

WLC REF:MIRQ0056

Dear Sirs,

West Lothian Local Development Plan: Main Issues Report

Submission on behalf of [REDACTED]

Request for Reassessment of Proposed Housing Site at Hartwood Road, West Calder

Site Ref: EOI-LATE 0009

We refer to your recent letter inviting comments on the West Lothian Local Development Plan: Main Issues Report.

On behalf of our client, [REDACTED], we wish to thank you for the opportunity to submit comments at this stage of the new LDP process, and would wish to request that you reconsider the particular merits and advantages of a proposed small scale housing development at Hartwood Road, West Calder for new residential development of approximately 10 to 12 units. The site has been given Site Reference EOI-LATE-0009 in the MIR document.

Whilst we have reviewed the full MIR, and are aware of the range of separate Consultation Questions, this submission is restricted to matters relating to Main Issue 3 – Housing growth, delivery and sustainable housing locations, and Question 15 of the MIR Questionnaire.

On behalf of the landowner, [REDACTED], we do not agree with the Preferred Strategy for housing growth in West Lothian insofar as it relates to West Calder and the non-allocation of land for residential development at Hartwood Road, West Calder (MIR Site Ref: EOI-LATE-0009).

On this basis, and in specific response to Question 15 of the Main Issues Report, we object to the Council's 'Not Preferred' status and the non-allocation of the site at Hartwood Road for small scale residential development in the emerging Local Development Plan.

On behalf of [REDACTED], we would therefore request that the merits and advantages of this small site are reconsidered in light of the information set out in the attached Supporting Planning

Statement, and the site removed from its current countryside designation and allocated as a specific housing development opportunity with capacity for around 10 to 12 units in the new LDP.

As requested, we have completed the attached Questionnaire in relation to Question 15. However, full details of the merits and advantages of this site are set out in the enclosed Supporting Planning Statement which sets out our full representation on this matter.

We trust this information will be of assistance to your consideration of this site, and would be happy to provide further details on this site if required.

We would be grateful if you would confirm safe receipt of this email submission, and keep us informed of progress on this matter.

Yours faithfully

John Handley

Director

John Handley Associates Ltd

1 St Colme Street

Edinburgh

EH3 6AA

Tel: 0131 220 8253

Mobile: 07826 870806

Email: john.handley@johnhandley.co.uk

Our Ref: JS/LEC LP/S/615/PL

17 October 2014

Development Planning
West Lothian Council
County Buildings
High Street
Linlithgow
West Lothian
EH49 7EZ

Dear Sir/Madam

WEST LOTHIAN LOCAL DEVELOPMENT PLAN - MAIN ISSUES REPORT

In response to the publication of your Main Issues Report, this representation seeks an allocation for a retirement village for the Pond site in Bathgate.

Banks Property support the more flexible approach to the range of uses that can be provided on existing employment land, as outlined in Main Issue 1: Economic Development and Growth. Banks Property consider the Pond site in Bathgate to provide a suitable opportunity for alternative uses and a site that can contribute to housing land supply targets, specifically providing a quality living environment for the elderly. This provides support for Main Issue 3: Housing Growth, Delivery and Sustainable Housing Locations.

A supporting statement has been provided along with a number of appendices. An indicative masterplan has been prepared to demonstrate the retirement village concept and is appended to this representation. This approach has been endorsed and supported by an established provider of housing targeted for elderly people, Bield Housing and Care.

Please can you acknowledge receipt of this representation. We would welcome the opportunity to discuss our proposals for the Pond site in more detail and would appreciate being kept informed on progress of the Local Development Plan.

Yours faithfully



James Seabury
Senior Development Planner

DD: 0844 264 4586
E: james.seabury@banksgroup.co.uk

West Lothian Local Development Plan Main Issues Report 2014

Proposed Housing Development
MIR Site Ref: LATE-0009
Land at Hartwood Road

Supporting Planning Statement

Submission on behalf of:



JOHN HANDLEY ASSOCIATES LTD

Chartered Town Planning Consultants

1 St Colme Street

Edinburgh

EH3 6AA

October 2014

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

**Proposed Housing Development
Land at Hartwood Road, West Calder
MIR Site Ref: LATE-0009**



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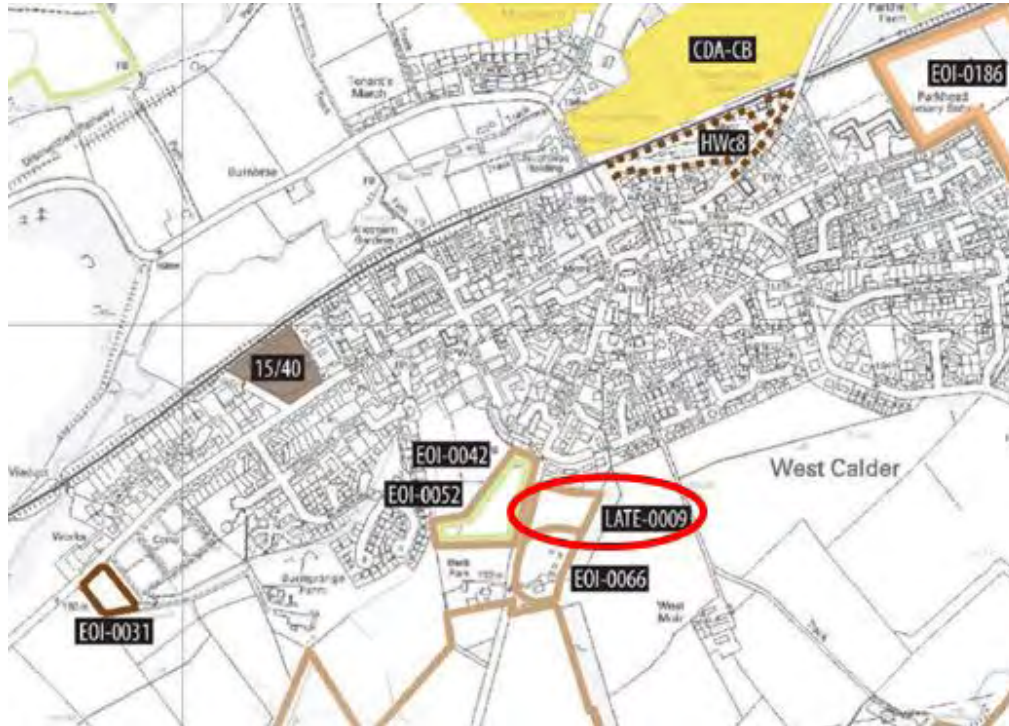
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1.0 Introduction

- 1.1 This Supporting Planning Statement has been prepared by Chartered Town Planning Consultants, John Handley Associates Ltd, on behalf of landowner and developer [REDACTED]. It is submitted in response to the Council's assessment of a 1.05 hectare site at Hartwood Road, West Calder in the Main Issues Report (MIR Site Ref: Late – 0009), and requests that the *'Not Preferred Site'* status in the Main Issues Report is reassessed by the Council, with the site allocated in the Proposed Local Development Plan as a new housing development opportunity with capacity for around 10 - 12 units.
- 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] does not agree with the Preferred Strategy for housing growth in West Lothian insofar as it relates to West Calder and the non-allocation of land for residential development at Hartwood Road.
- 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 objects to the Council's *'Not Preferred'* status and the non-allocation of the site at Hartwood Road for residential development in the emerging Local Development Plan.
- 1.7 **On behalf of [REDACTED] we would therefore request that the merits and advantages of this small site are reconsidered in light of the information set out in this Statement, and the site removed from its current countryside designation and allocated as a specific housing development opportunity with capacity for around 10 - 12 units in the new LDP.**

2.0 Main Issues Report

- 2.1 The site is identified in the MIR as *Site Late 0009 – Land southwest of West Calder*. The site is identified in the extract from the proposals map below:



Extract from WLLDP MIR Proposals Map 6 with site highlighted in red

- 2.2 The site at Hartwood Road is not identified as a preferred site for development in the Main Issues Report. The MIR considered that the site had the capacity for 20 residential units.
- 2.3 However it is the landowner's intention that the site would deliver 10 to 12 units on 0.25 acre plots. This would mirror the scale, layout and development of the small housing development to the north of the site (nos 36 – 46 Hartwood Road) which was built by ██████ in the 1990s and has proved an attractive and popular housing development. The impact of this proposed lower density development of the site has therefore not been considered by the Council and should therefore be reassessed in relation to what would be delivered on site at Hartwood Road.
- 2.4 A small allocation at Hartwood Road is considered to be deliverable in the short term and can contribute to West Lothian Council's aims and objectives for West Calder. The site can also make a small but effective contribution to the West Lothian housing land supply and meet the needs of a particular section of the local community.

2.5 The West Calder and Harburn Settlement Statement within the MIR considers issues within West Calder; infrastructure considerations; spatial strategy considerations; and priorities for the town.

2.6 An extract from the West Calder and Harburn Settlement Statement is detailed below:

Issues
Promote and maintain the employment base, tackle areas of social deprivation
Infrastructure considerations
The town is served by Parkhead Primary School, West Calder, St. Marys RC Primary, Polbeth and West Calder High School and St. Kentigern's High School, Blackburn.
Spatial strategy considerations
The availability of infrastructure, strategic location, and existing facilities make the town an attractive option for future development.
Priorities
Support and maintain existing local amenities and services; investigate measures to address traffic issues; address issues of social deprivation; provide local employment opportunities; provide community facilities to support anticipated levels of development associated with the Mossend Core Development Area and developments for housing granted at Cleugh Brae, also part of the CDA; upgrade site to the south of the community centre to provide a neighbourhood park; review park provision in the town and footpath links; review settlement envelope.

2.7 The allocation and development of the Hartwood Road 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 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 the 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. The NPF 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 allocation of the site at Hartwood Road for small scale residential development 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 Hartwood Road will provide an element of residential development to meet a small part of West Lothian's housing requirement and would contribute to the Council's Priorities for West Calder. The allocation of the site at Hartwood Road is 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”). West Calder 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 Hartwood Road 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 Hartwood Road 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 Hartwood Road 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 without any major infrastructure requirements.

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:

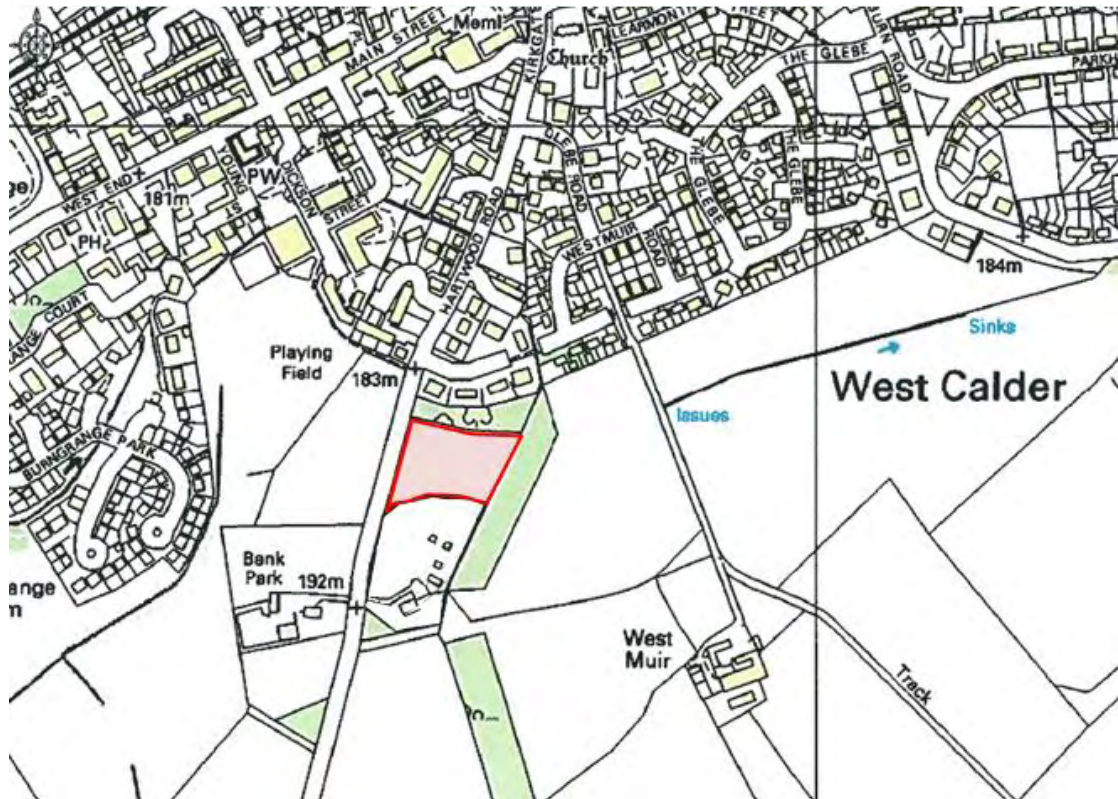
- a. The development will be in keeping with the character of the settlement and local area;*
- b. The development will not undermine green belt objectives; and*
- c. Any additional infrastructure required as a result of the development is either committed or to be funded by the developer”.*

3.24 The Hartwood Road 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 West Calder to accommodate the proposed development of c. 10 to 12 units. The allocation of this site in the new LDP would therefore accord with Policy 7 of the SESplan.

3.25 Sites such as that at Hartwood Road can therefore 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.

4.0 Site & Surrounding Area

- 4.1 The objection site is situated on the southern edge of West Calder, on the eastern side of Hartwood Road. The site lies outwith, but immediately adjacent to the existing settlement boundary and could be viewed as a logical and natural settlement extension, suitable for low density housing.
- 4.2 The site extends to 1.05 hectares and is used for rough grazing. To the south there is a further field and to the east there is a tree belt and agricultural fields and to the west lies Hartwood Road which connects this part of West Calder to the town centre and train station.
- 4.3 The mature tree belt to the east forms a strong defensible boundary and its continuation along the southern boundary creates a strong and enhanced physical boundary for the settlement.
- 4.4 Development would be contained comfortably within the landscape and would balance development to the west. The site is fully effective and its allocation would be in keeping with the settlement's scale and character. The site would add to the range and choice of housing available within West Calder.
- 4.5 The site is suitable for housing and is well related to the town and its range of facilities, services, education and transport infrastructure. The site is within walking distance of the railway station, bus routes and local facilities and there are no water or sewage constraints. The site benefits from strong defensible boundaries and its inclusion within the settlement would represent a logical boundary extension for the built up area.
- 4.6 The location of the site and its surrounding area are confirmed in the location plan and aerial and site photographs set out below.



Site Location Plan



Aerial Photograph showing location and relationship to existing settlement



Aerial Photograph showing location of site and relationship to existing housing



View of site looking north east from Hartwood Road



Existing housing development immediately to north of site

5.0 Proposed Development of Site

- 5.1 As noted above, the site is being proposed for the development of around 10 to 12 units on large 0.25 acre plots, which would mirror the scale, layout and development of the small housing development to the north of the site (nos 36 – 46 Hartwood Road) which was built by ██████ in the 1990s and has proved an attractive and popular housing development.
- 5.2 As the Local Development Plan emerges and a future planning application is progressed, a masterplan would be prepared for the site to demonstrate how the proposed small scale residential development would be compatible with the immediately adjacent housing and would be of a scale, density and character in keeping with the local area.
- 5.3 The proposed development would reflect best practice in the planning and design of new housing development. This would be a holistic approach that integrates urban design, land use, housing, transportation, ecology, landscape, conservation and energy efficiency.
- 5.4 The proposed development at Hartwood Road, while small scale, would provide a high quality, sustainable development which is planned and developed in a coordinated and integrated manner. The development would take advantage and maximise opportunities to integrate the new development with the existing settlement and set out a landscape framework which will enhance the setting of West Calder at this location.
- 5.5 The site could be developed with no apparent physical or environmental constraints. It can also be effectively and readily serviced and there are no constraints to its immediate development. Owing to the nature of the site, it is considered that its development could be contained comfortably into the landscape, permitting a small but high quality development in terms of design, layout and landscaping.
- 5.6 The development of this site would not only provide a desirable location to live but would also represent a sustainable approach to development, which takes advantage of existing and proposed new infrastructure. New housing would also help sustain the local community of West Calder and help extend services and facilities.

- 5.7 The location and nature of the site, including its ability to be accessed and its relationship with the existing residential development, confirm it as entirely suitable for private house building and its development would help provide for a variety and choice of locations for potential new house buyers in West Lothian.
- 5.8 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 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 each of the above in turn, with regards to ownership it is confirmed that the site is in the ownership of a party that is willing, and intends, to release the land for residential development and associated uses during the period of the Local Development Plan
- 6.4 With regards to the PAN requirements on physical constraints it is confirmed that there are no physical constraints of the nature listed in the PAN affecting the site.
- 6.5 There are no known contamination issues within the site nor is there any history of such.
- 6.6 There are no deficit funding issues with regard to the site. It is wholly in private ownership.
- 6.7 The site is marketable and the small scale development proposed would be a desirable addition to the settlement in a popular and attractive location. Subject to a grant of planning permission, completions on the site would be delivered within the LDP period and the site is therefore considered effective in terms of Paragraph 55 of the PAN.
- 6.8 The landowner confirms that housing is the preferred land use of the land in planning terms. The site could accommodate approximately 12 dwellings.
- 6.9 There are no known environmental issues that would prevent the site from delivering development over the plan period. The site comprises agricultural fields and is not covered by any environmental designation.
- 6.10 There are no known infrastructure constraints that would affect the development of the site for residential use. According to information provided by Scottish Water there is sufficient capacity in the local wastewater treatment works and in the local water treatment works to serve the site. There are no off site road capacity issues that would prevent development of the site for the small scale of development being proposed.
- 6.11 In relation to education capacity, it is considered that the small scale of development being proposed at Hartwood Road will generate a very limited number of additional school pupils which can be accommodated by existing or planned education capacity in the local area. Education provision should not therefore be regarded as an obstacle to the effectiveness of the site at Hartwood Road.

7.0 Recent Planning History

- 7.0 This site at Hartwood Road 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 Mossend 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 site has therefore been assessed 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 decided not to support the allocation of this site for residential development in the emerging Local Development Plan with a '*Not Preferred Site*' status in the Main Issues Report.
- 7.3 However, and as noted above, it is the landowner's intention that the site would only deliver around 10 to 12 units and not the 20 units suggested in the Council's MIR assessments. The impact of this proposed lower density development of the site has therefore not been considered by the Council and should therefore be reassessed in relation to what would be delivered on site at Hartwood Road.
- 7.4 We have reviewed and responded to the Council's assessment of the site in the following sections of this Supporting Planning Statement.

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 is not in accordance with the council's preferred development strategy which supports development within the core development areas and other strategic locations.

Generally, there are other more suitable sites available for development that can be brought forward to support development requirements. The Strategic Development Plan gives priority to redeveloping brownfield land in advance of greenfield sites such as this.

Development of this site would be visually and environmentally intrusive and detract from the rural character of the site and its surroundings.

Development could be prejudicial to the continued development of the CDA which the Council is committed to supporting.

There are concerns regarding access via Hartwood Road.

Though this site is not shown to be at risk of flooding on the flood hazard maps it is known from local knowledge that runoff from the site is a significant problem. There is also a history of flooding due to short-term lack of capacity in the public sewer. There would therefore be a requirement for a Flood Risk Assessment and Drainage Assessment to be submitted and for developers to satisfactorily demonstrate how this site could be developed in the context of the aforementioned difficulties

There is no education capacity available to support development of the site”

8.2 As stated previously the site was submitted as a candidate site through the Call for Sites exercise, a number of units was not specified for the site at that time. The council have assessed the site as being suitable for 20 units, however it is not [REDACTED] intention that the site would be suitable for that number of dwellings and instead the site is suitable for the development of around 10 to 12 units on large 0.25 acre plots.

8.3 As can be seen from the table below, the conclusions arrived at by West Lothian Council are not fully reflective of the consultation responses received nor of the Strategic Environmental Assessment conclusions regarding the development of the site.

8.4 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)	The site does not fall within the safeguarding consultation zone	
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.	Coal mining would be addressed as part of any future planning application package
Historic Scotland	No specific comments.	
HSE (Health and Safety Executive)	No specific comments.	
NHS - Lothian	Settlement wide review : Primary care requirements : West Calder : new facility should also cater for Polbeth CDA development	It is not anticipated that the scale of development will impact greatly on the NHS services provided in the area, however further dialogue could be had if appropriate and required.
Scottish Enterprise	No specific issues or concerns.	
Scottish Water	In terms of water supply the site is served by the PATESHILL water treatment works (WTW) where there is sufficient capacity. In terms of waste water treatment the site is served by the AVSE PFI EAST CALDER waste water treatment works (WWTW) where there is sufficient capacity.	Scottish Water would be further consulted during the planning application process.
SEPA - Flooding	SEPA have nearby records of 12 homes being affected in 2001 by a surcharging culvert. Allocation not located adjacent to watercourse	The issues with the Surcharging culvert have since been resolved through the development of the site to the north and there are no known drainage or flooding issues associated with the site.
SEPA – Water Environment	Standard SUDs sufficient to prevent deterioration of status and there is no requirement for a buffer strip and there are no restoration opportunities.	Appropriate suds would be designed as part of a future development of the site.
SNH	No Comments	
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 any impact on the strategic road network.

WLC – Contaminated Land	No potentially contaminative activities recorded on site. Potentially contaminative industries, e.g. mining, clay brick and tile works, have operated within the vicinity of the site.	There are known contamination issues and 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	It is anticipated that the small scale nature of the development would not generate enough pupils to adversely impact capacity at catchment schools.
WLC – Environmental Health		
WLC – Flood Risk Assessment	A Flood Risk Assessment is required for this site. Issues also of run off to public road would be unacceptable. Though this site is not shown to be at risk of flooding on the flood hazard maps we know from local knowledge that runoff from the site is a significant problem. There is also a history of flooding due to short term lack of capacity in the public sewer. Considerable thought would need to be given as to how this site could be developed in the context of the aforementioned difficulties. The usual attenuation and treatment of runoff criteria would apply.	The previous local drainage issues have been resolved through the development of the site to the north which included diversion of existing field drains, and there is no flooding risk associated with the site.
WLC – NETS and Land Services	No objections. Planning gain to be used to enhance quality of adjacent park. Review access to park across Hartwood Road.	This could be accommodated as part of the proposed development.
WLC - Transportation	New access required onto Hartwood 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 the boundaries of the site, which was shown as undeveloped farmland on the 1st and 2nd edition Ordnance Survey maps. The plot is located outside the area of increased archaeological sensitivity associated with the historic core of West Calder. It is apparent from current maps and aerial photographs that a number of large breezeblock sheds have been constructed in the field to the south, presumably associated with some form of agricultural use, but the plot itself appears to remain as Greenfield. The previously undeveloped nature of the site means that there may be some potential for buried material associated with earlier phases of occupation to survive, and as a result, it is likely that that archaeological evaluation should take place in advance of any development. Again, however, the likelihood of buried material being present will be limited by the relatively small size of the plot.	Archaeology would be investigated as part of technical reports at the planning application stage.

- 8.5 As the landowner responses demonstrate, there are no issues raised in the consultation responses that cannot be fully addressed. As stated above the Council's conclusion regarding the proposed development of the site do not fully reflect the issues or lack of issues raised through consultation. Past issues with drainage and flooding have been dealt with and there are no longer flooding issues at Hartwood Road. The proposed development is of a scale that it will not prejudice the delivery of the CDA, and the nature of the site means that housing can be delivered in the short term and is not reliant on large scale infrastructure associated with CDA development. The transportation response does not raise any issues regarding access onto Hartwood Road. The development of the site for a limited number of units would not be visually or environmentally intrusive and would not detract from the rural character of the site and its surroundings.
- 8.6 The suitability of the site for development is further confirmed through the Strategic Environmental Assessment of the site.

Strategic Environmental Assessment

- 8.7 The site at Hartwood Road was assessed in terms of suitability for 20 units, however much of the conclusions can be assumed for the smaller scale development now being proposed for the site and indeed some of the concerns raised will be mitigated by the reduced capacity of the site.
- 8.8 In relation to landscape fit, exposure and trees/boundaries the SEA conclusions are positive and states that:

"the site is not significantly elevated or exposed and there is shelter belt woodland and bush planting around all four sides of the site that is well contained. Although the site would lead to an incursion into the countryside, this could read as a natural extension to the settlement of West Calder in this location. The site would be read together with the existing housing development at Hartwood Road, as a natural extension to that housing development. The site has well defined boundaries on all sides. To the north is a woodland shelter belt that backs onto Hartwood Road. To the south is a small belt of trees that defines the boundary with the former travelling peoples' sites. To the east is a belt of mature deciduous woodland and to the west there is a mature hawthorn hedge that delineates the edge of the site with the 'C' class road."

8.9 In terms of site conditions the SEA is also positive and states that:

“The council’s contaminated land officer has identified no on site issues or constraints on this site. There appear to be no other constraints. There is no watercourse within the vicinity of the site and the site does not appear to be at flood risk from the SEPA Flood Risk Maps, however, the views of the councils Flood Prevention Officer should still be sought”

8.10 As confirmed above, the localised flooding and drainage issues have been resolved as part of the development of the housing site to the north, and are no longer present at Hartwood Road. The development of 10 to 12 units at this location would not increase flood risk or be at risk of flooding.

8.11 In relation to Transportation the SEA states that:

“The council’s Transportation Service require to confirm if the site could be accessed appropriately to the ‘C’ class road and whether the road would need upgraded and footpaths also introduced and the 30mph limit extended as at the moment this end at the houses Hartwood Road.”

8.12 It is anticipated that the reduction of the site capacity to 10 to 12 units will alleviate any concerns regarding access to the ‘C’ class road and that development will be safely accessed from Hartwood Road.

8.13 In relation to education, the SEA simply highlights that the education department will be required to prove comments. As stated previously it is anticipated that development of the small scale proposed at Hartwood Road will only generate a very small number of pupils and could be accommodated by available or planned education capacity in the local area.

8.14 The conclusions from the Strategic Environmental Assessment are also very positive and confirm that the site at Hartwood Road:

“could be developed for housing to an appropriate density at this edge of settlement location”.

- 8.15 As noted throughout this Supporting Planning Statement, the site is now being promoted for low density development, which is considered to be appropriate for this location. The SEA has confirmed that there are no issues in terms of transportation, education, flooding, ground conditions or biodiversity constraints that cannot be overcome or that would be an obstacle to the effectiveness and delivery of the site at Hartwood Road.
- 8.16 The Strategic Environmental Assessment of the site at Hartwood Road, by West Lothian Council, indicates that the site is suitable for the proposed scale of residential development. It should therefore be allocated for such in the emerging Local Development Plan Proposed Plan.

9.0 Summary of Benefits and Advantages of Site

- 9.1 Development of the site at Hartwood Road will enable West Lothian Council to comply with the policy requirements of SPP and 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, and the site at Hartwood Road, while small scale, is an effective and deliverable site and can contribute around 10 to 12 units in the short term to the housing land supply.
- 9.2 As noted in the Council's SEA document, the site is a logical extension to the settlement and would round off the existing settlement in a sustainable, viable and effective manner.
- 9.3 The site can be developed without any apparent physical or environmental constraints. In particular, the proposed residential development 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 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 and the accessibility benefits of West Calder.
- 9.6 Further new housing of the type being proposed for this site would help sustain the local community by providing additional variety and choice of housing for potential house buyers in West Lothian.
- 9.7 The allocation and development of the Hartwood Road site for new housing would therefore 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.

10.0 Conclusion

- 10.1 On behalf of our client, [REDACTED], we would therefore request that the particular merits and advantages of this small site at Hartwood Road are reconsidered by West Lothian Council in light of the additional information submitted with this representation.
- 10.2 As a result, the site should be removed from its current countryside designation and allocated as a specific housing development opportunity with capacity for around 10 to 12 units in the LDP Proposed Plan.
- 10.3 This proposed allocation of our client's site in the new Local Development Plan would provide scope for a low density housing development in a suitable and accessible location. This would maximise the benefits and advantages of the site's location, and effectively "round-off" development in this particular area.
- 10.4 We trust the above comments will be taken into account in the preparation of the new LDP and we would welcome the opportunity to meet with the Council and its Planning Officers to review our client's proposals prior to the publication of the LDP Proposed Plan.
- 10.5 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.

JOHN HANDLEY ASSOCIATES LTD

Chartered Town Planning Consultants
1 St Colme Street
Edinburgh
EH3 8AA

t: 0131 220 8253
e: john.handley@johnhandley.co.uk

West Lothian Local Development Plan Main Issues Questionnaire

FOR OFFICIAL USE ONLY

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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>

Name	JOHN HANDLEY ASSOCIATES LTD	<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	1 ST COLME STREET EDINBURGH	
Postcode	EH3 6AA	
E-mail	john.handley@johnhandley.co.uk	
Telephone	0131 220 8253	

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?

Whilst we have reviewed the full MIR, and are aware of the range of separate Consultation Questions, this submission is restricted to matters relating to Main Issue 3 – Housing growth, delivery and sustainable housing locations, and Question 15 of the MIR Questionnaire. On behalf of the landowner, [REDACTED], we do not agree with the Preferred Strategy for housing growth in West Lothian insofar as it relates to West Calder and the non-allocation of land for residential development at Hartwood Road (MIR Site Ref: LATE-0009). On this basis, and in specific response to Questions 15, we would request that the particular merits and advantages of our client's site at Hartwood Road are reconsidered by the Council in light of the information set out in the attached Supporting Planning Statement which sets out our full representation on this matter. This site should be removed from its countryside designation and allocated as a new housing development opportunity with capacity for around 12 units in the new Local Development Plan.

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.

Please refer to attached Supporting Planning Statement for our full grounds of representation on Question 15.

WEST Lothian Local Development Plan Main Issues Report – Equalities opportunities questionnaire

We ask that you complete the following Equal Opportunities Questionnaire in order that we can build an accurate picture of the make-up and diversity of the people and groups that our policies impact on, and to ensure that the way in which we carry out our consultation is inclusive and not unwittingly discriminatory. If you are responding to this consultation, it would be helpful if you could complete the following questions.

1. Ethnic origin

How would you describe your ethnic or cultural origin?

- | | | | |
|--|--|---|---|
| <input checked="" type="checkbox"/> White Scottish | <input type="checkbox"/> White British | <input type="checkbox"/> White European / Other | <input type="checkbox"/> Black Scottish |
| <input type="checkbox"/> Black British | <input type="checkbox"/> Black African | <input type="checkbox"/> Black Caribbean | <input type="checkbox"/> Black Other |
| <input type="checkbox"/> Asian Scottish | <input type="checkbox"/> Asian British | <input type="checkbox"/> Indian Pakistani | <input type="checkbox"/> Chinese |
| <input type="checkbox"/> Other Asian | <input type="checkbox"/> Bangladeshi | <input type="checkbox"/> Mixed Race Origin | <input type="checkbox"/> Other |

2. Gender and age

- | | | | | |
|--|----------------------------------|---|----------------------------------|--------------------------------------|
| <input checked="" type="checkbox"/> Male | <input type="checkbox"/> Female | | | |
| <input type="checkbox"/> Under 25 | <input type="checkbox"/> 25 - 39 | <input checked="" type="checkbox"/> 40 - 54 | <input type="checkbox"/> 55 - 64 | <input type="checkbox"/> 65 and over |

3. Disability

Do you have a disability as defined by the Disability Discrimination Act 1995* (DDA)?

NB: The definition of a disability under the DDA is "a physical or mental impairment which has a substantial and long term adverse effect on a person's ability to carry out normal day to day activities".

- | | |
|------------------------------|--|
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
|------------------------------|--|

4. Discriminatory

Do you consider any sections in the *Main Issues Report Questionnaire* to be discriminatory in terms of age, disability, race religion or belief, gender or sexual orientation?

- | | |
|------------------------------|--|
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
|------------------------------|--|

If Yes, please detail which sections

Thank you for taking time to complete this questionnaire