

BY EMAIL

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

23806/A5/IH/lj
17 October 2014

Dear Sir/Madam

REPRESENTATION TO THE WEST LOTHIAN LOCAL DEVELOPMENT PLAN MAIN ISSUES REPORT

Please see below for representations to the West Lothian Local Development Plan Main Issues Report (MIR) 2014, prepared on behalf of Robertson Homes. We also enclose a copy of the MIR Questionnaire details page and two supporting drawings.

Main Issue 3: Housing Growth, Delivery and Sustainable Housing Locations

Question 15: It is noted that the preferred strategy for housing growth in West Lothian is to allocate land for an additional 3,500 houses over and above existing committed development. This is the largest amount of new housing land of the three strategy scenarios presented by the Council. Part of the preferred strategy is based on the need to maintain a five year supply of effective housing land at all times and in continuing to promote the redevelopment of appropriate brownfield sites.

Robertson Homes propose an amended boundary to Committed Site references HLv100 and HLv134, relating to land under its control at New Calder Paper Mill, Mid Calder. The purpose of re-establishing the allocation boundary is to ensure that the LDP will be up to date with the current development proposals, to consolidate the existing two allocations and to include small portions of adjacent land that are required to ensure the viability of this allocation. The proposed revised allocation boundary for the Committed Site is enclosed as drawing 23806.01.

The existing allocations have been included within the development plan for at least 9 years and Robertson Homes is the third developer looking to secure delivery of the proposed housing. The Committed Site allocations in the West Lothian Local Development Plan Main Issues Report allow for a combined capacity of 50 units for HLv100 and HLv134, a reduction of 5 units from the adopted Local Plan. It is proposed for a single combined allocation to allow for a site capacity of 57 units. The Edinburgh and the Lothians Housing Land Audit 2012 identifies the New Calder Paper Mill site (Ref 99/4) as having a capacity of 50 units, programmed for completion between 2014-2016 at 25 units a year. Our suggested minor amendment will reflect potential to accommodate a further 7 homes on this committed site.

The amended allocation boundary includes small areas of adjacent land to the west and east, also under control of Robertson Homes. The potential for a small number of houses in these areas is important to ensure the viability and delivery of the site within the lifetime of the Plan. New and accessible open space, through maintained grassland and a dry SUDS feature, will also be provided within this area to ensure an appropriate and attractive new residential development can be

provided. As part of our proposal, the existing designations of this land as an Areas of Special Landscape Control (Policy ENV 21) and Land Safeguarded for Open Space (COM 2) should be removed.

These areas of land are not publically accessible due to fencing, the overgrown nature of the land and the lack of appropriate pathways. They are not used as open space for recreation or amenity at present. Due to these reasons, we do not consider it appropriate or necessary for this land to be safeguarded for open space through Policy COM 2. Almond Park, to the immediate north of the river and accessible from the site, provides a significant scale of local parkland. Appropriately sited development on the expanded Committed Site allocation will not have an adverse impact on the character of the River Almond valley.

The West Lothian Open Space Strategy – Interim Review (2010) does not identify any audited classification of open space on the proposal site. This demonstrates that the open space within the site is not considered to form part of the most important level of open space classification. The stated scope of the study acknowledges that inaccessible and privately owned land has not formed part of the study. However, the SNH Greenspace Map, believed to be collated from the specific GIS datasets provided by local authorities, also does not recognise any open space classification on the proposal site.

The proposal set out above will allow for development that will transform this unused land into a new area of greenspace, with a pathway around an attractive SUDS feature that links to the public path and bridge over the River Almond. This will have the effect of increasing the level of useable amenity open space in the local area. The expanded allocation will also allow 7 additional homes from the currently stated capacity.

Question 19: Robertson Homes consider that the best way for the Council to maintain an effective five year housing land supply in the current economic climate is to support any reasonable extension to existing developer-backed housing allocations, and to promote a generous and flexible approach to new allocations.

For examples, sites HLv100 and HLv134 have the capacity for limited expansion into adjacent areas of currently inaccessible adjacent land, covered by scrub woodland. This is best achieved by an expanded Committed Site allocation with an increased capacity of 57 units. The removal of a small area of designations under COM 2 and ENV 21 will strengthen the viability of the site and not result in the loss of any valuable open space.

Main Issue 6: The Natural and Historic Environment

Question 51: Robertson Homes agree with the 'Preferred' approach to reduce the number of local landscape designations as per the recommendations of the Local Landscape Designation Review (2014). In particular, Robertson Homes support the removal of designations for Areas of Special Landscape Control and the use of Special Landscape Area designations. Robertson Homes support the use of the Special Landscape Area designations only in the candidate areas set out in the Local Landscape Designation Review, and not as a blanket replacement to the out-dated Areas of Special Landscape Control designations.

Question 52: Robertson Homes do not agree with the 'Alternative' approach to landscape designations in West Lothian. The approach to local landscape designations needs modernised in line with national guidance, with the number and type of designations rationalised to ensure these are focused on areas with specific need for protection.

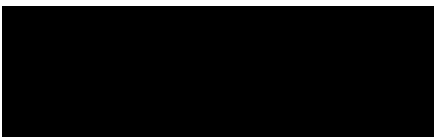
Question 70: Robertson Homes considers that the Proposed Local Development Plan should be prepared in close conjunction with the findings of the emerging Open Space Strategy 2. In particular, a revised Audit and/or reassessment of open space designations should ensure that

informal open spaces are only protected where they are accessible, are actively used as part of the green network or have high ecological value. Any revised COM 2 designations should not be used on informal open space to protect landscape setting as this is the purpose of Special Landscape Areas.

Robertson Homes request the removal of part of the existing COM 2 designation on land adjacent to housing allocation HLv134, with these areas as defined on drawing 23806.02. These areas of land can be described as informal open space. However, these are not used for any amenity or recreational use and are not publically accessible. The removal of this land as COM 2 will actually help to turn part of this land into attractive and accessible open space that can be used by the local community. It will also assist in the delivery of the committed housing allocation at the former New Calder Paper Mill – a brownfield site with a committed locational need for new housing.

Please contact me if you have any questions about these representations by Robertson Homes Ltd.

Yours faithfully



IAIN HYND
Senior Planner

Enc

West Lothian Local Development Plan Main Issues Questionnaire

FOR OFFICIAL USE ONLY

Unique Ref No: MIRQ0214

Date:

Submit by Email

Print Form



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		<input 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>	Robertson Homes	
Postal address	C/o Barton Willmore 68-70 George Street Edinburgh	
Postcode	EH2 2LR	
E-mail	iain.hynd@bartonwillmore.co.uk	
Telephone	0131 220 7777	

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.

The scaling of this drawing cannot be assured

Revision Date Drn Ckd



— Proposed Committed
Site Allocation
Boundary

Project
Calder Paper Mill
Calder Park Road

Drawing Title
Proposed Committed Site Allocation
Boundary for HLv100 & HLv134

Date	Scale	Drawn by	Check by
17.10.14	1:1250	MW	IH

Project No	Drawing No	Revision
23806	01	-

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 Proposed Removal of Com 2 Designation

Project
Calder Paper Mill
Calder Park Road

Drawing Title
**Proposed Removal of
 Com 2 Designation**

Date	Scale	Drawn by	Check by
17.10.14	1:1250	MW	IH
Project No	Drawing No	Revision	
23806	01	-	



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