Issue 2.6	Key Areas of Change Edinburgh and West	
Development Plan reference:	Key Areas of Change Edinburgh and West, page 22, para 3.19- 3.22 and Figure 3.3	Reporter: [Note: For DPEA use only.]

Body or person(s) submitting a representation raising the issue (including reference number):

Mr George Adam (037603) Aithrie Estates (032643) Barratt and David Wilson Homes (799597)Cockburn Association (037249) Corstorphine Community Council (929555)Corstorphine Old Parish Church (039627)Cramond and Barnton Community Council (803443) W S Crawford (040107) **Edinburgh Association of Community** Councils (040476) Hallam Land Management Ltd (037571) Linlithgow and Linlithgow Bridge Community Council (930033)

Mr Mike Martin (798523)
Muir Smith Evans (202101)
Murray Estates (930087)
Musselburgh Conservation Society
(927996)
Network Rail (928260)
New Ingliston Ltd (929755)
Park Lane (Scotland) Ltd. (039990)
Scottish Environment Protection Agency
(790577)
Stewart Milne Homes (930082)
Taylor Wimpey and Barratt Homes
(040609)

Wallace Land Investment and Management (930071)
Winchburgh Developments Ltd (832800)

Provision of the Development Plan to which the issue relates:

Key areas of change within Edinburgh and West.

Planning Authority's summary of the representation(s):

Mr George Adam (037603)

There is no proposed increase in employment sites planned for Linlithgow.

Aithrie Estates (032643)

States that section of Plan fails to distinguish between 'Strategic Growth' and 'Growth Beyond 2030'. Objects to paragraph 3.19 which wrongly refers to education issues as one which the developers at Winchburgh must address. This is a matter for the entire Winchburgh / Broxburn / Uphall CDA, with funding by West Lothian Council.

Barratt and David Wilson Homes (799597)

Given Livingston's role as principal service centre for West Lothian, a more flexible approach should be provided to allow for further suitable growth. The indication for strategic growth in this location should cover the whole of Livingston.

Cockburn Association (037249)

Plan should ensure that there is no coalescence between Winchburgh and

Kirkliston. Supports paragraph 3.11. Supports opportunities for housing within Leith Docks (Paragraph 3.16).

Corstorphine Community Council (929555)

Concerned about the impact of development proposed in the plan on traffic, air pollution, noise and environment, loss of open space and amenity. Concerned that the local infrastructure will prove inadequate.

Corstorphine Old Parish Church (039627)

Spatial strategy should have more regard for the large amount of housing land already allocated in West Edinburgh. Concerned that the road infrastructure, particularly the City Bypass and the A8 will not cope with development. Clear access is required to the airport. The Strategic Development Plan (SDP) should ensure essential social facilities are provided simultaneously with the additional housing. Considers that masterplans for large new housing areas are essential. Highlights that half the demand in Edinburgh is for affordable housing and this requires additional government funding. States that there are sites near public transport that would lend themselves to social housing. West Lothian has an over provision of housing land and could absorb demand from Edinburgh. Omit the 10% extra allowance for Edinburgh. Highlights it is important to respect the landscape and allow for pedestrian and cycle paths in the countryside. Public parks and green networks are important.

Cramond and Barnton Community Council (803443)

Supports green belt designations around West Edinburgh. Supports proposals to complete River Almond Walkway.

W S Crawford (040107)

Where infrastructure solutions can be provided, areas identified as longer term growth corridors should be able to deliver housing in the first period (2018-30). Land at Hatton Mains can provide a sustainable location for strategic growth in order to meet Edinburgh housing land requirements.

Edinburgh Association of Community Councils (040476)

The SDP is right to emphasise the importance of this area, but paragraph 3.21 is really rather weak. Needs to be early community and spatial planning interventions.

Hallam Land Management Ltd (037571)

Seeks strategic support for the longer term growth of the smaller settlements in West Lothian, including Blackburn. Paragraph 3.21 omits the strategic importance of Craigiehall. Figure 3.3 is simplistic and fails to recognise the importance of the A90 Corridor which is inconsistent with strategic road improvements set out in Table 6.1. Figure 3.3 omits the potential for rail improvements at Dalmeny. States that the opportunity to enhance landscape character around settlement gateways including a key opportunity for the completion of the River Almond walkway can only be properly delivered through development at Craigiehall.

Linlithgow and Linlithgow Bridge Community Council (930033)

Support removal of Linlithgow as area of restraint for housing.

Mr Mike Martin (798523)

Objects to development within Balerno as it does not make good use of areas with access to walking and cycling, and public transport.

Muir Smith Evans (202101)

Scotland's National Showground at Ingliston should be specifically recognised in paragraph 3.21, Section 4 and Table 4.1 and included within the West Edinburgh Business Cluster in Figure 3.3.

Murray Estates (930087), Stewart Milne Homes (930082), Taylor Wimpey and Barratt Homes (040609)

Does not support the graphical depiction of the spatial strategy in the Key Diagram in Figure 3.1, as it is not reflective of the locations in and around Edinburgh that present sustainable locations for housing. The locations identified for Strategic Growth 2018 - 2030 are similar or smaller than the Strategic Development Areas in SESplan 1. SESplan 2 does not reflect the modifications made to SESplan 1. The land identified as the Edinburgh and West Strategic Growth Area (SGA) has been reduced compared to that identified within the West Edinburgh Strategic Development Area (SDA) identified in SESplan 1. The vast majority of land to the west of Edinburgh is excluded from the growth area.

There is no basis for Edinburgh Garden District to have been excluded from the West Edinburgh SDA. The Edinburgh and West Strategic Growth Area 2018 - 2030 boundary should be extended to include the land known as Edinburgh Garden District due to its accessibility, infrastructure, land availability and development capacity, Ratho, Kirkliston,

Musselburgh Conservation Society (927996)

Direction should be given to the need for regeneration in existing settlements in West Lothian. The Plan should designate new mixed use and mixed tenure communities, on transport corridors, including extensions of the tram, and delivered by public sector. Studies should identify possible locations for new settlements and the mechanisms for their delivery.

Network Rail (928260)

The name of 'Gogar Rail Interchange Station' should be changed to 'Edinburgh Gateway Station'.

New Ingliston Ltd (929755)

Supports the International Business Gateway forming part of the Edinburgh and West spatial strategy for strategic growth in the period 2018 - 2030 and beyond. Supports the focus on placemaking within the spatial strategy. Welcomes the recognition in paragraph 3.21 to the development of a masterplan. Clarifies that the masterplan will help to deliver development in the short term, as well as long term. Needs to be further recognition and reinforcement of the need to ensure that the masterplan shall include the six principles of placemaking including mixed use. A mono-use business park is not appropriate and would not comply with NPF3 or wider national policy objectives. The Edinburgh Local Development Plan (LDP) examination Reporter's Report confirms that there is capacity within the site for other uses.

Park Lane (Scotland) Ltd. (039990)

Para 3.21 omits the strategic importance of Ratho. Fig 3.3 is simplistic and fails to recognise the importance of the Glasgow Road / M8 Corridor which is inconsistent with strategic road improvements set out in Table 6.1. Paragraph 3.3 underestimates the potential for growth from rail improvements at Gogar Interchange and the extension of the tram to Newbridge. States that the opportunity to enhance landscape character around settlement gateways including a key opportunity for the completion of Union Canal can only be properly delivered through development at Ratho North.

Scottish Environment Protection Agency (790577)

Object to the Key Diagrams and Figures, as the indicative areas for growth include areas of flood plain and flood risk.

Wallace Land Investment and Management (930071)

The spatial strategy, beyond year 12 and up to year 20, should provide an indication of the possible scale and location of housing land, including by LDP. Requests that the Spatial Strategy Assessment of the areas within Edinburgh and West be updated in the light of the proposed spatial strategy prior to examination of the Proposed Plan. The Areas numbered 1 to 30 in Appendix A -The Updated Spatial Strategy Assessment of the Supplementary Guidance Technical Note should continue to be adopted in the Proposed Plan and referred to in paragraph 3.1. This should include the M9, M8 and South West Edinburgh Corridors which should be prioritised in the Key Area of Change Edinburgh and West.

There is no reference in paragraph 3.19 to strategic growth within Linlithgow (Area 6). The emerging LDP allocates substantial growth in this settlement.

The Supplementary Guidance Technical Note (November 2013) identifies that both North West Edinburgh (Area 9) and South West Edinburgh (Area 11) are capable and appropriate to accommodate future growth in Edinburgh.

Figure 3.1 and 3.3 should reference Strategic Growth 2018-30. The rail station at Curriehill has the potential to support Strategic Growth and should be identified in the Proposed Plan (paragraph 3.22).

The Long Term Growth Corridors 2030+ do not identify any location or scale of future growth for the period up to 2038. This should be clarified in paragraph 5.13, explaining the priority areas in each LDP required to meet the estimated 44,000 homes.

Winchburgh Developments Ltd (832800)

The completion of a new railway station is not a key requirement in the delivery of an expanded settlement at Winchburgh. Without a Council led delivery strategy for the non-denominational secondary school at Winchburgh the development strategy of the extant and emerging LDP cannot be implemented resulting in a severe shortfall of housing supply in that Council area.

Modifications sought by those submitting representations:

Aithrie Estates (032643)

Add second line to Paragraph 3.21: 'and development within the long term growth corridor'. The paragraph should be renamed paragraph 3.19 and the remaining paragraphs re-numbered. Amend the wording in paragraph 3.19 to refer to education responsibilities being entire Winchburgh / Broxburn / Uphall CDA, with funding by West Lothian Council.

Barratt and David Wilson Homes (799597)

Amend Figures 3.1 Key Diagram and 3.3 South West to remove specific blue dotted hatching and replace with dotted circle around whole settlement of Livingston.

Cockburn Association (037249)

Review whether growth proposals comply with Placemaking Principles. Make reference to greater weight being given to the Placemaking Principles during decision making.

Corstorphine Old Parish Church (039627)

10% generosity proposed for Edinburgh housing figure could be omitted.

W S Crawford (040107)

Amend Figures 3.1 Key Diagram and 3.3 Edinburgh and West to identify A71 corridor and land at Hatton Mains for strategic growth.

Hallam Land Management Ltd (037571)

Request that an additional sentence is added to paragraph 3.19 on page 22. 'The smaller settlements in West Lothian may also provide for additional growth through regeneration and new development'. Figure 3.3 Edinburgh and West on page 23 of the Proposed Plan should also be modified to reflect this change, as should the Key Diagram (Figure 3.1) on page 13. Para 3.21 (page 22) should be modified to include Craigiehall. Fig 3.3 to recognise the A90 Corridor. Para 3.3 to include rail improvements at Dalmeny.

Muir Smith Evans (202101)

Modify paragraph 3.21, Section 4 and Table 4.1 and the West Edinburgh Business Cluster in Figure 3.3 to include Scotland's National Showground.

Murray Estates (930087)

Amend Figure 3.3 Edinburgh and West to extend the boundary of the Strategic Growth Area 2018 to 2030 to the Edinburgh to Glasgow Central railway line as the southern boundary, to include Edinburgh Garden District.

Musselburgh Conservation Society (927996)

No modification specified, representation suggests that growth corridors in West Lothian should be redesignated 'growth and regeneration corridors'. Allocation of land should be redirected from Edinburgh and East Lothian to West Lothian.

Network Rail (928260)

Change 'Gogar Rail Interchange Station' to 'Edinburgh Gateway Station' in paragraph 3.22 (page 22).

New Ingliston Ltd (929755)

Requests that the following paragraph be included in the Proposed Plan (paragraph 3.21): 'SESplan will support IBG as a development opportunity in the short and long term to establish a successful business-led city extension which fulfils its potential for international investment, new jobs and high quality of place (as per NPF3, page 13) that shall be business led with mixed uses including commercial and residential. The quantum of each use shall be established in subsequent masterplans'.

Park Lane (Scotland) Ltd (039990)

No modification specified, representation indicates that paragraph 3.21 should be modified to include Ratho, and Fig 3.3 be modified to recognise the Glasgow Road / M8 Corridor and paragraph 3.3 to include rail improvements at Gogar and extension of tram to Newbridge.

Scottish Environment Protection Agency (790577)

Amend Figure 3.3 with areas of flood plain and flood risk removed or, if included, with proposals for actions which will avoid increased flood risk to or from sites to which development is being directed.

Stewart Milne Homes (930082), Taylor Wimpey and Barratt Homes (040609)
The Edinburgh and West Strategic Growth Area should be significantly extended and include Ratho and Kirkliston.

Wallace Land Investment and Management (930071)

Add sentence to paragraph 3.19: 'The priority areas for Strategic Growth and the Long Term Growth Corridors are as follows: Area 6 (M9 Corridor); Area 8 (M8 Corridor); and Area 11 (South West Edinburgh)'. Add sentence to the end of paragraph 3.19: 'Linlithgow will accommodate further development to help deliver the upgraded junction to the motorway as set out in the Action Programme'. Add sentence to the end of paragraph 3.22: 'There is potential to upgrade Curriehill Station to deliver a transport interchange to support further development at a sustainable transport node'. Paragraph 5.13 should be expanded to provide further guidance of the scale and location of growth within the each of the respective LDPs.

Winchburgh Developments Ltd (832800)

Amend paragraph 3.19 to read as follows: 'The completion of a new railway station is one element in the delivery of an expanded settlement at Winchburgh in West Lothian, with the potential to accommodate over 3,000 homes and additional employment land. In order to progress the growth of the settlement beyond its first phase, it is for West Lothian Council to now deliver a comprehensive funding solution to enable new education infrastructure that includes Council funding and reasonable and appropriate developer contributions'.

Summary of responses (including reasons) by Planning Authority:

Mr George Adam (037603)

Linlithgow is not identified in Table 4.1 as a Significant Business Cluster. However, paragraph 4.6 highlights that LDPs will also consider whether to identify local business clusters. Identification of clusters at a local level can ensure the alignment of employment uses with housing and infrastructure, including sustainable travel networks. **No modification proposed.**

Aithrie Estates (032643)

SESplan disagree that this section needs to specifically distinguish between 'Strategic Growth' and 'Growth Beyond 2030'. This is set out in the spatial strategy paragraphs 3.1 - 3.4. There is no need for repetition. **No modifications proposed.**

Requirements for the developer of the new school are set out in the planning consent and supporting Section 75 Agreement. The delivery of the new school is to be at developer expense. **No modifications proposed.**

<u>Barratt and David Wilson Homes (799597), Hallam Land Management Ltd (037571), Murray Estates (930087), Park Lane (Scotland) Ltd (039990), Stewart Milne Homes (930082), Taylor Wimpey and Barratt Homes (040609), Wallace Land Investment and Management (930071)</u>

SESplan disagree that the Plan should specify priority areas for strategic growth beyond 2030. As required by paragraph 118 of Scottish Planning Policy (SPP) (ASD06), the Proposed Plan identifies the amount and broad location of land which should be allocated in LDPs to meet the housing land requirement.

In the SESplan area over the period 2018 - 2030 strategic growth will be largely met by land already identified in existing and proposed LDPs. Figure 3.1 Key Diagram identifies the broad location of this as Strategic Growth 2018 – 2030. Strategic Growth Areas are not the same as Strategic Development Areas (SDAs). SDAs were required to direct broadly where LDPs should look to allocate the significant level of additional housing land to meet the housing land requirements of SDP1. As is clear in paragraphs 3.1, 3.2, 5.8 to 5.10 and Housing Background Paper Chapter 11, there will be far fewer additional housing land allocations to meet the housing land requirements set out in Table 5.2 (ASD22). At this time, only Edinburgh is expected to potentially require additional house allocations. It will be for the Edinburgh LDP2 project to establish the details including the potential for brownfield development. As set out in paragraph 5.10, for all SESplan member authorities the level of additional housing land to be allocated, if any, will depend on the estimates of housing land at the time of LDP preparation in line with SPP paragraph 117 (ASD06).

Paragraph 5.9 directs Edinburgh to give priority to brownfield sites in the urban area within the green belt inner boundary before other sites to meet any shortfall to the housing land requirement when preparing the LDP. Therefore the SDAs in SDP1 are no longer required and have not been carried forward into the Proposed Plan in that form. The broad locations identified as Strategic Growth Areas – the annotations have no exact boundaries – they represent land allocated for development in existing and proposed LDPs, including land identified in SDAs in LDPs subsequent to SDP1. Therefore there is no justification for Strategic Growth

Areas in Figures 3.1, 3.2 and 3.3 to be extended to cover the area known as the Garden District, Ratho or Kirkliston as none of these locations have significant development allocations in an adopted LDP. None of these locations are brownfield sites in the urban area within the green belt's inner boundary. References to the Spatial Strategic Assessment that accompanied SDP1 are out of date (ASD71). The Main Issues Report Spatial Strategy Technical note contained an analysis of environmental and infrastructure constraints and capacities by housing market area (ASD37).

In compliance with SPP paragraph 118 (ASD06), beyond 2030 the Proposed Plan provides an indication of the possible scale and location of housing land as set out in paragraphs 3.3, 3.4, 5.13 and Table 5.3. This refers to growth being directed to locations in and around Edinburgh, locations along Long Term Growth Corridors and settlements within Rural Growth Areas. If required on the basis of future assessments, subsequent strategic plans will identify more specific locations for further strategic growth. **No modifications proposed.**

Cockburn Association (037249)

SESplan disagrees that the Proposed Plan should review the compliance of growth proposals with Placemaking Principles. LDPs will be guided by the Placemaking Principles set out in section 3 of the Plan. The Placemaking Principles are also referenced in the spatial strategy paragraphs 3.5 and 3.6. **No modifications proposed**.

Corstorphine Community Council (929555)

SESplan notes that no modification is requested but responds that for the next 12 years the need for strategic growth will be largely met by land already identified in existing and proposed LDPs. Figure 3.1 Key Diagram identifies the broad location of this as Strategic Growth 2018 - 2030 and includes land in West Edinburgh. The Proposed Plan requires that development should take account of the Placemaking Principles set out at Table 3.1. **No modifications proposed.**

Corstorphine Old Parish Church (039627)

Representations on generosity are responded to under Issue 8 Increasing Housing Delivery. **No modifications proposed.**

Cramond and Barnton Community Council (803443)

Following consultation at the Main Issues Report, SESplan have rationalised and enlarged the Edinburgh and West Green Network Area to form a larger, cross boundary area which includes the River Almond. **No modification proposed.**

W S Crawford (040107)

SESplan disagrees that the Key Diagram 3.1 and Figure 3.3 (Edinburgh and West) require to be amended to reflect the growth potential of Hatton Mains. The Key Diagram and Figure 3.3 Edinburgh and West identify Strategic Growth Areas and Long Term Growth Corridors. It is not the purpose of the Key Diagram to identify the extent of individual sites. **No modifications proposed.**

Edinburgh Association of Community Councils (040476)

Paragraph 3.5 of the Proposed Plan requires SESplan member authorities to

ensure that communities are involved in the design and shaping of development at an early stage. **No modifications proposed.**

<u>Linlithgow and Linlithgow Bridge Community Council (930033)</u>

Linlithgow Area of Restraint was raised as an issue in the Main Issues Report for the West Lothian LDP (ASD76). The Council took the view to remove the restraint approach subject to considerations of landscape impact and availability of infrastructure being appropriately addressed in any development strategy / site allocations which came forward. This position is set out in paragraphs 5.63 – 5.67 of the Proposed West Lothian LDP (ASD77). **No modifications proposed.**

Mr Mike Martin (798523)

For the next 12 years the need for strategic growth will be largely met by land already identified in existing and proposed LDPs. Figure 3.1 Key Diagram identifies the broad location of this as Strategic Growth 2018-2030. This does not include Balerno. Beyond 2030 growth will be directed to locations in and around Edinburgh, locations along Long Term Growth Corridors and settlements within Rural Growth Areas. Balerno is not located on a Long Term Growth Corridor or within a Rural Growth Area. **No modifications proposed.**

Muir Smith Evans (202101)

SESplan disagree that Scotland's National Showground at Ingliston should be specifically recognised in paragraph 3.21 and Figure 3.3. Scotland's National Showground is referred to as part of the West Edinburgh Business Cluster in Table 4.1. **No modifications proposed.**

Musselburgh Conservation Society (927996)

The spatial strategy identifies Strategic Growth Areas and Long Term Growth Corridors in West Lothian. Long Term Growth Corridors direct growth to those transport corridors of primary importance for long term strategic growth. For the next 12 years the need for strategic growth will be largely met by land already identified in existing and proposed LDPs. Placemaking principles set out in Table 3.1 of the Proposed Plan include that the re-use or re-development of brownfield land should be considered before new development takes place on greenfield land. The identification of individual sites for development will be a matter for the respective LDPs. **No modifications proposed.**

Network Rail (928260)

The name in the Proposed Plan reflects the location of the station. **No modification proposed.**

New Ingliston Ltd (929755)

SESplan disagree that there is a need to insert the requested paragraph to the plan, the IBG forms part of the West Edinburgh Business Cluster which the plan supports in Section 4. **No modifications proposed.**

Park Lane (Scotland) Ltd (929755)

SESplan disagrees that Figure 3.3 should recognise the M8 Corridor. Figure 3.1 indicates growth corridors which direct growth to those transport corridors of primary importance for long term strategic growth. **No modifications proposed.**

SESplan disagrees that Paragraph 3.3 should include rail improvements at Gogar and extension of tram to Newbridge. These are referred to in paragraph 3.22. **No modifications proposed.**

Scottish Environment Protection Agency (790577)

The SESplan Strategic Flood Risk Assessment, October 2016 sets out information on flood risk (ASD01). An Addendum to the Strategic Flood Risk Assessment has been prepared which identifies potential flooding issues within each of the Key Areas of Change identified in the Proposed Plan (ASD53). A large part of Edinburgh and West has been identified within the Forth Estuary Management Strategy 2015 as a Potentially Vulnerable Area for flood risk. The SESplan Strategic Flood Risk Assessment Addendum sets out the main areas of risk and refers to actions contained in the Local Flood Risk Management Plan for the Forth Estuary, June 2016 (ASD70). The Management Plan presents actions to avoid and reduce the risk of flooding within these Potentially Vulnerable Areas.

If the Reporter is so minded, the wording in paragraph 3.21 could be made clearer to reflect that the area includes significant water bodies and that the SESplan Strategic Flood Risk Assessment identifies areas of flood risk. Further assessment of flooding will be required at the local and more detailed planning stages. **No modification proposed.**

Wallace Land Investment and Management (930071)

SESplan disagrees that a sentence should be added to paragraph 3.19 to include Area 6 (M9 Corridor) and Area 8 (M8 Corridor). Figure 3.1 indicates growth corridors which direct growth to those transport corridors of primary importance for long term strategic growth. **No modification proposed.**

SESplan disagree that paragraph 3.19 should recognise Linlithgow for future growth. While a not insignificant allocation of land for housing has been provided for in the West Lothian LDP this is not regarded as constituting strategic growth and there is consequently no need for any revision to be made to paragraph 3.19, Figures 3.1 and 3.3. Residential development in Linlithgow, and the environmental consequences of this, is to be mitigated by a number of initiatives including the construction of new slip roads onto the M9 and land has been safeguarded in the West Lothian LDP to facilitate this. The upgrading of M9 Junction 3 is not predicated on new housing. As set out in paragraph 5.8, based on current housing land estimates West Lothian Council is not expected to be required to allocate additional housing land in its subsequent LDP to meet the housing land requirement. **No modifications proposed.**

SESplan disagrees that paragraph 3.22 should include reference to the potential to upgrade Curriehill Station. For the next 12 years the need for strategic growth will be largely met by land already identified in existing and proposed LDPs, which do not identify the requirement to upgrade this station. Beyond 2030 growth will be directed to locations in and around Edinburgh, locations along Long Term Growth Corridors and settlements within Rural Growth Areas. **No modifications proposed.**

SESplan disagrees that Paragraph 5.13 should be expanded to provide further guidance of the scale and location of growth within the each of the respective LDP areas. Allocations are to be made in LDPs being prepared after the next SDP, in line with the spatial strategy. The next SDP will identify more specific locations for these to be met in line with the spatial strategy. **No modifications proposed.**

Winchburgh Developments Ltd (832800)

The delivery of the new station is identified as a Strategic Project 2018 - 2030 and a new rail station was a named component of the 2009 West Lothian LDP. This helped to underpin the decision to allocate significant new housing in this location. The new station will connect the strategic growth at Winchburgh to the wider region. **No modifications proposed.**

Requirements for the developer of the new school are set out in the planning consent and supporting Section 75 Agreement. The delivery of the new school is to be at developer expense. **No modifications proposed.**

SESplan notes seven representations of support for this section of the Proposed Plan as well as representations of support for Edinburgh meeting a larger proportion of the region's housing needs along transport corridors, the construction of a new railway station at Winchburgh, extension of the Edinburgh Tram to Newbridge, and the reservation of potential route extensions to Livingston and strategic growth to the east and west of Livingston.

Reporter's conclusions:

[Note: For DPEA use only.]

Reporter's recommendations:

[Note: For DPEA use only.]