



West Lothian Council

THE WEST LOTHIAN LOCAL DEVELOPMENT PLAN (LDP)

CONSULTATION RESPONSE PORTAL

Have Your Say on the Proposed Plan

Introduction

West Lothian Council has published its Proposed Plan together with supporting documents including an Environmental Report (SEA), Habitats Regulation Appraisal, Strategic Flood Risk Assessment and Equalities & Human Rights Impact Assessment. These can be viewed on the West Lothian Council website at www.westlothian.gov.uk/proposedplan.

If you wish to make representations on the Proposed Plan or associated documents you are encouraged to use this online consultation portal. It's quick and easy and will help us to process representations more efficiently, reducing the overall cost and environmental impact of the exercise.

You do not need to complete this questionnaire in a single visit. Just simply put your Survey Reference Number (CODE) in the top right corner of the screen to allow you to continue with your submission at a later date.

If you need assistance with completing or submitting your representation online please call the Customer Service Centre (CSC) on 01506 280000. Please advise the Customer Service Centre that your enquiry relates specifically to the Local Development Plan and ask for it to be logged and directed to the Development Plan and Environment Team. Someone will contact you. Alternatively you can email us at wlldp@westlothian.gov.uk We will endeavour to respond as quickly as possible but in any event within 3 working days of receiving your enquiry.

It is important that all representations are submitted no later than midnight on Sunday 22 November 2015. Representations received after that time will not be considered.

Your comments should be concise, having regard to paragraph 84 of Scottish Government Circular 6/2013: Development Planning which states that representations should be no more than 2,000 words plus any limited supporting productions.

Data Protection Statement

Please be aware that when you make representations on the Proposed Plan through the consultation portal (and/or in a conventional written format) personal information provided as part of a representation cannot be treated as confidential. Representations require to be made available online and for public inspection at the council's office (this would include your name but would exclude any information which would be subject to the Data Protection Act 1998 i.e. signature, postal address, telephone number, email).

We are also required to pass these details to the Scottish Government's Directorate of Planning and Environmental Appeals (DPEA). This is because they may at a later date wish to invite you to an Examination in Public of the Proposed Plan to discuss your representation.

Before using the consultation portal you should also note that any information posted may be subject to disclosure under the Freedom of Information (Scotland) Act 2002. West Lothian Council will not be liable for any loss or damage arising from or in connection with the disclosure of any information including the disclosure of user generated content.

1. GENERAL INFORMATION

Your Details

Please indicate in what capacity you are making this submission: *

Please note that this is a mandatory field

- 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: *

Please note that this is a mandatory field

Title

First Name

Surname

Email Address

Telephone

Postal Address

Organization Name

Client's Name

Is this the first time you have made a written representation on the Proposed Plan? *

Please note that this is a mandatory field

- yes
- no

If you have previously submitted a site to be considered for development when the Council was initially seeking Expressions of Interest (EOI), or commented on the Local Development Plan at the Main Issues Report (MIR) stage, or made a previous submission to the Proposed Plan please provide the reference given to you at that time if known.

EOI & MIR reference number can be found on any email or written communication we may have previously sent you

Enter EOI (Expression of Interest) reference here

Enter MIRQ (Main Issues Report) reference here

Please enter your survey reference number in the text box below. *

Survey Reference Number (CODE) can be found in the top right corner of this screen
 Survey Reference Number (CODE) will allow you to save your responses and return to finish the survey later

Please keep a note of your Survey Reference Number (CODE) for future reference

Please note that this is a mandatory field

2. FOREWORD (page 4)

This introduction by the Leader of the Council establishes the role of the LDP and how it will help deliver the council's core objectives.

Do you wish to make a comment?

- yes
- no

Please use the text box below for comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

3. BACKGROUND (page 6, paragraphs 1.1-1.5)

Provides a brief historical context to the economic development of West Lothian which helps explain how settlements established and have developed.

Do you wish to make a comment?

- yes
- no

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4. CONTEXT (page 7, paragraphs 2.1-2.2)

Provides wider context for the LDP in geographic terms and explains how the LDP fits with the Strategic Development Plan (SDP1).

Do you wish to make a comment?

- yes
- no

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5. ROLE AND PURPOSE OF PLAN (page 7, paragraphs 3.1-3.5)

Establishes the role and purpose of the LDP in terms of its being a material consideration in the determination of any planning applications for development in West Lothian and, when adopted by the Council, will replace the West Lothian Local Plan. It also sets out what documents the plan must comply with i.e. the Planning Act (Scotland) 2006 and what documents will accompany the plan i.e. the Action Programme etc.

Do you wish to make a comment?

- yes
- no

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6. VISION STATEMENT AND AIMS (page 8, paragraphs 4.1-4.3)

Establishes the vision for the LDP in terms of outcomes desired over the plan period and identifies the key aims of the plan by individual subject areas i.e. Economic Development & Growth, Community Regeneration, Sustainable Housing Locations, Infrastructure Requirements and Delivery, Town Centres and Retailing, the Natural and Historic Environment, Climate Change and Renewable Energy and Waste and Minerals.

Do you wish to make a comment?

- yes
- no

If you wish to make comments please begin by selecting the relevant sub-section(s) of Vision Statement and Aims from the list below.

- Economic Development and Growth (page 8)
- Community Regeneration (page 8)
- Sustainable Housing Locations (page 9)
- Infrastructure Requirements and Delivery (page 9)
- Town Centres and Retailing (page 9)
- The Natural and Historic Environment (page 9)
- Climate Change and Renewable Energy (page 9)
- Waste and Minerals (page 9)

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Sustainable
Housing
Locations (page
9)

We note that the LDP Vision is in the first instance informed by that of the Strategic Development Plan (SDP) for Edinburgh and South East Scotland. In relation to sustainable housing locations, we also note that the Vision seeks to provide a generous supply of housing land and an effective five year housing land supply at all times. We maintain that it will be crucial in progressing the LDP, to ensure it is compliant with the approved SDP and that in accommodating the growing West Lothian population and anticipated improved employment position, sufficient housing is delivered, timeously and in accordance with SDP requirements.

7. THE SPATIAL STRATEGY (INCLUDING POLICY FRAMEWORK) (page 10, paragraphs 5.1-5.10)

In the context of the Strategic Development Plan (SDP), the LDP identifies West Lothian as being one of thirteen Strategic Development Areas where development will be focused in sustainable locations where infrastructure is either available or can be provided and in locations where there are no environmental constraints.

Do you wish to make a comment?

yes

no

If you wish to make comments please begin by selecting the relevant sub-section(s) of the Spatial Strategy from the list below.

- Economic Development and Growth (page 12, paragraphs 5.11-5.22)
- Flexibility within traditional industrial estates (page 14, paragraphs 5.24-5.25)
- Enterprise Areas (page 17, paragraphs 5.24-5.25)
- Local business opportunities, small business start-ups and working from home (page 17, paragraph 5.26)
- Tourism (page 17, paragraphs 5.27-5.28)
- Promoting community regeneration (page 19, paragraphs 5.29-5.35)
- Housing land requirements for the LDP (page 20, paragraphs 5.36-5.49)
- Effective Housing Land and Generous Supply (page 23, paragraphs 5.50-5.53)
- New Housing Sites and Design (page 24, paragraphs 5.4-5.56)
- Strategic Allocations (including previously identified Core Development Area Allocations) (page 25, paragraphs 5.57-5.61)
- Whitburn/Charette (page 26, paragraph 5.62)
- Linlithgow and Linlithgow Bridge (page 26-27)
- Deans South, Livingston; Area for Comprehensive Re-development (page 27, paragraph 5.68)
- Affordable Housing (page 27, paragraphs 5.69-5.74)
- Accommodation for Gypsies, Travellers and Travelling Show People (page 29, paragraph 5.75)
- Residential Care and Supported Accommodation (page 29, paragraphs 5.76-5.77)
- Infrastructure Requirements and Delivery (page 30, paragraphs 5.78-5.84)
- Providing for Community Needs (page 32, paragraphs 5.85-5.88)
- Education (page 32, paragraphs 5.89-5.92)
- Healthcare Provision (page 33, paragraphs 5.93-5.96)
- Sports Facilities (page 33, paragraphs 5.97-5.101)
- Green Infrastructure and Green Networks (page 34, paragraphs 5.102-5.105)
- Water and Drainage (page 34, paragraphs 5.106-5.107)
- Travel in and around West Lothian (page 34, paragraphs 5.108-5.112)
- Roads (page 35, paragraph 5.113)
- A71 Corridor (page 35, paragraphs 5.114-5.115)
- A801 Corridor (page 35, paragraphs 5.116-5.117)
- A89/A8 (page 35, paragraphs 5.118-5.126)
- Rail (page 37, paragraphs 5.127-5.130)
- Walking and Cycling (page 37, paragraphs 5.131-5.132)
- Town Centres and Retailing (page 39, paragraphs 5.133-5.138)
- Landscape Character and Local Landscape Designations (page 41, paragraphs 5.139-5.143)
- Countryside Belts (page 42, paragraph 5.144)
- Development in the Countryside (page 42, paragraphs 5.145-5.147)
- Lowland Crofting (page 44, paragraphs 5.148-5.152)
- Green Networks, Local Biodiversity Sites and Geodiversity Sites (page 45, paragraphs 5.153-5.155)
- Forestry (page 46, paragraphs 5.156-5.163)
- Union Canal (p.49 paragraphs 5.164-5.165)
- Pentland Hills Regional Park (page 49, paragraphs 5.164-5.165)
- Country Parks (page 50, paragraph 5.169)
- Allotments/Community Growing (page 51, paragraphs 5.170-5.171)
- Temporary/Advance Greening (page 51, paragraphs 5.172-5.174)
- Biodiversity (page 52, paragraphs 5.175-5.180)
- Geodiversity (page 53, paragraph 5.181)
- West Lothian Open Space Strategy (page 53, paragraphs 5.182-5.184)
- Historic and Cultural Environment (page 54, paragraphs 5.185-5.187)
- Conservation Areas (page 55, paragraphs 5.185-5.188)

- Former Bangour Village Hospital, Dechmont (page 56, paragraph 5.189)
- Conservation Area at Abercorn/Hopetoun Estate (page 56, paragraph 5.190)
- Other Areas of Built Heritage and Townscape Value (page 57, paragraphs 5.191-5.199)
- Listed Buildings (page 58, paragraphs 5.185-5.187)
- Historic Gardens and Designed Landscapes (page 59, paragraphs 5.200-5.201)
- Historic Battlefields (page 60, paragraph 5.202)
- Archaeology (page 60, paragraph 5.203)
- Scheduled Monuments (page 60, paragraphs 5.204-5.206)
- Public Art (page 61, paragraphs 5.207-5.208)
- Climate Change Measures (page 62, paragraphs 5.209-5.214)
- Low Carbon Development and Renewable Energy (page 63, paragraphs 5.215-5.221)
- Wind Farms and Wind Turbines (page 65, paragraphs 5.222-5.225)
- Energy and Heat Networks (page 66, paragraphs 5.226-5.229)
- Off-gas Grid Areas and Renewable Heat Requirement for New-build Housing (page 67, paragraphs 5.230-5.232)
- The Water Environment and Flood Risk Management (page 67, paragraphs 5.233-5.239)
- Air Quality and Noise (page 70, paragraphs 5.240-5.242)
- Edinburgh Airport (page 71, paragraph 5.243)
- Noise (page 71, paragraph 5.244)
- Contaminated Land (page 71, paragraphs 5.245-5.246)
- Vacant and Derelict Land (page 72, paragraphs 5.249-5.250)
- Minerals and Waste (page 73, paragraphs 5.251-5.256)
- Site Restoration (page 75, paragraphs 5.257-5.238)
- Unconventional Gas Extraction including Hydraulic Fracking (page 75, paragraph 5.259)
- Waste (page 76, paragraph 5.260)

Please use the text box below for your comments.

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Housing land requirements for the LDP (page 20, paragraphs 5.36-5.49)

We note that West Lothian's population is predicted to increase by nearly 4% by 2020 to 183,000 compared with the projected increase in population for Scotland as a whole of around 3% during the same period. We also note that the number of households in West Lothian is also projected to increase with a 17% increase anticipated between 2012 and 2037. The LDP has been prepared in the context of the SESplan SDP, approved by Scottish Ministers in June 2013, and SPP 2014. We note that the Council acknowledges that to meet the SDP requirements, the level of house completions across the plan area will need to go well above recent rates of housing completions (emphasis added). The LDP spatial strategy continues to support the previously established CDA allocations although it acknowledges that further land allocations for development are also required in order to meet SESplan requirements in full. Despite the above acknowledgements, we have concerns about the Council's continued reliance on sites from the previous Local Plan (2009) which have failed to come forward and deliver new housing and which are simply continued into the new LDP with no guarantee of delivery during the lifetime of the plan. This, despite the Council's acknowledgement that the LDP is running a shortfall of 3,623 units to 2019 which is contrary to Scottish Government policy and SESplan. In this regard, it is considered that there is little merit in the Council continuing to include sites which have been identified in the previous Local Plan (2009) if these sites are still not likely to assist in meeting requirements by 2019. Importantly, the recently published Report of Examination into objections to the Scottish Borders LDP made it clear that sites not likely to come forward, where constraints indicate that development is unlikely to come forward, should be deleted from that plan. The LDP (Appendix 2) identifies 19 housing sites (1,346 units) for the Bathgate settlement which are carried forward from the previous Local Plan. The LDP identifies a total of 10 new housing sites for Bathgate which are new allocations and which are intended to provide 353 units. The new allocations represent only 26% of the overall allocations to the Bathgate settlement. The continued reliance on a majority of sites carried forward from the previous Local Plan does not provide confidence that requirements will be met even during the second period of the plan. It is critical that, in order to ensure compliance with SPP and the maintenance of an effective housing land supply at all times, West Lothian Council identifies additional housing sites that can contribute effectively to the housing land supply and that have a realistic opportunity of coming forward within the necessary timescale (i.e. up to 2019). We maintain that there is a need to revisit the proposed allocation of sites in the LDP, carried forward from the Local Plan, and to replace or augment these with further sites that will be capable of delivering units to meet requirements in the first five year period of the plan. We therefore refer the Council to the site at Sibbalds Brae, Bathgate and respectfully request that this site is identified as a housing site that can contribute to the Housing Land requirement up to 2019 and also to 2024 (Please see table below which demonstrates the effectiveness of this site in accordance with PAII 2/2010: 'Affordable Housing and Housing Land Audits). SESplan Policy 6 Housing Land Flexibility requires each planning authority to maintain a five year effective housing land supply at all times. Even with the reliance on sites in the second period of the LDP, this results in a surplus of only 33 units to 2024 according to the Council. This marginal figure does not provide stakeholders and interested parties with the confidence needed to ensure that the plan will ultimately deliver the necessary housing or provide the necessary supply of effective sites at all times. The Proposed LDP fails to comply with SESplan by not providing sufficient effective housing land in the first period of the plan. It is not appropriate to simply allocate 'sufficient' land up to year 10 rather than the SESplan requirements for 2019 and 2024. We therefore object to the Council's approach to housing land supply applied in the LDP and to the Supply target that the Council sets out in Figure 5: West Lothian Housing Land Supply Target. The Proposed LDP identifies that a new SDP (SDP2) is currently being prepared and is at Main Issues Report stage. A new Housing Needs and Demand Assessment (HNDA2) has recently been published and this will be used to inform the housing land requirement for SDP2. This, according to the Council, includes more up to date housing projections and shows that housing need is expected to be around 40% less. Additionally, the Council reports that HNDA2 identifies that a much higher percentage of housing demand in West Lothian will be for rented housing rather than owner occupied housing. The Proposed Plan (paragraph 5.41) states that the LDP must start to recognise the changing demand for housing both in terms of tenure and scale flagged up by HNDA2. It goes on to state that: '...the most up to date demand figures will be used to calculate the five year housing land requirement in the context of a revised housing land audit process which will compare supply and demand in each sector than as a single figure as has been the case until now.' We would wish to draw the Council's attention to the recently published Report of Examination into objections to the Scottish Borders Council LDP. In this Report of Examination, The Reporter states (Paragraph 24, page 386): 'I note also the Council's reference to the likely reduction in future housing land requirement which appears to be emerging from HNDA2. I am in no doubt, however, that the plan ought to be consistent with the currently approved version of SESplan and its supplementary guidance.' We have strong reservations about the approach being pursued by the Council which we consider is not in accordance with the approved SDP. We therefore object to the Council relying upon HNDA2 to calculate the five year land supply figures for the LDP. As referenced in the recent Scottish Borders LDP Examination report, the LDP must be consistent with SESplan (including its supplementary guidance).

Effective Housing Land and Generous Supply (page 23, paragraphs 5.50-5.53)

We note that West Lothian's population is predicted to increase by nearly 4% by 2020 to 183,000 compared with the projected increase in population for Scotland as a whole of around 3% during the same period. We also note that the number of households in West Lothian is also projected to increase with a 17% increase anticipated between 2012 and 2037. The LDP has been prepared in the context of the SESplan SDP, approved by Scottish Ministers in June 2013, and SPP 2014. We note that the Council acknowledges that to meet the SDP requirements, the level of house completions across the plan area will need to go well above recent rates of housing completions (emphasis added). The LDP spatial strategy continues to support the previously established CDA allocations although it acknowledges that further land allocations for development are also required in order to meet SESplan requirements in full. Despite the above acknowledgements, we have concerns about the Council's continued reliance on sites from the previous Local Plan (2009) which have failed to come forward and deliver new housing and which are simply continued into the new LDP with no guarantee of delivery during the lifetime of the plan. This, despite the Council's acknowledgement that the LDP is running a shortfall of 3,623 units to 2019 which is contrary to Scottish Government policy and SESplan. In this regard, it is considered that there is little merit in the Council continuing to include sites which have been identified in the previous Local Plan (2009) if these sites are still not likely to assist in meeting requirements by 2019. Importantly, the recently published Report of Examination into objections to the Scottish Borders LDP made it clear that sites not likely to come forward, where constraints indicate that development is unlikely to come forward, should be deleted from that plan. The LDP (Appendix 2) identifies 19 housing sites (1,346 units) for the Bathgate settlement which are carried forward from the previous Local Plan. The LDP identifies a total of 10 new housing sites for Bathgate which are new allocations and which are intended to provide 353 units. The new allocations represent only 26% of the overall allocations to the Bathgate settlement. The continued reliance on a majority of sites carried forward from the previous Local Plan does not provide confidence that requirements will be met even during the second period of the plan. It is critical that, in order to ensure compliance with SPP and the maintenance of an effective housing land supply at all times, West Lothian Council identifies additional housing sites that can contribute effectively to the housing land supply and that have a realistic opportunity of coming forward within the necessary timescale (i.e. up to 2019). We maintain that there is a need to revisit the proposed allocation of sites in the LDP, carried forward from the Local Plan, and to replace or augment these with further sites that will be capable of delivering units to meet requirements in the first five year period of the plan. We therefore refer the Council to the site at Sibbalds Brae, Bathgate and respectfully request that this site is identified as a housing site that can contribute to the Housing Land requirement up to 2019 and also to 2024 (Please see table below which demonstrates the effectiveness of this site in accordance with PAII 2/2010: 'Affordable Housing and Housing Land Audits). SESplan Policy 6 Housing Land Flexibility requires each planning authority to maintain a five year effective housing land supply at all times. Even with the reliance on sites in the second period of the LDP, this results in a surplus of only 33 units to 2024 according to the Council. This marginal figure does not provide stakeholders and interested parties with the confidence needed to ensure that the plan will ultimately deliver the necessary housing or provide the necessary supply of effective sites at all times. The Proposed LDP fails to comply with SESplan by not providing sufficient effective housing land in the first period of the plan. It is not appropriate to simply allocate 'sufficient' land up to year 10 rather than the SESplan requirements for 2019 and 2024. We therefore object to the Council's approach to housing land supply applied in the LDP and to the Supply target that the Council sets out in Figure 5: West Lothian Housing Land Supply Target. The Proposed LDP identifies that a new SDP (SDP2) is currently being prepared and is at Main Issues Report stage. A new Housing Needs and Demand Assessment (HNDA2) has recently been published and this will be used to inform the housing land requirement for SDP2. 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New Housing Sites and Design (page 24,

paragraphs 5.4-5.56)

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This, according to the Council, includes more up to date housing projections and shows that housing need is expected to be around 40% less. Additionally, the Council reports that HIIDA2 identifies that a much higher percentage of housing demand in West Lothian will be for rented housing rather than owner occupied housing. The Proposed Plan (paragraph 5.41) states that the LDP must start to recognise the changing demand for housing both in terms of tenure and scale flagged up by HIIDA2. It goes on to state that: '...the most up to date demand figures will be used to calculate the five year housing land requirement in the context of a revised housing land audit process which will compare supply and demand in each sector than as a single figure as has been the case until now.' We would wish to draw the Council's attention the recently published Report of Examination into objections to the Scottish Borders Council LDP. 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Strategic Allocations (including previously identified Core Development Area Allocations) (page 25, paragraphs 5.57-5.61)

We note that West Lothian's population is predicted to increase by nearly 4% by 2020 to 183,000 compared with the projected increase in population for Scotland as a whole of around 3% during the same period. We also note that the number of households in West Lothian is also projected to increase with a 17% increase anticipated between 2012 and 2037. The LDP has been prepared in the context of the SESplan SDP, approved by Scottish Ministers in June 2013, and SPP 2014. We note that the Council acknowledges that to meet the SDP requirements, the level of house completions across the plan area will need to go well above recent rates of housing completions (emphasis added). The LDP spatial strategy continues to support the previously established CDA allocations although it acknowledges that further land allocations for development are also required in order to meet SESplan requirements in full. Despite the above acknowledgements, we have concerns about the Council's continued reliance on sites from the previous Local Plan (2009) which have failed to come forward and deliver new housing and which are simply continued into the new LDP with no guarantee of delivery during the lifetime of the plan. This, despite the Council's acknowledgement that the LDP is running a shortfall of 3,623 units to 2019 which is contrary to Scottish Government policy and SESplan. In this regard, it is considered that there is little merit in the Council continuing to include sites which have been identified in the previous Local Plan (2009) if these sites are still not likely to assist in meeting requirements by 2019. Importantly, the recently published Report of Examination into objections to the Scottish Borders LDP made it clear that sites not likely to come forward, where constraints indicate that development is unlikely to come forward, should be deleted from that plan. The LDP (Appendix 2) identifies 19 housing sites (1,346 units) for the Bathgate settlement which are carried forward from the previous Local Plan. The LDP identifies a total of 10 new housing sites for Bathgate which are new allocations and which are intended to provide 353 units. The new allocations represent only 26% of the overall allocations to the Bathgate settlement. The continued reliance on a majority of sites carried forward from the previous Local Plan does not provide confidence that requirements will be met even during the second period of the plan. It is critical that, in order to ensure compliance with SPP and the maintenance of an effective housing land supply at all times, West Lothian Council identifies additional housing sites that can contribute effectively to the housing land supply and that have a realistic opportunity of coming forward within the necessary timescale (i.e. up to 2019). We maintain that there is a need to revisit the proposed allocation of sites in the LDP, carried forward from the Local Plan, and to replace or augment these with further sites that will be capable of delivering units to meet requirements in the first five year period of the plan. We therefore refer the Council to the site at Sibbalds Brae, Bathgate and respectfully request that this site is identified as a housing site that can contribute to the Housing Land requirement up to 2019 and also to 2024 (Please see table below which demonstrates the effectiveness of this site in accordance with PAH 2/2010: 'Affordable Housing and Housing Land Audits'). SESplan Policy 6 Housing Land Flexibility requires each planning authority to maintain a five year effective housing land supply at all times. Even with the reliance on sites in the second period of the LDP, this results in a surplus of only 33 units to 2024 according to the Council. This marginal figure does not provide stakeholders and interested parties with the confidence needed to ensure that the plan will ultimately deliver the necessary housing or provide the necessary supply of effective sites at all times. The Proposed LDP fails to comply with SESplan by not providing sufficient effective housing land in the first period of the plan. It is not appropriate to simply allocate 'sufficient' land up to year 10 rather than the SESplan requirements for 2019 and 2024. We therefore object to the Council's approach to housing land supply applied in the LDP and to the Supply target that the Council sets out in Figure 5: West Lothian Housing Land Supply Target. The Proposed LDP identifies that a new SDP (SDP2) is currently being prepared and is at Main Issues Report stage. A new Housing Needs and Demand Assessment (HIIDA2) has recently been published and this will be used to inform the housing land requirement for SDP2. This, according to the Council, includes more up to date housing projections and shows that housing need is expected to be around 40% less. Additionally, the Council reports that HIIDA2 identifies that a much higher percentage of housing demand in West Lothian will be for rented housing rather than owner occupied housing. The Proposed Plan (paragraph 5.41) states that the LDP must start to recognise the changing demand for housing both in terms of tenure and scale flagged up by HIIDA2. It goes on to state that: '...the most up to date demand figures will be used to calculate the five year housing land requirement in the context of a revised housing land audit process which will compare supply and demand in each sector than as a single figure as has been the case until now.' We would wish to draw the Council's attention the recently published Report of Examination into objections to the Scottish Borders Council LDP. In this Report of Examination, The Reporter states (Paragraph 24, page 386): 'I note also the Council's reference to the likely reduction in future housing land requirement which appears to be emerging from HIIDA2. I am in no doubt, however, that the plan ought to be consistent with the currently approved version of SESplan and its supplementary guidance.' We have strong reservations about the approach being pursued by the Council which we consider is not in accordance with the approved SDP. We therefore object to the Council relying upon HIIDA2 to calculate the five year land supply figures for the LDP. As referenced in the recent Scottish Borders LDP Examination report, the LDP must be consistent with SESplan (including its supplementary guidance).

Infrastructure Requirements and Delivery (page 30,

paragraphs
5.78-5.84)

We note that West Lothian's population is predicted to increase by nearly 4% by 2020 to 183,000 compared with the projected increase in population for Scotland as a whole of around 3% during the same period. We also note that the number of households in West Lothian is also projected to increase with a 17% increase anticipated between 2012 and 2037. The LDP has been prepared in the context of the SESplan SDP, approved by Scottish Ministers in June 2013, and SPP 2014. We note that the Council acknowledges that to meet the SDP requirements, the level of house completions across the plan area will need to go well above recent rates of housing completions (emphasis added). The LDP spatial strategy continues to support the previously established CDA allocations although it acknowledges that further land allocations for development are also required in order to meet SESplan requirements in full. Despite the above acknowledgements, we have concerns about the Council's continued reliance on sites from the previous Local Plan (2009) which have failed to come forward and deliver new housing and which are simply continued into the new LDP with no guarantee of delivery during the lifetime of the plan. This, despite the Council's acknowledgement that the LDP is running a shortfall of 3,623 units to 2019 which is contrary to Scottish Government policy and SESplan. In this regard, it is considered that there is little merit in the Council continuing to include sites which have been identified in the previous Local Plan (2009) if these sites are still not likely to assist in meeting requirements by 2019. Importantly, the recently published Report of Examination into objections to the Scottish Borders LDP made it clear that sites not likely to come forward, where constraints indicate that development is unlikely to come forward, should be deleted from that plan. The LDP (Appendix 2) identifies 19 housing sites (1,346 units) for the Bathgate settlement which are carried forward from the previous Local Plan. The LDP identifies a total of 10 new housing sites for Bathgate which are new allocations and which are intended to provide 353 units. The new allocations represent only 26% of the overall allocations to the Bathgate settlement. The continued reliance on a majority of sites carried forward from the previous Local Plan does not provide confidence that requirements will be met even during the second period of the plan. It is critical that, in order to ensure compliance with SPP and the maintenance of an effective housing land supply at all times, West Lothian Council identifies additional housing sites that can contribute effectively to the housing land supply and that have a realistic opportunity of coming forward within the necessary timescale (i.e. up to 2019). We maintain that there is a need to revisit the proposed allocation of sites in the LDP, carried forward from the Local Plan, and to replace or augment these with further sites that will be capable of delivering units to meet requirements in the first five year period of the plan. We therefore refer the Council to the site at Sibbalds Brae, Bathgate and respectfully request that this site is identified as a housing site that can contribute to the Housing Land requirement up to 2019 and also to 2024 (Please see table below which demonstrates the effectiveness of this site in accordance with PAH 2/2010: 'Affordable Housing and Housing Land Audits'). SESplan Policy 6 Housing Land Flexibility requires each planning authority to maintain a five year effective housing land supply at all times. Even with the reliance on sites in the second period of the LDP, this results in a surplus of only 33 units to 2024 according to the Council. This marginal figure does not provide stakeholders and interested parties with the confidence needed to ensure that the plan will ultimately deliver the necessary housing or provide the necessary supply of effective sites at all times. The Proposed LDP fails to comply with SESplan by not providing sufficient effective housing land in the first period of the plan. It is not appropriate to simply allocate 'sufficient' land up to year 10 rather than the SESplan requirements for 2019 and 2024. We therefore object to the Council's approach to housing land supply applied in the LDP and to the Supply target that the Council sets out in Figure 5: West Lothian Housing Land Supply Target. The Proposed LDP identifies that a new SDP (SDP2) is currently being prepared and is at Main Issues Report stage. A new Housing Needs and Demand Assessment (HIIDA2) has recently been published and this will be used to inform the housing land requirement for SDP2. This, according to the Council, includes more up to date housing projections and shows that housing need is expected to be around 40% less. Additionally, the Council reports that HIIDA2 identifies that a much higher percentage of housing demand in West Lothian will be for rented housing rather than owner occupied housing. The Proposed Plan (paragraph 5.41) states that the LDP must start to recognise the changing demand for housing both in terms of tenure and scale flagged up by HIIDA2. It goes on to state that: '...the most up to date demand figures will be used to calculate the five year housing land requirement in the context of a revised housing land audit process which will compare supply and demand in each sector than as a single figure as has been the case until now.' We would wish to draw the Council's attention the recently published Report of Examination in to objections to the Scottish Borders Council LDP. In this Report of Examination, The Reporter states (Paragraph 24, page 386): 'I note also the Council's reference to the likely reduction in future housing land requirement which appears to be emerging from HIIDA2. I am in no doubt, however, that the plan ought to be consistent with the currently approved version of SESplan and its supplementary guidance.' We have strong reservations about the approach being pursued by the Council which we consider is not in accordance with the approved SDP. We therefore object to the Council relying upon HIIDA2 to calculate the five year land supply figures for the LDP. As referenced in the recent Scottish Borders LDP Examination report, the LDP must be consistent with SESplan (including its supplementary guidance).

Roads (page
35, paragraph
5.113)

We note that West Lothian's population is predicted to increase by nearly 4% by 2020 to 183,000 compared with the projected increase in population for Scotland as a whole of around 3% during the same period. We also note that the number of households in West Lothian is also projected to increase with a 17% increase anticipated between 2012 and 2037. The LDP has been prepared in the context of the SESplan SDP, approved by Scottish Ministers in June 2013, and SPP 2014. We note that the Council acknowledges that to meet the SDP requirements, the level of house completions across the plan area will need to go well above recent rates of housing completions (emphasis added). The LDP spatial strategy continues to support the previously established CDA allocations although it acknowledges that further land allocations for development are also required in order to meet SESplan requirements in full. Despite the above acknowledgements, we have concerns about the Council's continued reliance on sites from the previous Local Plan (2009) which have failed to come forward and deliver new housing and which are simply continued into the new LDP with no guarantee of delivery during the lifetime of the plan. This, despite the Council's acknowledgement that the LDP is running a shortfall of 3,623 units to 2019 which is contrary to Scottish Government policy and SESplan. In this regard, it is considered that there is little merit in the Council continuing to include sites which have been identified in the previous Local Plan (2009) if these sites are still not likely to assist in meeting requirements by 2019. Importantly, the recently published Report of Examination into objections to the Scottish Borders LDP made it clear that sites not likely to come forward, where constraints indicate that development is unlikely to come forward, should be deleted from that plan. 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We maintain that there is a need to revisit the proposed allocation of sites in the LDP, carried forward from the Local Plan, and to replace or augment these with further sites that will be capable of delivering units to meet requirements in the first five year period of the plan. We therefore refer the Council to the site at Sibbalds Brae, Bathgate and respectfully request that this site is identified as a housing site that can contribute to the Housing Land requirement up to 2019 and also to 2024 (Please see table below which demonstrates the effectiveness of this site in accordance with PAH 2/2010: 'Affordable Housing and Housing Land Audits'). SESplan Policy 6 Housing Land Flexibility requires each planning authority to maintain a five year effective housing land supply at all times. Even with the reliance on sites in the second period of the LDP, this results in a surplus of only 33 units to 2024 according to the Council. 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Countryside
Belts (page
42, paragraph
5.144)

We note that West Lothian's population is predicted to increase by nearly 4% by 2020 to 183,000 compared with the projected increase in population for Scotland as a whole of around 3% during the same period. We also note that the number of households in West Lothian is also projected to increase with a 17% increase anticipated between 2012 and 2037. The LDP has been prepared in the context of the SESplan SDP, approved by Scottish Ministers in June 2013, and SPP 2014. We note that the Council acknowledges that to meet the SDP requirements, the level of house completions across the plan area will need to go well above recent rates of housing completions (emphasis added). The LDP spatial strategy continues to support the previously established CDA allocations although it acknowledges that further land allocations for development are also required in order to meet SESplan requirements in full. 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This marginal figure does not provide stakeholders and interested parties with the confidence needed to ensure that the plan will ultimately deliver the necessary housing or provide the necessary supply of effective sites at all times. The Proposed LDP fails to comply with SESplan by not providing sufficient effective housing land in the first period of the plan. It is not appropriate to simply allocate 'sufficient' land up to year 10 rather than the SESplan requirements for 2019 and 2024. We therefore object to the Council's approach to housing land supply applied in the LDP and to the Supply target that the Council sets out in Figure 5: West Lothian Housing Land Supply Target. The Proposed LDP identifies that a new SDP (SDP2) is currently being prepared and is at Main Issues Report stage. A new Housing Needs and Demand Assessment (HIDA2) has recently been published and this will be used to inform the housing land requirement for SDP2. This, according to the Council, includes more up to date housing projections and shows that housing need is expected to be around 40% less. Additionally, the Council reports that HIDA2 identifies that a much higher percentage of housing demand in West Lothian will be for rented housing rather than owner occupied housing. The Proposed Plan (paragraph 5.41) states that the LDP must start to recognise the changing demand for housing both in terms of tenure and scale flagged up by HIDA2. It goes on to state that: '...the most up to date demand figures will be used to calculate the five year housing land requirement in the context of a revised housing land audit process which will compare supply and demand in each sector than as a single figure as has been the case until now.' We would wish to draw the Council's attention to the recently published Report of Examination in to objections to the Scottish Borders Council LDP. In this Report of Examination, The Reporter states (Paragraph 24, page 386): 'I note also the Council's reference to the likely reduction in future housing land requirement which appears to be emerging from HIDA2. I am in no doubt, however, that the plan ought to be consistent with the currently approved version of SESplan and its supplementary guidance.' We have strong reservations about the approach being pursued by the Council which we consider is not in accordance with the approved SDP. We therefore object to the Council relying upon HIDA2 to calculate the five year land supply figures for the LDP. As referenced in the recent Scottish Borders LDP Examination report, the LDP must be consistent with SESplan (including its supplementary guidance).

8. DEVELOPMENT PROPOSAL BY SETTLEMENT (page 79)

Provides details of development proposals which are supported by the LDP in each town and village across West Lothian and assigns each one a unique reference for ease of identification.

Do you wish to make a comment?

- yes
 no

If you wish to make comments please begin by selecting the relevant Settlement(s) from the list below.

- Addiewell & Loganlea (page 79)
- Armadale (page 80)
- Bathgate (page 81)
- Blackburn (page 82)
- Blackridge (page 83)
- Breich (page 83)
- Bridgehouse & Bridgecastle (page 83)
- Bridgend (page 83)
- Broxburn (page 84)
- Burnside (page 84)
- Dechmont & Bangour (page 85)
- East Calder (page 85)
- East Whitburn (page 86)
- Ecclesmachan (page 86)
- Fauldhouse (page 86)
- Greenrigg (page 86)
- Kirknewton (page 87)
- Landward area (page 87)
- Linlithgow & Linlithgow Bridge (page 89)
- Livingston (page 90)
- Longridge (page 93)
- Mid Calder (page 93)
- Hewton and Woodend (page 93)
- Philpstoun/East & West Philpstoun/Old Philpstoun (page 93)
- Polbeth (page 93)
- Pumpherston (page 93)
- Seafield (page 93)
- Stoneyburn/Bents (page 94)
- Threemiletown (page 94)
- Torphichen (page 94)
- Uphall (page 94)
- Uphall Station (page 94)
- West Calder & Harburn (page 95)
- Westfield (page 95)
- Whitburn (page 96)
- Wilkieston (page 97)
- Winchburgh (page 97)

Please enter site reference(s)/proposals reference (as appropriate) and location/site address below.

Site Reference/ Location / Site Address can be found in the relevant Settlement Statement

	site reference	location/ site address
Bathgate (page 81)	EOI-0127	Sibbalds Brae, Bathgate

Please use the text box below for comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Comment

Bathgate
(page
81)

LDP Appendix 2: Schedule of Housing Sites - Sibbalds Brae, Bathgate: The Sibbalds Brae site at Bathgate has an indicative capacity of 750 units. This would be a mixed use housing led development site delivering a sustainable new neighbourhood including for a range of house types and tenures, a new double stream primary school, local retail provision to service the new neighbourhood (with potential for medical centre/ community building) as well as open space and green networks linking with the wider area. The allocation of the site for residential development would assist the Council in meeting housing requirements and maintaining the necessary continuous, minimum five year supply of effective housing land, without comprising areas important for their qualities in respect of landscape, the natural and built environment. The proposed development can assist in meeting affordable housing contributions in accordance with Policy Hou5 Affordable Housing. Bathgate is identified as a Priority 2 area with a 15% affordable housing requirement and the proposed development provides for provision of affordable housing as an integral part of the proposed new neighbourhood. The site has distinct advantages for the provision of new residential development, which can be summarised as follows: • The site is well located in relation to existing residential development within Bathgate; • Development of the site for housing would assist the Council in ensuring that it meets its obligation to provide a continuous minimum 5 year effective housing land supply; • The site is easily accessible by existing local bus services providing connections to Bathgate town centre and beyond; • The site can be easily integrated into existing and potential footpath/ cycleway networks; • Local community facilities are within walking distance; • Vehicular and pedestrian access to and from the site can be adequately provided; • Provision of range of housing types and mix of tenures including affordable housing; • Provision of associated infrastructure, including much needed primary school provision; • Delivery of a strong landscape framework to ensure, in perpetuity, a landscape corridor to provide visual and physical separation between Bathgate and the eastern edge of Armadale; • The ability to 'round off' the settlement edge in the south west corner; • Retention of the right of way / core path through the southern part of the site and provided with a positive setting; and • Recreational, ecological and hydrological links with wider green infrastructure network to the east of the site. The site is surrounded by housing to the north and east with further residential development in the southern part of the site at Whiteside farm steadings. There are also employment and housing sites immediately south of the site. The development as shown in the accompanying masterplan integrates with these developments and provides for a natural rounding off of the settlement on the western edge. The provision of a robust landscape framework as part of the proposals protects the settlement edge and secures a permanent separation/ green corridor to safeguard against coalescence with Armadale to the west. Effectiveness of the Site The Scottish Government's first and foremost priority in relation to housing delivery is to plan for a generous and effective land supply, ensuring flexibility within the development plan in recognition of present economic times as outlined in Scottish Planning Policy (SPP). SPP promotes the provision of a range of effective housing sites (Paragraph 119, Page 29) as well as the provision of a 'generous supply of land for each housing market area within the plan area to support the achievement of the housing land requirement across all tenures, maintaining at least a 5-year supply of effective housing at all time' (Paragraph 110, Page 27). The requirement to maintain an effective housing land supply as set out in SPP is complemented by PAH 2/2010: 'Affordable Housing and Housing Land Audits'. This sets out criteria to identify housing sites that can be successfully brought forward through the planning system (PAH 2/2010, Paragraph 55, Page 17). For the purposes of this LDP submission, the seven specified criteria, outlined in PAH 2/2010, have been used to assess the effectiveness of the Sibbalds Brae site for housing, as detailed on the following page. Using the seven criteria of effectiveness defined in PAH 2/2010, it is clear that the Site is effective and is therefore capable of delivering housing units on-site in the short term. We therefore respectfully request that the Sibbalds Brae site (as identified in the attached Site Plan) is identified as a housing allocation in the LDP and included as a Housing site in the Schedule of Housing Sites in Appendix Two of the LDP. The LDP advises that the delivery of housing sites is incumbent upon the availability of infrastructure. Where there is an infrastructure constraint, such as education capacity, this will require to be addressed by housing providers in the first instance. In light of the above, the LDP advises that it is imperative that appropriate sites can come forward where there is market demand and infrastructure can be delivered. Hallam's site at Sibbalds Brae is located in a market area where there is strong demand. The infrastructure requirements can be addressed and development can take place quickly, thus contributing units in the first period of the plan and helping to maintain a minimum 5 year land supply at all times. The Sibbalds Brae site could deliver units relatively quickly in the early part of the plan period and contribute to the first five year period. Whilst numbers would not be to a level which would merit a new school from day one, there is scope for the school to be progressed in tandem with development and for school completion by the time a specific number of houses have been built (threshold to be agreed). The Council provided pitches for the travelling community in an area on the northern edge of the Sibbalds Brae site from the early 1990s. However, the site is no longer operational for this use and surplus to Council requirements and Hallam's proposals include for the delivery of a new non-denominational primary school on this land (subject to discussion and agreement with the Council) at no cost to the public purse. However, should it be considered necessary the school could be located within the site owned by Hallam. We note the development proposals identified in the LDP for each individual settlement across the Council area. The LDP identifies Boghall, Simpsons and St Mary's Primary Schools as being subject of extensions. Similarly, Bathgate Academy is also proposed as being subject to an extension. We understand that schools that currently serve the site include Windyknowe primary school, St Mary's, Bathgate denominational primary school, Armadale Academy Secondary School and St Kentigern's Academy denominational School. Whilst there are current education capacity issues affecting Bathgate and Armadale, we note that the Reporter in the Appeal (Ref: PPP-400-2044) in 2014 for proposed residential development on land within the Sibbalds Brae site concluded that educational constraints relating to secondary school and denominational primary school provision serving western areas of Bathgate were not insurmountable. Hallam's proposals include for the delivery of a new non-denominational primary school on the site of the former travelling people's site, immediately north of the site (subject to discussion and agreement with the Council). This school would be provided by Hallam and at no cost to the public purse. This would not only serve new residents, but could help to alleviate difficulties in other areas including at Windyknowe primary school and also in the Armadale area. The provision of a double stream primary school immediately adjacent the site and funded by the development would ensure there was no impact on existing primary schools in the area. The provision of a double stream primary school in this location also has the potential to provide the Council's educational estate with some flexibility and its provision could benefit the existing community. As stated above, we question the continued allocation of sites that have been carried forward from the previous Local Plan and that will still not assist in meeting housing land requirements in the first five year period of the LDP. We note that there are options for extending capacity at the secondary level for LDP sites. We maintain that the site should be included as an allocation and that this could provide a proportionate developer contribution towards an extension at secondary school level.

9. APPENDICES (page 99)

A number of appendices are included at the end of the LDP which provides additional detail on specific elements of the Proposed Plan.

Do you wish to make a comment?

- yes
 no

If you wish to make comments please begin by selecting the relevant Appendix(es) of the Proposed Plan from the list below.

- Appendix 1 - Employment Land Allocations (page 99)
 Appendix 2 - Schedule of Housing Sites / Site Delivery Requirements (page 119)
 Appendix 3 - Schedule of Land Ownership (page 259)
 Appendix 4 - LDP Supplementary Guidance (SG) and Planning Guidance (PG) (page 265)
 Appendix 5 - List of Policies (page 273)
 Appendix 6 - List of Proposals (page 275)

Please use the text box below for your comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Appendix 2 -
Schedule of
Housing
Sites / Site
Delivery
Requirements
(page 119)

The Sibbalds Brae site at Bathgate has an indicative capacity of 750 units. This would be a mixed use housing led development site delivering a sustainable new neighbourhood including for a range of house types and tenures, a new double stream primary school, local retail provision to service the new neighbourhood (with potential for medical centre/ community building) as well as open space and green networks linking with the wider area. The allocation of the site for residential development would assist the Council in meeting housing requirements and maintaining the necessary continuous, minimum five year supply of effective housing land, without comprising areas important for their qualities in respect of landscape, the natural and built environment. The proposed development can assist in meeting affordable housing contributions in accordance with Policy Hou5 Affordable Housing. Bathgate is identified as a Priority 2 area with a 15% affordable housing requirement and the proposed development provides for provision of affordable housing as an integral part of the proposed new neighbourhood. The site has distinct advantages for the provision of new residential development, which can be summarised as follows:

- The site is well located in relation to existing residential development within Bathgate;
- Development of the site for housing would assist the Council in ensuring that it meets its obligation to provide a continuous minimum 5 year effective housing land supply;
- The site is easily accessible by existing local bus services providing connections to Bathgate town centre and beyond;
- The site can be easily integrated into existing and potential footpath/ cycleway networks;
- Local community facilities are within walking distance;
- Vehicular and pedestrian access to and from the site can be adequately provided;
- Provision of range of housing types and mix of tenures including affordable housing;
- Provision of associated infrastructure, including much needed primary school provision;
- Delivery of a strong landscape framework to ensure, in perpetuity, a landscape corridor to provide visual and physical separation between Bathgate and the eastern edge of Armadale;
- The ability to 'round off' the settlement edge in the south west corner;
- Retention of the right of way / core path through the southern part of the site and provided with a positive setting; and
- Recreational, ecological and hydrological links with wider green infrastructure network to the east of the site.

The site is surrounded by housing to the north and east with further residential development in the southern part of the site at Whiteside farm steadings. There are also employment and housing sites immediately south of the site. The development as shown in the accompanying masterplan integrates with these developments and provides for a natural rounding off of the settlement on the western edge. The provision of a robust landscape framework as part of the proposals protects the settlement edge and secures a permanent separation/ green corridor to safeguard against coalescence with Armadale to the west. Effectiveness of the Site The Scottish Government's first and foremost priority in relation to housing delivery is to plan for a generous and effective land supply, ensuring flexibility within the development plan in recognition of present economic times as outlined in Scottish Planning Policy (SPP). SPP promotes the provision of a range of effective housing sites (Paragraph 119, Page 29) as well as the provision of a 'generous supply of land for each housing market area within the plan area to support the achievement of the housing land requirement across all tenures, maintaining at least a 5-year supply of effective housing at all time' (Paragraph 110, Page 27). The requirement to maintain an effective housing land supply as set out in SPP is complemented by PAII 2/2010: 'Affordable Housing and Housing Land Audits'. This sets out criteria to identify housing sites that can be successfully brought forward through the planning system (PAII 2/2010, Paragraph 55, Page 17). For the purposes of this LDP submission, the seven specified criteria, outlined in PAII 2/2010, have been used to assess the effectiveness of the Sibbalds Brae site for housing, as detailed on the following page. Using the seven criteria of effectiveness defined in PAII 2/2010, it is clear that the Site is effective and is therefore capable of delivering housing units on-site in the short term. We therefore respectfully request that the Sibbalds Brae site (as identified in the attached Site Plan) is identified as a housing allocation in the LDP and included as a Housing site in the Schedule of Housing Sites in Appendix Two of the LDP. The LDP advises that the delivery of housing sites is incumbent upon the availability of infrastructure. Where there is an infrastructure constraint, such as education capacity, this will require to be addressed by housing providers in the first instance. In light of the above, the LDP advises that it is imperative that appropriate sites can come forward where there is market demand and infrastructure can be delivered. Hallam's site at Sibbalds Brae is located in a market area where there is strong demand. The infrastructure requirements can be addressed and development can take place quickly, thus contributing units in the first period of the plan and helping to maintain a minimum 5 year land supply at all times. The Sibbalds Brae site could deliver units relatively quickly in the early part of the plan period and contribute to the first five year period. Whilst numbers would not be to a level which would merit a new school from day one, there is scope for the school to be progressed in tandem with development and for school completion by the time a specific number of houses have been built (threshold to be agreed). The Council provided pitches for the travelling community in an area on the northern edge of the Sibbalds Brae site from the early 1990s. However, the site is no longer operational for this use and surplus to Council requirements and Hallam's proposals include for the delivery of a new non-denominational primary school on this land (subject to discussion and agreement with the Council) at no cost to the public purse. However, should it be considered necessary the school could be located within the site owned by Hallam. We note the development proposals identified in the LDP for each individual settlement across the Council area. The LDP identifies Boghall, Simpsons and St Mary's Primary Schools as being subject of extensions. Similarly, Bathgate Academy is also proposed as being subject to an extension. We understand that schools that currently serve the site include Windyknowe primary school, St Mary's, Bathgate denominational primary school, Armadale Academy Secondary School and St Kentigern's Academy denominational School. Whilst there are current education capacity issues affecting Bathgate and Armadale, we note that the Reporter in the Appeal (Ref: PPP-400-2044) in 2014 for proposed residential development on land within the Sibbalds Brae site concluded that educational constraints relating to secondary school and denominational primary school provision serving western areas of Bathgate were not insurmountable. Hallam's proposals include for the delivery of a new non-denominational primary school on the site of the former travelling people's site, immediately north of the site (subject to discussion and agreement with the Council). This school would be provided by Hallam and at no cost to the public purse. This would not only serve new residents, but could help to alleviate difficulties in other areas including at Windyknowe primary school and also in the Armadale area. The provision of a double stream primary school immediately adjacent the site and funded by the development would ensure there was no impact on existing primary schools in the area. The provision of a double stream primary school in this location also has the potential to provide the Council's educational estate with some flexibility and its provision could benefit the existing community. As stated above, we question the continued allocation of sites that have been carried forward from the previous Local Plan and that will still not assist in meeting housing land requirements in the first five year period of the LDP. We note that there are options for extending capacity at the secondary level for LDP sites. We maintain that the site should be included as an allocation and that this could provide a proportionate developer contribution towards an extension at secondary school level. Development Proposals by Settlement - Bathgate: We respectfully request that new primary school provision is included as part of the Development Proposals for Bathgate (Chapter Six) to serve the proposed development at Sibbalds Brae and potentially the surrounding area. Accordingly, reference should be made in the table entitled 'Other Developments' to primary school provision. Countryside Belt Designation We note that the West Lothian Local Plan (2009) identified the area covering the site as an Area of Special Landscape Control (ASLC) and also Countryside Belt. However, a review carried out in 2013 into local landscape designations in West Lothian recommended that the area covering the site was not taken forward for consideration as a Special Landscape Area as part of the emerging LDP. This change took place despite the fact that other areas of Special Landscape Control were taken forward and are now identified in the emerging LDP as Special Landscape Areas. Importantly, the Reporter who dealt with the Appeal (Ref: PPP-400-2044) in 2014 for proposed residential development on land within the site commented that the character of the landscape in the vicinity of the appeal site is '...attractive, albeit not exceptional.' The site is now shown as part of the Countryside Belt in the Proposed LDP. According to the Proposed LDP, Countryside Belts are spatial designations for the purposes of controlling urban spread into the countryside. A key purpose is to maintain the identity of towns by avoiding coalescence. Protecting the setting of settlements is another important purpose of Countryside Belts and they are to provide access to informal green space. There are a number of urbanising influences in this area including the recent Manor Wood housing to the north, the development of new homes at Whiteside Farm in the southern part of the site and the residential and employment uses that occur along the southern edge of the site extending the settlement boundary further west. This string of developments/ uses effectively incorporate development into an area of Countryside. There is an opportunity to integrate these developments with the wider proposals at Sibbalds Brae which will achieve a robust settlement edge whilst providing much needed new housing. It should be noted that there would be no coalescence between Bathgate and Armadale (physical or visual) as a result of the proposed development and a robust landscape corridor, to the west of the areas of built development, can be delivered in perpetuity to the benefit of existing and new residents with existing and proposed landscape features brought under positive ongoing management. Whilst amendment to the Countryside Belt, to the west of Bathgate's settlement edge, is requested in order to accommodate development at the site, great effort has been made in terms of designing development proposals that work with the landscape and that incorporate existing features as part of a cohesive landscape framework. This includes for enhanced recreational, ecological and hydrological linkages. Accordingly, existing policy woodland is to be retained as an integral element of the proposed development. Additional woodland planting is provided to offset the loss of some trees. Within the development areas, mature trees will be integrated into the layout as way-markers, features and for public making within informal and formal open space. The proposals for the site provide potential for increased levels of accessibility and public enjoyment of the area, and securing the long-term management of the retained existing woodland and mature trees, and additional woodland planting. We note the identification of land to the east of the site within the settlement which is identified as land safeguarded for open space and our proposals take cognisance of this. We maintain that the site at Sibbalds Brae should be excluded from the Countryside Belt and included as part of the settlement boundary. The Masterplan proposals submitted ensure there would be no coalescence between Armadale and Bathgate and that a robust landscape corridor can be provided and maintained in perpetuity on the western side of the site, between Bathgate and Armadale to the benefit of both communities. We therefore object to the identification of Countryside Belt covering the Sibbalds Brae site and request that the site is included within the settlement boundary and excluded from the Countryside Belt designation on the LDP Proposals Maps. Proposals Map 1 - West Lothian and Map 4 - Bathgate We respectfully request that the settlement boundary for Bathgate is amended on Proposals Maps 1 and 4 of the Proposed Local Development Plan to include the Sibbalds Brae site, owned by Hallam Land Management Ltd, as part of the settlement.

Appendix 5 -
List of
Policies (page
273)

Policy Hou1 Allocated Housing Sites: To accord with Scottish Government Policy, the second paragraph in Policy Hou1 should be rephrased by inserting the words 'at all times' after 'supply of housing land'. The sentence should read as follows: '...to ensure that an effective 5 year supply of housing land at all times is maintained over the plan period, proposals for uses other than housing....'

10. GLOSSARY (page 280)

An explanation of unfamiliar terms or expressions used in the LDP is provided to assist understanding of the document.

Do you wish to make a comment?

- yes
 no

Please use the text box below for comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

11. PROPOSALS MAPS

The LDP comprises a series of five maps which define settlement boundaries and illustrate land use zonings.

Do you wish to make a comment?

- yes
 no

If you wish to make comments please begin by selecting the relevant Proposals Maps from the list below.

- Proposals Map 1 - West Lothian
 Proposals Map 2 - Linlithgow & Broxburn Area
 Proposals Map 3 - Livingston Area
 Proposals Map 4 - Bathgate Area
 Proposals Map 5 - Villages

Please use the text box below for your comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Proposals Map
4 - Bathgate
Area

Proposals Map 1 - West Lothian and Map 4 - Bathgate We respectfully request that the settlement boundary for Bathgate is amended on Proposals Maps 1 and 4 of the Proposed Local Development Plan to include the Sibbalds Brae site, owned by Hallam Land Management Ltd, as part of the settlement.

12. ACCOMPANYING DOCUMENTS

Alongside the LDP is a suite of documents which are required by statute as part of the preparation and supporting evidence for the LDP.

Do you wish to make a comment?

- yes
 no

If you wish to make comments please begin by selecting the relevant Accompanying Documents from the list below.

- Strategic Environmental Assessment (SEA) Environmental Report.
 Equalities & Human Rights Impact Assessment (EQHRIA).
 Strategic Flood Risk Assessment (SFRA).
 Habitats Regulations Appraisal.
 Transport Appraisal (TA).
 Action Programme.

Please use the text box below for your comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Strategic Environmental Assessment (SEA) Environmental Report.	<input type="text"/>
Equalities & Human Rights Impact Assessment (EQHRIA).	<input type="text"/>
Strategic Flood Risk Assessment (SFRA).	<input type="text"/>
Habitats Regulations Appraisal.	<input type="text"/>
Transport Appraisal (TA).	<input type="text"/>
Action Programme.	<input type="text"/>

13. ADDITIONAL COMMENTS

Do you wish to submit any additional comments on the LDP?

- yes
 no

Please use the text box below for your additional comments on the LDP.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Before pressing the submit button please review your submission and make any changes. Once you have pressed SUBMIT you will be unable to go back to the survey.

Once we have received your submission we will send you a copy for your records. This could take up to 5 working days. If you do not receive a copy in that time please contact the Customer Service Centre.

CONFIRMATION OF YOUR PARTICIPATION

We will send you an email notification as soon as your survey is submitted.

Please enter your email address below.