



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

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.

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

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.

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

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.

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)

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.

Economic Development and Growth (page 8)	<input type="checkbox"/>
Community Regeneration (page 8)	<input type="checkbox"/>
Sustainable Housing Locations (page 9)	<input type="checkbox"/>
Infrastructure Requirements and Delivery (page 9)	<input type="checkbox"/>
Town Centres and Retailing (page 9)	<input type="checkbox"/>
The Natural and Historic Environment (page 9)	<input type="checkbox"/>
Climate Change and Renewable Energy (page 9)	<input type="checkbox"/>
Waste and Minerals (page 9)	<input type="checkbox"/>

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.

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.

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

This representation seeks the allocation of site for housing to the north of Bathgate Golf Club. The site is approximately 7 acres in area (2.53 Ha or thereby) and has a notional capacity of 70 units. Allocating this site will help address a significant shortfall in effective/deliverable housing land to meet the housing supply target of the Plan. The Plan relies excessively on land which is currently agreed to be constrained. The Plan at Figure 5 page 22 has presented an analysis of targets and supply which is disputed widely by the house building industry through representative body Homes for Scotland and by individual companies. The target is based on a 10% generosity allowance which is not enough for a good market area. 20% generosity would be more appropriate. The Council has unilaterally amended the programming from the 2014 Housing Land Audit and in doing so has inflated the agreed effective housing land supply. It has also made very substantial and uncorroborated assumptions about the potential for constrained sites to come forward to meet the target. It has also conflated the two plan periods 2009 - 2019 and 2019 - 2024 to suggest an overall balance between target and supply, ignoring the clear requirement by the DPEA that the Strategic Development Plan's first two plan periods must be treated as separate periods and the requirements met within those periods. A reassessment of Figure 5 in line with the 2014 Housing Land Audit shows a substantial shortfall of land in both periods, amounting to 3891 in the period 2009 - 2019, and 1852 in the period 2019 - 2024 before any account is taken of constrained land supply. Even accepting the unproven constrained land assumptions i.e. that 4358 constrained sites may come forward across the two periods, does not meet the shortfall against target. However, the constrained land assumptions are disputed as unrealistic. The Plan therefore needs to allocate more effective/deliverable sites. This representation is accompanied by a full planning statement and a transport and access appraisal.

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)	<input type="text"/>	Bathgate Golf Club

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)

Stewart Milne Homes wishes a site to the north and west of the Bathgate Golf Club clubhouse to be allocated for housing. The site is approximately 7 acres in size and could accommodate around 70 houses. The site comprises one hole of the course plus a surplus practice area. The land supply argument for this allocation has been made in another representation and in the supporting documents. The development would comprise enabling development to fund the rebuilding or refurbishment of the clubhouse and to replace one hole of the course which would be lost to development on land to the south. The site is very close to the town centre and local amenities. It is highly-accessible by a variety of means of transport. It has no significant physical, services or infrastructure constraints. It conforms to the policy framework of the Proposed LDP. Stewart Milne Homes is aware of the range of potential developer obligations and can accommodate these. This representation is accompanied by a full planning statement and a transport and access appraisal.

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

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 1 - West Lothian	<input type="text"/>
Proposals Map 2 - Linlithgow & Broxburn Area	<input type="text"/>
Proposals Map 3 - Livingston Area	<input type="text"/>
Proposals Map 4 - Bathgate Area	<input type="text"/>
Proposals Map 5 - Villages	<input type="text"/>

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.

Representation to West Lothian Proposed Local Development Plan

Potential Residential Site - Land at
Bathgate Golf Club

Supporting Planning Statement

November 2015



Turley

Contents

Executive Summary	i
1. Housing Land	1
2. The Site	4
3. The Local Development Plan – Policy Conformity	6
4. Education	8
Appendix 1: Site Design Framework and Design Principles	
Appendix 2: Traffic and Access Appraisal	

Blair Melville



Client

Stewart Milne Homes

Our reference

STEE3001

17 Nov 2015

Executive Summary

1. This Statement is submitted in support of the online representation submitted by Turley/Stewart Milne Homes Central Reference number 71b6908.
2. The Proposed West Lothian Local Development Plan does not demonstrate that it can deliver the housing requirements of the South East Scotland Strategic Development Plan (SESplan) or maintain a minimum 5-year effective housing land supply at all times. The Plan relies heavily on housing land currently agreed with Homes for Scotland as constrained becoming effective within the Plan period, rather than allocating sites which are effective and in the control of house builders. West Lothian Council (WLC) has also amended the agreed 2014 Housing Land Audit programme without consultation. In our submission, the Plan produces housing land shortfalls in both periods 2009 – 2019 and 2019 – 2024. It is recommended that additional housing sites are allocated in the Plan.
3. Stewart Milne Homes (Central) wishes a site at the north end of Bathgate Golf Club to be allocated in the plan for housing. The site measures approximately 7 acres and could accommodate around 70 houses. Stewart Milne Homes has an agreement in principle to purchase the site, the revenue from which will safeguard the future of the Golf Club by allowing it to rebuild or refurbish the clubhouse and replace two holes lost to the development on land to the south of the course.
3. The site can be accessed from a number of points off an existing local distributor road. It is sustainable in terms of its location, accessibility and conformity to Proposed Plan policies. It is free of constraints and can be delivered in the short or medium term to assist with meeting the overall housing land shortfall while maintaining a housing land supply in Bathgate.

1. Housing Land

- 1.1 Stewart Milne Homes is a member of Homes for Scotland and supports the detailed submissions made by Homes for Scotland on the housing land elements of the Proposed LDP.
- 1.2 Figure 5 of the LDP (reproduced below) sets out the SDP housing land requirement and adds 10% to produce a Housing Supply Target. No justification is given for choosing a 10% generosity margin as opposed to 20% which is allowed under SPP. An area of good market demand such as West Lothian would justify a 20% generosity level.

		2009 - 2019	2019 - 20224	2009 - 2024
	Setting the Housing Land Supply Target			
(A)	LDP housing land requirement	11420	6590	18010
(B)	Generosity allowance (+10%)	1142	659	1801
(C)	LDP supply target (A + B)	12562	7249	19811
	Meeting the Supply Target			
(D)	Effective supply	4422	4279	8701
(E)	Constrained sites coming forward	642	3716	4358
(F)	Housing completions 2009 - 2014	2440	0	2440
(G)	Windfall	480	400	880
(H)	Demolitions	568	100	668
(I)	Total supply existing source (D + E +F +G – H)	7433	8295	15738
(J)	Target to be met through new LDP allocations (C – I)	5119	1046	4073
	New LDP allocations			
(K)	Total new LDP allocations	1496	2610	4106
(L)	Shortfall/surplus (J – K)	SHORTFALL 3623	SURPLUS 3656	SURPLUS 33

- 1.3 Figure 5 then shows figures for effective and constrained supplies (Table rows D and E). These are not the same as figures that can be derived from the 2014 HLA. West Lothian Council (WLC) states that it has carried out a review of the 2014 HLA, re-programming sites and making programming assumptions on delivery from constrained land (LDP paragraph 5.48). None of this re-programming was published as background to the LDP, and untested with the housing industry. Likewise, the assumptions on programmed output from new site allocations (row K) are untested. They were only produced recently after requests from Homes for Scotland, but there has been insufficient time to scrutinise them.
- 1.4 The effective supply as shown in the published and agreed 2014 Housing Land Audit is programmed to year 2020/2021. Those sites effective in that period, and which continue beyond 2021, can reasonably be programmed forward also. This gives alternative figures for Figure 5 Row D of 4823 for the period 2009 – 2019 and 2487 for the period 2019 – 2024. Substituting these figures in Figure 5, accepting the new allocations programming in row K but discounting for the moment any constrained supply assumptions, the shortfall can be re-calculated as -3891 for the period 2009 – 2019, and -1852 for the period 2019 – 2024, a total shortfall over the whole Plan period of -5743. The following table sets out the full alternative assessment.

	2009 - 2019	2019 - 2024	2009 - 2024
Housing Supply Target	12562	7249	19811
Completions	2440	0	2440
Effective 2014 Audit	4823	2487	7310
Windfall	480	400	880
Demolitions	-568	-100	-668
SHORTFALL	-5387	-4462	-9849
New Allocations	1496	2610	4106
REMAINING SHORTFALL	-3891	-1852	-5743

- 1.5 On that basis, the assumption that 4358 constrained sites might come forward (row E) still leaves a shortfall. To cover the shortfall from the constrained supply would require 5743 sites from a total constrained supply of 7953 to come forward, or 72% of all the constrained supply. Turley Associates carried out research for the Scottish Executive in 2005 on housing land audits, which included the finding that, on average across Scotland, some 30% of constrained housing land never comes forward for development. In today's funding climate, it is likely that this percentage will be higher.
- 1.6 This analysis also shows shortfalls in both plan periods, as well as a cumulative shortfall over both. It is important to consider the two periods separately. The Reporters who

required SESplan to produce supplementary guidance on strategic housing requirements were clear that the two periods had to be treated separately and on their own merits, and Scottish Ministers confirmed this approach in approving the SG, in spite of objections from SESplan seeking to conflate the two periods.

- 1.7 The extent of reliance by WLC on the constrained land supply, without any evidence of how that land is expected to become effective, is unrealistic and represents a failure to plan positively to meet need and demand by allocating **“a range of sites which are effective or expected to become effective in the plan period”** (Scottish Planning Policy paragraph 119).
- 1.8 The LDP should therefore include additional sites allocated for housing.
- 1.9 Bathgate has a significant number of residential sites allocated in previous Plans. Page 81 of the Plan lists all existing and proposed sites in Bathgate, including some mixed-use sites with residential capacity. The large majority of these sites are carried forward from previous plans. Most of the new allocations are smaller sites, mostly owned by WLC and assumed to be intended for Council/RSL housing. The 2014 Housing Land Audit shows that there is a good demand for market housing in Bathgate, but that most of the Bathgate sites will be complete by 2019. There will be a limited supply of housing land for the period 2019 – 2024, especially for market housing. There remain doubts over progress on some of the allocated sites, notably H-BA 16 and 17, where there is no known developer interest.
- 1.10 In that context, it would be reasonable to allocate further effective, deliverable sites to sustain a housing land supply in Bathgate.

2. The Site

- 2.1 The site is a semi-circular area which comprises approximately 7 acres or thereby at the north end of Bathgate Golf Club, covering one hole and a practice area to the north and west of the clubhouse. The practice area is surplus to the Club's requirements. The Golf Club wishes to sell the land to raise finance to rebuild or refurbish the clubhouse and pay for the replacement of the hole on land to the south of the course. Bathgate Golf Club recently undertook (12 months ago) an independent dilapidation survey report on the condition of the clubhouse. The buildings are in poor state of repair with works required in excess of £500,000. The report recommended that the clubhouse be rebuilt as a better method of protecting and safeguarding this local amenity. The Club can make available a copy of the report if required.
- 2.2 Bathgate Golf Club has a distinguished place in the history of Scottish golf, having produced 2 Ryder Cup captains and three Ryder Cup players. However, membership has fallen by c. 10% in recent years, and this enabling development will help improve the Club's amenities and secure its long-term future.
- 2.3 Stewart Milne Homes has an exclusivity agreement with the Club to purchase the land subject to planning.
- 2.4 The site boundary and locational context is shown on plans in the Appendices. It lies to the north and west of the clubhouse, and is bounded by the local distributor road which serves Morrisons supermarket, a future retail site, the Golf Club and Network Rail's Bathgate depot. There are two allocated housing sites, H –BA16 and 17, to the west of the site. The site is reasonably flat, and offers no restrictions on building. It has a sparse tree and shrub edge to the distributor road, with a mix of coniferous and deciduous semi-mature trees. These are mostly one tree deep and are not a continuous line. The eastern edge of the site is screened from the main rail line by a close-boarded wooden fence.
- 2.5 The site is well-located for access to the town centre and a range of local facilities. An accompanying Transport and Access Appraisal by Modus Transport Solutions Ltd (Appendix 2) demonstrates the accessibility and sustainability of the site in transport terms. Access via Linkston Way is good and there are options for forming an access into the residential site. A range of public transport services, footways and safe routes to school are available as well as vehicle access via lightly-trafficked roads.
- 2.6 The design framework and principles in Appendix 1 show one option for site access and layout, with capacity for around 70 houses. The site would allow for an attractive setting related to the edge of the golf course, while also allowing an enhanced landscape framework between the housing, the golf clubhouse, and the adjacent commercial uses. Any trees on the northern edge of the site lost in creating an access and visibility splays can be replaced and augmented in a new landscape framework.
- 2.7 Stewart Milne Homes has investigated site servicing, and there are no insurmountable issues in respect of foul drainage, water supply, gas, electricity and telecoms.

2.8 If the site were allocated in the LDP then Stewart Milne could achieve first house completions as early as 2017, thus contributing to meeting the shortfall in the first plan period.

3. The Local Development Plan – Policy Conformity

- 3.1 The Vision Statement on page 8 seeks a greater choice of housing options, supported by the full range of education and community facilities. It also requires that development will take place in a way that is sustainable. The site provides a further housing option in Bathgate, which would contribute to addressing the significant shortfall. Stewart Milne Homes is fully aware of the requirements for affordable housing contributions and for contributing to education capacity. The site is highly-sustainable.
- 3.2 The Aims on page 9 include Sustainable Housing Locations – there should be a generous supply of land and an effective five-year housing land supply at all times. Part 1 of this submission makes a clear case on land supply grounds for the allocation of this site. Sites are to be supported by proportional developer contributions and Stewart Milne Homes is aware of this requirement.
- 3.3 Paragraph 5.2 sets out the sustainability factors which have influenced the Plan. The site clearly meets the first three criteria in terms of location, accessibility and transportation. It also helps conserve and enhance environmental resources by securing the future of Bathgate GC, thereby retaining recreation and green space.
- 3.4 Paragraph 5.5 notes that new housing outwith CDAs meets the wider SDP Policy 7 objective of maintaining a five year effective housing land supply.
- 3.5 Paragraph 5.6 requires that development should seek to improve the quality of life. This proposal meets that aim by supporting the long-term future of Bathgate Golf Club.
- 3.6 Policy DES1 page 11 sets out design principles. Appendix 1 includes a sketch site design framework and a summary of how the site can meet the design principles of the Plan.
- 3.7 On page 19 Community Regeneration Bathgate is identified for a 15% affordable housing contribution. Stewart Milne Homes can meet this obligation.
- 3.8 Paragraph 5.37 page 20 sets out key objectives to guide new housing land allocations. The Bathgate site can deliver all of these.
- 3.9 Page 24 Policy HOU3 Infill/Windfall housing sets a series of criteria for sites such as Bathgate GC.
- **Criterion a** : the site is close to the town centre and will provide a mix of housing well-located for services and amenities
 - **Criterion b** : the site is shown as open space but there are sound sustainable grounds for allocating as housing
 - **Criterion c** : the proposal accords with both ENV21 and ENV 22 by safeguarding the future of the Golf Club, thereby protecting and enhancing formal leisure space

and greenspace/landscape. Stewart Milne also notes the possible requirement to contribute to the enhancement of local park facilities

- **Criterion d** : the site is adjacent to sites H –BA 16 and 17 both allocated in the previous Local Plan for housing
- **Criterion e** : the accompanying Traffic and Access Appraisal demonstrates fully the site’s excellent accessibility and transport characteristics
- **Criterion f** : Stewart Milne Homes is unaware of any servicing and infrastructure constraints. Education is considered separately
- **Criterion g** : Stewart Milne accepts the need to provide necessary infrastructure in line with the terms of Circular 3/2012
- **Criterion h** : there is no known flood risk
- **Criterion i** : compliance is demonstrated through this Statement

- 3.10 Page 33 discusses sports facilities, and the plan supports existing/new facilities and increased physical activity. Securing the future of Bathgate GC meets these plan outcomes.
- 3.11 Pages 34 – 38 cover transport and travel issues. The accompanying Traffic and Access Appraisal addresses these matters and shows how the site meets a range of criteria and requirements.
- 3.12 Policy ENV10 page 47 covers Protection of Urban Woodland. The site has a single discontinuous line of semi-mature trees around parts of the northern and western boundary. Any loss of trees can be compensated for by new planting and an enhanced landscape framework for the whole site, including creation of a buffer zone between the housing and the golf club.
- 3.13 Paragraphs 5.215 – 5.221 discuss low carbon and renewable energy. Stewart Milne Homes is a market leader in sustainable design/construction, incorporating many new innovations in design, materials, construction and micro-renewables into its mainstream housing products.

4. Education

- 4.1 Stewart Milne Homes and Turley understand from discussions with WLC Education Service that the site falls into the catchment of Bathgate High School and its Primary School cluster, notably Simpsons Primary School. Both schools have been expanded to accommodate a period of significant housing development. Some capacity does exist in Boghall PS and in the denominational St Cuthberts PS.
- 4.2 The adjacent housing sites H –BA 16 and 17, however, fall into the catchment of Windyknowes PS and Armadale HS. A number of improvements and extensions to schools in this catchment have been carried out, primarily to deal with the impact of Armadale CDA, but some capacity could exist, and it is understood that Armadale HS does have space to expand.
- 4.3 An option may be to adjust the catchment to include the Bathgate site in the Armadale HS catchment. No existing households would be affected by such a change to catchment areas, and it seems sensible that a site to the south of the main railway line should lie in that catchment.
- 4.4 It is also noted that some allocated housing sites, particularly H-BA 16 and 17, show no signs of coming forward and Stewart Milne Homes is aware of no developer interest in these sites. The planning conditions relating to their consents may lapse in due course and any notional education capacity becomes available for other developers.
- 4.5 More generally, Stewart Milne Homes questions whether it is competent for the Council to seek to reserve education capacity for specific sites, since it is impossible to predict which of a range of sites without planning consent is likely to come forward first and at what build rate.

Appendix 1: Site Design Framework and Design Principles

1. This submission is accompanied by a location context diagram, which shows the accessibility of the site to the centre of Bathgate and its amenities. It is also accompanied by a sketch design framework, which shows one option for accessing and layout. It demonstrates that the site can meet Stewart Milne's aspiration to accommodate c. 70 houses on the site, thereby generating the receipt for the Golf Club to carry out its improvement works.
2. The Turley outline Development Framework plan has been developed to illustrate the potential of the site adjacent to the Bathgate Golf Club, for deliverable residential development.
3. The plan as illustrated complies fully with provisions of the LDP Policy, **DES1 – Design Principles**. In line with the Policy DES1, the outline framework plan has therefore adopted the following design principles:
 - Accessibility – the development would be built on relatively flat land so accessibility for all is assured (DDA and cycling provision in particular); it is also envisaged that new pathway connection will be made linking to the new road ways under the rail line north to the B70002 and onto the town centre; similarly links to the east via the existing golf club access (under rail lines) will also be developed.
 - Integrated – the plan seeks to achieve a balanced mix of tree lined roads, open space spine and edges along with home zone 'street' access ways where feasible.
 - Permeable – the layout intended will offer flexible solutions for residential development and a permeable network of roads and streets
 - Defensible boundaries – the development framework sits within well-defined and defensible boundaries – enhancing the existing tree'd edge to the north, east and west and working with the golf club to create an integrated buffer edge to the south.
 - Good neighbour to the existing uses of golf course (sharing a common open space facility) and to the new Morrisons store and other land uses envisaged to the south west of the site.
 - Accentuates the positive landscape features around the site and integrates with the proposed landscape treatment
 - Appropriate density applied to the development parcels can produce a vibrant and attractive small community delivering a particular sense of place with mixed scale and typologies. Including provision for and location of affordable housing in a specifically designed cluster.

Appendix 2: Traffic and Access Appraisal

1. This submission is accompanied by a Traffic and Access Appraisal by Modus Transport Solutions Limited.

Turley Office





Copyright of Turley

This drawing is for illustrative purposes only and should not be used for any construction or estimation purposes. To be scaled for planning application purposes only.

No liability or responsibility is accepted arising from reliance upon the information contained within this drawing.



Site boundary

Client:
Stewart Milne Homes (Central)

Project:
Bathgate Golfclub

Drawing:
site location plan

Project Number:
STEE3001

Drawing Number:
10_

Revision:
00 Status:
Illustrative

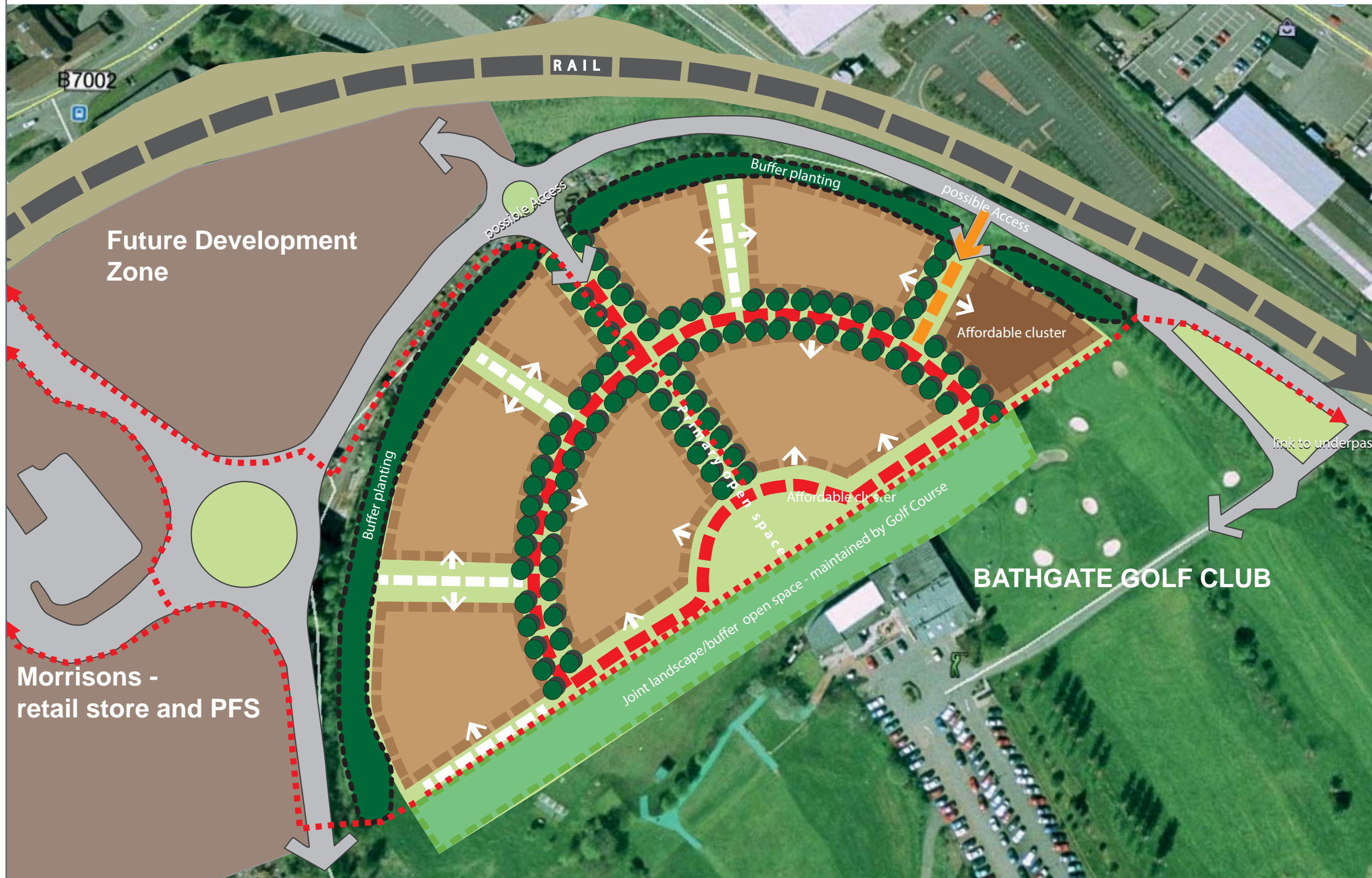
Date:
Nov 2015 Scale:
NTS



Copyright of Turley

This drawing is for illustrative purposes only and should not be used for any construction or estimation purposes. To be scaled for planning application purposes only.

No liability or responsibility is accepted arising from reliance upon the information contained within this drawing.



- External Roads
- Local access circulation - secondary access in orange
- Development Parcels - with shared access streets (white dashed lines) and white arrows illustrating general access orientation
- Affordable housing cluster (15%)
- Public Open Space
- Shared open space
- Buffer planting - existing trees reinforced with new planting
- Avenue/street Trees

Client:
Stewart Milne Homes (Central)

Project:
Bayhgate Golfclub

Drawing:
Outline Development Framework

Project Number:
STEE3001

Drawing Number:
10_

Revision: **00** Status: **Illustrative**

Date: **Nov 2015** Scale: **NTS**

STEWART

Milne

HOMES



West Lothian Council
Local Development Plan
Bathgate Golf Club

Transport and Access Appraisal
November 2015



Modus

 Transport Solutions Ltd

Table of Contents

1.	Introduction	1
1.1	Background.....	1
1.2	Report Structure.....	1
2.	Existing Transport Network	3
2.1	Introduction	3
2.2	Pedestrian and Cyclists.....	3
2.3	Public Transport	5
2.4	Existing Road Network	6
2.5	Summary of Existing Transport Network.....	7
3.	Potential for Development on Site	8
3.1	Introduction	8
3.2	Pedestrians	8
3.3	Cyclists.....	8
3.4	Public Transport	8
3.5	Road Access	8
4.	Overall Summary and Conclusions	9

1. Introduction

1.1 Background

Modus Transport Solutions Ltd was commissioned by Stewart Milne Group to provide transport and access advice in respect of the site at Bathgate Golf Club and the potential for the site to be allocated within the West Lothian Council Local Development Plan.

The site lies at the northern most end of Bathgate Golf Club, adjacent to the access road leading to the Network Rail Depot and the undeveloped retail site to the west of Linkston Way. The site is currently used as a practice area for the Golf Club and contains one hole which forms part of the existing golf course. The practice area and hole which form part of the site can be provided elsewhere on the course without impacting upon the overall course setting.

The location of the potential site in relation to the surrounding area is shown in Figure 1.0.

1.2 Report Structure

This report considers the potential allocation of the development site within the Local Development Plan on the basis of its accessible location and ability to meet with both local and national transport planning policy for new developments. This report considers the accessibility of the potential site in terms of the existing accessibility by all modes of transport. Specifically this report considers the existing transport network in and around the potential site and considers potential links to sustainable transport infrastructure and how residents of the potential site would move in and around Bathgate and the wider area using sustainable transport modes.

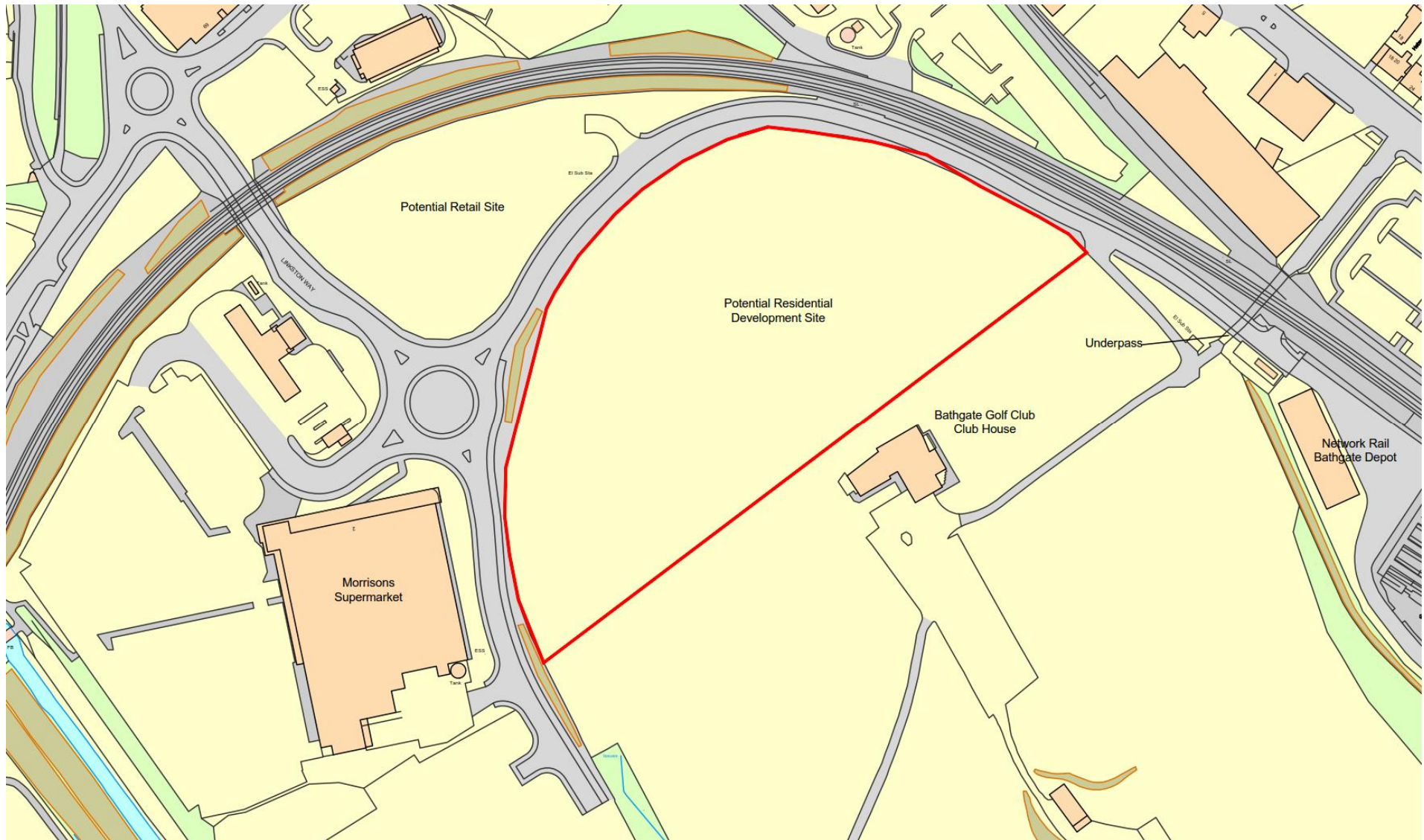


Figure 1.0: Potential Site Location

2. Existing Transport Network

2.1 Introduction

The following section sets out the existing transport infrastructure in the local area surrounding the potential development site. In accordance with Scottish Planning Policy and transport planning best practice the accessibility of the site has been assessed on the basis of the hierarchy of pedestrian, cyclists, public transport and the private car.

2.2 Pedestrian and Cyclists

The site is extremely well placed to benefit from the extensive network of pedestrian and cycle routes surrounding the site. A good quality pedestrian / cycleway is currently provided from Linkston Way past the site on the northern side of the access road. This route in turn links into the access route to Bathgate Golf Club which then provides an access under the railway line, via an underpass, and then to Edinburgh Road and Bathgate Railway Station.

Figure 2.1 shows the existing pedestrian / cycle link past the site with Figure 2.2 showing the existing underpass.



Figure 2.1: Existing pedestrian / cycle link past potential site.



Figure 2.2: Existing underpass.

High quality pedestrian facilities are also provided to the Morrisons supermarket to the west of the development site, with dropped kerb crossing points on two arms of the roundabout and the potential to provide dropped kerbs on the remaining two. These existing pedestrian links provide direct access to the bus stop and shelter on Linkston Way as well as access to Whiteburn road and a direct pedestrian route into Bathgate Town centre.

St Mary's RC Primary School is located approximately 650m from the potential site and is accessed by a series of good quality pedestrian footways with appropriate pedestrian crossing facilities and school crossing patrols.

Balbardie Primary School is located approximately 1250m to the north east of the site and is accessed through the town centre via a series of good quality pedestrian footways. Again, there are appropriate pedestrian crossing facilities, some signalised, and school crossing patrols therefore ensuring that the route to school is safe and convenient.

Bathgate Academy, the main high school for Bathgate, is located approximately 2,200m from the prudential development site. Using the underpass to the east of the site, pedestrian are provided with good quality footways and crossing facilities on route to the school providing a safe and easily walkable safe route to school.

National Cycle Route 75 (NCR 75) also passes to the west of the site and can be access from Whitburn Road, a short distance from the site. NCR 75 provides cyclists with access to Livingston via a mixture of off-road and on-street cycle links.

2.3 Public Transport

Bus Services

The closest bus stop to the potential site is located on Linkston Way approximately 250m from the site. The bus stop and shelter are provided on the western side of Linkston Way with bus services using the roundabout adjacent to the site to turn and access the bus stop.



Figure 2.3: Existing bus facilities on Linkston Way.

At the time of preparing this report the bus stop on Linkston Way is served by services operated by E & M Horsburgh Ltd, Blue Bus Ltd, S.D Travel and First Group. There are a total of 8 services operating from this bus stop providing routes to destinations Bathgate Town Centre, Bathgate Train Station, Wester Inch, Boghall, Edinburgh, Livingston, West Calder and a number of intervening villages.

Table 2.1 provides a summary of the local bus routes and frequencies provided from the Linkston Way bus stop.

Route No.	Operator	Route	Frequency
4	E&M Horsburgh Ltd	Bathgate Town Centre	30 mins Mon – Sat
5	Blue Bus Ltd	Wester Inch Tesco, Station, Morrisons (Loop)	30 mins Mon – Sat
8	E & M Horsburgh Ltd	Morrisons, Belvedere, Station, Tesco, Starlaw, Boghall	60 mins Sun Only
21	S.D Travel	Falside Bathgate Kaim Park Boghall	60 mins Mon - Sat
27	First	Edinburgh (Regent Road) - Bathgate (Morrisons) Via Sighthill - Wilkieson - Mid Calder - Livingston - Craigshill - Deans	60 mins Mon – Fri 60 mins Sun
28	First	Edinburgh (Regent Road) - Bathgate (Morrisons) Via Sighthill - Kirknewton - Mid Calder - Livingston - Howden - Deans	30 mins Mon – Sat 60 mins Sun
36	E & M Horsburgh Ltd	Livingston Polbeth West Calder Loganlea Bents Blackburn Bathgate	60 mins Mon - Sat
36	First	Bathgate Loganlea	60 mins Mon - Fri

Table 2.1 Existing bus services

Table 2.1 demonstrates that the bus services available on Linkston Road, within an easy 250m walking distance of the potential site, provide excellent local and longer distance services to local amenities, school, the train station as well as centres of employment in Livingston and Edinburgh.

Rail Services

The existing network of pedestrian footways in the local area provide excellent linkages to Bathgate station, either using the existing underpass adjacent to the golf course or the network of footways from Linkston Way, Whitburn Road and the A89. The station lies within a short ten minute walk (650m) of the potential site.

Bathgate Station forms part of the Airdrie Bathgate line which was opened in October 2010 and provides services from Edinburgh Waverley to Helensburgh in the west of Scotland and all intervening stations. Twelve services are provided from Bathgate to Edinburgh in the morning peak which would enable a commuter from Bathgate to arrive in the centre of Edinburgh before 9am. Similarly, there are ten services from Bathgate in the morning peak which would enable a commuter from Bathgate to arrive in Glasgow Queen Street station before 9am.

A similar level of services is provided from Edinburgh and Glasgow to Bathgate in the evening peak period.

2.4 Existing Road Network

The potential site is very well connected to the existing road network with a direct link onto Linkston Way, via the roundabout at Morrisons, and then Whitburn Road and the A89. From the A89 it is possible to gain easy direct access to the M8 motorway and in turn travel west to Glasgow or east towards Edinburgh, Stirling and Fife.

2.5 Summary of Existing Transport Network

The potential site is well situated in respect of existing walking, cycling and public transport infrastructure. High quality footways and cycle links provide safe and direct access to local amenities, including shop, schools, the train station and the two centre.

The potential site is very well served by public transport facilities with both bus and train services within a very short walk from the site. The bus and train services offer frequent services to key destinations including Edinburgh and Glasgow as well as many of the surrounding local villages and towns.

Finally, the potential site has direct and easy access to the local road network in Bathgate as well as direct access to the M8 motorway network and the wider network towards Glasgow in the west and Edinburgh and the central belt in the east.

3. Potential for Development on Site

3.1 Introduction

This section of the report provides initial comments on the potential access to the development site for walking, cycling and the private car and sets out the potential improvements which will enhance the connectivity of the development.

3.2 Pedestrians

Pedestrians will access and egress the development site by making use of the existing extensive network of footways which surround the site. These footways connect with existing amenity in the area including the Morrisons supermarket, the Bathgate Retail Park, the town centre, local schools and Bathgate Station. The potential development site is therefore ideally placed to offer its residents easy and safe walking opportunities and therefore help develop a sustainable development.

3.3 Cyclists

Once again cyclists are provided with the opportunity to use both local and longer distance cycle facilities with direct links to National Cycle Route 75. The potential therefore exists for residents from the potential development site to access local amenities, and longer distance employment opportunities, by bicycle.

3.4 Public Transport

The potential site lies adjacent to both frequent local and long distance bus services as well as a main train station offering frequent train services to Edinburgh and Glasgow and all intervening stations. The potential site is therefore ideally placed to offer residents of the development the choice to use sustainable transport modes instead of the private car.

3.5 Road Access

Access to the potential site can be achieved at a number of locations along the existing access road. Depending upon how West Lothian Council view the access road there are a variety of access points which would be provided. Ideally, the road should be considered as a residential street and therefore the access options should consider the good practice guidelines as set out in Designing Streets and the SCOTS National Roads Development Guide (SCOTS – Society for Chief Officers of Transport in Scotland).

Access could potentially be provided by simple priority junctions or through alterations to the existing retail access and the formation of a small four arm roundabout.

4. Overall Summary and Conclusions

The potential development site is ideally placed to meet with both local and national transport policy in respect of access to sustainable transport infrastructure and therefore the ability to provide residents of the potential development the ability and choice to use sustainable transport modes.

Local amenities such as the shops, school and the train station are all located within easy walking distance of the development site and these are accessed by a series of high quality and well-lit pedestrian footways with appropriate crossing facilities.

Access to public transport from the potential site is very good, with local bus stops less than a 250m short walk from the site and frequent services provided to both local and longer distance destinations. The site also benefits from its close proximity to Bathgate station which is a short ten minute walk from the site. Bathgate station provides frequency services to both Edinburgh and Glasgow, and all intervening stations, and therefore provides a real alternative for commuters from the potential site to travel to larger centres of employment.

Access to the local road network from the development site can be provided from a number of possible locations and these access points can be provided in accordance with West Lothian Councils guidelines as well as Designing Streets and the SCOTS National Guidelines. Appropriate junction form with sight lines and pedestrian facilities can be provided from the existing access road which will meet and serve the need of the potential site.

Online Representation 71b6908 – Copy of Text of Representations

Stewart Milne Homes Central *per* Turley

1. Housing Land Requirements for the LDP Page 20 Paragraphs 5.36-5.49

This representation seeks the allocation of site for housing to the north of Bathgate Golf Club. The site is approximately 7 acres in area (2.53 Ha or thereby) and has a notional capacity of 70 units. Allocating this site will help address a significant shortfall in effective/deliverable housing land to meet the housing supply target of the Plan. The Plan relies excessively on land which is currently agreed to be constrained. The Plan at Figure 5 page 22 has presented an analysis of targets and supply which is disputed widely by the house building industry through representative body Homes for Scotland and by individual companies. The target is based on a 10% generosity allowance which is not enough for a good market area. 20% generosity would be more appropriate. The Council has unilaterally amended the programming from the 2014 Housing Land Audit and in doing so has inflated the agreed effective housing land supply. It has also made very substantial and uncorroborated assumptions about the potential for constrained sites to come forward to meet the target. It has also conflated the two plan periods 2009 - 2019 and 2019 - 2024 to suggest an overall balance between target and supply, ignoring the clear requirement by the DPEA that the Strategic Development Plan's first two plan periods must be treated as separate periods and the requirements met within those periods. A reassessment of Figure 5 in line with the 2014 Housing Land Audit shows a substantial shortfall of land in both periods, amounting to 3891 in the period 2009 – 2019, and 1852 in the period 2019 – 2024 before any account is taken of constrained land supply. Even accepting the unproven constrained land assumptions i.e. that 4358 constrained sites may come forward across the two periods, does not meet the shortfall against target. However, the constrained land assumptions are disputed as unrealistic. The Plan therefore needs to allocate more effective/deliverable sites. This representation is accompanied by a full planning statement and a transport and access appraisal.

2. Bathgate Page 81

Stewart Milne Homes wishes a site to the north and west of the Bathgate Golf Club clubhouse to be allocated for housing. The site is approximately 7 acres in size and could accommodate around 70 houses. The site comprises one hole of the course plus a surplus practice area. The land supply argument for this allocation has been made in another representation and in the supporting documents. The development would comprise enabling development to fund the rebuilding or refurbishment of the clubhouse and to replace one hole of the course which would be lost to development on land to the south. The site is very close to the town centre and local amenities. It is highly-accessible by a variety of means of transport. It has no significant physical, services or infrastructure constraints. It conforms to the policy framework of the Proposed LDP. Stewart Milne Homes is aware of the range of potential developer obligations and can accommodate these. This representation is accompanied by a full planning statement and a transport and access appraisal.