

West Lothian Local Development Plan Main Issues Questionnaire

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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 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>

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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?

See separate report 'Housing Land and other matters'

Question 2

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

See separate report 'Housing Land and other matters'

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?

Partly. See separate report 'Housing Land and other matters' with reference to Main Issue 3

Question 4

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

Partly. See separate report 'Housing Land and other matters' with reference to Main Issue 4

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?

See separate report 'Housing Land and other matters'. Include Classes 4, 5 and 6 which are also major employment generators.

Support for the allocation of employment land on site reference EO1-0197

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?

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?

Partly. See separate report 'Housing Land and other matters' which shows a greater need for further new housing allocations above scenario 3 for the reasons given

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?

There is no restriction in government advice to the 'over-supply' of housing land. This is what is recommended in the separate report 'Housing Land and other matters' in view of the grave shortfall in meeting the effective housing land requirement.

Question 19

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

Reference to the current economic climate is not understood. The separate report 'Housing Land and other matters' advocates, amongst other things, releasing all land in Winchburgh in both the preferred and alternative categories as, by definition, this land has been shown to be suitable for development. Further land to the west of Winchburgh adjacent to the preferred site and which displays similar characteristics, is also proposed for release.

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?

But the process should go further and review the effectiveness or likelihood of sites becoming effective in the relevant period and which have been allocated since the finalised West Lothian Local Plan was published but which have no planning consent. Other difficulties include failure to provide a joint masterplan and achieve joint infrastructure provision with Winchburgh

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?

The process should go further and review the effectiveness of sites which have been allocated since the finalised West Lothian Local Plan was published but which have no planning consents and have other known difficulties

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?

See answer to question 20 and to references in the separate report 'Housing Land and other matters'.

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?

Refer to the separate report 'Housing Land and other matters' and the report prepared on behalf of Aithrie Estates and the Hopetoun Estate Trust. The argument in paragraph 3.75 of the MIR is not accepted. Additional land should be allocated in the Winchburgh area. Additional land should be allocated for early development over and above what is identified in the MIR. The lack of progress in East Broxburn, a part of the CDA, provides further justification.

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?

This representation proposes that site references 0199 (part), 0201, 0202, 0203, and 0193 should all be allocated for development within the Plan period and that site 0194 should be shown for development in the longer term as a substitute for the inclusion of site 0193 for earlier release. The site 0194 would make a logical extension to site 0193. There is nothing in the SEA which would preclude its identification. Reference is made to the potential for rehabilitation of Niddry farm steadings.

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?

See accompanying report 'Housing Land and other matters' which refers to the important qualification of support in relation to ND secondary school capacity with regard to the committed development at Winchburgh. No substantial new housing can be permitted until, firstly WLC finally establish what is the spare capacity at its schools and secondly, the new ND secondary school is provided in Winchburgh

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?

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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?

The proposals in answer to question 25 will assist in providing further funds as a contribution towards meeting education requirements

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?

Partly. With reference to the presently designated 'Countryside Belt', the attached reports 'Non-allocation of land at South Winchburgh / proposed adjustment to East Broxburn Core Development area boundary', the Open report 'Winchburgh Southerly Expansion' and the report on behalf of Aithrie Estates and Hopetoun Estate Trust proposes a change to the boundary to the south and west of the settlement and to the north of site CDA WW. The proposal to review the Countryside Belt policy is supported.

CDA

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?

Neither the current nor alternative policies addresses the issue of small settlements such as Newton and Threemiletown. New development in some villages could be beneficial and lead to more sustainable locations being created either individually or in combination with others. Blanket designation as countryside is a negative control which fails to address issues of facilities and services in such communities.

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?

See answer to question 59

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?

As noted in answer to question 56, smaller villages, while shown as 'countryside', might well be able to accommodate housing but also business, tourism and recreational uses, thus further advancing the prospects of achieving sustainable development

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?

The reference to the countryside belt should acknowledge that this policy is to be reviewed. It should also acknowledge that the approved master plan for Winchburgh indicates the location for longer term development to the south and west of the settlement. It is somewhat disingenuous not to refer to the extensive canal-side development proposed in Site CDA WW and to draw a favourable distinction with

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?

cont:

the proposed new land proposed in the attached report 'Housing Land and other matters' and in answer to question 25.

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.

Support is given to the accompanying report 'Housing Land and other matters' and its comments on the LDP background paper and the housing land position statement in the context of HLA 13. Support is given to the section dealing with the failure to maintain an effective housing land supply at all times

Support is given to the accompanying paper 'Housing Land and other matters', its reference to phasing and to its proposed solution, but with the addition of site 0194 as a longer term release as noted in answer to question 25. Support is also given to the section dealing with Green Networks and landscape character classification.

Support is given to the separate paper referred to in answer to question 48 and the landscape study for S Winchburgh to which it refers



Aithrie Estates and Hopetoun Estate Trust

**West Lothian Local Development Plan
Main Issues Report**

Winchburgh

Representations - October 2014

- Sites:
- 0193
- 0194
- 0201
- 0202
- 0203



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architects interiors

contents

- Options
- Opportunities
- Site 0193
- Site 0194
- Site 0201
- Site 0202
- Site 0203
- Combined Sites
0201/0202/0203
- Combined situation
- Team



options

site 0193 – 22.7 hectares

- Net Development Area of 14 hectares
- Lower Rural densities – 300 homes

site 0194 – 11.5 hectares

- Net Development Area of 8.5 hectares
- Lower Rural Densities – 185 homes

site 0201 – 9.4 hectares

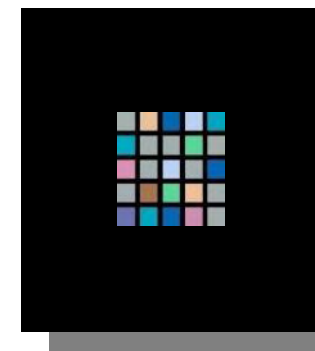
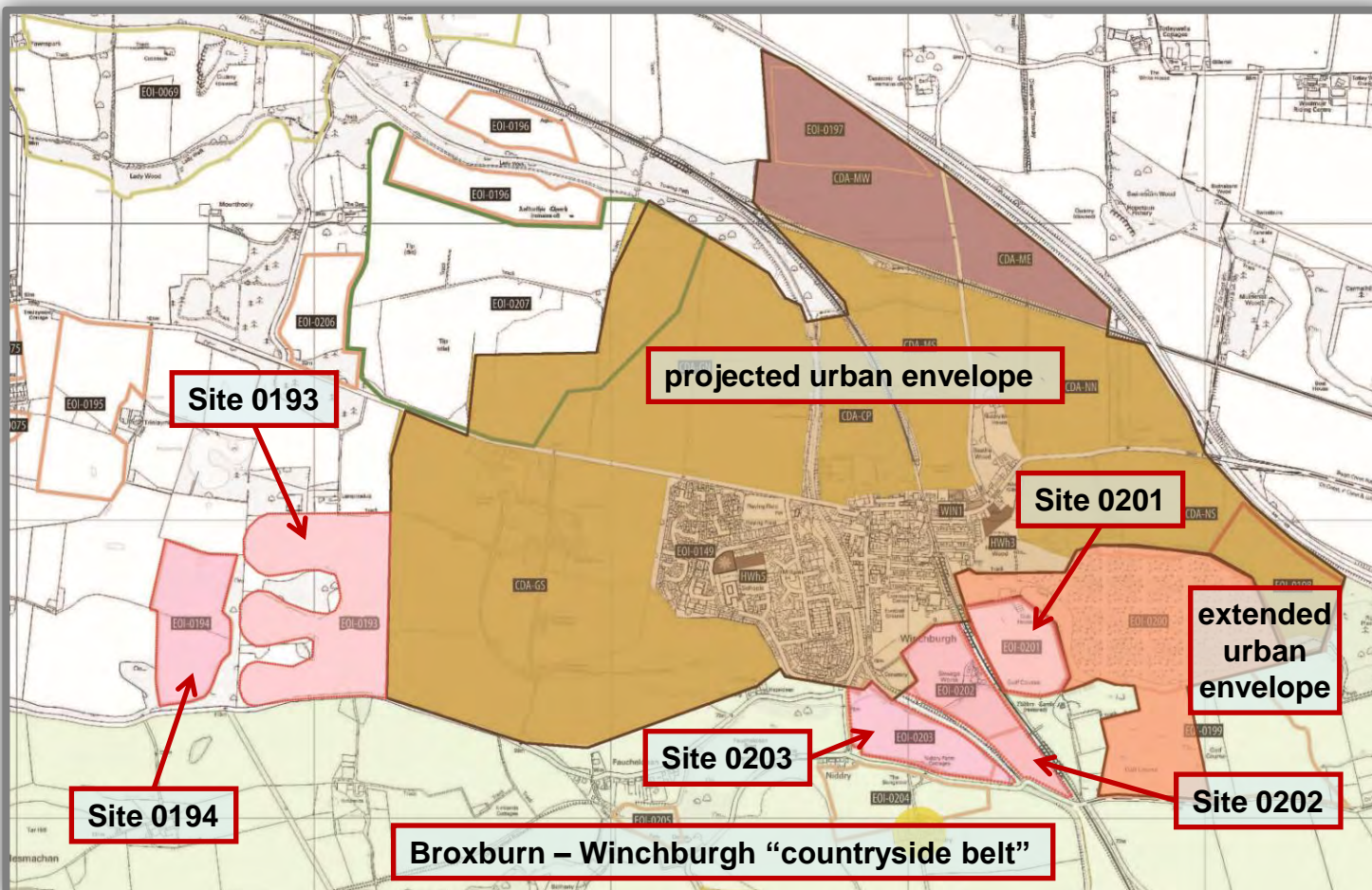
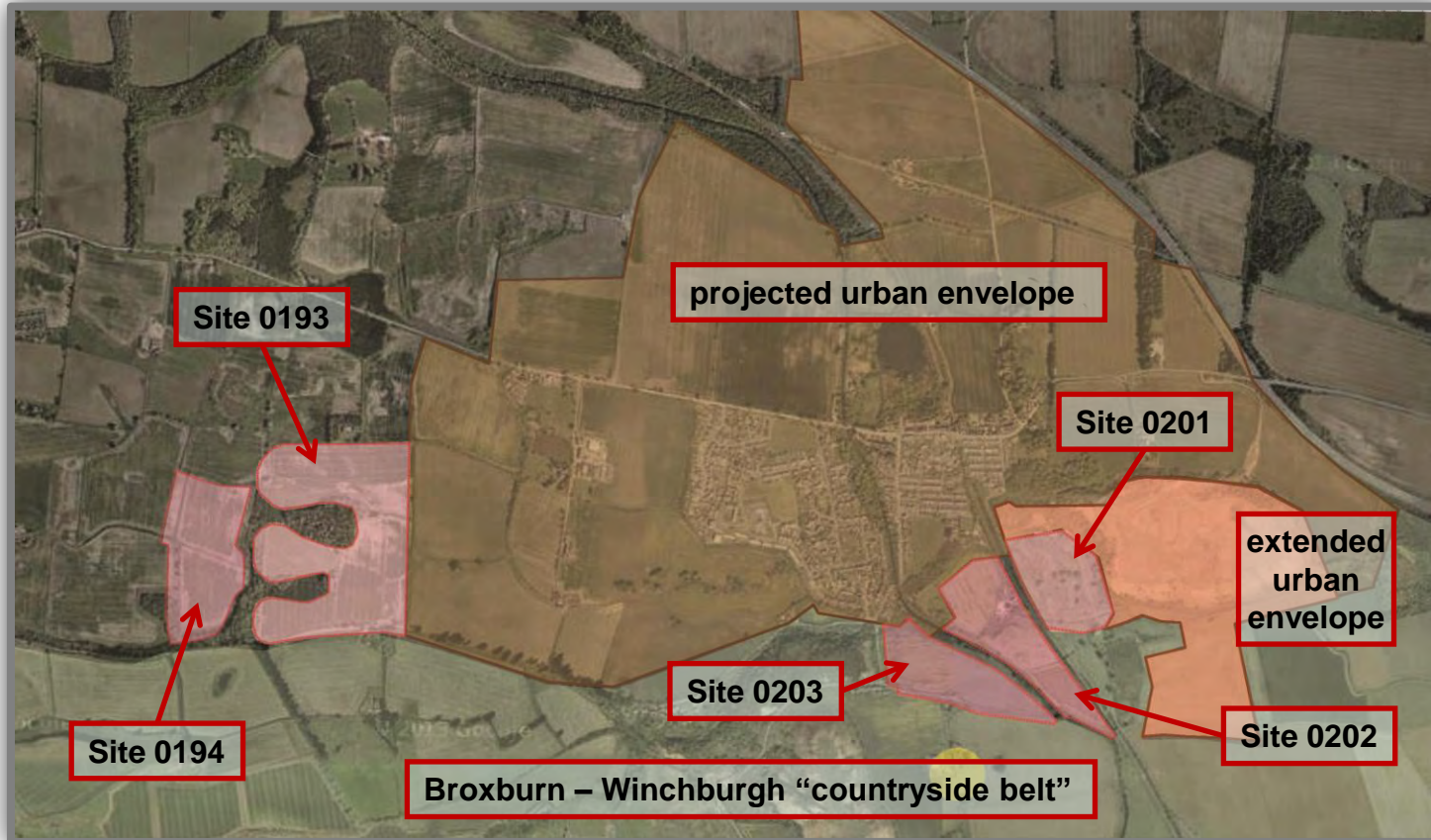
- Net Development Area of 6.6 hectares
- Medium density – 200 homes

Site 0202 – 7.2 hectares

- Net Development Area of 5 hectares
- Medium/Higher Densities – 190 homes

Site 0203 – 7.9 hectares

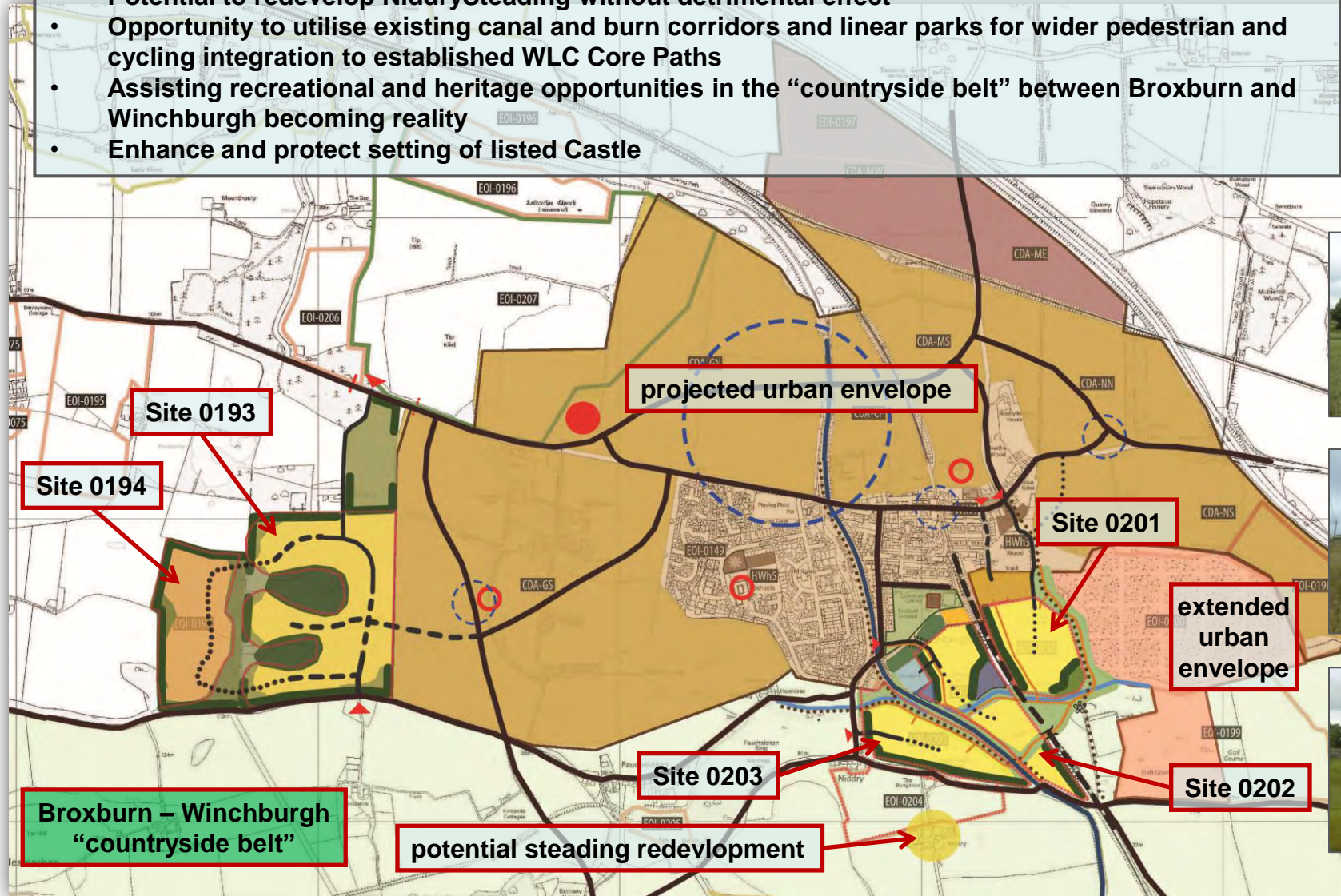
- Net Development Area of 6 hectares
- Lower Rural densities – 130 homes



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opportunities

- Natural extension west, south and east of agreed urban envelope in line with approved Winchburgh Development Masterplan
- Opportunity to integrate and concentrate higher density development closer to existing amenities, and lower density development in more peripheral rural settings
- Sustainable - convenient location to all existing and proposed services and amenities
- Sustainable – convenient location to all existing and proposed public transport routes
- Potential enhancement of existing community facilities
- Potential extension to Cemetery with new safe access
- Potential improvement and relocation of allotments
- Potential to redevelop Niddry Steading without detrimental effect
- Opportunity to utilise existing canal and burn corridors and linear parks for wider pedestrian and cycling integration to established WLC Core Paths
- Assisting recreational and heritage opportunities in the “countryside belt” between Broxburn and Winchburgh becoming reality
- Enhance and protect setting of listed Castle

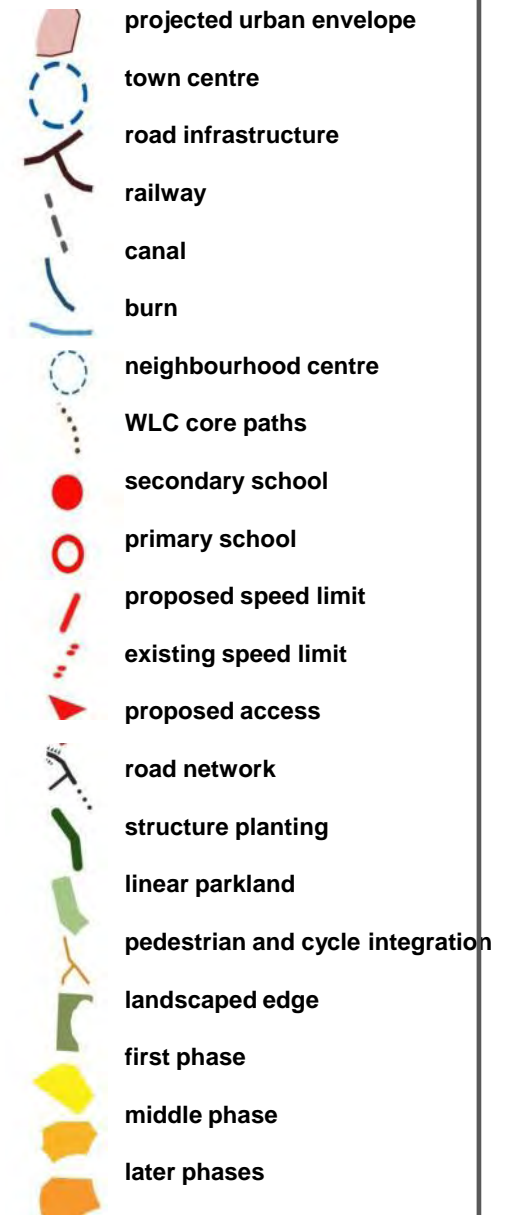
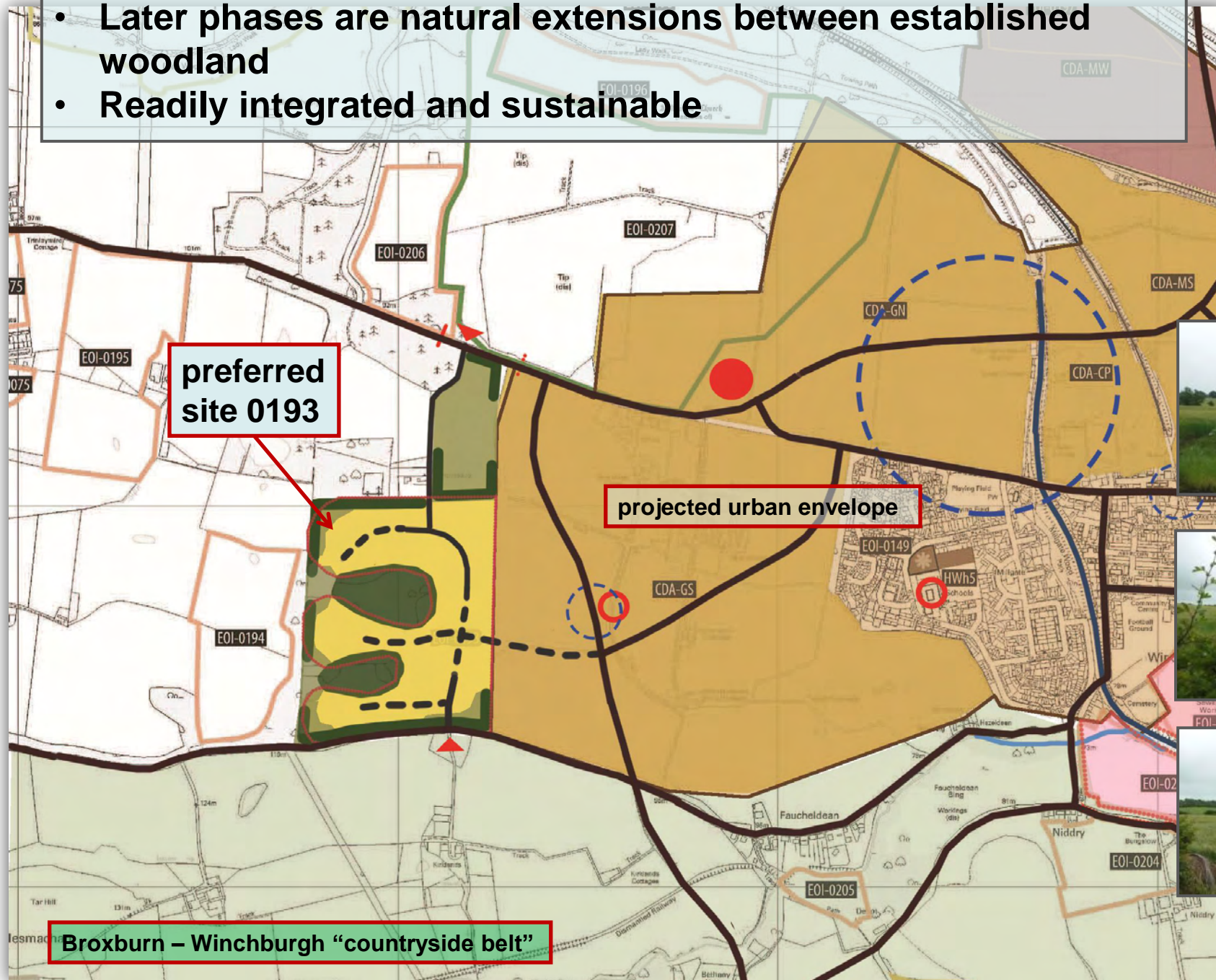



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- Natural westward expansion of agreed urban envelope
- Early first phase possible
- Second phase follows after road link
- Later phases are natural extensions between established woodland
- Readily integrated and sustainable

preferred site 0193

22.7 hectares - Net Development Area of 14 hectares
Lower Rural densities – 300 homes



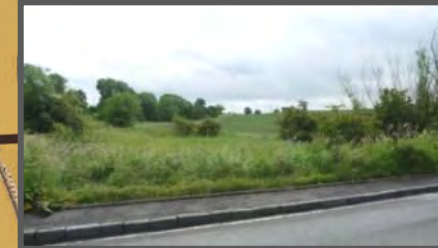
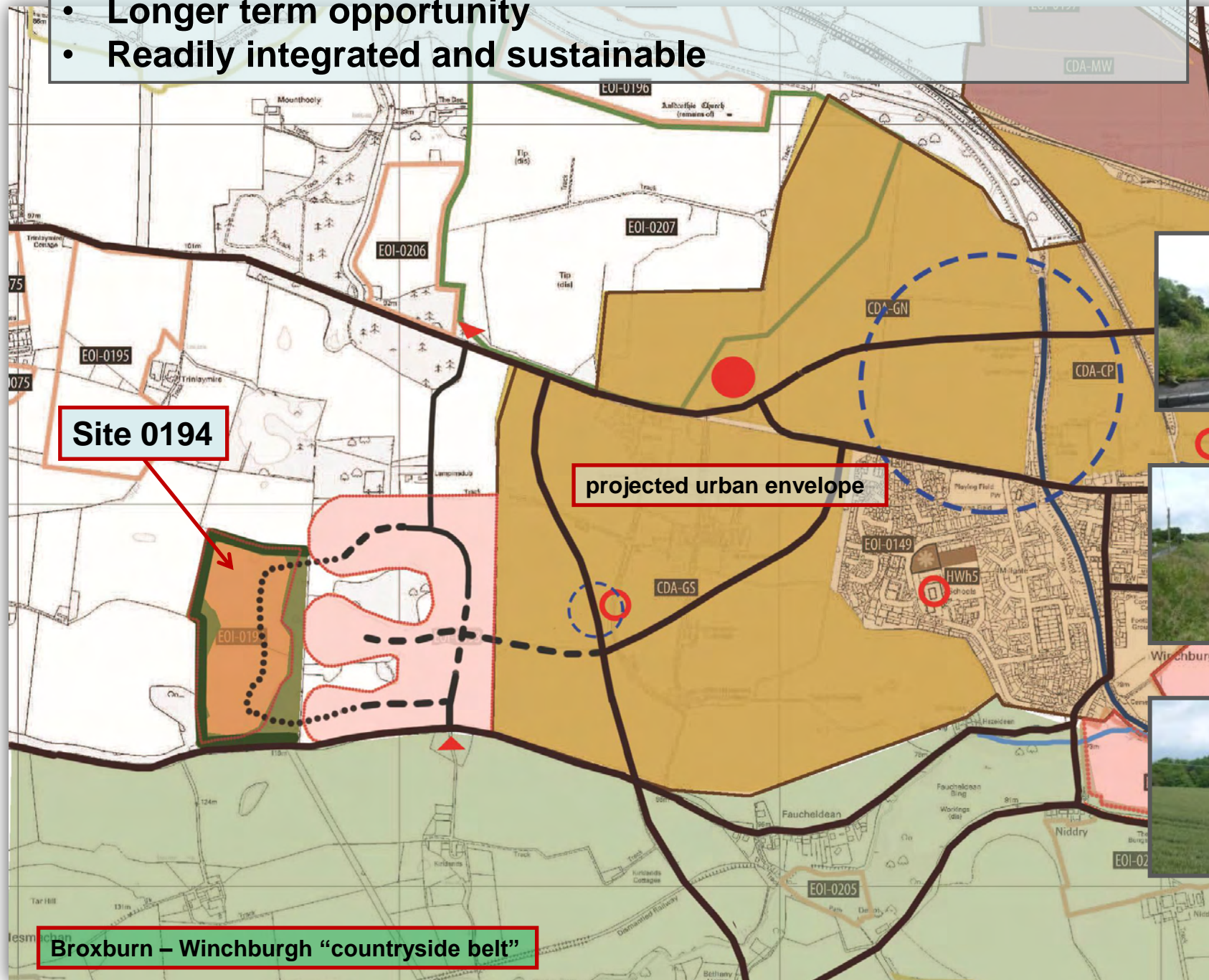
Transportation and Access: the sites form an extension to the western extent of Winchburgh and ground is contractually available to form access links with the main Winchburgh site to the east. However, even in the absence of this link, two further access options exist to the north and south of the site. The access to the north would tie into the B9080 Threemiletown to Winchburgh road where adequate sightlines currently exist. This road is also home to First's flagship 38 bus service offering connections with Linlithgow / Falkirk / Stirling and Edinburgh. Taking access here would afford an opportunity to create a gateway on the eastbound approach to Winchburgh which would serve to lower vehicle speeds before entering what is fast becoming the new urban limit. A further alternative access opportunity is also available onto the Faucheldean road to the south where, again, adequate visibility exists. This current road is more rural in character offering opportunities for informal recreation particularly for cyclists. The site therefore has three connection opportunities, all of differing character although the masterplanning of the area should be careful to avoid the creation of any 'rat run' opportunities via the site.



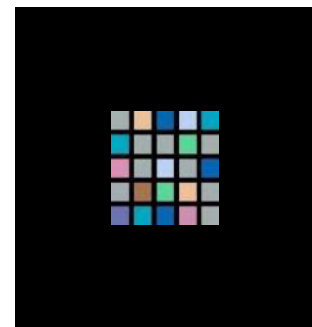
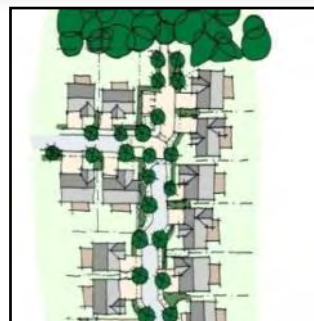
site 0194

11.5 hectares - Net Development Area of 8.5 hectares
Lower Rural densities – 185 homes

- Natural westward expansion of agreed urban envelope
- Longer term opportunity
- Readily integrated and sustainable



- projected urban envelope
- town centre
- road infrastructure
- railway
- canal
- burn
- neighbourhood centre
- WLC core paths
- secondary school
- primary school
- proposed speed limit
- existing speed limit
- proposed access
- road network
- structure planting
- linear parkland
- pedestrian and cycle integration
- landscaped edge
- first phase
- middle phase
- later phases



site 0201

9.4 hectares - Net Development Area of 6.6 hectares
 Medium Density – 200 homes

- Natural extension south and east of existing urban envelope
- Sustainable - convenient location to all existing and proposed services and amenities
- Sustainable – convenient location to all existing and proposed public transport routes
- First phases accessible off Castle Road
- Alternative access enables complete development of allocated site and area beyond
- Enhance and protect setting of listed Castle
- Readily integrated into established WLC Core Pathways

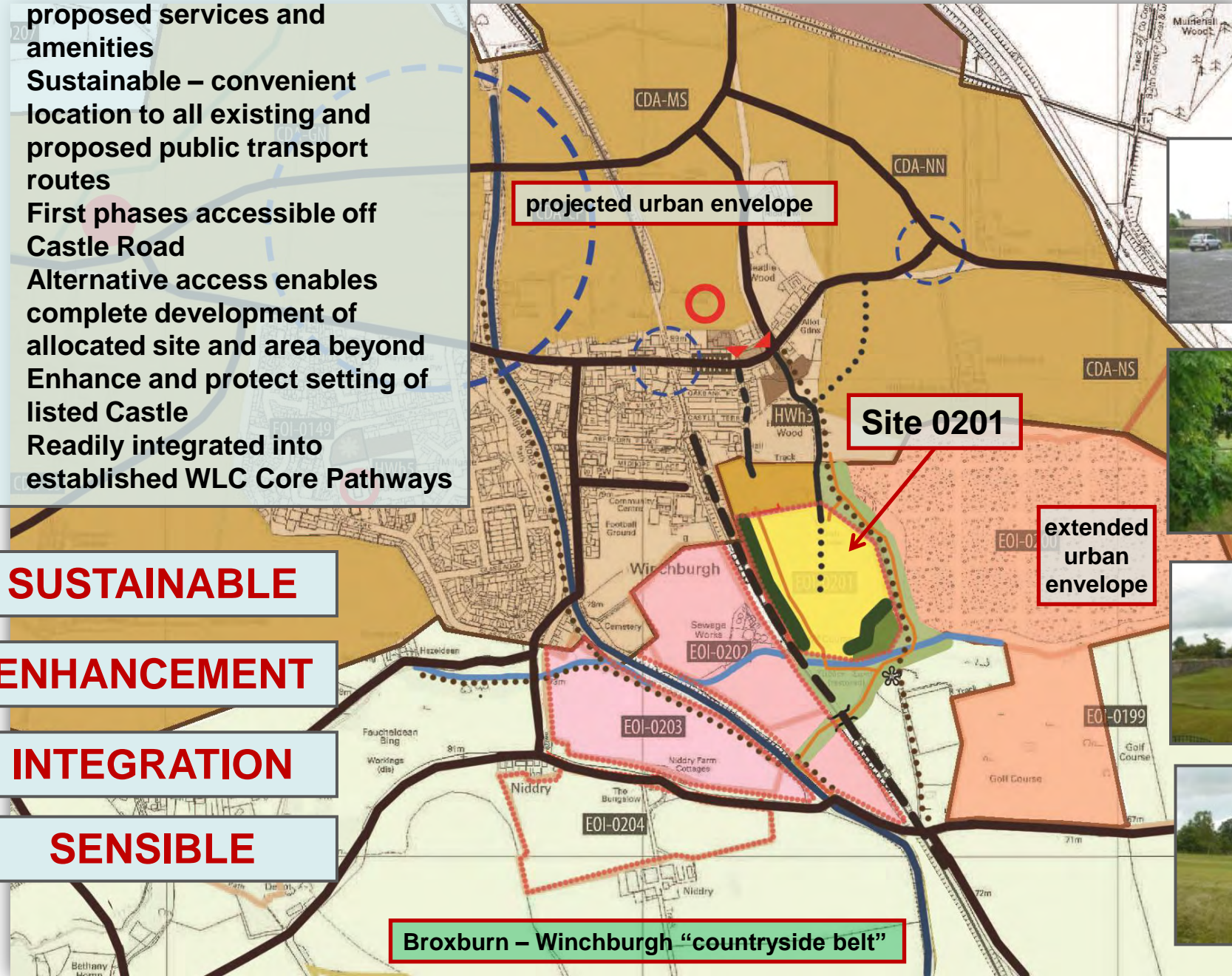
SUSTAINABLE

ENHANCEMENT

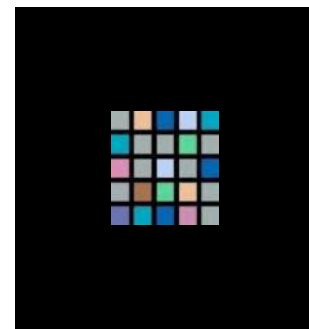
INTEGRATION

SENSIBLE

Broxburn – Winchburgh “countryside belt”



- projected urban envelope
- town centre
- road infrastructure
- railway
- canal
- burn
- neighbourhood centre
- WLC core paths
- secondary school
- primary school
- Grade A Listed Niddry Castle
- proposed access
- road network
- structure planting
- linear parkland
- pedestrian and cycle integration
- protective castle setting
- proposed new allocation
- existing allocation

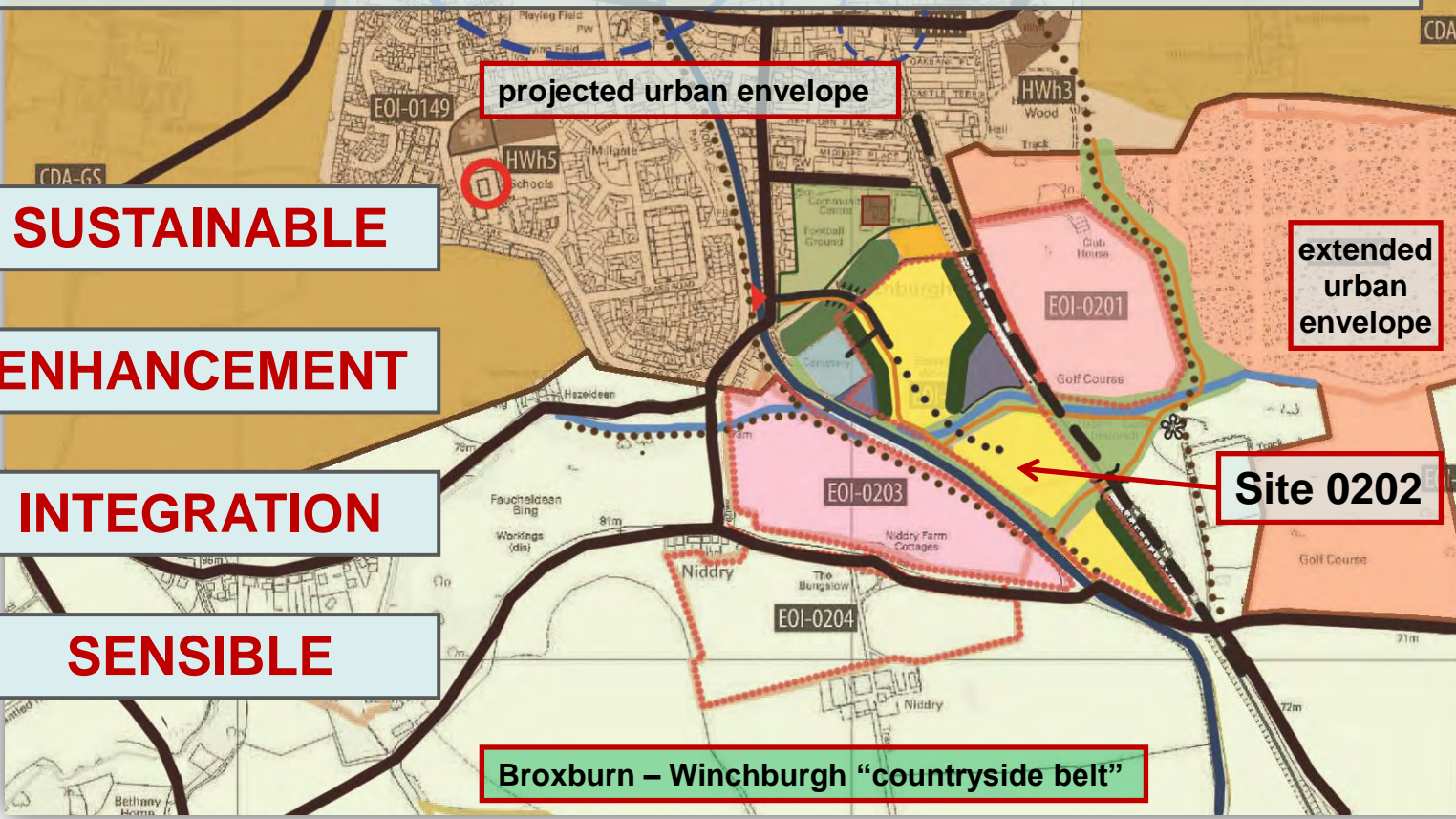


site 0202

7.2 hectares - Net Development Area of 5 hectares
Medium/Higher Densities – 190 homes

- Natural extension south and east of existing urban envelope
- Opportunity to integrate and concentrate higher density development closer to existing amenities.
- Sustainable - convenient location to all existing and proposed services and amenities
- Sustainable – convenient location to all existing and proposed public transport routes
- Potential enhancement of existing community facilities to compliment the long-term tenure of the adjacent park by West Lothian Council
- Potential extension to Cemetery and new safe access
- Potential improvement and relocation of allotments
- Opportunity to utilise existing canal and burn corridors for wider pedestrian and cycling integration to WLC Core Pathways
- Assisting recreational and heritage opportunities in the “countryside belt” between Broxburn and Winchburgh becoming reality

- projected urban envelope
- town centre
- road infrastructure
- railway
- canal
- burn
- neighbourhood centre
- WLC core paths
- secondary school
- primary school
- Grade A Listed Niddry Castle
- existing community facility
- existing cemetery and extension
- existing treatment works
- proposed access
- road network
- structure planting
- linear parkland
- pedestrian and cycle integration
- landscaped edge
- proposed new allocation
- possible allotment improvement/relocation

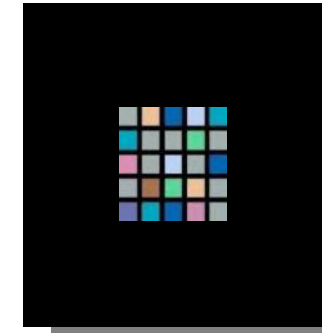


SUSTAINABLE

ENHANCEMENT

INTEGRATION

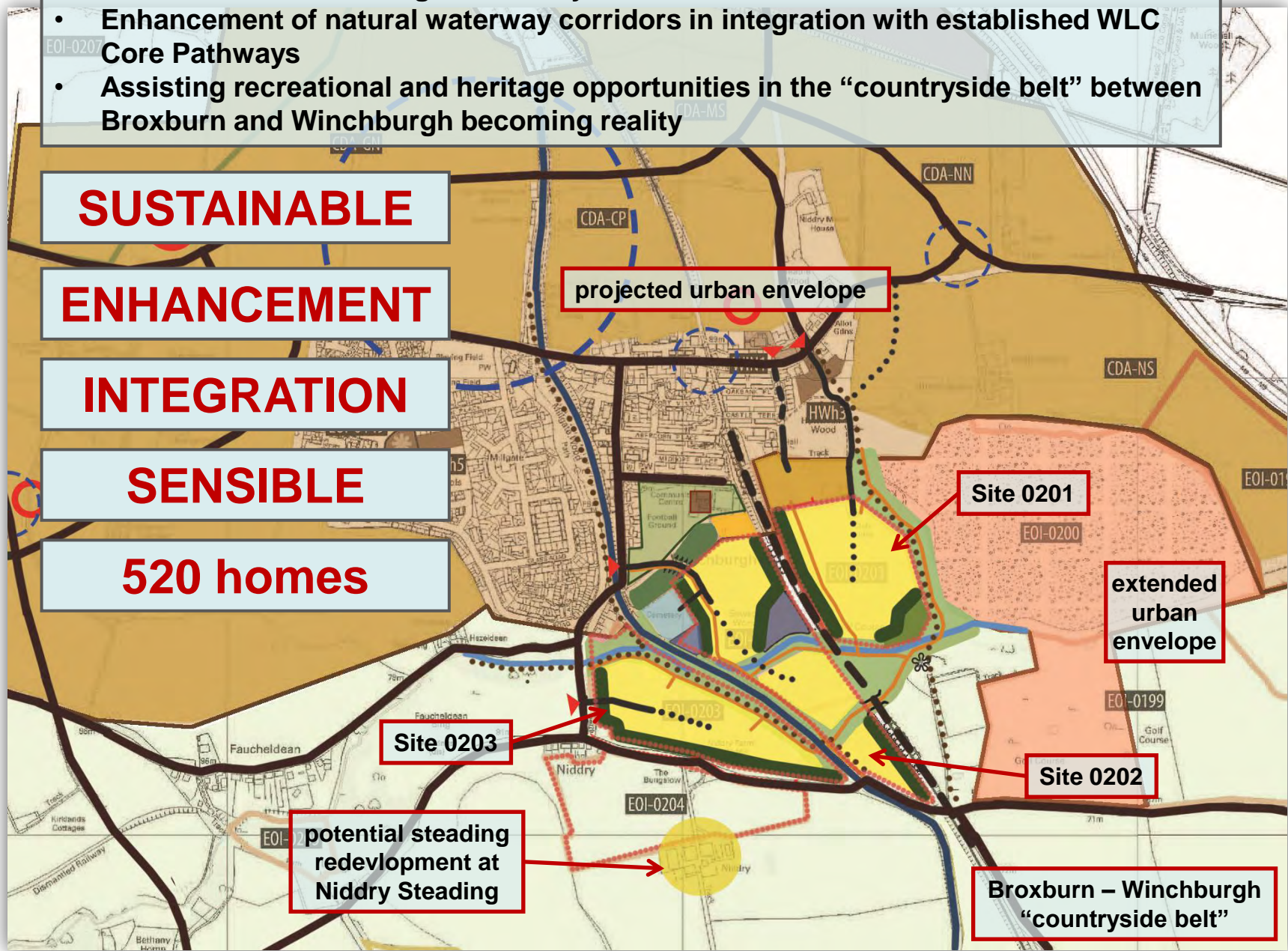
SENSIBLE



- Natural extension to existing urban envelope
- Sustainable - convenient location to all existing and proposed services and amenities
- Sustainable – convenient location to all existing and proposed public transport routes
- Enhancement of existing community facilities
- Enhancement of natural waterway corridors in integration with established WLC Core Pathways
- Assisting recreational and heritage opportunities in the “countryside belt” between Broxburn and Winchburgh becoming reality

Sites

0201/0202/0203 combined



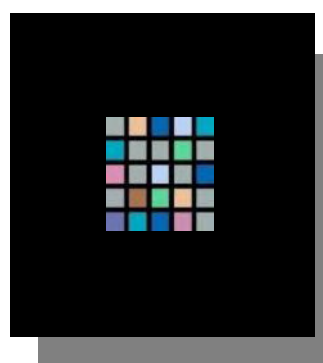
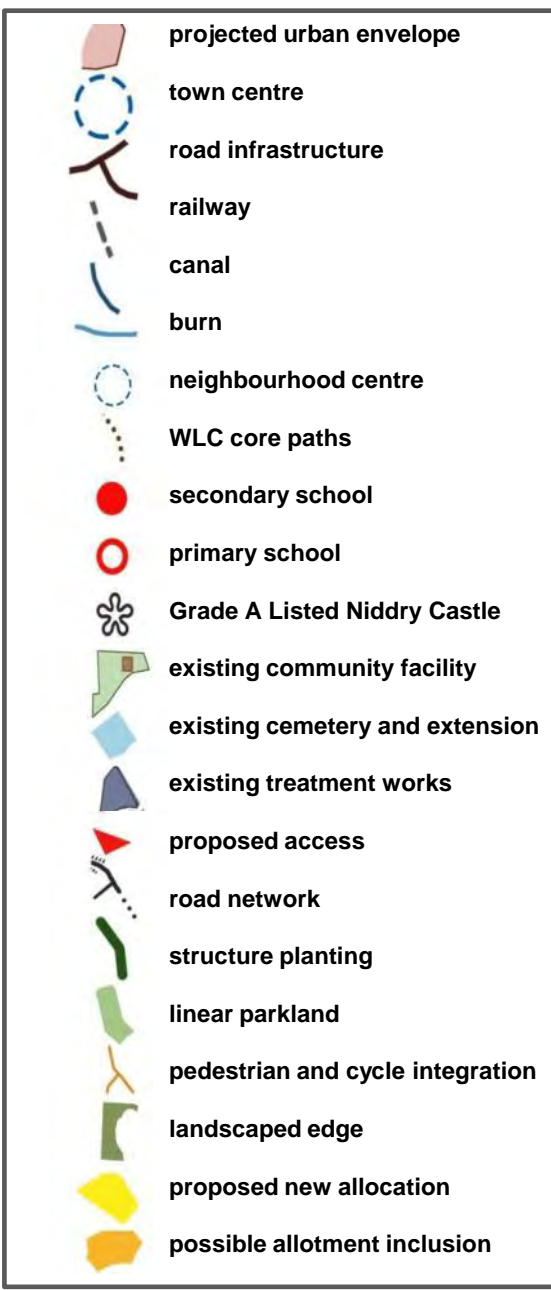
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ENHANCEMENT

INTEGRATION

SENSIBLE

520 homes



yeomanmcallister
architects interiors

combined situation

SUSTAINABLE

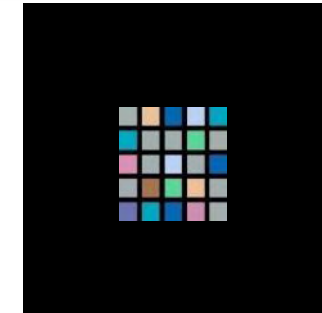
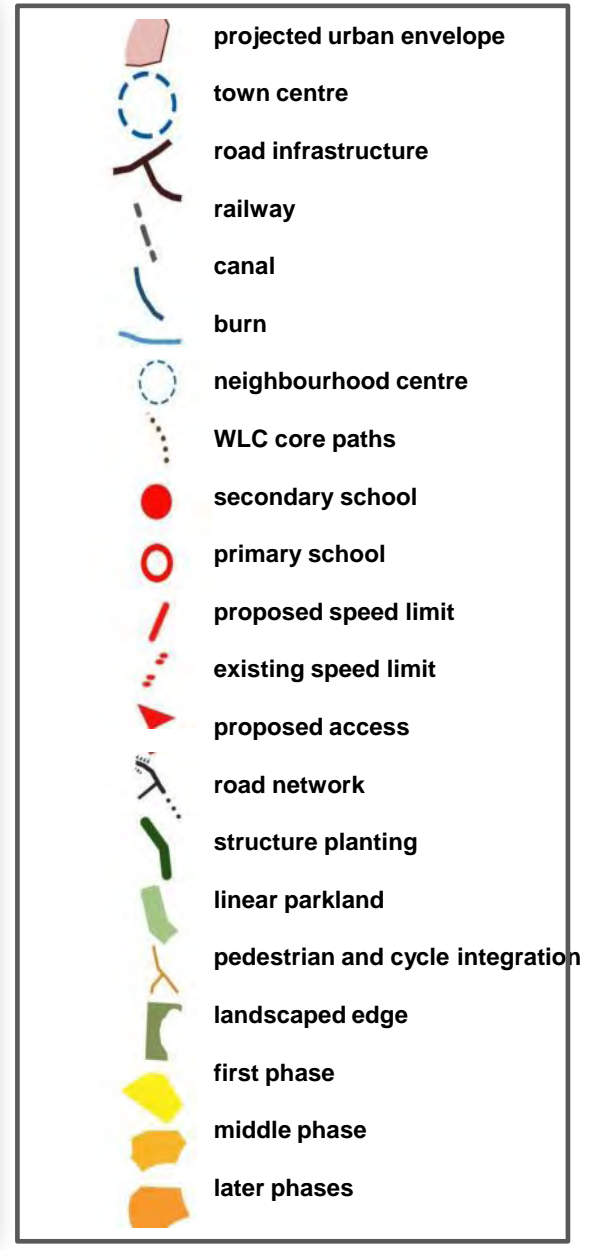
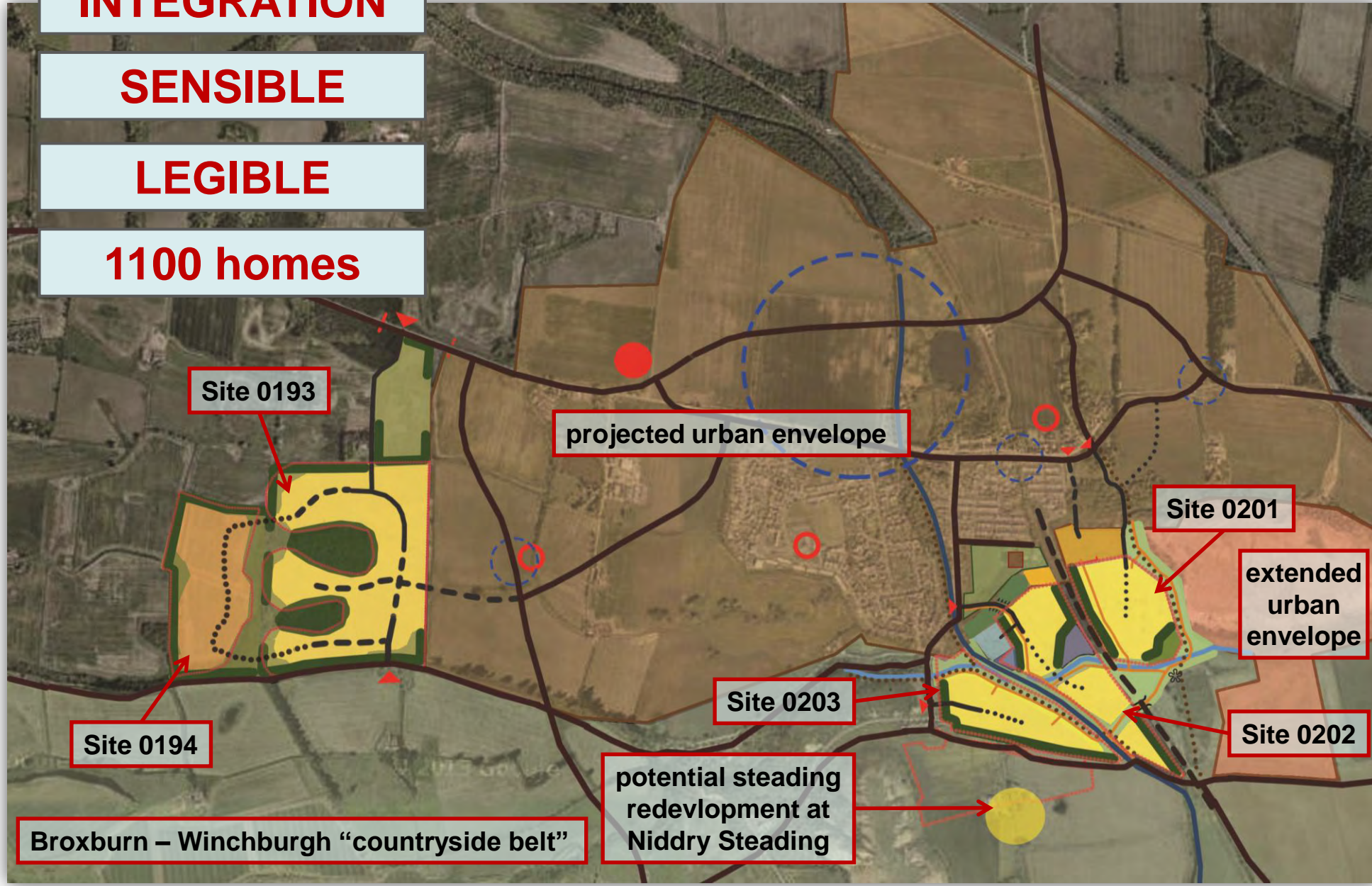
ORGANIC

INTEGRATION

SENSIBLE

LEGIBLE

1100 homes



team

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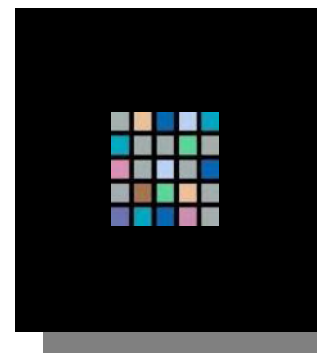


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Winchburgh, Southerly Expansion

Landscape And Visual Analysis

Project Number: 100094

Date: 10/10/2014



> Contents

Introduction	pg. 4
Scope of study	pg. 4
Landscape character and features	pg. 6
Countryside Belt	pg. 8
Visual receptors and views	pg. 8
Viewpoint 1: View east from Union Canal towpath	pg. 10
Viewpoint 2: View west from minor road to Kirkliston	pg. 12
Viewpoint 3: View west from Union Canal towpath	pg. 14
Proposed East Broxburn northerly expansion	pg. 16
Proposed Winchburgh Southerly Expansion and Mixed Use Allocation	pg. 16
Preliminary master planning of Winchburgh Southerly Expansion Area	pg. 18
Proposed changes to Countryside Belt boundary	pg. 18
Proposed future development area	pg. 18
Conclusion	pg. 18

Introduction

In August 2014 Optimised Environments Limited (OPEN) was commissioned by Regenco Trading Limited and Hopetoun Estate Trust to undertake a landscape and visual review of the land immediately to the south of Winchburgh and north of East Broxburn. The purpose of this is to inform the review being undertaken by PPCA Ltd in relation to future housing land supply and the current Local Plan Countryside Belt designation and will underpin representations being made to the West Lothian Council Local Development Plan Main Issues Report in relation to the non-allocation of land at South Winchburgh and the adjustment to East Broxburn portion of the Core Development Area boundary.

This study has been carried out by Chartered Landscape Architects through field and desk study.

Scope of study

The area of the study comprises the land to the east of Greendykes Bing and south of Niddry Castle Bing including land defined as both Countryside Belt and land allocated as Mixed Use in the West Lothian Local Plan (WLLP) 2009. The relevant extract of Map 2 of the WLLP is illustrated in Figure 1 of this study.

PPCA Ltd has, separately, set out the basis for the proposed redefinition of the Countryside Belt boundary and the justification of the need for further Mixed Use development land to be allocated in this area. It is the purpose of this study to identify where such an allocation can be accommodated with the least detriment to the aims of the Countryside Belt designation. It will identify the most suitable sites, in landscape and visual terms, with the ability to meet this need whilst also having a strong relationship with the expanded/existing settlement and the infrastructure needed for housing in a suitable location that promotes sustainable living.

The proposed southerly expansion of Winchburgh is consistent with the Winchburgh Future Urban Extension Master Plan 2009 and previous submissions to West Lothian Council.

Legend

-  Countryside Belt boundary
-  Right Of Way
-  Canal towpath
-  Countryside Belt
-  Newliston House Garden and designed landscape
-  Open space
-  Employment site
-  Scheduled Ancient Monument
-  Cemetery expansion
-  Tree preservation order
-  Mixed Use Area (CDAs)

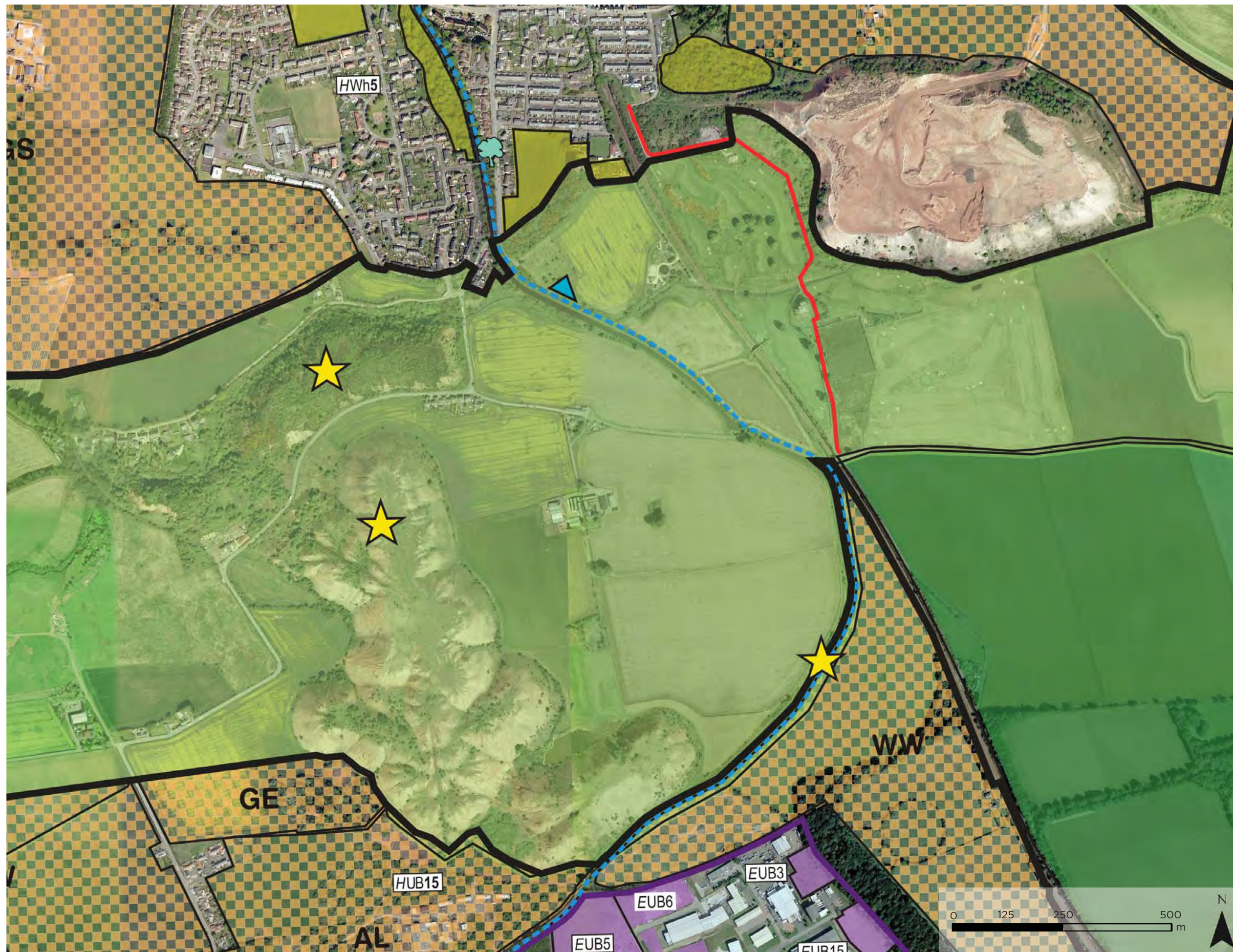


Figure 1: Extract from the West Lothian Local Plan (2009) with aerial photograph

Landscape character and features

In August 2014 West Lothian Council published the West Lothian - Landscape Character Classification (WL-LCC) which is a West Lothian Local Development Plan: background paper. It sets out to provide a 'revised base-line of landscape character units and important assessment information for a range of land use planning tasks including designation of local landscapes.' It provides an update to the outdated 1998 Lothians Landscape Character Assessment (LLCA) and has been informed by information gathered and refined as part of interim studies on wind energy capacity and the West Lothian Landscape Designation Review, 2013.

The land under consideration in this study was identified in the 1998 LLCA as part of the Lowland Plains Landscape Character Type (LCT) and specifically the Lower Almond Farmlands Landscape Character Area (LCA) of this type. The WL-LCC has divided this LCT/LCA into two separate LCTs - Lowland Plains and Lowland River Corridors. These areas have been further divided into geographically defined units of these types.

The area of interest in this study is defined as being within the Winchburgh/Niddry Plain Landscape Unit of the Lowland Plains Landscape Type as illustrated on Figure 2.

The Key Characteristics of the Lowland Plains LCT are set out in the WL-LCC as:

- 'Part of an extensive, smoothly rolling, lowland landscape of predominantly folded sedimentary rocks of Carboniferous age, holding significant oil shale measures to the north of the River Almond;
- Predominantly open, large scale, high quality arable farmland lying between Livingston and Edinburgh;
- The lowland plain averages around 100m AOD, rising gradually to the south to up to 240m AOD;
- Numerous burns are generally inconspicuous but minor valleys add complexity to the landform;
- The deeply incised and well wooded valley of the River Almond cuts through the area;
- Characteristic medium-large scale arable farmland becomes increasingly fragmented within the urban fringe to the east of Livingston and East Calder, and south of Broxburn, with a variety of land uses
- Shelter and local enclosure provided by woodland belts;
- Waste shale bings from oilworks punctuate the skyline and are a legacy of the industry north of the River Almond, as are neat rows of miners cottages (known as "the rows") in several villages;

- Localised humps, hollows and other subtle traces in the landscape such as disused mines and mineral railways;
- Generally long views across the open, large scale farmland; and
- Minor roads over the burns and Union Canal are often features of local interest in the landscape.'

The key characteristics of the Winchburgh/Niddry Plain unit of the Lowland Plains LCT are set out in the WL-LCC as:

- 'The gently undulating lowland plain is dominated by the artificial forms and striking orange / pink colours of the huge flat-topped Niddry and Faucheldean oil shale bings, Scheduled Monuments, to the east and south of Winchburgh;
- Winchburgh is a former mining town with rows of miners cottages and unsettled areas of poor land quality associated with past mining activity;
- Niddry Burn is the main watercourse but is inconspicuous;
- The Union Canal passes through the area and road overbridges are local features of interest in the landscape;
- Woodland is scarce and small in size, with some mixed plantation at Duntarvie Castle and sporadic coniferous plantation elsewhere, but not a landscape feature;
- Niddry golf course to the south-east of Winchburgh has a parkland appearance; and
- East of the area is more open and intensively farmed with good quality arable farmland more typical of the lowland plain further east beyond the district.'

There would appear to be an error in the description of the oil shale bings. Niddry Castle Bing, to the east of Winchburgh is not a Scheduled Ancient Monument and is currently being depleted through its use in construction projects. The bings to the south of Winchburgh are Faucheldean, which is a Wildlife Site and Greendykes. Both are Scheduled Ancient Monuments (SAM). Figure 3 illustrates the key landscape features and key views within the area along with the locations of the illustrated viewpoints.

The bings currently provide physical and visual containment of the area of this study. Their large bulk and form physically and visually divides this area from the land further to the west and north.

Niddry Castle is a Category A Listed Building in the form of a stone built, four storey keep that has been restored from its previously ruined form for use as a house. It is located to the south of Niddry Castle Bing and Niddry Castle Golf Course.

The Greendykes and Faucheldean bings as well as the Union Canal and the Niddry Farm enclosure SAMs, the Listed Building of Niddry Castle and the Garden and Designed Landscape (GDL) of Newliston House (located in the City of Edinburgh Council administrative area) have settings that are protected by planning policy.

Niddry farmstead lies on raised ground to the east Greendykes Bing. Other development also exists within this area along the minor road with a row of houses at Niddry and the Niddry Farm Cottage and other dwellings further to the east. These buildings are located at the start of the 30mph limit. The Winchburgh Cemetery and the Sewage Treatment Works as well as the housing described above give this area a sense of its edge of settlement characteristics. Winchburgh is largely set beyond screening landform and woodland, however, the existing village is visible on the skyline to the north in views from locations within the Winchburgh/Niddry Plain as shown on Viewpoint 1. East Broxburn lies to the south but is not visible due to screening woodland and landform.

The main Glasgow-Edinburgh rail line runs through this area in cut. Its route is marked by vegetation but is otherwise not evident except when in close proximity to it.

To the east and south of the area the woodland of the Garden and Designed Landscape of Newliston House which extends across the road to the edge of East Broxburn forms the edge of the open, agricultural plain.



Legend







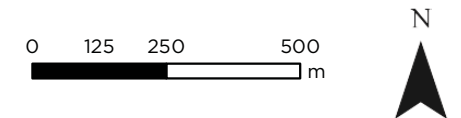
-  Local Authority Boundary
- West Lothian Landscape Character Type**
Source: West Lothian Landscape Character Classification (August 2014)
-  Coastal Margins
-  Lowland Hill Fringes
-  Lowland Plains
- Edinburgh Landscape Character Type**
Source: Edinburgh Landscape Character Assessment (January 2010)
-  Lowland Farmland
-  Policy Landscape

Figure 2: Landscape Character



Countryside Belt

West Lothian Council has designated part of the Niddry/Winchburgh Plain as Countryside Belt and set out the associated policies within the Local Plan. The following is an extract from the WLLP that provides more information on this.

‘3.66 - A Countryside Belt is designated between Winchburgh and Broxburn to prevent the coalescence of these settlements. The landscape integrity of the area and the provision of community woodlands and recreational access will be important management objectives linked to the setting and amenity value of Greendykes Bing. The potential for Heritage Park exists in this location.

Policy ENV 22

Countryside Belts are designated at Livingston, Bathgate/ Whitburn and Winchburgh/ Broxburn as shown on the proposals map.

Opportunities to protect and enhance the landscape of these Countryside Belts will be sought and encouraged as part of the Central Scotland Forest initiative through woodland planting and managed access.

Policy ENV 23

Within the Countryside Belts, development that will lead to coalescence between settlements and for which there is no specific locational need will be resisted. Proposals that would result in sporadic development, or the expansion of houses and for which there is no specific locational need, will be similarly resisted.’

Visual receptors and views

Within the study area the key visual receptors are the residents of a small number of properties, people using the minor roads, people using the Union Canal and the associated Public Right of Way and National Cycle Route along the towpath, Winchburgh Cemetery. Niddry Castle Golf Course users and users of other paths also gain views of this area. People may also be working in the area e.g. on farms and at the Sewage Treatment Works.

The road that provide the main opportunity for views within the area is the minor road that runs between Winchburgh and East Broxburn. To the north of the junction at Niddry this is the B8020 that connects Winchburgh and Broxburn. From the junction at Niddry a minor road runs east and then south, after crossing the Union Canal and rail line, linking in to the A89 to the east of the East Mains Industrial Estate. A further minor route joins this near to the rail bridge and provides a link to Kirkliston. From this route, when travelling west, open views are obtained across the Countryside Belt. Such views are illustrated by Viewpoint 2.

Views across the Countryside Corridor from the minor roads that link between Winchburgh and eastern Broxburn are restricted in places by woodland in the south and landform in the north. Narrow bridges across the rail and canal corridors form important features along the route.

The B8020 that links Winchburgh and Broxburn passes between the Greendykes and Faucheldean bings immediately to the west of Niddry. These features restrict visibility of the area being considered in this study from parts of the Countryside Belt that lie further to the east.

The Union Canal passes across the Countryside Belt generally at grade or on embankment. Open views of the Winchburgh/Niddry Plain are gained from much of the route between Greendykes Bing in the south to where it enters cutting to the north and passes through the village of Winchburgh. Viewpoints 1 and 3 illustrate views from the Union Canal towpath.

The residential properties are generally clustered within two areas at Niddry (and nearby cottages) and between Viewfield and Thistle Cottage in the south along the edge of Newliston. These have views across the northern and southern parts of the Countryside Belt respectively.

Other isolated residential properties are Niddry Castle, Niddry Farm and a large new property on the Kirkliston road.

Whilst the main Glasgow-Edinburgh rail line passes through the Countryside Corridor there is very little visibility of the wider landscape from the route which runs through a deep cutting at this point. It is possible to briefly glimpse Niddry Castle to the north of the line as one passes near to it at a point where the line passes through an area of less significant cutting.

Legend









-  Preferred alternative housing site in MIR
-  Newliston House Garden and designed landscape
-  Mixed Use Area (CDAs)
-  Woodland edge
-  Scheduled Ancient Monument (SAM)
-  Key views
-  Viewpoint
-  Niddry Castle



Figure 3: Landscape Features

Viewpoint 1: View east from Union Canal towpath

Union Canal towpath

Winchburgh

Sewage treatment works

Northern area of
Niddry Castle
Golf Course

Niddry Castle Bing





Low point

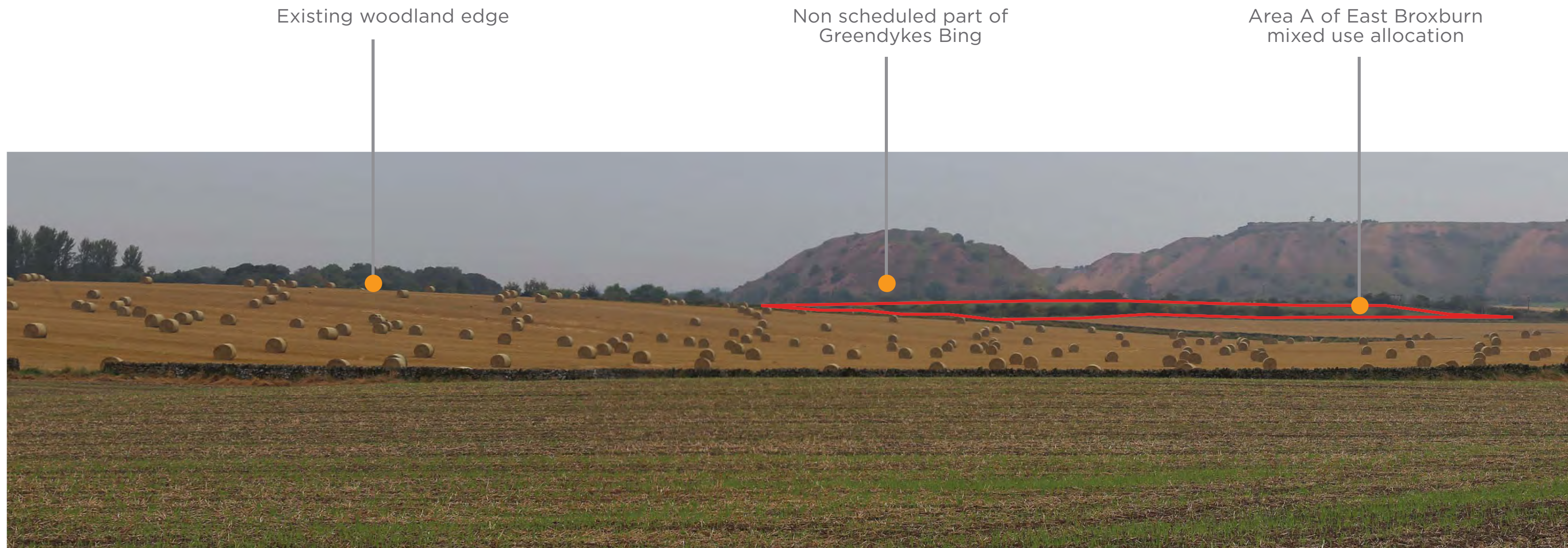
Niddry Castle

Footbridge over rail line

Rising area

Union Canal towpath

Viewpoint 2: View west from minor road to Kirkliston



Greendykes
Bing

Niddry Farm

Rail bridge

Niddry
housing

Faucheldean
Bing

Minor road East
to Kirkliston



Viewpoint 3: View west from Union Canal towpath



Niddry Farm

Greendykes Bing

Niddry Farm
cottages

Faucheldean Bing



Proposed East Broxburn northerly expansion

As part of the Winchburgh-East Broxburn CDA land to the north of East Broxburn was allocated as mixed use development with associated allocation of housing numbers. This is shown as area WW on the Figure 1 extracted from the WLLP.

In undertaking this study on behalf of Regenco Trading Limited and Hopetoun Estate Trust OPEN has considered the landscape and visual implications of the northerly expansion of eastern Broxburn. If the area shown on Figure 3 as Area A were to be developed as mixed use development in accordance with the proposed master plan for the area it would create a substantial physical and visual incursion across the Countryside Belt.

Currently the settlement of East Broxburn is not apparent in views until one reaches near to the edge of the industrial area when travelling along the Union Canal or towpath. Viewpoint 1 illustrates the prominence of Area A in views across the open Countryside Belt towards the Greendykes Bing SAM from the minor road to the east. Area A sits on higher ground than other parts of the mixed use allocation and would be seen extending across the middle ground within this view.

It is suggested that in accordance with the provision for the redrawing of the Countryside Belt and CDA boundaries as explained in PPCA Ltd's report this allocation should be drawn back to the defensible boundary to the south of the treed field edge. Development of the northerly edge of East Broxburn would then be contained by landform and woodland and have a limited effect on the character of the Countryside Corridor or Niddry/Winchburgh Plain. This redefined boundary is shown on Figure 4.

Proposed Winchburgh Southerly Expansion and Mixed Use Allocation

The land to the south of Winchburgh has been considered in terms of its capacity to accommodate mixed use development whilst still allowing the aims of the Countryside Belt to be met.

Viewpoint 1 illustrates that the land to the east of Greendykes Bing and south of the minor road offers a wide expanse of open countryside that provides a visual and physical separation of the two settlements which is enhanced by the removal of Area A from the East Broxburn northerly expansion. This is apparent from the minor roads and the Union Canal and towpath as one passes through the area.

Also of note in Viewpoint 1 is the fact that the areas to the north of the road and west of the rail line are not visible from this part of the Countryside Belt due to the landform. Whilst their development as Mixed Use areas would result in a change in character of part of the Winchburgh/ Niddry landscape unit this would have a relatively localised effect on the edge of the existing countryside and would not impinge on the setting of Greendykes Bing SAM or the most open, undeveloped parts of the Countryside Belt to its east. There would be some impingement on the setting of Niddry Castle, however substantial parts of its outlook would remain open.

The minor road that runs from Niddry eastwards provides a defensible boundary to the redefined Mixed Use development area. From the Union Canal and towpath the bridge that carries the minor road across it (as seen in Viewpoint 3) illustrates the strong transitional feature that this creates between the proposed southerly extents of Winchburgh and the countryside beyond.

Legend













-  Countryside Belt boundary
-  Right Of Way
-  Canal towpath
-  Countryside Belt
-  Newliston House Garden and designed landscape
-  Open space
-  Employment site
-  Scheduled Ancient Monument
-  Cemetery expansion
-  Tree preservation order
-  Mixed Use Area (CDAs)
-  Future Mixed Use Area



Figure 4: Proposed alteration of Local Plan boundaries

Future master planning of Winchburgh Southerly Expansion Area

The proposed southerly expansion areas offer an opportunity to create further housing areas that are relatively close to the existing and proposed facilities and infrastructure of Winchburgh.

Whilst the proposed boundary of the mixed use area is shown to extend right to the bridge and minor road, in line with other allocations it is not proposed that the full area would become built development. The most southerly areas would remain undeveloped except as part of the landscape framework.

The purpose of these areas will be to:

- Maintain existing landscape patterns of vegetation along stream corridors;
- Provide a set back to the edge of built development from sensitive locations such as Niddry Castle whilst also avoiding the higher parts of the proposed allocations that lie close to the retained Countryside Belt as seen in Viewpoints 1 and 3;
- Retain open views from and to some of the key features of the landscape such as Niddry Castle, Greendykes Bing and the canal bridges (Viewpoint 1 and 3 illustrate some of the areas that would form part of the landscape framework); and
- Accommodate woodland and open space for use by the communities and forming a constituent part of a Heritage Park that is accessible from the Union Canal and the integrated path network of Winchburgh and its planned expansion.

A foot/cycle bridge adjacent to the canal bridge could provide a safer crossing between the areas to the west and east of the Union Canal and provide access to the towpath and proposed Heritage Park on the east side. An existing widening of the canal on the Winchburgh side of the canal bridge could provide opportunities for canal boats to stop at this location (Viewpoint 3).

This area is set at the heart of the historic elements that characterise this part of the landscape. There is ready access from the canal and the integrated path network of Winchburgh with the towpath providing a link to Broxburn. It also allows views of the Greendykes Bing and Niddry Castle that can be the focus of interpretative material.

Proposed changes to Countryside Belt boundary

It is proposed that the boundary of the Countryside Belt should be redefined as shown on Figure 4. This will allow the allocation of Mixed Use development within areas to the south of Winchburgh that can be accommodated on the edge of the countryside area that has some existing 'edge of urban' characteristics, has a defensible boundary in the form of the minor road and has a degree of separation from the wider expanse of the Countryside Belt through landform and features such as the bridges and roads. This could be done without compromising the character and aims of the Countryside Belt to the degree that the northern extension of East Broxburn undoubtedly would through its substantial physical and visual incursion into the open countryside area of the Niddry/ Winchburgh Plain character unit.

Proposed future development area

During the 'life' of the development plan under consideration it is envisaged that the Niddry Castle bing will be depleted to such an extent that it presents a suitable location for further housing on brownfield land in close proximity to the services and infrastructure provided by Winchburgh.

In tandem with this area coming forward for development it is proposed that an area to the south and east of this (currently part of Niddry Golf Course and the bing respectively) should also be removed from the Countryside Corridor to provide additional areas for mixed use development at this stage. It is envisaged that built development components of the mixed use allocation within this area would be set back from the minor road and Niddry Castle by some distance in order to maintain a suitable separation and to maintain the sense of the open landscape of the Countryside Belt in this area. A suitable set back and landscape mitigation along the western, eastern and southern boundaries would be agreed in detail at a later stage along with plans for the integrated development of this area with the former Niddry Castle Bing site.

Conclusion

PPCA Ltd has highlighted the need to increase the housing land supply in this area as part of wider representations to the West Lothian Council Local Development Plan Main Issues Report. The land to the south of Winchburgh is able to accommodate further Mixed Use development that is well connected with the facilities and infrastructure of Winchburgh in the short, medium and longer term.

The Development Plan allows for the de-allocation of land that has not been shown to be progressing towards development and there is also a provision for the redrawing of the Countryside Belt if necessary.

It is suggested that the northern boundary of the East Broxburn Mixed Use allocation (WW in the WLLP) should be redrawn to more defensible boundaries. This will avoid the substantial incursion into the most open part of the Countryside Belt in the Winchburgh /Niddry Character Unit that this would otherwise create.

The boundaries of the Countryside Belt should be redrawn to address these changes in the Mixed Use allocations to the north and south.

The resultant width of the Countryside Belt and the sense of separation between the communities of East Broxburn and Winchburgh will be increased as a result of this alteration and the sensitive master planning of the allocated areas.

The land at Winchburgh can provide deliverable and well integrated housing as well as a landscape framework that can be of benefit to the local communities, protect areas of sensitivity and include provision for the Heritage Park that is easily accessible via the canal and towpath.

In the longer term Niddry Castle Bing will have been diminished and will come forward as a potential housing area on brownfield land. In tandem with this it is proposed that the southerly part of the current Niddry Castle Golf Course land is developed as Mixed Use with suitable set-backs from the road and Niddry Castle as well as landscape mitigation to be agreed nearer the time. The Countryside Belt would be redrawn accordingly to accommodate this.

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**Representation to West Lothian Council Local Development Plan
Main Issues Report**

Housing Land and other matters

**Joint submission on behalf of Regenco Trading Limited
& Hopetoun Estate Trust / Aithrie Estates**



October 2014

Contents

- 1. Introduction**
- 2. National Planning Framework 3**
- 3. Scottish Planning Policy**
- 4. Strategic Development Plan**
- 5. Local Development Plan Main Issues Report**
- 6. Local Development Plan Main Issues Report Settlement Statements**
- 7. Housing: Local Development Plan background paper**
- 8. Housing Land Position Statement (in the context of the Housing Land Audit 2013)**
- 9. Five year housing land supply and phasing**
- 10. Proposed solution**
- 11. West Lothian place-based Green Networks: Local Development Plan: background paper**
- 12. West Lothian Landscape Character Classification: Local Development Plan: background paper**
- 13. Conclusion**

1 Introduction

1. PPCA Ltd and Peter PC Allan Ltd have been jointly instructed by Regenco Trading Ltd and Hopetoun Estate Trust / Aithrie Estates (RTL / HET) to make representations to the West Lothian Council Local Development Plan Main Issues Report that has been published for consultation purposes. The following Report sets out in detail the representations lodged in relation to housing land matters as set out in the Main Issues Report and relevant Background Papers.
2. This is supplemented by separate, but linked, representations made to site-specific issues such as land at South Winchburgh and should be read in conjunction with these representations.
3. The representations below have been generally ordered sequentially and relate to paragraph numbers and questions posed in the Main Issues Report document.

2 National Planning Framework 3 (NPF3)

4. The third National Planning Framework (NPF3) provides the statutory framework for Scotland's long-term spatial development. It sets out the Scottish Government's spatial development priorities for the next 20 years. Planning authorities are required to take the Framework into account when preparing Development Plans and it is a material consideration in the determination of planning applications.
5. NPF3 notes, at paragraph 2.5, that the Scottish Government wants to see a significant increase in house building in coming years to ensure housing requirements are met across the country. It notes the need for flexibility in housing delivery and that the planning system should focus its efforts particularly on areas where the greatest levels of change are expected and where there is pressure for development. West Lothian Council is one such area.
6. NPF3 notes that throughout Scotland, there will be a need to ensure a generous supply of housing land in sustainable places where people want to live, providing enough homes and supporting economic growth. Winchburgh is such a location as demonstrated by detailed assessment set out below.
7. It notes that housing requirements will continue to be at their most acute around Edinburgh, Perth and Aberdeen, requiring targeted action to better match demand for land with

infrastructure capacity. RTL is working collaboratively with West Lothian Council and other third parties to ensure that delivery of housing and associated uses at Winchburgh is not held up by infrastructure requirements.

8. NPF3 notes that more ambitious and imaginative planning will be needed to meet requirements for a generous and effective supply of land for housing in a sustainable way. The Scottish Government specifically wishes to see a greater and more concerted effort to deliver a generous supply of housing land in the SESplan Strategic Development Plan area. A Key Action for NPF3 is to support housing development and the Scottish Government will work with housing providers and the development sector to achieve this. That approach is endorsed and promoted through this representation.
9. NPF3 confirms the Scottish Government's central purpose to create a more successful country, with opportunities for all to flourish, through increasing sustainable economic growth. To achieve this, the Government Economic Strategy aims to share the benefits of growth by encouraging economic activity and investment across all of Scotland's communities, whilst protecting natural and cultural assets.
10. In terms of the vision for Scotland, NPF3 confirms that this includes a vision where Scotland is a successful, sustainable place with a growing economy which provides opportunities that are more fairly distributed between, and within, all communities. The objective is to provide high quality, vibrant and sustainable places with enough good quality homes. This is endorsed and promoted as part of the ongoing strategic expansion of Winchburgh.
11. NPF3 explains that Scotland's seven city regions will continue to be a focus for investment, and the spatial strategy provides a growth and development agenda for each of the city regions.

3 Scottish Planning Policy

12. Scottish Planning Policy, published in 2014, set out national planning policies which reflect Scottish Ministers' priorities for operation of the planning system and for the development and use of land in Scotland. In line with NPF3 it promotes sustainable economic growth and a presumption in favour of development that contributes to sustainable development.

13. It notes that –

“By locating the right development in the right place, planning can provide opportunities for people to make sustainable choices and improve their quality of life. Well-planned places promote well-being, a sense of identity and pride, and greater opportunities for social interaction. Planning therefore has an important role in promoting strong, resilient and inclusive communities. Delivering high-quality buildings, infrastructure and spaces in the right locations helps provide choice over where to live and style of home, choice as to how to access amenities and services and choice to live more active, engaged, independent and healthy lifestyles.”

14. The strategic expansion of Winchburgh, the successful delivery of the first phases of development there and the ongoing interest and demand for more land from the development industry clearly demonstrate that this is the right type of development in the right location.

15. Scottish Planning Policy paragraph 28 states that the planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term. Development Plan policy should give due weight to net economic benefit, support good design and make efficient use of land, buildings and infrastructure. It should also support regeneration, the delivery of accessible housing, business, retailing and leisure development and infrastructure e.g. education and transport. It should improve health and well-being by offering opportunities for social interaction and physical activity and protect, enhance and promote the natural and built environment.

16. The principle of additional development land at Winchburgh complies with the above requirements in full.

17. Scottish Planning Policy paragraph 30 states that Development Plans should positively seek opportunities to meet the development needs of the plan area in a way which is flexible enough to adapt to changing circumstances over time and set out a spatial strategy which is both sustainable and deliverable, providing confidence to stakeholders that the outcomes can be achieved.
18. Allocation of additional land at Winchburgh will achieve the flexibility desired by Scottish Planning Policy and is wholly deliverable.
19. Both the NPF3 and Scottish Planning Policy endorse the need for planning to take every opportunity to create high quality places by taking a design-led approach. This is supported by RTL and put into practice at Winchburgh. Development at Winchburgh has, and would, take a holistic approach that responds to place whilst balancing cost and benefit of development over time.
20. RTL / HET endorse the Scottish Planning Policy requirement that planning should direct development to the right place. Development at Winchburgh both uses existing resources and creates new ones with the capacity to expand. It will co-ordinate housing with other forms of development, open space and infrastructure. It will use land adjacent to the existing settlement to tie that development in to the settlement itself. Additional land for development at Winchburgh will have significant and ongoing benefit for the amenity of local people and the vitality of the local economy. As an example, it will help deliver new schools, a town centre and rail station for the settlement. Feedback from existing businesses shows that the additional population growth seen from only the first phase of completed and occupied development has benefitted their individual business interests.
21. In relation to new housing development, Scottish Planning Policy notes that NPF3 aims to facilitate new housing development. House building makes an important contribution to the economy and planning can help to address the challenges facing the housing sector by providing a positive and flexible approach to development. In particular, provision for new homes should be made in areas where economic investment is planned.
22. Scottish Planning Policy paragraph 110 notes that the planning system should identify a generous supply of land for each housing market area within the plan area to support the achievement of the housing land requirement across all tenures, maintaining at least a 5-year supply of effective housing land at all times. It should enable provision of a range of attractive, well-designed, energy efficient, good quality housing, contributing to the creation

of successful and sustainable places, and have a sharp focus on the delivery of allocated sites embedded in action programmes, informed by strong engagement with stakeholders.

23. The Scottish Planning Policy makes an important distinction here between the identification of a generous (+10-20%) supply of land for development and the need to maintain at least a 5 year housing land supply at all times. Scottish Planning Policy allows for West Lothian Council to over allocate land for development. As noted below, this will be necessary, subject to certain caveats, to address the current significant failure in housing land supply.
24. Paragraph 119 notes that Local Development Plans in City Regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. In allocating sites, planning authorities should be confident that land can be brought forward for development within the plan period and that the range of sites allocated will enable the housing supply target to be met. Paragraph 122 notes that Local Development Plans should allocate appropriate sites to support the creation of sustainable mixed communities and successful places and help to ensure the continued delivery of new housing.
25. The Strategic Development Plan period runs from 2009 to 2024 and then on to 2032. As such, we are significantly through the first ten year period of that Plan. If, as anticipated the West Lothian Council Local Development Plan is adopted in 2016 that leaves only three years of the first ten year period remaining thus reinforcing the need to front load and over allocate land to ensure delivery of housing in the short term to meet Strategic Development Plan requirements.
26. Within this submission, and in line with Scottish Planning Policy above, priority is given to the identification of land capable of delivering housing product within ten years of Local Development Plan adoption. Given that the Local Development Plan will not be formally adopted until 2016, short term housing delivery would take place in the first five year period of that Plan i.e. 2016-2021. Medium term delivery will take place in the second five year period of the Plan (2021-2026) and longer term delivery will take place post 2026 beyond which the Local Development Plan requires to give an indication of future growth.
27. Winchburgh is one such location where additional land can be brought forward in the short, medium and long term to deliver housing completions that will meet requirements and address, in part, the housing land supply shortfall. The expanded Winchburgh will be a wholly sustainable settlement offering a full range and choice of facilities and community

uses. The issue of land supply and 5 year requirements is dealt with in detail by this submission below.

4 Strategic Development Plan

28. The SESplan Strategic Development Plan was approved with modifications by the Scottish Government in June 2013. Supplementary Guidance on Housing Land was approved with modifications by the Scottish Government in June 2014. Together, this sets the strategic framework for land use planning in the period to 2032.
29. The foreword of the Plan states that it sets out a spatial strategy which recognises existing development commitments and promotes a sustainable pattern of growth. The strategy is supported by a framework for delivery which will promote and secure economic growth and the delivery of housing in the most sustainable locations; and promote the development of strategic transport and infrastructure networks to support that growth and to meet the needs of communities.
30. This is supplemented by the Plan Vision which states that, by 2032, the Edinburgh City Region will be a healthier, more prosperous and sustainable place which continues to be internationally recognised as an outstanding area in which to live, work and do business and a Spatial Strategy that seeks to build on existing committed development, focusing further development along preferred corridors optimising connectivity and access to services and jobs. West Lothian Council is both a Sub-Regional Area and one of thirteen Strategic Development Areas acting as the primary locations for growth and investment and focus for further development. The Plan notes that new development proposals will complement and not undermine the delivery of existing committed development. The Plan Spatial Strategy aims to encourage key development sectors and promote a sustainable growth pattern.
31. The Plan notes that the Scottish Government has set out that its central purpose is to increase sustainable economic growth, with the Strategic Development Plan taking a more pro-active role. It notes that while the recent economic downturn has affected delivery of and demand for housing, it is particularly important in supporting economic growth and recovery to ensure that sufficient land is allocated and available for housing development in the period up to 2024.
32. It notes that there is a significant amount of land currently allocated or with planning permission across the SESplan area. The extent to which those sites remain capable of delivering house completions by 2024 will be re-assessed in LDPs. Where necessary,

alternative sites will be allocated, and a five year effective housing land supply will be maintained at all times to ensure that delivery is not unnecessarily constrained. Allocating sufficient land and maintaining a five years' effective housing land supply at all times will assist in increasing the delivery of new housing as soon as restrictions ease. In terms of infrastructure, Local Development Plans should make provision for the priority strategic interventions and identify additional local projects that will be necessary to facilitate the Strategic Development Plan. Investment in existing and new infrastructure at the right time and in the right locations is a vital component of delivering sustainable economic growth.

33. This approach is wholly supported by RTL / HET and considered necessary in light of maintenance of a five year housing land supply as set out below. Allocation of sufficient land to maintain at least a five year supply at all times is a Scottish Government requirement as noted above.

34. The Plan notes infrastructure issues associated with new development in West Lothian including transport and education. RTL is working with the Council to deliver a new rail station at Winchburgh as well as nursery, primary and secondary education to accommodate growth. It notes that new housing allocations could be directed towards existing committed developments if it can be demonstrated that they can contribute towards the housing requirement within the specified time periods. Winchburgh can accommodate and deliver short, medium and long term growth over and above that committed development that is the subject of planning permission using the model detailed below.

35. The Plan sets overall housing land requirements and, through Policy 5, uses Supplementary Guidance to establish the spatial split of that between the six constituent planning authorities. In the period to 2019, West Lothian Council is expected to identify land capable of delivering 11,420 dwellings. Policy 5 notes that Local Development Plans will allocate sufficient land which is capable of becoming effective and delivering the scale of the housing requirements for each period, which will be confirmed in the Supplementary Guidance.

36. Strategic Development Plan paragraph 115 states that –

“Scottish Planning Policy confirms that allocating a generous supply of land for housing in the Development Plan will give the flexibility necessary for the continued delivery of new housing, even if unpredictable changes to the effective land supply occur during the life of the plan. Maintaining a supply of effective land for at least 5 years at all times should ensure that there is a continuing generous

supply of land for house building. In this context, it would not be appropriate, in the absence of any other constraints, to prevent the earlier development of any sites which are allocated for construction to start after 2019. Doing that could result in the unnecessary release of less suitable sites instead.”

37. This is confirmed by Strategic Development Plan Policy 6. In that context, and based on the details set out below, it is wholly acceptable for West Lothian Council to concentrate the allocation of additional land at Winchburgh for the short, medium and long term delivery of housing completions that would assist in the maintenance of a five year housing land supply as required by Scottish Planning Policy and the Strategic Development Plan.

38. In relation to the maintenance of a five year housing land supply, Strategic Development Plan Policy 7 goes on to state that –

Sites for greenfield housing development proposals either within or outwith the identified Strategic Development Areas may be allocated in Local Development Plans or granted planning permission to maintain a five years’ effective housing land supply, subject to satisfying each of the following criteria:

a. The development will be in keeping with the character of the settlement and local area;

b. The development will not undermine green belt objectives; and

c. Any additional infrastructure required as a result of the development is either committed or to be funded by the developer

39. Land identified at Winchburgh would be Development Plan led, of a scale necessary to enable short, medium and long term delivery of housing completions and in keeping with the character of the settlement. There is no Green Belt in West Lothian. Any additional infrastructure required as a result of the development would be committed or funded by the developer. This strategy, therefore, complies with Strategic Development Plan requirements set out above.

40. The Supplementary Guidance to the Strategic Development Plan on Housing Land provides further details in relation to Plan Policy 5 – Housing Land in relation to the distribution of housing land requirements by Local Authority within the Plan area.

41. It confirms that the total housing requirement 2009-2024 is 107,545 units with 74,835 units required to 2019 and that, to 2019, the West Lothian Council requirement is 11,420 units.
42. It states that most of the new housing requirement is expected to come forward on land already allocated for that purpose or with planning permission. The Plan also indicates that the new allocations required for the area could be directed towards existing committed developments if it can be demonstrated that they can contribute towards the housing requirement within the specified time periods. Winchburgh, as a committed development within a Core Development Area can deliver additional housing completions in the short – medium term over and above current delivery projections as outlined below.
43. At a 2012 base, it is expected that Local Development Plans will have to identify land to accommodate at least an additional 24,338 units. Table 3.2 of the Guidance notes that, for West Lothian as a whole, this translates into a requirement for additional land to accommodate, as a minimum, 2,130 units.
44. The Guidance refers to delivery and the need to maintain a five year housing land supply at all times. As a point of clarification, and in line with Scottish Planning Policy, this is a minimum requirement. The Council is within its rights to over allocate land that is deliverable to meet more than five years requirements. The issue of five year land supply is dealt with in detail below.

5 Local Development Plan Main Issues Report

Main Issues Report Introduction

45. RTL / HET support the need to direct development to the right locations as set out in the Main Issues Report Introduction. Winchburgh, as a strategic growth area that is demonstrably delivering housing and other community and infrastructure development, is one such location where the Council must take the opportunity to build on this success.
46. Representation is lodged to paragraph 1.28 of the Main Issues Report in relation to supporting documentation. The Proposed Plan must be updated to take account of National Planning Framework 3 and Scottish Planning Policy (published in 2014) and, particularly the need to promote sustainable economic growth and a presumption in favour of development that contributes to sustainable development.

47. RTL / HET generally support the Main Issues identified in Figure 4 and the Council Priorities set out in Figure 5 of the Main Issues Report subject to the identification of land to meet development requirements in full. There are no significant environmental or other external land use planning factors that would prevent West Lothian Council from meeting in full or exceeding its development requirements within the Local Authority area.

Main Issues Report Vision, Aims and Spatial Strategy for West Lothian

48. In response to Main Issues Report Questions 1 and 2 on the Vision for West Lothian, the following change is proposed – replace the second and third sentences with –

“It will be better connected by road and public transport and will have a full range and choice of housing, education, community, health, retail, recreation and leisure facilities and a network of green spaces to meet the needs of its growing population. Development requirements will be met in full and 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.”

49. RTL / HET support the reference to the need for a generous supply of housing land to be identified in the Council area in paragraph 2 of the Main Issues Report. The Council must meet its housing need in full, addressing both unmet backlog and future requirements. This will require the identification of land over and above that shown as “preferred” in the Main Issues Report.

50. With regards to paragraphs 2.4-2.7 on page 12 of the Main Issues Report, to meet development requirements in full will require commitment to the delivery of new infrastructure in phase with development as is the case with the expanding Winchburgh settlement. A joined up approach involving developers, landowners, the Council and other third parties starting now will enable the delivery of land in a more efficient and timeous manner. Early, focussed engagement is essential if the Council is to meet development requirements in full.

51. RTL / HET support the need to deliver housing in sustainable locations. The ongoing strategic expansion of Winchburgh fully complies with this and will deliver strategic transport

improvements to road and rail. It is logical that Winchburgh continues to be a focus for strategic sustainable development.

52. In response to Questions 3 and 4 of the Main Issues Report in relation to the Council Main Issues, it is considered that a more proactive and positive stance should be adopted by West Lothian Council. As such the following changes are proposed –

- Main Issue 1 – replace the word “adequate” with “full”.
- Main Issue 3 – replace the first Aim with “Provide a generous supply of housing land to meet development requirements in full and provide for a minimum effective five year housing land supply at all times”
- Main Issue 4 – replace Aim with “Ensure that infrastructure and facilities are provided in phase with development to support population and economic growth and where appropriate, secure contributions from developers, landowners and other third parties, including the Council where appropriate, towards such provision”.

53. In terms of the Local Development Plan Main Issues Report Spatial Strategy, RTL / HET fully supports the Council ongoing priority to directing development towards existing Core Development Areas. Winchburgh, as one such area, has the capacity to accommodate additional growth in the short, medium and long term as set out below and should be highlighted as such. The further sustainable expansion of Winchburgh will reduce the need to travel, prioritises sustainable transport modes and will make a significant contribution to meeting Council affordable housing requirements.

54. In response to Main Issues Report Question 5, RTL / HET fully supports the flexible approach to acceptable uses on employment land and as set out in Main Issues Report paragraph 3.22. Uses listed within that paragraph that are outwith Use Classes 4, 5 and 6 are still major employment generators and should be positively encouraged to locate within the West Lothian Council area, especially within areas that have good communication and transportation links e.g. at motorway junctions.

Main Issue 3 – Housing Growth, Delivery & Sustainable Housing Locations

55. In terms of housing growth, delivery and location, the Local Development Plan must meet its housing land requirement in full, both in terms of backlog need and Strategic Development Plan additional land requirements. Support is given to the continuing prioritisation of Core Development Areas within the Main Issues Report and Winchburgh, as one such area, is

clearly delivering upon its housing and wider strategic development requirements. Additional development allocations at Winchburgh are fully compliant with housing requirements set out in National Planning Framework 3, Scottish Planning Policy and the Strategic Development Plan.

56. Additional infrastructure directly associated with such development on land in the control of RTL would, in line with national policy and the Strategic Development Plan be provided in phase with such development.

57. With respect to Main Issues Report paragraph 3.43 the market demand for housing at Winchburgh, demonstrated both in the rate of development that has occurred since circa October 2012 and the interest in the acquisition of additional land by house builders shows that there is capacity within the construction industry to deliver over and above existing allocations in the settlement.

58. RTL is progressing discussions with the Council on strategic infrastructure delivery necessary for the wider settlement at this time. This includes the delivery of education facilities referred to in Main Issues Report paragraph 3.44. RTL / HET support in full the need to accelerate development delivery in Core Development Areas. The identification of appropriate further land at Winchburgh for residential development delivery in the short term, a set out below, will encourage and, in part fund, the early delivery of such infrastructure.

59. To clarify the position in paragraph 3.46, the new Housing Need & Demand Analysis under preparation will inform SESplan 2 as the replacement for the current Strategic Development Plan. This emerging Local Development Plan must be consistent with current Strategic Development Plan housing land requirements.

60. With regard to paragraphs 3.52 – 3.54, the Local Development Plan must maintain a minimum five year housing land supply at all times. From the details below, West Lothian Council is failing to do so at this time. The only viable solution, as set out below, is for the Council to significantly over allocate land capable of delivering housing development within the short term to remedy its housing land supply failure. Only by introducing this level of generosity in the supply will the land supply failure be resolved.

61. In response to Main Issues Report Question 15, RTL / HET proposes that the Council adopts Scenario 3 to meet its housing land requirements plus additional deliverable development sites that will meet a significant proportion of the 4,371 housing land supply shortfall detailed below. This proactive approach will demonstrate a commitment from the

Council to deal with its significant five year housing land supply problem in the short-medium term and would deliver Scottish Planning Policy and Development Plan compliant sites to meet housing requirements for a range and choice of housing types and tenures. The significant benefits to the Council in this approach would be the delivery of housing to meet requirements, additional contributions to infrastructure requirements and additional affordable housing delivered.

62. In response to Questions 20 and 22, a proactive approach must be taken to the prospect of delivery from existing housing allocations set out in the adopted Local Plan. This will, and should, result in housing site deletion and reprogramming. However, as set out below, this requires to go further than proposed in the Main Issues Report preferred approach to take a realistic approach to the prospect of delivery of housing development from larger sites such as Westfield and East Broxburn. Only this approach will allow sites that can deliver in the short – medium term, thereby addressing the housing land supply failure, to come forward.
63. Representation is raised to paragraph 3.74 of the Main Issues Report. RTL is working with the Council and other third parties to ensure the delivery of infrastructure necessary to enable the long term strategic expansion of Winchburgh. RTL is fully committed to this process but is also well aware that the final solution will require commitment from all parties involved including the Council.
64. Representation is raised to paragraph 3.75 of the Main Issues Report. In order to maintain a five year land supply, provide additional upfront funding for infrastructure such as schools and deliver affordable housing land release cannot be restricted to post 2024. Additional land release over and above the 400 units and preferred site identified in the Main Issues Report must take place at Winchburgh in the short and medium terms. Representation to the non-allocation of land at Winchburgh to this effect is made separately. The land in question is wholly deliverable in the short-medium term. Demand for additional land at Winchburgh from the house building industry is high and the Council stance on throttling land release there as set out in this paragraph of the Main Issues Report is frustrating delivery.
65. It is important to clarify that any additional land would be brought forward in parallel with the delivery of the strategic expansion of Winchburgh that has planning permission and not in place of it. The demand for residential development land at Winchburgh is such that there is no question over deliverability of land to the south of the settlement in conjunction with development elsewhere.

66. As such, in response to Questions 23 – 25 of the Main Issues Report, RTL / HET supports an alternative approach to development delivery at Winchburgh to that proposed that requires short term delivery of housing completions on land over and above that identified in the Main Issues Report for reasons of housing land supply and infrastructure delivery.
67. With respect to paragraph 3.88 of the Main Issues Report, the issue of spare capacity at Linlithgow Academy requires to be fully resolved to ensure that housing delivery is not unnecessarily constrained. This matter has been the subject of detailed deliberation in recent planning appeals to the Scottish Government for residential development in the Linlithgow area and beyond. It is imperative that the Council, as Education Authority, is clear on available schools capacity across the entire Local Authority area now.
68. In response to Question 29 of the Main Issues Report, RTL / HET has no objection to the principle of development at Linlithgow but this must be managed in the context of committed development at Winchburgh, the phasing and delivery of secondary school education at Winchburgh and the environmental capacity of Linlithgow to accommodate further growth.
69. In response to Question 35, RTL / HET supports a revision to the Council affordable housing policy to bring it up to date with revised Scottish Planning Policy on the subject. The delivery of affordable housing can take a variety of forms but affordable housing is, often, one of a number of considerations in site delivery. A flexible approach must be adopted to allow delivery of the 25% requirement whilst, at the same time, maintaining development viability.

Main Issue 4 – Infrastructure Requirements and Delivery

70. RTL / HET recognise the importance of infrastructure delivery in phase with development. RTL / HET support the commitment in paragraph 3.110 of the Main Issues Report to the need for joint working between the private and public sector to deliver infrastructure requirements. This is working in practice in the delivery of the Winchburgh strategic expansion. All parties must continue to explore all available funding mechanisms for infrastructure such as schools and roads to ensure the efficient delivery of housing. This must include involvement of third parties such as the Scottish Government and opportunities provided by wider European funding initiatives. RTL / HET generally support the Council preferred approach to delivery in this context in answer to Main Issues Report Questions 38 – 41.
71. RTL / HET supports the Council stance as set out in paragraph 3.135 of the Main Issues Report in relation to the preference to locate new development in close proximity to existing or proposed public transport facilities e.g. a new Winchburgh rail station. RTL / HET also

support the Council priority given to measures that help to increase transport efficiency and reduce dependency on the private car. Only where necessary should local roads capacity be expanded. RTL / HET support the priority given to directing development to areas well served or capable of being served by public transport (paragraph 3.143). RTL / HET fully support the Council ongoing commitment to the delivery of a new rail station at Winchburgh.

72. In this context, Winchburgh is on existing strategic bus routes and will, through its strategic expansion, deliver a new rail station and park and choose facilities. As such, Winchburgh should be prioritised for additional housing and other development through the emerging Local Development Plan in the short – medium term.

73. In response to Question 42, RTL / HET supports the Council preferred approach to promoting access to / within West Lothian. In response to Question 43, RTL / HET fully supports the provision of a new rail station at Winchburgh.

74. In response to Question 45 of the Main Issues Report in relation to town centres and retailing, RTL / HET fully support the Council commitment to facilitate a new town centre at Winchburgh. This, in time, should be granted town centre status through future Local Development Plans.

75. In response to Questions 48 – 53, RTL / HET wishes to make representation to the current Countryside Belt designated between Winchburgh and East Broxburn. Winchburgh has potential to expand to the south of the village without adversely affecting the landscape setting of the settlement or, following a necessary review of the East Broxburn portion of the wider Core Development Area allocations as set out in a separate Report, resulting in any form of coalescence with East Broxburn. Representation is lodged to the boundaries of the Countryside Belt between Winchburgh and East Broxburn as shown in the Main Issues Report Winchburgh map and the non allocation of land for mixed use development to the south of the village to that effect. The details of this are set out in a separate representation Report. The two settlements would remain discrete and separated by a wider Countryside Belt area as a result of the changes proposed by this representation.

76. With regard to Main Issues Report Questions 80 – 82 and paragraph 3.212, representation is lodged to the assertion made in the Main Issues Report that no further land be brought forward for development adjacent to the Union Canal between Winchburgh and East Broxburn. As noted above, and in separate representation, there is capacity for Winchburgh to expand to the south to accommodate mixed use development in the vicinity of the rail line and Canal with no significant net detrimental effect on setting of the Canal, rail line or

settlement. The Canal already has an urban / rural edge to it as it passes through Winchburgh and, will have even more so if East Broxburn Core Development Area proposals come forward. Representation is lodged to the non-allocation of this land for mixed use development capable of delivering housing completions and other uses in the short – medium term.

77. In relation to the Main Issues Report Section on emerging Supplementary Guidance, RTL / HET supports the production of Supplementary Guidance in relation to the new non-denominational secondary school required at Winchburgh.

6 Local Development Plan Main Issues Report Settlement Statements

78. Representation is lodged to the scale and programming indicated in the Local Development Plan Main Issues Report (both text and maps) of the East Broxburn portion of the wider Core Development Area. The boundary should be adjusted as per the separate representation lodged in the subject, housing numbers adjusted downwards, as indicated in the latest masterplan submitted on behalf of the landowners and housing completion rates reprogrammed to reflect issues associated with delivery of the land in question. There is little prospect of East Broxburn delivering strategic scale housing completion rates before 2021 (see later). This delivery failure pre 2021 should be redirected to Winchburgh and land allocated that is capable of short term housing completions as part of wider mixed use development.

79. Representation is lodged to the continued identification of land at Westfield for 550 residential units. There is little prospect of residential development coming forward at Westfield. There has been no development interest expressed in the site and there are significant pre-development commencement works required and outstanding as set out in planning conditions. As currently committed development this site is restricting access to Linlithgow Academy for sites such as that at Winchburgh by reserving capacity that will not be taken up in the short-medium term. This site should be fundamentally reprogrammed to only come forward post 2021 and the balance of housing development in that period transferred to Winchburgh.

80. The issue above is simply one of timing and the need to redistribute housing land to areas where short – medium term completions are deliverable in line with Scottish Planning Policy. RTL / HET recognises the strategic relationship between Winchburgh and East Broxburn and the role that the expansion of East Broxburn will play in wider regeneration initiatives e.g. the former Candleworks site in the settlement. However, delivery of housing product

here will not take place for a number of years thus creating a gap in housing supply and the funding of wider infrastructure. The reprogramming of housing completions and redistribution of short term housing to Winchburgh will address these issues whilst maintaining the strategic expansion opportunity for East Broxburn established through the last Structure Plan and adopted Local Plan and carried forward in the Strategic Development Plan and emerging Local Development Plan.

7 Housing: Local Development Plan: background paper

81. Representation is lodged to the Background Paper as currently written as it refers to the requirements of National Planning Framework 2 and Scottish Planning Policy of 2010. This must be updated to reflect NPF3 referred to above and Scottish Planning Policy of June 2014. It is noted that this may require significant rewriting of the Paper given the directions included in the updated Scottish Government documentation including the presumption in favour of sustainable development and the fact that these latest documents take account of letters written by the former Chief Planner referred to in the Background Paper.
82. In that context, representation is lodged to paragraph 2.15 of the Background Paper that refers to the Chief Planner letter of March 2011 and the “current economic climate”. This is not a consideration in the need to maintain a minimum five year land supply at all times or provide a generous housing land supply through the Development Plan process set out in Scottish Planning Policy of 2014. All references to this should be removed from both this Paper (e.g. paragraphs 2.26, 2.32 and 2.65) and the Local Development Plan itself. The figures shown for site programming should also be unaffected by economic climate whilst, at the same time, be realistic. West Lothian Council must take a positive stance on meeting development requirements in full for the Local Development Plan period under consideration and particularly at Winchburgh which has an established track record of delivery.
83. Representation is lodged to the fact that the Background Paper would appear to make no reference to the Council affordable housing building programme agreed in 2014 that will deliver affordable housing on Council sites over the next two years.
84. Representation is lodged to paragraph 2.61 of the Background Paper in relation to comments on delivery from Core Development Areas. There have been over 100 unit completions and almost 70 occupations from only two house builders at the Winchburgh strategic expansion area alone since October 2012 i.e. in less than two years. This is nearly twice that originally expected through the Housing Land Audit process. There are four house builders on site now and that will increase to six within the next six months with demand for additional land parcels ongoing.

85. It is understood that land at Armadale was the single most successful site in the UK for a period of time for one of the national house builders on site there.
86. For the Background Paper to state that “the contributions made by the Core Development Areas thus far, has been insignificant” is, therefore, simply wrong.
87. Winchburgh, as a standalone settlement undergoing strategic expansion, can be considered to have its own geographically identifiable “housing market areas”. Land is being developed to the west of the settlement, within its central core area and to the north at this time. Each area is operating independently of others in terms of marketing and housing delivery and without conflict. The same argument can be advanced for the creation of a South Winchburgh Housing Market Area, thus overcoming any concerns arising over deliverability of land to the south of the settlement. This would, as with the above, operate independently of the other Housing Market Areas whilst, at the same time, contributing to the overall strategic growth of the settlement.
88. The Housing Land Audit base for the Background Paper also requires to be update to the latest agreed Housing Land Audit (2013) and, where possible 2014, especially in relation to housing completions which should have been quantified at 1st April 2014 survey date. Representation is lodged to paragraph 4.29 of the Background Paper where it is stated that “for the five year period from 2012 to 2017, the total number of houses forecast to be built in West Lothian was 3,418 (or an average of 684 houses per annum). This figure represents the level of output that the house building industry agreed was realistic from the existing established supply”. For the sake of clarity the Audit process is an assessment of known sites and likely supply. This does not mean that there is not capacity for additional land to come forward in the short term (outwith the Housing Land Audit process) to deliver completions to address the five year housing land supply shortfall detailed below.
89. Representation is lodged to the Background Paper where it refers to an “effective post 5 year housing land supply”. The effective housing land supply is defined in Scottish Planning Policy as “The part of the established housing land supply which is free or expected to be free of development constraints in the period under consideration and will therefore be available for the construction of housing”. It is important not to confuse the effective five year housing land supply and requirement from the wider established housing land supply. In five year housing land requirement terms, the effective supply is not the 14,281 units referred to in Background Paper paragraph 4.31.

90. Representation is lodged to Figure 16 as it refers to the former Structure Plan. This is out of date and has been superseded by the SESplan Strategic Development Plan. References to the former Structure Plan housing land requirement are irrelevant. An appropriate methodology for the calculation of the five year housing land requirement using the SESplan Strategic Development Plan (base date 2009) that has been agreed through the Scottish Government planning appeal process is set out below.
91. It is essential that the Background Paper is clear on the role of windfall and urban capacity sites in the housing land supply. Such sites can only be included in forward programming for Audit purposes once planning permission has been issued for such development.
92. RTL / HET supports the statement in the Background Paper in paragraph 4.66 that a new rail station at Winchburgh could assist in the delivery of more sustainable travel patterns in West Lothian. On that basis, additional short, medium and long term housing allocations should be made, over and above that proposed in the Local Development Plan Main Issues Report in the settlement. In that context, RTL supports the comments made in discussions between the Council and Homes for Scotland that there is a market along the M9 Corridor in settlements including Linlithgow, Livingston and Winchburgh.
93. The most up to date five year housing land supply situation is set out below.

8 Housing Land Position Statement (in the context of HLA 2013)

94. The Local Development Plan Housing background paper makes reference on page 31 to a Housing Land Supply Position Statement and states that this provides an update of land supply figures with reference to the HLA 2013.
95. Representation is lodged by RTL / HET to the contents of this Statement in relation to the most up to date housing land position in the West Lothian Council area.
96. The Statement is dated February 2014 and, therefore, pre-dates and takes no account of the approved Scottish Government Supplementary Guidance on Housing Land that accompanies the SESplan Strategic Development Plan or the content of the Ministerial Approval letter of June 2014. It takes no account of the requirements set out in Scottish Planning Policy or National Planning Framework 3 of June 2014 as detailed above.
97. Representation is lodged to the opening paragraph of the Introduction of the Statement which states that that planning authorities maintain a five year effective supply of housing land at all times. Scottish Planning Policy of June 2014 requires that at least a five year

housing land supply be maintained at all times (paragraph 123). This allows the Council to over-allocate land for residential development purposes through the Local Development Plan process.

98. The scale of the housing land requirement for the West Lothian Council area has now been set out in the Strategic Development Plan Supplementary Guidance of June 2014. The Local Development Plan Main Issues Report was published for consultation in August 2014. The Statement is out of date and must be comprehensively updated as a result.
99. The Statement confirms the annual completions achieved and detailed through the Housing Land Audit process. Representation is lodged to paragraph 2 of page 3 of the Statement where it states that the incorporation of sites to meet the requirements of the Supplementary Guidance will significantly increase programmed completion figures.
100. This statement is false as the sites allocated through the emerging Local Development Plan will not be confirmed until Local Development Plan adoption with lead in times anticipated beyond that before housing completions occur.
101. Certain existing strategic housing sites, subject of separate representation, that the Local Development Plan expects to deliver housing output in the short to medium term, either have no planning permission at this time or are non-effective. The Council cannot rely on additions to such sites e.g. East Broxburn to deliver housing product in the short to medium term.
102. Lastly, in relation to this point, housing programming is dynamic with new sites coming forward replacing sites that are completed over time. For any significant increase in housing completions to occur, the Council must over-allocate land to meet requirements.
103. Representation is lodged to the text below Table 2 of the Statement. It must be made clear that the effective five year housing land supply for Housing Land Audit purposes is 3,635 units. There is no prospect of delivering 14,470 units in the same period. The issues of the differences between land supply and the Audit process, the need to maintain a minimum five year housing land supply at all times and phasing are set out in detail below.
104. Representation is lodged to the reference to the Seafield Road planning appeal as this has, again, been overtaken by subsequent appeal decisions and is, in any case, not necessarily representative of the housing land position in the West Lothian Council area at October 2014.

9 **Five year housing land supply and phasing**

105. The identification of land capable of accommodating development is one part of the delivery of land for housing in the West Lothian Council area and is dealt with through the Development Plan process. The need to maintain a minimum five year housing land supply at all times is another. Paragraph 123 of Scottish Planning Policy (June 2014) states –

“Planning authorities should actively manage the housing land supply. They should work with housing and infrastructure providers to prepare an annual housing land audit as a tool to critically review and monitor the availability of effective housing land, the progress of sites through the planning process, and housing completions, to ensure a generous supply of land for house building is maintained and there is always enough effective land for at least five years. A site is only considered effective where it can be demonstrated that within five years it will be free of constraints and can be developed for housing.”

106. This allows West Lothian Council, as planning authority, to actively address the issue of sites that have no prospect of bringing forward housing development through the Local Development Plan review process through adjustment to allocations and / or reprogramming of completions. This allows for allocations with no prospect of delivery to be deleted.

107. Strategic Development Plan Policy 6 requires that –

“Each planning authority in the SESplan area shall maintain a five years’ effective housing land supply at all times. The scale of this supply shall derive from the housing requirements for each Local Development Plan area identified through the supplementary guidance provided for by Policy 5. For this purpose planning authorities may grant planning permission for the earlier development of sites which are allocated or phased for a later period in the Local Development Plan.”

108. The Scottish Government approval of the Strategic Development Plan Supplementary Guidance on Housing Land in June 2014 included a modification to remove the second sentence of paragraph 3.13 of that document. This, in effect, requires the Strategic Development Plan to maintain a five year housing land supply at all times in line with

Scottish Planning Policy above and, from that, the need for Local Development Plans to identify sufficient land, both in numerical and phasing terms, to meet requirements.

109. West Lothian Council is failing to comply with Scottish Planning Policy and the Strategic Development Plan at this time in relation to the maintenance of a five year housing land supply. The five year housing land supply requirement in the Council area has failed since circa 2009. This is demonstrated below for the period 2009 (the start of the Strategic Development Plan period) to 2013. This methodology has been agreed through the Scottish Government planning appeal process.

Strategic Development Plan requirement

SESPlan housing land requirement 2009-19	11,420 units
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(source: SESPlan Strategic Development Plan Supplementary Guidance 2014)

Calculating the effective housing land supply

Housing completions 2009-13	1,825
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Audit 5 year effective supply 2013-18	3,625
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Audit effective supply 2013-19	4,336
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<u>Council total supply 2009-19</u>	6,161
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(source: Housing Land Audit 2013)

Housing land requirement	11,420
---------------------------------	--------

minus

Housing completions to date	1,825
------------------------------------	-------

equals

Remaining requirement 2013-19	9,595
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divide by

Remaining Plan period (6 years)	1,599
--	-------

multiplied by

Five year effective supply requirement	7,996
---	-------

less

Five year forward programming	3,625
--------------------------------------	-------

equals

Shortfall in five year supply (2013-18)	4,371 units
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Percentage shortfall 2013-18	55%
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110. There is an ongoing failure to maintain a five year housing land supply in the West Lothian Council area. The failure to maintain a five year land supply will continue and get worse according to the projected housing completion rates set out in the latest agreed Housing Land Audit and the annual housing completion figure of only 615 units from draft Housing Land Audit 2014 for the year 2013-14.
111. This is due, in part, to the fact that there are certain large scale housing allocations identified by the current Local Plan that have not delivered housing product and, for various reasons such as marketability and land ownership are unlikely to do so in the period 2009-21. RTL / HET fully endorses the concern raised in paragraph 3.60 of the Local Development Plan that allocating additional land in itself will not guarantee additional housing delivery. Additional land that has a definite prospect of delivery in the short and medium term must be identified to meet the ongoing and worsening five year housing land supply problem. Land at Winchburgh meets this requirement.
112. There is no means of artificially accelerating housing land completions from committed sites in the West Lothian Council area at this time. The scale of the problem is so bad that even development “hotspots” such as Winchburgh cannot, alone, make up the shortfall.
113. It is neither possible nor appropriate to argue that emerging housing land supply through the preferred sites identified in the Main Issues Report will simply make up this shortfall as many such allocations are of a scale that require significant lead in, infrastructure dependent and / or time restricted. They are also too few in number. It is not likely that such sites will deliver housing completions until years 4 or 5 of the latest agreed Housing Land Audit at the time of consideration. Even should an additional 200 units be completed in that Audit year these would only replace completions that have occurred in earlier years on sites no longer in the Audit process. Housing land supply is a dynamic process that requires constant supply. There needs to be a short term over allocation of land to address immediate supply problems and further land for the subsequent five years.
114. Specifically in the context of draft Housing Land Audit 2014, representation is lodged to any inference that any part of the Winchburgh planning permission in principle area is constrained by marketability issues.
115. The only means of addressing this concern is a combined approach of reprogramming existing site delivery and identification of short term deliverable land that will produce housing completions within five years. Site reprogramming will also address the issue of education infrastructure capacity especially at Linlithgow Academy. This will free up capacity

that is reserved for housing sites with little or no prospect of coming forward in the short term but, due to new build schools infrastructure, can be accommodated in the longer term when, realistically, housing completions could be expected to start on such sites. This capacity can then be properly directed to accommodate short –medium term ongoing development and new short – medium term proposed development.

Westfield

116. There is little prospect of residential development coming forward at Westfield. This is an allocated site with full planning permission for 550 units, expiring in 2015, but noted as constrained in the West Lothian Council Housing Land Audit 2013 for marketing reasons. There has been no development interest expressed in the site and there are significant pre-development commencement works required and outstanding as set out in planning conditions. As currently committed development this site is restricting access to Linlithgow Academy for sites such as that at Winchburgh by reserving capacity that will not be taken up in the short-medium term. This site should be fundamentally reprogrammed to only come forward post 2021 and the balance of housing development transferred to Winchburgh.

East Broxburn

117. The East Broxburn portion of the wider Core Development Area, as identified by the previous Structure Plan, is the only strategic development location in West Lothian where there has been no planning permission issued or development commenced. East Broxburn has been in the public domain since 2001 when the last Structure Plan was first published for consultation. It was confirmed as an allocation on adoption by the Council of its current Local Plan in 2009 but was included in earlier draft versions of the Plan dating back to before 2004. There is little prospect of planning permission here in the short term and, from that, no prospect of residential development in the medium or, possibly long term. The East Broxburn allocation suffers from major environmental issues and requires significant infrastructure investment to allow development to come forward.

118. This point is reinforced by the Broxburn Community Council response, dated 1st July 2014, to the recent masterplan revision put forward for the allocated site at East Broxburn that actively reduces the expected housing output from the site. This letter raises serious and fundamental concerns over contamination and undermining in the vicinity of the proposed primary school, noise and ecological concerns, transport and infrastructure relating to the East Broxburn allocation. This supports the concerns raised previously by RTL / HET over the fundamental deliverability of this site at all.

119. Representation has been lodged, separately, to both the current boundary of the East Broxburn allocation and also the proposal to bring forward additional land here for development purposes when there is no prospect of development within the existing allocation and an overall reduction in housing numbers through the latest iteration of the masterplan produced for the site in early 2014.
120. The benefits of development in the East Broxburn portion of the wider Code Development Area to the wider area are recognised in terms of housing delivery, regeneration and community growth. However, it is considered essential that the Council fundamentally re-examines the delivery strategy and programming for East Broxburn in terms of infrastructure requirements and scale as part of this Local Development Plan process to avoid the continued identification of land for development that only makes up housing numbers and prevents housing delivery elsewhere.
121. A reprogrammed East Broxburn would have no net detriment for education provision either in that settlement or in Winchburgh. The only education contributions required by Winchburgh from East Broxburn relate to denominational secondary school requirements.
122. The short term loss of units at East Broxburn would be made up by an allocation at south Winchburgh. There would therefore be no loss of roof tax contribution to the new school and such contribution would be made sooner. Importantly, this would not increase housing numbers in a wider context but, instead, prevent a numerical worsening of the situation with actual housing delivery at south Winchburgh making up for a reduction in housing numbers on undeliverable land at East Broxburn.
123. It may also be possible as a result of such a move to re-prioritise certain infrastructure items at Winchburgh thus improving overall financial viability and deliverability for all involved.

Linlithgow

124. The Main Issues Report seeks to identify preferred sites for residential development in Linlithgow now that the Strategic Development Plan has removed the area of restraint restriction on the settlement. RTL / HET have no objection to the delivery of new residential development in Linlithgow in principle. However, the settlement has an environmental, community and infrastructure capacity that should not and / or cannot be breached given its historic significance. The contribution that Linlithgow may make to the overall additional housing requirement, whilst, important, is not significant in numerical terms. This is also

highly dependent on sufficient education provision being made available to accommodate development which is both complicated and time bound.

125. Outwith its own two year affordable housing programme, the Council has no reserve of land available to come forward to fill the short-medium term housing land gap that would improve the five year housing land requirement position.

Phasing

126. From the above, the proposed phasing of new housing development as set out in the Main Issues Report is unacceptable as this simply exacerbates the five year housing land supply situation.

127. An example of this is the restriction placed by the Main Issues Report on development over and above that currently consented at Winchburgh which prevents release of further land until beyond 2019. This must be removed.

128. Given the unparalleled success of Winchburgh in terms of housing completion rates with six house builders either on site, or due to commence development in the next six months, it is clearly a highly marketable and deliverable location. The delivery of major new strategic infrastructure, including new schools and a railway station, will only improve this situation.

129. Since October 2012 there have been over 100 dwellings completed by four national house builders, over 70 of which are occupied, with a further 40 under construction in any one month. There is no question of deliverability.

130. The settlement has clear environmental capacity to grow beyond the boundary that will be created by the development that currently has permission and is under construction. Housing developers that are currently onsite have enquired about further development plots and other national house builders are interested in establishing there. As such, there is no question of marketability and deliverability. There is no argument to be made against the fact that additional land identified for development at Winchburgh over and above that set out as preferred in the Main Issues Report could not come forward in the short-medium term.

131. The delivery of additional residential development in Winchburgh in the short term has significant benefits to the Council. It will slow down the annually increasing five year housing land supply deficit in the short term. It will make significant additional early contributions to

the provision of new infrastructure such as schools, thereby, reducing third party risk on delivery. It will create long term defensible boundaries for the settlement. It will cement Winchburgh as a sustainable settlement.

132. Land releases for development at Winchburgh thus far have resulted in fewer houses than either the most up to date masterplan or the Housing Land Audit projected or have programmed. As such, additional land release is required at Winchburgh just to maintain the status quo i.e. reach the 3,450 units originally envisaged by the Local Plan and necessary to meet supply requirements. If additional land is not identified at Winchburgh to meet this requirement then the housing land supply situation will only worsen.

133. Site programming is a fundamental requirement of the Local Development Plan preparation process to ensure a continuous supply of land deliverable in the short, medium and long term, as defined in paragraph 26 above, to comply with both five year housing land requirements and future housing land supply needs as set out in the Strategic Development Plan. For this purpose, land to the south of Winchburgh promoted through separate, but linked, representation should be programmed as follows –

Site EOI-0201 – short term (2016-21)

Site EOI-0202 – short term (2021-26)

Site EOI-0203 – medium term (2021-26)

Site EOI-0193 – medium term (2021-26)

Site EOI-0199 – medium – long term associated with depletion of Niddry Bing post 2025

Site EOI-0194 – long term (post 2026)

Site EOI-0200 – long term associated with depletion of Niddry Bing post 2025

10 Proposed Solution

134. The solution available to the Council, and endorsed through this representation, is for the further identification of Scottish Planning Policy / Strategic Development Plan compliant housing sites over and above allocations identified in the Main Issues Report.

135. It is suggested that the sites are identified using a Development Plan led approach. This should, as a minimum, allocate preferred and “reasonable alternative” sites identified in the Main Issues Report which, by Council admission, are generally Scottish Planning Policy and Strategic Development Plan compliant. Further land to the south of Winchburgh should also be identified for mixed use, including residential, development as part of this.

136. The scale and nature of these sites would comply with the national presumption in favour of sustainable economic development, not place significant strain on local infrastructure and deliver housing completions within the short term following Local Development Plan adoption – anticipated in 2016. This approach will “front load” housing completions in the short term thereby addressing the five year housing land supply shortfall, at least in part, identified above and remedying the wider housing supply problem in the Council area. It is the only realistic means by which housing completion rates will increase in the short term and the only way to slow down or stop the ongoing failure in five year housing land supply by the end of the first ten year period of the Strategic Development Plan. It will also provide medium-long term certainty to the Council, community, landowners and developers over future growth at Winchburgh.

137. From that, the restriction placed on the development of further land at Winchburgh until after 2019 must be removed. Furthermore, additional land of a scale that is deliverable in the short term must be identified at Winchburgh in line with the solution set out above to deliver housing completions in the short term. Additional allocations confirmed in the Local Development Plan would allow planning applications to come forward that could result in housing completions on these sites within the short, medium and longer term.

11 West Lothian place-based Green Networks: Local Development Plan: background paper

138. RTL / HET support the principle of the creation and protection of green networks throughout the West Lothian Council area. With regard to Winchburgh, it must be noted that the Union Canal is both an urban and rural man made structure. The Canal setting is a period of change at this time resultant from the strategic expansion of Winchburgh to the north with the proposed construction of a Canal basin, new bridges across it and an urban landscaped edge adjacent to it. The high quality mixed use development taking place to the north of the town as it affects the Canal could, and should, be replicated to the south as well.

139. The proposal put forward through the separate paper to this submission seeks to actively enhance the setting and function of the Canal between Winchburgh and East Broxburn. Pulling the proposed northern urban edge of the East Broxburn portion of the Core Development Area south towards the settlement and allowing for limited additional mixed use development to the south of Winchburgh has the following green network advantages –

- Creation of a wider area of open space between the two settlements than currently proposed

- A reduction in both actual and perceived coalescence between the two settlements
- The opportunity to create formal open space in the form of a Heritage Park style development recognising and celebrating the history of the two settlements that will ensure the permanency of that separation distance
- Creation of a high quality landscaped urban edge / transition zone to the Canal as it leaves Winchburgh heading south through master planned mixed use development of a scale appropriate both to the settlement as a whole and the immediate surrounding area south of it.

140. Overall, the net effect would be a positive impact on the Canal and surrounding area at this point. This must be taken into consideration in the finalisation of any green network requirements for the Union Canal as it leaves Winchburgh.

12 West Lothian Landscape Character Classification: Local Development Plan: background paper

141. This Background Paper requires to be updated to take account of the relevant requirements set out in the latest Scottish Planning Policy of 2014.

142. It is noted that there is no reference in this document to the ongoing landscape changes that are being, and will continue to be, brought about by the strategic expansion of Winchburgh that will affect Landscape Unit 22.

143. It is noted that, in relation to Landscape Unit 15, to the south of Winchburgh, there are no constraints upon the ability of that area to accommodate further appropriate scale mixed use development. The scale of surrounding Bings and the location adjacent to the urban edge of the settlement would minimise any impact of the scale proposed.

13 Conclusion

144. In conclusion, RTL / HET have made the representations outlined above to the West Lothian Council Local Development Plan Main Issues Report as published for public consultation purposes by the Council.

145. These seek to ensure the allocation and short, medium and long term delivery of land for housing to meet actual requirements and address the housing land supply shortfall in the Council area at this time. Winchburgh is prioritised for the identification of such land and sites to the south of the settlement have been identified separately to enable this to happen.

146. The Proposed Plan emerging from the Main Issues Report, as a priority must –

- Take full account of up to date Scottish Government requirements on housing land supply and maintenance of at least a five year housing land supply at all times
- Allocate sufficient land to address the ongoing current failure to maintain at least a five year housing land supply at all times.
- Re-programme the delivery of sites such as Westfield and East Broxburn to reflect accurate housing delivery expectations thus releasing infrastructure capacity in the short and medium terms for additional land to meet housing requirements at Winchburgh
- Allocate, as a minimum and in addition to the preferred site, Council site EOI-0201 for mixed use, including residential, development
- Adjust the boundary of the current East Broxburn portion of the wider Core Development Area to reflect deliverability and allocate additional land for mixed use development to the south of Winchburgh for mixed use development, including housing, which is the subject of separate representation that would deliver completions in the short, medium and long term.

**Representation to West Lothian Council Local Development Plan
Main Issues Report**

**Non-allocation of land at South Winchburgh / proposed adjustment
to East Broxburn Core Development area boundary**

Regenco Trading Limited & Hopetoun Estates Trust / Aithrie Estates



October 2014

Contents

- 1. Introduction**
- 2. Countryside Belt between Winchburgh and East Broxburn**
- 3. Non identification of land south of Winchburgh**
- 4. Site EOI-0201 – Northern portion of Niddry Castle Golf Course**
- 5. Sites EOI-0202 and EOI-203 – Land south of Craigton Park**
- 6. Rejection of expanded East Broxburn Core Development Area**
- 7. Representation to the existing East Broxburn Core Development Area north eastern boundary**
- 8. Conclusion**

Introduction

1. PPCA Ltd and Peter PC Allan Ltd have been instructed to make a joint submission on behalf of Regenco Trading Limited and the Hopetoun Estate Trust / Aithrie Estates respectively to the West Lothian Council Local Development Plan Main Issues Report published for consultation purposes in August 2014 to the non-allocation of land to the south of Winchburgh. The following Report sets out the details of representations lodged.
2. This representation should be read in conjunction with the joint representation on housing land supply.

Countryside Belt between Winchburgh and East Broxburn

3. Representation is lodged to the boundary of the Countryside Belt between Winchburgh and East Broxburn as set out in the current adopted Local Plan. The boundary, as currently drawn, is inappropriate. It should be adjusted to accommodate limited mixed use development to the south of Winchburgh as supported by planning permission 1012/P/05 in its accompanying Masterplan and on the site of the Niddry Castle Golf Course and extended to remove the northernmost portion of the current Broxburn Core Development Area for reasons set out below.
4. The adopted West Lothian Local Plan sought to preserve a “green corridor” between Winchburgh and East Broxburn as part of the wider Core Development Area to avoid coalescence and allow the two settlements to retain their separate identities (paragraphs 7.79-81). As part of this, the Winchburgh and East Broxburn developers were to jointly prepare a countryside management plan for the area. This would include formation of a Heritage Park, landscaping, a paths network, car park and interpretative facilities.
5. The Winchburgh developers sought to engage with the East Broxburn developers in 2009 to prepare the joint management plan referred to above but, as noted at the time with the Council, no engagement was forthcoming. As a result, the planning permission for the strategic expansion of Winchburgh was issued and has been implemented without a joint management plan in place for the land to the south of the settlement.
6. The most up to date proposals put forward by developers at East Broxburn make no reference to creation of any significant formal or informal open space areas between Winchburgh and East Broxburn. As such, there is considerable risk of coalescence as a

result of the north-eastern most boundary of the Broxburn Core Development Area allocation adjacent to the City of Edinburgh Council boundary.

7. The Main Issues Report recognises the need for a review of the Local Plan Countryside Belt Policy noting that this is necessary light of other policy guidance, the findings of the West Lothian Local Landscape Designation Review and associated background papers. The Main Issues Report states that the Council will consider combining policies Local Plan Policies ENV22 and ENV23 into a single policy.
8. The Countryside Belt to the south of Winchburgh and north of East Broxburn requires to be adjusted to take into account development opportunities and more proactively prevent coalescence between the two settlements. This is in line with SESPlan Strategic Development Plan Policy 13 (Other Countryside Designations) which allows Local Development Plans to review and justify additions or deletions to other countryside designations fulfilling a similar function to those of the Green Belt as appropriate. Strategic Development Plan Policy 13 also notes that opportunities for contributing to the Green Network proposals should also be identified in these areas.
9. A review of the Countryside Belt between Winchburgh and Broxburn as set out below will, in line with Strategic Development Plan Policy 13 –
 - maintain the character and landscape setting of the two settlements;
 - more pro-actively avoid coalescence than at the current time by increasing the actual separation distance between the north and south urban edges of the two settlements;
 - formalise part of that open space through the creation of a Heritage Park thus preventing significant future built development;
 - address the failure to reach agreement with East Broxburn development interests on the delivery of a countryside management plan thus removing the need for such an arrangement
 - continue to direct planned growth to the most appropriate locations in both settlements; and
 - from a Winchburgh perspective, provide opportunities for access to open space and the countryside

Non identification of land south of Winchburgh

10. Representation is lodged to the non-identification of land for mixed use development to the south of Winchburgh as set out in the accompanying OPEN Landscape Study and site specific representations.
11. The Main Issues Report describes Winchburgh as a “large village which lies to the north of Broxburn, divided by the union canal running north to south. The village is in close proximity to Edinburgh and is earmarked for substantial housing development as part of the Winchburgh Core Development Area”. Land for almost 550 houses as the first phase of the wider strategic expansion of the town has been sold and residential development started in 2012. The strategic expansion of the settlement will bring major new infrastructure to Winchburgh including two new secondary schools, primary schools, a new town centre, roads, landscaping and associated works. Winchburgh has significant scope for additional growth beyond the current Local Plan allocation that, where properly managed, will not adversely affect the setting of the town as set out below.
12. The priorities for the settlement, as identified in the Main Issues Report, are as follows –
 - to implement the terms of the Winchburgh Core Development Area approved master plan;
 - provide community facilities to support anticipated levels of development associated with the Core Development Area;
 - upgrade local parks and amenity open spaces as identified in the Council Open Space Strategy 2010 and;
 - review settlement envelope
13. The identification of additional land, as identified below, will directly help to implement the Core Development Area masterplan by delivering funding for key infrastructure projects. It will provide additional community facilities and the opportunity to improve / enhance existing ones such as local park spaces. The Main Issues Report actively endorses a review of the settlement envelope.

Site EOI-0199 – Eastern portion of Niddry Castle Golf Course

14. Representation is lodged to the non allocation of the northern portion of the southern section of the Niddry Castle Golf Course (Council reference EOI-0199 (part) for mixed use, including residential, development as part of the medium – long term expansion of Winchburgh associated with the depletion of the Niddry Bing.
15. In landscape terms, the site is contiguous with the adjacent preferred alternative site detailed below and will form part of a wider area with similar characteristics following the removal of the Bing.
16. The creation of a significant formal landscape buffer along the southern edge of this site will maintain separation between an extended south Winchburgh urban edge and the northern edge of East Broxburn to the south. It will also address any concerns over the risk of any form of coalescence between the two settlements. The logical amendments proposed to the Countryside Belt between Winchburgh and Broxburn through this submission will allow for the identification of site EOI-0199 for mixed use development and protect and actively enhance the extent, role and function of the Belt at this location.
17. The site, as originally submitted to the Council Call for Sites exercise in 2012 measured approximately 31.2 hectares. The revised site area, taking account of mitigation proposed in the accompanying OPEN Landscape Assessment, covers an area of approximately 9 hectares. Subject to further detailed assessment, this has a residential capacity of circa 225 dwellings of a range and choice of sizes and tenures. The existing golf course would be relocated as part of any future development proposals. Site development can commence in the latter portion of the medium term Local Development Plan period (2021-26) in the knowledge of final Bing depletion details at that time.

Site EOI-0201 – Northern portion of Niddry Castle Golf Course

18. The Main Issues Report identifies the majority of the northern portion of the Niddry Castle Golf Course as a preferred alternative site for 250 housing units as part of its assessment of the submission made by Regenco Trading Ltd in 2012. It notes that the site is compliant with Scottish Planning Policy and the Strategic Development Plan.
19. The settlement appraisal contained in the Main Issues Report for the sites notes that it is currently part of the Countryside Belt. The Main Issues Report notes that the site is undulating albeit on a southerly slope and has defined boundaries. It is neither elevated nor exposed and is on the edge of the settlement. It notes proximity to the adjacent main

rail line. With appropriate boundary treatment these issues can be addressed and the site would form a logical expansion to the settlement of a scale that can be accommodated in this location. The overall urban edge of Winchburgh (set by residential development at Glass Road and the sewage treatment works to the west) would be pushed slightly south but maintain a significant separation distance from an adjusted Broxburn CDA boundary. It would not cause coalescence.

20. The Main Issues Report notes access as an issue. The Grontmij Study submitted as part of the Call for Sites exercise in 2012 for the Golf Course demonstrates that an alternative access to Castle Road is deliverable to the north of the site. This is not an issue in relation to site development.
21. The logical amendments proposed to the Countryside Belt between Winchburgh and Broxburn through this submission will allow for the identification of all of site EOI-0201 for mixed use development and protect and actively enhance the extent, role and function of the Belt at this location.

Sites EOI-0202 and EOI-203 – Land south of Craigton Park

22. The general area south of Craigton Park was specifically indicated in the Masterplan approved as part of the wider strategic expansion of Winchburgh for future mixed use development in 2012 (planning permission 1012/P/05). It has been endorsed as such by the Council through this masterplan process. There has been no change in circumstances since 2012 that would dictate otherwise. The strategy adopted by the Local Development Plan Main Issues Report runs contrary to that granted planning consent in 2012.
23. Collectively, the land in question is a logical and discrete expansion of the settlement to the south that is in keeping with the wider southern edge of the village and will not lead to coalescence of any form. It is proposed that this area would come forward for a mix of uses including residential, landscaping, open space and ancillary roads. Open space, in the form of the formal Heritage Park identified in the current Local Plan could be located at the confluence of the East Coast Main Rail Line, Union Canal and Niddry Farm – Overton Farm Road logically allowing formation of a park / interpretative area in the location that actual mining historically took place. It would, further formalise the open space between Winchburgh and Broxburn, thus ensuring the future of the Countryside Belt in this location. This is also in line with the Council intention that all development

sites allow opportunities for the integration of new green infrastructure as set out in Main Issues Report paragraph 3.187.

24. The area in question will not adversely affect the setting of Winchburgh and, together with an adjustment to the East Broxburn Core Development Area will permanently reduce the risk of coalescence between Winchburgh and East Broxburn. It is well contained within the landscape as demonstrated within the accompanying Landscape Assessment being located to the north of a natural ridge line along which runs the Niddry Farm – Overton Farm Road.

Rejection of expanded East Broxburn Core Development Area

25. Representation is lodged to the proposed identification of additional areas of land by the Main Issues Report for development purposes in addition to the East Broxburn proportion of the original Core Development Area boundary identified in the adopted Local Plan variously identified as EOI-1038c, EOI-0138d and EOI-0138f.
26. Both areas EOI-0138c and EOI-0138d negatively contribute to visual coalescence between Winchburgh and East Broxburn. The original northern boundary of the East Broxburn Core Development Area was drawn to prevent such coalescence occurring.
27. It is known that ground conditions adjacent to the Greendykes Bing are extremely poor due to a history of mining in the area thus negating the possibility of development on areas EOI-0138d and EOI-0138f. These are not shown as capable of accommodating built development in the most up to date East Broxburn Masterplan. The southern portion of the Bing is currently shored up, on a temporary basis, with railway sleepers to prevent it collapsing en masse into the Union Canal. This area has no prospect of accommodating development on that basis.

28. Development within area EOI-0138f will result in urban form on both sides of the Union Canal due south of the Greendykes Bing Scheduled Ancient Monument. This runs contrary to Main Issues Report paragraph 3.212 and the Council Stance on development adjacent to the Canal in the vicinity of Winchburgh and Broxburn. This paragraph specifically states –

“In the WLLP a number of new mixed use allocations were brought forward adjacent to the canal at Winchburgh and Broxburn and it was always recognised that the development of these sites had the potential to alter the character of the canal at these locations. On the whole, this was perceived as a positive outcome but there are, nevertheless, sections of the canal between Winchburgh and Broxburn which are more visually and environmentally sensitive to development, comprising as they do, an integral part of the countryside. This zone is currently afforded protection by a countryside designation, but to avoid further urbanisation, the council’s preferred strategy is not to bring forward any further land for urban development here.”

29. The Council’s preferred approach as set out on page 69 of the Main Issues Report specifically states that –

“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.”

30. Not only is the Council opposed to development in the vicinity of the Canal between Winchburgh and Broxburn but it also seeks to impose a specific landscape designation upon the area. This runs contrary and negates the identification of EOI-0138f for development purposes as shown on the Proposals Map.

31. The proposed allocation of these areas for development would allow development to take place right up to the base of the Bing which is a Scheduled Ancient Monument thereby adversely affecting its setting.

32. The Main Issues Report does not propose to increase housing numbers consequent on the identification of this additional land. This is considered inappropriate as the housing proposed for the East Broxburn Core Development Area could easily be accommodated within the existing red line allocation boundary in the adopted Local Plan with a competent and collective layout and design. This is not an efficient use of land for development and runs contrary to Scottish Planning Policy on that basis.
33. Furthermore, the latest reworking of the eastern portion of the Broxburn Core Development Area masterplan submitted for consideration by the Council in May 2014 has reduced housing numbers from 900 units to only 836 units on the eastern portion of the wider Core Development Area – a loss of 64 housing units. There is no need, therefore, to identify further land to accommodate development in this locality.

Representation to the existing East Broxburn Core Development Area north eastern boundary

34. The Council aspiration set out above for the creation and maintenance of a Green Corridor between Winchburgh and East Broxburn is supported by Regenco Trading Ltd and The Hopetoun Estate. However, this aspiration will be significantly eroded by the identification of land for mixed use development in areas EOI-1038c, EOI-0138d and EOI-0138f. Whilst it is acknowledged that the mixed use development may accommodate open space provision it is unlikely that this will be the case in any meaningful way given the apparent inability of the Broxburn Core Development Area allocation to deliver housing requirements within the current Local Plan allocation boundary.
35. Conversely, the identification of the land highlighted above south of Winchburgh will deliver the formal and informal open space, countryside access and interpretative facilities that the Council seeks to achieve through the current Local Plan. This negates the requirement for a formal countryside management plan.
36. Representation is lodged to the current north eastern Broxburn Core Development Area boundary as shown in the adopted West Lothian Local Plan. It is contended that the boundary is inappropriate in landscape terms and that built development in this location both actively encourages visual and perceived coalescence between Winchburgh and an expanded Broxburn and adversely affects the setting of the adjacent Design Garden & Historic Landscape to the east.

37. The latest iteration of the Broxburn Core Development Area masterplan produced and submitted to West Lothian Council in May 2014 shows the development of market housing along the eastern boundary of the allocation and almost to the northern most point of the northeast of the site. Whilst the housing itself may not be visible from Winchburgh to the north the perception of coalescence travelling between the two settlements is unacceptable. This is due to the significantly reduced distance between the urban edges of both as a result of the development proposed through the Broxburn Core Development Area masterplan. There is no direct means of restricting the northernmost extent of residential development within the Broxburn Core Development Area masterplan other than to pull back the allocation to a more defensible and less intrusive boundary. This is demonstrated in the OPEN Landscape Assessment that accompanies this submission which recommends a logical urban edge for an expanded Broxburn settlement.
38. The loss of land for residential development and the consequent loss in housing numbers as a result of the above amendment would be compensated for by the identification of land to the south of Winchburgh for mixed use development. The land in question to be lost would be retained as open space / agricultural land.

Conclusion

39. In conclusion, representation is lodged to the Main Issues Report seeking –
- Allocation of additional land at south Winchburgh for mixed use development including residential use and formation of a Heritage Park facility (specifically Council site references EOI-0199 (part), EOI-0201, EOI-202, EOI-0203)
 - Deletion of proposed allocations EOI-1038c, EOI-0138d and EOI-0138f as set out in the Main Issues Report
 - An adjustment on landscape / visual impact and coalescence terms to be made to the northeast boundary of the current East Broxburn Core Development Area as set out in the accompanying Landscape Report prepared by OPEN.