Gladman is promoting the site for up to 1000 units and the site area now totals approximately 95ha.
<i>Development of the site is not in accordance with the council's preferred development strategy which supports development within the core development areas and other strategic locations. There are other more suitable sites available for development.</i>	<p>This statement conflicts with the spatial strategy of the Strategic Development Plan (SESplan) and the Council's assessment of Bathgate elsewhere in the Main Issues Report.</p> <p>West Lothian is identified as a SDA in the approved SESplan. Bathgate is a key settlement within the SDA, and as recognised on pg. 142 of the Council's Housing Background Paper, "the availability of infrastructure, strategic location and existing facilities makes [Bathgate] an attractive option for development".</p> <p>Despite this, no new major housing sites are proposed for allocation in Bathgate in the Main Issues Report. Considering the above and in the face of a significant housing shortfall, Gladman encourage the Council to reconsider allocating Dykeside Farm for residential development.</p>
<i>Development would constitute an intrusive physical expansion of Bathgate, well beyond the limit of development which is already provided for in the adopted West Lothian Local Plan. It would also be visually and environmentally intrusive.</i>	Land at Dykeside Farm sits on the northern side of the town, outwith any landscape protection designations, and is therefore the logical direction for the town to expand, a position acknowledged by WLC in their 2020 Vision document (2001) "the most obvious direction for Bathgate to grow in the longer term is north west (between the Balmuir and Torphichen roads) and safeguarding this corridor from piecemeal development."
<i>The site also lies within the Bathgate Hills Area of Great Landscape Value (AGLV) and is also within a candidate Special Landscape Area (cSLA).</i>	This statement is incorrect. The site <u>does not</u> lie within the AGLV. Part of the site lies within a cSLA. However, the supporting LVA demonstrates that the principal characteristics of the cSLA would not be undermined if these areas of the site were excluded from the cSLA.
<i>There is insufficient infrastructure available to support development of this site.</i>	The proposal is for an economically viable stand-alone development, delivering all requisite infrastructure on a developer funded basis, meeting key concerns of West Lothian Council.
<i>The site is remote from main facilities and as such is not considered as a sustainable location for development.</i>	<p>The site lies directly adjacent to the existing settlement boundary and there are number of access points that could be utilised to create permeability between the development and the surrounding area.</p> <p>The scale of the development proposal will create an opportunity for additional facilities to be incorporated into the development to serve future residents and the local area.</p>
<i>Development would result in a substantial loss of prime quality agricultural land.</i>	<p>West Lothian benefits from substantial areas of prime quality agricultural land around its towns and villages and therefore the growth of settlements to provide additional housing land to meet demand will inevitably involve building on some areas of prime land.</p> <p>Soils at Dykeside Farm are classified as Class 3.1 and 3.2 on the 1986 Macaulay Land Capability for Agriculture data. However, based on site observations and changes since 1986, it is reasonable to conclude that most of the proposed development area actually more closely resembles class 3.2 as opposed to 3.1. Further soil testing will be undertaken prior to the submission of a planning application.</p>



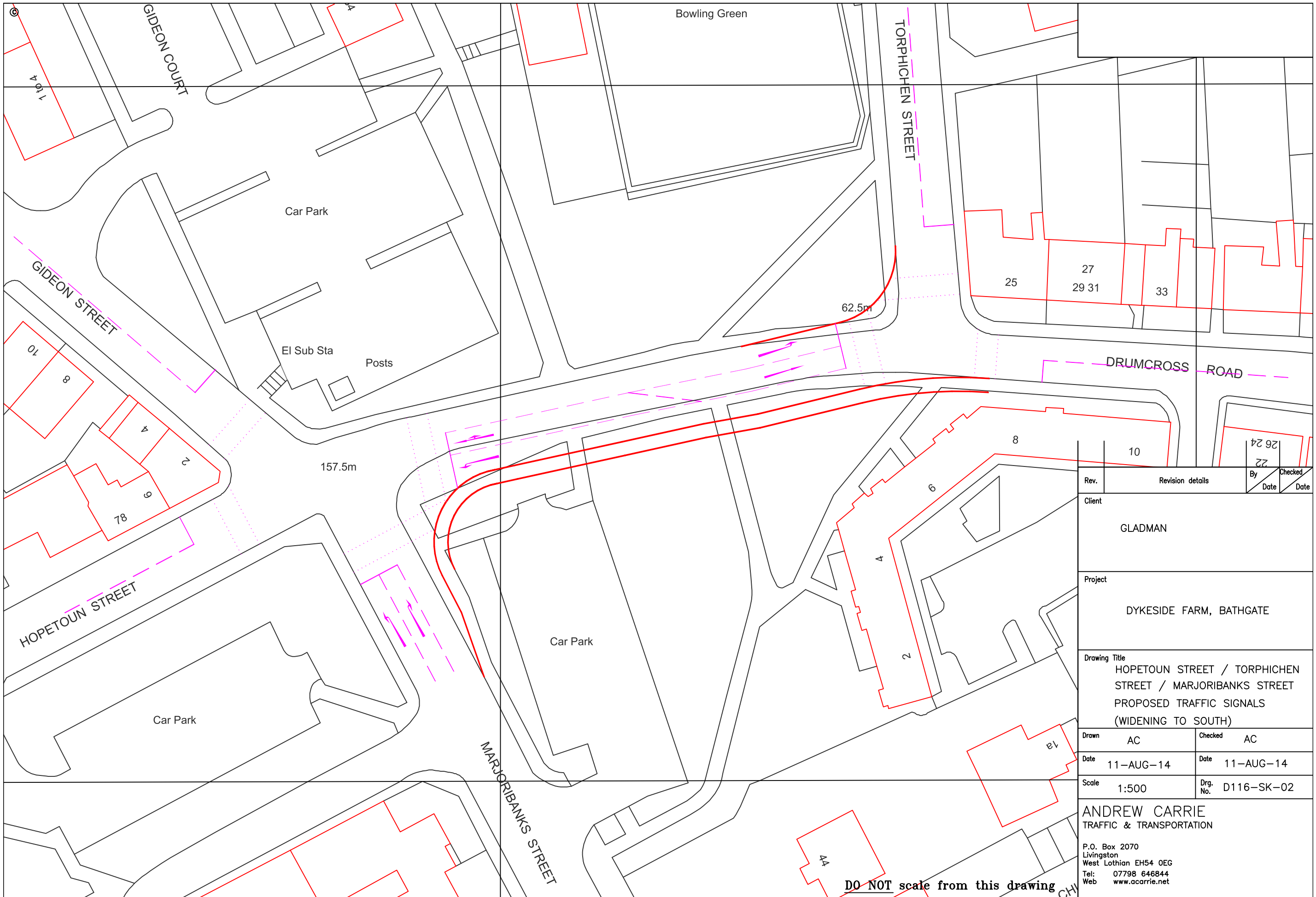
## APPENDIX F – Revised SEA Housing Site Assessment

Proposed use – Residential and ancillary uses (62ha 95ha) WLLP reference – Countryside WLLDP reference – EOI-0126	
CONDITION & SETTING	General comments
Present use	Greenfield, farm buildings in centre of site of traditional and modern construction.
Slop and Shape	Irregular shaped site which undulates throughout
Altitude and Exposure	Exposed site sits lower than surroundings with open views westwards over Bathgate and beyond. Ground rises up towards Torphichen Road
Un-neighbourly/non-conforming uses	Sewage works outwith site at northwest corner
Relationship to Townscape	Part of site on settlement edge (south west edge) – <i>Balbardie Park is safeguarded open space and falls within the settlement boundary. The site is therefore directly adjacent to the settlement edge.</i>
Landscape Fit – Intervisibility	Site sits at lower level from Torphichen Road which screens the site from view, views more open when looking into site from the west, north and south.
Landscape Fit - Skyline	<i>Development would likely be visually prominent – A LVA has been carried which concludes that although the proposal will result in change to the landscape and to the visual environment, with appropriate standards of modern streetlighting, detailed design of placemaking, and attention to the sensitive integration of new road junctions onto existing roads, the development proposal has the potential to create new residential neighbourhoods within a strong landscape framework that establishes a robust edge to the settlement, defined along the line of the Couston and Bathgate Burns. Effective separation of Bathgate from Torphichen would be maintained, and the setting of the latter village not compromised.</i>
Defined Boundary	On all sides formed by a mix of fences, woodland paths and stone dykes – <i>and watercourses.</i>
On Site Constraints	Sewage works outwith site at northwest corner. Gas Feeder No.10 pipeline across northern part of site – 250 metre pipeline consultation zone; UKT pipeline.
Ground Conditions/ Natural Features	Belvedere Wood at southern boundary, trees along remainder of southern boundary.
Trees	Belvedere Wood listed in Open Space Strategy as natural/semi natural greenspace - woodland
Protected Species (biodiversity)	None apparent but likely to exist
Green Network (CSGN)	N/A
Access/ Parking/ Roads	Core Path Plan route 20 runs east to west alongside by Dykeside and north south to Belvedere Wood. – <i>Suitable access can be taken from the B792 and A800.</i>
Watercourse within vicinity (potential flood risk)	Drainage channels across site north/south and east/west. River corridor through the site is on SEPA flood maps. South east corner of site is within a waste water drainage hotspot (Ballencrieff).
Other	School catchments - Torphichen, St Mary's, Bathgate, St Kentigern's Archaeology points – Barns Farmstead Old clay pit (Dykeside Farm) to west of site Phase 1 Habitat Survey 1993 site to west – grassland Planning history – OPP for house south at Oakwood Cottage, granted March 1994 (0073/P/94), erection of a house (505/95) granted August 1995; OPP refused at Dykeside for demolition of shed and erection of house November 95 (1065/P/95) – <i>a proposal of application notice was submitted in October 2014.</i>
<b>Conclusion/Summary: Site potential and impact on the community and/or settlement.</b>	<i>Attractive rural landscape undulating throughout and providing open views across to the west and north in particular. Development likely to be highly visually intrusive, remote from main facilities. Potential access issues onto Torphichen Road. – Land at Dykeside Farm sits on the northern side of the town, outwith any landscape protection designations, and is therefore the logical direction for the town to expand. The site lies directly adjacent to the existing settlement boundary and there are number of access points that could be utilised to create permeability between the development and the surrounding area.</i>

### Does the proposal / Allocation.....

SEA Topic	Air		Biodiversity		Climate Factors		Cultural Heritage				Landscape & Townscape		Material Assets		Population & Health		Soil		Water				
	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?	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)?
<b>Assessment</b>																							
Dykeside Farm, Bathgate (EOI-0126)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	X	✓	✓	/	X	✓	✓	✓	✓	✓

**APPENDIX G – Signalised Junction Proposed Design**



**DO NOT scale from this drawing**

Rev.	Revision details	By	Checked
		Date	Date

Client  
GLADMAN

Project  
DYKESIDE FARM, BATHGATE

Drawing Title  
HOPETOUN STREET / TORPHICHEN STREET / MARJORIBANKS STREET  
PROPOSED TRAFFIC SIGNALS  
(WIDENING TO SOUTH)

Drawn	AC	Checked	AC
Date	11-AUG-14	Date	11-AUG-14
Scale	1:500	Drg. No.	D116-SK-02

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## APPENDIX H – West Lothian Housing Land Supply Assessment

Description		Figure	Figure	Figure	Calculation
<b>West Lothian Housing Land Supply</b>		No generosity applied	with SPP \$116 10% generosity	with SPP \$116 20% generosity	
Housing requirement <i>Source: SESplan SG Housing Land Period: 2009-2019</i>	(a)	11,420	12,562	13,704	
Length of plan	(b)	10	10	10	
Annual housing requirement	(c)	1142	1256	1370	$= a \div b$
Completed plan years	(d)	5	5	5	
Total housing completions in plan period	(e)	2,428	2,428	2,428	
Net residual housing requirement	(f)	8,992	10,134	11,276	$= a - e$
Years remaining	(g)	5	5	5	$= b - d$
Net revised annual completion rate	(h)	1,798	2,027	2,255	$= f \div g$
5 year requirement adjusted against delivery	(i)	8992	10134	11276	$= h \times 5$
Effective housing land supply (HLA 2014)	(j)	4791	4791	4791	
<b>Number of years supply</b>	(k)	<b>2.66</b>	<b>2.36</b>	<b>2.12</b>	$= i \div g$
<b>Percentage of 5 year requirement</b>	(l)	<b>53%</b>	<b>47%</b>	<b>42%</b>	

## APPENDIX I – PAN 2/2010 Effective Land Supply Assessment

<b>SCOTTISH GOVERNMENT PLANNING ADVICE NOTE 2/2010</b>	
<b>Effective Land Supply Criteria</b>	<b>Compliance</b>
<p><b>OWNERSHIP:</b> <i>The site is in the ownership or control of a party which can be expected to develop it or to release it for development. Where a site is in the ownership of a local authority or other public body, it should be included only where it is part of a program of land disposal.</i></p>	<p><b>Yes</b> - The land is within the ownership of a party that would be in a position to release the site for development on securing a relevant planning permission.</p>
<p><b>PHYSICAL:</b> <i>The site, or relevant part of it, is free from constraints related to slope, aspect, flood risk, ground stability or vehicular access which would preclude its development. Where there is a solid commitment to removing the constraints in time to allow development in the period under consideration, or the market is strong enough to fund the remedial work required, the site should be included in the effective land supply.</i></p>	<p><b>Yes</b> – The site is free from physical constraints that would preclude development and can be accessed from the B792 and A800. A preliminary development framework has been prepared demonstrating how a housing site could feasibly be delivered.</p>
<p><b>CONTAMINATION:</b> <i>Previous use has not resulted in contamination of the site or, if it has, commitments have been made which would allow it to be developed to provide marketable housing.</i></p>	<p><b>Yes</b> – There are no known contamination issues which would mean this site is undevelopable.</p>
<p><b>DEFICIT FUNDING:</b> <i>Any public funding required to make residential development economically viable is committed by the public bodies concerned.</i></p>	<p><b>Yes</b> - No public funding would be required to make the residential development economically viable.</p>
<p><b>MARKETABILITY:</b> <i>The site, or a relevant part of it, can be developed in the period under consideration.</i></p>	<p><b>Yes</b> - There is known demand to build additional housing in West Lothian and in particular this area.</p>
<p><b>INFRASTRUCTURE:</b> <i>The site is either free of infrastructure constraints, or any required infrastructure can be provided realistically by the developer or another party to allow development.</i></p>	<p><b>Yes</b> - There are no known infrastructure requirements which would mean this site is undevelopable. A viability appraisal has confirmed that required infrastructure can be provided realistically by the developer.</p>
<p><b>LAND USE:</b> <i>Housing is the sole preferred use of the land in planning terms, or if housing is one of a range of possible uses other factors such as ownership and marketability point to housing being a realistic option.</i></p>	<p><b>Yes</b> - The sustainability and marketability of the site make it a realistic and logical site for housing.</p>

**APPENDIX J – Representative Site Delivery Timetable**

Task	Duration (months)	Q1 - 2016	Q2 - 2016	Q3 - 2016	Q4 - 2016	Q1 - 2017	Q2 - 2017	Q3 - 2017	Q4 - 2017	2018	2019	2020-24	2025+
PPP application submitted and determined	4-6			█	█								
Section 75 agreement negotiated and signed	1-3					█							
Site marketed and land sold to house builder(s)	3-6					█	█						
RCC application submitted and determined	6-12					█	█	█					
Site investigation, utilities and drainage approval	6-12					█	█	█					
MSC application submitted and determined	3-6							█	█				
50 units completed (cumulative total 50/1000)	12									█			
50 units completed (cumulative total 100/1000)	12										█		
500 units completed (cumulative total 700/1000)	60											█	
400 units completed (cumulative total 1000/1000)	36-48												█



# Rebuttal of Proposed Bathgate Hills SLA Boundary

November 2015



Rebuttal of Proposed Bathgate Hills Special Landscape Area Boundary

Gladman Developments.

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November 2015

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## Introduction

Designation of the northern flank of Belvedere and the adjoining slope of Ballencrieff Mains within the Bathgate Hills Special Landscape Area draws attention to a local inconsistency in the process of landscape character classification, qualitative appraisal and designation.

The West Lothian Landscape Character Classification (August 2014) consolidated the landscape characterisation from the Lothians Landscape Character Assessment (1998) and the Landscape Capacity Study for Wind Energy Development in West Lothian (2011). As stated in the Introduction to the 2014 report, "To be clear, Landscape Character Areas or Units are not local landscape designations; they cover the entire district whilst designations cover only specific, delineated areas of merit which may comprise several landscape character types and areas."

The West Lothian Local Landscape Designation Review (2013) by LUC (WLLDR) took the Landscape Character Areas from the 2011 study as the basis for the consideration of potential Special Landscape Areas (SLAs). Using a rigorous methodology of landscape evaluation, qualitative appraisal and the designation of defined areas, this review resulted in the SLA boundaries in the Draft Local Development Plan.

Dykeside Farm lies within a SLA that is defined by a Landscape Character Classification, the boundaries of which are strategic in nature and require interpretation at the local scale (as noted in the 2011 report). The SLA boundary has been defined outwards from the LCA boundary without detailed consideration of where the LCA boundary itself should lie. This is significant given the juxtaposition at this location of two landscape character areas of very different quality.

A detailed review of landscape character in this locality suggests that the SLA boundary includes a significant area of low quality landscape whose designation does not meet the selection criteria, does not benefit the definition of a robust SLA boundary and is unnecessary to protect the integrity of the landscape character of the core area (of the SLA).



## Landscape Character

The West Lothian Landscape Character Classification (WLLCC) identifies that the western fringe of the Bathgate Hills LCA occurs on an undulating line between Bathgate and Torphichen, astride the B792. The Bathgate Hills LCA here meets the Couston Valley LCA, a landscape of considerable contrast to it; the characterisation of these neighbouring landscape units is described in the WLLCC, as follows :

Landscape Character Type	Lowland Hills & Valleys	Broad Valley Lowlands
Landscape Unit	5 – Bathgate Hills	7 – Couston Valley
<b>Key</b>	<ul style="list-style-type: none"> <li>• Complex, rounded, glaciated and prominent range of igneous hills and craggy outcrops with distinctive 'crag and tail' skylines rising above the lowland landscape</li> <li>• Interlocking groups of dolerite sills forming hills varying between 200m-300m AOD</li> <li>• Narrow band of Carboniferous limestone adds further to the complex topography and land cover</li> <li>• Evidence of past quarrying for the hard rock, limestone, lead, silver, coal and oilshale</li> <li>• Lower slopes are smoother, contrasting with the more rugged broken higher ground</li> <li>• Frequent minor burns create locally incised valleys draining westwards to the River Avon</li> <li>• Open water at several reservoirs.</li> <li>• Bold, relatively pastoral or mixed, small scale and intimate farmed lowland hill landscape with post and wire fences, gappy hedges and broken lines of oak, ash and beech</li> <li>• Predominantly improved grassland with rough pasture and heather; in spring the hills are ablaze with yellow gorse which thrives on the thin stony dolerite soil</li> <li>• Linear tree belts and occasional stone dykes on higher steeper slopes add to the intricate pattern of landform, land use and land cover</li> <li>• Largely unaffected by afforestation but coniferous woodland very prominent on hill tops, especially Beecraigs Country Park</li> <li>• Distinctive lines of mixed shelterbelts, trees often shaped by the wind</li> <li>• Area rich in ancient archaeological artefacts of significant historical / heritage interest</li> <li>• Winding minor roads and tracks link scattered farmsteads, small settlements and isolated mansion houses on the lower slopes</li> <li>• Strong sense of place due to remoteness, wildness &amp; stillness of the high ground, and huge skies, wide horizons and infinite complexity of distant unobstructed views</li> <li>• An important, frequently visited, recreational resource either for peaceful enjoyment of the countryside or a range of activities at Beecraigs Country Park</li> <li>• Telecommunications mast on the highest ground is a visible landmark feature</li> <li>• Extensive views out from several notable viewpoints within the hills, such as The Knock and Cockleroy, and to the hills from several kilometres beyond them</li> </ul>	<p>Key Characteristics of the LCT :</p> <ul style="list-style-type: none"> <li>• Open, broad relatively flat lowland plain within a gently undulating valley landform formed of folded sedimentary rocks of Carboniferous age, holding significant oil shale and coal measures with sand and gravel below alluvial river valleys</li> <li>• Inconspicuous rivers and smaller tributary burns create shallow undulations with gentle side slopes</li> <li>• Pastoral landscape of medium to large scale fields, predominantly improved grassland for sheep grazing</li> <li>• Weak field pattern with field boundaries poorly defined by post and wire fences and gappy hedges with occasional hedgerow trees</li> <li>• Poor quality arable land on the margins provides landscape variety</li> <li>• Occasional woodland provides local enclosure</li> <li>• Long distance views out to higher ground</li> <li>• Few noticeable landform features</li> <li>• Distinctive rural character but with significant man-made modifications and intrusions harking back to the area's industrial heritage</li> <li>• Major transport corridors throughout the LCT due to the advantageous topography</li> </ul> <p>Key Characteristics of the Landscape Unit :</p> <ul style="list-style-type: none"> <li>• Broad, open, medium scale valley of the Couston Water which gradually</li> <li>• falls north-westwards from the Bathgate Hills to the River Avon</li> <li>• Almost exclusively pastoral with small areas of arable farmland</li> <li>• Few isolated farms</li> <li>• Generally featureless, with little tree cover and few hedges</li> <li>• Roadside planting alongside the A800 and A801 is a feature in the landscape</li> <li>• Small areas of semi-improved acidic and neutral grassland, for example around South Couston Farm, for sheep grazing</li> <li>• Open water and former workings at Couston sand quarry are a major intrusion in the landscape, currently being restored</li> <li>• Clear views eastwards to the steep western edge of the Bathgate Hills, and westwards to the more gradually rising Blackridge Heights</li> </ul>

## Landscape Designation

The methodology described in WLLDR for determining landscape designations follows a rigorous approach with a transparent structure for decision-making. The initial stage uses the Landscape Character Assessment (WL-LCA 2011, which is now superseded by WL-LCA 2014 but without any significant change). A quantitative evaluation of the landscape is then undertaken, using a set of criteria, to arrive at a ranking of Landscape units. The top third of ranked landscape units were automatically taken forward to form the “core areas” for SLAs. The middle third of ranked landscape units were reviewed in more detail to establish whether parts were of suitable quality to join a neighbouring SLA or to form a “core area in its own right”. The lower third were discarded from further consideration.

In this regard, the Bathgate Hills Landscape Unit ranked second highest of all 23, whilst the Couston Valley Landscape Unit ranked lowest of all (with only half of the aggregate score of the top-ranked landscape unit). Such a stark contrast in quality suggests that the line of boundary between the two landscape units should be readily apparent in the field and marked by a distinct, steep gradient in quality.

The method of qualitative analysis acknowledges (at paragraph 2.39) that :

- Landscape Character Areas are not focussed on landscape quality
- Significant variations in landscape quality can occur across the landscape units

The 2011 report comments upon the selection of boundaries for Landscape Character Types and Units, explaining that “It is important to note that at the strategic scale of the study, the boundaries of Landscape Character Types and Units are not precisely drawn....detailed assessment will be required in order to define precise boundaries”.

## Definition of SLA Boundaries

The production of SLA boundaries should take into account the practical criteria recommended in the SNH Guidance on Local Landscape Designations :

- “ what clear and permanent feature which best encompass the proposed area can be tangibly identified on the ground?
- how important are views from and into the selected areas?

In most circumstances, both desk-based studies and field survey will be required to determine the best boundary features for any particular area. The precise choice of boundary feature will be determined by the options available and the best fit these have with the reasons for which the area is being designated. While it is not therefore possible to be prescriptive, features which may make effective boundaries include topography, watersheds and rivers. Other physical features such as field boundaries and roads could also be considered.

Particular challenges also arise in selecting boundaries close to, or within the envelope of, settlements and larger urban areas. In these circumstances, small areas of lower merit may need to be included within the local landscape designation where this allows for a better physical boundary to be used, or to provide for more effective protection and management of the landscape in the longer term. Equally, in establishing boundaries consideration should also be given to the prospect of future growth of settlements close to or within locally designated landscapes. As noted above, in and around the larger settlements and urban areas, local landscape designations may also overlap with or lie within designated green belt. In considering the boundary of these local landscape designations, care should be taken to differentiate clearly between the separate functions of these two designations.”

The 2011 report comments upon the selection of boundaries for Landscape Character Types and Units, explaining that “It is important to note that at the strategic scale of the study, the boundaries of Landscape Character Types and Units are not precisely drawn....detailed assessment will be required in order to define precise boundaries”.

The boundary between the Bathgate Hills and Couston Valley Landscape Units proposed in the 2011 report is reproduced without modification in the WLLDR 2013 and the WL-LCA 2014. The WLLDR then considers in more detail how the boundaries of the SLA are defined; it does not consider in more detail the boundary of the landscape character unit itself. The brief for the WLLDR (at page 3 of the report) requires the boundaries of SLAs to have “defensible topographic, built or other clear lines”. The methodology described in the WLLDR approach follows best practice as recommended in the SNH Guidance on Local Landscape Designations; boundaries were subject to detailed study and were drawn, where possible, along identifiable features in the landscape such as roads, railways, field

boundaries, streams and ridge lines. Where there is a lack of obvious features, the approach has been to move the boundary outwards and include areas of lower merit, rather than to move inwards and reduce the area of higher merit landscape included, particularly where this has an impact on the integrity of the core area.

Considering in detail the boundary of the SLA at Dykeside, the pertinent questions to answer are :

- Does the proposed SLA boundary as drawn lie on an identifiable, defensible feature?
- Does this boundary reflect accurately the boundary of the identified 'Core Area' of the SLA designation methodology, or has it been extended outwards?
- If it has been extended outwards, does an identifiable boundary feature exist that more closely matches the extent of area meeting criteria for designation?
- Would moving the boundary inwards from the current line reduce the area of higher merit landscape or impact on the integrity of the core area?
- Does the boundary as drawn include areas of lower merit, and if so do these allow for a better physical boundary to be used or provide for more effective protection and management of the landscape in the longer term?

I. Does the proposed SLA boundary as drawn lie on an identifiable, defensible feature?

The boundary north of Bathgate lies along the A800 and Bathgate Water out to Nethermuir, where it picks up the Dykeside Farm lane eastwards before striking out northwards across the Couston valley following field boundaries, the Couston Water itself, and then further field boundaries up to meet The Craigs woodland south of Torphichen. The field boundaries are in many cases weakly defined.



2. Does this boundary reflect accurately the boundary of the identified 'Core Area' of the SLA?

The SLA is defined by the Bathgate Hills Landscape Character Unit. The adjoining Couston Valley LCA scored at the bottom of the scale for designation criteria, thus is acknowledged to be a landscape of low quality and no part of it was considered relevant to the SLA designation. The transition between these two landscape character areas will be a zone of steeply rising landscape quality and the SLA boundary should encompass the area of higher merit. The LCA boundary is strategic in nature and requires interpretation at a local detailed level in order to define a robust and defensible boundary.

The Bathgate Hills LCA is defined primarily by topography. Analysis of the local topography suggests that the break of slope at which point the Couston Valley runs up against a marked steepening at the toe of the surrounding hills occurs generally to the east of the SLA boundary. Belvedere hill itself forms an outlier to this general line of slope; the head of the Couston Water in Balbardie Park forms a saddle in which the housing of Ballencrieff lies and through which Bathgate is visible on approach along the Torphichen Road (B792). The characteristic elements of the Bathgate Hills LCA are largely absent from this outlier, which shares many elements with the Couston Valley LCA (Inconspicuous tributary burns create shallow undulations with gentle side slopes in a pastoral landscape of medium to large scale fields (predominantly improved grassland for sheep grazing), weak field pattern with field boundaries poorly defined by post and wire fences and gappy hedges with occasional hedgerow trees).

The boundary of the SLA lies beyond the identified 'Core Area' of the SLA.



3. If it has been extended outwards, does an identifiable boundary feature exist that more closely matches the extent of area meeting criteria for designation?

A line that follows the B792 (a feature strongly defined by stone walls, hedges and roadside trees) and then field boundaries north to Torphichen would more closely matches the boundary of the area meeting SLA designation criteria. It would enclose less of the poor quality Couston Valley LCA of which no part was identified as meeting selection criteria.



4. Would moving the boundary inwards from the current line reduce the area of higher merit landscape or impact on the integrity of the core area?

Moving the boundary eastwards as far as the Torphichen Road would not reduce the area of higher merit landscape within the SLA nor impact on the integrity of the core area of the Bathgate Hills LCA. The relinquished area is transitional between the Couston Valley and the Bathgate Hills character areas and cannot be considered to be representative of the Bathgate Hills LCA in general.



The Torphichen Road (B792) forms a well defined feature along the foot of the Bathgate Hills





5. Does the boundary as drawn include areas of lower merit, and if so do these allow for a better physical boundary to be used or provide for more effective protection and management of the landscape in the longer term?

The boundary of the SLA includes substantial parts of the Couston Valley LCA, identified through the quantitative evaluation as being of the lowest quality and ineligible for designation. The physical boundaries used for the SLA are present on the ground but weak as physical landscape features.



The open and weakly patterned slopes of the Couston valley contrast with the strong pattern of the slopes of the Bathgate Hills east of the Torphichen Road



The Bathgate Hills LCA rises beyond Ballencrieff, seen from Hillhouse

## Conclusion

The landscape character evident on the northern flank of Belvedere is transitional between that of the Clouston Valley and that of the Bathgate Hills; at the strategic scale at which the WLLCC was undertaken, the boundary between these LCAs could be drawn on a different line that would still meet the LCA criteria. Detailed local consideration is required.

The weakness of the field pattern, softening of topography, and location as an outlying knoll feature separated by urban form from the main body of the Bathgate Hills suggest that Dykeside is not part of the 'Core Area' of the LCA suitable for designation as an SLA. It lacks coherence with the character of the core area.

The SLA boundary has been defined by working outwards from the LCA boundary, without detailed consideration of where the LCA boundary itself should lie. This is significant given the juxtaposition at this location of two landscape character areas of very different quality; the Clouston Valley LCA does not meet the criteria for inclusion in the SLA designation.

A detailed review of landscape character in this locality suggests that the SLA boundary includes a significant area of low quality landscape whose designation does not meet the selection criteria, does not benefit the definition of a robust SLA boundary and is unnecessary to protect the integrity of the landscape character of the core area (of the SLA). Field study has revealed that the boundary does not reflect distinctive and robust features and that, as acknowledged in other parts of the Bathgate Hills SLA, minor roads (in this case the B792) provide a more suitable and legible boundary.

## References

West Lothian Landscape Character Classification. August 2014. *West Lothian Council*. (WLLCC)

West Lothian Local Landscape Designation Review. June 2013. *LUC*. (WLLDR)

Landscape Capacity Study for Wind Energy Development in West Lothian. December 2011. *David Tyldesley & Associates; West Lothian Council and Scottish Natural Heritage*

Guidance on Local Landscape Designations. *Scottish Natural Heritage*

**Residential Development at Dykeside Farm, Bathgate**  
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Residential Development at Dykeside Farm, Bathgate

Landscape & Visual Appraisal

This report by Ian White Associates Landscape Architects is issued to accompany the proposal submitted by Gladman Developments for new housing at Dykeside, Bathgate, West Lothian.

Author : Nick Bowen CMLI  
Date: October 2014

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# 1.0 EXECUTIVE SUMMARY

## 1.0 EXECUTIVE SUMMARY

### 1.1 Landscape and Visual Impacts of the proposal

The proposal to develop land at Dykeside, immediately north of Bathgate, will result in change to the landscape and to the visual environment. The extent to which such predicted changes will result in significant impacts has been appraised.

Significant adverse impacts have been identified, as follows :

- Part of the candidate Special Landscape Area (SLA) defined as the Bathgate Hills SLA will be lost to housing development, causing an impact of **moderate significance**. The impact has not been considered as major significance because the area of SLA lost is not typical of the SLA character description, is an outlier and is not intrinsic to protecting the character and quality of the SLA.
- The setting of the Area of Great Landscape Value (AGLV) will locally alter, causing an impact of **minor significance** to the AGLV.
- Residents of the houses that currently look onto the site will experience a visual impact of **moderate significance**.
- Users of the local core paths and other paths will experience a visual impact of **moderate significance**.
- Residents, path and road users in the wider area to north and west of the site will experience a visual impact of **minor significance**.

The development proposed would continue the expansion of Bathgate north-westwards along the Bathgate Burn and the B972 Torphichen Road. Parts of the site have been identified within the West Lothian Landscape Designation Review as being in the Couston Valley landscape unit, assessed as of lowest quality against the criteria for designation. The upper part of the site crosses into the Bathgate Hills landscape unit which is assessed as of highest quality in the criteria for designation; however this part of the unit already contains residential areas and has an urban fringe character in the context of which the proposed development would not be inconsistent.

The proposed masterplan takes cognisance of the sensitivity of the upper slopes of Belvedere hill and of Belvedere Wood itself, keeping development areas back from this part of the site. The proposed masterplan has a framework of significant woodland belts that will visually contain and subdivide the built areas. A network of open habitat along the burn corridor and extending onto the lowest parts of the site will enhance the riparian habitats. New paths will connect with and extend the existing path network. The proposed riparian habitat corridor will better integrate the existing sewage works and neighbouring industrial/storage site into its setting.

With appropriate standards of modern streetlighting, detailed design of placemaking, and attention to the sensitive integration of new road junctions onto existing roads, the development proposal has the potential to create new residential neighbourhoods within a strong landscape framework that establishes a robust edge to the settlement, defined along the line of the Couston and Bathgate Burns. Effective separation of Bathgate from Torphichen would be maintained, and the setting of the latter village not compromised.

# 2.0 INTRODUCTION

## 2.0 INTRODUCTION

### 2.1 Brief

This Landscape and Visual Appraisal has been undertaken to establish the landscape and visual characteristics of the site and locality, assess the capacity of the landscape to accommodate proposed residential development, and identify the landscape and visual effects that would result from development in the form proposed.

### 2.2 Methodology

The methodology has been guided by the *Guidelines for Landscape and Visual Impact Assessment, Third Edition, 2012*; published jointly by the Landscape Institute and the Institute of Environmental Management and Assessment.

The process of appraisal has been :

- Baseline study - Review of the The West Lothian Landscape Character Classification (August 2014; West Lothian Council), the Lothians Landscape Character Assessment (No. 91, 1998; Ash Consulting Group/ SNH) and The West Lothian Landscape Designation Review (2013; LUC)
- Baseline study - Desk-based study of topography, land cover, geology, soils and drainage pattern.
- Baseline study - Field assessment to establish the existing landscape character and visual qualities within the broader context.
- Identification and description of predicted landscape and visual effects
- Appraisal of effects - Field appraisal of the proposed residential allocation, to establish the visual envelope, sensitive features, receptors, and the significance of predicted landscape and visual effects
- Consideration of proposals for mitigation of the identified effects

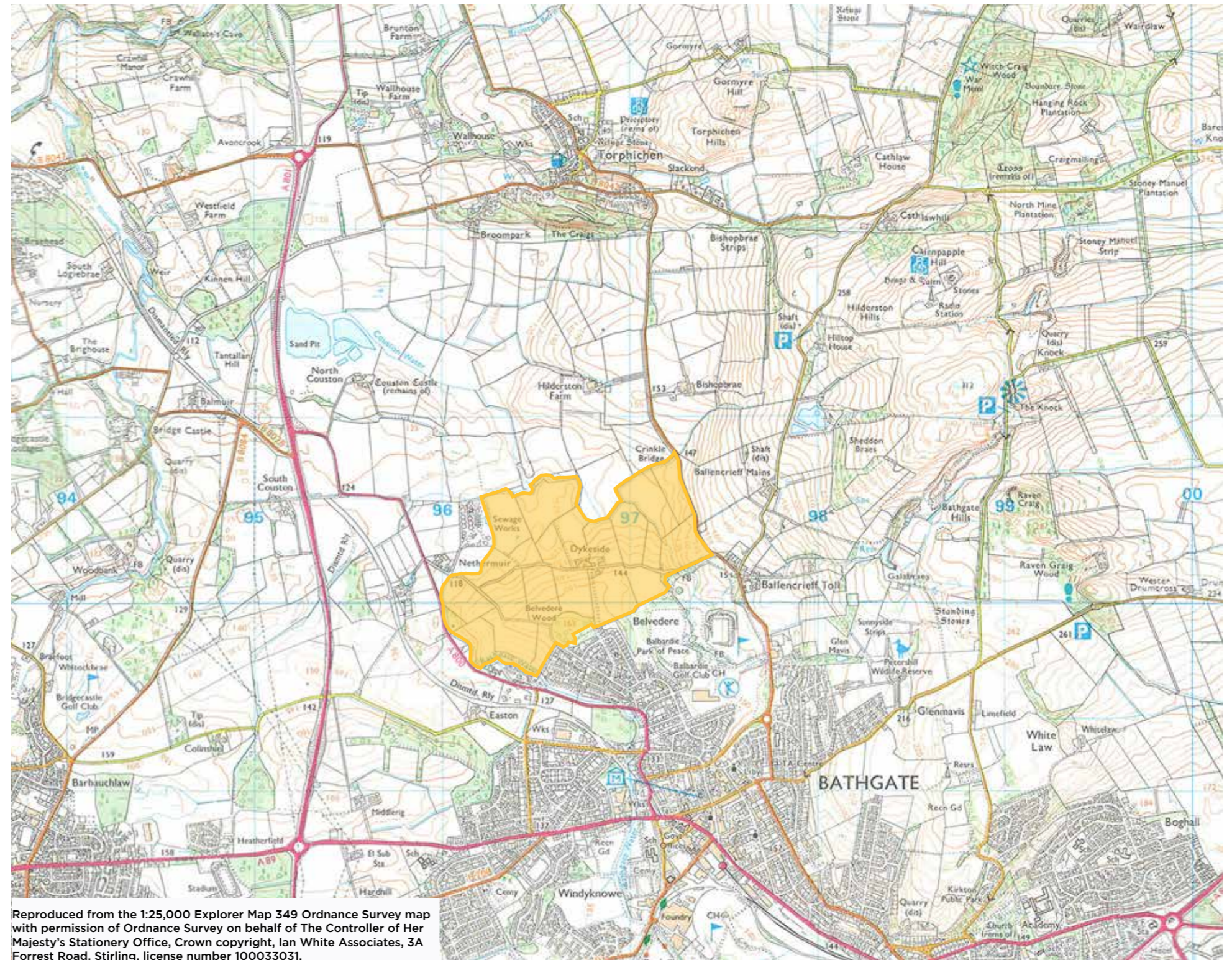
This report is a landscape appraisal, not a full Landscape and Visual Impact Assessment. Whilst it follows the principles and processes of LVIA, it is presented in a more concise form appropriate for the early consideration of landscape and visual impacts in the site selection process.

### 2.3 Field Survey

Field survey work was undertaken during July and August 2013 with vegetation and arable crops in full leaf.

Site photographs were taken using a Canon Powershot SX210 IS digital camera with standard lens and 14.1 MP sensor. To achieve panoramic views (c. 90 degrees viewing angle) individual frames have been joined using Adobe Photoshop. No use of filters or colour manipulation have been applied.

The intention of these images is to convey an impression of the view that an observer would experience on the ground. A true and full appreciation of the view requires a site inspection. Photos should be viewed from 35cm distance.



# 3.0 BASELINE STUDY

## 3.0 LANDSCAPE CONTEXT

### 3.1 Regional Context

The West Lothian Landscape Character Classification (August 2014; West Lothian Council), drawing upon the previous Lothians Landscape Character Assessment (No. 91; 1998; ASH Consulting Group/SNH), describes Dykeside as being located on the boundary between Landscape Units 5 (Lowland Hills and Valleys – Bathgate Hills) and 7 (Broad Valley Lowlands – Couston Valley).

The Broad Valley Lowlands are gently undulating and heavily influenced by the presence of past industrial and mining industries. Agricultural land is mainly pasture interspersed with scattered small woodland, thin and broken hedgerows with periodic hedgerow trees; poor quality marginal land provides some variety. Settlements have expanded to sprawl well beyond their historic village cores; the fringes of urban area are in many cases discordant with the adjoining rural landscape, and unresolved. Transport and infrastructure is prominent in some areas, although less so north of Bathgate. The specific character of the Couston Valley is of a pastoral, featureless landscape lacking in structure and dominated by the neighbouring Bathgate Hills.

The Bathgate Hills (sole Landscape Unit in the Lowland Hills and Valleys Character Type), by contrast, are a rich and varied landscape with a complex topography underlain by harder igneous rock. Gradients are steep, clothed generally in pasture of a small-scale and intimate pattern with stone walls, fences, gappy hedges and broken lines of rather wind-blasted oak, ash, beech and thorn trees. Near the tops there are bare rock outcrops with associated gorse scrub, tall grasses and heather. Mixed shelterbelts are numerous. The hills afford panoramic views across the whole central belt and to the uplands beyond; they contrast markedly with the wooded farmland and urban/ industrial land uses at their feet and possess a strong sense of place as remote, elemental and far-seeing vantage points.

### 3.2 Geology & Soils

The underlying geology is of Carboniferous origin, consisting of folded layers of shales (oil shales), limestone, sandstone (ironstone) and coal measures. The Bathgate Hills are a basic igneous intrusion; their harder rock has been left standing proud of the country rock surrounding, with steep gradients and some craggy features.

Soils are brown forest soils of the Rowanhill series, derived from the underlying Carboniferous geology. The Macauley Land Capable for Agriculture Map identifies that the site incorporates soils in a range of classifications - 3.1, 3.2 and non rated areas. The details are provided in the Scoping Report prepared by EnviroCentre.

### 3.3 Landcover

Land cover is predominantly improved grassland with some arable. The basin of the Couston Water at North Couston contains extensive wet marginal grassland and wetland resulting from abandoned sand pit workings.

### 3.4 Landscape Planning Policies

The West Lothian Local Plan 2009 includes several landscape policies pertinent to this site.

The site lies within general countryside for which Policy ENV 31 applies; there is no particular landscape designation covering the site. The Bathgate Hills Area of Great Landscape Value (AGLV) covers land east of the B792 Torphichen Road. The AGLV policies (policy ENV 19 + 20) protect the landscape and visual characteristics that give the area its scenic quality; the policy extends to include proposals outwith the AGLV that might adversely affect it, and thus they effectively cover the site. The River Avon Valley AGLV also extends into the study area.

The West Lothian Landscape Designation Review of 2013 (LUC) recommended the designation of seven new candidate Special Landscape Areas; these will replace the current AGLV designations, which are considered to lack robust and defensible justification. The Bathgate Hills candidate SLA covers part of the proposed site; it consists of lowland hills, ridges and valleys with a distinct local sense of place.

Areas of Countryside Belt (policy ENV 21 + 22) and Areas of Special Landscape Character (policy ENV 23) exist to the west of Belvedere, to maintain separation of Bathgate from Armadale and protect the landscape qualities of Bogside estate and the Barbauchlaw Glen. These policies support the enhancement of landscape quality, new woodland and improved public access.

There are no habitat designations affecting the site; the nearest Site of Special Scientific Interest (SSSI) lies 1km east and 100m higher in elevation than the site, at Petershill (policy ENV 4). This site is protected due to a limestone outcrop and associated species-rich grassland. It is ecologically isolated from the site.

The Balbardie Park of Peace is designated as Land Safeguarded for Open Space (COM 2); it is an extensive urban park containing golf course, outdoor pitches and an indoor sports centre, together with considerable woodland planting. The Dykeside Farm lane and track from Belvedere to Nethermuir are Core Paths and proposed paths (policies ENV 26 & 27); these policies protect the core path network and promote new links to path networks on private land.

### 3.5 SNH Guidelines

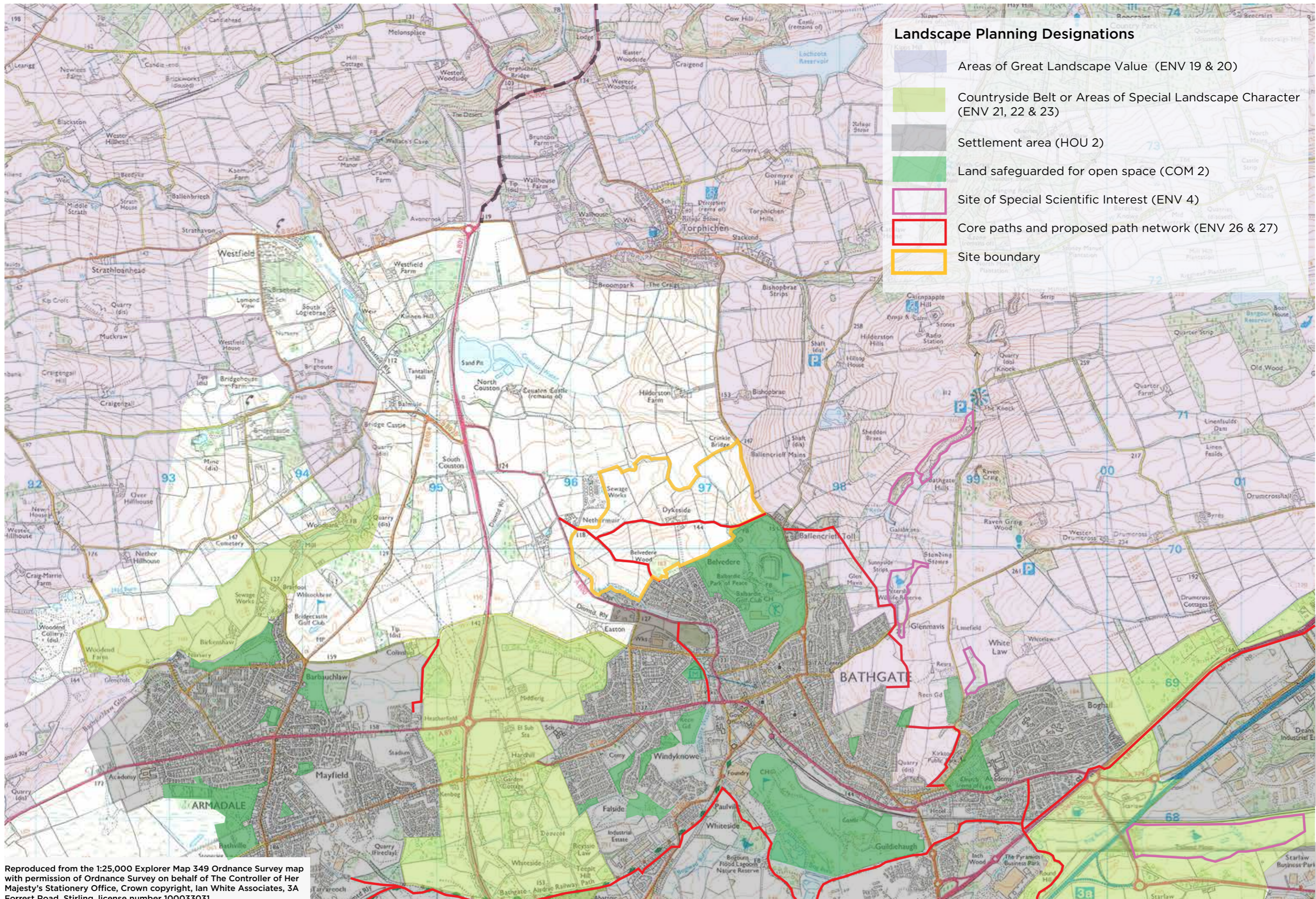
The SNH Landscape character assessment for the Lothians (ASH Consulting Group; 1998) gives the following guidelines for measures to retain and improve landscape character:

1. Create new large scale woodland framework through strengthening existing features including river and stream valleys, relict shelterbelts, derelict sites and the tree belts associated with more recent developments
2. Reinforce and restore deteriorating boundary features in farmland areas
3. Consider opportunities for large scale commercial woodland blocks within the overall pattern
4. Avoid coalescence of settlements within the M8 corridor
5. Communications corridor presents opportunity for significant landscape renewal

### 3.6 Central Scotland Forest

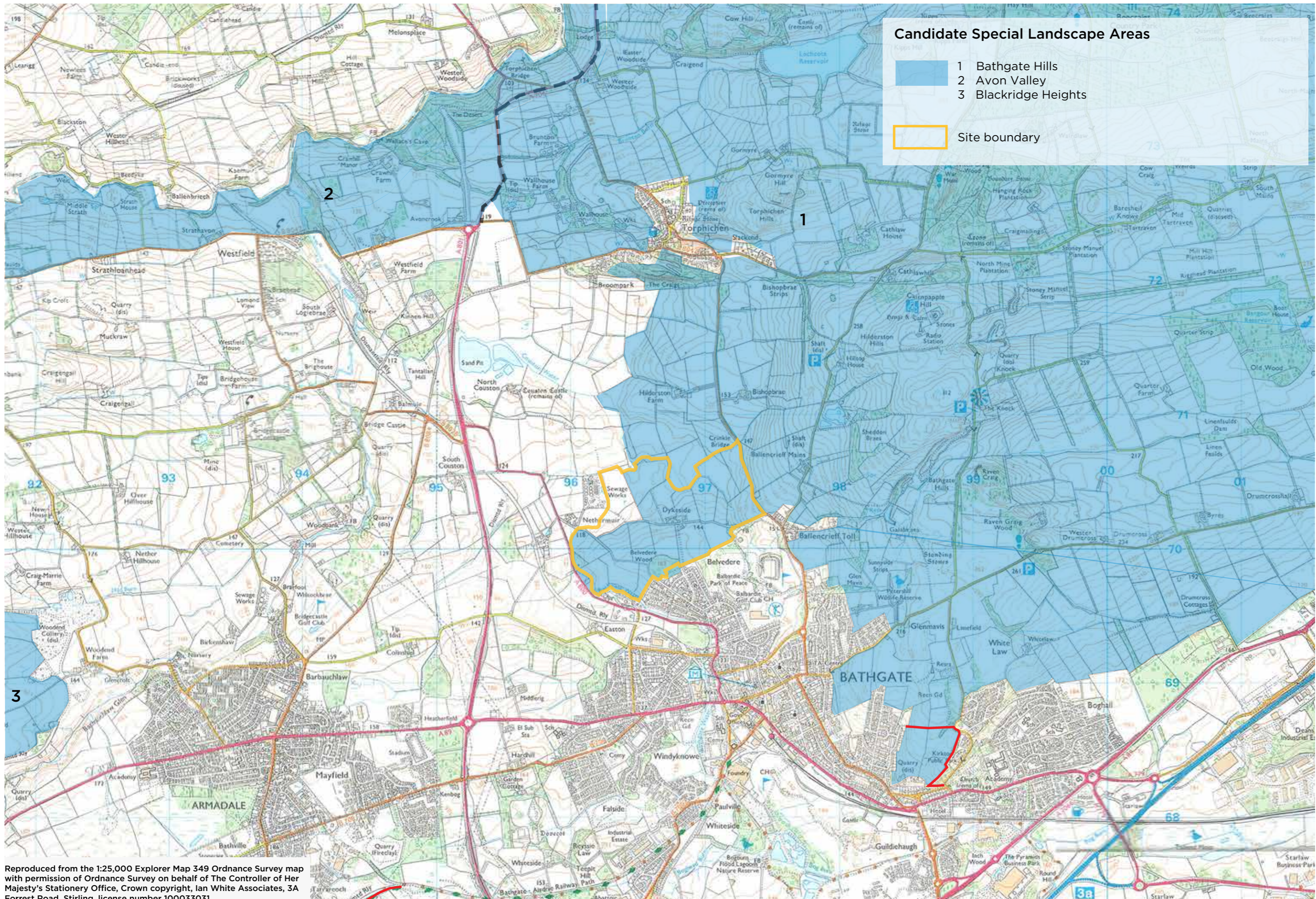
The site is within the Central Scotland Forest Strategy area. The key objectives of the CSF Strategy relevant to this site would be:

- Expansion of native woodland, achieved by developing integrated habitat networks
- Expansion of mixed woodlands, featuring particularly farm woodland, shelterbelts and field boundary trees
- Sustainable management of woodland and greenspace
- Compensation of any woodland lost to development
- A network of paths and trails providing high quality access opportunities for diverse groups-

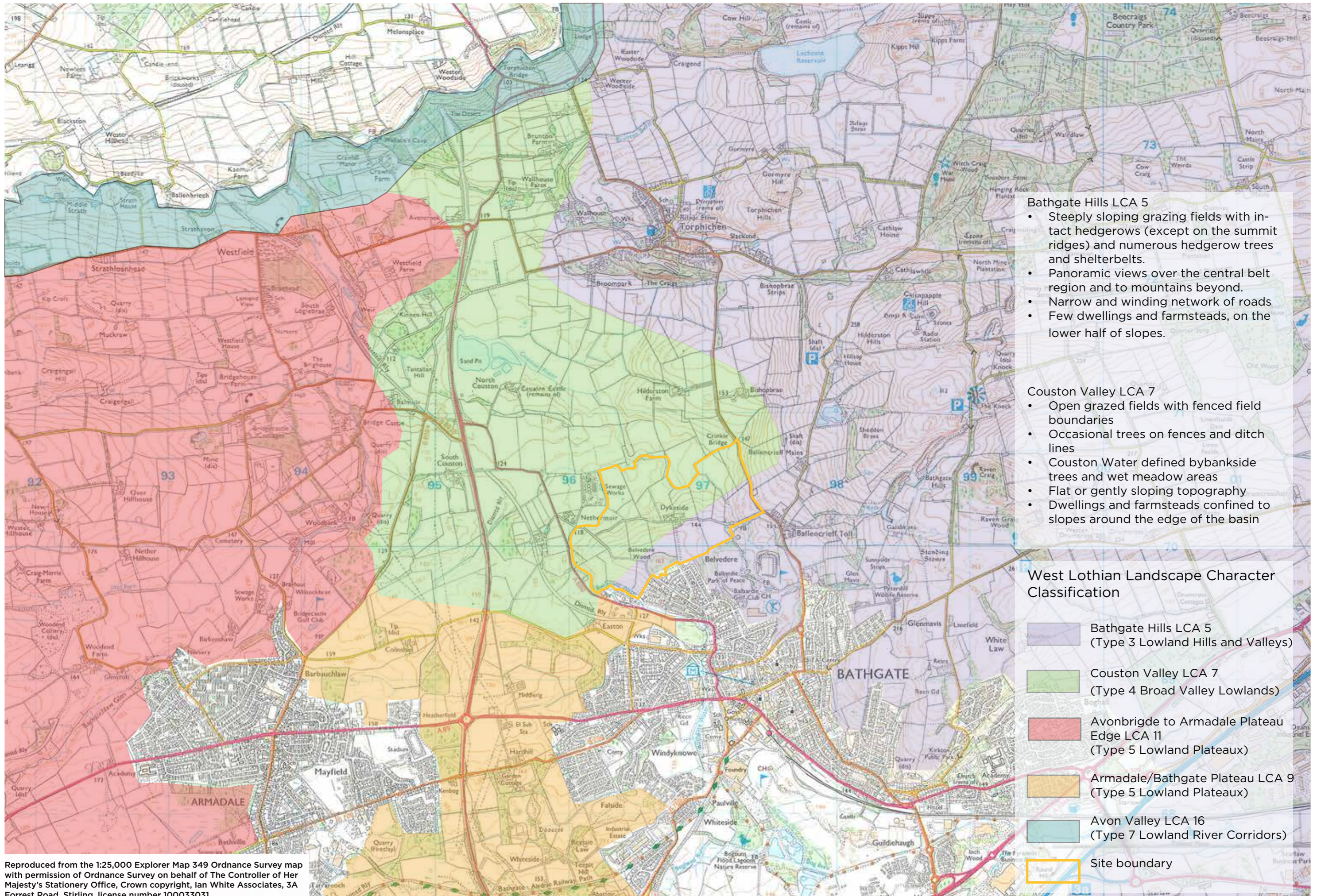


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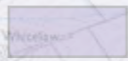







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- Bathgate Hills LCA 5**
- Steeply sloping grazing fields with intact hedgerows (except on the summit ridges) and numerous hedgerow trees and shelterbelts.
  - Panoramic views over the central belt region and to mountains beyond.
  - Narrow and winding network of roads
  - Few dwellings and farmsteads, on the lower half of slopes.

- Couston Valley LCA 7**
- Open grazed fields with fenced field boundaries
  - Occasional trees on fences and ditch lines
  - Couston Water defined by bankside trees and wet meadow areas
  - Flat or gently sloping topography
  - Dwellings and farmsteads confined to slopes around the edge of the basin

- West Lothian Landscape Character Classification**
-  Bathgate Hills LCA 5 (Type 3 Lowland Hills and Valleys)
  -  Couston Valley LCA 7 (Type 4 Broad Valley Lowlands)
  -  Avonbrigde to Armadale Plateau Edge LCA 11 (Type 5 Lowland Plateaux)
  -  Armadale/Bathgate Plateau LCA 9 (Type 5 Lowland Plateaux)
  -  Avon Valley LCA 16 (Type 7 Lowland River Corridors)
  -  Site boundary

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### 3.7 Landscape Character Appraisal

Dykeside is situated on the north-facing slope of a hill overlooking the valley of the Couston Water, immediately north of the Belvedere neighbourhood on the northern edge of Bathgate. The site descends to meet the Couston Water and extends around the western side of the hill to meet the A800 next to the Bathgate Water. The site lies in the range 115 - 153m elevation. The Couston Water drains north-westwards to meet the Barbauchlaw Burn just upstream of Westfield. The site lies at the western edge of the distinctive Bathgate Hills, where the landscape character changes from the elevated, varied topography into the denuded valley basin, before rising again less dramatically, onto the undulating Burnhead/Blackridge plateau.

The farmstead of Dykeside lies central to the site, on a narrow hedged lane that connects between the A800 and the B792. The farm buildings lie midway down the slope. The farm consists of regularly sized fields; on the upper slope these have drystone walls and hedges with occasional trees, whilst below the lane the field boundaries are less distinct, with greater presence of fences where walls have tumbled down or are absent (hedges are also less complete).

Landscape character of the flank of Belvedere Hill - gently sloping topography with stronger field boundaries and significant belts of woodland defining the ridgeline



The site lies against woodland along its southern boundary. Balbardie Park of Peace to the south-east is a recreation area containing and bounded by broadleaved woodland belts. Belvedere Wood itself lies on the summit of the hill; it is a fairly prominent feature in the wider landscape and strongly contains the housing of Bathgate that lies to the south. Belvedere Wood and Middlerig 1.2km to the south-west form a pair of similar features visible from much of the Couston Valley and surrounding slopes.

There are few woodlands or significant tree groups in the Couston Valley north of Belvedere, west of the B792 and east of the A801; the Couston Water is marked by intermittent riverbank trees and there are broken hedgerow trees on field boundaries. More significant hedgerow trees, mature hedges and linear tree groups occur on the slopes of Cairnpapple Hill from the B972 eastwards - into the area described as the Bathgate Hills landscape type.

The site is overlooked by a small group of houses on Dykeside Road and Hillhouse Avenue, adjacent to Belvedere Wood. Aside from these houses, the built mass of Bathgate lies south of the hill; the upper part of the Couston Water lies in a rural valley basin without significant intrusive urban features.

East of the site, the boundary with the Bathgate Hills landscape type is abrupt and coincides with the line of the B792 Torphichen road. The hill slopes have a strong pattern of intact hedgerows with many hedgerow trees which contrasts with the more open field pattern of fenced boundaries and few intermittent trees in the valley basin.

The site and neighbouring fields consist predominantly of pasture but with some arable on the slopes. In the foot of the valley there are areas of marginal damp grassland. An extended phase 1 habitat survey undertaken by Stuart Spray Wildlife Consultancy has found that the site and wider surroundings can be categorised as having only limited habitat complexity or ecological value. It is an agricultural landscape of mainly poor semi-improved neutral grassland with degraded linear features (hedgerows, ditches and watercourse) and some young woodlands. Mature trees are present only in small numbers and there is an absence of maintenance or restocking of hedgerows or hedgerow trees. Protected species were not found to be present within the study area.

Typical landscape character in the Couston valley - open pasture with indistinct field boundaries, rather flat topography and an absence of trees or hedgerows.





### 3.8 Visual Appraisal

The site is not visible from areas to the south of Belvedere hill and Balbardie Park of Peace; the crest of this ridge runs just south of the site boundary and is defined by woodland. There are less than a dozen houses in the Belvedere neighbourhood, on Dykeside Road and Hillhouse Avenue, that have views northwards into the site.

Part of the site extends around the western flank of Belvedere hill, and is visible from the vicinity of Easton and from the western most houses flanking the south of Belvedere Wood. This western part of the site has the highest elevation and forms a distinctive feature in views from the Couston Valley and the rising land to westward. It appears as a grassy slope topped by the dark mass of belvedere Wood, and forms a pair with the similar feature of Middlerig. In such views there is a distinct saddle at Balbardie, before the land rises sharply at Ballencrieff Toll and upwards onto the Bathgate Hills; this saddle exposes the residential area of Glenmavis to view.

From the north the site is visible within a wide area. The slopes above Dykeside Farm steading are visible from further afield than the lower slopes and flat valley land north of the farm lane. From within the Couston Valley and the rising land to the west, the lower parts of the site are screened from view by intervening undulations of topography, transport features and by woodlands (especially west of the A801, where woodland cover is much higher). From the higher land between Westfield and Armadale, views of the site are confined to the part that flanks the western side of Belvedere Wood; other parts lie lower and more contained by folds in landform and by the layering effect of intervening trees and woodlands. The absence of woodland cover in the Couston Valley mean that the site is visible from as far north as the B8047 near Torphichen; the village core of Torphichen is hidden behind the Craigs, but several houses on the B8047 will in winter have filtered views to the site through the trees above The Craigs. From viewpoints in the vicinity of Torphichen, Belvedere Hill combines with Middlerig to form a continuous ridge of farmland and woodland hiding Bathgate beyond.

The Bathgate Hills dominate the locality and afford expansive views over the site, except for the south-western part which lies behind Belvedere hill. The impressive views take in a large expanse of the central belt of Scotland, from the mountains of highland Stirlingshire to the Southern Uplands. Dykeside forms a small part of the lower foreground in such views.

The Couston Valley is distinctly rural in character, although of rather poor landscape quality due to the lack of pattern and degraded state of landscape features. The village of Torphichen is separated from Bathgate by a gap consisting of rolling fields along the foot of the Bathgate Hills, and the flat open valley floor of the Couston Water.

Within the site, the lanes past the farm and up to Belvedere Wood are core paths and both afford elevated views across the lower slopes and flat base of the Couston valley. The lack of hedgerows and trees on the lower part of the site mean that intervisibility within this part of the site is good; the upper parts are more affected by trees and the effect of topography.

# 4.0 DESCRIPTION & APPRAISAL OF EFFECTS

## 4.1 Description of the Proposed Development

The development proposal is described on EMA Architecture and Design drawing 13030 (SK) 003 Masterplan Framework.

The proposal occupies a site of 95.3ha, with a proposed development area of 42ha. The development would consist of housing, predominantly of 2-storey dwellings but with some 3-storey buildings in the core area east of Dykeside Farm. The balance of 53ha of land would consist of woodland, wetland, meadow and amenity landscape.

The proposed landscape strategy seeks to establish a robust structure of woodlands at boundaries, on the ridgeline and as subdivisions within the site. These will connect to existing woodland at Belvedere and Balbardie, to create strong boundaries and control visibility into the site from the wider area. The scale of existing woodlands at Belvedere and Balbardie inform the type of woodland proposed for the site boundaries and to subdivide the building mass inside the site. The existing woodlands provide a strong natural boundary to Bathgate; this will be widened.

The Bathgate Burn and Crinkle Burn form important boundary features. A riparian park will run continuously along these edges to provide a buffer zone of native marginal and damp meadow habitat, with native riparian woodland planting. This park will connect to habitat beyond the site, and to the woodland and SuDS wetlands of the development.

Existing field boundaries will be used to structure the development areas; hedges will be reinforced and linear woodland belts introduced. At the higher area around Belvedere Wood, new woodland planting combined with open greenspace will preserve the distinctive hill feature in views from the north and west. This addition would be supported by the Central Scotland Forest Plan.

Although vehicular access into the site from Belvedere and Balbardie is precluded, connections into the footpath network will be made to serve local communities and provide links to shops, services, schools and leisure facilities.

## 4.2 Predicted Landscape and Visual Effects

The Proposed development will result in the conversion of 92ha of agricultural land to residential and landscape uses.

The landscape character of the site will become urbanised. A significant proportion of green elements will surround and subdivide the predominantly built areas. The proposed increase in woodland cover together with hedgerows will result in a more dense and varied tree cover and this will reduce the scale and increase the intimacy of the landscape.

The expansion of development into the Couston Valley will change the character of this landscape unit, which is currently rural and rather neglected in appearance. Unlike the neighbouring Bathgate Hills, the valley lacks strongly defining character other than the sense of being empty. The landscape character serves to provide a contrasting setting for the Bathgate Hills; development is not necessarily inconsistent with the setting of the hills, as

demonstrated at Ballencrieff Toll and Balbardie.

The candidate Special Landscape Area for the Bathgate Hills is based on designation of the entire Unit 5 landscape character area, which is defined as including the majority of the proposed site. The neighbouring Couston Valley landscape character area (Unit 7) comes last in the ranking of landscape units in the SLA scoring method. The proposal site does not appear to have the characteristics of the core area of Unit 5 and on the SLA mapping appears as an eccentric salient. There is an abrupt change in recognised value along the boundary between these two landscape types. Detailed appraisal of this boundary in the field reveals that, in common with most boundaries between landscape character areas, there is in fact a transition zone intermediate between the two landscape types.

The proposals lie outwith the Bathgate Hills AGLV, the western boundary of which is defined by the Torphichen Road. They would have a localised adverse impact upon the setting of the AGLV, but this would not be of sufficient magnitude to significantly impact upon the integrity of the AGLV.

Creation of the new access road off the B792, together with views over the eastern half of the site, will impact upon the character of the road. The new junction will break through the current hedgerow and widen the road at this point; the roundabout will introduce a sub-urban form that reduces the distinction between rural road and urban street that currently occurs at Ballencrieff Toll.

Development of the south-eastern part of the site, on the plateau behind Dykeside Farm, will occupy a pocket that is naturally enclosed to a degree by topography and woodlands. Development here would interfere with views from several properties on Dykeside Road and Hillhouse Avenue (currently across open farmland), but the presence of these existing houses on the crestline, seen from the B792 when approaching from Torphichen, already locally reduces the sense of separation between rural and urban character.

The existing woodland at Belvedere Wood and Balbardie Park of Peace, together with trees and hedgerows alongside the lanes and at field boundaries, will be retained; succession planting will secure the future of these features. Stone wall field and lane boundaries will be conserved.

Within the site there are currently few areas of wetland and marginal habitat; fields are cultivated or grazed close to the steep banks of the ditches and burns. The proposed riparian park will increase the area of natural streamside habitat and accommodate periodic flooding. The SuDs network of ponds, basins and swales will link up to this habitat and connect throughout the site.

The proposed landscape framework of the development will include :

- Mixed deciduous woodland shelterbelt
- Deciduous riparian woodland
- Wetland and marginal habitat
- Meadow grassland including swales
- Mixed deciduous hedgerows
- Amenity grassland and play areas

Within the residential development plots there will also be large areas given to private residential gardens. These have good potential to provide varied habitat for fauna, even if their flora is intensively managed or of non-native species.

As a cohesive network of linear habitats, the proposed landscape structure, together with the private gardens, will provide greater diversity of habitats than are currently found on site (the majority of which is arable land or improved pasture of low biodiversity).

The existing limited network of paths, formal and informal, across the site would not be affected by the proposals. New paths created within the development and through the riparian park network will provide increased length of path access to existing residents. Access to open countryside from existing housing areas will be adversely impacted, as the distance will be increased. Footbridge crossings of the burns will be required to facilitate access to land north of the site.

The effect of the proposals on views from the north and west will be limited by distance of viewer, intervening trees and by topography. The proposed housing will not break the skyline of Belvedere hill, and so will maintain the strong skyline of woodland seen from afar. The new housing will appear to connect with existing housing visible at Dykeside Road and Ballencrieff/Glenmavis, which already breach the topographic confines of Bathgate town.

From the west and south-west, development would continue the band of housing that has advanced since the 1960s down the valley of the Bathgate Water; currently the residential area beneath Belvedere Wood has no natural boundary defining its edge with open countryside. The proposals may provide a robust and defensible new boundary between Easton and Nethermuir.

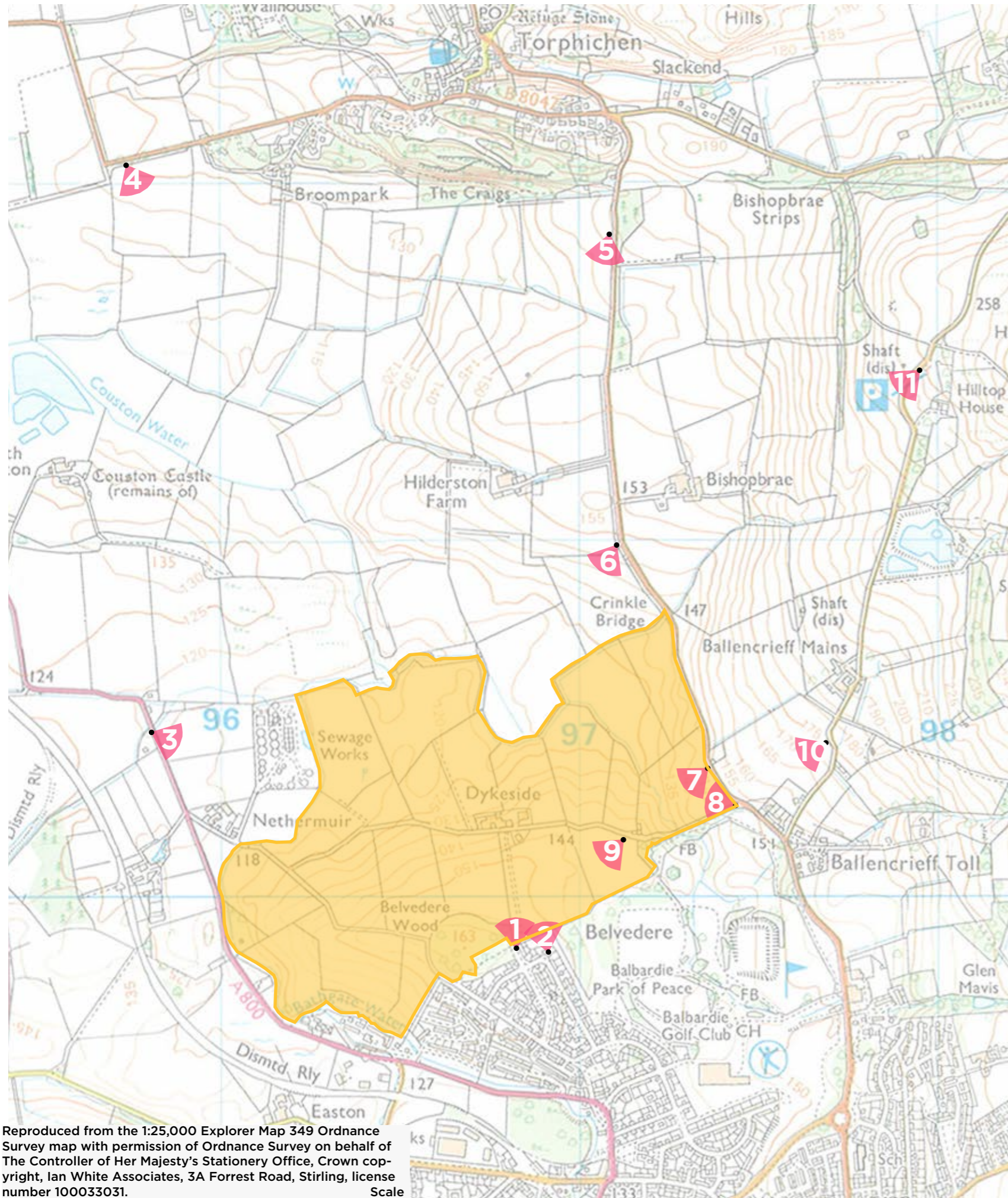
## 4.3 Zone of Visibility

The area from within which views to the proposed built development are possible has been plotted from OS data and then subjected to field review. This zone takes account of significant screening vegetation likely to have year-round effect; more intermittent, narrow or permeable woodland or lines of trees have been ignored as these would be unlikely to provide an effective visual barrier in the winter.

The appraisal of the zone of visibility ignores the medium and long term effect of woodland planting proposed on the development framework plan. It is based upon visibility of the buildings alone. Such planting would be expected to reduce the visual envelope as it matures.

## 4.4 Viewpoints

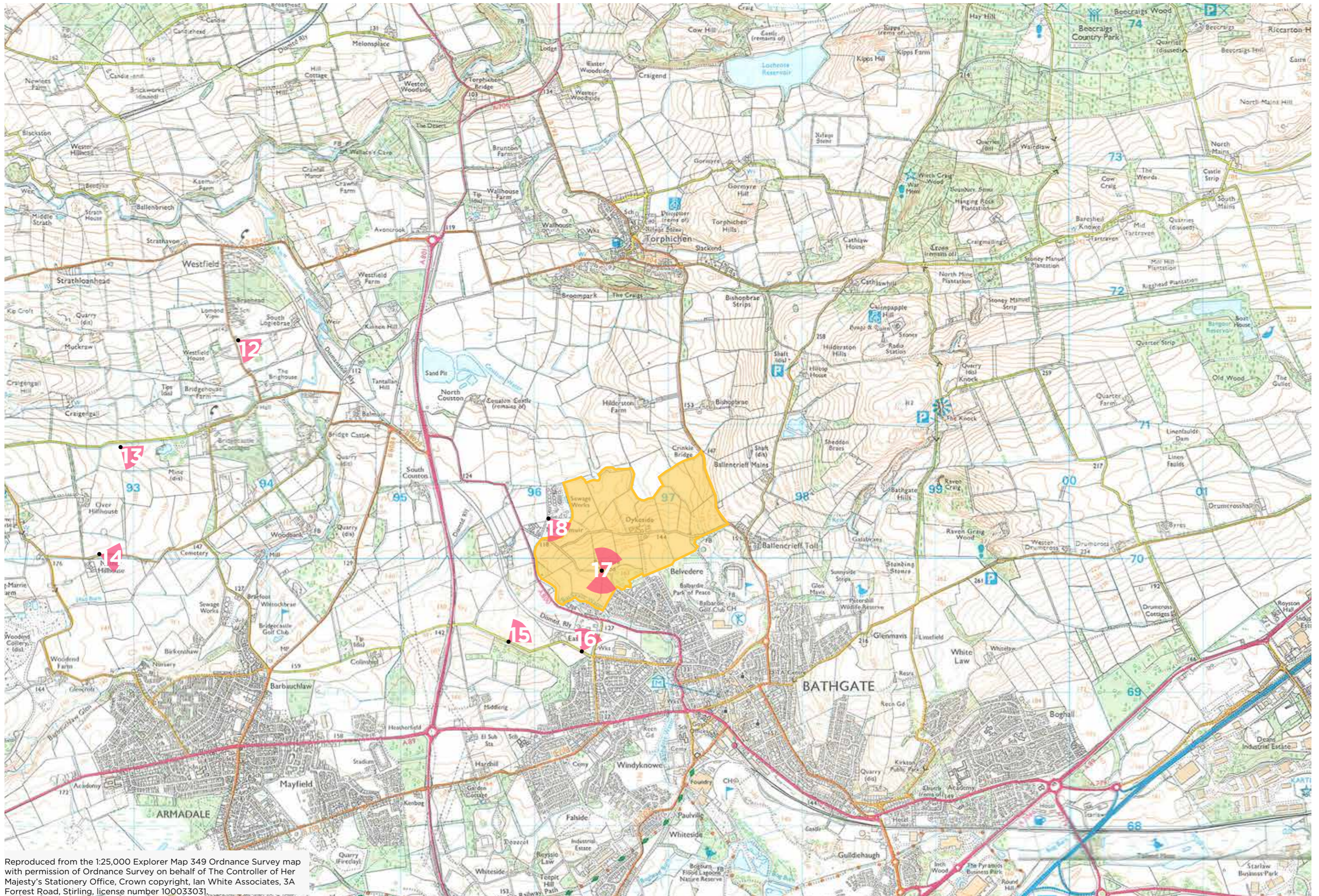
A number of viewpoints were selected to provide perspectives of the site from a range of directions and distances, and to be representative of the view from identified human receptors - either residences, routes or leisure features. The site has been highlighted in pale yellow with a dotted boundary, where consistent with the scale of the area in view; for distant views the site may be indicated solely by annotation, to avoid impacting on resolution of the image.



# VIEWPOINTS

No	Location	Reason for selection	km from site	OS grid ref.	Direction of view
1	Dykeside Road	View from houses and from public road	0.00	E 296815 N 668865	N
2	Dykeside Road / Hillhouse Avenue	View from houses	0.05	E 296855 N 668880	N
3	A800 at Nethermuir	View from public road and houses	0.39	E 295800 N 670465	ESE
4	B8047 west of Torphichen	View from public road	1.55	E 295700 N 672055	SSE
5	B792 south of Torphichen	View from public road	1.24	E 297100 N 671855	S
6	B792 south of Torphichen	View from public road	0.24	E 297100 N 671000	S
7	B792 north of Ballencrieff Toll	View from public road	0.00	E 297365 N 670360	W
8	B792 at Ballencrieff Toll / Dykeside Farm track	View from public road and Core Path	0.00	E 297455 N 670255	W
9	Dykeside Farm track	View from Core Path	0.00	E 297145 N 670160	S
10	Ballencrieff Mains	View from public road and from houses	0.58	E 297705 N 670445	WSW
11	Hilltop	Public road and car park	0.97	E 297975 N 671490	SW
12	B8028 at Logie House	View from public road and from houses	2.65	E 293750 N 671800	SE
13	Over Hillhouse	View from public road	3.12	E 292880 N 670780	ESE
14	Nether Hillhouse	View from public road	3.16	E 292600 N 670050	E
15	below Middlerig	View from public road	0.52	E 295820 N 669250	NE
16	western Bathgate	View from public road and from houses	0.35	E 296200 N 669250	NNE
17	Belvedere Wood	View from Core Path	0.00	E 296450 N 669860	N and S
18	Nethermuir	Western edge of site	0.17	E 296950 N 667025	SSE

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# 1 View from road end at Dykeside Road

Dykeside Farm

B792 Torphichen Road

Cairnpapple Hill

Existing housing on Dykeside Road



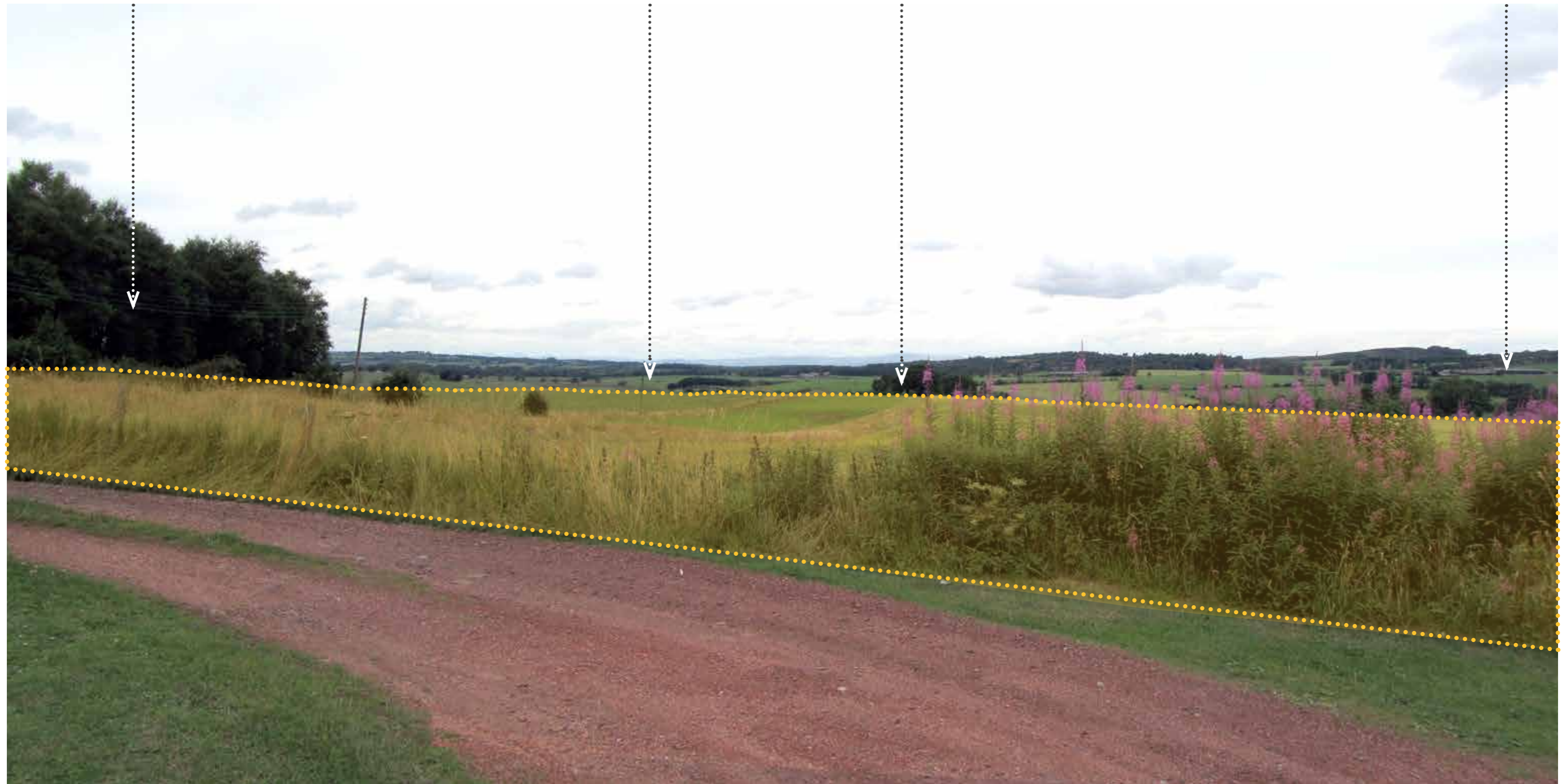
## 2 View from rear of Hillhouse Avenue housing

Belvedere Wood

Couston Water valley

Dykeside Farm

Hilderston Farm



### 3 A800 Cottages near Nethermuir

Couston Water valley

Dykeside Farm

Site

Belvedere Wood



# 4 From B8042 west of Torphichen

Bathgate Hills

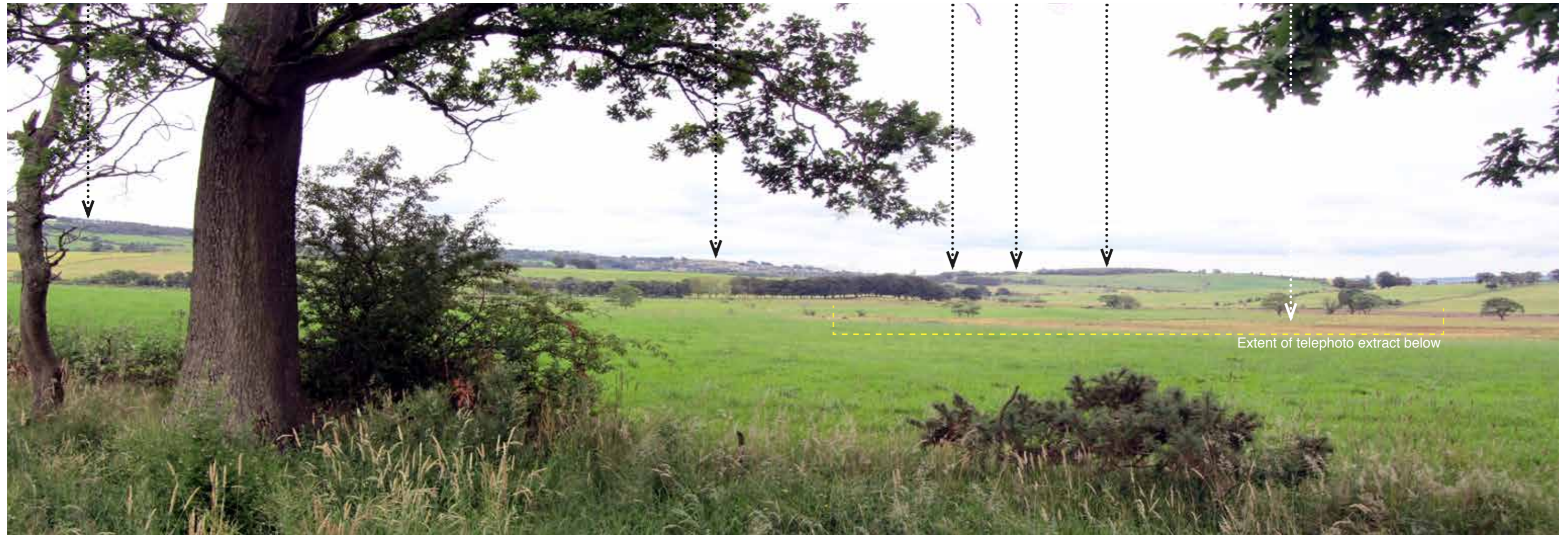
Bathgate (Glenmavis)

Dykeside Farm

Site

Belvedere Wood

Couston Water valley



# 5 B792 south of Torphichen

B792

Belvedere Wood

Armada Station

Couston Water valley



# 6 B792 near Bishopbrae Farm

Balbardie Park of Peace

Belvedere Wood

Dykeside Farm

Couston Water valley



# 7 B792 north of Ballencrieff Toll

Balbardie Park of Peace

Dykeside Road houses

Dykeside Farm

Couston Water valley



# 8 B792 at Dykeside Farm lane

Balbardie Park of Peace

Dykeside Farm

Couston Water valley





# 9 Dykeside Farm lane

Balbardie Park of Peace

Dykeside Road houses

Belvedere Wood



Viewpoint at gateway (below)



Site

View from gateway

# 10 Ballencrieff Mains Farm

Bathgate

Balbardie Park of Peace

Belvedere Wood

Dykeside Farm

Couston Water valley



# 11 Ballencrieff road at Hilltop carpark

Balbardie Park of Peace

Bathgate

Belvedere Wood

Dykeside Farm

Armadale Station

Valley of the Couston Water



Cairnpapple Hill

Hilderston Farm

Belvedere wood (site beneath)

Bathgate



# 13 South of Craigengall

Unclassified road to Hillhouse

Cairnpapple Hill

Site

Belvedere Wood

Bathgate



# 14 Nether Hillhouse

Site Belvedere Wood Bathgate

Pentland Hills



# 15 Easton road near to A801

Nethermuir sewage works

Cairnpapple Hill

Belvedere Wood

Belvedere housing



Belvedere Wood

New housing onto the A800





# 17 Belvedere Wood

View to South

Belvedere Wood

New housing onto A800



Hilderston Farm

Dykeside Farm

Cairnpapple Hill

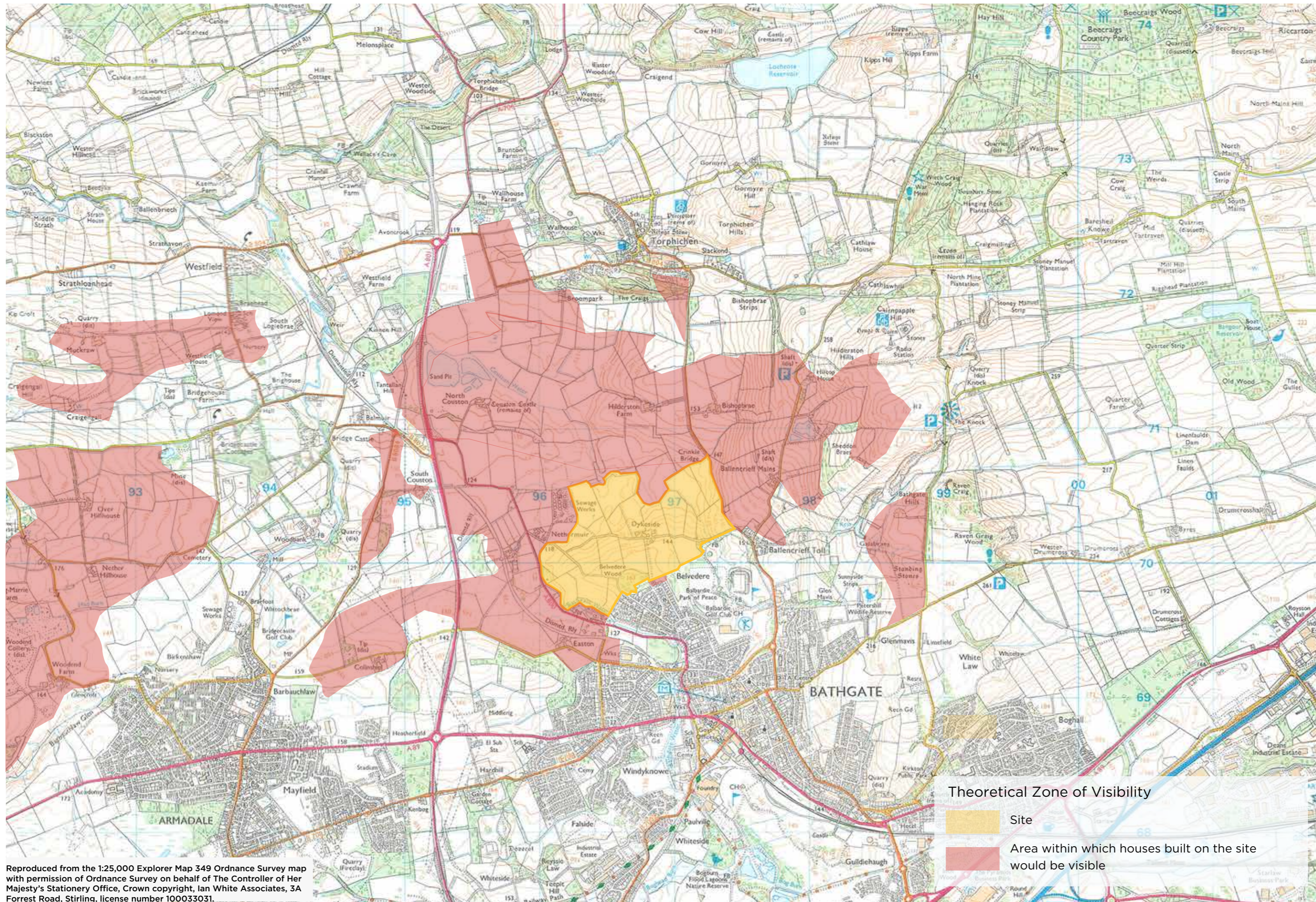


Boundary of sewage works

Dykeside Farm

Belvedere Wood





Theoretical Zone of Visibility

- Site
- Area within which houses built on the site would be visible

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#### 4.5 Significance

The predicted effects will result in changes to the landscape and visual environment. The significance of these changes depends upon their magnitude and the sensitivity of the receptor.

Receptor	Predicted effect	Magnitude of effect	Sensitivity of receptor	Significance
Bathgate Hills candidate SLA	Interruption of the transition between valley and upland landscape along the western edge of the LCA. Loss of Belvedere hill from the SLA.	Moderate. The development will alter the local landscape character, but will have characteristics consistent with neighbouring built-up area of Bathgate	High	The proposals will cause an <b>adverse impact of moderate significance</b> on the candidate SLA. However, this impact relates to a part of the SLA that extends beyond the core character area of the Bathgate Hills; Belvedere hill is located at the margin of the LCA and can be considered an outlier that does not contribute to the integrity of the SLA.
Bathgate Hills AGLV	Interruption of the transition between valley and upland landscape beyond the western edge of the AGLV	Moderate. The development will alter the local landscape character, but will have characteristics consistent with neighbouring built-up area of Bathgate	Moderate. The site lies outside the AGLV and would have only limited affect upon it in the context of existing built development fringing the AGLV at Ballencrieff Toll	The proposals will cause an <b>adverse impact of minor significance</b> on the AGLV. They would affect the setting of a landscape of recognised character
Residents at Dykeside Road and Hillhouse Avenue	Interruption of views northwards (change from farmland to residential development)	Substantial. The development will alter the visual character to considerable degree	Moderate or High (depending upon the aspect of each house affected). The affected residences look directly onto the site.	The proposals will cause an <b>adverse impact of moderate to major significance</b> on those residents whose rooms directly overlook the development site.
Residents at Chapman's Brae and alongside the A800 (south of Belvedere Wood)	Interruption of views north-westwards (change from farmland to residential development)	Moderate. The development will alter the visual character to a noticeable degree, causing some change to the character although in the context of other recent development in view.	Moderate or High (depending upon the aspect of each house affected). The affected residences look directly onto the site.	The proposals will cause an <b>adverse impact of moderate significance</b> on those residents whose rooms directly overlook the development site.
Residents at Torphichen	Increase in visible built development in view	Slight. The proposals lie a considerable distance from the viewer and would not have a marked affect on overall visual character	Moderate. The affected residences look towards the site through a belt of trees that afford some screening and distraction	The proposals will cause an <b>adverse impact of minor significance</b> on those residents with views towards the site. The change would have barely perceptible impact on visual quality.
Viewpoints to the North (non-residential)	Increase in visible built development in view	Moderate. The development will alter the visual character, increasing the extent of built development visible.	Low. A viewer in a car or on foot is transient and not immersed in landscape of a high quality	The proposals will cause an <b>adverse impact of minor significance</b> on those on foot or in a car with views towards the site. The change would have barely perceptible impact on visual quality.
Viewpoints to the West (non-residential)	Increase in visible built development in view	Slight. The visible extent of the proposals will be of such limited scale that awareness of them will not have a marked impact on the overall visual character, which is dominated by the Bathgate Hills in the background.	Low. A viewer in a car or on foot is transient and not likely to notice change to the view at such a distance and scale when occupied.	The proposals will cause an <b>adverse impact of minor significance</b> on those on foot or in a car with views towards the site. The change would have barely perceptible impact on visual quality.
Viewpoints to the North-East (within the AGLV)	Increase in visible built development in view	Slight. The development will alter the visual character, increasing the extent of built development visible but only at a small scale relative to the breadth of the views available.	Moderate. The viewer is within an area of high landscape quality with expansive views; they are likely to be attuned to the visual environment and to notice change.	The proposals will cause an <b>adverse impact of minor significance</b> on those in the AGLV with views towards the site. The change would be noticeable but consistent with the context of built-up areas in the lowland valleys below the AGLV. The separation of altitude and the wide expanse of view limit the scale of the proposals.
Core paths within the site	Change in character of the view and setting	Substantial. The development will alter the visual character to considerable degree	Moderate. The paths are used by local walkers seeking a rural setting; they are likely to be attuned to the visual and spatial environment and to notice change. The immediate context of these paths will remain as woodland/greenspace in the masterplan	The proposals will cause an <b>adverse impact of moderate significance</b> on users of the core paths which pass through the development site.

# 5.0 MITIGATION

## 5.1 Mitigation

The following measures would reduce the predicted adverse impacts of the development proposals :

Extension of woodland planting to connect between Nethermuir and Belvedere Wood so that the ridgeline between the Bathgate valley and the Couston Valley is maintained as a landscape element not broken by building rooflines. This woodland should be a belt of minimum 50m width with a minimum offset of 10m of open space provided to each side. All residential properties to lie outside this minimum 70m zone, so that the woodland has sufficient space to mature without pressure from residents demanding greater light etc.

A broad swathe of open greenspace should surround Belvedere Wood (except where new woodland belts run up to meet the existing wood) so that the wood retains a relationship with grassland in views from the Couston Valley and viewpoints to the west.

Design of the new road junction on the B792 should seek to accord with a rural idiom; geometry should be kept as tight as possible in order that artificial landforms and loss of existing trees, hedges and stone walls is minimised.

The extent of street lighting should be minimised beyond the residential areas, to avoid intrusive effects upon the urban edge nocturnal environment. Modern fittings with horizontal cut-off optics and natural white balance should be used to minimise light pollution and create a more human character.

Off-site planting of field boundaries in the Couston Valley, to improve the continuity of hedges and introduce more hedgerow trees, would help to knit the proposals in to the setting and to enhance the landscape character area.

# APPENDIX A

## Assessment Methodology

The method of assessment used is based upon that included in the 'Guidelines for Landscape and Visual Impact Assessment : Second Edition' (2002) published jointly by the Landscape Institute and the Institute of Environmental Management and Assessment.

The measure of effects resulting from the development is expressed in terms of Significance. The two criteria which determine the significance of impacts are the scale or Magnitude of the effect and the Sensitivity of the landscape or visual receptor upon which the effect is imposed. It is important to understand the criteria under which each of these criteria are judged, and also the manner in which magnitude, sensitivity and significance are expressed.

### Magnitude

This is a measure of the scale or degree of change to the landscape resource or visual amenity, which includes consideration of the nature of the effect and whether it be temporary or permanent. Magnitude is expressed as either Adverse or Beneficial and according to the following scale.

Magnitude	Landscape Effects	Visual Impact
Substantial	Major alteration to key elements of landscape character, or the introduction of elements considered to be uncharacteristic within the receiving landscape.	The proposals form a significant and immediately apparent part of the scene that markedly changes overall visual character.
Moderate	Partial loss/alteration to key elements of landscape character, or introduction of elements that may be prominent but not necessarily substantially uncharacteristic of the receiving landscape.	The proposals form a visible and recognisable new element within the scene, readily noticeable by the observer, and causing some change to visual character.
Slight	Minor loss / alternation to the landscape character, or introduction of elements not uncharacteristic of the receiving landscape.	The proposals are of such limited scale or visibility that awareness of them does not have a marked impact on the overall visual character.
None	Change to the landscape character that is so minimal or introduction of elements characteristic of the existing condition, that the effect is negligible.	The proposals are either not visible, such a small part of them is discernible, or the distance so great, that the impact is nil or scarcely appreciated.

Due to the potential for effects to be either temporary or permanent, the magnitude may be expressed as either a single, permanent value, or as temporary and permanent values along with an explanation for the nature and duration of change in magnitude.

### Sensitivity

This is a measure of the degree to which a landscape type or visual receptor can accommodate change without detrimental effects to character (landscape) or visual amenity (of the receptor).

The sensitivity of a landscape type is determined by evaluation of the baseline value and the degree to which key elements of the landscape type can be replaced or altered before adverse change to the landscape character occurs.

The sensitivity of a visual receptor will depend upon the location and context of the viewpoint, the nature of activity undertaken by the receptor and cultural value of the view.

Sensitivity	Landscape Receptor	Visual Receptor
High	A landscape character type of designated value or whose character is distinct and of high value.	Activity of the receptor is directly related to the visual quality, or exposure of the receptor is not transitory. A view of local value.
Moderate	A Landscape whose character allows some effects to be accommodated without changing the character, provided the effect is of limited magnitude.	The view is not critical to the receptor. The receptor may be transitory, or their activity less exposed to the view.
Low	A landscape within which changes at many scales can occur without obvious impact on character, due either to existing poor quality or robustness.	The visual receptor will not notice or be affected by change to the view.

### Significance

A balanced and well-reasoned judgement of magnitude and sensitivity leads to a determining of overall significance, of both landscape and visual effects. This measure is expressed according to the scale noted below, and will also be described as adverse or beneficial. The significance may be expressed separately for short term and longer term conditions, to reflect the impact of construction related activities and the establishment of new planting.

Significance	Landscape Effects	Visual Impact
Major	The proposals would result in effects that cannot be mitigated, are at considerable variance to the landscape character, degrade the integrity of the landscape, or will cause substantial damage to a high quality landscape.	Adverse : Proposals would cause a substantial deterioration in visual quality.  Beneficial : Proposals would cause a substantial improvement in visual quality
Moderate	Adverse : The proposals would be out of scale or at odds with the local pattern or landform and will leave an adverse impact on a landscape of recognised quality.  Beneficial: The proposals would fit well with the landscape character and improve the quality through removal of damage caused by existing uses	Adverse : Proposals would cause a noticeable deterioration in visual quality  Beneficial : Proposals would cause a noticeable improvement in visual quality
Minor	Adverse : The proposals would not quite fit the scale and form of the existing landscape or would affect a landscape of recognised character.  Beneficial: The proposed scheme would fit in with the scale and pattern, and restore some of the valued characteristics lost through current land uses	Adverse : Would cause a barely perceptible deterioration in visual quality.  Beneficial : Would cause a barely perceptible improvement in visual quality
Neutral	Scheme would compliment existing scale, landform, pattern, and maintain existing landscape quality and character.	No discernible change in the existing visual quality or character.

### Duration

The potential duration of effects are considered in defining both the magnitude and significance. Short-term effects resulting from construction works are temporary in nature. Long-term or permanent effects operate over the lifetime of the development (buildings, roads, trees etc), although their magnitude can diminish as tree planting grows and contributes to the creation of an effective landscape structure and improved visual amenity.