

West Lothian Main Issues Report Development Strategy for Linlithgow



Introduction

The Council's preferred development strategy in the Main Issues Report (MIR) is to re-consider the 'area of restraint' and seek the release of further greenfield land for housing, employment and tourism related development.

10 sites are identified as preferred sites in the Main Issues Report (MIR) with a total capacity of 582 homes. The majority of this proposed development is located in the south of the town beyond the railway line.

West Lothian has suffered during the economic recession – losing many jobs and fewer homes being built. The Council has been and is continuing to take action to stimulate recovery. Wallace Land wishes to work with the Council to assist with this economic recovery.

Question 29

Should the Linlithgow *area of restraint* be removed, and if so, how should the town be developed in the future?

The area of restraint in Linlithgow was imposed by the Edinburgh and Lothians Structure Plan. The reasons for the imposition of the area of restraint are ...infrastructure, landscape and environmental objectives.

The Edinburgh and the Lothians Structure Plan has now been replaced by SESplan Strategic Development Plan (SDP).

The LDP needs to comply with the development strategy approved in SESplan. This strategic development strategy encourages sustainable development within the West Lothian Strategic Development Area (SDA). Linlithgow is part of this SDA. SESplan paragraph 90 requires that new allocations in the West Lothian LDP ...will be focused in sustainable locations where infrastructure is either available or can be provided and in locations where there are no environmental constraints.

Wallace Land supports further greenfield development and has submitted proposals for development at Burghmuir on the eastern edge of Linlithgow. The proposal for Burghmuir now excludes a foodstore.

A comprehensive assessment about the proposal to expand Linlithgow at Burghmuir was submitted at the Expressions of Interest stage (EOI-0103) as two sites. This assessment confirms that a major town expansion at Burghmuir of up to 600 homes with hotel, care home and serviced sites for health centre and community sports area can be accommodated within the known environmental and infrastructure capacity in Linlithgow.

This information provided to the Council by Wallace Land confirms that there is environmental and infrastructure capacity in the town to accommodate the scale of development proposed in the MIR. However, the case presented is that a future development strategy for Linlithgow needs to be focussed in the east where there is ample school capacity and impacts from additional car journeys from this scale of development will be mitigated by the provision of the motorway slips.

More homes in this eastern location has been consistently supported by the local community – for example, the Civic Trust's aspirational plans for development at Burghmuir as set out in the *Vision for Linlithgow 2010-2030*.

Environmental capacity

Supporting studies commissioned by Wallace Land explain how air quality issues in the town centre can be addressed and improved with the provision of new motorway slips. These slips can only be delivered by Wallace



Land, as Wallace Land controls the land required to deliver both slips including the approved slip within Falkirk Council's administrative area. Wallace Land's supporting statement *Delivery of the M9 Slip Roads* sets out the benefits to the town of delivering these slips.

Transport Infrastructure Capacity

Allocating Burghmuir as a preferred site for up to 600 homes, with care home, hotel and serviced sites for a new health centre and a community sports area will deliver the motorway slips. This key mitigation will reduce traffic congestion in the High Street and with it, improve air quality. There are significant transport and environmental benefits in allocating the site. None of the other Preferred Sites in the MIR can deliver this mitigation.

None of the submissions for Linlithgow to the Expressions of Interest stage of the LDP have factored the costs of the motorway slips into their development viability assessments.

The only solution is therefore the allocation of Burghmuir in the Proposed Plan.

Education Capacity for Burghmuir

Education capacity exists in Linlithgow but only in the east of the town. SESplan sets the strategic guidance in the location of new allocations in the LDP. This should be to locations with existing infrastructure capacity. In the case of Linlithgow, it is education capacity in the town's primary schools that sets the preferred locations for future development.

Burghmuir is mainly located in a primary school catchment area (Springfield Primary School) which has surplus capacity. This School can accommodate the scale of housing proposed in the MIR at 580 homes with an extension. This has already been agreed with the Council. The Council has already confirmed that pupils from the northern part of Burghmuir (which is within the catchment of Low Port Primary School) could be accommodated at Springfield Primary School.

Paragraph 3.88 of the MIR states that ...significant spare capacity is also available at Springfield Primary school where the school roll is in decline. This is not the case for the other primary schools in the town which will serve the Preferred Sites.

The proposed development strategy in the MIR allocates 433 homes in the catchment of Low Port Primary School which is already over capacity.

The proposed development strategy in the MIR allocates 44 homes in the catchment of Linlithgow Bridge Primary School which is already over capacity.

The proposed development strategy in the MIR allocates 81 homes in the catchment of Linlithgow Primary School which is already at capacity.

It is known that there are significant difficulties in providing extensions to these three primary schools. There is no guarantee that a catchment area review would be supported by the local community and be successful in redistributing pupils from these schools to Springfield Primary School especially given its location on the east side of the town.

All of this demonstrates that the proposed development strategy set out in the MIR is contrary to SESplan.

There is existing pupil capacity at Linlithgow Academy for the scale of development promoted in the MIR. Wallace Land commissioned an Education Impact Assessment and this Assessment concluded that there is capacity for Burghmuir to proceed alongside the approved development at Winchburgh CDA without breaching capacity at Linlithgow Academy. A new secondary school must be delivered at Winchburgh prior to the occupation of the 551st home at Winchburgh. This is programmed for 2018/19.



Delivery of the new school at Winchburgh will release further education capacity in Linlithgow beyond the 580 homes promoted in the MIR.

Pupils from Burghmuir can be accommodated in all of Linlithgow's schools and protect the on-going interests at Winchburgh. The financial contribution of £4.5M from developing at Burghmuir is a major cash injection to the Council and will help deliver the new secondary school in Winchburgh as well as extensions to the primary schools.

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

Wallace Land does not agree that a sequential approach should be applied to the release of land in and around Linlithgow.

The following analysis confirms that Linlithgow should be subject to a major expansion in the east because of the availability of education infrastructure and the ability of Wallace Land to deliver the motorway slips. This approach of prioritising the release of land in the east is in accord with SESplan.

This means that the Council should identify land in areas where there is existing primary school education capacity. Springfield Primary School is the only primary school in Linlithgow with available pupil capacity in the Local Plan period to 2024.

The Council should also seek to identify sites that can deliver mitigation measures to address wider environmental and transport infrastructure ie the motorway slips. This would resolve the impending designation of an Air Quality Management Area in the town centre.

Allocation of 600 homes at Burghmuir can be accommodated within existing education infrastructure, and crucially will deliver the transport infrastructure necessary to relieve town centre congestion and improve town centre air quality. The site is effective in accord with PAN 2/2010. Allocation of Burghmuir is in accord with the strategic guidance set out in SESplan.

Critique of the Council's preferred development strategy outlined in the MIR

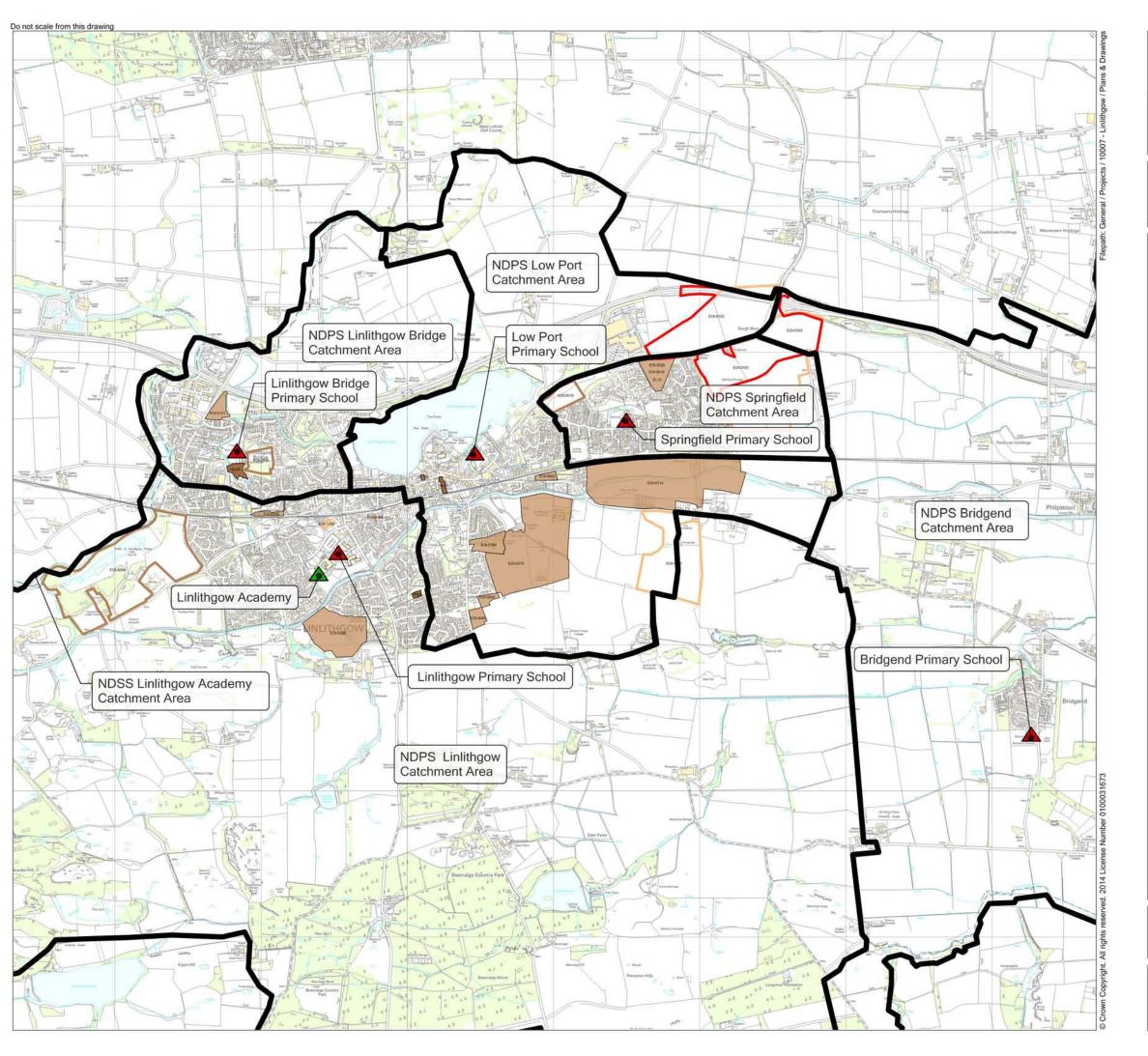
10 new housing sites are identified as Preferred Sites in the Main Issues Report (MIR) with a total capacity of 582 homes. The majority of this proposed development is located in the south of the town beyond the railway line.

The MIR also identifies three committed sites that are being carried forward as allocations from the current Local Plan.

The Council's Local Housing Strategy 2012-2017 has identified Linlithgow as an area of high demand for affordable housing and a Priority 1 area for investment. The MIR confirms in paragraph 3.86 that ...significant provision of affordable housing in the town can only be provided if there is a release of greenfield land which may inevitably involve building on prime quality agricultural land.

The location of the preferred sites identified by the Council in the MIR fails to address the very reasons for the designation of an 'area of restraint'. The attached plan illustrates the location of the Preferred Sites along with the Linlithgow non-denominational school catchment areas.

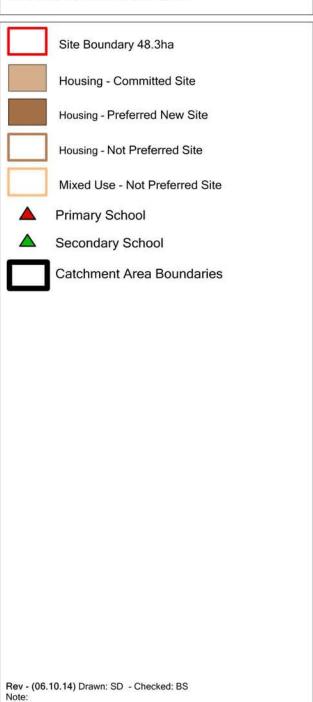
The attached plan confirms that the majority of the sites identified by the Council are in locations within the catchment area of Low Port Primary School. These five new sites have capacity for 433 homes. It is already known that there is no available capacity at this School. The most recent 2013/14 pupil roll at Low Port Primary School was 220 pupils – significantly beyond its capacity for 198 pupils and the Council projects (2012 Base School Forecast) that it will remain above capacity until 2019 without further allocations in the LDP. This is set out in the table below.



Burghmuir



Drawing No. 10007-STEX-P004 School Catchment Area



Status: For Information

scale 1:25,000 @ A3 0 250 500 100







Two new sites (EOI-0105 and EOI-0168) with capacity for 68 new homes are proposed within the catchment area of Linlithgow Primary School, in addition to 12 homes carried forward from the current Local Plan (10/83). The most recent 2013/14 pupil roll of 414 pupils is at the limit of the pupil capacity for 415 pupils at Linlithgow Primary School. There is currently no capacity at Linlithgow Bridge Primary School. This is set out in the table below.

One new site (EOI-0131) with capacity for 30 homes is proposed within the Linlithgow Bridge catchment area, in addition to 14 homes carried forward from the current Local Plan (HLi29). Paragraph 3.88 of the MIR confirms that there is an education infrastructure constraint at Linlithgow Bridge Primary School. The most recent 2013/14 pupil roll of 201 pupils is in excess of the pupil capacity for 198 pupils. There is currently no capacity at Linlithgow Bridge Primary School for further development. This is set out in the table below.

This appraisal confirms that the Council's proposed development strategy is allocating land for housing where there is no education infrastructure capacity available. The available infrastructure is only in the Springfield Primary School catchment area on the east of the town.

Site Ref	Site Name	Site Capacity	School Catchment	School Capacity	2013/14 School Roll	Spare Capacity
EOI-0045	Land East of Manse Road, Linlithgow	45	Low Port Primary	198	220	-22
EOI-0062	Site at Edinburgh Road, Linlithgow	60	Low Port Primary	198	220	-22
EOI-0114	Wilcoxholm Farm/ Pilgrims Hill	200	Low Port Primary	198	220	-22
EOI-0184	Clarendon House, 30 Manse Road, Linlithgow	8	Low Port Primary	198	220	-22
EOI-0210	Clarendon Farm	120	Low Port Primary	198	220	-22
	•	433 homes	generates 137 pupils			No spare capacity

Site Ref	Site Name	Site Capacity	School Catchment	School Capacity	2013/14 School Roll	Spare Capacity
HLi29	Stockbridge North (2)	14	Linlithgow Bridge Primary	198	201	-3
EOI-0131	Mill Road, Linlithgow Bridge	30	Linlithgow Bridge Primary	198	201	-3
		44 homes	generates 14 pupils			No spare capacity

Site Ref	Site Name	Site Capacity	School Catchment	School Capacity	2013/14 School Roll	Spare Capacity
10/83	Westerlea Court	12	Linlithgow Primary	415	414	1
EOI-0105	Land at BSW Timber, Falkirk Road, Linlithgow	18	Linlithgow Primary	415	414	1
EOI-0168	Land at Preston Farm	50	Linlithgow Primary	415	414	1
		80 homes	generates 26 pupils			No spare capacity

Site Ref	Site Name	Site Capacity	School Catchment	School Capacity	2013/14 School Roll	Spare Capacity
EOI-0015	Boghall East	50	Springfield Primary	415	307	108
		50 homes	generates 16 pupils			Spare capacity

Paragraph 3.88 of the MIR confirms that ...significant spare capacity is also available at Springfield Primary school where the school roll is in decline. The MIR identifies one preferred site within the Springfield Primary School catchment area with capacity for 50 homes. The most recent 2013/14 pupil roll of 307 pupils is substantially below the pupil capacity for 415 pupils.



There would still be substantial spare pupil capacity at Springfield Primary School following completion of the preferred allocation for 50 homes at Boghall East to allow for development at Burghmuir. As the Council knows, Wallace Land has agreed to provide an extension at Springfield Primary to accommodate all pupils from 600 homes at Burghmuir.

The location of the Preferred Sites also need to take account of traffic impact especially on the High Street. A simple sequential approach does not address this issue.

It is essential that the Council's preferred development strategy does not exacerbate traffic congestion in Linlithgow town centre. The town centre already suffers from poor air quality and recent air quality monitoring suggests that a Local Air Quality Management Area is likely to be designated in 2015.

The six Preferred Sites south of the railway line have capacity for 483 homes. The traffic from these sites will only serve to exacerbate traffic congestion and the worsening air quality concerns in the High Street. The MIR does not present a clear strategy as to how the matter will be addressed.

What the Council has ignored is that SESplan requires the LDP to deliver the motorway slips at Junction 3 of the M9. This requirement is the only mitigation measure which can address the long standing problem of traffic congestion in the High Street.

The Council has chosen to identify the majority of preferred sites in Linlithgow in locations where there is no infrastructure capacity. Accordingly, the sites identified by the Council are almost certain to be non-effective in accord with the tests set out in PAN 2/2010. The Council's preferred development strategy for Linlithgow does not comply with the strategic guidance set out in SESplan paragraph 90. The allocation of these non-effective sites as proposed by the Council in the MIR will not enable the much needed delivery of the west facing slips at Junction 3 of the M9 which will relieve congestion and improve air quality in the town centre.

Comparison of the Preferred Sites assessed against Burghmuir

The Council has carried out individual Site Assessments for all submissions received at the *Expressions of Interest* stage. These have been subject to the Council's SEA Site Assessment.

Annex 1 sets out these Site Assessments and compares it against the Council's Assessment for Burghmuir and Wallace Land's Assessment of its proposal for Burghmuir.

This appraisal demonstrates that in terms of the Council's Site Assessments, Burghmuir was scored less favourably by the Council. The reason for this is the Council did not take into account the actual proposals submitted including the delivery of the motorway slip roads; the proposal for a hotel; the serviced sites for the health centre and the community sports area. The Council also ignores that the town centre bus service can serve the development. The Council's assessment included a foodstore which is no longer part of the proposal to the MIR.

Examining the Council's Site Assessments, Burghmuir is actually ranked higher than three of the sites identified as Preferred Sites (EOI-0210, Clarendon Farm for 120 homes; EOI-0168, Land at Preston Farm for 50 homes; and EOI-0114, Wilcoxholm Farm/ Pilgrims Hill for 200 homes). These sites account for 370 homes out of the total of 580 homes from the Preferred Sites.

If all of the measures presented by Wallace Land at Burghmuir are taken into account together with the mix of land use proposals then Burghmuir is the most favourable site presented to the Council for allocation in Linlithgow. The Council's SEA Site Assessment methodology confirms this.

All of the above demonstrates that the Council's development strategy for Linlithgow cannot be based on a simple sequential approach.



The approach required to be adopted by the Council for the Proposed Plan needs to take into account the availability of infrastructure capacity and the necessary mitigation measures to augment essential necessary infrastructure. This is the approach set out by SESplan which the LDP needs to comply with.

Question 30

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

The Council has not included Burghmuir as a Preferred Site in its development strategy for Linlithgow.

The Council has allocated a scale of development equivalent to the proposal which was subject of the application (Council ref: 0095/P/12) submitted by Wallace Land and was recommended for refusal. At that time, the Council considered that the application could not be approved because of a lack of education capacity at Linlithgow Academy, and that the proposal was contrary to the adopted Local Plan.

The Council has before it an Environmental Statement and Transport Assessment which clearly demonstrates that there are no adverse impacts arising from development of the scale proposed in the MIR at the eastern edge of Linlithgow providing the following measures are delivered:

- The motorway slips are delivered to mitigate traffic congestion in the High Street;
- Education capacity at Springfield Primary School is utilised to accommodate pupils from allocations in the Proposed Plan; and
- Investment is available to fund extensions to Springfield Primary and St. Joseph's Primary (as previously agreed by the Council and Wallace Land) along with the financial contributions to the secondary schools at Winchburgh as required by the Council's SPGs.

If Burghmuir was allocated in the Proposed Plan, all of these matters can be subject to Legal Agreement. There is no need for new supplementary planning guidance to address any of these additional infrastructure matters.

Benefits of concentrating the majority of the preferred sites in a single allocation at Burghmuir

Allocating the proposal at Burghmuir will also provide jobs, homes and infrastructure for both Linlithgow and West Lothian. Its allocation substantially strengthens the West Lothian economy by delivering:

- £90M of inward investment in West Lothian;
- Two motorway slip roads onto the M9 as allocated in the Local Plan;
- Hotel with conferencing facilities; residential care home and serviced site for a new health centre no foodstore proposal;
- Prospects for 1,000 more jobs through servicing the existing allocated Employment Site;
- 600 much needed homes including 90 affordable homes in accord with policy. Burghmuir will deliver much needed affordable homes in Linlithgow in accord with the Council's Local Housing Strategy. Land will be transferred to the Council at nil value for this purpose;
- Supports 200 construction jobs annually for the development period of 10 years;
- Proposes a serviced site for community sport facilities for the town; and



• £3M fund for Winchburgh non-denominational secondary school and £1.5M investment in Springfield and St Joseph's Primary Schools.

Burghmuir secures sustainable growth for West Lothian during the LDP period. It will be built out over a 10 year period. It is a critical part of the solution to help fund contributions to the new secondary school at Winchburgh and deliver the motorway slips. This site is in single ownership, is viable and can deliver town wide infrastructure including the slips. The delivery of this scale of infrastructure is not possible if the Council promotes this scale of development across several sites in Linlithgow.

Allocation of the site is in accordance with the requirements of SESplan paragraph 90.

Support for tourism

Burghmuir will strengthen the facilities offered for tourists coming to Linlithgow including spaces for coach layovers as well as a new hotel.

Modifications to the Preferred Strategy for Linlithgow

Wallace Land recommends the following changes to the development strategy:

- 1. The Council reconsiders its development strategy by investigating in more detail whether its Preferred Sites are effective. If its conclusion is that these sites are not capable of becoming effective in the LDP period, then it should allocate more land in the east of Linlithgow to accord with the requirements of strategic development strategy set out in SESplan (paragraph 90) to direct future development to sites where existing infrastructure exists or can be augmented. Wallace Land recommends that the proposals for Burghmuir should be considered as an alternative strategy for Linlithgow and should be allocated in the Proposed Plan. Wallace Land has already submitted sufficient information to demonstrate that it fully addresses all of the matters raised in the MIR;
- 2. By focusing the majority of development into a major land allocation in the east of Linlithgow at Burghmuir then the motorway slips will be delivered alleviating traffic congestion and subsequently improving air quality in the High Street;
- 3. Allocating the Burghmuir proposal in the LDP delivers development in the immediate LDP period to 2019 and does not compromise the environmental and infrastructure capacity in the town, as well as comprehensively delivering Linlithgow's long term infrastructure needs.

It is evident that none of the Preferred Sites in the MIR have taken into account the mitigation measures to resolve transport congestion and poor air quality in the High Street – the delivery of the motorway slips or indeed the difficulties of providing education capacity in the primary schools other than Springfield Primary. The failure to address these infrastructure impacts and the cost of solutions lead to the conclusion that the majority of the sites in the preferred development strategy are non-effective.



Annex 1 Comparative Assessment of Preferred Sites in Linlithgow with Burghmuir

SEA Site Assessment – Comparative Assessment of Preferred Sites in Linlithgow with Burghmuir

C'A D. C	Ref Site Name		Air		Bi	odivers	ity	_	natic tors		Cult	ıral Her	itage			ndscape ownscap		Mat	terial As	sets	P&H	Soil	Wa	iter	Total	Avg.	
Site Ref	Site Name	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	Score	Score	
EOI-0015	Boghall East	1	3	3	3	3	3	2	1	3	3	3	3	3	3	1	3	1	2	2	1	1	2	2	52	2.26	WLC Assessment
EOI-0045	Land East of Manse Road, Linlithgow	1	3	3	3	3	3	3	3	3	3	3	3	3	1	1	3	1	2	1	3	1	2	3	55	2.39	WLC Assessment
EOI-0062	Site at Edinburgh Road, Linlithgow	1	3	3	3	3	3	3	1	3	3	3	3	1	3	3	3	3	2	3	1	3	2	2	58	2.52	WLC Assessment
EOI-0105	Land at BSW Timber, Falkirk Road, Linlithgow	1	3	3	3	3	3	3	1	3	3	3	3	3	3	3	3	3	2	3	1	3	2	2	60	2.61	WLC Assessment
EOI-0114	Wilcoxholm Farm/ Pilgrims Hill	1	1	1	3	1	1	1	2	3	3	3	3	1	3	1	3	1	2	1	3	1	2	3	44	1.91	WLC Assessment
EOI-0131	Mill Road, Linlithgow Bridge	1	3	1	3	3	3	3	1	3	3	3	3	3	3	1	3	1	2	1	1	1	3	3	52	2.26	WLC Assessment
EOI-0168	Land at Preston Farm	1	1	1	3	1	1	3	1	3	3	1	3	3	1	1	3	1	2	1	3	1	2	3	43	1.87	WLC Assessment
EOI-0184	Clarendon House, 30 Manse Road, Linlithgow	1	3	3	3	3	1	3	2	1	3	3	3	1	3	3	1	3	2	1	1	3	2	3	52	2.26	WLC Assessment
EOI-0210	Clarendon Farm	1	1	1	3	3	1	1	1	3	3	3	3	1	3	1	3	1	2	1	3	1	2	3	45	1.96	WLC Assessment
EOI-0103	Burghmuir, Linlithgow	Х	х	х	✓	✓	✓	✓	?	✓	✓	✓	✓	✓	✓	Х	✓	х	1	х	х	х	Х	1			WLC Assessment
EOI-0103	Burghmuir, Linlithgow	1	1	1	3	3	3	3	2	3	3	3	3	3	3	1	3	1	2	1	1	1	1	2	48	2.09	WLC Assessment
EOI-0103	Burghmuir, Linlithgow	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	1	3	1	3	3	65	2.83	Geddes Consulting Reassessment

	Ranking	Score Value	Scoring Range	Effect
✓	No significant adverse effects	3	2.6-3.5	Positive
?	Effects are uncertain	2	1.6-2.5	Unknown
/	Information is unavailable or unclear	2	1.6-2.5	Unknown
x	Significant adverse effect	1	0-1.5	Negative

Scoring Justification for Burghmuir against SEA Factors

Air	Biodiversity	Climatic Factors	Cultural Heritage	Landscape & Townscape	Material Assets	Population and Health	Soil	Water
1.Avoid AQMAs: The site is not located within an Air Quality Management Area. The delivery of the motorway slips will provide the solution to the worsening of the air quality in the town centre. 2.Good proximity to jobs / services: All new homes will be within reasonable walking distance of a number of amenities including a primary school, local shops and town centre. 3.Good access to existing or proposed public transport: All new homes will be within easy walking distance (400m) of existing bus services located on Blackness Road. All new homes will also be within reasonable walking distance (1600m) of Linlithgow train station.	designated international nature conservation sites: Development of this site will not affect any of these designations. 5. Avoid significant effect on designated national/ regional / local biodiversity sites & ancient woodland: There are not designations on or adjacent to the site. Development of this site will not affect any of these designations. 6. Avoid adverse direct impact on species / habitats or makes positive contribution to emerging green network: The proposed SUDS and open space strategy will improve and enhance the biodiversity of the site linking in with the existing greenspace network to the west of the site in Springfield. Garden areas will also enhance biodiversity within the site.	services and amenities, reducing the need for car journeys. 8. Occupy a location at risk of increased flooding or instability due to climate change: The Flood Risk Assessment and SEPA flood risk map indicates that the site is not located in an area at risk of fluvial flooding.	9.Avoid adverse effects on listed buildings: The development of the fields are adjacent to the C(S) listed farmstead. Development of this site will not adversely impact the setting of this Listed Building as confirmed in the Cultural Heritage Assessment. 10.Avoid adverse impacts on Scheduled Ancient Monuments: There are no SAMs within or close to the site. 11.Avoid adverse impact on locally important archaeological sites: There are no significant adverse impacts. 12.Avoid adverse effects on Gardens and Designed Landscapes: There are no Gardens or Designed Landscapes within the vicinity of the site. 13.Avoid adverse effects on Conservation Areas & or other areas of architectural historic or townscape interest. The site is not located within a Conservation Area.	14.Avoid AGLVs / Areas of Special Landscape Control / Areas of Special Control: The site is not located within an AGLV. Development of the site will not impact on any designation. 15.Avoid conspicuous locations that require extensive landscape / structural planting: The site is well contained by existing landscape and development to the west and motorway to the north. It is not a conspicuous location. 16.Avoid loss of / adverse effects on public open space improve open space provision (quantity / quality): The proposal includes public open space to meet Council requirements and improves the existing path network, making greenspace network publicly available.	17.Avoid loss of land important to avoidance of coalescence / preservation of settlement identity: The development of this site does not cause coalescence. The greenspace framework proposed maintains the settlement's identity and safeguards the landscape character of Blackness Road. 18.Safeguard mineral resources from sterilistation: The site is not within an Area of Search for opencasting as currently identified in the WLLP. 19.Minimise use of Greenfield Land: The site is currently used for agriculture and is Greenfield land.	20.Avoid co-location of sensitive development with industrial facilities / economic allocations: Wallace Land has prepared a Development Framework for this site. The proposal for mixed use development at Burghmuir is adjacent to land allocated for economic development. The location of housing and economic development as proposed in this Development Framework is mutually compatible. The economic development will not adversely affect the amenity of the residential development.	21.Avoid loss of prime quality agricultural land and peatland: The site is located on prime agricultural land as confirmed in the Macaulay Land Capability for Agriculture Mapping. British Geological Mapping indicates that the site is not located in an area of peatland. All greenfield Preferred Sites in the Linlithgow development strategy are located on prime quality agricultural land.	22.Maintain status of baseline water bodies: SUDS will be incorporated as part of the overall greenspace framework for the site. The SUDS strategy will ensure that there is no degradation of the existing water quality, including the Linlithgow Loch SSSI. 23.Minimise flood risk (on site or elsewhere): The SEPA flood risk map indicates that the site is not located in an area at risk of fluvial flooding. The SUDS strategy for the site will ensure that surface water runoff is maintained at greenfield levels.

Note: Assessment informed by scoring by Council for similar greenfield sites in West Lothian Local Development Plan Strategic Environmental Assessment Environmental Report