

MIR Expressions of Interest Sites: EO1 – 0038 Seafield Farm: EO1- 0040 Easter Breich Farm

I wish to make the following comments and ask for clarification.

In making these comments, I assume that the current WLLP 2009, especially maps, are of material consideration.

(1) Main Issue 6: Natural and Historic Environment

Both sites above are within ASLC designation.

3.172 states that the WL Local Landscape Designation Review informs the identification of sites in the LP.

In Background Papers, according to the WL LLDR, 1.9, NPF2 indicates “support for the Central Scotland Forest” and “presumption against development affecting trees and woodlands” as well as the “importance of landscape integration of new woodlands.” Also that ASLCs and the Countryside Belt are to “encourage protection and enhancement of landscape in these areas.” (WL LLDR 3.11)

This also supports the Guidance on Local Landscape Designations by SNH/Historic Scotland that designations should be made more “robust” rather than diminished.

Accordingly, I propose that development of EO1-0038, EO1-0040 is contrary to the above?

Please clarify.

(2) Environmental Report (SEA), albeit an interim assessment, informs this new development plan.

Under Biodiversity, sub-objectives include:

Protect species/habitats/wildlife corridors of nature conservation importance
Enhance the emerging green network.

Under Townscape and Landscape, sub-objectives include:

Protect character of landscape.
Avoid settlement coalescence.

Accordingly, I propose that development of EO1-0038, EO1-0040 is contrary to these sub-objectives of this report?

Please clarify.

(3) At present, the ASLC buffers Gavieside CDA along the Breich water as a wildlife corridor.

Although I understand that the Council has had to allocate greenfield sites in rural areas on the edge of settlements in CDAs to meet structure plan housing requirements in past years, the council “has obligations under the Nature Conservation (Scotland) Act 2004 to further the conservancy of biodiversity” (MIR 6/ 3.193) and to “local biodiversity sites identified along the river corridors across West Lothian.” (3.194).

Accordingly, I propose that development of EOI-0038 down to the Almond contravenes this?

**Also development of EOI-0040 towards the Breich burn contravenes this ?
Please clarify.**

Furthermore, "habitat specific policies on woodlands and watercourses are to be updated and carried through to the new LDP." (3.195)

**Again, , I propose that development of both EOI-0038, EOI-0040 opposes these policies?
Please clarify.**

(4)In Background Papers, WL Placed Green Networks comments on the need to protect and develop "habitat networks for species movement" (2.2) which EOI-0040 provides. The document also advises that LDP should avoid erosion of green networks but "seek to include spatial proposals...avoiding fragmentation of existing green networks."(5.2)

EOI-0038 and EOI-0040 would appear to meet the scale of "local level- minor scale network" according to the Green Network categories. As 7.14 cites that "Countryside Belt identified in the adopted local plan" should inform the green network, I assume this would also apply to ASLC designation on both sites.

**Accordingly, I propose that development of EOI-0038, EOI-0040 is contrary to this erosion of green networks?
Please clarify.**

To summarise:

I have identified

MIR 6: 3.172: 3.193: 3.194: 3.195

Environmental Report (SEA) Biodiversity: Townscape & Landscape sub-objectives

Background papers: West Lothian Local Landscape Designation Review: West Lothian Placed Green Networks; (also West Lothian Biodiversity Plan)

These – and by no means is this list exhaustive – seem to contradict greenfield intensity developments as expressed in sites EOI-0038 and EOI-0040 especially in ASLC designation.

This contradiction seems to be corroborated by the Council's own statement in the Consultation Response to Expression of Interest Sites.

Thus I submit that the development of these sites is untenable with the policies and principles within your own documentation for this consultation and therefore request that these sites be rejected.

In addition, I wish to raise one further issue with the planning department which is not directly linked to any detail within the MIR as far as I know.

It strikes me that sites such as EOI-0038 and EOI-0040 (as well as others such as EOI-0037) are the remnants of land of one farmer, in this case the Graham family of Gavieside farm.

I believe the Gavieside CDA has been zoned for the last 10-12 years. I have no knowledge or understanding of the process which is undertaken for land to be zoned: does some "compulsory purchase" process takes place(as it was known decades ago)?

What I wish to ask is this: what happens to the bits that don't fit in the CDA?

What role does the council have for responsible stewardship for the future of the remaining small areas of land, such as these sites?

Does the farmer bear the brunt of a type of "planning blight" over these fields which will remain outwith the large area of the CDA (in this case the Gavieside CDA) even tho' the livelihood from the area gradually ends and the bulk of his land becomes housing?

It is understandable why these sites become possible "off chance" targets for development when, in the long term, there will be no farm to oversee the remnants left.

Is there – or could there be – some informed process to see the land used wisely and appropriately (within all comments as presented in main submission above)? I recognise this is a moral/ethical question but I believe it is an important discussion for local communities and landowners alike.

Many thanks.

Yours faithfully

