

# West Lothian Local Development Plan

FOR OFFICIAL USE  
ONLY

Date:

Submit by Email

Print Form



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](mailto: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:

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

Name		<input type="radio"/> Mr <input type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <i>(please tick as)</i>
Organisation <i>(where applicable)</i>	<b>WALKER GROUP (SCOTLAND) LTD</b>	
Postal address	<b>WESTERWOOD HOUSE ROYSTON ROAD DEANS INDUSTRIAL ESTATE LIVINGSTON</b>	
Postcode	<b>EH54 8AH</b>	
E-mail	<b>graemep@walkergroup.co.uk</b>	
Telephone	<b>01506 413101</b>	

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?

Development is required to be identified in locations where developers want to build and where there is a proven market demand for housing.

#### Question 2

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

NO

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?

Development in the right locations should have regard to locations where people want to live, where there is demand and where land values are sufficient to support delivery of infrastructure.

#### Question 4

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

No comment.

## 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 & Houston 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 Balfourie 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?

YES  NO  Don't know

Do you have any additional comments?

No comment.

### Question 6

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

YES     NO     Don't know

Do you have any additional comments?

No comment.

### Question 7

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

No comment.

### 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?

No comment.

### 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?

No comment.

### 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?

No comment.

### Question 11

Do you agree that a site at Balgornie 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?

No comment.

## 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?

No comment.

### 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?

No comment.

### Question 14

Do you have any other alternative approaches?

What are they and how would you make them work?

No comment.

### 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

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

#### 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 five year 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?

The Walker Group supports the allocation of a generous supply of effective housing land within West Lothian. Additional allocations should include a range of sites in various new locations and settlements around the District as well as further allocations within the CDA's to support the delivery of infrastructure where this is necessary to ensure the effectiveness of the original allocations.



### 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?

NO

### Question 18

Do you have another alternative strategy?

What is it and how would you make it work?

WLC could bring forward additional sites which do not have the infrastructure constraints of some of the current allocations. These additional sites could be brought forward in the short term to maintain the 5yr effective housing land supply.

### Question 19

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

Bring forward additional sites which do not have the infrastructure constraints of some of the current allocations.

### 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?

YES     NO     Don't know

Do you have any additional comments?

The removal of existing allocations from the Plan should only be undertaken where the Council is clear that there are no prospects for the development of the site in any circumstances. Temporary in-effectiveness alone would not be a reason for de-allocation. De-allocating sites should only be used as a last resort or where the current land use represents the preferred use. Furthermore, if sites contained in the 2012 HLA are to be de-allocated, in order that the preferred option (Scenario 3 of the MIR) is not diluted or undermined the Council will require to replace those sites which are de-allocated over and above the 3500 additional houses proposed to be allocated in the preferred strategy. An assessment of the MIR document shows that the total number of units proposed to be de-allocated from the supply of currently committed development **is in excess of 700 units**. The Council should identify replacement sites as alternatives to these de-allocated units.

### Question 21

Do you agree with the 'Alternative' option for the removal of existing housing allocations from the development plan?

YES     NO     Don't know

Do you have any additional comments?

See Q21 above, however, the Council should identify a **minimum of 700 replacement sites** as alternatives to these de-allocated units.

### 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?

## The Core Development Areas (paragraphs 3.74 - 3.76)

### 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?

The Walker Group do not consider that Winchburgh is the only CDA which should benefit from further allocations. Other CDA's could benefit from "continued support" to overcome infrastructure constraints and ensure their viability.

#### 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?

The Walker Group seek a further expanded CDA allocation of land at Mossend / Cleugh Brae sufficient to deliver necessary infrastructure. In addition, the Council should acknowledge the increased capacity of the original allocation. Allocating additional expansion sites, combined with an amendment to the allocated site boundary and an acknowledgement of the increased capacity arising out of the detailed design of the committed allocations can deliver a total of circa 826 units, which represents an **additional 526 units** over that which is accounted for in the established housing land supply. (see Walker Group Mossend / Cleugh Brae Capacity Assessment). See "additional information" page below and accompanying submissions.

**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?

NO COMMENT

**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?

NO COMMENT

**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?

NO COMMENT

**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

YES     NO     Don't know

Do you have any additional comments?

NO COMMENT

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

YES     NO     Don't know

Do you have any additional comments?

NO COMMENT

**Question 30**

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

NO COMMENT

**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?

NO COMMENT

**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?

NO COMMENT

**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?

NO COMMENT

**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?

NO COMMENT

Affordable housing (paragraphs 3.101 – 3.107)

**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?

The Walker Group supports a review of the Council's current affordable housing policy which has proved difficult to deliver, particularly within the CDA's where the additional requirement, beyond the transfer of fully serviced land capable of delivering 15% of the total site capacity, is stated as **equating to 10% of fully complete affordable houses**. The only option has been to address the additional 10% requirement in exactly the same manner as the initial 15%, i.e. the transfer of fully serviced land. WLC should review the percentage threshold across the District and adopt a consistent and equitable level of affordable housing across the District, albeit having regard to local need.

**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?

The current affordable housing policy requires to be reviewed.

**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?

NO COMMENT



## 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?

The Walker Group accept that infrastructure requirements have to be funded from new development and developer contributions. However, the current batch of SPG operated by WLC, does not actually set out how the infrastructure can be delivered, only what the cost per unit equates to. Furthermore, the SPG fails to provide any guidance to developers with regards the phasing of payments and this is left to the arbitrary negotiation with Council officers. This is unsatisfactory.

#### 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?

WLC who assume responsibility for collecting contributions, should take responsibility for delivering the necessary infrastructure. This should be set out in the same SPG which establishes contribution levels.

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?

NO COMMENT

#### 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?

NO COMMENT

#### Question 44

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

YES     NO     Don't know

Do you have any additional comments?

NO COMMENT

#### 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?

NO COMMENT

### 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?

NO COMMENT

### 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?

NO COMMENT 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?

NO COMMENT

### 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?

NO COMMENT

### 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?

NO COMMENT

### 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?

NO COMMENT

### 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?

NO COMMENT

### 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?

NO COMMENT

### 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?

NO COMMENT



### 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?

NO COMMENT

### 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?

NO COMMENT

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?

NO COMMENT

### 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?

NO COMMENT

### 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?

NO COMMENT

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?

NO COMMENT

### Question 61

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

YES     NO     Don't know

Do you have any additional comments?

NO COMMENT

### 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?

NO COMMENT

### 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?

NO COMMENT

### 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?

NO COMMENT

### 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?

NO COMMENT

### 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?

NO COMMENT

### 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?

NO COMMENT

### 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?

NO COMMENT

*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?

NO COMMENT

### 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?

NO COMMENT

#### 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?

NO COMMENT

#### 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?

NO COMMENT

### 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?

The Walker Group supports bringing forward additional housing sites at Dechmont and if these sites provide a momentum to bring forward the Bangour Hospital site then that is to be supported. However, the additional allocations should not themselves be constrained by the inability of the Bangour Hospital landowners to deliver an effective housing site. The conservation status of the Bangour Hospital site and listed buildings bring about unique challenges to the delivery of the site. The additional allocations, such as Burnhouse (PJ-0006) can be developed independently of the Hospital site. The Dechmont (and Bangour) settlement statement (MIR, pg 137) suggests that there is available infrastructure and that far from supporting the Bangour site, the allocations are required to support falling school rolls.

### 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?

Dechmont is a good marketable location and the allocation of further development opportunities in an area where the Council has identified existing infrastructure capacity is consistent with the need to deliver additional effective land in sustainable locations.

### 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?

NO COMMENT

**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?

NO COMMENT

**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?

NO COMMENT

**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?

NO COMMENT

**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?

NO COMMENT

### 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?

NO COMMENT

### 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?

The delivery of public art via developer contributions does not meet the test of necessity, reasonableness or scale and kind in terms of Circular 3/2012: Planning Obligations and Good Neighbour Agreements. Public art, whilst a laudable aim, is considered to be an extraneous benefit and as such should cease to be required.

### 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?

See Q83 above.

### 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?

NO COMMENT

### 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?

NO COMMENT

### 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?

NO COMMENT

### 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?

NO COMMENT

### 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?

NO COMMENT

### 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?

NO COMMENT

### 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?

NO COMMENT

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?

NO COMMENT

### 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?

NO COMMENT

**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?

NO COMMENT

**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?

NO COMMENT

**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?

NO COMMENT

**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?

NO COMMENT

**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?

NO COMMENT



## Additional information

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

### **QUESTIONS 23, 24 & 25:**

#### **MOSSEND / CLEUGH BRAE**

The Council should consider the following three options for Mossend Cleugh Brae:

(a) seeking a recognition of the increase in the capacity of existing CDA allocations at Mossend / Cleugh Brae from **300 units to 523 units**;

(b) adjusting the site boundary of existing allocations at Mossend / Cleugh Brae to more logical and defensible boundaries **creating capacity for a further 59 units taking capacity to 582 units**, and;

(c) to seek a further expanded CDA allocation of land at Mossend / Cleugh Brae to deliver a further **240 units**, sufficient to deliver necessary infrastructure.

In total these measures represent an **additional 526 units** over that which is accounted for in the established housing land supply.

As a result of more detailed design layouts and assessment of appropriate densities, the total anticipated capacity for Mossend / Cleugh Brae is **523 units**, an additional 223 units over the allocation of 300 in the adopted WLLP2009.

The proposed amended site boundary is illustrated in the Capacity Assessment document (appendix 1) and demonstrates that, applying appropriate densities, a further 23 units can be achieved at Mossend (MO) and 36 units at Cleugh Brae (CB). As a result of these logical boundary amendments the total anticipated capacity for Mossend / Cleugh Brae is **582 units**.

The expansion potential of Mossend (MO) and Cleugh Brae (CB) takes the form of 4 development parcels to the north of the existing allocations and is illustrated in the Capacity Assessment document. Justification for the expansion of Mossend (MO) and Cleugh Brae (CB) beyond those factors already mentioned is explained by the need for additional development to support the new A71 junction and relief road required to facilitate any development beyond that already consented. Expanding Mossend (MO) and Cleugh Brae (CB) in the manner illustrated in the Capacity Assessment document could deliver a further **240 units** which would support the provision of the necessary infrastructure i.e. the A71 link road and access to the Park & Ride. These additional units could be brought forward in the period to 2019.

**Allocating additional expansion sites, combined with an amendment to the allocated site boundary and an acknowledgement of the increased capacity arising out of the detailed design of the committed allocations can deliver a total of circa 826 units**, which represents an **additional 526 units** over that which is accounted for in the established housing land supply.





**West Lothian Local Development Plan**

**Main Issues Report**

**Consultation Response**

**by**

**Walker Group (Scotland) Ltd**

**MOSSEND / CLEUGH BRAE  
WEST LIVINGSTON CDA**

**October 2014**

## **MOSSEND / CLEUGH BRAE**

### **Introduction**

This submission proposes to address the current housing shortfall identified in SESPlan by;

(a) seeking a recognition of the increase in the capacity of existing CDA allocations at Mossend / Cleugh Brae from **300 units to 523 units**;

(b) adjusting the site boundary of existing allocations at Mossend / Cleugh Brae to more logical and defensible boundaries **creating capacity for a further 59 units taking capacity to 582 units**, and;

(c) to seek a further expanded CDA allocation of land at Mossend / Cleugh Brae to deliver a further **240 units**, sufficient to deliver necessary infrastructure.

In total these measures represent an **additional 526 units** over that which is accounted for in the established housing land supply.

Whilst new land and sites will be allocated within West Lothian in the forthcoming LDP, the advantage of increasing capacity, rationalising site boundaries and expanding the current allocations at Mossend / Cleugh Brae is that it would be building upon an effective allocation which already has the benefit of planning permission. Making better use of existing and planned provision will help to achieve the objectives of the present West Lothian Local Plan. The economies of scale that are achieved and the ability to plan ahead by incremental growth would help to delivery the vision embodied in the original CDA's. The allocation of further land will help to make this happen by offering improved value and therefore the ability to fund infrastructure.

Allocations were made in the adopted WLLP2009 for the release of sites identified as Mossend (MO), Cleugh Brae (CB) and Gavieside Farm (GF) at West Livingston/Mossend allocation within the Livingston & Almond Valley CDA. The total West Livingston/Mossend capacity was given as 2200, split between Mossend (200), Cleugh Brae (100) and Gavieside Farm (1900). The current overall allocation for Mossend / Cleugh Brae is **300**.

### **Increasing Capacity**

Since adoption of the WLLP2009, applications for planning permission have been submitted and are minded to grant on part of Mossend (MO). The applications include detailed permission for 173 private units with outline consent for 58 affordable units, comprising a total of 231 units. However, this increase over the acknowledged WLLP capacity of 200 is proposed to be developed only part of the allocated site. A capacity assessment has been prepared which provides details of numbers, site areas and densities achieved. **(appendix 1)** There remains a balance of Mossend which is available for further development equivalent to circa 168 units assuming appropriate densities for both affordable and private development. The total developable capacity of Mossend (MO) is therefore **399 units**. At Cleugh Brae (CB) no details have been submitted at this time, however assuming an appropriate density of circa 30 dwellings per hectare (dph) and allowing for a Park and Ride, the allocated site has capacity to accommodate circa **129 units**.

As a result of more detailed design layouts and assessment of appropriate densities, the total anticipated capacity for Mossend / Cleugh Brae is **523 units**, an additional 223 units over the allocation of 300 in the adopted WLLP2009. In addressing the housing land requirements for the LDP the Council should acknowledge the increased development capacity of the Mossend / Cleugh Brae allocation. These additional units could be brought forward in the period to 2019.

### **Amending Allocated Site Boundaries**

Having acknowledged the increased capacity within the boundaries Mossend / Cleugh Brae allocation as defined on the proposals map of the WLLP2009 and having regard to the detailed site analysis and design work undertaken to support the planning applications previously referred to, the Walker Group have identified boundary changes which would rationalise the site boundaries for both allocations which relate more closely to physical elements and a development framework for the wider area. It is therefore proposed that **the eastern boundaries of both Mossend and Clough Brae, as defined on the WLLP2009 Proposals Map, be amended to take account of the location of the proposed A71 link road.** The proposed amended site boundary is illustrated in the Capacity Assessment document (appendix 1) and demonstrates that, applying appropriate densities, a further 23 units can be achieved at Mossend (MO) and 36 units at Cleugh Brae (CB). As a result of these logical boundary amendments the total anticipated capacity for Mossend / Cleugh Brae is **582 units**. These additional units could be brought forward in the period to 2019.

### **Mossend / Cleugh Brae Expansion**

To provide a generous housing land supply, provide local flexibility for the LDP and to continue to support the delivery of the CDAs, the Walker Group consider that there is significant potential to further expand the Mossend and Cleugh Brae allocations. The Capacity Assessment (appendix 1) explores the potential expansion of Mossend (MO) and Cleugh Brae (CB) having regard to the landscape framework. The promotion of additional housing within established allocations such as Mossend / Cleugh Brae is entirely consistent with the MIR in that (a) it will contribute towards providing a generous supply of housing land which is proven to be effective, (b) it represents the continued promotion of development within the core development areas, namely West Livingston/Mossend, (c) it will make the existing development strategy more robust by improving viability and (c) additional land will be made available to support the Council's new build housing programme for the provision of affordable housing.

The expansion potential of Mossend (MO) and Cleugh Brae (CB) takes the form of 4 development parcels to the north of the existing allocations and is illustrated in the Capacity Assessment document. Justification for the expansion of Mossend (MO) and Cleugh Brae (CB) beyond those factors already mentioned is explained by the need for additional development to support the new A71 junction and relief road required to facilitate any development beyond that already consented. The MIR acknowledges that the infrastructure burden in larger developments such as the West Livingston/Mossend allocation is significant and there is a risk that these large developments will not progress beyond a certain stage. This could happen if an infrastructure constraint is reached and the cost of addressing the constraint is too costly, thus making future development unviable. At Mossend / Cleugh Brae the infrastructure constraint of the A71 link road is a barrier to the development of the balance of the site and the delivery of Gavieside Farm (GF, 1900 units) itself.

The committed development of 231 units is supported by a Transport Assessment which requires mitigation of traffic lights at West Calder Mains

Street. A further 40 units has also been identified as being capable of development without further impact on the operation of the surrounding road network. Therefore, whilst, the existing road network has been able to support the initial development of circa 270 units (supported by a Transport Assessment), development beyond this is constrained until such time as the A71 link/relief road is capable of being delivered. There is insufficient value in the allocated scheme to overcome infrastructure constraints. The cost of delivering the A71 link / relief road cannot be supported by the development of the balance of Mossend and Cleugh Brae (circa 250 units), which remains constrained until it is delivered. It is clear therefore that additional development to support the necessary infrastructure, namely the new A71 link road, is required.

The Capacity Assessment examines options for further development in and around the existing allocation. Expanding Mossend (MO) and Cleugh Brae (CB) in the manner illustrated in the Capacity Assessment document could deliver a further **240 units** which would support the provision of the necessary infrastructure i.e. the A71 link road and access to the Park & Ride. These additional units could be brought forward in the period to 2019.

### **Conclusion**

Supporting the proposed expansion of Mossend / Cleugh Brae would be consistent with the Council's preferred housing strategy to promote sustainable development locations and continue to support development in the CDAs. **Allocating additional expansion sites, combined with an amendment to the allocated site boundary and an acknowledgement of the increased capacity arising out of the detailed design of the committed allocations can deliver a total of circa 826 units**, which represents an **additional 526 units** over that which is accounted for in the established housing land supply.



## Appendix 1 – Capacity Assessment including drawings



**MOSSEND / CLEUGH BRAE**  
CAPACITY ASSESSMENT

## MOSSEND / CLEUGH BRAE CAPACITY ASSESSMENT

This study is threefold

- A capacity assessment of the West Lothian Local Plan (2009) allocated area
- A capacity assessment of the proposed rationalisation of the WLLP2009 allocated area
- A capacity assessment of a potential expansion area

### CAPACITY ASSESSMENT OF THE ALLOCATED AREA

#### Local Plan Allocation

The area allocated is illustrated in the first drawing. The sites are identified as Mossend (MO) and Cleugh Brae (CB). They form part of the wider West Livingston Core Development Area (CDA). The total CDA has an allocation of 2200 split between Gavieside Farm (GF) at 1900 with the balance of 300 and Mossend and Cleugh Brae.

Current overall allocation for Mossend and Cleugh Brae = **300**.

#### Mossend

The second drawing is the Development Framework (DF) submitted as part of the application for site J below. Site references below follow those established in the DF.

##### Site J

Part of Mossend, site J, is the subject of a "Minded to Grant" Planning Permission (0349/FUL/11). This permission is for 173 units on a net area of 6.7ha resulting in a density of 26/ha. To comply with the Council's policy for Affordable Housing part of the adjacent site Y has been identified. This site is intended to accommodate a 25% provision i.e. 58 units on a site of approx 1.9ha at a density of 30/ha. This area is the subject of an application for Planning Permission in Principle ref. 0337/P/13.

Current numbers "Minded to Grant" = **231**.

##### Balance of Site J

A test layout for the balance of site J has produced 32 private units on an area of 1.1ha. The associated Affordable Housing requirement is 11 units on a site of 0.31ha.

Proposed numbers = circa **40**.

##### Site in West Lothian Council ownership

Area net of open space provision = 1.8ha. A density of 30/ha assumed resulting in 54 units.

Proposed numbers = **54**.

##### Site K

The area of this site is 2.8ha. A density of 26/ha has been applied resulting in 73 units. The split between private and affordable would be rationalised later.

Proposed numbers = **73**.

**The total balance of Mossend which remains = circa 167 units.**

#### Cleugh Brae

##### Site Z / Mixed Use site

It is proposed that the whole of Cleugh Brae, minus that required for the Park & Ride site, be considered for housing. The site area is 4.3ha. A more dense development is envisaged here (reflects also the Affordable housing requirement element) 30/ha resulting in 129 units.

Proposed number = **129**.

##### Park & Ride

The site is sized at 1.2ha and is capable of providing 250 parking spaces as well as bus turning facilities.

As a result of more detailed design layouts over most of the currently allocated Mossend and Cleugh Brae sites, the anticipated capacity for these sites is 527 which is **an additional 227 units** over the 300 allocation.

The third drawing illustrates the above sites with their number allocation.

## CAPACITY ASSESSMENT OF THE RATIONALISATION OF THE ALLOCATED AREA

The fourth drawing is one previously presented to the Council attempting to rationalise the boundaries of Mossend (MO) and Cleugh Brae (CB) allocations relating them to physical elements.

It is proposed that the northern boundaries of both sites be taken to their respective rivers thereby including the river corridors within the allocated area allowing them to be incorporated within the proposals.

That for site J has already been incorporated within the current applications.

It is proposed that the eastern boundaries of both sites be taken to the proposed A71 link road which creates a new boundary for both areas.

Whilst the above does create a larger zoned area, the drawing also illustrates where within the allocated sites are not suitable for development due to topography. There is therefore a loss of development land within the original allocations which is replaced by the sites extension to the east.

### Extension to site K

This is an area of 0.9ha resulting in 23 units when a density of 26/ha is applied.

### Extension to site Z

This is an area of 1.2ha resulting in 36 units when a density of 30/ha is applied.

Proposed number in extension sites = **59**.

**Overall revised number = 586.**

The fifth drawing illustrates these sites and their numbers.

## CAPACITY ASSESSMENT OF A POTENTIAL EXPANSION AREA

### Potential expansion area

#### 1.0 General

##### 1.1 Background

As explained above the currently allocated sites have capacity for additional units.

The promotion of that potential increase in numbers requires to be recognised in the forthcoming Local Development Plan (LDP). However, to meet the Council's target figures for allocations there is a need for further increased numbers within West Lothian.

The potential to further expand the Mossend (MO) and Cleugh Brae (CB) allocations to address this need is explored in the following.

##### 1.2 Objective

In addition to addressing the needs highlighted above there is another fundamental purpose behind the further increase in numbers.

Completion of house numbers at MO / CB is constrained by traffic impact. The currently approved phase 1 limits development to around 240 units. Traffic flow from Cleugh Brae to West Calder Mains Street being the location of the constraint. A recent update of the traffic impacts arising from the development of the balance of site J i.e. some 40 units, thereby taking the total units to 270, has been shown to meet WLC Transportation standards, however development beyond this level is constrained for reasons of traffic impact.

The DF illustrates a relief road running from a new junction with the A71, at the east side of West Calder, to a new junction with Mossend Road, north of the allocated sites. This relief road is needed to facilitate further development.

The viability of the development of the balance of the allocated sites, even at the higher capacity of circa 586, cannot support the cost of this necessary infrastructure associated with the development of the West Livingston / Mossend CDA (WLLP, Appendix 7.1; "new distributor road network linking A71"). Previous attempts to seek assistance from the West Lothian Council Infrastructure Fund were unsuccessful.

Further increasing the extent of the allocation at MO / CB would offer the potential to support the necessary infrastructure provision.

MO / CB forms part of the wider West Livingston CDA. The balance of the CDA, Gavieside Farm (GF, 1900 units), should contribute to the necessary road infrastructure provisions at MO / CB, however the inclusion of Gavieside is not possible due to the initial investment necessary to introduce infrastructure into a relatively remote area. MO / CB however does benefit from its location next to West Calder and as such needs to be considered as a stand alone development.

- 1.3 Potential benefits of the extended area
- Address the Council's need to allocate additional land for housing
  - Delivers a much needed Park & Ride for West Calder Station
  - Appropriate location of further major affordable housing allocations
  - Allocation located in a sustainable and marketable location
    - adjacent to existing community / schools / shops etc
    - excellent transportation links including Park & Ride
    - easier introduction of public utilities
  - Facilitates the viability of necessary infrastructure
  - Delivers a much needed link road

A Development Framework illustrating the proposed expansion area is included as the sixth drawing.

2.0 Assessment of influences on development

2.1 General

The proposed additional extension area is located to the north of the existing allocation. Like the current allocations it is located and well contained between the two riverside corridors created by the Breich Water and the West Calder Burn. It also attempts to relate to the existing committed development site currently approved at Briestonhill Moss (Planning Ref 0272/P/08).

2.2 Landscape Framework

The approved development at Briestonhill provides a strong landscape framework to its northern and eastern boundaries.

Existing extensive woodland planting exists to the north of the West Calder Burn.

To the west the Breich Water corridor provides a buffer to the countryside similar to that relevant in the existing allocations.

These existing elements combine well with some additional small scale extensions to create an appropriate and balanced setting within which development can be integrated.

The West Calder Burn and its existing woodland planting already creates an important barrier with regards to coalescence with Polbeth and as such would continue to act so.

2.3 Previous / current use

Large parts of the proposed areas have been in previous use primarily related to the past mining history of the area. Pit No 11 and associated railways were located on the site. An old school was also present. These areas could be considered to be Brownfield.

There are existing dwellings within the boundary of the proposed area.

2.4 Road Network

The proposed location is well served by existing and proposed roads. The proposed link road is now located centrally within the development maximising its potential.

3.0 Development Framework

3.1 General

The potential development parcels are illustrated in the DF as well as appropriately located open space provisions.

The completed landscape framework is illustrated.

The existing proposed path network is extended to link into the new area combining the proposed new open space with the two riverside corridors.

3.2 Development area

3.2.1 Residential sites J, K, Y and Z along with the Mixed Use and Park & Ride sites are those within the current allocation. As presented above these sites could produce circa **586 units**.

3.2.2 The sites identified for the potential expansion total 9.3ha (23ac) and have the capacity to deliver an additional **240 units**.

**Proposed number in expansion area = 240.**

In summary the additional expansion area, when added to the potential capacity of the rationalised allocated sites would potentially accommodate **826 units**. Development of this extent would support the provision of the necessary infrastructure i.e. the A71 link road and access to the Park & Ride.

#### 4.0 Test layouts

##### 4.1 General

A draft test layout has been produced to assist in confirming the extent of the net development areas as well as areas for open space and SUDS.

##### 4.2 Net Area analysis

This drawing confirms the extent of the sites which would contribute to the overall infrastructure provision. These are the sites within the Walker Group's control. There are potentially two other sites in the north west sector which could be included if landowners were to co-operate. The net area attempts to reflect the Affordable Housing allowance also (at 15%) as this would not contribute to the infrastructure.

##### 4.3 Primary elements

This drawing locates various assumptions on roads hierarchy.

The existing east / west road in the north of the site leading to Polbeth is to be widened with a footpath provision to the south and to be utilised as direct access to house plots.

The first section of the link road (northern part) within the development areas whilst at 6m wide accommodating a bus route will also be utilised for direct access to house plots.

The remaining section of the link road will be 6m wide with a 2m footpath adjacent to the west side terminating in a signalised junction on the A71.