



Scottish Natural Heritage Dualchas Nàdair na h-Alba

All of nature for all of Scotland
Nàdar air fad airson Alba air fad

By email to: wlldp@westlothian.gov.uk

17 October 2014

Our ref: CPP132846 / A1428825

Dear Sir/Madam

West Lothian Local Development Plan - Main Issues Report (MIR)

Thank you for consulting us on the West Lothian Local Development Plan (LDP) Main Issues Report (MIR) and its accompanying Strategic Environmental Assessment (SEA). We have provided comments on the SEA and Habitats Regulations Appraisal (HRA) in our response of 15 October 2014 via the Scottish Government SEA Gateway.

We recognise your preferred means of comment is via the Questionnaire provided on your website. However, the formatting of the template would not allow us to comment in the detail we feel is required at this stage. Our detailed comments on MIR questions relevant to our remit are therefore appended in an Annex to this letter.

We look forward to working with you to ensure that the natural heritage of West Lothian is safeguarded and enhanced through the LDP and its related documents. If you would like to discuss our response further please contact our planning advisor Vivienne Gray (e: viv.gray@snh.gov.uk; t: 0131 316 2644) in the first instance.

Yours sincerely

[by email]

Niall Corbet
Operations Manager
Forth

Enc.



Annex – SNH response to MIR questions

Question 1 - Do you agree with the *vision for the LDP*, or, are there other aspects that should be considered?

West Lothian's position within the SESplan Strategic Development Plan (SDP) area offers an opportunity to take the higher level vision set out for the SDP area and add local context. While the vision for the LDP is fairly lengthy, it sets an aspiration for how growth in the area will take place. In terms of our remit, we welcome the reference to a '*network of green spaces*' and the aspiration to protect and improve the natural heritage. However, we would suggest that the vision perhaps needs to be updated to better reflect the National Planning Framework (NPF3) and Scottish Planning Policy (SPP) content, in particular the vision these documents set out for green infrastructure.

Question 3 - Do you agree with the proposed 'Aims' of the LDP? If not, why not?

We agree in general with the Aims of the LDP but suggest some minor changes as follows:

- In reference to SPP's principal place-making policy, we recommend that the aims of Main Issue 3 (Housing Growth, Delivery and Sustainable Housing Locations) are expanded to include quality of place. The statement in paragraph 2.15 of the MIR that "*Development must be harnessed to enhance the sense of place in communities through high quality, low carbon design.*" highlights the importance of place-making to the LDP and delivery of sustainable growth in West Lothian.
- The MIR sets out a robust approach to sustainable and active travel throughout, which aligns well with the SPP and *Designing Streets*. Support for modal shift appears to be a key aim of the MIR (for example paragraph 2.14 of the spatial strategy) and it is therefore surprising that it is not included more explicitly in the Aims. References could be strengthened under Main Issue 4 (Infrastructure Requirements and Delivery) and Main Issue 7 (Climate Change and Renewable Energy).

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?

We do not believe we have the relevant range of expertise to comment on the broader range of uses proposed but note that a flexible approach must nevertheless seek to work with existing resources on site and enhance/restore these as far as possible.

SPP 2014 – Supporting Business and Employment:

We recognise that in continuing to support existing employment allocations, the LDP is bringing forward sites which have already been through consultation and which have been tested at Inquiry. However, the LDP must also consider sites in relation to the new SPP. For example, in relation to economic allocation EOI-0013 (CDA-AN) we consider that it might be difficult to achieve development which meets the requirement set out in SPP paragraph 93 to: '*...promote business and industrial development that increases economic activity while safeguarding and enhancing the natural and built environments*'. Currently this is a greenfield site, with strong rural character, offering panoramic views to the Pentland Hills and Five Sisters from the A705. It part forms Livingston's landscape setting, which largely hidden in views on approach from the west. The site has a relatively detached relationship to the

existing urban area.

Vion, Broxburn:

We note that the former Vion site in Broxburn (PJ-008) is to be allocated for mixed use development rather than continuing its previous single use as an economic site. This preferred use appears more likely to support opportunities to:

- Improve the setting of this part of Broxburn along the A89 road;
- Plan for development which retains the vista to the Pentland Hills; and
- Establish more direct links between the footpath/cyclepath along the A89, Broxburn Main Street and the Union Canal by making connections through the site.

Given the Vion site's status as an Enterprise Area in NPF3, we consider that quality of place should be a key determinant of development and recommend that the site brief is based on a design-led approach which encompasses the above requirements.

Question 6 - Do you agree with the 'Alternative' approach to employment land?

We note the stated likelihood that the alternative approach would lead to large employment estates located in non-sustainable, greenfield locations. With regard to this, please refer to our comments above on allocation EOI-0013, as an example of where we currently have concerns.

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?

The Linhouse site (ELv54/EOI-0099) appears well-contained, largely due to the existing woodland around the site. It sits within close proximity to both existing housing in the east of Murieston and to existing business/industrial development at Oakbank. If the site is to be sub-divided we recommend that the balance of uses reflects this existing situation, with housing sited to benefit from proximity of existing green infrastructure, such as the surrounding woodland, as well as the extensive path network which runs around this site. Regardless of use, the existing woodland around the site should be retained, with appropriate development stand-off and links to the woodland paths included in site requirements. This information could usefully be captured in a site brief.

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?

We do not believe we have the relevant range of expertise to comment on the appropriateness of a broader range of uses but note that a flexible approach must nevertheless seek to work with existing resources on site and enhance/restore these as far as possible.

Question 11 - Do you agree that a site at Balgornie Farm, north of Whitburn, should be allocated for strategic employment land purposes?

If not, why not?

What other locations would you suggest?

The site at Balgornie Farm is largely flat, rising to a ridge which separates Whitburn from Armadale. As currently shown, the allocation appears to be on the lower area and is therefore unlikely to break this slope. At present the general character of the site and its surrounds is rural, with little hint of the presence of the Heartlands Industrial Estate on approach from the east on the A706. Approaching from the north on the B8084 Whitburn appears generally low-lying within a context of woodlands and shelterbelts. The site's position adjacent to the M8 and other development at the Heartlands Industrial Estate appears to accord well with the general principles of accessibility to strategic networks set out in the MIR.

Whitburn is largely set back from the M8 and/or screened by planting. If allocated, we recommend that similar principles should be set out in the site requirements. Alongside the generally low-lying nature of the site, maintaining a setback and screening the site through appropriate new planting will likely help to mitigate the change in character of what is currently a rural area.

Question 15 - Do you agree with the 'Preferred' strategy for housing growth in West Lothian?

If not, why not?

While we appreciate the opportunity to comment, our area of expertise is more relevant to other stages of plan preparation out with technical assessment of the housing market, when we expect to work collaboratively on the details and issues of 'where' and 'how' housing should be delivered in the Plan area rather than how the amount of housing that is required is calculated. We will provide advice on these points under the relevant MIR questions.

Question 20 - Do you agree with the 'Preferred' option for the removal of existing housing allocations from the development plan?

If not, why not?

As noted above under Question 15, our area of expertise is limited to particular aspects of delivery of housing. Therefore, in considering the preferred and alternative approaches set out in the MIR we have referred to the criteria set out in paragraph 55 of *PAN 2/2010* and have focused on the 'physical' and 'infrastructure' criteria of housing land audits. In this respect we note the following:

- Paragraph 110 of SPP sets out policy principles for enabling delivery of new homes. These include contributing to the creation of successful and sustainable places. As noted at paragraph 3.68 of the MIR, past developments have been criticised for their failure to respond satisfactorily to the context of the site. Your Supplementary Guidance on *Residential Development* (2013) should be a key document in influencing how a development should respond to place. We would suggest that, despite only recently having been adopted, it seems likely that this Supplementary Guidance should be reviewed to ensure good alignment to any relevant the changes in the new SPP, such as the greater emphasis on placemaking and the need for a design-led approach at all stages (paragraph 38 and 39).
- The natural heritage has a clear role to play in informing both carried forward and new allocations in the development plan. In particular, we would expect the site proposals to be influenced by landscape character and place-specific green infrastructure opportunities.

We have provided comments on sites with such issues and opportunities in mind. Please note that our comments at this point are restricted to sites which either have questions associated with them in the MIR or which we consider offer the most significant opportunities for the natural heritage. However, due to time constraints

our comments are not made with the benefit of a full site visit and we would not wish them to prejudice any further representation that we may make. As we have previously provided comments in the 'call for sites' consultations we ask you to refer to those for all other sites. We wish to continue to work closely with you if you are considering changing preferred, alternative and unsupported sites. Our experience so far suggests that meeting with relevant stakeholders is the most productive way to explore changes and refine content as the plan emerges.

Question 21 - Do you agree with the 'Alternative' option' for the removal of existing housing allocations from the development plan?

If not, why not?

Please see our response to [Question 20](#).

Question 23 - Do you agree with the 'Preferred' approach to the core development areas?

If not, why not?

We agree with the intention to continue supporting delivery within the Core Development Areas (CDAs). We note a number of preferred sites or extensions to sites located, not just at Winchburgh (as stated in the preferred approach), but also at East Broxburn. We have set out specific comments in relation to these areas below.

Winchburgh:

We presume the preferred approach to allocate further land at Winchburgh refers to [EOI-0193](#). We are concerned that if allocation [EOI-0193](#) is included in this local development plan it may lead to earlier development of an area which is currently perceptually, visually and physically detached from Winchburgh. It isn't clear from the MIR content how this site would be integrated into the overall masterplan for the Winchburgh CDA; issues to address in an updated master plan are set out below:

- Landscape setting, in particular the site's relationship to the unclassified road immediately to the south, and the need to maintain distinct settlement identities for Winchburgh and Faucheldean (MIR paragraph 3.65).
- Phasing - Delivery of the phases at Glendevon prior to development of [EOI-0193](#) would reduce the detachment of [EOI-0193](#).
- Without inclusion in an updated master plan for Winchburgh, we consider it unlikely that conditions could reasonably be imposed on any permission for this site which would restrict it to this sequence, in the event that an earlier application was to be made.

East Broxburn and its relationship to Uphall and Faucheldean:

We recognise some of the preferred sites to the north of Broxburn are currently allocated as part of the existing CDA. However, we also note that [EOI-01386c, d, e and f](#) are preferred extensions to the CDA, but '*no increase in site capacity*' has been set out (MIR page 135); we are unclear what is meant by this. We also note a number of preferred sites immediately north of Broxburn and Uphall: Kirkhill North ([EOI-0086, 0087, 0143, 0144](#), preferred in part), plus reasonable alternatives: [EOI-0138a](#) and Forkneuk East [EOI-0017 \(east\)](#).

We are concerned about the pressure for development creep to the north of Uphall and Broxburn into an area that defines the landscape setting for Uphall and Broxburn and provides an important role in preventing coalescence with Ecclesmachan and Faucheldean and maintaining distinct settlement identities (MIR paragraph 3.37 and

3.65). We consider that capacity, including the type and scale of development, would best be explored in more detail through the preparation of a development framework covering north Uphall and Broxburn, clearly establishing their relationship within their wider landscape setting. We would welcome involvement in this process. We highlight below our initial views of what should be considered:

- Topography and Character – the need to respond to local topography and landscape character, in particular Uphall and Broxburn’s setting which provides a transition from a strongly rural landscape to a rich post-industrial landscape; and the need to establish a defensible boundary.
- Views to and from – retain vistas to key landmarks such as Greendykes Bing, the Pentland Hills, Edinburgh, and the Forth Bridges, and consider the highly visible nature of the parts of the area in developing proposals.
- Gateways – retain the strong rural character on approach to Uphall and Broxburn from the north.
- Existing landscape features (for example the community woodland and path network, the Union Canal, Greendykes Bing, Belvedere policy landscape remnants) and the opportunities to integrate these into development proposals and develop a multi-functional green network – appropriate requirements that respond to the local character should be explored.
- Bings – how development proposals should respond to the setting of the Faucheldean and Greendykes Bings as key landscape features; including the need for a management plan which covers habitat and recreational interests.
- Access – the need for pedestrian and cycle-friendly routes which successfully connect and integrate sites and create walkable and cycle-able links to key destinations, local centres and the wider active travel network; access to the wider countryside.
- Roads – further consideration of road access in particular the need to respond sensitively to landscape setting and character.

Question 24 - Do you agree with the ‘Alternative’ approach to the core development areas?

If not, why not?

Refer to our answer under [Question 23](#).

Question 26 - Do you agree with the ‘Preferred’ approach to Heartlands, Whitburn? If not, why not?

We have set out comments in relation to [EOI-0001](#) below, which should be considered if you decide to progress with the preferred approach. Casework for this area suggests that the southern part of this allocation (open space) at least in part hosts deep peat. In addition, the landscape is high, open and exposed, which we consider will limit what is acceptable and achievable with respect to the objectives you have set out in the MIR. The need for the following should be taken into account:

- A site survey to establish/confirm peat resource and inform management.
- The site’s wider landscape and recreational role: as accessible countryside, including existing dismantled railways and forest tracks.
- Water voles were present at Heartlands; therefore development/habitat creation along watercourses should be managed appropriately. Principles for watercourse management established during Heartlands reclamation and formation of existing

golf course likely to be appropriate here also.

Question 29 part 1 - Should the definition of Linlithgow as an 'area of restraint' be removed, and if so, how should the town be developed in the future?

There are a number of factors influencing the 'area of restraint' which are outwith our remit and we can therefore only offer comment in relation to the first principle of restraint at paragraph 3.82 of the MIR: '*the desire to preserve Linlithgow's small scale character and to safeguard its attractive landscape setting.*'

We note that preferred sites [EOI-0210](#), [EOI-0045](#) and [EOI-0168](#) are located within the boundary of the Bathgate Hills candidate Special Landscape Area (cSLA). This designation reflects the sensitivity of Linlithgow's landscape setting and the need for careful scrutiny of these sites. Whilst there might be some capacity for development in this area, this is likely to be limited and would need to be carefully masterplanned in relation to management recommendations in the Bathgate Hills Statement of Importance.

We consider that capacity, including the type and scale of development, would best be explored in more detail through the preparation of a development framework for Linlithgow, which should also consider [EOI-0114](#). We would welcome involvement in this process. We highlight below our initial views of what should be considered:

- Topography – the need to respond to local topography, in particular the Linlithgow's setting within a 'bowl'. Views to the southern ridgeline from Linlithgow and the Bathgate Hills should be carefully considered to maintain character of the area and create a defensible boundary to Linlithgow. Consider retaining open space, for example on the ridgeline and at Pilgrim's Hill, to maintain their important role in Linlithgow's setting.
- Gateways – retain the strong rural character on approach to Linlithgow from the east along the B9080 and south along the unclassified road.
- Views – retain vistas to key landmarks such as St Michael's Kirk and Airngarth Hill.
- Existing landscape features and the opportunities to integrate these into development proposals and develop a multi-functional green network.
- Canal – appropriate requirements (informed by the canal's Scheduled Monument status) to retain/create publicly accessible open space along the canal, including an active development frontage.
- Access – the need for pedestrian and cycle-friendly canal, railway and road crossings; walkable links to the town centre, including along the canal towpath; and access to the Bathgate Hills.
- Roads – further consideration of road access in particular the need to respond to the sensitivity of Linlithgow's landscape setting, taking account of the SEA conclusion that access could be problematic for some sites, in particular [EOI-0210](#). Access to [EOI-0114](#) also appears constrained.

Our comments above relate to the issues and opportunities these sites present to landscape setting and character. Our other interest in changes to development in Linlithgow relates to Linlithgow Loch Site of Special Scientific Interest (SSSI), which is designated as the largest example of a eutrophic loch in the Lothians. With a relatively small but intensely used catchment, this site is vulnerable to further changes and pressures and it is essential that the effect of development, and opportunities to mitigate, are considered at time of allocating sites for the LDP. Our main concern in this respect is that additions to combined sewer overflows (CSOs) will exacerbate the effects of eutrophication in the SSSI. As you will be aware, there

is a well-documented history of increasing eutrophication and algal blooms on the loch which are associated with nutrient inputs from the catchment. We understand that a joint research project is underway which will look at using the Union Canal to attenuate discharge from developments around Linlithgow. If viable, this may address the potential impact of these developments.

Question 29 part 2 - Should a sequential approach be applied to the release of land in and around Linlithgow to accommodate any new development?

When considered in relation to landscape and active travel, the sequential approach proposed at paragraph 3.93 of the MIR accords with paragraphs 40 (sustainable patterns of development), 110 (successful, sustainable places) and 287 (sustainable transport) of SPP.

A development framework for Linlithgow (as suggested in part 1 of this question) would offer the best means to capture decisions on the sequential approach and phasing of delivery.

Question 32 - Do you agree with the 'Preferred' approach for addressing the Deans South estate?

If not, why not?

The Deans South comprehensive re-development area benefits from existing paths within and through the site, as well as proximity to the Livingston North rail station. In these respects, the site's location and existing infrastructure accord well with the MIR's strong sustainability principle and provide a strong basis for a design-led and place-based approach in the redevelopment area.

Question 42 - Do you agree with the 'Preferred' approach to promoting access to/from/within West Lothian?

If not, why not?

The preferred approach proposes what would be a balanced shift towards more sustainable transport – addressing existing and potential road constraints while promoting and securing alternatives to travel by private car. Our main interest in access is active travel and recreation and the role that multi-functional green networks can have in supporting both of these activities. In this respect, we welcome the preferred approach of development in locations that support active travel and safe walking and cycling routes (paragraphs 3.142 – 3.144 of the MIR).

Paragraph 3.135 of the MIR discusses provision of a '*safe and convenient environment for walking and cycling*'. This reflects the policy principles set out in paragraph 270 of SPP and *Designing Streets*. We believe that an additional aspect of providing a successful active travel network is embedded in the principles of the design-led approach which emphasises development that is safe and pleasant, welcoming and easy to move around and beyond (paragraphs 42, 43 and 46 of SPP), which could perhaps be more strongly reflected. These aspects can be delivered via a multi-functional green network based on securing multiple benefits which respond to the site's existing landscape features and situation.

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?

Paragraphs 3.137 and 3.138 of the MIR prioritise efficiency and sustainability, an approach which the provision of a new rail station at Winchburgh would seem to support. The existing Winchburgh master plan includes a green network based active travel network which would support cycling and walking to a new station.

Question 45 - Do you agree that the 'Preferred' approach to town centres and retail provision in West Lothian is appropriate?

If not, why not?

We welcome the recognition of the role green networks play in West Lothian's network of town centres, as discussed at paragraph 3.164 of the MIR. While it is not specifically mentioned in this section, there is clearly a strong relationship between the approach to town centres and the preferred strategy of local transport routes and hubs for walking and cycling.

Picking up on the vision set out in NPF3, we would also highlight the potential benefits of retrofitting green infrastructure elements in town centres might also help in improving future resilience and quality of place.

Question 48 - Do you agree with the 'Preferred' approach to the natural environment in West Lothian?

If not, why not?

The emerging approach in the MIR appears to be a hybrid of both the preferred and reasonable alternative approaches. The allocation of sites [EOI-0045](#), [EOI-0210](#) and [EOI-0168](#) at Linlithgow and [PJ-0006](#) at Dechmont will require parts of the Bathgate Hills cSLA to be released for housing.

Question 49 - Do you agree with the 'Alternative' approach to the natural environment in West Lothian?

If not, why not?

Please see our response to [Question 48](#).

Question 51 - Do you agree with the 'Preferred' approach to landscape designations in West Lothian?

If not, why not?

We support the preferred approach to simplify and consolidate existing landscape designations as informed by the *West Lothian Local Landscape Designation Review* (LLDR) (LUC, 2013). However, we note that the emerging approach in the MIR includes preferred sites which lie within the boundary identified through the LLDR for the Bathgate Hills cSLA. We would be happy to discuss this issue in further detail, please also see our answer to [Question 29](#).

Question 52 - Do you agree with the 'Alternative' approach to landscape designations in West Lothian?

If not, why not?

Please see our answer to [Question 51](#).

Question 60 - Do you agree with the 'Preferred' approach to the green network in West Lothian?

If not, why not?

We welcome the commitment to identify and define the existing multi-functional green network resource and to map and safeguard this resource in the LDP, along with identifying opportunities for future priorities and key proposals for enhancement. We agree that 'All development sites, as part of the preferred development strategy, could allow opportunities for the integration of new green infrastructure' and that 'linking with the council's Open Space Strategy and Core Paths Plan' (paragraph 3.187). We support 'the inclusion of SUDS, swales, wetlands, rivers and canals and their banks and other water courses as part of green networks' (paragraph 3.187).

At this point it is difficult for us to give more specific comments as maps of the existing green network and the green network opportunities (identified in the background paper) are not available. Paragraph 3.187 of the MIR notes that more detailed work on the green network will be completed for the LDP – we would be happy to input to this work and share experience gained through our work with other authorities on green networks and green infrastructure issues.

Question 61 - Does the proposed West Lothian wide green network capture the best strategic opportunities or are there any missing links?

As discussed above, it is difficult to comment on whether strategic opportunities have been captured in the absence of the green network maps.

We will provide further comment on strategic opportunities when further information is available.

Question 62 - Do you have any suggestions for a green network across West Lothian?

Please see our response to [Question 60](#).

Question 63 - Do you agree with the 'Alternative' approach to the green network in West Lothian?

If not, why not?

As noted in the MIR, the alternative approach would not help West Lothian deliver on the wider focus of CSGN and we therefore do not support this approach.

Question 65 - What are your views on the proposed extension to the Pentland Hills Regional Park in West Lothian?

In our response to the consultation on the proposed extension of the Pentland Hills Regional Park we supported the proposal as it could:

- extend the places managed for people and nature;
- allow for greater appreciation and enjoyment of the natural heritage;
- provide increased recreational opportunities and integrated land management;
- increase landscape protection and enhancement; and
- provide more opportunities for rural economic development based on nature and recreation.

In terms of the extent of the extension, our advice was that the natural heritage could inform the objectives for the extension, including definition of detailed boundaries. This includes landscape character types and relative wildness. Overall, the proposed extension provides an opportunity to review the current boundary which reflects administrative boundaries rather than landscape and geological integrity.

Further detail of our views on the proposed extension is available in our response Scottish Parliament of 23 May 2014.

Question 66 - Do you have any general or specific issues with the proposed list of Local Biodiversity Sites and Local Geodiversity Sites?

As a partner in the review group we have had the opportunity over the last few years to input to the selection of Local Biodiversity and Geodiversity Sites. Any general or specific issues were raised through that process.

Question 67 - Do you agree with the 'Preferred' approach to Biodiversity and

Geodiversity in West Lothian?

If not, why not?

We support the preferred approach.

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?

The Open Space Strategy will be important in identifying existing open space assets to be protected, as well as future open space needs and opportunities. As set out in paragraph 222 of the SPP, and recognised in the preferred approach to green networks as set out in the MIR, the Open Space Strategy will be important in identifying existing green networks, particularly at the settlement level. The green network opportunities listed in the background paper should be explored further through the process to update the Open Space Strategy and reflected as appropriate in the final Open Space Strategy as a key evidence base.

The Open Space Strategy should provide a basis to identify open space standards covering accessibility, quality and quantity, providing an important basis to identify appropriate developer requirements for open space (and green infrastructure) both on- and off-site, thus helping deliver the intention set out in paragraph 3.187 of the MIR that *'All development sites, as part of the preferred development strategy, could allow opportunities for the integration of new green infrastructure'*. Our recent e-resource on open space strategies might be helpful: <http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/greenspace-and-outdoor-access/open-space-audit-and-strategies/eresource/>

Question 74 - Is the 'Preferred' approach to Bangour Village Hospital appropriate? If not, why not?

The site at Bangour Village Hospital (HBn1 / EOI-0034) is an existing allocation which benefits from the built and natural heritage assets of this long-established site. We support the proposed preparation of a detailed master plan and suggest that, if the adjacent proposed site PJ-0006 is allocated, site briefs covering both sites and their relationship to one another, should be prepared.

We note that preferred site PJ-0006 is located within the boundary of the Bathgate Hills candidate Special Landscape Area (cSLA). This designation reflects the sensitivity of the landscape setting and the need for careful scrutiny of these sites. Whilst there might be some capacity for development in PJ-0006, this is likely to be limited and would need to be carefully master planned in relation to management recommendations in the Bathgate Hills Statement of Importance. We would welcome involvement in this process. We highlight below our initial views of what should be considered:

- Topography – the need to respond to local topography, in particular Dechmont's setting on the edge of the Bathgate Hills and the need to establish a defensible boundary.
- Gateways – retain the strong rural character on approach to Dechmont from the north and east.
- Existing landscape features and the opportunities to integrate these into development proposals and develop a multi-functional green network, in particular existing shelterbelts, shared policy woodland and the Brox Burn – appropriate requirements to retain/create publicly accessible open space along the burn as an important green network, including an active

development frontage should be explored.

- Access – the need for pedestrian and cycle-friendly routes which successfully connect and integrate both sites; walkable links to the village centre; access to the Bathgate Hills.

Question 80 - Is the 'Preferred' approach to the Union Canal appropriate?

If not, why not?

We agree that sections of the Union Canal which are 'quiet' at present should be protected, particularly for their role in the wider setting of the canal and adjacent settlements and the experience of users. The Reporters comments from examination of the current Local Plan suggest that the canal forms an important defensible boundary to Winchburgh and Broxburn. The scale of change around both of these settlements in the respective Core Development Areas reinforces the importance of this role and we recommend that this section is retained as such.

Please also see our comments in relation to the Canal and preferred sites under Questions 23 for Broxburn and 29 for Linlithgow.

Question 81 - Do you agree with the 'Alternative' approach to the Union Canal?

If not, why not?

While we consider it important that the rural section of the Union Canal between Winchburgh and Broxburn is retained, we do not support a general approach of no development along the canal. This approach seems unlikely to be beneficial to either the canal or adjacent settlements. This can be seen through the effects of the Millennium project, which helped restore some purpose to the canal and brought users back to it. Balanced development as set out in preferred approach seems likely to continue/secure this purpose.

Please also see our comments in relation to the Canal and preferred sites under Questions 23 for Broxburn and 29 for Linlithgow.

Question 86 - Do you agree with the 'Preferred' approach to renewable energy?

If not, why not?

Paragraphs 3.223 and 3.224 of the MIR set out the requirements of SPP for spatial frameworks at the same time as noting that potential for wind farms in excess of 20MW is likely to be very limited. We recommend that a spatial framework for West Lothian, as set out in Table 1 of SPP, is prepared prior to reviewing the policy framework for wind energy.

Question 87 - Do you agree with the 'Alternative' approach to renewable energy?

If not, why not?

The 'Alternative' approach does not accord with SPP and we therefore do not support this approach.

Question 94 - Do you agree with the 'Preferred' approach to mineral extraction?

If not, why not?

The areas identified as areas of search for coal extraction in paragraph 3.236 of the MIR are likely to lead to impacts on peat and priority peatland habitats and may have landscape and visual impacts that would arise both during working and upon proposed restoration.

In relation to the proposed strategy for open cast coal we suggest that there may be challenging issues for protection and enhancement of the natural heritage in these locations. We would advise that if they are taken forward in the LDP, policy wording

should ensure that suitable protection and restoration of peatland and landscape assets is delivered through development management processes.

Given the potential natural heritage impacts of unconventional gas exploration, as discussed at paragraph 3.242 of the MIR, we strongly recommend that a clear policy framework is established in the LDP, should developer interest become more firmly established in the area at a future date.

We suggest that any new or future onshore gas policy should address the following issues:

- Landscape and visual impacts, including cumulative and night-time assessment; and
- Ecological impacts, particularly groundwater dependent terrestrial ecosystems (GWDTE).

Question 95 - Do you agree with the 'Alternative' approach to mineral extraction?

If not, why not?

Please see our response to [Question 94](#).