

Our Ref: Seafield Road - Bat Inspection of Roadside Trees  
Date: 09<sup>th</sup> July 2013

brindley  
associates  
landscape architects &  
environmental planners

design | assessment | ecology

Email

Dear [REDACTED]

### Seafield Road - Bat Inspection of Roadside Trees

We confirm that an IEEM registered ecologist and licensed bat worker attended site on 08.07.13 to inspect the trees on Seafield Road which are within the current application boundary. We confirm that there does not appear to be any bat potential associated with the trees in question. Below is a short overview of the survey methodology and the results:

#### Methods

A licensed bat worker (Laura Davis, SNH Licence No 13704) visited the site on the morning of 08.07.13. The trees along Seafield Road, between Hillview Cottages and Blackburn were surveyed from the ground, looking for any features which may be used by roosting bats. A torch and binoculars were used to aid the survey.

The following trees were inspected on the south of the road:

- Beech, NS 99541 65519;
- Beech, NS 99538 65518;
- Beech, NS 99529 65515;
- Ash, NS 99513 65512; and
- Beech, NS 99479 65516.

The following trees were inspected on the north of the road:

- Multi-stemmed ash, NS 99538 65534; and
- Ash, NS 99505 65524.

#### Results

No potential for use by roosting bats was seen in any of the tree surveyed, and therefore with regards to bats there is no reason why these trees cannot be felled. There is a bird nest within the upper reaches of the ash of the south side of the road, although it is not clear whether this is currently in use. Due to the dense foliage it was hard to see if there are any nests within any of the other trees, and this should be borne in mind prior to felling. Ideally, trees with potential to support nesting birds would be felled outwith the nesting season, i.e. September to February, unless they can be shown to be free of nesting birds.

I trust that this is of use and please feel free to contact me if you need to discuss further.

Yours sincerely

[REDACTED]

Ross Wilkie BSc (Hons) Ecol Dip LRM MLA CMLI  
Director

directors:

**Joanne Brindley**  
BA Dip LA CMLI  
chartered landscape architect

**Andrew Macfarlane**  
BSc (Hons) Dip TP CMLI CBIol  
MIBiol CERN MIEEM  
environmental scientist

**Ross Wilkie**  
BSc (Hons) Ecol Dip LRM,  
MLA, CMLI  
chartered landscape architect



# West Lothian Local Development Plan Main Issues Questionnaire

FOR OFFICIAL USE ONLY

Unique Ref No:

Date:

Submit by Email

Print Form



West Lothian  
Council

The council has commenced preparation of its first *Local Development Plan* (LDP). The LDP will replace the *West Lothian Local Plan* and will set out a local interpretation of the requirements of the *Strategic Development Plan* (SESplan) and national guidance. The LDP is a land use plan that identifies site specific development opportunities, sets out the council's key development priorities and provides the policy context for the consideration of applications for planning permission.

The current *West Lothian Local Plan* was adopted by the council in January 2009 is available to view on the council's website at <http://www.westlothian.gov.uk/WLLP>

The *Main Issues Report* (MIR) for the West Lothian LDP is the first key stage in the preparation of the LDP and we are seeking your views on this. All documentation for the MIR can be viewed at <http://www.westlothian.gov.uk/MIR>

Full details on the timetable and stages for preparing the LDP are set out in the Development Plan Scheme 6 which is also available online: <http://www.westlothian.gov.uk/article/2725/Development-Plan-Scheme>

A questionnaire to accompany the MIR is set out below and we would be happy if you would complete and return to us.

There are 98 questions that accompany the *Main Issues Report*. You do not have to respond to all of the questions set out only those which you feel are of particular relevance to you. Completed questionnaires should be returned to us by e-mail to [wlldp@westlothian.gov.uk](mailto:wlldp@westlothian.gov.uk) by no later than **5pm on Friday, 17 October 2014**.

Alternatively, please download a copy of the form and send it to us at: Development Planning, West Lothian Council, County Buildings, High Street, Linlithgow, EH49 7EZ (postal address only).

You can keep up to date on the LDP by subscribing to our LDP e-newsletter. If you have not already subscribed, you can do so by going to the following link and following the relevant instructions:

<https://newsletters.westlothian.gov.uk/eNewsletterPro/optin/optinealert.htm>

Name	JOHN HANDLEY ASSOCIATES LTD	<input checked="" type="radio"/> Mr <input type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <i>(please tick as appropriate)</i>
Organisation <i>(where applicable)</i>	ON BEHALF OF: HALLAM LAND MANAGEMENT LIMITED	
Postal address	1 ST COLME STREET, EDINBURGH	
Postcode	EH3 6AA	
E-mail	<a href="mailto:john.handley@johnhandley.co.uk">john.handley@johnhandley.co.uk</a>	
Telephone	0131 220 8253	

Please note that any comments you make will be open to public scrutiny, but we will keep your contact details private and confidential and will only use your name or business name.

## By filling in this questionnaire you are helping to shape the future of West Lothian

It would also be helpful if you would complete the *Equal Opportunities Questionnaire*, set out at the end of this document.

### **Local Development Plan Vision Statement**

*By 2024 West Lothian's population will have grown and an improved employment position within a more diversified local economy will have been established. It will be better connected by road and public transport and will have a greater choice of housing and an appropriate range of education, community, health, retail, recreation and leisure facilities and a network of green spaces to meet the needs of its growing population. Development will take place in a sustainable way that protects and improves the area's built and natural heritage assets, meets the challenges of climate change and renewable energy and helps regenerate deprived areas and improves the quality of life for people living in West Lothian.*

#### **Question 1**

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

YES     NO     Don't know

Do you have any additional comments?

#### **Question 2**

Do you have an alternative vision, and if so, what is it?

The aims of the *Main Issues Report* and Associated Main Issues are set out in pages 13 of the MIR.

#### **Question 3**

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

#### **Question 4**

Do you have an alternatives, and if so, what are they?

## Main Issue 1: Economic Development and Growth (paragraphs 3.1 - 3.31)

Which areas of West Lothian would be best to direct new economic development towards?

How can the LDP support the council's *Economic Strategy* and facilitate the creation of jobs?

### **Preferred approach**

The council's *preferred approach* to employment land is to review the range of uses which could be accommodated on employment land with a view to accommodating a more flexible approach. This flexible approach will involve removing the single user status of two large sites (Linhouse and Eliburn in Livingston), and allowing a wider range of uses on currently allocated employment sites at locations to be identified in the LDP. Such an approach, for example, would apply to certain traditional employment allocations and industrial estates such as East Mains Industrial Estate, Broxburn and Deans & Houstoun Industrial Estates, Livingston and at Whitehill and Whiteside Industrial Estates, Bathgate and Murraysgate, Whitburn reflecting the broad range of uses which already exist at these locations and to allow for other employment/commercial orientated uses to be accommodated e.g. car showrooms, trade centre outlets and certain leisure uses.

The LDP will continue to support development of existing employment allocations, including sites within the core development areas, and support the servicing of employment allocations to assist in attracting inward investment. New employment land allocations will also be identified to supplement and in some cases complement the existing supply, including a new strategic employment site at Balgornie adjacent to the recently opened Junction 4a on the M8 at Whitburn.

In addition, the LDP will seek to encourage small business development by promoting small workshop developments within communities and home working in appropriate locations. In a limited number of cases, existing employment land is identified as being suitable for potential residential development.

The council's preferred use of the former Vion plant in Broxburn is to allocate the site for housing.

The preferred approach would also include meeting the requirements of the SDP in full.

### **Alternative approach**

The council's '*Alternative*' approach to employment land is to restrict the range of uses which can be accommodated on employment sites, and to seek to augment the existing portfolio (including Linhouse) by identifying new strategic or local employment sites beyond existing allocations and SESplan requirements to maximise land availability and choice for potential employers. This would, however, result in an oversupply of employment land and could see large employment estates located in non-sustainable, greenfield locations that could have associated local traffic, infrastructure and environmental impacts.

In relation to the former Vion plant at Broxburn the council's alternative approach is to continue to allocate the site for employment use.

### **Question 5**

Do you agree with the 'Preferred' approach to employment land which would introduce an opportunity for a broader range of land use to be supported within existing employment land allocations and industrial estates?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 6**

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

YES     NO     Don't know

Do you have any additional comments?

**Question 7**

Do you have any other alternative approaches? What are they and how would you make them work?

**Question 8**

Has the council identified enough employment land in West Lothian to meet requirements and are the larger employment sites in the right locations?

YES     NO     Don't know

Do you have any additional comments?

**Question 9**

Do you agree that the single user employment site at Linhouse, Livingston (ELv54) should be sub-divided for employment and mixed uses, including residential use of up to 250 houses?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

### Question 10

Do you agree that the former strategic employment allocation at Eliburn, Livingston (ELv25) should continue to be promoted for employment uses but not as a single user site?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

### Question 11

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

If not, why not?

What other locations would you suggest?

YES     NO     Don't know

Do you have any additional comments?

## Main Issue 2: **Community Regeneration** (paragraphs 3.31 - 3.34)

Where should the focus for community regeneration in West Lothian be and what should this seek to deliver?  
How can the LDP incentivise development to take place within regeneration areas?  
How can the LDP support the council's Regeneration Plan?

### **Preferred approach**

The council's preferred approach to community regeneration is to focus regeneration initiatives on areas identified in the Scottish Index of Multiple Deprivation 2012. This principally includes the smaller settlements in the west of West Lothian identified as Armadale, Blackburn, Blackridge, Fauldhouse, Stoneyburn and Whitburn. Other areas include Bathgate and Boghall and settlements within the Breich Valley where headline levels of disadvantage including unemployment, financial exclusion, poor health and lower education attainment have been identified.

These communities are often characterised by a range of factors which can include high levels of unemployment, low income, lower levels of education attainment, and access to services. To create more balanced communities, address issues of multiple deprivation and to attract private sector investment it is proposed to seek to identify initiatives to generate more investment in these communities.

### **Alternative approach**

The council's alternative to community regeneration is to not pursue regeneration objectives through the development plan and to rely solely on other council led regeneration initiatives.

### **Question 12**

Do you agree with the 'Preferred' approach to community regeneration in West Lothian?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

We support the preferred approach to focus regeneration initiatives on the smaller settlement in the west of West Lothian, which specifically includes Blackburn, through the creation of more balanced communities and the attraction of private sector investment and development. This objective could be achieved through the allocation of our client's 6.5 hectare site at Seaford Road, Blackburn (part of Site EOI - 0136) for new housing development. Full details on the particular merits and advantages of this site are set out in the attached Supporting Planning Statement.

### **Question 13**

Do you agree with the 'Alternative' approach to community regeneration in West Lothian?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

### **Question 14**

Do you have any other alternative approaches?

What are they and how would you make them work?

### Main Issue 3: **Housing Growth, Delivery and Sustainable Housing Locations** (paragraphs 3.35 - 3.63)

How much new housing is required in West Lothian?

Where should new housing development take place, and where should it not be encouraged?

How can the risks associated with the existing development strategy as set out in the *West Lothian Local Plan* be reduced?

How can the rate of house building in West Lothian be increased to ensure that the required five year effective housing land supply is achieved and that the assessed housing need and demand is met in full over the plan period?

#### **Preferred Strategy**

The council's preferred strategy is scenario 3 to provide for more housing than the minimum required by the supplementary guidance required to support the SDP and the LDP should allocate housing land for an additional 3,500 houses above existing committed development. This would result in a level of development beyond requirements set out in the housing supplementary guidance to support the SDP. However, this scenario is only preferred if the council can be satisfied that the infrastructure required to support this scale of development can be delivered in full and also in recognition that it is not anticipated that this increased allowance will be delivered by 2024 but is there to allow for the delivery of development into the period 2024-2032.

This recognises that the strategy in the existing adopted local plan is reliant to some extent on a limited number of large, complex sites with high infrastructure costs being brought forward. It is now considered that a range of smaller housing sites, in various locations across West Lothian, is needed in order to provide for greater choice and effectiveness of sites, introduce local flexibility for the LDP and to ensure that a generous housing land supply is available, providing as a minimum, an effective five year housing land supply at all times, as required by SPP.

There is also a need to sustain the momentum built up in some of the existing large housing growth areas and make sure that these developments are viable going forward. Modest additional allocations in some of these areas will provide a degree of future proofing of the plan and help meet part of the need and demand for housing beyond the end of the plan period. Much of the existing housing land supply in core development areas and elsewhere will not be built out within the plan period and allocating additional housing sites in these areas through the LDP will help to maintain investor confidence and inform investment planning.

The allocation required by the draft supplementary guidance prepared by SESplan of 2,130 new houses beyond existing allocations of 22,847 units provides for a total of 24,977 units over the period 2012-2024.

By contrast, the preferred strategy proposes 26,347 houses which provides 3,500 houses above the base supply houses which is an increase of around 15% above the base supply.

This scale of housing allocation will reduce the risk of the LDP development strategy not being successful and is justified on the basis of:

- the need to maintain a five year supply of effective housing land at all times as required by Scottish Government planning policy;
- the need to ensure that there is a generous supply of housing land to accommodate the needs and demands of those seeking a house in West Lothian;
- the need to maintain West Lothian's attractiveness as an area which provides a range and choice of housing sites for those wishing to invest;
- linking the council's Economic Strategy to that of the housing market by providing a range and choice of house types suitable to indigenous and inward investors and the construction industry;
- providing for future affordable housing build programmes;
- continuing to redevelop appropriate brownfield sites;
- allowing the WLLP core development allocations and the strategic allocation at Heartlands, Whitburn to deliver over the long term whilst achieving the five year effective supply through the allocation of predominantly small to medium sized sites where requirements for infrastructure to assist delivery are less onerous on developers;
- allocating above 3,500 will generate the need for a 4th new secondary school which will be expensive to deliver in addition to existing infrastructure commitments;
- replacing allocations in the adopted *West Lothian Local Plan* which may no longer be supported by the site owners or due to reasons of development viability; and
- recognising that as the LDP progresses some housing sites may be delayed or may no longer come forward for a variety of reasons including unexpected development viability.

The preferred strategy is based around an aspiration for growth aimed at delivering sustainable economic prosperity and quality of life for communities in West Lothian and in particular building on the existing significant core development area allocations and strategic sites and will provide a broader range of housing sites.



### Alternative Strategy 1

Alternative Strategy 1 reflects scenario 2 set out above and proposes that the LDP should allocate housing land for an additional 2,600 houses, above existing committed development. This would result in a level of development beyond SDP requirements set out in the draft supplementary guidance.

This proposes allocating land for 25,447 houses i.e. 2,600 houses above existing commitments to provide a housing land supply which is around 1.4% more than SDP requirements. This alternative strategy 1 is a variation on the preferred strategy but with a smaller increase in housing allocations above the minimum requirement in the SDP. Whilst Alternative Strategy 1 will provide more choice than Alternative Strategy 2 (see below) there is a risk that the housing supply will not be regarded as sufficiently generous and that an effective five year housing land supply will not be available at all times because existing large sites are taking longer to get underway and build out. This could mean that other sites not allocated for development could be promoted for development and receive planning permission contrary to the development plan. Where the five year land supply is not maintained this could leave the council open to planning by appeal.

### Alternative Strategy 2

Alternative Strategy 2 reflects scenario 1 set out above and proposes that the LDP allocates housing land for an additional 2,130 houses above existing committed development. This would result in the requirement set out in the draft supplementary guidance being met but would not allow for any flexibility. A total of 24,977 houses, i.e. 2,130 houses above existing commitments, as required by the supplementary guidance for the SDP but with no flexibility allowance for additional development. This strategy represents a view that West Lothian should grow more slowly.

Whilst this alternative strategy may have certain attractions in terms of minimising impact on the environment and the need for additional infrastructure, it may mean that an effective five year housing land supply is not maintained at all times and could lead to relative economic decline whereby neighbouring authorities supporting higher growth scenarios, are better placed to take advantage of a potential economic upturn and recovery. Where the five year land supply is not maintained this could leave the council open to planning by appeal.

All of these reasons require to be balanced against the need to secure sustainable well located development, protect important environmental assets and landscapes of West Lothian and to have regard to impacts on existing communities and existing and future infrastructure requirements which are likely to arise. This will allow the LDP to focus on improving the quality of our existing established communities, facilities and environment as opposed to being negative in terms of other authorities benefitting from an upturn and the issue of planning by appeal and review a potential increase in housing numbers in the next LDP if economic recovery has indeed taken place in the first plan period.

### Question 15

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

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

We support the preferred strategy to provide more housing than the minimum required and the allocation of a generous supply of effective housing land throughout the West Lothian LDP Area. This should include the release of additional housing land in the Blackburn area in line with the preferred community regeneration strategy as set out under Main Issue 2 above. We would therefore request that the Council reconsiders its assessment of our client's 6.5 hectare site at Seafield Road, Blackburn and allocates this for new housing development in the Proposed LDP. Full details on the particular merits and advantages of this site are set out in the attached Supporting Planning Statement and accompanying technical reports which confirm that this site is an appropriate housing site.

**Question 16**

Do you agree with 'Alternative Strategy 1' for housing growth in West Lothian?

If so, why?

YES     NO     Don't know

Do you have any additional comments?

**Question 17**

Do you agree with 'Alternative Strategy 2' for housing growth in West Lothian? If so, why?

**Question 18**

Do you have another alternative strategy?

What is it and how would you make it work?

**Question 19**

How can the council maintain an effective five year housing land supply given the current economic climate?

By focussing on the allocation and delivery of effective housing sites in accessible, marketable and sustainable locations. Further to our responses to questions 12 and 15, the allocation of our client's 6.5 hectare site at Seafield Road, Blackburn (part of Site EOI-0136) for new housing development would help to meet this objective. Full details of the particular merits and advantages of this site are set out in the attached Supporting Planning Statement and accompanying technical reports.

Preferred and alternative options for housing sites, including potential de-allocations from the *West Lothian Local Plan* (paragraphs 3.64 – 3.73)

#### **Preferred Option**

The council's preferred option is that some housing sites allocated in the adopted *West Lothian Local Plan* and identified in Housing Land Audit 2012 are not included in the LDP. Details of sites are set out in the Settlement Statements accompanying the MIR.

#### **Alternative Option**

The council's alternative option is that all housing sites allocated in the adopted *West Lothian Local Plan* and identified in Housing Land Audit 2012 be included in the LDP.

#### **Question 20**

Do you agree with the 'Preferred' option for the removal of existing housing allocations from the development plan?  
If not, why not?

YES     NO     Don't know

Do you have any additional comments?

#### **Question 21**

Do you agree with the 'Alternative' option for the removal of existing housing allocations from the development plan?  
If not, why not?

YES     NO     Don't know

Do you have any additional comments?

#### **Question 22**

Do you have any other alternative options?  
What are they and how would you make them work?

YES     NO     Don't know

Do you have any additional comments?

**Preferred Approach to the Core Development Areas**

The council's 'Preferred' approach to the core development areas is to continue to support their delivery and allow for further longer term allocations at Winchburgh.

**Alternative Approach to the Core Development Areas**

The council's 'Alternative' approach is not to allow for any further development beyond that set out in approved master plans and the *West Lothian Local Plan*.

**Question 23**

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

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 24**

Do you agree with the 'Alternative' approach to the core development areas?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 25**

Do you have any other alternative options?

What are they and how would you make them work?

YES     NO     Don't know

Do you have any additional comments?

**Preferred Approach to Heartlands, Whitburn**

The council's 'Preferred' approach to Heartlands, Whitburn is to look favourably on proposals for additional housing within the existing housing allocation, subject to infrastructure constraints being resolved.

**Alternative Approach**

The council's 'Alternative' approach is that the number of houses at "Heartlands" be restricted to 2,000.

**Question 26**

Do you agree with the 'Preferred' approach to Heartlands, Whitburn?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 27**

Do you agree with the 'Alternative' approach to Heartlands?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 28**

Do you have any other alternative options?

What are they and how would you make them work?

YES     NO     Don't know

Do you have any additional comments?

**Preferred approach**

The council's 'Preferred' approach to Linlithgow is that the "area of restraint" be re-considered to allow for greenfield release of housing, employment and potential tourist related development. Should the area of restraint be removed, any development would be dependent upon the delivery of a new secondary school at Winchburgh and therefore would be focussed principally in latter plan period. Any land release would follow a sequential approach as set out in paragraph 3.93

**Alternative approach**

The council's 'Alternative' approach to Linlithgow is that the "area of restraint" approach be maintained and that development be directed to brownfield opportunities within the existing settlement boundary in the first instance and thereafter greenfield release within the town.

**Question 29**

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

YES     NO     Don't know

Do you have any additional comments?

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

YES     NO     Don't know

Do you have any additional comments?

**Question 30**

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

**Question 31**

Should land continue to be safeguarded for west facing slip roads on the M9 at Junction 3, Linlithgow?  
If so, should new development be promoted in Linlithgow to ensure that funding for these can be secured?

YES     NO     Don't know

Do you have any additional comments?

**Preferred approach**

The council's 'Preferred' approach to the Deans South estate, Livingston, is that the area be identified for comprehensive redevelopment for approximately 300 new houses.

**Alternative approach**

The council's 'Alternative' approach to the Deans South estate, Livingston, is that the LDP should not identify the area for comprehensive redevelopment for approximately 300 new houses.

**Question 32**

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

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 33**

Do you agree with the 'Alternative' approach for addressing the Deans South estate?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 34**

Do you have any other alternative approaches?

What are these and how would you make it work?

YES     NO     Don't know

Do you have any additional comments?

**Preferred approach**

The council's 'Preferred' approach to affordable housing is to review the terms of the current affordable housing policy and set this out in supplementary guidance.

**Alternative approach**

The council's 'Alternative' approach to affordable housing is to continue to implement existing policy.

**Question 35**

Do you agree with the 'Preferred' approach to affordable housing? If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 36**

Do you agree with the 'Alternative' approach to affordable housing? If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 37**

Do you have any other alternative approaches? What are they and how would you make them work?

YES     NO     Don't know

Do you have any additional comments?



#### Main Issue 4: Infrastructure Requirements and Delivery

How can we ensure that new development in West Lothian makes best use of existing infrastructure?

How can we make sure that the cost of providing new infrastructure needed to support new development does not fall unduly on the tax payer?

How can we ensure that developer contribution costs are affordable and do not make the development of sites unviable?

Infrastructure requirements and delivery – providing for community needs: education, healthcare and sports facilities

#### Preferred approach

The council's 'Preferred' approach to infrastructure provision, in particular education provision, is to promote additional growth which can for the most part utilise existing infrastructure capacity, and minimise additional significant new infrastructure requirements over and above existing planned upgrades and requirements. Developer contributions will continue to be sought, the basis for which will be set out in a combination of generic and specific supplementary guidance. The council's preferred approach to infrastructure delivery is supported by Policy 9 of the SDP. The preferred approach is also to further develop funding mechanisms and supplementary guidance to assist in delivery.

#### Alternative approach

The council's 'Alternative' approach to infrastructure provision is not to promote growth particularly that which would require substantial investment in new infrastructure given the current limited ability of the development industry to deliver up-front funding for infrastructure projects. Such an approach, however, is unrealistic and contrary to national planning policy.

#### Question 38

Do you agree with the 'Preferred' approach to infrastructure provision? If not, why not?

YES     NO     Don't know

Do you have any additional comments?

We support the preferred approach to promote additional growth which utilises existing capacity and allows for appropriate level of developer contributions to be sought to help deliver planned improvements, particularly in respect of education capacity. Further to our responses to questions 12, 15 and 19, the allocation of our client's 6.5 hectare site at Seafield Road, Blackburn (part of Site EOI-0136) for new housing development would help to meet this objective. Full details of the particular merits and advantages of this site are set out in the attached Supporting Planning Statement and accompanying technical reports.

#### Question 39

Do you agree with the 'Alternative' approach to infrastructure provision?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 40**

Do you have any other alternative approaches?

What are they and how would you make them work?

YES     NO     Don't know

Do you have any additional comments?

**Question 41**

How can the level of infrastructure required to support the scale of development proposed be delivered?

Do you have any additional comments?

Infrastructure – transport and access in and around West Lothian (*paragraphs 3.132 – 3.159*)

**Preferred approach**

The council's 'Preferred' approach to promoting access to/from/within West Lothian is to address outstanding constraints in the strategic and local road network which are essential to accommodate community growth and in particular economic and housing growth and tackle existing traffic issues whilst promoting sustainable transport measures on an incremental basis in conjunction with new development, and as resources allow. Within this, the preferred approach is to promote development on or very near to existing public transport facilities or where there is potential for new facilities. This approach will help to sustain and improve services which in turn will become more attractive alternatives to the private car.

**Alternative approach**

The council's 'Alternative' approach to promoting access to/from/within West Lothian is to shift emphasis away from addressing road network issues to focus exclusively on sustainable transport measures, however, this is not considered a reasonable alternative given the commitment to strategic road improvements through NPF2, the SDP and the need to accommodate existing committed development across West Lothian.

Given physical, policy and resource constraints, it is not considered that there are any other reasonable alternatives to the preferred approach.

**Question 42**

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

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

#### Question 43

Do you agree that the council should continue to work towards the provision of a new rail station at Winchburgh?  
If not, why not?

YES     NO     Don't know

Do you have any additional comments?

#### Question 44

Do you have any other alternative approaches?  
What are they and how would you make them work?

YES     NO     Don't know

Do you have any additional comments?

#### Main Issue 5: **Town Centres and Retailing** (paragraphs 3.160 – 3.171)

What do we need to do to promote and sustain our traditional town centres in West Lothian and consolidate the sub-regional centre at Almondvale, Livingston?

#### **Preferred approach**

The council's 'Preferred' approach to town centre retail provision in West Lothian is to:

- sustain and improve town centres by applying the sequential approach to proposals for retail and leisure development;
- reduce leakage from some areas in accordance with the council's Retail Capacity Study;
- facilitate the creation of a new town centre in Winchburgh;
- safeguard existing and promote new local neighbourhood centres: and
- bring about village and town centre improvements by highlighting development opportunities, supporting the development of brownfield sites, implementing improvements through the capital plan and, where appropriate, securing developer contributions.

The preferred approach includes removing retail policy restrictions currently in place in Bathgate and Linlithgow town centres to allow for a broader range of uses which will support the take up of empty units. In addition, initiatives to support and promote development above shops will be encouraged, subject to availability of infrastructure and to the operation of existing business premises not being unduly prejudiced.

### Alternative approach

The 'Alternative' approach is to:

- sustain and improve town centres by applying the sequential approach to proposals for retail and leisure development;
- reduce leakage from some areas in accordance with the council's Retail Capacity Study;
- facilitate the creation of a new town centre in Winchburgh;
- safeguard existing and promote new local neighbourhood centres: and
- bring about village and town centre improvements by highlighting development opportunities, supporting the development of brownfield sites, implementing improvements through the capital plan and, where appropriate, securing developer contributions.

This approach excludes removing current retail policy restrictions in place in Bathgate and Linlithgow town centres.

### Question 45

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

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

### Question 46

Do you agree with the 'Alternative' approach to town centres and retail provision in West Lothian?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

### Question 47

Do you have an alternative approach?

What is it and how would you make it work?

YES     NO     Don't know

Do you have any additional comments?

## Main Issue 6: The Natural and Historic Environment (paragraphs 3.172 – 3.213)

How can planning policy promote sustainable patterns of development to protect our valued landscapes, built and cultural heritage and create a green network across West Lothian?

### Preferred approach

The council's 'Preferred' approach to the West Lothian natural environment is to direct development to appropriate brownfield sites within settlements in the first instance but also to bring forward the release of greenfield sites in sustainable locations where there are no alternatives in order to meet strategic requirements. When considering greenfield release the council will have regard to the LLDR and other relevant factors, particularly sustainability but also issues of townscape and settlement coalescence. This may allow for some release of new development sites on the edge of settlements, thereby maximising use of existing infrastructure, whilst protecting visual amenity and the biodiversity value of the countryside and preventing coalescence of settlements.

In some instances it may be necessary to extend countryside and landscape designations to protect the purposes for which the land was designated be it landscape value, landscape character and landscape enhancement, buffers to coalescence of settlements, protection of prime quality agricultural land and historic gardens and designed landscapes in West Lothian.

### Alternative approach

The 'Alternative' approach to the West Lothian natural environment and landscapes is to focus less on brownfield land and allow parts of designated areas to be released for housing or employment development.

### Question 48

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

If not, why not?

YES  NO  Don't know

Do you have any additional comments?

We support the preferred approach to release appropriate greenfield sites on the edge of existing settlements. Further to our responses to questions 12, 15, 19 and 38, the allocation of our client's 6.5 hectare site at Seafield Road, Blackburn (part of Site EOI-0136) for new housing development would meet this objective. Full details of the particular merits and advantages of this site are set out in the attached Supporting Planning Statement and accompanying technical reports. As confirmed in a recent appeal decision, this site is located in an accessible, sustainable location and would not adversely impact on any sensitive environmental, landscape, townscape or biodiversity areas and would not lead to coalescence. It can therefore be released for new housing development in line with SESplan Policy 7. We would therefore request its removal from the existing countryside designation and its allocation in the Proposed LDP as a new housing site with capacity for 120 units.

### Question 49

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

If not, why not?

YES  NO  Don't know

Do you have any additional comments?

**Question 50**

Do you have an alternative approach?  
What is it and how would you make it work?

YES     NO     Don't know

Do you have any additional comments?

Landscape approach and designation (*paragraphs 3.172 - 3.170*)

**Preferred approach**

The council's 'Preferred' approach to landscape designations is to reduce the number of landscape designations in order to reflect the findings of the Local Landscape Designation Review and identify candidate Special Landscape Areas (cSLA). Special Landscape Areas will replace AGLVs and Areas of Special Landscape Control. This approach is in accord with best practice and guidance prepared by Scottish Natural Heritage and Scottish Government.

**Alternative approach**

The council's 'Alternative' approach to landscape designations is to continue with the current approach, relying on existing policies and designations. This would not achieve the goal of updating and simplifying landscape designations in accordance with current best practice and national guidance.

**Question 51**

Do you agree with the 'Preferred' approach to landscape designations in West Lothian?  
If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 52**

Do you agree with the 'Alternative' approach to landscape designations in West Lothian?  
If not, why not?

YES     NO     Don't know

Do you have any additional comments?

### Question 53

Do you have an alternative approach?

What is it and how would you make it work?

YES     NO     Don't know

Do you have any additional comments?

Development in the countryside (*paragraphs 3.180 – 3.181*)

#### **Preferred approach**

The council's 'Preferred' approach to housing development in the countryside is to continue to support development in appropriate circumstances for example, sensitive redevelopment of steadings; limited enabling development to secure restoration of historic buildings or structures; and replacement of houses in a habitable condition. Existing Supplementary Guidance will be updated to clarify the circumstances in which development will be permitted, and the design standards expected. The current flexibility in policies on business and tourism development in the countryside will be maintained and it is proposed to carry forward the existing policy on 'very low density rural housing in the countryside' otherwise known as 'lowland crofting' but only in the west of West Lothian.

#### **Alternative approach 1**

The council's first 'Alternative' approach to housing development in the countryside is to allow relaxations to current policies, potentially by permitting more redevelopment of rural brownfield land for housing. However, this approach is inherently non-sustainable as it would result in development which is remote from services and could lead to a proliferation of undesirable, sporadic development in the countryside.

#### **Alternative approach 2**

The council's second 'Alternative' approach to housing development in the countryside is not to maintain the current policy approach. This would include a review of the current 'lowland crofting' policy.

### Question 54

Is the 'Preferred' approach to housing development in the countryside appropriate?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 55**

Do you agree with any of the 'Alternative' approaches to housing development in the countryside?

YES     NO     Don't know

Do you have any additional comments?

**Question 56**

Do you have an alternative approach?

What is it and how would you make it work?

YES     NO     Don't know

Do you have any additional comments?

Business, tourism and recreational uses in the countryside (*paragraph 3.182*)

***Preferred approach***

The council's 'Preferred' approach to business, tourism and recreational uses in the countryside is to generally continue with the current policy approach set out in existing supplementary guidance.

***Alternative approach***

The council's 'Alternative' approach to business, tourism and recreational uses in the countryside is to allow relaxations to current policies. However, this approach could lead to a proliferation of undesirable development in the countryside.

**Question 57**

Do you agree with the 'Preferred' approach to business, tourism and recreational uses in the countryside?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?



**Question 58**

Do you agree with the 'Alternative' approach to business, tourism and recreational uses in the countryside?  
If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 59**

Do you have an alternative approach?  
What is it and how would you make it work?

YES     NO     Don't know

Do you have any additional comments?

Green Networks, and extension to Pentland Hills Regional Park (*paragraphs 3.183 – 3.189*)

**Preferred approach**

The council's 'Preferred' approach to the green network is to define the part of CSGN in West Lothian as a network of multi-functional green corridors focussing on the existing network. This would build on the existing initiatives extending the network into the rural hinterland to connect with adjacent local authorities existing and emerging networks, and penetrating into urban areas, linking with the council's Open Space Strategy and Core Paths Plan.

**Alternative approach**

The council's 'Alternative' approach to the green network is to maintain the existing green spaces in their present form, with a clear urban fringe focus. This would continue to prioritise resources closest to the places people live and work, but would fail to capture the wider focus of the CSGN to link existing and new green spaces into wider multi-functional green networks.

**Question 60**

Do you agree with the 'Preferred' approach to the green network in West Lothian?  
If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 61**

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

YES     NO     Don't know

Do you have any additional comments?

**Question 62**

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

YES     NO     Don't know

Do you have any additional comments?

**Question 63**

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

YES     NO     Don't know

Do you have any additional comments?

**Question 64**

Do you have an alternative approach? What is it and how would you make it work?

YES     NO     Don't know

Do you have any additional comments?

**Question 65**

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

YES     NO     Don't know

Do you have any additional comments?

Biodiversity and Geodiversity (*paragraphs 3.190 – 3.197*)

**Preferred approach**

The council's 'Preferred' approach to biodiversity and geodiversity sites is to review and update the existing list of locally designated sites (Wildlife Sites and Regionally Important Geological/Geomorphological Sites RIGS) and to protect and promote improvements to them through Supplementary Guidance where appropriate. Policy protection for carbon-rich soils will be reinforced.

**Alternative approach**

The council's 'Alternative' approach to biodiversity and geodiversity sites would be not to promote Supplementary Guidance, but simply to map local sites within the LDP as at present. Whilst this might give the sites more prominence within the LDP, the process would be less functional.

**Question 66**

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

YES     NO     Don't know

Do you have any additional comments?

**Question 67**

Do you agree with the 'Preferred' approach to Biodiversity and Geodiversity in West Lothian?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 68**

Do you agree with the 'Alternative' approach to Biodiversity and Geodiversity in West Lothian?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 69**

Do you have an alternative approach?

What is it and how would you make it work?

YES     NO     Don't know

Do you have any additional comments?

*West Lothian Open Space Strategy 2005-2015 (paragraph 3.198)*

**Question 70**

Do you have any views on what should be considered for the second Open Space Strategy for 2015/16?

Why should these be considered?

YES     NO     Don't know

Do you have any additional comments?

**Preferred approach**

The council's 'Preferred' approach to the historic environment is to review the current range of policies related to the historic environment, updating where necessary to reflect changes in legislation, and to prepare supplementary guidance to protect and promote built heritage assets and to consider designating conservation areas at Abercorn village and Hopetoun Estate. In addition, conservation area appraisals of all conservation areas will be progressed where resources allow.

**Alternative approach**

The council's 'Alternative' approach to the historic environment is to maintain the current approach to the historic environment and not to promote a conservation area at Abercorn village and Hopetoun Estate.

**Question 71**

Is the 'Preferred' approach to the historic environment in West Lothian appropriate?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 72**

Do you agree with the 'Alternative' approach to the Historic Environment in West Lothian?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 73**

Do you have an alternative approach?

What is it and how would you make it work?

YES     NO     Don't know

Do you have any additional comments?

**Preferred approach**

The council's 'Preferred' approach to Bangour Village Hospital site is to support at least 550 houses at the site, with the precise number of houses being agreed through detailed assessment of a master plan and other supporting information. Delivery of the site will be allied to the delivery of the infrastructure required to support the development whilst having regard to the built and natural environmental sensitivities of the site.

**Alternative approach**

The council's 'Alternative' approach is that housing development at the Bangour Village Hospital site should be restricted to 500 units.

**Question 74**

Is the 'Preferred' approach to Bangour Village Hospital appropriate?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 75**

Do you agree with the 'Alternative' approach to Bangour Village Hospital?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 76**

Do you have an alternative approach?

What is it and how would you make it work?

YES     NO     Don't know

Do you have any additional comments?

**Preferred approach**

The council's 'Preferred' approach to the former Bangour General Hospital site is to assess development proposals against development in the countryside policies in the LDP.

**Alternative approach**

The council's 'Alternative' approach to the Bangour General Hospital site is to maintain the policy presumption in favour of development as set out in the *West Lothian Local Plan*.

**Question 77**

Is the 'Preferred' approach to Bangour General Hospital appropriate?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 78**

Do you agree with the 'Alternative' approach to Bangour General Hospital?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 79**

Do you have an alternative approach?

What is it and how would you make it work?

YES     NO     Don't know

Do you have any additional comments?

**Preferred approach**

The council's 'Preferred' approach to the Union Canal is to promote its tourism and recreational potential and to allow for sympathetic ancillary development at the most appropriate locations along its length, having regard as to how this best fits with the wider strategy being developed by Scottish Canals for the whole waterway and in consultation with other neighbouring local authorities.

The canal also has potential to be used as a means of sustainable transport, both for leisure and commercial purposes, and it is important that opportunities to enhance local use, access and bio-diversity are maximised.

Securing the long term maintenance of this important historic structure is also paramount and it is concluded that this is best achieved by ensuring that it is well used and has as diverse a range of functions as practicable.

The rural setting of the section of the Union Canal between Winchburgh and Broxburn should continue to be protected as countryside belt or as a candidate special Landscape Designation Area as identified in the draft Local Landscape Designation Review.

**Alternative approach**

The council's 'Alternative' approach to the Union Canal is that no development, on or directly abutting it, and particularly in the countryside between Broxburn and Winchburgh, should be permitted. This is considered necessary in order to maintain the established setting of the Union Canal and to conserve its historic fabric. The only concession would be for necessary maintenance or for works to improve the canal and public access to it.

**Question 80**

Is the 'Preferred' approach to the Union Canal appropriate?  
If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 81**

Do you agree with the 'Alternative' approach to the Union Canal?  
If not, why not?

YES     NO     Don't know

Do you have any additional comments?



**Question 82**

Do you have an alternative approach?  
What is it and how would you make it work?

YES     NO     Don't know

Do you have any additional comments?

Public Art (*paragraph 3.213*)

**Preferred approach**

The council's 'Preferred' approach to public art is to continue to seek developer contributions appropriate to the scale and type of development and to review supplementary guidance.

**Alternative approach**

The council's 'Alternative' approach to public art is to cease requiring developer contributions for public art or to limit the circumstances under which contributions are required.

**Question 83**

Do you agree with the 'Preferred' approach to public art?  
If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 84**

Do you agree with the 'Alternative' approach to public art?  
If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 85**

Do you have an alternative approach?

What is it and how would you make it work?

YES     NO     Don't know

Do you have any additional comments?

**Main Issue 7: Climate Change and Renewable Energy (paragraphs 3.214 - 3.225)**

How can future patterns of development in West Lothian increase climate resilience and contribute towards meeting Scottish Government targets for reducing greenhouse gas emissions and increasing renewable energy?

**Preferred approach**

The council's 'Preferred' approach for renewable energy is to retain the supportive policy framework for renewable energy developments, extending it to all low carbon energy technologies and implement the terms of supplementary guidance for wind energy developments.

**Alternative approach**

The council's 'Alternative' approach for renewable energy is to retain the current criteria-based wind energy policy, without the support of a spatial framework. This is not considered to provide the necessary guidance for landowners or the industry, as required by Scottish Government and would not be in accordance with current best practice, Scottish Planning Policy and guidance.

**Question 86**

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

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 87**

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

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 88**

Do you have an alternative approach?

What is it and how would you make it work?

YES     NO     Don't know

Do you have any additional comments?

Flood risk and management (*paragraphs 3.226 – 3.229*)

**Preferred approach**

The council's 'Preferred' approach to flood risk is to maintain and update existing policies and supplementary guidance on flood risk, taking account of legislative requirements and emerging Scottish Government guidance, including the RBMP as appropriate.

**Alternative approach**

The council's 'Alternative' approach to flood risk is to go beyond requirements and identify and protect areas of land for natural flood management as this will be a consideration in the new management plans.

**Question 89**

Do you agree with the 'Preferred' approach to flood risk appropriate?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 90**

Do you agree with the 'Alternative' approach to flood risk?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 91**

Do you have an alternative approach?

What is it and how would you make it work?

YES     NO     Don't know

Do you have any additional comments?

Air quality and noise (*paragraphs 3.230 – 3.232*)

**Preferred approach**

The council's 'Preferred' approach to air quality is to maintain and update existing policies on air quality, taking account of legislative requirements and any emerging Scottish Government guidance.

**Alternative approach**

There are no reasonable alternatives to the preferred approach.

**Question 92**

Do you agree with the 'Preferred' approach to air quality appropriate?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 93**

Do you have an alternative approach?

What is it and how would you make it work?

YES     NO     Don't know

Do you have any additional comments?

**Main Issue 8: Minerals and Waste** (paragraphs 3.233 – 3.246)

How can planning policy promote and ensure sustainable approaches to waste management and mineral resources in West Lothian?

Minerals (paragraphs 3.233 - 3.242)

**Preferred approach**

The council's 'Preferred' approach towards mineral extraction is to continue to implement the policy approach set out in the SDP and the adopted WLLP. The policy approach set out in these will however, be reviewed to take account of the guidance contained within SPP. This may be pursued through supplementary planning guidance.

**Alternative approach**

The council's alternative approach towards mineral extraction is to take a more liberal approach to opencast coal and hard rock extraction by widening the opencast coal "broad areas of search" and identifying the whole of West Lothian as an area of search for other minerals to be extracted, subject to environmental and residential amenity considerations and constraints, by identifying these areas and appropriate buffers beyond which the search for minerals could take place.

**Question 94**

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

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 95**

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

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 96**

Do you have an alternative approach?

What is it and how would you make it work?

YES     NO     Don't know

Do you have any additional comments?

**Preferred approach**

The council's 'Preferred' approach towards waste management is to support the objectives of the Zero Waste Plan, to accommodate new provision through extensions to existing recycling facilities, or in other suitable areas and to provide a policy framework which supports the development of these facilities.

**Alternative approach**

The council has not identified a reasonable alternative approach to the preferred approach.

**Question 97**

Do you agree with the 'Preferred' approach to waste management?

If not, why not?

YES     NO     Don't know

Do you have any additional comments?

**Question 98**

Do you have an alternative approach?

What is it and how would you make it work?

YES     NO     Don't know

Do you have any additional comments?

## Additional information

Extra page for additional information you want to give on question(s). Please state the question number text refers to.

Further to our responses to questions 12, 15, 19, 38 and 48, we would request that the Council reassess the particular merits of our client's 6.5 hectare site at Seafield Road, Blackburn (part of Site EOI-0136).

Full details of this site are set out in the attached Supporting Planning Statement and accompanying technical reports.

As confirmed in a recent appeal decision, this site is located in an accessible, sustainable location and would not adversely impact on any sensitive environmental, landscape, townscape or biodiversity areas and would not lead to coalescence. It can therefore be released for new housing development in line with SESplan Policy 7.

We would therefore request its removal from the existing countryside designation and its allocation in the Proposed LDP as a new housing site with capacity for 120 units.

We would also welcome the opportunity to review this site with the Council's Planning Officers prior to the preparation of the Proposed LDP.





October 2012



# Design Statement

## Land at Blackburn, West Lothian

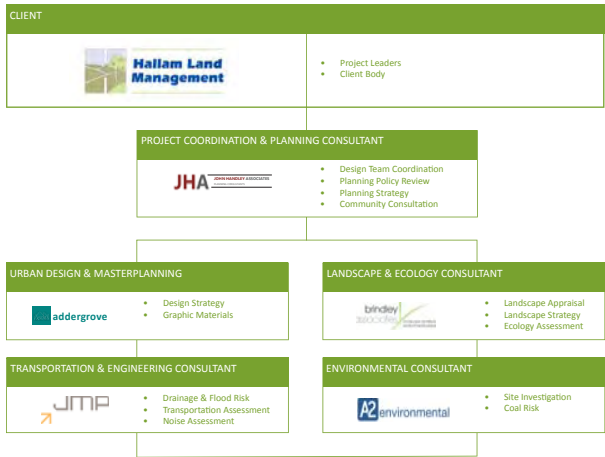
Proposed Development of Land at Seafeld Road, Blackburn, West Lothian  
on Behalf of Hallam Land Management Ltd.





# CONTENTS

- 1 INTRODUCTION
- 2 SITE LOCATION
- 3 SITE CONTEXT PHOTOGRAPHS
- 4 SITE PHOTOGRAPHS
- 5 SITE DESCRIPTION
- 6 SITE INVESTIGATION
- 7 DESIGN PRINCIPLES
- 8 INDICATIVE MASTERPLAN
- 9 CONCLUSION



This Design Statement has been prepared by Urban Design practice, Addergrove Design, on behalf of Hallam Land Management Ltd. The document has been created in support of an application for Planning Permission in Principle for the development of approximately 120 dwelling houses on land adjoining Blackburn, West Lothian and sets out the design principles and access arrangements for the proposed development.

The purpose of this document is to provide West Lothian Council with an overview of the potential present in the site, and how best practice, adopted early in the design process, can unlock this and help form the foundations for a successful new housing development that is well integrated into the surroundings, respects the local character and setting and yet has its own character and identity.

On this basis an illustrative conceptual masterplan has been created which highlights the proposed development pattern and relationship to the immediate and wider local area.

This Design Statement has been prepared in conjunction with Landscape and Ecology Consultants, Brindley Associates, Chartered Town Planning Consultants, John Handley Associates, JMP Consulting Engineers and A2 Environmental Consultants. The Design Statement has been informed by the drainage and flood risk assessment, ecological assessment, landscape appraisal, ground conditions & coal risk, noise assessment, transport assessment and supporting planning statement, resulting in a design proposal which is effective, responsive and of the highest quality.

Consultant team structure



Location of site in relation to Blackburn & Seafield

The site is located on the eastern side of Blackburn, West Lothian on the A705 (Seafield Road) and covering a total area of 6.5 Hectares (16 acres) with a high point of 162 metres in the north and a low point of 155 metres to the south.

Blackburn itself was established as a small industrial town historically focussing on cotton manufacturing and coal mining, with a current population of approximately 4750. The M8 motorway lies on the northern periphery of Blackburn, with the town of Bathgate just beyond this. The proximity to the M8 provides good linkages to the wider road network and areas of employment, and is within commuting distance of both Edinburgh and Glasgow. The town of Livingston is situated only 5 miles to the east of Blackburn, with further employment, retail and leisure opportunities.

Further to the nearby motorway, railway stations are also present at Bathgate, Addiewell and Livingston. An extensive bus network is also available in the area, providing the proposed site with a comprehensive sustainable transport network. A dedicated footpath / Cycleway links the northern edge of Blackburn to Livingston and runs close to the northern boundary of the proposed site.

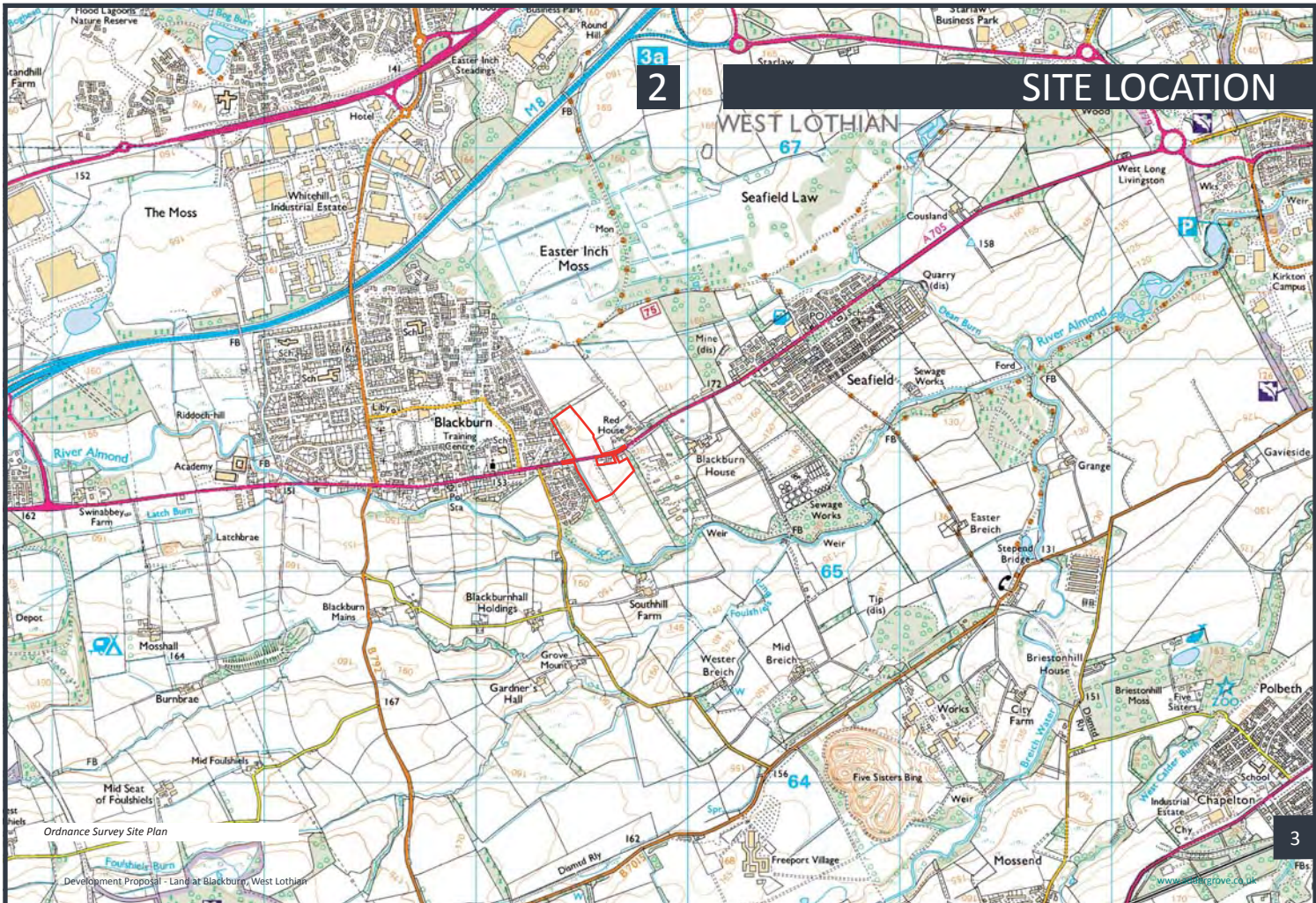
The land between Blackburn and the village of Seafield to the east is mainly agricultural land with a number of residential properties scattered in clusters along the A705. Further to the north, between the proposed site boundary and the M8 is an area of former peat extraction known as Seafield Moss, to the south lies the River Almond.

Existing built form in the neighbouring area comprises mostly 1 to 2 storey detached dwellings, with a few terraced residences, there are a number of housing blocks of between 3 and 5 storeys to the far north of Blackburn at Beechwood Road, adjoining the M8 motorway.



# SITE LOCATION

3a  
2



Ordnance Survey Site Plan

Development Proposal - Land at Blackburn, West Lothian

[www.seagrave.co.uk](http://www.seagrave.co.uk)





Aerial Photographs of proposed site.

## Blackburn Area



1



2



3



4



5



6



7



8

# 3

## SITE CONTEXT PHOTOGRAPHS



1. St. Kentigerns School - entering Blackburn from the east
2. The Mill Shopping Centre on Bathgate Road
3. Junction of Bathgate Road and East Main Street
4. A792 Bathgate Road looking South
5. A792 Bathgate Road looking South (Turf Road Junction)
6. Ash Grove looking north
7. A705 in Seafield looking East
8. A705 in Seafield looking East

## Site Perimeter



9



10



11



12



13



14



15



16

# 3

## SITE CONTEXT PHOTOGRAPHS



- 9. A705 looking east towards site
- 10. A705 looking west towards Blackburn
- 11. Pinewood Place looking east (site behind)
- 12. Pinewood Place looking south east (site to left)
- 13. Elm Place looking east towards cycle path at rear of site
- 14. Happy Valley Road
- 15. Blackburn House Equestrian Centre
- 16. Looking west towards entrance to Woodlea



## Site Photographs



17



18



19



20



21



22

## 4

## SITE PHOTOGRAPHS



- 17. Footpath connection to west of site
- 18. Informal footpath along western site boundary buffer zone
- 19. Looking north over site
- 20. Western edge of site looking north
- 21. Eastern section of site looking north
- 22. Eastern section of site looking north west towards Blackburn in distance



*Detailed Site survey of existing site.*

The application site is located on the eastern side of Blackburn and is bisected by the A705 (Seafield Road) which travels on an east / west axis, dividing the proposed site into 2 sections, one to the north covering an area of 3 Hectares (7.4 acres) and one to the south covering 3.5 Hectares (6.4 acres). Both areas of the site are proposed to be directly accessed off the A705 Seafield Road via a new roundabout.

The northern site is defined by the A705 (Seafield Road) to the south, residential developments on Graham Court and Pinewood Place to the west, existing field boundaries and landscape structure to the north and existing farm building and associated housing to the east.

In topographical terms, the site sits 3 metres below Seafield Road on the southern boundary (156 metres) before rising gently to 159 metres and then flattening out over the northern half of the site. There are a number field drains which join to a culvert which runs under the A705 and then drains down the western edge of the southern site. In Landscape terms, the land comprises agricultural land under a mix of arable production and improved pasture, there is a relatively weak landscape structure of declining hedgerows with trees, remnant shelterbelts and under grazed hedgerow trees in open pasture.

To the south of Seafield Road is the second parcel of land proposed for development, this is defined by existing housing at Happy Valley, partially screened by hedgerow and mature trees, to the west, Seafield Road to the north, existing housing fronting the A705 in the north east corner, a recently established shelterbelt to the east with an 'urban crofting' development beyond. The southern boundary is formed by the northern edge of the River Almond Area of Special Landscape Control.

Topographically, the southern site also sits some 3 metres below the A705 and continues to fall generally in a southern direction towards the River Almond.

The following site investigation comments have been extracted from the associated supporting reports in relation to roads, flooding & drainage, environmental assessment and coal risk, landscape and visual impact, ecology, noise, community consultation and planning statement.

### Transport & Accessibility

Transport Consultants, JMP, have carried out a detailed examination of the traffic generation and distribution for the proposed residential use of the site. The Transport Assessment (TA) provides an overview of the proposed development details, a review of national and local policy related to the site, existing transport provision in the area and future transport proposals relevant to the development.

The TA concentrates on the wider transport impacts of the development in terms of site accessibility issues and provides details of supporting information in terms of the development's impact on the road network and road safety.

The TA has considered the accessibility of the site by all modes of transport including walking, cycling, public transport and by car. The accessibility by all modes is considered to be good, with bus services operating in close proximity to the site linking into Blackburn town centre, Seafield and Livingston.

The development will incorporate 'Designing Streets' principles to ensure that travel by the most sustainable modes are maximised with measures put in place to reduce the necessity for private car trips.

A review of access options for the development have been presented to determine the most suitable access arrangement and the extent of required road safety measures. The proposed mitigation measures to improve the road safety conditions for all road users have been considered and include:

- A new compact roundabout on the A705 between the north and south sites to be designed in accordance with the standards provided in the Design Manual for Roads and Bridges (DMRB), "Designing Streets", and the standards provided in West Lothian Development Guidelines.
- A new pedestrian footway along the south side of the A705 Seafield Road.
- The widening of the existing footway on the north side of Seafield Road along the development frontage.
- New dropped kerbs will be provided to support pedestrian crossing movements from the south site to the footway located on the north side of the A705 Seafield Road.
- Integration of the proposed development with the existing pedestrian network to ensure excellent access to the site for those on foot.

The results of the assessments have shown that the proposed development can be integrated with the existing transport network and vehicular impacts accommodated so that there is no material detriment to existing road users, and could improve the current situation.

The Transport Assessment has shown that the development site is well located for both local and strategic traffic and currently enjoys a good level of accessibility by sustainable modes of transport. The proposed development site is considered suitable for the development proposals.

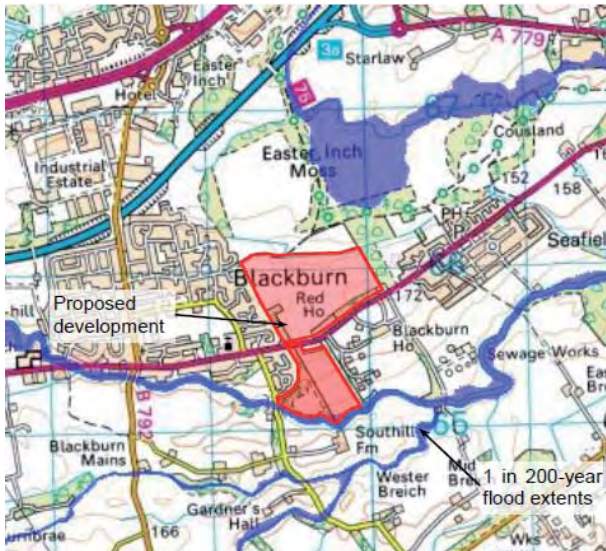
### Flooding & Drainage Assessment

JMP have also conducted a detailed drainage and flooding assessment for the proposed development. This has included consultations with West Lothian Council, SEPA and Scottish Water to define the standards to which the surface water drainage system should comply.

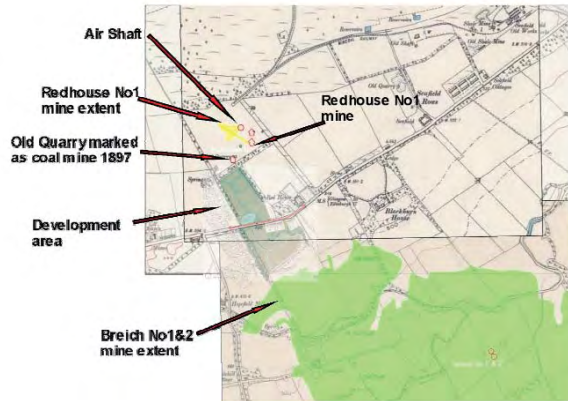
The drainage assessment provides outline proposals for the new development and these have been reflected in the indicative masterplan for the site. Full design of the drainage strategy will be prepared in conjunction with SEPA at the detailed application stage.

JMP have also carried out a flooding assessment for the proposed development site. This includes a high level assessment of the SEPA Flood Map. The work indicates that the site is not within any flood risk areas.

The report has confirmed that the development of the site will deal with any localised flooding arising from the existing field drainage system. JMP have confirmed that any existing land drainage system which may currently drain the un-developed site, will have to be considered during any development of the site. Proposals will have to ensure that the new site buildings are protected from surface flows within the site, and any overland flow is captured and diverted from any existing properties. This could provide a significant improvement on the current situation and will address existing field drainage problems which were raised as part of the local consultation exercise.



1 in 200 year flood risk extents map.



*Historic Mine Locations*

## Environmental Assessment & Coal Risk

The site is located within the Coal Authority West Lothian Coal Mining Development Referral Area. The Coal Authority identifies the site area being within an area where coal resources exist and adjacent land contains areas where probable shallow coal workings exist.

Historic maps indicate that the land immediately to the north of the proposed development area has had a number of small quarries on it; the nearest being approximately 30m to the north. Land approximately 700m east of the development site was historically occupied by the Seafield Artificial Patent Fuel Works at which several mines and quarries extracted coal and oil shales.

The ground conditions underlying the site are anticipated to comprise strata of the West Lothian Oil Shale Formation (pale sandstones, interbedded with grey siltstones and mudstones, seams of oil-shale and of coal with beds of limestone/dolomite and ironstone) with overlying Glacial Till. Localised superficial deposits of alluvium and peat may be present.

A Coal Authority search has been undertaken for the site and this confirms that no recorded mine entries are present within the development area.

Outside the development area, within the neighbouring ownership area land, a number of adits and shafts are present. No records are held as to whether any treatment of these has taken place, however due to the dip of the strata it is not considered likely that these would have extended beneath the subject site.



### Landscape & Visual Impact

It is considered that landscape and visual effects associated with residential development at the land held by Hallam Land Management Ltd will be largely contained within the close vicinity of the site due to the screening provided by existing and mainly residential developments in close proximity to the site boundaries.

Throughout the broader study area the effects upon landscape and visual amenity are considered to be generally negligible as the sites are seen as a small and not significant addition to broader views containing prominent areas of residential development.

Potential adverse effects, which have been identified, relate to those experienced close to the proposed development site, these close receptors are predicted to experience limited effects as the proposed development does not introduce a new element into either views or the landscape character.

Appropriate structure planting can be incorporated on the site boundaries to provide visual integration and a more robust boundary between the urban areas and the adjacent agricultural land than that which currently exists and allow a mature setting for the land holding.



Legend			
	Views		Hedgerow
	Visual focus points		Remnant woodland
	Urban areas		Young shelter belt planting
	Farm buildings on site		Wooded areas along river
	Postpads		Slopes

Landscape and Visual Impact Illustration



Ecology Illustration



## Ecology

It is understood that development is to be largely restricted to parts of the existing arable and improved pasture areas of the site leaving extensive peripheral areas either untouched or available for enhancement. Structure planting designed primarily to enhance the local landscape can also be valuable as a buffer protecting existing habitats, e.g. the River Almond riparian zone, as well as creating new habitats.

Discussion between the landscape architect and ecologist is essential in order that designs can be created using a palette of plant species that will fulfil biodiversity needs as well as good landscape design. Provision for public access should also be integrated sympathetically within the design in order to minimise impacts on biodiversity and potentially sensitive habitats.

Development of the land proposed within the area shown as the application site, being largely arable and improved grassland of minimal ecological value will not result in any significant negative impact on local biodiversity. Development will be restricted to a relatively small area of the land holding affording opportunities for landscape and biodiversity enhancement as well as controlled public access provision. A bat survey will, however, be required but in view of the limited development proposals no other EPS or other protected species are considered necessary at the present time.



Daytime Noise Assessment (external)



Nighttime Noise Assessment (external)



Daytime Noise Assessment (internal)



Nighttime Noise Assessment (internal)

## Noise Assessment

This Preliminary Noise Assessment has been undertaken to establish the noise constraints affecting the proposed development on the site, and to identify potential mitigation measures to address areas where noise exceeds reasonable levels.

The anticipated increase in traffic flows on the A705 is insufficient to trigger assessment of noise levels beyond the site boundary experienced by sensitive receptors.

Potential mitigation measures suitable for inclusion on this site include:

- Designing the site layout such that buildings nearest the noise source form barriers to the propagation of noise further into the development.
- Orientating buildings so they shield garden areas from noise.
- Orientating buildings to place facades with no or few windows, such as a gable end, towards the noise source.
- Designing the internal layout of properties to enable noise sensitive areas to be placed on facades facing away from noise sources.



## Community Consultation

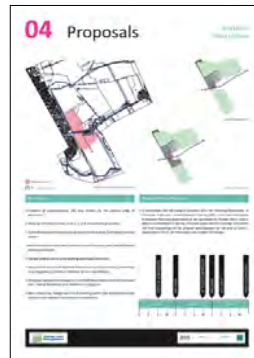
Hallam Land Management and its project team have undertaken a significant level of local community consultation on its proposed housing development at Seafield Road, Blackburn. This was carried out over a period of four months, and was far in excess of the minimum requirements laid out in the consultation regulations.

As recommended, a wide range of tools were used to engage with the key audiences prior to the submission of the formal planning application. The various consultation methods have been summarised in this report, and the feedback received on the draft proposals has been used to inform and amend the development prior to the finalisation of the proposals and the submission of the formal planning application. This has allowed any issues of concern or support for the scheme to be identified and addressed prior to the application submission.

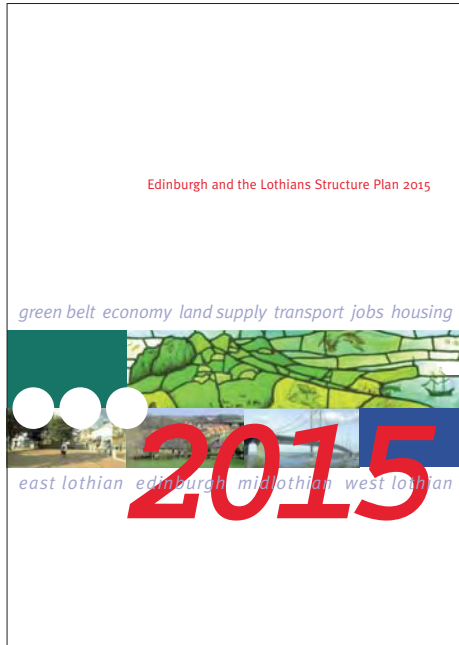
The opinion on the proposals was very mixed with immediately adjacent residents generally opposed to any new development on their boundary. However, the strong and majority view, from wider Blackburn residents supported new housing in Blackburn and particular support for this site which was considered to be a “good location for new family housing”.

There was also significant support for the proposed layout, form, density and approach to development on this site, and recognition of the benefits that could be gained from a high quality housing development such as that being proposed.

In conclusion, the undertaking of the extensive community consultation has provided an opportunity to progress, amend and enhance the indicative proposals for this site prior to the submission of the formal planning application. The indicative layout plans have been informed by feedback received from the adjoining neighbours, the local residents, and the comments received from the Community Council.



Example of materials used in community consultation event



Front cover of Edinburgh & Lothians Structure Plan 2015

## Planning

The Supporting Planning Statement and the accompanying plans and documents have demonstrated that the proposed development can be determined in accordance with the Approved Structure Plan and relevant Local Plan Policy and can be implemented in line with all relevant supplementary planning guidance and best practice on housing design. We have also shown that the application proposals are consistent with emerging strategic policy which acknowledges the benefits of developing new housing sites in this part of West Lothian.

We have confirmed that the application proposals would not conflict with the objectives of Local Plan Policies ENV22 or ENV23 as it is not sporadic development; it would not lead to the coalescence of Blackburn and Seafield; it would respect and reflect the character and scale of existing housing located to the west and east of the site; and would enhance the existing entrance to Blackburn. There is also a locational need for the development as set out in Structure Plan Policies HOU9 and HOU10.

We have demonstrated that the proposal is an appropriate form and design of development for the application site and would sit comfortably within the surrounding area without adversely impacting on the environmental quality, visual or neighbouring amenity, or giving rise to any coalescence concerns. The review of relevant planning policy therefore confirms that the proposal can be considered favourably in terms of relevant national, strategic and local plan policy.

The package of supporting information submitted with the planning application provides a detailed assessment of the proposed development and addresses issues raised during the pre-application consultation, and also the site issues raised at the previous local plan inquiry. These documents therefore provide full justification for the proposals and confirm that there are no technical or physical constraints to developing the site for residential use.

The various site and technical assessments also confirm that there are no adverse environmental impacts arising from the proposed development. This confirms that Planning Permission in Principle can be granted.

In the accompanying technical reports, we have assessed infrastructure capacity – including transport, drainage and education – and these assessments have confirmed that there is sufficient capacity for this scale of development in Blackburn. This confirms the position of the Structure Plan and its recognition that Blackburn has scope to accommodate further growth due to the availability of infrastructure.

In addition, Hallam Land Management has undertaken a detailed landscape and visual impact assessment and design statement which confirms that this site can readily absorb the scale and level of development being proposed.

As required by the Council's Policies, 15% affordable housing will be provided on site and this represents a significant investment in this form of local needs housing.

As well as delivering new local housing, the development will represent a significant level of investment in Blackburn and will provide new employment opportunities for local trades people during the construction of the new development. Hallam Land Management supports local construction workers and can work with local training agencies to provide apprenticeship opportunities during the construction of the development.

One of the main issues raised throughout the local consultations was the need to reduce road speeds on Seafield Road. A detailed Transport Assessment has been undertaken and this has confirmed that the range of road improvements proposed for Seafield Road will address this issue and provide a significant improvement over the existing situation. This will allow the new development to be accessed safely, but will also significantly improve and assist access for existing residents in these locations.

A common theme at all consultation events was the need to ensure an appropriate scale, density and design of development that is appropriate for Blackburn. Hallam Land Management has taken these comments on board and prepared indicative layout plans, landscape plans and a design statement for the proposed development. These confirm the high quality of development being proposed, with a particular focus on the landscaping and layout of the development to accord with these requirements.

One of the main issues raised by neighbouring residents was the existing drainage concerns regarding water run-off from fields into the rear gardens of Graham Court. This matter has been addressed by JMP and is likely to be caused by the existing field drainage system and the topography of the site. This will be fully addressed through the new development which will include a SUDS approach and will improve and resolve this current localised problem. This is confirmed in the drainage report, the design and access statement and the indicative layout plan.

We have demonstrated the appropriateness of the application site and the range of benefits that can be delivered through its development for the proposed level of new housing. We have addressed issues raised during the pre-application consultation, and have responded to concerns raised when the site was promoted for development as part of the last Local Plan.

## Proposed Masterplan

# 7

# DESIGN PRINCIPLES

The proposed indicative masterplan illustrated on the following page has evolved out of the extensive site investigations that have taken place, most notably in ground conditions, roads, landscape and visual impact, drainage, ecology, coal risk, noise and planning.

The physical extent of the proposed development area has been defined by the integration of all these technical studies and as a direct result of the extensive levels of community consultation that have taken place and are outlined in the relevant report accompanying this application.

In overall design terms, the proposed site covers a total area of 6.5 hectares (16 acres) split over two areas, one to the north and one to the south of Seafield Road. A roundabout is proposed at the eastern entrance to Blackburn, providing direct access into the proposed site and providing the dual function of a speed reducing measure to vehicles and a distinctive entrance feature to Blackburn itself.

The development would also be set back from Seafield Road by some 20 metres in the form of a buffer zone to the north and south to provide for a landscaped corridor into Blackburn, integrating existing mature planting with new landscaping, enhancing the edge of the town and providing an attractive setting for new development. A secondary function of this buffer zone is to help mitigate against any noise infiltration into the site from vehicles travelling along Seafield Road.

Of the two parcels of development proposed, the northern site would be composed of 3 hectares (7.4 acres) whilst the south would cover 6.5 hectares (16 acres), and as a direct response to the adjoining residential land uses along the eastern edge of Blackburn, the proposed densities of development would differ accordingly.

The northern site would support a slightly higher density of development, in keeping with the mainly 2 storey detached units present along eastern boundary of Blackburn, whilst the southern site would support a slightly lower density of units, potentially with some single storey housing, as a direct response to the adjoining development at Happy Valley.

In terms of building densities, these would be low in relation to the overall site area, with an average density of 7.5 units per hectare, or 18.4 units per acre. The density would also decrease from west to east and at the northern and southernmost boundaries, providing a low density edge to the development where it meets the adjoining agricultural land. This approach would reduce the visual impact from the east and would provide filtered views in and out of the site.

Both parts of the proposed development will have appropriate structure planting incorporated on the site boundaries to provide visual integration and a more robust boundary between the urban areas and the adjacent agricultural land than that which currently exists and allow a mature setting for the land holding.



**Area Measurements**

**Area 1:** Gross Area : 3Ha (7.4 acres)  
 Approx No. Units = 65  
 Approx density = 8.8 per acre  
 = 21.6 per Ha

**Area 2:** Gross Area: 3.5Ha (8.6 acres)  
 Approx No. Units = 55  
 Approx density = 6.4 per acre  
 = 15.7 per Ha

**Total Gross Site Area:** 6.5Ha (16 acres)  
 Approx No. Units = 120  
 Approx density = 7.5 per acre  
 = 18.4 per Ha

**LEGEND:**

- Existing Main Road
- Proposed SUDS location
- Proposed Open Space
- Proposed Lower Density Housing
- Proposed Higher Density Housing
- Proposed Tree Planting
- Proposed Pedestrian Link
- Existing Power Lines
- Sensitive Boundary Conditions
- Proposed Primary Access Roads
- Existing Drainage
- Proposed Secondary Roads
- Proposed Emergency Access
- Proposed Frontage Direction
- Existing Trees
- Indicative Power Line Wayleave
- Proposed Access Roundabout
- Existing Development Areas
- Proposed Play Areas

0m 20m 40m 60m 80m 100m

Indicative Masterplan



Indicative Masterplan - northern site

#### Northern Site

Looking in greater detail at the northern site we can see how the development area has been clearly defined as a direct response to the local conditions. Existing field boundaries delineate the extent of the proposal together with the existing landscape framework and presence of existing field drains.

The western boundary is proposed to integrate additional structure planting, providing a buffer to the existing development and to the existing watercourse which runs along this boundary.

To the north, the existing copse and remnant woodland would be reinforced to provide a strong landscape framework to the northern edge. Further detail design development would potentially involve the integration of some mitigation measures from any noise as a result of the presence of the M8 motorway further to the north.

On the eastern boundary there would be a stand-off zone from the electricity line running from north to south, the extent of which would be determined at detailed design stage. An existing burn runs in parallel to this, and will be integrated into the wider drainage infrastructure.

The southern boundary incorporates a buffer zone to Seafield Road and the integration of a SUDs pond, the topography of the site dictates that this would be the best location for such a feature, forming part of a comprehensive sustainable drainage system, providing an attractive setting for the development and the entrance to Blackburn as well as being an additional area of habitat for local flora and fauna.

The indicative road network seeks to mirror that which exists at Graham Court and Pinewood place, maintaining the structure and grain present locally, helping to reinforce the local patterns of development.



Indicative Masterplan - southern site

#### Southern Site

The southern site covers an area of 3.5 hectares, a buffer zone would be present along the northern boundary, forming a visually appealing entrance to the development. The existing housing towards the north east running parallel to Seafield Road will benefit from a well designed area of landscaped open space to the rear, also forming a buffer zone to any new development. An emergency access road is also proposed at this location to provide emergency vehicles with a secondary access to the site.

The southern boundary would comprise of single sided development with active frontages overlooking the existing agricultural land and providing an appropriate design response to the edge condition. A series of linear SUDs ponds and structure planting would further enhance this, creating a wildlife corridor and providing an attractive boundary to the proposed development.

Pedestrian linkages to an existing pathway leading to the River Almond are proposed on the western boundary, enhancing the connectivity of the development. Mature trees, existing hedgerows and a burn are present along this boundary, providing a clearly delineated edge to the development proposals.

The indicative road network is proposed to maintain the scale and character of the surrounding residential development, providing a cohesive and coherent structure which also responds to the topographical conditions present.

The general internal layout and orientation of buildings would be designed to maximise the benefits of passive solar gain from the southerly aspect of this site and maximise views.

In summary, this Design Statement fully supports the application for a Planning Permission in Principle for the erection of approximately 120no. High quality dwelling houses on land to the east of Blackburn, West Lothian.

On behalf of our client, Hallam Land Management Ltd. this document has stated the case for the proposed residential development and associated landscaping and has explored the context of the site and its relationship to the local and wider area.

Furthermore, it has illustrated in detail how the design has developed in response to these factors and more site specific matters, and proposed a potential form of development that will respect and enhance its setting.

All of these factors combine to form the basis of a high quality residential development which will create a successful contribution to the built environment.



