

West Lothian Local Development Plan Main Issues Questionnaire

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West Lothian
Council

The council has commenced preparation of its first *Local Development Plan* (LDP). The LDP will replace the *West Lothian Local Plan* and will set out a local interpretation of the requirements of the *Strategic Development Plan* (SESplan) and national guidance. The LDP is a land use plan that identifies site specific development opportunities, sets out the council's key development priorities and provides the policy context for the consideration of applications for planning permission.

The current *West Lothian Local Plan* was adopted by the council in January 2009 is available to view on the council's website at <http://www.westlothian.gov.uk/WLLP>

The *Main Issues Report* (MIR) for the West Lothian LDP is the first key stage in the preparation of the LDP and we are seeking your views on this. All documentation for the MIR can be viewed at <http://www.westlothian.gov.uk/MIR>

Full details on the timetable and stages for preparing the LDP are set out in the Development Plan Scheme 6 which is also available online: <http://www.westlothian.gov.uk/article/2725/Development-Plan-Scheme>

A questionnaire to accompany the MIR is set out below and we would be happy if you would complete and return to us.

There are 98 questions that accompany the *Main Issues Report*. You do not have to respond to all of the questions set out only those which you feel are of particular relevance to you. Completed questionnaires should be returned to us by e-mail to wlldp@westlothian.gov.uk by no later than **5pm on Friday, 17 October 2014**.

Alternatively, please download a copy of the form and send it to us at: Development Planning, West Lothian Council, County Buildings, High Street, Linlithgow, EH49 7EZ (postal address only).

You can keep up to date on the LDP by subscribing to our LDP e-newsletter. If you have not already subscribed, you can do so by going to the following link and following the relevant instructions:

<https://newsletters.westlothian.gov.uk/eNewsletterPro/optin/optinealert.htm>

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| Name | <input checked="" type="radio"/> Mr <input type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <i>(please tick as appropriate)</i> |
| Organisation <i>(where applicable)</i> | |
| Postal address | |
| Postcode | |
| E-mail | |
| Telephone | |

Please note that any comments you make will be open to public scrutiny, but we will keep your contact details private and confidential and will only use your name or business name.

By filling in this questionnaire you are helping to shape the future of West Lothian

It would also be helpful if you would complete the *Equal Opportunities Questionnaire*, set out at the end of this document.

Local Development Plan Vision Statement

By 2024 West Lothian's population will have grown and an improved employment position within a more diversified local economy will have been established. It will be better connected by road and public transport and will have a greater choice of housing and an appropriate range of education, community, health, retail, recreation and leisure facilities and a network of green spaces to meet the needs of its growing population. Development will take place in a sustainable way that protects and improves the area's built and natural heritage assets, meets the challenges of climate change and renewable energy and helps regenerate deprived areas and improves the quality of life for people living in West Lothian.

Question 1

Do you agree with the *vision for the LDP*, or, are there other aspects that should be considered?

YES NO Don't know

Do you have any additional comments?

Question 2

Do you have an alternative vision, and if so, what is it?

The aims of the *Main Issues Report* and Associated Main Issues are set out in pages 13 of the MIR.

Question 3

Do you agree with the proposed 'Aims' of the LDP? If not, why not?

Question 4

Do you have an alternatives, and if so, what are they?

Main Issue 1: Economic Development and Growth (paragraphs 3.1 - 3.31)

Which areas of West Lothian would be best to direct new economic development towards?

How can the LDP support the council's *Economic Strategy* and facilitate the creation of jobs?

Preferred approach

The council's *preferred approach* to employment land is to review the range of uses which could be accommodated on employment land with a view to accommodating a more flexible approach. This flexible approach will involve removing the single user status of two large sites (Linhouse and Eliburn in Livingston), and allowing a wider range of uses on currently allocated employment sites at locations to be identified in the LDP. Such an approach, for example, would apply to certain traditional employment allocations and industrial estates such as East Mains Industrial Estate, Broxburn and Deans & Houstoun Industrial Estates, Livingston and at Whitehill and Whiteside Industrial Estates, Bathgate and Murraysgate, Whitburn reflecting the broad range of uses which already exist at these locations and to allow for other employment/commercial orientated uses to be accommodated e.g. car showrooms, trade centre outlets and certain leisure uses.

The LDP will continue to support development of existing employment allocations, including sites within the core development areas, and support the servicing of employment allocations to assist in attracting inward investment. New employment land allocations will also be identified to supplement and in some cases complement the existing supply, including a new strategic employment site at Balgornie adjacent to the recently opened Junction 4a on the M8 at Whitburn.

In addition, the LDP will seek to encourage small business development by promoting small workshop developments within communities and home working in appropriate locations. In a limited number of cases, existing employment land is identified as being suitable for potential residential development.

The council's preferred use of the former Vion plant in Broxburn is to allocate the site for housing.

The preferred approach would also include meeting the requirements of the SDP in full.

Alternative approach

The council's '*Alternative*' approach to employment land is to restrict the range of uses which can be accommodated on employment sites, and to seek to augment the existing portfolio (including Linhouse) by identifying new strategic or local employment sites beyond existing allocations and SESplan requirements to maximise land availability and choice for potential employers. This would, however, result in an oversupply of employment land and could see large employment estates located in non-sustainable, greenfield locations that could have associated local traffic, infrastructure and environmental impacts.

In relation to the former Vion plant at Broxburn the council's alternative approach is to continue to allocate the site for employment use.

Question 5

Do you agree with the 'Preferred' approach to employment land which would introduce an opportunity for a broader range of land use to be supported within existing employment land allocations and industrial estates?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 6

Do you agree with the 'Alternative' approach to employment land?

YES NO Don't know

Do you have any additional comments?

Question 7

Do you have any other alternative approaches? What are they and how would you make them work?

Question 8

Has the council identified enough employment land in West Lothian to meet requirements and are the larger employment sites in the right locations?

YES NO Don't know

Do you have any additional comments?

Question 9

Do you agree that the single user employment site at Linhouse, Livingston (ELv54) should be sub-divided for employment and mixed uses, including residential use of up to 250 houses?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 10

Do you agree that the former strategic employment allocation at Eliburn, Livingston (ELv25) should continue to be promoted for employment uses but not as a single user site?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 11

Do you agree that a site at Baggornie Farm, north of Whitburn, should be allocated for strategic employment land purposes?

If not, why not?

What other locations would you suggest?

YES NO Don't know

Do you have any additional comments?

Main Issue 2: **Community Regeneration** (paragraphs 3.31 - 3.34)

Where should the focus for community regeneration in West Lothian be and what should this seek to deliver?
How can the LDP incentivise development to take place within regeneration areas?
How can the LDP support the council's Regeneration Plan?

Preferred approach

The council's preferred approach to community regeneration is to focus regeneration initiatives on areas identified in the Scottish Index of Multiple Deprivation 2012. This principally includes the smaller settlements in the west of West Lothian identified as Armadale, Blackburn, Blackridge, Fauldhouse, Stoneyburn and Whitburn. Other areas include Bathgate and Boghall and settlements within the Breich Valley where headline levels of disadvantage including unemployment, financial exclusion, poor health and lower education attainment have been identified.

These communities are often characterised by a range of factors which can include high levels of unemployment, low income, lower levels of education attainment, and access to services. To create more balanced communities, address issues of multiple deprivation and to attract private sector investment it is proposed to seek to identify initiatives to generate more investment in these communities.

Alternative approach

The council's alternative to community regeneration is to not pursue regeneration objectives through the development plan and to rely solely on other council led regeneration initiatives.

Question 12

Do you agree with the 'Preferred' approach to community regeneration in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 13

Do you agree with the 'Alternative' approach to community regeneration in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 14

Do you have any other alternative approaches?

What are they and how would you make them work?

Main Issue 3: **Housing Growth, Delivery and Sustainable Housing Locations** (paragraphs 3.35 - 3.63)

How much new housing is required in West Lothian?

Where should new housing development take place, and where should it not be encouraged?

How can the risks associated with the existing development strategy as set out in the *West Lothian Local Plan* be reduced?

How can the rate of house building in West Lothian be increased to ensure that the required five year effective housing land supply is achieved and that the assessed housing need and demand is met in full over the plan period?

Preferred Strategy

The council's preferred strategy is scenario 3 to provide for more housing than the minimum required by the supplementary guidance required to support the SDP and the LDP should allocate housing land for an additional 3,500 houses above existing committed development. This would result in a level of development beyond requirements set out in the housing supplementary guidance to support the SDP. However, this scenario is only preferred if the council can be satisfied that the infrastructure required to support this scale of development can be delivered in full and also in recognition that it is not anticipated that this increased allowance will be delivered by 2024 but is there to allow for the delivery of development into the period 2024-2032.

This recognises that the strategy in the existing adopted local plan is reliant to some extent on a limited number of large, complex sites with high infrastructure costs being brought forward. It is now considered that a range of smaller housing sites, in various locations across West Lothian, is needed in order to provide for greater choice and effectiveness of sites, introduce local flexibility for the LDP and to ensure that a generous housing land supply is available, providing as a minimum, an effective five year housing land supply at all times, as required by SPP.

There is also a need to sustain the momentum built up in some of the existing large housing growth areas and make sure that these developments are viable going forward. Modest additional allocations in some of these areas will provide a degree of future proofing of the plan and help meet part of the need and demand for housing beyond the end of the plan period. Much of the existing housing land supply in core development areas and elsewhere will not be built out within the plan period and allocating additional housing sites in these areas through the LDP will help to maintain investor confidence and inform investment planning.

The allocation required by the draft supplementary guidance prepared by SESplan of 2,130 new houses beyond existing allocations of 22,847 units provides for a total of 24,977 units over the period 2012-2024.

By contrast, the preferred strategy proposes 26,347 houses which provides 3,500 houses above the base supply houses which is an increase of around 15% above the base supply.

This scale of housing allocation will reduce the risk of the LDP development strategy not being successful and is justified on the basis of:

- the need to maintain a five year supply of effective housing land at all times as required by Scottish Government planning policy;
- the need to ensure that there is a generous supply of housing land to accommodate the needs and demands of those seeking a house in West Lothian;
- the need to maintain West Lothian's attractiveness as an area which provides a range and choice of housing sites for those wishing to invest;
- linking the council's Economic Strategy to that of the housing market by providing a range and choice of house types suitable to indigenous and inward investors and the construction industry;
- providing for future affordable housing build programmes;
- continuing to redevelop appropriate brownfield sites;
- allowing the WLLP core development allocations and the strategic allocation at Heartlands, Whitburn to deliver over the long term whilst achieving the five year effective supply through the allocation of predominantly small to medium sized sites where requirements for infrastructure to assist delivery are less onerous on developers;
- allocating above 3,500 will generate the need for a 4th new secondary school which will be expensive to deliver in addition to existing infrastructure commitments;
- replacing allocations in the adopted *West Lothian Local Plan* which may no longer be supported by the site owners or due to reasons of development viability; and
- recognising that as the LDP progresses some housing sites may be delayed or may no longer come forward for a variety of reasons including unexpected development viability.

The preferred strategy is based around an aspiration for growth aimed at delivering sustainable economic prosperity and quality of life for communities in West Lothian and in particular building on the existing significant core development area allocations and strategic sites and will provide a broader range of housing sites.

Alternative Strategy 1

Alternative Strategy 1 reflects scenario 2 set out above and proposes that the LDP should allocate housing land for an additional 2,600 houses, above existing committed development. This would result in a level of development beyond SDP requirements set out in the draft supplementary guidance.

This proposes allocating land for 25,447 houses i.e. 2,600 houses above existing commitments to provide a housing land supply which is around 1.4% more than SDP requirements. This alternative strategy 1 is a variation on the preferred strategy but with a smaller increase in housing allocations above the minimum requirement in the SDP. Whilst Alternative Strategy 1 will provide more choice than Alternative Strategy 2 (see below) there is a risk that the housing supply will not be regarded as sufficiently generous and that an effective five year housing land supply will not be available at all times because existing large sites are taking longer to get underway and build out. This could mean that other sites not allocated for development could be promoted for development and receive planning permission contrary to the development plan. Where the five year land supply is not maintained this could leave the council open to planning by appeal.

Alternative Strategy 2

Alternative Strategy 2 reflects scenario 1 set out above and proposes that the LDP allocates housing land for an additional 2,130 houses above existing committed development. This would result in the requirement set out in the draft supplementary guidance being met but would not allow for any flexibility. A total of 24,977 houses, i.e. 2,130 houses above existing commitments, as required by the supplementary guidance for the SDP but with no flexibility allowance for additional development. This strategy represents a view that West Lothian should grow more slowly.

Whilst this alternative strategy may have certain attractions in terms of minimising impact on the environment and the need for additional infrastructure, it may mean that an effective five year housing land supply is not maintained at all times and could lead to relative economic decline whereby neighbouring authorities supporting higher growth scenarios, are better placed to take advantage of a potential economic upturn and recovery. Where the five year land supply is not maintained this could leave the council open to planning by appeal.

All of these reasons require to be balanced against the need to secure sustainable well located development, protect important environmental assets and landscapes of West Lothian and to have regard to impacts on existing communities and existing and future infrastructure requirements which are likely to arise. This will allow the LDP to focus on improving the quality of our existing established communities, facilities and environment as opposed to being negative in terms of other authorities benefitting from an upturn and the issue of planning by appeal and review a potential increase in housing numbers in the next LDP if economic recovery has indeed taken place in the first plan period.

Question 15

Do you agree with the 'Preferred' strategy for housing growth in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 16

Do you agree with 'Alternative Strategy 1' for housing growth in West Lothian?

If so, why?

YES NO Don't know

Do you have any additional comments?

Question 17

Do you agree with 'Alternative Strategy 2' for housing growth in West Lothian? If so, why?

Question 18

Do you have another alternative strategy?

What is it and how would you make it work?

Question 19

How can the council maintain an effective five year housing land supply given the current economic climate?

Preferred and alternative options for housing sites, including potential de-allocations from the *West Lothian Local Plan* (paragraphs 3.64 – 3.73)

Preferred Option

The council's preferred option is that some housing sites allocated in the adopted *West Lothian Local Plan* and identified in Housing Land Audit 2012 are not included in the LDP. Details of sites are set out in the Settlement Statements accompanying the MIR.

Alternative Option

The council's alternative option is that all housing sites allocated in the adopted *West Lothian Local Plan* and identified in Housing Land Audit 2012 be included in the LDP.

Question 20

Do you agree with the 'Preferred' option for the removal of existing housing allocations from the development plan?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 21

Do you agree with the 'Alternative' option for the removal of existing housing allocations from the development plan?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 22

Do you have any other alternative options?
What are they and how would you make them work?

YES NO Don't know

Do you have any additional comments?

Preferred Approach to the Core Development Areas

The council's 'Preferred' approach to the core development areas is to continue to support their delivery and allow for further longer term allocations at Winchburgh.

Alternative Approach to the Core Development Areas

The council's 'Alternative' approach is not to allow for any further development beyond that set out in approved master plans and the *West Lothian Local Plan*.

Question 23

Do you agree with the 'Preferred' approach to the core development areas?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 24

Do you agree with the 'Alternative' approach to the core development areas?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 25

Do you have any other alternative options?

What are they and how would you make them work?

YES NO Don't know

Do you have any additional comments?

Preferred Approach to Heartlands, Whitburn

The council's 'Preferred' approach to Heartlands, Whitburn is to look favourably on proposals for additional housing within the existing housing allocation, subject to infrastructure constraints being resolved.

Alternative Approach

The council's 'Alternative' approach is that the number of houses at "Heartlands" be restricted to 2,000.

Question 26

Do you agree with the 'Preferred' approach to Heartlands, Whitburn?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 27

Do you agree with the 'Alternative' approach to Heartlands?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 28

Do you have any other alternative options?

What are they and how would you make them work?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach to Linlithgow is that the "area of restraint" be re-considered to allow for greenfield release of housing, employment and potential tourist related development. Should the area of restraint be removed, any development would be dependent upon the delivery of a new secondary school at Winchburgh and therefore would be focussed principally in latter plan period. Any land release would follow a sequential approach as set out in paragraph 3.93

Alternative approach

The council's 'Alternative' approach to Linlithgow is that the "area of restraint" approach be maintained and that development be directed to brownfield opportunities within the existing settlement boundary in the first instance and thereafter greenfield release within the town.

Question 29

Should the definition of Linlithgow as an 'area of restraint' be removed, and if so, how should the town be developed in the future?

YES NO Don't know

Do you have any additional comments?

Should a sequential approach be applied to the release of land in and around Linlithgow to accommodate any new development?

YES NO Don't know

Do you have any additional comments?

Question 30

What alternatives are available in order to meet demand for housing (including affordable housing) and employment land opportunities in Linlithgow?

Question 31

Should land continue to be safeguarded for west facing slip roads on the M9 at Junction 3, Linlithgow?
If so, should new development be promoted in Linlithgow to ensure that funding for these can be secured?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach to the Deans South estate, Livingston, is that the area be identified for comprehensive redevelopment for approximately 300 new houses.

Alternative approach

The council's 'Alternative' approach to the Deans South estate, Livingston, is that the LDP should not identify the area for comprehensive redevelopment for approximately 300 new houses.

Question 32

Do you agree with the 'Preferred' approach for addressing the Deans South estate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 33

Do you agree with the 'Alternative' approach for addressing the Deans South estate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 34

Do you have any other alternative approaches?

What are these and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach to affordable housing is to review the terms of the current affordable housing policy and set this out in supplementary guidance.

Alternative approach

The council's 'Alternative' approach to affordable housing is to continue to implement existing policy.

Question 35

Do you agree with the 'Preferred' approach to affordable housing? If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 36

Do you agree with the 'Alternative' approach to affordable housing? If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 37

Do you have any other alternative approaches? What are they and how would you make them work?

YES NO Don't know

Do you have any additional comments?

Main Issue 4: Infrastructure Requirements and Delivery

How can we ensure that new development in West Lothian makes best use of existing infrastructure?

How can we make sure that the cost of providing new infrastructure needed to support new development does not fall unduly on the tax payer?

How can we ensure that developer contribution costs are affordable and do not make the development of sites unviable?

Infrastructure requirements and delivery – providing for community needs: education, healthcare and sports facilities

Preferred approach

The council's 'Preferred' approach to infrastructure provision, in particular education provision, is to promote additional growth which can for the most part utilise existing infrastructure capacity, and minimise additional significant new infrastructure requirements over and above existing planned upgrades and requirements. Developer contributions will continue to be sought, the basis for which will be set out in a combination of generic and specific supplementary guidance. The council's preferred approach to infrastructure delivery is supported by Policy 9 of the SDP. The preferred approach is also to further develop funding mechanisms and supplementary guidance to assist in delivery.

Alternative approach

The council's 'Alternative' approach to infrastructure provision is not to promote growth particularly that which would require substantial investment in new infrastructure given the current limited ability of the development industry to deliver up-front funding for infrastructure projects. Such an approach, however, is unrealistic and contrary to national planning policy.

Question 38

Do you agree with the 'Preferred' approach to infrastructure provision? If not, why not?

YES NO Don't know

Do you have any additional comments?

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Question 39

Do you agree with the 'Alternative' approach to infrastructure provision?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 40

Do you have any other alternative approaches?

What are they and how would you make them work?

YES NO Don't know

Do you have any additional comments?

Question 41

How can the level of infrastructure required to support the scale of development proposed be delivered?

Do you have any additional comments?

Infrastructure – transport and access in and around West Lothian (*paragraphs 3.132 – 3.159*)

Preferred approach

The council's 'Preferred' approach to promoting access to/from/within West Lothian is to address outstanding constraints in the strategic and local road network which are essential to accommodate community growth and in particular economic and housing growth and tackle existing traffic issues whilst promoting sustainable transport measures on an incremental basis in conjunction with new development, and as resources allow. Within this, the preferred approach is to promote development on or very near to existing public transport facilities or where there is potential for new facilities. This approach will help to sustain and improve services which in turn will become more attractive alternatives to the private car.

Alternative approach

The council's 'Alternative' approach to promoting access to/from/within West Lothian is to shift emphasis away from addressing road network issues to focus exclusively on sustainable transport measures, however, this is not considered a reasonable alternative given the commitment to strategic road improvements through NPF2, the SDP and the need to accommodate existing committed development across West Lothian.

Given physical, policy and resource constraints, it is not considered that there are any other reasonable alternatives to the preferred approach.

Question 42

Do you agree with the 'Preferred' approach to promoting access to/from/within West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 43

Do you agree that the council should continue to work towards the provision of a new rail station at Winchburgh?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 44

Do you have any other alternative approaches?
What are they and how would you make them work?

YES NO Don't know

Do you have any additional comments?

Main Issue 5: **Town Centres and Retailing** (paragraphs 3.160 – 3.171)

What do we need to do to promote and sustain our traditional town centres in West Lothian and consolidate the sub-regional centre at Almondvale, Livingston?

Preferred approach

The council's 'Preferred' approach to town centre retail provision in West Lothian is to:

- sustain and improve town centres by applying the sequential approach to proposals for retail and leisure development;
- reduce leakage from some areas in accordance with the council's Retail Capacity Study;
- facilitate the creation of a new town centre in Winchburgh;
- safeguard existing and promote new local neighbourhood centres: and
- bring about village and town centre improvements by highlighting development opportunities, supporting the development of brownfield sites, implementing improvements through the capital plan and, where appropriate, securing developer contributions.

The preferred approach includes removing retail policy restrictions currently in place in Bathgate and Linlithgow town centres to allow for a broader range of uses which will support the take up of empty units. In addition, initiatives to support and promote development above shops will be encouraged, subject to availability of infrastructure and to the operation of existing business premises not being unduly prejudiced.

Alternative approach

The 'Alternative' approach is to:

- sustain and improve town centres by applying the sequential approach to proposals for retail and leisure development;
- reduce leakage from some areas in accordance with the council's Retail Capacity Study;
- facilitate the creation of a new town centre in Winchburgh;
- safeguard existing and promote new local neighbourhood centres: and
- bring about village and town centre improvements by highlighting development opportunities, supporting the development of brownfield sites, implementing improvements through the capital plan and, where appropriate, securing developer contributions.

This approach excludes removing current retail policy restrictions in place in Bathgate and Linlithgow town centres.

Question 45

Do you agree that the 'Preferred' approach to town centres and retail provision in West Lothian is appropriate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 46

Do you agree with the 'Alternative' approach to town centres and retail provision in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 47

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Main Issue 6: The Natural and Historic Environment (paragraphs 3.172 – 3.213)

How can planning policy promote sustainable patterns of development to protect our valued landscapes, built and cultural heritage and create a green network across West Lothian?

Preferred approach

The council's 'Preferred' approach to the West Lothian natural environment is to direct development to appropriate brownfield sites within settlements in the first instance but also to bring forward the release of greenfield sites in sustainable locations where there are no alternatives in order to meet strategic requirements. When considering greenfield release the council will have regard to the LLDR and other relevant factors, particularly sustainability but also issues of townscape and settlement coalescence. This may allow for some release of new development sites on the edge of settlements, thereby maximising use of existing infrastructure, whilst protecting visual amenity and the biodiversity value of the countryside and preventing coalescence of settlements.

In some instances it may be necessary to extend countryside and landscape designations to protect the purposes for which the land was designated be it landscape value, landscape character and landscape enhancement, buffers to coalescence of settlements, protection of prime quality agricultural land and historic gardens and designed landscapes in West Lothian.

Alternative approach

The 'Alternative' approach to the West Lothian natural environment and landscapes is to focus less on brownfield land and allow parts of designated areas to be released for housing or employment development.

Question 48

Do you agree with the 'Preferred' approach to the natural environment in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 49

Do you agree with the 'Alternative' approach to the natural environment in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 50

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Landscape approach and designation (*paragraphs 3.172 - 3.170*)

Preferred approach

The council's 'Preferred' approach to landscape designations is to reduce the number of landscape designations in order to reflect the findings of the Local Landscape Designation Review and identify candidate Special Landscape Areas (cSLA). Special Landscape Areas will replace AGLVs and Areas of Special Landscape Control. This approach is in accord with best practice and guidance prepared by Scottish Natural Heritage and Scottish Government.

Alternative approach

The council's 'Alternative' approach to landscape designations is to continue with the current approach, relying on existing policies and designations. This would not achieve the goal of updating and simplifying landscape designations in accordance with current best practice and national guidance.

Question 51

Do you agree with the 'Preferred' approach to landscape designations in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 52

Do you agree with the 'Alternative' approach to landscape designations in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 53

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Development in the countryside (*paragraphs 3.180 – 3.181*)

Preferred approach

The council's 'Preferred' approach to housing development in the countryside is to continue to support development in appropriate circumstances for example, sensitive redevelopment of steadings; limited enabling development to secure restoration of historic buildings or structures; and replacement of houses in a habitable condition. Existing Supplementary Guidance will be updated to clarify the circumstances in which development will be permitted, and the design standards expected. The current flexibility in policies on business and tourism development in the countryside will be maintained and it is proposed to carry forward the existing policy on 'very low density rural housing in the countryside' otherwise known as 'lowland crofting' but only in the west of West Lothian.

Alternative approach 1

The council's first 'Alternative' approach to housing development in the countryside is to allow relaxations to current policies, potentially by permitting more redevelopment of rural brownfield land for housing. However, this approach is inherently non-sustainable as it would result in development which is remote from services and could lead to a proliferation of undesirable, sporadic development in the countryside.

Alternative approach 2

The council's second 'Alternative' approach to housing development in the countryside is not to maintain the current policy approach. This would include a review of the current 'lowland crofting' policy.

Question 54

Is the 'Preferred' approach to housing development in the countryside appropriate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 55

Do you agree with any of the 'Alternative' approaches to housing development in the countryside?

YES NO Don't know

Do you have any additional comments?

Question 56

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Business, tourism and recreational uses in the countryside (*paragraph 3.182*)

Preferred approach

The council's 'Preferred' approach to business, tourism and recreational uses in the countryside is to generally continue with the current policy approach set out in existing supplementary guidance.

Alternative approach

The council's 'Alternative' approach to business, tourism and recreational uses in the countryside is to allow relaxations to current policies. However, this approach could lead to a proliferation of undesirable development in the countryside.

Question 57

Do you agree with the 'Preferred' approach to business, tourism and recreational uses in the countryside?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 58

Do you agree with the 'Alternative' approach to business, tourism and recreational uses in the countryside?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 59

Do you have an alternative approach?
What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Green Networks, and extension to Pentland Hills Regional Park (*paragraphs 3.183 – 3.189*)

Preferred approach

The council's 'Preferred' approach to the green network is to define the part of CSGN in West Lothian as a network of multi-functional green corridors focussing on the existing network. This would build on the existing initiatives extending the network into the rural hinterland to connect with adjacent local authorities existing and emerging networks, and penetrating into urban areas, linking with the council's Open Space Strategy and Core Paths Plan.

Alternative approach

The council's 'Alternative' approach to the green network is to maintain the existing green spaces in their present form, with a clear urban fringe focus. This would continue to prioritise resources closest to the places people live and work, but would fail to capture the wider focus of the CSGN to link existing and new green spaces into wider multi-functional green networks.

Question 60

Do you agree with the 'Preferred' approach to the green network in West Lothian?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 61

Does the proposed West Lothian wide green network capture the best strategic opportunities or are there any missing links?

YES NO Don't know

Do you have any additional comments?

Question 62

Do you have any suggestions for a green network across West Lothian?

YES NO Don't know

Do you have any additional comments?

Question 63

Do you have any suggestions for a green network across West Lothian?

YES NO Don't know

Do you have any additional comments?

Question 64

Do you have an alternative approach? What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Question 65

What are your views on the proposed extension to the Pentland Hills Regional Park in West Lothian?

YES NO Don't know

Do you have any additional comments?

Biodiversity and Geodiversity (*paragraphs 3.190 – 3.197*)

Preferred approach

The council's 'Preferred' approach to biodiversity and geodiversity sites is to review and update the existing list of locally designated sites (Wildlife Sites and Regionally Important Geological/Geomorphological Sites RIGS) and to protect and promote improvements to them through Supplementary Guidance where appropriate. Policy protection for carbon-rich soils will be reinforced.

Alternative approach

The council's 'Alternative' approach to biodiversity and geodiversity sites would be not to promote Supplementary Guidance, but simply to map local sites within the LDP as at present. Whilst this might give the sites more prominence within the LDP, the process would be less functional.

Question 66

Do you have any general or specific issues with the proposed list of Local Biodiversity Sites and Local Geodiversity Sites?

YES NO Don't know

Do you have any additional comments?

Question 67

Do you agree with the 'Preferred' approach to Biodiversity and Geodiversity in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 68

Do you agree with the 'Alternative' approach to Biodiversity and Geodiversity in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 69

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

West Lothian Open Space Strategy 2005-2015 (paragraph 3.198)

Question 70

Do you have any views on what should be considered for the second Open Space Strategy for 2015/16?

Why should these be considered?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach to the historic environment is to review the current range of policies related to the historic environment, updating where necessary to reflect changes in legislation, and to prepare supplementary guidance to protect and promote built heritage assets and to consider designating conservation areas at Abercorn village and Hopetoun Estate. In addition, conservation area appraisals of all conservation areas will be progressed where resources allow.

Alternative approach

The council's 'Alternative' approach to the historic environment is to maintain the current approach to the historic environment and not to promote a conservation area at Abercorn village and Hopetoun Estate.

Question 71

Is the 'Preferred' approach to the historic environment in West Lothian appropriate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 72

Do you agree with the 'Alternative' approach to the Historic Environment in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 73

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach to Bangour Village Hospital site is to support at least 550 houses at the site, with the precise number of houses being agreed through detailed assessment of a master plan and other supporting information. Delivery of the site will be allied to the delivery of the infrastructure required to support the development whilst having regard to the built and natural environmental sensitivities of the site.

Alternative approach

The council's 'Alternative' approach is that housing development at the Bangour Village Hospital site should be restricted to 500 units.

Question 74

Is the 'Preferred' approach to Bangour Village Hospital appropriate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 75

Do you agree with the 'Alternative' approach to Bangour Village Hospital?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 76

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach to the former Bangour General Hospital site is to assess development proposals against development in the countryside policies in the LDP.

Alternative approach

The council's 'Alternative' approach to the Bangour General Hospital site is to maintain the policy presumption in favour of development as set out in the *West Lothian Local Plan*.

Question 77

Is the 'Preferred' approach to Bangour General Hospital appropriate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 78

Do you agree with the 'Alternative' approach to Bangour General Hospital?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 79

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach to the Union Canal is to promote its tourism and recreational potential and to allow for sympathetic ancillary development at the most appropriate locations along its length, having regard as to how this best fits with the wider strategy being developed by Scottish Canals for the whole waterway and in consultation with other neighbouring local authorities.

The canal also has potential to be used as a means of sustainable transport, both for leisure and commercial purposes, and it is important that opportunities to enhance local use, access and bio-diversity are maximised.

Securing the long term maintenance of this important historic structure is also paramount and it is concluded that this is best achieved by ensuring that it is well used and has as diverse a range of functions as practicable.

The rural setting of the section of the Union Canal between Winchburgh and Broxburn should continue to be protected as countryside belt or as a candidate special Landscape Designation Area as identified in the draft Local Landscape Designation Review.

Alternative approach

The council's 'Alternative' approach to the Union Canal is that no development, on or directly abutting it, and particularly in the countryside between Broxburn and Winchburgh, should be permitted. This is considered necessary in order to maintain the established setting of the Union Canal and to conserve its historic fabric. The only concession would be for necessary maintenance or for works to improve the canal and public access to it.

Question 80

Is the 'Preferred' approach to the Union Canal appropriate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 81

Do you agree with the 'Alternative' approach to the Union Canal?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 82

Do you have an alternative approach?
What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Public Art (*paragraph 3.213*)

Preferred approach

The council's 'Preferred' approach to public art is to continue to seek developer contributions appropriate to the scale and type of development and to review supplementary guidance.

Alternative approach

The council's 'Alternative' approach to public art is to cease requiring developer contributions for public art or to limit the circumstances under which contributions are required.

Question 83

Do you agree with the 'Preferred' approach to public art?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 84

Do you agree with the 'Alternative' approach to public art?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 85

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Main Issue 7: Climate Change and Renewable Energy (paragraphs 3.214 - 3.225)

How can future patterns of development in West Lothian increase climate resilience and contribute towards meeting Scottish Government targets for reducing greenhouse gas emissions and increasing renewable energy?

Preferred approach

The council's 'Preferred' approach for renewable energy is to retain the supportive policy framework for renewable energy developments, extending it to all low carbon energy technologies and implement the terms of supplementary guidance for wind energy developments.

Alternative approach

The council's 'Alternative' approach for renewable energy is to retain the current criteria-based wind energy policy, without the support of a spatial framework. This is not considered to provide the necessary guidance for landowners or the industry, as required by Scottish Government and would not be in accordance with current best practice, Scottish Planning Policy and guidance.

Question 86

Do you agree with the 'Preferred' approach to renewable energy?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 87

Do you agree with the 'Alternative' approach to renewable energy?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 88

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Flood risk and management (*paragraphs 3.226 – 3.229*)

Preferred approach

The council's 'Preferred' approach to flood risk is to maintain and update existing policies and supplementary guidance on flood risk, taking account of legislative requirements and emerging Scottish Government guidance, including the RBMP as appropriate.

Alternative approach

The council's 'Alternative' approach to flood risk is to go beyond requirements and identify and protect areas of land for natural flood management as this will be a consideration in the new management plans.

Question 89

Do you agree with the 'Preferred' approach to flood risk appropriate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 90

Do you agree with the 'Alternative' approach to flood risk?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 91

Do you have an alternative approach?
What is it and how would you make it work?

YES NO Don't know
Do you have any additional comments?

Air quality and noise (*paragraphs 3.230 – 3.232*)

Preferred approach

The council's 'Preferred' approach to air quality is to maintain and update existing policies on air quality, taking account of legislative requirements and any emerging Scottish Government guidance.

Alternative approach

There are no reasonable alternatives to the preferred approach.

Question 92

Do you agree with the 'Preferred' approach to air quality appropriate?
If not, why not?

YES NO Don't know
Do you have any additional comments?

Question 93

Do you have an alternative approach?
What is it and how would you make it work?

YES NO Don't know
Do you have any additional comments?

Main Issue 8: Minerals and Waste (paragraphs 3.233 – 3.246)

How can planning policy promote and ensure sustainable approaches to waste management and mineral resources in West Lothian?

Minerals (paragraphs 3.233 - 3.242)

Preferred approach

The council's 'Preferred' approach towards mineral extraction is to continue to implement the policy approach set out in the SDP and the adopted WLLP. The policy approach set out in these will however, be reviewed to take account of the guidance contained within SPP. This may be pursued through supplementary planning guidance.

Alternative approach

The council's alternative approach towards mineral extraction is to take a more liberal approach to opencast coal and hard rock extraction by widening the opencast coal "broad areas of search" and identifying the whole of West Lothian as an area of search for other minerals to be extracted, subject to environmental and residential amenity considerations and constraints, by identifying these areas and appropriate buffers beyond which the search for minerals could take place.

Question 94

Do you agree with the 'Preferred' approach to mineral extraction?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 95

Do you agree with the 'Alternative' approach to mineral extraction?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 96

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach towards waste management is to support the objectives of the Zero Waste Plan, to accommodate new provision through extensions to existing recycling facilities, or in other suitable areas and to provide a policy framework which supports the development of these facilities.

Alternative approach

The council has not identified a reasonable alternative approach to the preferred approach.

Question 97

Do you agree with the 'Preferred' approach to waste management?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 98

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Additional information

Extra page for additional information you want to give on question(s). Please state the question number text refers to.

West Lothian Local Development Plan Main Issues Report 2014

Preferred Housing Development Site EOI – 0065
Land at Bridgend Farm, Bridgend

Supporting Planning Statement

Submission on behalf of:



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October 2014

**West Lothian Local Development Plan
Main Issues Report (2014) – Response to Question 15**

**Proposed Residential Allocation on Site EOI – 0065,
Land at Bridgend Farm, Bridgend**

T & B Wilson

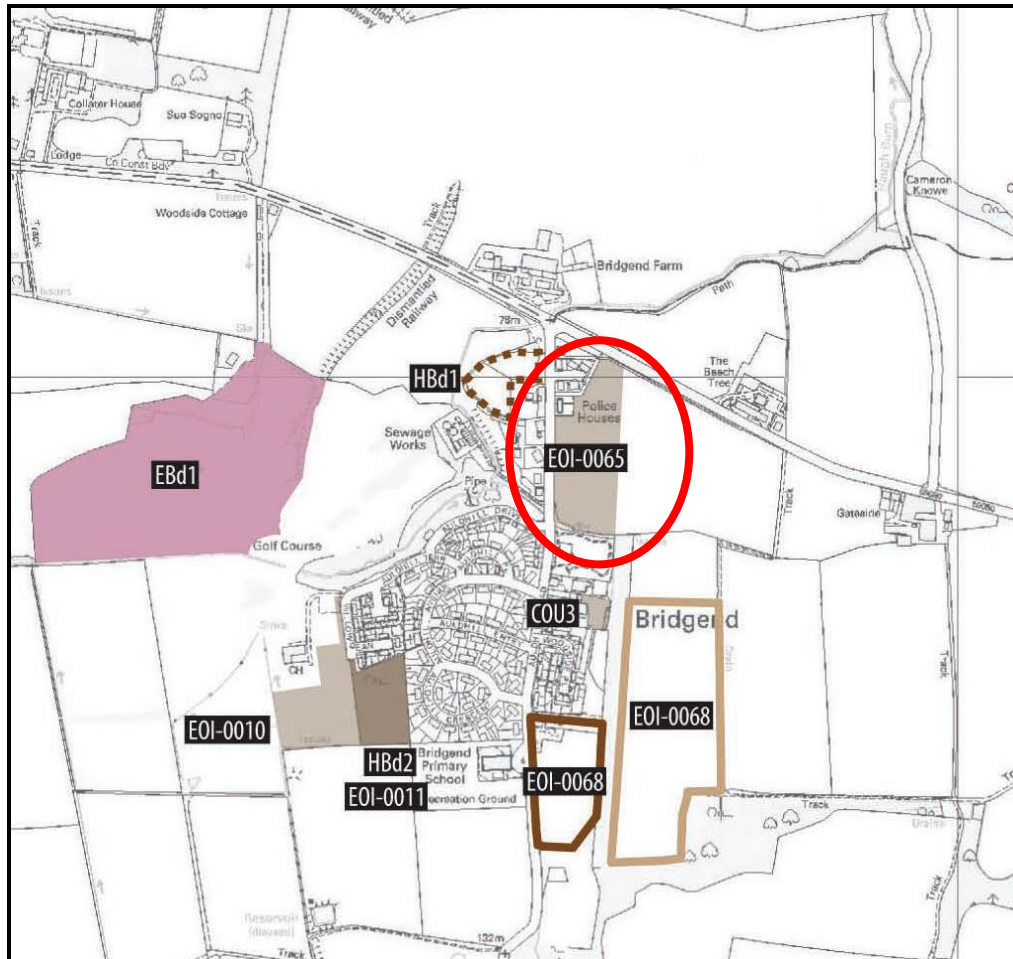
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1.0 Introduction

- 1.1 This Supporting Planning Statement has been prepared by Chartered Town Planning Consultants, John Handley Associates Ltd, on behalf of [REDACTED] in support of MIR Site EOI-0065. This Submission confirms landowner support for the 'Preferred Site' status in the Main Issues Report and sets out the opportunities for the proposed housing development site at Bridgend Farm, Bridgend.
- 1.2 The purpose of this Planning Statement is to provide West Lothian Council with an overview of the site's potential and its planning merits in the lead up to the preparation of the new West Lothian Local Development Plan (WLLDP) which is scheduled to be issued as a Proposed Plan in 2015.
- 1.3 More specifically, this Statement responds to the publication of the WLLDP Main Issues Report and the invitation to submit comments to the Council in advance of the publication of the Proposed Plan.
- 1.4 Whilst we have reviewed the full MIR, and are aware of the range of separate Consultation Questions being posed by the Council, this submission is restricted to matters relating to Main Issue 3 – Housing growth, delivery and sustainable housing locations, and Question 15 of the Main Issue Report Questionnaire.
- 1.5 Question 15 asks 'Do you agree with the 'Preferred' Strategy for housing growth in West Lothian? [REDACTED] agree with the 'Preferred' Strategy for housing growth in West Lothian insofar as it relates to Bridgend and the allocation of land for residential development at Bridgend Farm.
- 1.6 On this basis, and in specific response to Questions 15 of the Main Issues Report, this Supporting Planning Statement expands upon submissions made at the earlier call for sites stage, and supports the Council's 'Preferred' status and the proposed allocation of the site at Bridgend Farm for residential development in the emerging Local Development Plan.

2.0 Main Issues Report

- 2.1 The site is identified in the MIR as *Site EOI-0065 – Bridgend Farm*. The site is shown in the extracts from the proposals map below:



WLLDP MIR Proposals Map extract with site highlighted

- 2.2 The allocation of the site at Bridgend Farm is fully supported by the landowner and can contribute to West Lothian Council’s aims and objectives for the village. The site can also make a small but effective contribution to the West Lothian housing land supply.
- 2.3 The Bridgend Settlement Statement within the MIR considers issues within Bridgend; infrastructure considerations; spatial strategy considerations; and priorities for Bridgend.

2.4 An extract from the Bridgend Settlement Statement is detailed below:

| |
|---|
| Issues |
| Tackle areas of social deprivation; improve the housing mix. |
| Infrastructure considerations |
| The village is served by Bridgend Primary School and St Joseph’s Primary, Linlithgow. It has no secondary school but is within the school catchment areas of Linlithgow Academy and St Kentigern’s High School, Blackburn. A new secondary school is proposed at Winchburgh as part of the Winchburgh Core Development Area. This will result in changes to school catchment areas. |
| Spatial strategy considerations |
| The availability of infrastructure, strategic location, and existing facilities makes the town an attractive option for future development. |
| Priorities |
| Review open space provision; promote path links to the wider path network and surrounding countryside; improve the housing mix; review settlement envelope |

2.5 The allocation and development of the Bridgend Farm site for new housing would help provide a different housing mix through the allocation of sites for private sector investment and assist in achieving a more balanced community. In doing so, this would help to contribute towards the Council's emerging Regeneration Strategy which seeks to address a number of key outcomes of reducing inequality, improving health and well-being, increasing employment opportunities, improving education and skills and carrying out environmental improvements.

3.0 Planning Policy Context

National Planning Framework 3 (NPF3)

- 3.1 The third National Planning Framework (NPF3) provides the statutory framework for Scotland’s long-term spatial development. It sets out the Scottish Government’s spatial development priorities for the next 20 to 30 years. Planning authorities are required to take the Framework into account when preparing development plans and it is a material consideration in the determination of planning applications.
- 3.2 NPF3 confirms that the Scottish Government’s central purpose is to create a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth. To achieve this, the Government Economic Strategy aims to share the benefits of growth by encouraging economic activity and investment across all of Scotland’s communities, whilst protecting our natural and cultural assets.
- 3.3 In terms of the vision for Scotland, NPF3 confirms that this includes a vision where Scotland is a successful, sustainable place with a growing economy which provides opportunities that are more fairly distributed between, and within, all communities. The objective is to provide high quality, vibrant and sustainable places with enough, good quality homes. Our living environments foster better health and we have reduced spatial inequalities in well-being. There is a fair distribution of opportunities in cities, towns and rural areas, reflecting the diversity and strengths of our unique people and places.
- 3.4 Section 2 of NPF3 sets out the Government’s strategy to achieve the vision of “a *successful, sustainable place*”. The strategy is to ensure that all parts of Scotland make best use of their assets to build a sustainable future, and to create high quality, diverse and sustainable places that promote well-being and attract investment. NPF3 notes that the financial climate has reduced the amount of new housing built in recent years, but the Scottish Government is committed to a significant increase in house building to ensure housing requirements are met across the country.
- 3.5 NPF3 encourages high quality, diverse and sustainable developments that promote well-being and attract investment. It confirms that there is a need for a significant increase in house building to ensure housing requirements are met across the country and more ambitious and imaginative planning is needed to ensure a generous and effective supply of housing land.

- 3.6 The site at Bridgend Farm is preferred for residential development in the WLLDP MIR, and the allocation of the site in the emerging Local Development Plan would accord with the aims of NPF3 through the provision of new housing land in an accessible and sustainable location.

Scottish Planning Policy

- 3.7 The updated Scottish Planning Policy (SPP) was published alongside the new NPF in June 2014 and sets out the policy that will help to deliver the objectives of NPF3. The SPP is a statement of Scottish Government policy on how nationally important land use planning matters should be addressed across the country.
- 3.8 It is a material consideration that carries significant weight in the preparation of development plans and the determination of planning applications and appeals.
- 3.9 The new SPP confirms that the Scottish Government's central purpose is to focus on creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth. Sustainable economic growth is defined as: "Building a dynamic and growing economy that will provide prosperity and opportunities for all, while ensuring that future generations can enjoy a better quality of life too".
- 3.10 Paragraph 15 explains that by locating the right development in the right place, planning can provide opportunities for people to make sustainable choices and improve their quality of life. Well-planned places promote well-being, a sense of identity and pride, and greater opportunities for social interaction. Delivering high-quality buildings, infrastructure and spaces in the right locations helps provide choice over where to live and style of home, choice as to how to access amenities and services and choice to live more active, engaged, independent and healthy lifestyles.
- 3.11 The new SPP confirms the introduction of a presumption in favour of development that contributes to sustainable development. SPP explains that the planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term.

- 3.12 SPP explains that policies and decisions should be guided by a number of principles, including:
- giving due weight to net economic benefit;
 - responding to economic issues, challenges and opportunities, as outlined in local economic strategies;
 - supporting good design and the six qualities of successful places;
 - making efficient use of existing capacities of land, buildings and infrastructure including supporting town centre and regeneration priorities;
 - supporting delivery of accessible housing, business, retailing and leisure development;
- 3.13 In relation to housing development SPP sets out the Government's approach towards "Enabling Delivery of New Homes" and confirms the need to facilitate new housing development, particularly in areas within our cities network where there is continuing pressure for growth. SPP also confirms that house building makes an important contribution to the economy, and planning can help to address the challenges facing the housing sector by providing a positive and flexible approach to development.
- 3.14 SPP confirms that the planning system should: identify a generous supply of land; maintain at least a 5-year supply of effective housing land at all times; and enable provision of a range of attractive, well-designed, energy efficient, good quality housing, contributing to the creation of successful and sustainable places. In addition SPP confirms the local development plans should indicate the number of new homes to be built over the plan period, and this figure should be increased by a margin of 10% to 20% in order to ensure that a generous supply of land for housing is provided. Local development plans should provide for a minimum of 5 years effective land supply at all times.
- 3.15 SPP explains that planning authorities and developers should work together to ensure a continuing supply of effective land and to deliver housing, taking a flexible and realistic approach.
- 3.16 The proposals put forward for the Bridgend Farm site would provide an element of residential development to meet West Lothian's housing requirement and will contribute to the Council's priority of improving housing mix in Bridgend. The allocation of the site at Bridgend Farm is therefore consistent with the Scottish Government Guidance provided through NPF3 and SPP.

SESplan Strategic Development Plan

- 3.17 The South East Scotland Strategic Development Plan (SESplan) was approved by Scottish Ministers in June 2013. The Strategic Development Plan states that South East Scotland is the main growth area and the key driver of the Scottish economy.
- 3.18 SESplan has a clear aim of promoting sustainable development, whilst creating opportunities for satisfying the full range of housing needs. The Vision set out in SESplan includes the aims to:
- Set out a strategy to enable delivery of housing requirements to support growth and meet housing need and demand in the most sustainable locations.
 - Integrate land use and sustainable modes of transport, reduce the need to travel and cut carbon emissions by steering new development to the most sustainable locations.
 - Conserve and enhance the natural and built environment.
- 3.19 In terms of spatial strategy, the SESplan identifies 13 strategic development areas (“SDAs”). Bridgend falls within the West Lothian SDA. The SESplan confirms that within this SDA there is a need for a significant level of new homes. The SESplan confirms that such allocations will be focused in sustainable locations where infrastructure is either available or can be provided and in locations where there are no environmental constraints. The allocation of the Bridgend Farm site therefore accords with the spatial strategy of SESplan.
- 3.20 SESplan also confirms the need for a generous supply of housing land to be available at all times. The allocation of land for residential development at Bridgend Farm would help to contribute to the housing land supply in West Lothian.
- 3.21 SESplan Policy 6 requires that:

“Each planning authority in the SESplan area shall maintain a five years’ effective housing land supply at all times. The scale of this supply shall derive from the housing requirements for each Local Development Plan area identified through the supplementary guidance provided for by Policy 5. For this purpose planning authorities may grant planning permission for the earlier development of sites which are allocated or phased for a later period in the Local Development Plan.”

3.22 Sites such as Bridgend Farm can make an effective contribution to the five year housing land supply in West Lothian. The nature of the site makes it deliverable within the short term as it is small scale in nature, and capable of early delivery.

3.23 SESplan Policy 7 also confirms that:

“Sites for greenfield housing development proposals either within or outwith the identified Strategic Development Areas may be allocated in Local Development Plans....., subject to satisfying each of the following criteria:

- a. The development will be in keeping with the character of the settlement and local area;*
- b. The development will not undermine green belt objectives; and*
- c. Any additional infrastructure required as a result of the development is either committed or to be funded by the developer”.*

3.24 The Bridgend Farm site meets all of these criteria in that the small scale of development would be in keeping with the character of the settlement and local area; the site is not within the green belt; and (as confirmed in the MIR) there is available infrastructure capacity in Bridgend to accommodate the proposed development of c. 30 units. The allocation of this site in the new LDP would therefore accord with Policy 7 of the SESplan.

4.0 Site & Surrounding Area

- 4.1 The village of Bridgend is located in the north west of West Lothian, on the south side of the Linlithgow/ Winchburgh Road (B9080), some 3.5km to the east of Linlithgow.
- 4.2 The site at Bridgend Farm is located to the north east of Bridgend and is accessed off Auldhill Road which is a minor road which runs north/south through Bridgend and forms a junction with the B9080 at the north end of the village.



Aerial Photograph showing location of site and relationship to existing settlement

- 4.3 The site extends to 2.7ha and is preferred for residential development in the MIR to accommodate 30 units.

- 4.4 The site is an elongated site located on the east and south sides of a small cul-de-sac of existing residential development at Auldhill Court, adjacent to the south east side of the junction of the B9080 with Auldhill Road. The northern boundary forms a short frontage onto the B9080 and its longer western boundary forms a frontage onto part of Auldhill Road.



Aerial Photograph showing location of site and relationship to existing housing

4.5 The site comprises the western part of a large, arable field which rises to a shallow crest in the middle and is bounded on its distant eastern edge by a fence and hedge row. To the north on the opposite site of the B9080, and to the east of the larger site are agricultural fields. To the south, a hedge and fencing separate the site from an area of public open space, including an equipped play area. To the west, fronting the opposite side of Auldhill Road, are detached houses.

4.6 Photographs of the site and its surroundings are set out below



View of site looking north east from Auldhill Road



View of site looking south east from Auldhill Road

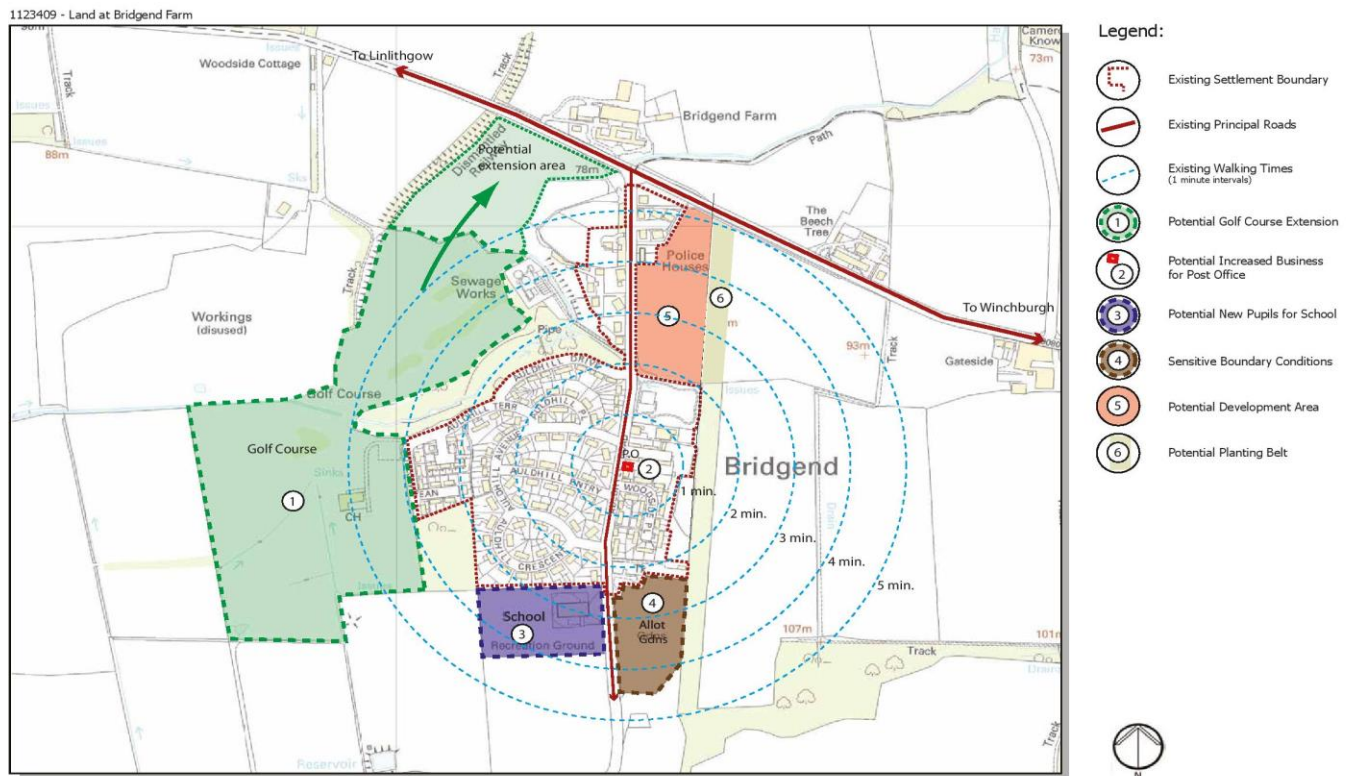


View of site looking north from junction of Auldhill Drive and Auldhill Road

5.0 Proposed Development of Site

5.1 As confirmed in the MIR, the site can accommodate approximately 30 units. As the Local Development Plan emerges and a future planning application is progressed, a masterplan will be prepared for the site. It is anticipated that residential development at Bridgend Farm would be compatible with the immediately adjacent uses and will be of a scale, density and character in keeping with the local area.

5.2 In addition to this small scale housing expansion of the village, the landowner is keen to support the wider community benefits that may arise from the residential development at Bridgend Farm. Opportunities for these benefits are shown on the Community Benefits Plan below.



Community Benefits - Land at Bridgend, West Lothian



- 5.3 A future masterplan will be prepared to reflect best practice in the planning and design of new housing development. This is a holistic approach that integrates urban design, land use, housing, transportation, ecology, landscape, conservation and energy efficiency.
- 5.4 Development at Bridgend Farm will provide a high quality, sustainable development which is planned, phased and developed in a coordinated and integrated manner. The future masterplan will demonstrate how the site will maximise opportunities to integrate the new development with the existing settlement and set out a landscape and framework which will enhance the setting of Bridgend at this location.
- 5.5 MIR Appendix 3 sets out preferred housing sites and proposed phasing. This indicates that 10 units could be delivered in the period 2014 to 2019 and the remaining 20 delivered between 2019 and 2024. The landowner however is keen to bring the site forward in order that the village can benefit from the development, a more optimistic rate of development is therefore anticipated.
- 5.6 The following section sets out the effectiveness of the site in relation to PAN 2/2010 and demonstrates that the site can be delivered within a short term timescale.

6.0 Site Effectiveness

6.1 The tests of effectiveness for housing allocations are set out in paragraph 55 of Planning Advice Note 2/2010 – Affordable Housing and Housing Land Audits. These are as follows:

- ownership: the site is in the ownership or control of a party which can be expected to develop it or to release it for development. Where a site is in the ownership of a local authority or other public body, it should be included only where it is part of a programme of land disposal;
- physical: the site, or relevant part of it, is free from constraints related to slope, aspect, flood risk, ground stability or vehicular access which would preclude its development. Where there is a solid commitment to removing the constraints in time to allow development in the period under consideration, or the market is strong enough to fund the remedial work required, the site should be included in the effective land supply;
- contamination: previous use has not resulted in contamination of the site or, if it has, commitments have been made which would allow it to be developed to provide marketable housing;
- deficit funding: any public funding required to make residential development economically viable is committed by the public bodies concerned;
- marketability: the site, or a relevant part of it, can be developed in the period under consideration;
- infrastructure: the site is either free of infrastructure constraints, or any required infrastructure can be provided realistically by the developer or another party to allow development; and
- land use: housing is the sole preferred use of the land in planning terms, or if housing is one of a range of possible uses other factors such as ownership and marketability point to housing being a realistic option.

6.2 It is noted that paragraph 55 of the PAN specifically states that: *“To assess a site or a portion of a site as being effective, it must be demonstrated that within the five-year period beyond the date of the audit the site can be developed for housing (i.e. residential units can be completed and available for occupation), and will be free of constraints”*.

- 6.3 Addressing the requirements of the PAN in turn the following is confirmed: the site is owned by T&B Wilson, the owners of Bridgend Farm and the majority of the land surrounding the village of Bridgend. T&B Wilson are landowners, farmers and property developers and have considerable experience of releasing land for development, particularly housing development throughout central Scotland. Whilst there is at this stage no preferred house builder, we can confirm that there has been significant interest from housing developers and the site will be released for development once allocated.
- 6.4 There are no known slope, aspect, flood risk, ground stability or vehicular access constraints which would preclude the site's successful and viable development. The site enjoys a generally south facing slope which aids passive solar gain and has a pleasant aspect in terms of adjacent land uses. Both the SEPA and WLC Flood Risk Assessment consultation responses on the Call for Sites exercise request a Flood Risk Assessment for the site. The FRA should assess the flood risk from the small watercourse which flows along the southern boundary, consideration should also be given to any culverted watercourses within/nearby the site. It is anticipated that any issues arising from FRA assessment can be mitigated. There are no ground stability issues and the site can be accessed directly off the Auldhill Road.
- 6.5 The proposal is a small-scale housing development which, unlike some of recent large scale housing releases, has no significant infrastructure requirements. The existing primary school has significant spare capacity and would benefit from more housing development, and the previous capacity constraints at Linlithgow Academy are being addressed. The site is an effective, viable, available and unconstrained site which can provide an element of the housing land requirements in the local development plan period.
- 6.6 Given the agricultural use of the site, there are no known contamination issues.
- 6.7 The site would not require any financing to make the development economically viable.
- 6.8 The site is located within a popular housing market area where there have been very few new housing opportunities in recent years. Despite current market conditions, there is demand for new housing in this area of the type and scale being proposed on this site. From the experience of the landowners' Property Advisers, the site can be successfully marketed within the plan period, and there has been a significant level of interest in the site from housing developers.

- 6.9 The site would be sold to a house builder to develop.
- 6.10 In this location, and given current market requirements, it is anticipated the build rate will be 10 -15 units per annum, taking 2-3 years to complete the site. This is a more optimistic build rate than set out in MIR appendix 3 but reflects the landowners desire to see development delivered at Bridgend.
- 6.11 Subject to the granting of the necessary planning and construction consents, it is anticipated that development could commence on site in 2016. However, the landowner is keen to progress an earlier development and would be prepared to submit an application for planning permission in principle in advance of LDP adoption should this be supported by the Council.

7.0 Recent Planning History

- 7.0 This site at Bridgend Farm was first promoted for residential development through the previous Local Plan. At that time it was concluded by the Council that allocation of the site was not required for development due to other strategic land releases in the area, and notably the Winchburgh CDA.
- 7.1 The site was, however, submitted as a candidate site during the West Lothian Local Development Plan 'Call For Sites' exercise in May 2011.
- 7.2 The call for sites submission suggested that: *"a residential allocation on the Bridgend Farm site will help to increase local housing choice and would in turn help sustain existing services and business within the village. This includes the local primary school which is a valued focus for the community, but like other small rural schools has a falling school roll as a result of limited new housing development in the village over recent years. The housing site is a small scale development which has no significant infrastructure requirements. It is an effective, viable, available and unconstrained site."*
- 7.3 The site has therefore been assessed in detail by West Lothian Council in response to the Call for Sites exercise and has been also been subject to Strategic Environmental Assessment. As a result of these assessments, West Lothian Council have now supported the allocation of this site for residential development in the emerging Local Development Plan with the 'Preferred Site' status in the Main Issues Report.

8.0 West Lothian Council Site Assessment

Response to Call for Sites Exercise

8.1 The Council’s conclusions in response to the call for sites exercise state:

“Development of the site contributes towards the council's emerging Regeneration Strategy which seeks to address a number of key outcomes of reducing inequality, improving health and well-being, increasing employment opportunities, improving education and skills and carrying out environmental improvements. This is particularly applicable to communities located in the west of West Lothian by providing a different housing mix through allocating sites for private sector investment and assist in achieving more balanced communities.”

8.2 Consultation responses have been received by West Lothian Council in response to the Call for Sites submission. The issues raised during the consultation process are detailed and addressed below.

| Consultee | Issues Raised | Landowner Response |
|----------------------------------|---|--|
| British Airports Authority (BAA) | <p>The site falls within the safeguarding consultation zone (which is 13km from an aerodrome, in this case Edinburgh Airport) under Circular 2/2003 'Safeguarding of Aerodromes, Technical Sites and Military Explosives Storage Areas' and also falls within the Edinburgh Airport Lden noise contours as specified by The Environmental Noise Directive (2002/49) and supplemented in Scotland by the Environmental Noise (Scotland) Regulations 2006, relating to aircraft noise. Any proposal/application therefore will require to be subject of consultation with BAA aerodrome safeguarding.</p> <p>Any development is likely to be restricted to 15m in height and will contain flat roofs only and above ground SUDs systems should be avoided in order to minimise the potential of bird strike and landscaping will require careful design. Birds are mobile and whilst every effort can be taken on an aerodrome to address potential bird hazards, aerodrome safeguarding, through local authority planning permissions, is one of the key methods for addressing existing and potential hazards off-airport. To reduce the risk of bird strikes, specific requirements associated with landscaping schemes within 13km of Edinburgh Airport should be factored into development proposals from the outset. Addressing the constraint from the outset will also ensure the council as planning authority do not require amended landscaping schemes whilst processing any application and will not require amended plans post the granting of planning permission.</p> | BAA would be a statutory consultee during the planning application process |
| Coal Authority | Coal resources are present within West Lothian, and the area has been subjected to coal mining which will have left a legacy. In terms of the site assessments and any eventual site allocations, it would be prudent to include a criterion which assessed coal mining data. This would be a due diligence check to ensure that potential | Coal mining data would be assessed as part of a package of technical reports submitted with a planning application |

| | | |
|-----------------------------------|--|--|
| | <p>development sites do not contain any mine entries or other coal related hazards which would require remediation or stabilisation prior to development.</p> <p>Former mining activities and related hazards are not a strict constraint on development. The Coal Authority would not wish to suggest that any potential sites should be excluded from the assessment on the grounds of former mining legacy issues.</p> <p>In addition, an assessment should be made of the likely impact on mineral resources, including coal. This will help to ensure that any potential sterilisation effects (along with whether prior extraction of the resource would be appropriate) are properly considered in line with the guidance in Scottish Planning Policy</p> | |
| Historic Scotland | No specific comments. | |
| HSE (Health and Safety Executive) | No specific comments. | |
| NHS - Lothian | <p>Bridgend feeds into the Linlithgow catchments where the existing facility is Linlithgow Health Centre The existing health centre in Linlithgow is in poor condition and has no scope to be physically extended. If there was to be more demand/larger population, a new facility would have to be developed but it is unclear whether the existing GP practices would want to expand even if a new facility is built. The NHS has been tentatively approached by the Burghmuir applicant in order that a site for a new health centre could be provided on their site.</p> <p>All GP Practices have their own 'catchment areas' and GPs work independently to the NHS with there being a mixture of ownership and tenures regarding building usage and stock. The focus in recent years has been a move towards shared services and the development of Partnership Centres. Further dialogue with the NHS will be required once new allocations have been identified.</p> | It is not anticipated that the scale of development will impact greatly on the NHS services provided in the area, but this can be assessed in further detail should this be required. |
| Scottish Enterprise | No specific issues or concerns. | |
| Scottish Water | <p>In terms of water supply the site is served by the BALMORE water treatment works (WTW) where there is sufficient capacity.</p> <p>In terms of waste water treatment the site is served by the BRIDGEND waste water treatment works (WWTW) where there is sufficient capacity.</p> | Scottish Water would be further consulted during the planning application process. |
| SEPA - Flooding | SEPA recommend that a Flood Risk Assessment is submitted for this site which assesses the flood risk from the small watercourse which flows along the southern boundary. Consideration should also be given to any culverted watercourses within/nearby the site. There is also the potential that this site could lead to increased flood risk potential out with this site. | A flood Risk Assessment would be carried out as part of a package of supporting documents for a planning application. It is anticipated that any flood risk could be mitigated given the small scale nature of the site. |
| SEPA – Water Environment | There is no water body of any significance close to this site. A buffer strip of 6m would however be required from development to the watercourse at the southern end of the site. No WFD pressure however straightened burn could be enhanced. There could be a restoration opportunity to enhance the straightened burn. | Appropriate landscaping of the southern watercourse would be included in a detailed masterplan for the site |
| SNH | No records. Potential green network link to existing woodland to south of the site. | Potential green network link can be explored as part of a detailed masterplan |
| Transport Scotland | The majority of strategic transport network impacts will result from cumulative, rather than individual, impacts of development. A cumulative appraisal of sites impacting on the strategic transport network i.e. trunk roads and rail networks will need to be undertaken once there is certainty on what sites are preferred to come forward. | Due to the small scale nature of the development it is not anticipated that there will be an impact on the strategic road network. |

| | | |
|-------------------------------------|--|--|
| WLC – Contaminated Land | No known issues. However, developers should satisfy themselves that all matters relating to ground conditions have been assessed. | Ground conditions would be investigated as part of technical reports associated with a planning application. |
| WLC – Economic Property Development | No comments. | |
| WLC - Education | No Education support - capacity issues at St Josephs RC Primary School, Linlithgow, the catchment RC Primary school but there is capacity at Bridgend Primary School. | It is anticipated that at the time of a planning application, any education issues will have been resolved by WLC |
| WLC – Environmental Health | No issues | |
| WLC – Flood Risk Assessment | Would require a Flood Risk Assessment which assesses the flood risk from the small watercourse which flows along the southern boundary. Consideration should also be given to any culverted watercourses within/nearby the site. Flood Risk Assessment is submitted for this site which assesses the flood risk from the small watercourse which flows along the southern boundary. Consideration should also be given to any culverted watercourses within/nearby the site. There is also the potential that this site could lead to increased flood risk potential out with this site. | A flood Risk Assessment would be carried out as part of a package of supporting documents for a planning application. It is anticipated that any flood risk could be mitigated given the small scale nature of the site. |
| WLC – NETS and Land Services | No Comments | |
| WLC - Transportation | Access off Auldhill Road. See also Transportation Background Paper to the Main Issues Report (MIR) for further details. | Access suggestion will be investigated as part of detailed masterplan at planning application stage. The Transportation background paper confirms that any impact would be local and would not be enough to show on a transport model. |
| WLC – Waste Management | Generic Response - The only comment that Waste would wish to make at this stage is that the proposed 13,000 properties noted could in time merit a minimum of four additional vehicles for Waste Services. This is assuming the current collection regime remains as is (no shift changes) and accounts for food waste and glass taking off as well. Some detailed consideration would also need to be undertaken on recycling points and /or the potential for additional pressure on the amount of Community Recycling Centre sites we might operate at that time. | |
| WOSAS | No sites have been recorded from within this area. The site was depicted as being undeveloped ground on the 1st, 2nd and 3rd edition OS maps, suggesting that it may retain some potential to produce buried deposits associated with previous phases of occupation. | Archaeology would be investigated as part of technical reports at the planning application stage. |

8.3 As the landowner responses demonstrate, the issues raised in the consultation responses can be fully addressed as the site progresses through the local development plan process and any specific and technical requirements will be dealt with when a planning application comes forward for the development of the site.

Strategic Environmental Assessment

8.4 The site has also been the subject of Strategic Environmental Assessment; the SEA does not raise any issues of significance in relation to the proposed residential development of the site. The SEA Call for Sites-site appraisal raises similar issues as are detailed in the above consultation responses. The SEA Site appraisal additionally states that “there are a number of existing trees along the northern and southern boundaries but none of any significance within the main body of the site. Management and retention will require to be discussed with the council’s arboricultural officer.” The retention and management of trees on site is something that will be considered during the masterplan and planning application process.

8.5 In relation to education the SEA appraisal states that there may be capacity issues at Linlithgow Academy. The Main Issues Report Settlement Statement for Bridgend confirms the following as the position on education: *“The village is served by Bridgend Primary School and St Joseph’s Primary, Linlithgow. It has no secondary school but is within the school catchment areas of Linlithgow Academy and St Kentigern’s High School, Blackburn. A new secondary school is proposed at Winchburgh as part of the Winchburgh Core Development Area. This will result in changes to school catchment areas.”* It is anticipated that when a planning application comes forward on the site, education capacity issues will have been resolved by West Lothian Council.

8.6 An extract from the SEA - Assessment of proposed development sites is included below:

| Does the Proposal / Allocation.... | | | | | | | | | | |
|--|---|--------------|------------------|-------------------|-----------------------|-----------------|---------------------|------|-------|---------|
| SEA Topic | Air | Biodiversity | Climatic Factors | Cultural Heritage | Landscape & Townscape | Material Assets | Population & Health | Soil | Water | Comment |
| | Avoid AQMA areas/ avoid exacerbating air quality of AQMA/ avoid areas which could become AQMA? Have good proximity to jobs/ services (enabling access within walking distance)? Have good access to existing or proposed public transport? Avoid adverse effect on integrity of designated international nature conservation sites? Avoid causing significant effect on designated national/ regional/ local biodiversity sites & ancient woodland/ biodiversity sites? Avoid adverse direct impact on species/habitats or on contribution to the emerging green network? Occupy a relatively efficient location in terms of energy consumption Occupy a location at risk of increased flooding or instability due to climate change? Avoid adverse (or create positive) effects on listed buildings and/ or its setting? Avoid adverse (or create positive) impact on scheduled monuments and for its setting? Avoid adverse (or create positive) impact on local historical/archaeological sites? Avoid adverse (or create positive) effects on a Conservation & Designated Landscape? Avoid adverse effects (or create positive) on the historic environment including the architectural, historic or townscape interest, or Avoid AQMA/ Areas of Special Landscape Control/ Areas of Special Control Avoid conspicuous locations that require extensive landscape treatment/ structural Avoid loss of adverse effects on public open space/ improve open space provision (quantity/ quality)? Avoid loss of land important to avoidance of coalescence/ preservation of settlement identity? Safeguard mineral resources from sterilisation within Areas of Search? Minimise use of ‘Greenfield’ land? Avoid co-location of sensitive development with industrial facilities/ economic allocations? Avoid loss of prime quality agricultural land and peatland? Maintain status of baseline water bodies? Minimise flood risk (on site or elsewhere)? | | | | | | | | | |
| Assessment | √, /, ?, X | | | | | | | | | |
| EOI: Ref/Site (Column 1: Green = Preferred site / Blue = Alternative site / Red = Not Preferred site; arising from the following assessment of 9 SEA topics) | | | | | | | | | | |
| 65: Bridgend Farm (NE site) | √ | √ | √ | √ | √ | √ | √ | √ | X | ? |

- 8.7 As can be seen from the above, the SEA highlights that there will be a requirement for Flood Risk Assessment on the site. As stated previously, a Flood Risk Assessment would be carried out as part of any technical supporting studies required as part of a planning application. It is anticipated that any flood risk could be mitigated given the small scale nature of the site.
- 8.8 The other negative issues raised through the SEA are 'the use of greenfield land' and the 'loss of prime agricultural land'. The Council have confirmed, through the Main Issues Report, that the issues that require to be addressed in Bridgend are social deprivation and an improved housing mix. There is a shortage of brownfield land in settlements such as Bridgend, the only way to deliver the community benefits associated with new residential development is to build on greenfield land and this inevitable results in the loss of agricultural land. It is considered that the 2.7ha site a Bridgend Farm is not a significant loss in relation to the remaining agricultural and greenfield land in the area.

9.0 Summary of Benefits and Advantages of Site

- 9.1 Development of the site at Bridgend Farm will enable West Lothian Council to comply with the policy requirements of SESplan and the updated SPP including the Government's specific objective to provide a generous supply of housing land. There is a need to maintain an effective 5 year housing land supply at all times, the site at Bridgend Farm is an effective and deliverable site and can contribute 30 units in the short term to the housing land supply.
- 9.2 The residential site is an accessible, logical and natural extension to the village and would expand the existing settlement in a sustainable, viable and effective manner.
- 9.3 As confirmed by the West Lothian Council site assessments, the site can be developed without any apparent physical or environmental constraints. In particular, the proposed residential development of this site could be contained comfortably into the landscape, permitting small but high quality development in terms of design, layout and landscaping.
- 9.4 The development site is not within the green belt and is not subject to any specific countryside or landscape designation or protection.
- 9.5 New residential development at this location would not only provide a desirable location to live but would also represent a sustainable approach to development, which takes advantage of existing infrastructure capacity.
- 9.6 The site is well located, taking access directly from the Auldhill Road and benefits from an accessible location close to existing bus stops and major transport corridors/nodes (M9 and B9080)
- 9.7 While there are limited services in the village, new housing would help sustain the local community by providing additional variety and choice of housing for potential house buyers in West Lothian; potentially increasing trade for local businesses; providing new pupils for the local school and helping to ensure its long term future.

10.0 Conclusion

- 10.1 The site at Bridgend Farm is preferred for residential development in the West Lothian Local Development Plan Main Issues Report, and the allocation of the site in the emerging Local Development Plan would meet the aims and objectives set out in the settlement statement for Bridgend.
- 10.2 The allocation of the site is fully supported by the landowner, T & B Wilson, and is considered to be effective and deliverable within the short term and will make an effective contribution to the West Lothian Housing Land supply.
- 10.3 We trust this additional information in support of this site will be of assistance to West Lothian Council as part of the preparation of the Proposed Local Development Plan, and would respectfully request that this site is allocated for housing development in the Proposed Local Development Plan when it is issued for further public consultation next year.

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INTRODUCTION

ReachCSG <http://www.reachcsg.co.uk/> hold PEDL license 162, which covers 400km² of the Central Belt. This license is mostly in North Lanarkshire, but it does include approximately 9 km² in West Lothian near Blackridge.

A recent study by the British Geological Survey (BGS) in Edinburgh on behalf of the Department of Energy & Climate Change (DECC) identified West Lothian as prospective for drilling for shale gas and shale oil. DECC has recently commenced the 14th Onshore Licensing Round for licensing areas within West Lothian and elsewhere in the Central Belt.

ReachCSG are, therefore, an interested party in terms of how West Lothian Council reflect upon the onshore oil and gas industry in the forthcoming West Lothian Local Development Plan Proposed Plan.

In brief, ReachCSG request that the Council draft the Proposed Plan in such a way as to be consistent with Scottish Planning Policy (SPP), which is generally supportive of the onshore oil and gas industry, subject to appropriate environmental and amenity standards being met.

14TH LICENSING ROUND

Licensing for exploration of onshore oil and gas is the responsible of DECC. A licence confers exclusivity in a defined area, as against other exploration companies, but does not exempt the company from other legal/regulatory requirements and consents before any drilling can take place.

The current 14th Onshore Licensing Round requires applications to be submitted by the end of October 2014 and the DECC website <https://www.gov.uk/oil-and-gas-licensing-rounds> includes a wealth of information on the licensing process and includes hyperlinks to other bodies that have a role in the regulation of the industry, which in Scotland are DECC, the local planning authority (and the Scottish Government), SEPA, Health and Safety Executive, the Coal Authority and other statutory consultees.

SCOTTISH GOVERNMENT ENERGY POLICY AND SCOTTISH PLANNING POLICY (SPP)

The Scottish Government's policy on electricity generation is set out in the Electricity Generation Policy Statement (2013), which states that Scotland's generation mix should deliver:

- "a secure source of electricity supply;
- at an affordable cost to consumers;
- which can be largely decarbonised by 2030;
- and which achieves the greatest possible economic benefit and competitive advantage for Scotland including opportunities for community ownership and community benefits."

Continued thermal generation, including from gas, remains an important element of this balanced approach, and need for energy supply security, and the Policy Statement makes clear that this will continue to be the case going forward, subject always to continued attempts to reduce carbon emissions and protecting the environment and local communities from unacceptable harm.

SPP supports the wider Scottish Government energy policy by requiring the planning system to support Scotland's move towards being a low carbon economy, but as part of a balanced approach to this understands that electricity and heat from non-renewable sources, such as oil and gas, will remain important, particularly "where greenhouse gas emissions can be significantly reduced" (paragraph 154).

More detailed guidance relating to onshore oil and gas can thereafter be found in SPP in relation to 'Promoting Responsible Extraction of Resources', which states that the planning system should (paragraph 235)

- "recognise the national benefit of indigenous coal, oil and gas production in maintaining a diverse energy mix and improving energy security;
- safeguard workable resources and ensure that an adequate and steady supply is available to meet the needs of the construction, energy and other sectors;
- minimise the impacts of extraction on local communities, the environment and the built and natural heritage; and
- secure the sustainable restoration of sites to beneficial afteruse after working has ceased."

Development management specific policy can be found in paragraphs 245 and 246 of SPP, which state as follows.

"245. To assist planning authorities with their consideration of impacts on local communities, neighbouring uses and the environment, applicants should undertake a risk assessment for all proposals for shale gas and coal bed methane extraction. The assessment can, where appropriate, be undertaken as part of any environmental impact assessment and should also be developed in consultation with statutory consultees and local communities so that it informs the design of the proposal. The assessment should clearly identify those onsite activities (i.e. emission of pollutants, the creation and disposal of waste) that pose a potential risk using a source–pathway–receptor model and explain how measures, including those under environmental and other legislation, will be used to monitor, manage and mitigate any identified risks to health, amenity and the environment. The evidence from, and outcome of, the assessment should lead to buffer zones being proposed in the application which will protect all sensitive receptors from unacceptable risks. When considering applications, planning authorities and statutory consultees must assess the distances proposed by the applicant. Where proposed distances are considered inadequate the Scottish Government expects planning permission to be refused.

246. Conditions should be drafted in a way which ensures that hydraulic fracturing does not take place where permission for such operations is not sought and that any subsequent application to do so is subject to appropriate consultation. If such operations are subsequently proposed, they should, as a matter of planning policy, be regarded as a substantial change in the description of the development for which planning permission is sought or a material variation to the existing planning permission. Where PEDL and Underground Coal licences are granted for the same or overlapping areas, consideration should be given to the most efficient sequencing of extraction."

More recently, Scotland has seen the publication of the Scottish Government's Independent Expert Scientific Panel 'Report on Unconventional Oil and Gas', which provides an overview of the industry and comments on areas where the Scottish Government could look to strengthen regulation and guidance, although it concludes that the existing consenting regime is generally appropriate, fit for purpose and robust. This document is particularly useful in that it includes a history of oil and gas exploration in the Central Belt, including West Lothian, and also summaries the current consenting and regulatory regime that applies to the industry.

The Minister for Energy, Enterprise and Tourism, Fergus Ewing, welcomed the Panel report, when it was published in July 2014, and went to state that "it is clear from the report that there could be potential for an unconventional hydrocarbon industry in Scotland", but accepted that there were nonetheless certain challenges in the regulatory regime, which would be need to be looked at

further, particularly in terms of possible impacts on health. He went on to say that the intention now is to set up a Working Group to consider the findings of the Panel's report in more detail and to ensure regulation of the industry is completely robust and fully takes on board the views of the local community. See the full news release at <http://news.scotland.gov.uk/News/Scottish-Government-Welcomes-Independent-Report-into-Unconventional-Oil-Gas-f28.aspx> and where a hyperlink to the full report is also available.

The need for community engagement has already been recognised by the industry, through its trade body UKOOG (United Kingdom Onshore Oil and Gas), and the publication of its Community Engagement Charter will ensure that local communities are fully involved throughout the consenting and regulatory processes. The UKOOG website also contains a wealth of other information on the industry and its regulation, which will be useful in drafting any supporting text for inclusion in the Proposed Plan <http://www.ukoog.org.uk/>

The other recent document, which is of particular relevance to the industry, is the BGS publication referred to above prepared on behalf of DECC 'The Carboniferous shales of the Midland Valley of Scotland: geology and resource estimation', which provides data on the geology underlying West Lothian and the possible extent of oil and gas resources that may exist. See https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/324541/BGS_DEC_C_MVS_2014_MAIN_REPORT.pdf

CURRENT PLANNING POLICY REGIME

The Main Issues Report suggests that the Council's preferred approach is to continue to implement the existing policies of SESPlan and the West Lothian Local Plan.

SESPlan states, at paragraph 104, that "It is also recognised that the SESPlan area contains reserves of onshore gas including coal bed methane. LDPs should support extraction subject to local planning considerations.

Policy 4 in SESPlan, which relates to minerals extraction in general, states that Local Development Plans should, amongst other matters, safeguard resources from sterilisation from other development where they are of "a sufficient scale or quality to be of potential commercial interest and their extraction is technically feasible and may be carried out in a way that is environmentally and socially acceptable. Local planning authorities should also "set out the criteria to be addressed when assessing individual proposals, including restoration and enhancement".

Policies in the West Lothian Local Plan, although pre-dating SESPlan, are generally similar in the approach taken therein with Policy NWR 1 seeking to safeguard important deposits of all minerals and Policies NWR 4 and 5 setting out the circumstances in which mineral extraction will be supported (Policy NWR 4) or not supported (Policy NWR 5). Policy NWR 4 reflects SESPlan in seeking to support extraction where it can help with the rehabilitation of existing derelict or contaminated land, where there are tangible economic benefits, and where development can proceed in a socially and environmentally acceptable manner. Policy NWR 5 in many respects sets out the converse, but includes a 500m buffer zone to a community as a specific policy requirement to be met.

DISCUSSION AND PROPOSED ALTERNATIVE APPROACH

The extraction of oil and gas onshore has a long history in the West Lothian, going back to 1851. Bathgate was supplied with shale gas during the 1850s. West Lothian was a large oil producer up until the 1960s. The oil was produced from mining and retorting shale with a high organic content. There was some gas production from a gas well in Pumpherston in the 1960s.

In Scotland, offshore oil and gas extraction is, and will remain, a very important industry to Scotland contributing massively to the economy in terms of revenue and jobs.

Potentially, the onshore oil and gas industry could be investing upwards of £350 million a year in the Scottish economy, assuming Scotland has 10% of the UK activity, with an expectation that, upon successful extraction, the community will benefit financially. On the same assumptions, job creation will be 6,400 jobs.

The UK Government has recently backed the industry's voluntary offer to give communities £100,000 for every shale gas site on which there is hydraulic fracturing. One per cent of revenues will be paid to communities if gas is produced. This could potentially put millions of pounds in the local economy of West Lothian.

Furthermore, there will be opportunities within the industry for hundreds of skilled and unskilled jobs and, with the Central Belt, and West Lothian in particular, having a long and proud history of extraction industries, many of these jobs will be filled by local people.

It is equally clear that both in terms of wider UK energy policy, and that in Scotland, that this industry is supported and is expected to play its part in a balanced, and secure, approach to meeting the country's energy needs going forward.

Nevertheless, it is accepted that it is, for many, a controversial industry and quite rightly this has led to careful scrutiny by the UK and Scottish Governments, particularly through the Independent Expert Scientific Panel in Scotland. The findings of this Panel being particularly important in showing that the industry can move forward, and be successful, in the context of the current consenting and regulatory regime, and with appropriate safeguards in place to protect the environment and local communities.

With this level of regulatory and industry-led reassurance in place, it is hoped that the Council, in terms of its forthcoming Proposed Plan, will be supportive of the onshore oil and gas industry. By all means have a balanced planning policy, but this should start from a premise that the Proposed Plan supports the oil and gas industry, subject to appropriate checks and balances being in place, rather than suggesting the reverse.

The Main Issues Report suggests that the preferred approach is to maintain the policy regime from the West Local Plan, but it is considered that this is no longer fit for purpose in the sense that it pre-dates recent SPP (and SESPlan) guidance and does not reflect the needs of the onshore oil and gas industry.

In particular, Policy NWR 5 includes a community buffer zone of 500m, which is considered incompatible with SPP. The issue of buffer zones was considered during the SPP's committee stage and the final version of SPP, now in force, was published following the Minister for Local Government and Planning, Derek Mackay, making it clear, in his response to the Rural Affairs, Climate Change and Environment Committee, dated 9th May 2014, that buffer zones should not be set at a national level, but instead should be set out by the applicant as a response to understanding the impacts of the proposed development and be set to protect "sensitive receptors from unacceptable risks" (SPP paragraph 245). It might be that, in certain cases, a buffer zone of 500m is appropriate, and for certain environmental impacts, but such a restriction across the board is clearly inappropriate. The Proposed Plan should thus be drafted to make it consistent with paragraph 245 of SPP.

It is also considered that the way policy is drafted in the West Lothian Local Plan, split into supported and unsupported circumstances, is somewhat repetitive, nor is it in line with the generally positive sentiment in SPP and SESPlan. Therefore, it is suggested that a simple single policy could be introduced in the Proposed Plan that replaces the existing range of policies and specifically relates to the onshore oil and gas industry (a separate policy can then be drafted for coal reflecting the slightly different regime in SPP relating to that separate industry). This new policy would set out the social and environmental issues to be considered in relation to proposals and would come from the perspective of the industry generally being supported, unless it causes unacceptable levels of harm to those interests as set out in paragraph 237 of SPP.

Therefore, in a sense what ReachCSG is requesting is a version of the 'Alternative approach' set out in the Main Issues Report whereby it is accepted that the whole of West Lothian is a 'broad area of search' for oil and gas, subject to appropriate social and environmental safeguards, but without any indication being given as to buffer zones. If the Council want to include reference to these, this should be as a separate SPP-compliant policy.

A policy for inclusion in the Proposed Plan could thus be worded as follows.

"The onshore oil and gas industry is important for job creation and maintaining a diverse energy mix and improving energy security. As such, the Council is generally supportive of proposals for exploration and production within West Lothian subject to proposals being supported by a risk assessment that appropriately deals with the following issues:

- disturbance, disruption and noise, blasting and vibration, and potential pollution of land, air and water;
- impacts on, and benefits for, local communities;
- effect on the local and national economy;
- cumulative impact;
- effects on natural heritage, habitats and the historic environment;
- landscape and visual impacts;
- transport impacts; and
- restoration and aftercare (including any benefits in terms of the remediation of existing areas of dereliction or instability."

If the Council wish to include a specific requirement for community engagement in relation to proposals, whether or not the proposal constitutes a 'Major' development and, therefore, requires formal pre-application consultation, then ReachCSG is content for this to be included. This could also make reference to the UKOOG Community Engagement Charter and the financial benefits to the local community that the industry has signed-up to.

Finally, if the Council wish to mention buffers, then the following separate policy can be included in the Proposed Plan, or this statement added to the planning policy above, with the wording taken straight from paragraph 245 of SPP.

"The evidence from, and outcome of, the [risk] assessment should lead to buffer zones being proposed in the application, which will protect all sensitive receptors from unacceptable risks."