

MacGarvie & Co

15M
CHARTERED TOWN AND REGIONAL PLANNING

MIRQ 0250



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15 October 2014

Head of Planning
Planning Policy Team
West Lothian Council
County Buildings
High Street
Linlithgow EH49 7EZ

Dear Sir/Madam,

Main Issues Questionnaire – West Lothian Local Development Plan

I am jointly instructed by BARRATT HOMES and UPHALL ESTATES LTD, to submit representations to the Main Issues Report.

The representations promote a 200 housing site at Uphall.

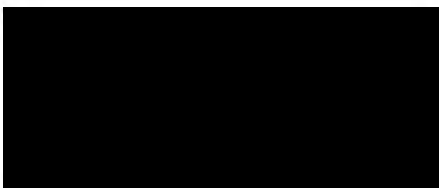
Please find attached :

- A completed Questionnaire
- Summary of the development proposal
- Copy of submission to the SES Plan (dated 16th December 2011)
- A copy of the submission to the "Expressions of Interest" procedure by West Lothian Council (dated 3rd May 2011)

It is requested that the Council acknowledges that this proposal is a viable and effective housing site with tangible benefits to the local economy and promotes the site for circa 200 houses in the forthcoming Local Development Plan.

I would be pleased to discuss at your convenience.

Yours faithfully



Planning & Development Consultancy • Residential • Renewables • Commercial • Leisure • Industrial

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West Lothian Local Development Plan Main Issues Questionnaire

FOR OFFICIAL USE ONLY

Unique Ref No:

Date:



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 wldp@westlothian.gov.uk by no later than **5pm on Friday, 17 October 2014**.

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

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

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

Name	J.S. MacGARVIE	<input checked="" type="checkbox"/> Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input type="checkbox"/> Ms (please tick as appropriate)
Organisation (where applicable)	MACGARVIE & CO LTD (UPHALL ESTATES LTD & BARRATT HOMES)	
Postal address	LITTLEHILL DUNBLANE PERTSHIRE	
Postcode	FK15 9NU	
E-mail	smacgarvie and co @ OUTLOOK.COM	
Telephone	[REDACTED]	

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?

RESIDENTIAL DEVELOPMENT SHOULD BE COMPLEMENTED BY EFFECTIVE PROVISION OF EMPLOYMENT OPPORTUNITIES; BE SITED IN SUSTAINABLE LOCATIONS AND BE SUPPORTED BY VIABLE DEVELOPMENT INITIATIVES. SUCH IS THE CASE AT UPHALL ESTATES LTD / BARRATT HOMES.

Question 2

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

THE COUNCIL SHOULD CONCENTRATE ON THE RELEASE OF SITES WHICH ARE:-

- * IN SUSTAINABLE LOCATIONS / PUBLIC TRANSPORT
- * CAN BE DELIVERED WITHIN AN AGREED TIMETABLE / DEVELOPER BAKED
- * TANGIBLE COMMUNITY BENEFITS
- * VIABLE

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?

THE PRINCIPLE OF THE LDP IS ACKNOWLEDGED.
CONCERN IS EXPRESSED OVER CERTAIN DETAIL REGARDING "AFFORDABLE HOUSING" AND "INFRASTRUCTURE PROVISION."
(SEE LATER COMMENTS).

Question 4

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

IN TERMS OF RELEASE OF SITES FOR HOUSING, THE COUNCIL SHOULD FAVOUR SITES WHICH HAVE TANGIBLE BENEFITS AND READILY COMPLY WITH THE MAIN AIMS OF THE M.I.R.

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?

THE PROPOSAL BY UPHALL ESTATES LTD / BARRATT HOMES FOR THE SITE AT UPHALL PROVIDES FOR CLEAR EMPLOYMENT GENERATION, WHICH FULLY COMPLIES WITH THE COUNCIL'S ECONOMIC STRATEGY AND THE CREATION OF JOBS. THE CROSS SUBSIDY OF MONIES FROM THE DEVELOPMENT OF 200 HOUSES WILL DIRECTLY FUND EMPLOYMENT INITIATIVES ON THE ADJACENT SITE; ALL WITHIN THE SAME OWNERSHIP. (THIS EXCLUDES THE ECONOMIC BENEFIT ASSOCIATED WITH 200 HOUSES).

Question 6

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

YES NO Don't know

Do you have any additional comments?

THE COUNCIL SHOULD PROMOTE FLEXIBLE MIXED USES WITHIN / BORDERING EXISTING INDUSTRIAL SITES. THIS IS PARTICULARLY RELEVANT WHERE COMPATIBLE LAND USES CAN BE SATISFACTORILY PROMOTED. A CASE IN QUESTION IS THE DATED / REDUNDANT BUILDINGS AT THE MAIN ENTRANCE TO UPHALL INDUSTRIAL ESTATE. FLEXIBLE / COMMERCIAL LAND USES WOULD BE SUITABLE.

Question 7

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

THE PROPOSAL FOR THE SITE AT UPHALL IS CLEARLY LINKED WITH EMPLOYMENT GENERATION. THE DEVELOPMENT OF THE PROPOSED RESIDENTIAL SITE BY BARRATT HOMES WILL GENERATE FUNDS WHICH WILL BE CHANNELLED DIRECTLY INTO UPHALL INDUSTRIAL ESTATE. THIS IS A DIRECT ALTERNATIVE APPROACH AND IN THIS REGARD THE RELEASE OF THIS SITE FOR RESIDENTIAL USE SHOULD BE PRIORITISED.

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?

THERE IS A LIMIT TO EFFECTIVE EMPLOYMENT SITES IN WEST LOTHIAN. THE COUNCIL SHOULD FOCUS ON IMPROVING EXISTING SITES BY ALTERNATIVE APPROACHES SUCH AS THAT BEING ADVOCATED BY THIS SUBMISSION. THE LAND IS RECOGNISED IN PART FOR DEVELOPMENT HOWEVER ITS USE FOR HOUSING WOULD GENERATE FUNDS WHICH CAN DIRECTLY ASSIST EMPLOYMENT GENERATION.

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?

THE RELEASE OF LAND AT LINHOUSE FOR MIXED USES IS SIMILAR TO THAT BEING PROPOSED FOR THE SITE AT UPHALL. THE RELEASE OF LAND FOR RESIDENTIAL USE (200 HOUSES BY BARRATT HOMES) WILL ASSIST IN DIRECTLY FUNDING EMPLOYMENT OPPORTUNITIES BY THE OWNER OF UPHALL INDUSTRIAL ESTATE.

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?

NO COMMENT

Question 11

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

If not, why not?

What other locations would you suggest?

YES NO Don't know

Do you have any additional comments?

NO COMMENT.

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?

ANY APPROACH WHICH CREATES EMPLOYMENT AND REGENERATION SHOULD BE SUPPORTED.

A CASE IN EXAMPLE IS THE PROPOSED RESIDENTIAL RELEASE AT UPHALL. THE RESULTANT EXPENDITURE ON EMPLOYMENT GENERATION IN THE EXISTING INDUSTRIAL ESTATE (SINCE OWNERSHIP), ALONG WITH EASY PEDESTRIAN ACCESS FROM THE UPGRADED UPHALL RAILWAY STATION, CAN ASSIST AREAS WHICH REQUIRE REGENERATION, THROUGH IMPROVED PUBLIC ACCESSIBILITY.

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?

NO COMMENTS

Question 14

Do you have any other alternative approaches?

What are they and how would you make them work?

FURTHER DIRECT INVESTMENTS INTO UPHALL INDUSTRIAL ESTATE WILL ASSIST IN CREATING EMPLOYMENT OPPORTUNITIES. COUPLE THIS WITH IMPROVED PUBLIC ACCESS FROM UPHALL RAILWAY STATION (ADJACENT / 5mins WALK) AND AREAS WHICH REQUIRE REGENERATION CAN BENEFIT, THROUGH ENHANCED EMPLOYMENT AND ACCESSIBILITY OPPORTUNITIES.

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?

THE PROPOSAL TO BUILD 200 HOUSES BY BARRETT HOMES AT UPHALL WILL MAKE A SIGNIFICANT CONTRIBUTION TO THE EFFECTIVE HOUSING LAND SUPPLY BETWEEN 2019 - 2024. THERE WILL BE A RANGE AND CHOICE OF PRIVATE FAMILY HOUSES FROM 2 BED TO 4 BED. THERE WILL BE A 15% AFFORDABLE HOUSING (c. 30 UNITS). THE COMPLETION RATE IS EXPECTED THUS: 2016/17 - 25; 2017/18 - 35; 2018/19 - 35; 2019/20 - 35; 2020/21 - 35 2021/22 - 35.

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?

THE STRATEGY SHOULD BE TO CONCENTRATE ON SITES WHICH ARE SUPPORTED BY DEVELOPERS AND ARE OF A SIZE WHICH CAN BE READILY DELIVERED. CLOSE PROXIMITY TO A RAIL STATION IS A CONSIDERABLE ADVANTAGE. THE ABILITY TO PROVIDE ENHANCED BENEFITS, SUCH AS EMPLOYMENT OPPORTUNITIES, SUCH AS UPHALL, MUST BE CONSIDERED AS A SIGNIFICANT MATERIAL ADVANTAGE.

Question 17

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

ANY STRATEGY FOR HOUSING GROWTH REQUIRES TO BE FLEXIBLE. THERE ARE A NUMBER OF LARGE SITES IN WEST LOTHIAN WHICH MAY VERY WELL BE DELAYED IN TERMS OF DELIVERY. IT IS THEREFORE SENSIBLE TO PLAN FOR ADDITIONAL SITES, SUCH AS UPHALL.

Question 18

Do you have another alternative strategy?
What is it and how would you make it work?

THE COUNCIL SHOULD BE SYMPATHETIC TO SITES SUCH AS THE UPHALL PROPOSAL WHICH HAS SIGNIFICANT ATTRIBUTES AND CAN MAKE A SIGNIFICANT CONTRIBUTION TO THE EFFECTIVE HOUSING SUPPLY.

Question 19

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

THE COUNCIL SHOULD PRIORITISE SITES SUCH AS THIS UPHALL PROPOSAL. IT IS SUPPORTED BY BARQATT HOMES (200 HOMES + 15% AFFORDABLE). IT IS SUPPORTED BY DETAILED TECHNICAL INFORMATION. IT IS WITHIN 5 MINUTES WALK FROM A RAILWAY STATION. IT IS SET WITHIN A MATURE LANDSCAPE SETTING. IT WILL CROSS-FINANCE TANGIBLE PROJECTS IN THE UPHALL INDUSTRIAL ESTATE.

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?

IF HOUSING SITES ARE NOT BEING DEVELOPED THEN THEY SHOULD BE REMOVED AND REPLACED WITH VIABLE SMALLER SITES WHICH HAVE THE BENEFIT OF BEING SUPPORTED BY DEVELOPERS.

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?

SIMILAR COMMENT AS IN Q.20.

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?

IDENTIFY THE UPHALL SITE FOR HOUSING - CIRCA 200 UNITS

The Core Development Areas (paragraphs 3.74 - 3.76)

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?

THE COUNCIL SHOULD CONCENTRATE ON VIABLE SITES WHICH PROVIDE FOR A RANGE OF COMMUNITY BENEFITS AS OPPOSED TO SECULAR HOUSING DEVELOPMENTS.

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?

SIMILAR TO QUESTION 26

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?

CONSIDER BEFORE VIABLE SITES SUCH AS THE UPHALL / BARRATTS PROPOSAL FOR 200 HOUSES.

Heartlands, Whitburn (paragraphs 3.78 – 3.79)

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?

IF THERE IS ANY DOUBT OVER THE DELIVERY OF A HOUSING SITE, THE COUNCIL SHOULD CONSIDER ADDITIONAL VIABLE SITES, IDENTIFIED THROUGH THE M.I.R. PROCESS.

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?

AS PER QUESTION 26.

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?

AS PER QUESTION 26.

Linlithgow housing and the area of restraint (paragraphs 3.80 – 3.97)

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?

THE COUNCIL SHOULD CONSIDER SITES WHICH PROVIDE FOR ADDED COMMUNITY BENEFITS, FOR EXAMPLE UPHALL/BARRATT'S SITE. (200 UNITS).

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?

THE SEQUENTIAL TEST SHOULD REFLECT ALL SITES IN THE AREA.

Question 30

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

SIMILAR TO QUESTIONS 28/29.

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?

THE COST BENEFIT OF THIS PROPOSAL IS NOT PROVEN.

Deans South, Livingston: area for comprehensive re-development (paragraphs 3.98 and 3.100)

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?

THE HOUSING ALLOCATION CAN BE MORE BENEFICIALLY USED ELSEWHERE IN WEST LOTHIAN, NOTABLY UPHALL.

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?

THE ALLOCATION OF HOUSES SHOULD BE DIRECTED TO VAPAZL.

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?

AS PER QUESTION 32/33 REGARDING THE VIABLE AND EFFECTIVE SITE AT VAPAZL.

Affordable housing (paragraphs 3.101 – 3.107)

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?

SEE QUESTION 36/37.

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? **BARRATT HOMES / UPHALL ESTATES DOES NOT WHOLLY SUPPORT THE COUNCIL'S APPROACH TO THE PROVISION OF AFFORDABLE HOUSING. THE COUNCIL'S APPROACH MAY NOT READILY INCREASE THE SUPPLY, IF TOO RELIANT ON ONE METHOD OF DELIVERY. THE CURRENT POLICY IS BIASED TOWARDS COUNCIL HOUSE BUILDING. INSTEAD, SIMILAR TO OTHER COUNCILS, OTHER PROVIDERS, INCLUDING RSL'S AND INDEED PRIVATE DEVELOPERS, MUST PLAY A ROLE TO ENSURE THE TIMELY DELIVERY OF AFFORDABLE HOUSING IN WEST LOTHIAN, TO MEET ESTABLISHED NEED.**

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?

SEE QUESTION 36 ABOVE.

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? **BDW TRADING LTD / UPHALL ESTATES DO NOT AGREE WITH THE PREFERRED APPROACH TO INFRASTRUCTURE PROVISION AS THE STRATEGY RELIES ON PIECEMEAL DEVELOPER CONTRIBUTIONS VIA SUPPLEMENTARY GUIDANCE (SG) AND DOES NOT PROVIDE CERTAINTY FOR PROPOSED AND "WINDFALL" SITES AND HOW DEVELOPMENT IMPACTS RELATE TO INFRASTRUCTURE PROVISION AND THE LEVEL AND TIMING OF DEVELOPER CONTRIBUTIONS. THE COUNCIL AND INFRASTRUCTURE PROVIDERS NEED TO LIAISE WITH THE DEVELOPMENT INDUSTRY ON PROPOSED ALLOCATIONS EXPEDITIOUSLY, TO INFORM THE PROPOSED PLAN OF AN ACTION PROGRAMME WITHIN THE LDP. THIS WILL CLEARLY EXPLAIN ANY IMPACTS, ANY INFRASTRUCTURE REQUIRED, CAPITAL SPEND AND THE TIMING AND LEVEL OF DEVELOPER CONTRIBUTIONS. IN PARTICULAR, A PARTNERSHIP APPROACH BETWEEN THE HOUSING INDUSTRY AND THE COUNCIL IS REQUIRED TO ENSURE THAT PROGRAMME)... (CONT Q40)**

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?

SEE QUESTIONS 38 & 40.

Question 40

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

YES NO Don't know CONT. FROM QUESTION 38.

Do you have any additional comments?

PROGRAMMED.... HOUSING COMPLETIONS ARE ALIGNED WITH A PLANNED INFRASTRUCTURE INVESTMENT PROGRAMME. THIS PROGRAMME SHOULD NOT RELY ON PIECEMEAL DEVELOPER CONTRIBUTIONS AS THIS MAY NOT ENSURE DELIVERY.

INSTEAD ULC IS URGED TO FURTHER INVESTIGATE MORE INNOVATIVE CAPITAL INVESTMENT APPROACHES TO ENSURE THAT INFRASTRUCTURE PROVISION ENABLES RATHER THAN HINDERS DEVELOPMENT OVER TIME.

BARAAT HOME / UPHALL ESTATES WELCOME THE OPPORTUNITY OF PROVIDING FURTHER INPUT TO ULC WITH REGARD TO ALTERNATIVE APPROACHES, AS REQUIRED.

Question 41

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

Do you have any additional comments?

PLEASE REFER TO QUESTIONS 38 & 40.

AS AN ASIDE THE PROPOSAL FOR UPHALL PROVIDES FOR SIGNIFICANT BENEFITS, CREATING OPPORTUNITIES FOR DIRECT EMPLOYMENT GENERATION, WHICH CAN NOT BE MATCHED BY OTHER PROPOSED HOUSING RELEASE SITES.

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?

THE PROPOSED SITE BEING NOW PROMOTED BY BARRATT HOMES AND UPHALL ESTATES IS ADJACENT TO (5 MINS DIRECT FOOTPATH VIA PEDESTRIAN WALKWAY) THE UPGRADED UPHALL RAILWAY STATION. THIS SITE COMPLIES WITH SUSTAINABLE DEVELOPMENT AND SHOULD BE PRIORITISED AS A VIABLE HOUSING SITE 2019-2024.

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?

NO COMMENT.

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?

IDENTIFY THE SITE BEING PROMOTED BY BARRATT HOMES / UPHALL ESTATES FOR 200 HOUSES AT UPHALL.

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 subregional 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?

No Comment

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?

No Comment

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?

No Comment

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?

WLC ALREADY SUFFERS FROM A NUMBER OF 'BROWNFIELD' SITES WHICH ARE NOT VIABLE AT THIS JUNCTURE FOR DEVELOPMENT. THE COUNCIL NEEDS TO BE CIRCUMSPECT IN CHOOSING VIABLE SITES WHICH CAN BE DEVELOPED WITHIN AN AGREED TIME PERIOD. THE PROPOSED SITE AT UPHALL IS SUCH A SITE, WHERE IT IS SET WITHIN A NATURAL LANDSCAPE SETTING, WITH DIRECT FOOTPATH LINKS TO UPHALL RAILWAY STATION; AN EMPLOYMENT AREA ADJACENT AND A NETWORK OF FOOTPATHS.

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?

THE PROPOSED SITE AT UPHALL HAS NO AGRICULTURAL BENEFIT AND IS CLEARLY SUITABLE FOR DEVELOPMENT. THERE IS A DIRECT CORRELATION WITH EMPLOYMENT USES, PUBLIC TRANSPORT AND EFFECTIVE HOUSING PROVISION.

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?

See Question 49 previous.

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?

NO COMMENT

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?

NO COMMENT

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?

No Comment

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?

THE POLICY IS TOO RESTRICTIVE

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?

A MORE FLEXIBLE POLICY WILL REFLECT SCOTTISH GOVERNMENT GUIDANCE. REVIEW SUCH POLICIES RECENTLY ADOPTED BY PERT/KINROSS AND STIRLING COUNCILS.

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?

SEE Question 55 previous.

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?

THE POLICY IS TOO RESTRICTIVE AND CONTRADICTS RECENT PLANNING GUIDANCE

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?

PLEASE REVIEW THE RECENTLY ADOPTED POLICIES BY PERTH/KINROSS and STIRLING COUNCILS.

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?

GREEN NETWORKS ARE IMPORTANT BUT SHOULD NOT BE RESTRICTIVE IN NATURE.
URBAN FRINGE MATTERS SHOULD BE ADDRESSED BY SUITABLE GREEN BELT
BOUNDARIES / LANDSCAPING ~

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?

No Comment

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?

No Comment

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?

No Comment

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?

No Comment

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?

No Comment

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?

No Comment

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?

No Comment

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?

No Comment

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?

No Comment

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?

No Comment

The historical environment, cultural change and conservation area at Abercorn / Hopetoun Estate (paragraphs 3.199 – 3.203)

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?

No Comment

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?

No Comment

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?

No Comment

Bangour, Dechmont (paragraphs 3.204 – 3.208)

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?

No Comment

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?

RESTRICT NUMBERS TO ENSURE AN EFFECTIVE HOUSING SUPPLY.

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?

No Comment

Bangour General Hospital site (paragraph 3.209)

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?

No Comment

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?

No Comment

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?

No Comment

Archaeology and the Union Canal (paragraphs 3.210 – 3.212)

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?

No Comment

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?

No Comment

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?

No Comment

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?

No Comment

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?

No Comment

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?

No Comment

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?

No Comment

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?

No Comment

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?

No Comment

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?

No Comment

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?

No Comment

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?

No Comment

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?

No Comment

Waste management (paragraphs 3.243 - 3.246)

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?

No Comment

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?

No Comment

Additional information

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

THE FOLLOWING REPRESENTATIONS RELATE TO HOUSING GROWTH IN WEST LOTHIAN Q15 ONWARDS AND A REQUEST TO IDENTIFY THE SITE AT UPHALL AS AN EFFECTIVE HOUSING SITE FOR 200 UNITS, IN THE LOCAL DEVELOPMENT PLAN. (SETTLEMENT PLAN 3 & UPHALL - HOUSING DEVELOPMENT PROPOSAL).

THIS REPRESENTATION IS TO BE CONSIDERED IN CONJUNCTION WITH THE SUPPORTING INFORMATION PREVIOUSLY LODGED AS PART OF THE WLC CALL FOR SITES AND THE SES PLAN.

REPRESENTATION

THE PROPOSED HOUSING SITE EXTENDS TO SOME 30 ACRES. THE SITE IS WITHIN THE SAME OWNERSHIP AS UPHALL INDUSTRIAL ESTATE, WHICH IS IMPORTANT IN TERMS OF THE PROPOSED CROSS-FERTILIZATION OF RECEIPTS RECEIVED FROM THE SALE OF ANY CONSENT TO BARRATT HOMES. THE UPHALL SITE IS BEING JOINTLY PROMOTED BY BARRATT HOMES AND UPHALL INDUSTRIAL ESTATE.

CONT

CONT:-

THE SITE HAS BEEN SUBJECT TO THE FOLLOWING SPECIALIST ASSESSMENTS:-

- * LANDSCAPE ASSESSMENT (T&P LANDSCAPE ARCHITECTS LTD)
- * TRAFFIC ASSESSMENT (MCGREGOR + MCMAHON)
- * SITE LAYOUT / CONCEPT (GVA JAMES BARR)
- * ECONOMIC IMPACT ASSESSMENT (ROBERT TYM + PARTNERS)
- * PHASE 1 GEO-ENVIRONMENTAL (MCGREGOR + MCMAHON)

THE CONSULTANTS REPORTS CONCLUDE THAT THE SITE IS VIABLE AND EFFECTIVE. THE PROPOSED HOUSING SITE IS SUSTAINABLE BEING WITHIN 5 MINUTES WALK OF A RAILWAY STATION. THE SITE IS SELF-CONTAINED WITHIN A MATURE LANDSCAPE SETTING. THE SITE HAS ADEQUATE ACCESS / EGRESS AND ASSOCIATED FOOTPATH LINKS. THERE ARE NO GEO-ENVIRONMENTAL MATTERS WHICH WOULD PREVENT THIS SITE FROM BEING EFFECTIVELY DEVELOPED. THE SITE DUE TO ITS LOCATION HAS LIMITED AGRICULTURAL USE.

BARRATT HOMES IS PROPOSING A HOUSING DEVELOPMENT OF 200 HOMES, RANGING FROM 2-4 BED TERRACED AND DETACHED HOMES. THE DEVELOPMENT WOULD ALSO PROVIDE FOR 15% AFFORDABLE UNITS (C. 30 HOMES).

THE SITE COULD MAKE A SIGNIFICANT CONTRIBUTION TO THE EFFECTIVE HOUSING LAND SUPPLY IN WEST LOTHIAN THUS:-

- 2016/17 - 25 units
- 2017/18 - 35 units
- 2018/19 - 35 units
- 2019/20 - 35 units
- 2020/21 - 35 units
- 2021/22 - 35 units

AS AN IMPORTANT PART OF THIS PROPOSAL THERE IS THE CLEAR OPPORTUNITY TO PROVIDE SIGNIFICANT AND TANGIBLE ECONOMIC BENEFIT TO THE AREA.

THIS COMPRISES TWO MECHANISMS: FIRSTLY -

THE OWNER OF THE SITE AND ADJACENT UPHALL INDUSTRIAL ESTATE WILL INVEST FUNDS RECEIVED FROM THE SALE OF THE CONSENTED LAND THUS:-

1. DECONTAMINATION OF THE ASBESTOS CLADDING ON THE EXISTING INDUSTRIAL UNITS AT THE REAR (MOTORWAY) END OF THE SITE.
2. REPLACE THE EXISTING REDUNDANT OFFICES AT THE FRONT OF THE SITE WITH NEW TRADE COUNTER STALLER UNITS
3. DEVELOP THE 75,000sqft BUILDING WITHIN THE MAIN SITE FOR WHICH CONSENT HAS BEEN ISSUED.

CONT

Additional information

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

CONT:- IT IS FURTHER EMPHASISED THAT THERE IS NO FINANCIAL BORROWING AGAINST THE UPHALL INDUSTRIAL SITE. SIGNIFICANT PRIVATE MONEY HAS BEEN EXPENDED BY THE OWNER, IMPROVING THE SITE. IT CAN BE SEEN IN THE VARIOUS REPORTS THAT CONSIDERABLE PROGRESS HAS BEEN MADE IN JOB CREATION IN THE AREA. THE OPPORTUNITY TO UTILISE FUNDS FROM THE SALE OF THE HOUSING LAND TO BARRATT'S WILL FURTHER BOOST EMPLOYMENT PROSPECTS AT UPHALL.

THE SECOND ELEMENT OF ECONOMIC BENEFIT DERIVED FROM THE RESIDENTIAL DEVELOPMENT OF 200 HOUSES OVER A 6 YEAR PERIOD, COMPRISES :-

- A. WILL CREATE 48 DIRECT "TEMPORARY" CONSTRUCTION JOBS PER ANNUM.
- B. WILL CREATE A DIRECT GROSS VALUE ADDED ECONOMIC OUTPUT OF £2,639,282 p.a.
- C. WILL SUPPORT 72 INDIRECT AND INDUCED JOBS IN RELATED AREAS OF THE ECONOMY p.a.
- D. WILL CREATE AN INDIRECT GROSS VALUE ADDED ECONOMIC OUTPUT OF £3,717,157 p.a. IN OTHER AREAS OF THE ECONOMY - ESTIMATING A TOTAL GROSS VALUE OF £38,120,634 OVER THE BUILD PERIOD.
- E. WILL CREATE £1m OF TOTAL FIRST OCCUPATION EXPENDITURE IN THE ECONOMY AND OVER £3.6m OF ONGOING EXPENDITURE GENERATED BY NEW RESIDENTS.
- F. AN ESTIMATED £290,268 OF COUNCIL TAX REVENUE WILL BE GENERATED. PA.

Comments on the MIR package - other documents

END.

Should you wish to make any comments on the Environmental Report (SEA) or any of the background papers prepared in support of the MIR please use the template below, giving details of the relevant document(s) along with your comments.

Document name	Page number	Paragraph number	Comments
N/A.			THE SITE PROPOSED AT UPHALL BY BARRATT HOMES AND UPHALL ESTATES COMPLIES WITH THE PRINCIPLES OF THE SEA.

WEST LOTHIAN LOCAL DEVELOPMENT PLAN MAIN ISSUES REPORT - Equalities opportunities questionnaire

We ask that you complete the following Equal Opportunities Questionnaire in order that we can build an accurate picture of the make-up and diversity of the people and groups that our policies impact on, and to ensure that the way in which we carry

out our consultation is inclusive and not unwittingly discriminatory. If you are responding to this consultation, it would be helpful if you could complete the following questions.



Thank you for taking time to complete this questionnaire

MIRE 0250



Summary of Submission To The WLC Local Development Plan:

Main Issues Questionnaire On Behalf of

BARRATT HOMES and

UPHALL ESTATES LTD



MacGarvie & Co

CHARTERED TOWN AND REGIONAL PLANNING



Summary of Submissions

Introduction:

This representation to the West Lothian L.D.P Main Issues Report 2014, is made jointly between Barratt Homes and Uphall Estate Ltd.

The proposed development site for housing and the adjacent Uphall Industrial Estate are in single ownership. There is no bank borrowing against the proposed housing site or the Uphall Industrial Area.

The proposed site extends to some 30 acres and is sited in close proximity to Uphall Railway Station, which is a 5 minute walk via a direct existing footpath and underpass. Barratt Homes is promoting a 200 house development to include some 15% Affordable Housing.

The site has previously been promoted as an integral part of an employment and regeneration initiative at Uphall Industrial Estate, with submissions to both the SES Plan and the WLC "Call For Sites". (see attached)

The site can effectively be developed over a 6 year period with houses being available from 2016/17.

The Site:

The site extends to some 30 acres and is presently used for poor quality grass/grazing. The site is not part of any agricultural business and is of limited agriculture use.

The site is contained within an existing mature landscape and is a natural development site. The site has been subject to a number of specialist reports (As Attached – SES Plan).

- The Landscape Appraisal confirms that the site is bounded by an existing mature landscape and provides for an obvious residential development site. There are no restrictive flora/fauna which would prevent this site from being developed.
- The site has also been subject to a Transport Assessment. The assessment confirms that the site can be readily accessed off the main road with appropriate sight lines. In addition it is considered that the site is sustainable due to its direct footpath linkage with the adjacent Uphall Railway Station (5 minutes walk). The site is also directly linked into various footpath links in the area. The site is ideally located to public transport routes and complies with key employment and development strategies within the SDP and draft LDP.(As attached).
- The site has also been subject to a Phase 1 Geo Environmental appraisal which confirms that the site can be effectively developed.
- The site is not covered by any Environmental Policies. It is advocated that the site is EFFECTIVE AND VIABLE.



The Proposal:

Barratt Homes wish to develop some 200 units on the site, with a range of private family dwellings from 2 bedroom terraced to 4 bedroom detached homes. The development will provide for 15% Affordable Homes, some 30 units.

Extensive investigations have already taken place and the site is considered as viable and effective. Barratt Homes advise that the site can begin developed within 2 years, making a significant contribution to the effective housing supply in West Lothian to 2019 and 2024:-

2016/17 – 25 units

2017/18 - 35 units

2018/19 - 35 units

2019/20 - 35 units

2020/21 - 35 units

2021/22 - 35 units

The Economic Benefit:

The economic benefit resulting from the development of this site for housing is probably unique in West Lothian. The economic benefit is tangible and takes two forms:-

A. Cross-Funding from the sale of residential land toward specified Industrial/Employment related projects in Uphall Industrial Estate.

The Industrial Estate and the adjacent land promoted for housing is in single private ownership, with no bank borrowings. Three specific projects have been identified, for funding, namely:-

1. Removal of Asbestos Cladding on the existing industrial units parallel to the boundary next to the Motorway.
2. Replace the existing redundant offices at the front of Loaninghill with new Trade Counter, starter units.
3. Construct the 75,000 sq ft building for which consent has been secured.

The capex of these 3 projects is circa £4 m. The construction of the new units will create further business opportunities hence employment. The removal of the asbestos cladding will permit the remaining units to be occupied, again providing direct employment opportunities within Uphall Industrial Estate.

B. Economic Benefit of the proposed Residential Development

The development comprising up to 200 units and assuming a build period of 6 years:-

*Will create 48 direct temporary construction jobs per annum.

*Will create a direct gross value added economic output of £2,636,282 per annum.

*Will support 72 indirect and induced jobs in related areas of the economy per annum.



- *Will create an indirect gross value added economic output of £3,717,157 per annum in other areas of the economy.
- *Estimating a total gross value added of £38,120,634 over the build period.
- *Will create £1m of total first occupation expenditure in the economy and over £3.6m of ongoing expenditure generated by the residents of the development.
- *An estimated £290,268 of council tax revenue will be generated by the development per annum.

The Planning Policy:

The site in question is identified as preferred in part for employment use.

The site is of limited agricultural use due to its previous history, including the fact that it is isolated from any agricultural holding.

The site is self-contained due to the extensive Landscape/Tree Boundaries and development of this site will not cause coalescence.

The site is directly linked with the upgraded Uphall Railway Station (5 minutes walk). There are a number of footpath links as well as good public accessibility. It is advocated that the site is a sustainable development site.

Emphasis is now placed on identifying sites that are sustainable and deliverable.

The site is being promoted jointly by Uphall Estates Ltd and Barratt Homes. The site has been subject to extensive investigations and is considered viable and effective.

The site can be delivered within a short time period and will also provide tangible economic benefits.

The site can contribute to the effective housing supply.

Conclusions

It is advocated that this site has considerable merit in being identified as a Housing Site in the West Lothian Local Plan.

- The site has limited agricultural use due to its previous use and location.
- The site is in the single ownership of Uphall Estates Ltd
- The site is jointly being promoted by Barratt Homes and Uphall Estates Ltd for 200 homes, including some 30 Affordable Units.
- The site has already been subject to extensive surveys and is considered effective, viable and sustainable.
- The site can provide for added economic benefit through the financing of specified projects at Uphall Industrial Estate, as well as economic benefit directed related to the construction of 200 homes.

In conclusion this site can contribute 200 houses to the West Lothian Council Effective Housing land supply in the short term, as well as providing for tangible employment generating projects.



It is advocated that this site should be identified as an effective housing site, providing houses in 2016/17 over a 6 year period.

MacGarvie & Co

16th October 2014.



PROPOSED HOUSING
 DEVELOPMENT SITE
 FOR 200 HOUSES
 BY BARRATT HOMES
 AND UPHALL ESTATES.

15.X.14.

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