

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 <u>wlldp@westlothian.gov.uk</u> 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

- \checkmark as an individual (and representing your own views)
- \Box 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 comp ete the following contact information: *

Please note that this is a mandatory field

Title	Mr
First Name	John
Surname	Orr
Email Address	
Telephone	
Postal Addesss	
Organization Name	not applicable
Client's Name	not applicable

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

Please note that this is a mandatory field

- yes
- C 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 P an 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

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2. FOREWORD (page 4)

This introduction by the Leader of the Council establishes the ro e of the LDP and how it will he p deliver the council's core objectives.

Do you wish to make a comment?

- C 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?

- O yes
- no

Please use the text box below for comments.

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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?

O yes

no

Please use the text box below for comments.

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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 P anning etc (Scotland) Act 2006 and what documents will accompany the p an i.e. the Action Programme etc.

Do you wish to make a comment?

- C yes
- no

Please use the text box below for comments.

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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
- C no

If you wish to make comments p ease 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 My representation is an objection to the contents of the current draft plan in relation to sustainable housing locations. My concerns are twofold: 1. The vision to Provide a generous supply of housing land and an effective five year housing land supply at all times. It is clear to me from the list of housing sites proposed in the plan includes a large number which are not effective, because the have significant infrastructure issues which make them both impractical and uneconomic to develop. Furthermore, many of the sites chosen are in areas which are particularly badly affected by former coal mining activity thus again directly affecting their economic viability. In order to address these issues, alternative sites need to chosen which are, are dar as possible free from these constraints, or at least minimise them. 2. Continue to support the priciple of further housing development in existing CDAs. This element of the current proposals is both misguided and pointless. The current list of CDAs was effectively established in the run up to the xurrent WLLP which was formally adopted in 2009. Since then, only some of the CDAs have seen development activity - most notably Armadale, East Calder, Whitburn and Winchburgh. Even within these areas there are continuing issues. e.g. South Armadale is unlikley to ever happen due to a combination of ground conditions and fragmented landownership. More importantly however is the complete lack of any progress in CDAs at West Livingston and West Broxburn. After nearly 7 years, to continue to promote these for mixed use development is a huge mistake, as they are never likley to happen, other than a possible small area of development around the edges. The former is not economically viable and suffers from some of the worst ground conditions in the area. The roads and transport links are woeful, and the provision of new roads and bridges uneconomic.In addition, it has the continuing problem of a battery chicken farm on its doorstep-so major environmental issues. With regard to Wes

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

Sustainable Housing

Locations (page 9)

C no

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

- \square 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)
- $\hfill\square$ 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)	see previous comments under sustainable housing locations	
Effective Housing Land and Generous Supply (page 23, paragraphs 5.50- 5.53)	see previous comments under sustainable housing locations. For the reasons already given, it is clear to me that many of the sites listed are not part of an effcetive land supply. However, in particular, the allocations at Colinshiel A and B; H-BU-8, 9 and 10 and H- LV-13 are not effective. These cover a total in allocations of 3720 units. These should be abandoned, and a range of other smaller more easily developed sites throughout West Lothian chosen instead.	
Strategic Allocations (including previously identified Core Development Area Allocations) (page 25, paragraphs 5.57- 5.61)	see previous comments under sustainable housing locations and effcetive housing land supply	
Countryside Belts (page 42, paragraph 5.144)	The proposal to effectively create a new green belt around the whole of Bathgate is counter intuitive. Bathgate is the second largest settlement in West Lothian and given the SESPlan designation for West Lothian should be capable of further development. The current proposal, if approved, will effectively put a stranglehold on Bathgate meaning that it cannot be developed any further. This proposal should be reversed, and the existing policies in the WLLP retained to protect those areas of particular landscape value around Bathgate. The area to the north of Bathgate should HOT be allocated for any form of landscape protection for the reason just outlined, but also because it is not of any particular beauty or character other than as a typical rural area on the edge of any small town.	

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 p ease begin by selecting the relevant Sett ement(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)
- Newton 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)	H-BA-1 and 6	Balmuir Road and Easton Road
Broxburn (page 84)	H-BU8,9,10and 13	Greendykes Road West and East, West Wood and Kirkhill North
Livingston (page 90)	???	
Torphichen (page 94)	???	

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Comment

Bathgate (page 81)	Balmuir Road - small site low lying - bounded by Bathgate Water - almost certainly undeveopable due to flood risk; Easton Road(Sibcas) probably undevelopable due to contamination and adverse ground conditions. Was included in the WLLP and nothing has happened since.
Broxburn (page 84)	see previous comments regarding these sites in the Broxburn CDA. With regard to Kirkhill North, it is interesting that having never featured in the adopted WLLP or in the call for sites or the Major Issues Report a greenfield site on the edge of an existing settlement has been chosen for the development of 230 houses. Why should this situation not be allowed in respect of other towns in West Lothian. In particular, in north Bathgate.
Livingston (page 90)	see previous comments regarding the West Livingston CDA and Gavieside Farm.
Torphichen (page 94)	The actchment area for Torphichen could be extended further south to the edge of Bathgate to allow expansion on the north side of Bathgate. A new primary school would be required, and this would ease the pressure on the current Torphichen PS.

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?

- O yes
- no

If you wish to make comments p ease 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.

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

Appendix 6 - List of Proposals (page 275)

10. GLOSSARY (page 280)

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

Do you wish to make a comment?

C yes

no

Please use the text box below for comments.

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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?

- C yes
- no

If you wish to make comments p ease 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.

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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	

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?

- C yes
- no

If you wish to make comments p ease 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.	
Equalities & Human Rights Impact Assessment (EQHRIA).	
Strategic Flood Risk Assessment (SFRA).	
Habitats Regulations Appraisal.	
Transport Appraisal (TA).	
Action Programme.	

13. ADDITIONAL COMMENTS

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

- yes
- C 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

The importance of the emerging LDP is of critical importance to the future development of the whole of West Lathian. As part of this process, a revised and more realistic approach should be taken to in particular the supply of land for residential development to ensure a range of new homes for both private and affordable housing, by bringing forward a wider range of sites which the market will respond positively to. This rather than remaining "wedded" to certain sites which have been included in previous plans, have not been brought forward for development in at least 7 years and show no signs of being capable of development within the new Local Development Plan period, even at a time when house prices, and land prices have largely recovered to pre financial crash levels. Unless these issue sare resolved, developers will not be building in West Lothian, but will have to take their investment to other areas where the supply of effective land for development is more plentiful. This will in turn mean fewer affordable houses being developed in West Lothian, fewer private houses for sale, and the inevitability of hopuse price inflation in the area which in turn will push prospective residents into other areas where supply and affordability are both more realistic.

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.