

WLC REF: MIRQ0140

> Dear Sirs

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> This representation is submitted on behalf of CEMEX UK Properties Ltd and AWG Property Ltd in support of allocating land at Avontoun, Linlithgow for residential development in the West Lothian Local Development Plan Proposed Plan (WLLDP).

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> It supplements the previous submission made on behalf of the parties to West Lothian Council as part of its 'Call for Sites' exercise in advance of publishing the Main Issues Report (MIR).

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> The site falls within an Area of Great Landscape Value (AGLV) and incorporates the Site of the Battle of Linlithgow Bridge which appears in Historic Scotland's Inventory of Historic Battlefield(s). It also lies within a candidate Special Landscape Area which it is understood, if implemented, will simply replace the AGLV designation.

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> The attached site location plan graphically illustrates in very general conceptual terms, how a residential-led development could be accommodated on the subject land.

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> It should be noted that although the boundary of the overall site extends to approx. 42.5 hectares, only 2no. areas of the site extending to approx. 8.2 hectares (Phase I) and approx. 3.1 hectares (Phase II) are identified for development.

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> The remainder of the land outlined in blue, which is wholly within the control of CEMEX UK Ltd and AWG Property Ltd, would be the subject of a Community Management Plan with a focus on nature conservation and appropriate public access, as an integral part of any future proposals.

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> It is noted that Page 360 of the Environmental Report – Strategic Environmental Assessment (SEA) suggests that the site (WLLDP Ref E01-0054) could potentially accommodate up to 500no. units. This is incorrect.

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> Given that only just over 25% of the site is being proposed for future residential development, it is considered that a more realistic figure would be an absolute maximum of up to 200no. houses.

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> It is also noted that the proposed site has not been given 'preferred status' as a housing development proposal within the MIR, primarily on the basis that it falls within a designated AGLV and, built development at this location would constitute a physical and intrusive incursion into the countryside, beyond the limit of existing development. (Page 362 SEA)

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> It is against this background that the land at Avontoun, Linlithgow is presented for consideration and inclusion as a specific housing site within the emerging West Lothian Local Development Plan Proposed Plan.

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> At the outset, it is considered that the allocation of the site for housing purposes would be wholly consistent with Scottish Government objectives of delivering high quality, design-led residential environments in sustainable and accessible locations, all as articulated in Scottish Planning Policy June 2014.

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> The site also compares favourably with the criteria for assessing 'effectiveness' listed in Paragraph 55 of PAN2/2010: Affordable Housing and Housing Land Audits as follows:

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> · Ownership:

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> The site is within the ownership of landowners who are committed to releasing the site for development as proposed.

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> · Physical:

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> There are no known constraints such as slope aspect, flood risk (as informed by a preliminary assessment) or ground stability associated with the site. Furthermore, traffic consultants have advised that subject to detail, the site can be accessed of the adjoining road network via the A706 in a safe and satisfactory manner in accordance with the appropriate design standards.

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> · Contamination:

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> The site has no history of potential contamination land uses which would prejudice its ability to be developed for housing.

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> · Deficit Funding:

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> There is no requirement for any funding to be committed by public bodies to make residential development of the site economically viable.

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> · Marketability:

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> The site is located within a well established housing market area and can be developed and delivered within the plan period with confidence.

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> · Infrastructure:

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> In common with all other potential sites in Linlithgow, there are no known constraints in terms of waste water treatment and water supply, while education capacity will remain a constraint until such time as a new secondary school is built at Winchburgh (Page 150, MIR).

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> · Land Use:

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> Housing is the sole predominant use for the site.

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> Following the 'Call for Sites' exercise in 2012, West Lothian Council produced an 'Expression of Interest Report' which assessed each of the sites submitted for consideration. This report goes much further than the comments made regarding the site articulated on Pages 360, 361 and 362 of the Environmental Report (SEA).

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> In this regard, the Expression of Interest Report highlights a number of potential constraints that would require to be overcome if the site at Avontoun were to be supported for future development.

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> These can be summarised as follows:

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> · Loss of prime agricultural land (class 3.1);

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> · Archaeological issues on account of the site's status as forming part of the Site of the Battle of Linlithgow Bridge;

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> · Educational capacity issues;

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> · Flood risk on account of the close proximity of the River Avon, Cauld Burn and the Union Canal;

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> · Noise associated with the adjoining Brookfield Metals industrial site;

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> · Vehicular access;

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> · Ecology on account of badgers being recorded within the site by Scottish Natural Heritage (SNH);

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> · Visual impact on account of the site's location within an Area of Great Landscape Value (AGLV); and,

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> · To remote/detached from existing development and services, rendering it an unsuitable location for housing.

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> Loss of prime agricultural land is inevitable if the housing land allocations in the emerging Plan are to be achieved. In this regard, it is noted that the larger preferred housing sites being promoted by the Council in the MIR, all involve the loss of prime agricultural land.

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> With respect to the site's 'Battlefield' status, as a consequence of the site's previous mineral extraction history, the ground has been significantly disturbed. In this regard, Historic Scotland has advised that there is capacity for development on the site.

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> Despite its countryside designation in the Plan, given the site's previously developed history, it has in effect 'brownfield' status.

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> As highlighted on Page 150 of the MIR, all potential development site's in Linlithgow have educational capacity issues. This site is no different.

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> A preliminary flood risk assessment has concluded that the proposed development areas would have a low risk of flooding given the overall site's topography and the fact that the areas proposed for development are at a much higher level and distant from the potential sources of flood risk. Future development would also incorporate SUDS techniques to mitigate against the impact of the proposed development on flood risk elsewhere.

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> The potential noise nuisance from the adjoining Brookfield Metals industrial site is currently being considered by way of a noise assessment. This will be forwarded on completion. The early indications are that any noise nuisance can be appropriately mitigated.

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> With respect to vehicular access, it is considered that this can be safely provided off the A706 in conjunction with a reduced speed limit along the frontage of the site to 30mph, with a new town gateway feature introduced. Options are also available for accessing the site via Mill Road.

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> A preliminary ecological assessment has established that although there are badger setts in the area, they are very unlikely to be directly impacted upon by any future development on the proposed areas. Given the heavily tree'd nature of the site and its close proximity to the River Avon, there is potential for otters and bats. However, they would not be impacted upon by any future development as proposed. Further detailed ecological and habitat surveys will be carried out at the appropriate time of the year and submitted for consideration.

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> The proposed development sites are not physically or visually prominent and, given the strong landscape structure which characterises the site's boundaries, visual impacts will be minimal. Such aspects will be the subject of a detailed landscape impact assessment. It is further worth noting that AGLV and Special Landscape Area policies, do not preclude development in principle, but require a sensitive and considered design approach.

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> New development would not be too remote or detached from the existing settlement. In this regard, there is a leisure centre immediately opposite the proposed development sites, with proposals by the Linlithgow Community Development Trust to extend these facilities to create a multi-recreational use development which will also include buildings and areas of hardstanding. The proposed development areas also adjoin existing residential and have mutual boundaries with an established industrial site. Furthermore, both proposed development areas are only a short distance from the town centre and surrounding retail facilities and education provision.

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> To conclude, it is considered that the proposed sites could accommodate sensitively design-led housing developments which embraced the characteristics of the surrounding area, consistent with the sustainable design approach promoted by Scottish Government.

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> Furthermore, when assessed against the other larger sites which have initially been given preferred status by the Council, the proposed site compares favourably and is understood to be the only site in Linlithgow capable of providing a community land transfer benefit as proposed. In terms of benefit to the public, this gives the site at Avontoun a significant advantage.

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> Please acknowledge receipt in writing of this representation.

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> Kind regards

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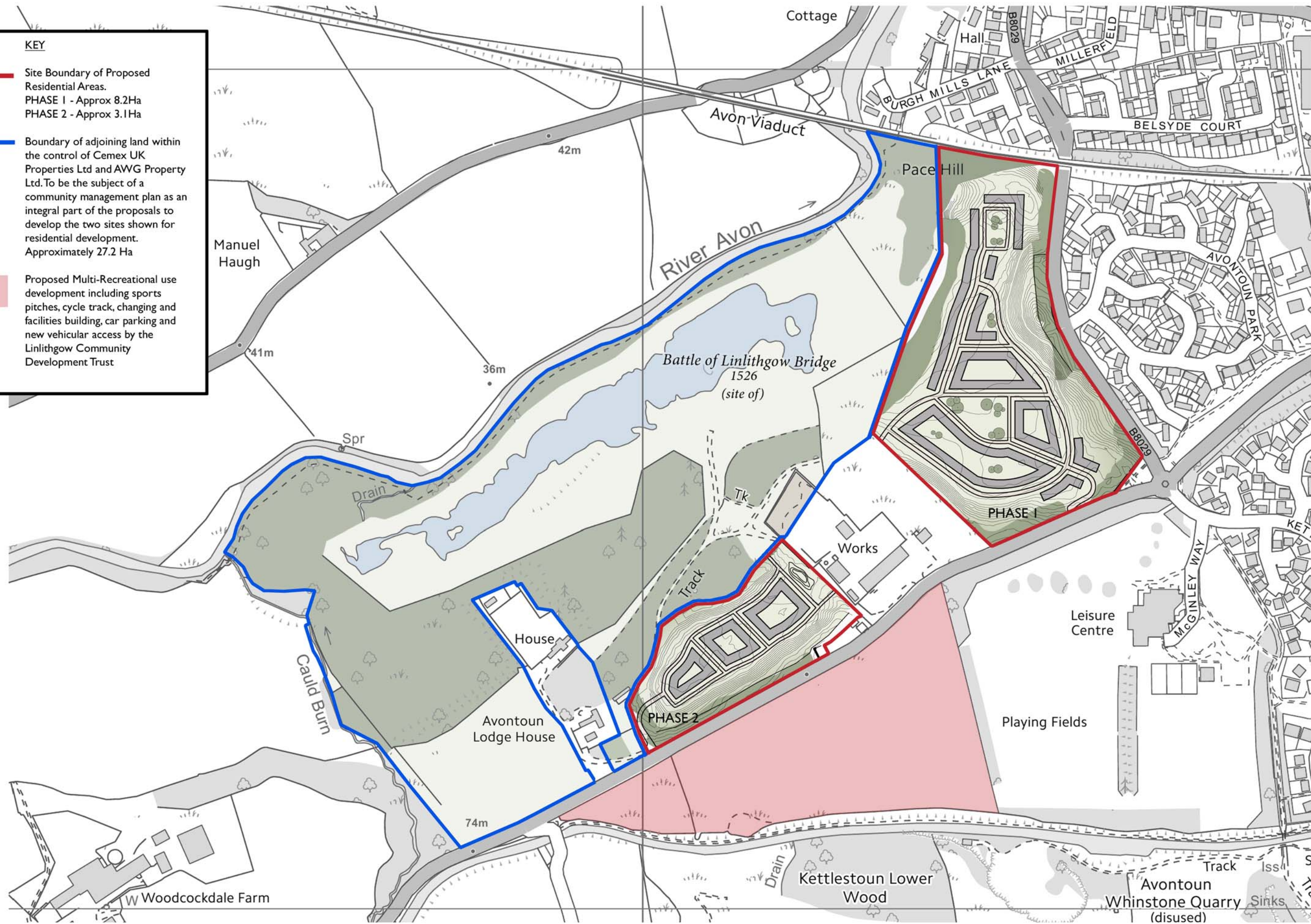
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KEY

- Site Boundary of Proposed Residential Areas.
PHASE 1 - Approx 8.2Ha
PHASE 2 - Approx 3.1Ha
- Boundary of adjoining land within the control of Cemex UK Properties Ltd and AWG Property Ltd. To be the subject of a community management plan as an integral part of the proposals to develop the two sites shown for residential development. Approximately 27.2 Ha
- Proposed Multi-Recreational use development including sports pitches, cycle track, changing and facilities building, car parking and new vehicular access by the Linlithgow Community Development Trust



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| project Avontoun, Linlithgow | job no E1440 | dwg no (SK)003 | revision - |
| client AWG Property Ltd / CEMEX UK Properties Ltd | status Site Location Plan | scale NTS@A3 | date 07.10.14 |
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