Proceed later? Keep this code: 957c30a



## 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: \*

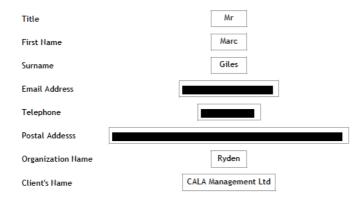
Please note that this is a mandatory field

- 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)
- $\Box$  as a representative of a public organisation (and representing the views of that organisation)
- s 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



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

Please note that this is a mandatory field

- C 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 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	EOI-0015	
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?

- yes
- C 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

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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.

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 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?

- C yes
- 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

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)	

# 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?

- C yes
- 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)
- $\square$  Housing land requirements for the LDP (page 20, paragraphs 5.36-5.49)
- $\hfill\square$  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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Unconventional Gas Extraction including Hydraulic Fracking (page 75, paragraph 5.259)	
Waste (page 76, paragraph 5.260)	

# 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?

- C 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
Linlithgow & Linlithgow Bridge (page 89)	H-LL3	Boghall East

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

Linlithgow & Linlithgow Bridge (page 89)

West Lothian Council Local Development Plan - Proposed Plan Representation on behalf of CALA Management Ltd H-LL3 Land at Boghall East, Linlithgow 1. The Site 1.1 The 3.3 ha site at Boghall East, Linlithgow is located south of the A803 (Blackness Road), within a wider residential area east of the town's core. The site is open and flat with a single mature tree near its northern boundary. It is bounded on three sides by residential properties and a private road access is located on the western boundary servicing residential properties. 2. Background 2.1 CALA submitted a detailed planning application (Ref: 14/0302/FUL) in April 2014. This application was not determined and is currently the subject of an appeal to the DPEA (ref: PPA-400-2058). It proposes the erection of 49 units, incorporating 4 and 5 bedroom family houses and affordable housing. 2.2 West Lothian Council's (WLC) Main Issues Report (M R) for the emerging Local Development Plan (LDP) was the subject of a consultation process from 25 August 2014 to 17 October 2014. The site at Boghall East (reference E01-0015) was supported as a preferred new housing site with capacity to support 50 houses. The MIR also advised that the Council no longer supported Class 4 development on the site as set out in the adopted West Lothian Local Plan (WLLP). 2.3 The LPD has now progressed to the Proposed Plan stage. The site is identified as a housing allocation with a development capacity of 50 units (Ref:H-LL3). The Council continues to support the change of use of this site from employment to residential use. 3. CALA Representation 3.1 CALA is supportive of the proposed LDP allocation for residential development at Boghall East (HLL3) in principle. 3.2 WLC has recognised that this site is no longer appropriately allocated for employment purposes. The emerging LDP comes forward against the background of a revised strategic planning framework which identifies a large housing land requirement, particularly in the period up to 2019. The 'area of restraint' policy which has restricted the growth of Linlithgow is removed and Linlithgow is now allocated within a Strategic Development Area (SDA) where smaller scale sites, satisfying a local need and facilitated by local infrastructure are supported. 3.3 The Proposed Plan follows the SESplan position and confirms that Linlithgow is no longer an area of restraint and allocates the Boghall East site for residential use. 3.4 However, CALA does object to the Proposed Plan under the following terms; • The proposed re-allocation of Boghall East from the catchment area of Linlithgow Primary to Low Port Primary school. • Other potential constraints attributed to this site within the Schedule of Housing Sites have been resolved through negotiations associated with CALA's previous planning application (LPA Ref: 14/0302/FUL) and the Proposed Plan should be amended to reflect that position. • The application of a sequential approach to the selection of housing sites does not prioritise the most effective allocations and delivery of the housing land requirement. 3.5 Delivering the housing land requirement as laid out in SESplan and the Housing Land SPG must be the key priority for this Plan. It should bring forward effective sites and not simply apply a hierarchical approach to the allocation of housing land. Moreover, the current LDP Review represents an opportunity to address the issues highlighted through the recent Ministerial appeal decisions in Linlithgow, at Burghmuir and Clarendon. Against this background, the plan must also address the significant housing land shortfall and particularly, the ever increasing pressure on housing delivery pre-2019. 3.6 The sequential approach adopted by WLC to new development in Linlithgow fails to address these priorities. It will not deliver the housing land requirement, nor will it address the significant housing land shortfall pre-2019. In its current format, the Plan prioritises brownfield allocations which are constrained and/or will not make a significant contribution pre 2019. The priority must be delivery of effective sites, which can help to meet the housing land shortfall pre-2019 and in doing so, provide contributions towards the delivery of the Winchburgh schools programme. Schedule of Housing Sites/Site Delivery Requirements 3.7 Housing sites allocated within the LDP are identified within this schedule which also sets out the requirements associated with the delivery of those sites. 3.8 The site at Boghall East is listed under this schedule at page 193 of the Proposed Plan which confirms its allocation as a housing site with a capacity for 50 units. However, there are a number of constraints/issues associated with this allocation which CALA has resolved through negotiations during the determination of their detailed planning application (Ref: 14/0302/FUL). Access: CALA's detailed planning application proposes a priority junction access onto Blackness Road. The private access to the west of the site is retained and a new pedestrian link would be created into Grange Knowe. Archaeological potential: West of Scotland Archaeological Society confirmed through their consultation response that a field evaluation would be required prior to development of this site. Noise: WLC did not request a noise assessment to support CALA's planning application and this issue was not raised during the consultation process. Therefore, there is no potential for noise related impact resulting from the proposed residential development. Contaminated land: The Council's Contaminated Land Officer raised no objection to the planning application and was ultimately satisfied that the soils within the site posed a low risk of contamination. Flooding & drainage: Through the process of determining the planning application negotiation took place between CALA, WLC and Scottish Water (SW). The conclusions from those negotiations is summarised as follows; • The key statutory consultees SW and SEPA did not object to this application subject to appropriate, standard conditions. • The Drainage Impact Assessment (DIA) prepared by SW confirms that foul discharge from the proposal can be mitigated to achieve 'zero impact' as required by them. • Storm run-off rates have been calculated and a system proposed to attenuate those predicted flows by way of SUDS treatment, in compliance with SW guidelines and approved by them. • The level of proposed treatment for run off is appropriate and proposes two levels of treatment for roads run-off. • SW confirms that run off water quality will be of a higher standard than is required by them. SEPA has not objected to the proposed drainage solution thereby acknowledging its acceptability. Education 3.9 CALA objects to Boghall East's inclusion in the school catchment area for Low Port Primary school. 3.10 The site is located within the Springfield estate and CALA's proposals (now at appeal) are promoted on the basis that the pupils of primary school age would attend Springfield Primary. This is the closest primary school to the site and consultation responses from WLC's Education Department in response to CALA's planning application confirm the site's relationship with Springfield Primary. Indeed, the subsequent appeal has been progressed on these terms. 3.11 At the time of making this submission, Ryden (on CALA's behalf) has sought clarification from WLC regarding this proposed change. In particular, CALA is keen to understand whether a separate schools catchment area review and consultation has taken place to justify the proposed amendment to the Proposed Plan. 3.13 WLC has confirmed by email on 11 November that the Boghall East site does in fact still fall in to the catchment area for Springfield Primary school and that the change was a drafting error. However, CALA reserves their position until the Proposed Plan has been amended to rectify this mistake. Sequential Approach to Housing Site Selection 3.14 At paragraphs 5.65/5.66 the Proposed Plan sets out the sequential approach to new residential development in Linlithgow/Linlithgow Bridge. In essence, this prioritises brownfield sites within the current settlement boundary, then appropriate and suitable greenfield sites within the current settlement boundary and thereafter, greenfield release outside the current settlement boundary. 3.15 CALA objects to the application of this approach as it is not appropriate for determining which housing sites should be delivered in advance of others. The sole purpose of the Plan's housing land development strategy is to deliver the requirement set out in SESplan with a particular focus on the shortfall identified across the period up to 2019. On this basis, it is effective sites capable of being delivered pre-2019 and in doing so, making contributions towards the delivery of the Winchburgh schools, which should be prioritised. 3.16 CALA's site at Boghall East is a greenfield site which lies within the settlement boundary. It falls behind brownfield sites when the sequential approach of the Proposed Plan is applied, yet it is a more deliverable site than those sites. Through the planning application and ongoing appeal process, CALA has confirmed that the site is; • In the ownership of a party who will release it to CALA Homes in the event planning permission is granted. • Free from physical constraints, flood risk, access issue and contamination risk. Services infrastructure is available to support this proposed housing development. Education services are available to support this development at both primary school and secondary school levels. • Does not require public funding. • Occupies a highly marketable location for new housing. • Deliverable by 2019. The site would therefore make an early contribution to the effective housing land supply to 2019 to assist towards achieving a five year supply of effective housing land. 3.17 CALA's site is allocated in the Proposed Plan and is an appropriate and suitable greenfield site within the settlement boundary. It has been demonstrated to be effective and can be delivered pre-2019 and on this basis, only brownfield sites allocated in the Proposed Plan could be prioritised over the appeal site if the sequential approach is applied. 3.18 The allocated brownfield sites are; • 81-87 High Street (HLi27). • Falkirk Road, Land at BSW Timber (EOI-105). • Clarendon House (EOI-0184). 81-87 High Street (HLi27) 3.19 Site HLi27, High Street has planning consent for 41 units restricted to occupation by residents over the age of 55 and construction has already commenced. It will not provide much needed family housing and has no impact on the existing school estate in Linlithgow. Falkirk Road, Land at BSW Timber (EOI-105) 3.20 The site at Falkirk Road is owned by BSW Timber who have vacated the property. It is identified in the Proposed Plan for residential development of 18 units. 3.21 In assessing the effectiveness of this site to support their appeal submission, CALA undertook a full assessment of its developability including an indicative layout and development appraisal. The work concludes that the site is severely constraint as detailed below; • The junction to Falkirk Road cannot be achieved in line with WLC Road Standards. The available title at the road renders sightlines deficient. • From Falkirk Road, the access to the site is via an existing private track. The track is owned by BSW, although a single bungalow (Lochmill House) also utilises the route. This bungalow has a right of access over the track. Agreement from the proprietor of the bungalow will be required to restrict the use of the track during construction period. • A pinch-point between the bungalow and adjacent title of "Ganavan" means that insufficient width is available to permit construction of an adoptable road and pedestrian footway/service area. The developer is required to provide the bungalow with continued means of access to their existing driveway. 3.22 It is clear that agreement with 3rd party landowners is essential to access the site. Therefore, it is ransomed in two separate locations; at the junction with Falkirk Road, and by Lochmill House. The site is not effective in terms of ownership. 3.23 Subject to solving the above issues the site is capable of accommodating a limited scale of residential development. That said, it lies immediately adjacent Edinburgh-Glasgow railway line. It sits at grade and the same level as the site, as such noise impact from this very busy commuter line will be significant. Consequently, the site is not an attractive proposition for family housing. Its potential limited to smaller accommodation, potentially starter homes of 1 and 2 bedroom properties. 3.24 The potential land value of the site, for this type of development is of a modest scale and unlikely to attract a significant level of interest. Clarendon House (EOI-0184) 3.25 This is a listed building, owned by West Lothian Council and allocated (in part) as a housing site for up to 8 units. Its development is supported by an approved Development Brief, 3.26 The most significant physical constraint relates to drainage and flooding with downstream, cumulative run-off impact a particular issue. WLC confirms through the Proposed Plan that development at this site is likely to require the developer to invest in additional off-site engineering in order to provide capacity in the combined sewer system. 3.27 The site also lies within the catchment for Low Port Primary School. Evidence from the appeal decision for the adjoining site (Clarendon Farm) found that the impact on that school roll was an insurmountable problem, for which there is currently no solution. Conclusions - Brownfield Site Assessments 3.28 The brownfield sites in

Linlitheow as allocated within the Proposed Plan, are expected to contribute some 67 units in total. Of that total 41 units will not carry any education requirements. The site at the Former Bus Depot is not allocated but has planning permission for residential development restricted 9. APPENDICES ((staged: 99)) residents over 55 years of age and as a consequence, will have no impact on the school estate. 3.29 The two remaining sites at Falkirk Road (BSW Timber) and Clarendon House will contribute a maximum of 26 units. The former has previously been refused consent for A number of appendiate and is severely reportance of the provided by weaver is a severely the provided of the severely of accessibility. At best this site could come forward for a much smaller proposal if all constraints were resolved. Ilevertheless, it is Do you wish to males accuable retained and use to take on this site given all of the issues identified and likely end value. It is not effective. 3.30 It is debateable whether the allocation at Clarendon House is currently effective but in any event, this site will contribute a maximum of only 8 units to the effective housing land supply. 3.31 The CALA site at Boghall East is effective, it is an appropriate and suitable greenfield site C yes within the settlement boundary and must be prioritised in light of the above conclusions. Other brownfield sites allocated cannot guarantee delivery of housing pre-2019 and as such, development at Boghall East will not prevent those sites coming forward. 3.32 The Plan must enable no effective sites which can deliver the housing requirement as a priority and if necessary, over other allocated sites which are defined more favourably under the Plan's sequential test. The sequential approach adopted in the Plan is therefore flawed and must be amended accordingly. 4. Summary of CALA's Representation 4.1 CALA supports in principle the allocation of the site at Boghall East (H-LL3) for If you wish to make idominiates piece ablegativity getechting the itelevant congrege and itelevant to the piece ablegativity of the piece ablegativity of the piece ablegativity of the which can help to deliver the housing land requirement pre-2019 and is capable of making contributions towards the delivery of the Appendix 1 - Despite assurances from WLC that the inclusion of Boghall East in the catchment area for Low Port Primary is a dratting error, CALA maintains being the primary is a dratting error, CALA maintains and equeration of Boghall East in the catchment area for Low Port Primary is a dratting error, CALA maintains and equeration of Boghall East in the catchment area for Low Port Primary is a dratting error, CALA maintains and equeration of Boghall East in the catchment area for Low Port Primary is a dratting error, CALA maintains and equeration of Boghall East in the catchment area for Low Port Primary is a dratting error, CALA maintains and equeration of Boghall East in the catchment area for Low Port Primary is a dratting error, CALA maintains and equeration of the second part of the second part of the second part of the primary is a dratting error, CALA maintains and error of the second part of the second part of the prime error, the primary is a dratting error, CALA maintains and error, the primary is a dratting error, the primary err addressing the shortfall in the period to 2019. The Ministerial appeal decisions in respect of proposals for Burghmuir and Clarendon, both in Appendix 5 - Linit the Boolities downer 2200ar marker for WLC in terms of housing land supply shortfall and what is required by the LDP review. The sequential approach propose 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)

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)

## 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?

- O 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?

- O 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.

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	
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?

- O 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.