

**Your details (mandatory)**

Please indicate in what capacity you are making this submission:

- as an individual (and representing your own views)
- as a representative of a private or commercial organisation (and representing the views of that organisation)
- as a representative of a public organisation (and representing the views of that organisation)
- as an agent (and making comments on behalf of other individuals that you represent or third parties)
- other

Please complete the following contact information:

Name

Email

Telephone

Address

Organisation name

Client's name

**Is this the first time you have made a written representation on the Proposed Plan? (mandatory)**

- Yes
- No

**If you have previously submitted a site to be considered for development when the council was initially seeking Expressions of Interest (EOI), or commented on the Local Development Plan at the Main Issues Report (MIR) stage, or made a previous submission to the Proposed Plan please provide the reference given to you at that time if known.**

EOI & MIR reference number can be found on any email or written communication we may have previously sent you.

Enter EOI (Expression of Interest) reference here

Enter MIRQ (Main Issues Report) reference here

**Once form has been completed please sign and date (mandatory)**

You do not have to respond to all of the questions set out only those which you feel are of particular relevance to you.

Signature  Date

**FOR OFFICE USE ONLY**

Proposed Plan reference

**Please use this form for sections:** Foreword; Background; Context; Role and Purpose of Plan; Vision Statement and Aims; The Spatial Strategy (including Policy Framework); Appendices; Glossary; Proposal Maps; Strategic Environmental Assessment (SEA) Environmental Report; Equalities and Human Rights Impact Assessment (EQHRIA); Strategic Flood Risk Assessment (SFRA); Habitats Regulations Appraisal; Transport Appraisal (TA); and Action Programme.

Section title	<input type="text"/>	
Page nos.	<input type="text"/>	Paragraph nos. <input type="text"/>
<p>Please see attached submission and Development Framework</p>		

Section title	<input type="text"/>	
Page nos.	<input type="text"/>	Paragraph nos. <input type="text"/>
<p>Please see attached submission and Development Framework</p>		

Please use this form for sections: The Spatial Strategy and Development by Settlement

Settlement	Whitburn		
Site address / location	Whitburn South		
Site Ref		Page nos.	
Please see attached submission and Development Framework			

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### Additional comments

Please use this space to add any additional comments which have not been covered elsewhere in this questionnaire.

Please see attached submission and Development Framework

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Proposed West Lothian  
Local Development Plan Representation

**Whitburn South**

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On behalf of

**CALA Management Ltd**

20<sup>th</sup> November 2015

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## **1. Introduction**

- 1.1 The following submission has been prepared on behalf of CALA Management Ltd (CALA) in response to the West Lothian Local Development Plan Proposed Local Development Plan.
- 1.2 CALA is a leading provider of quality homes and places in Scotland and the UK. The company is involved in a number of community master-planning projects, and has been commended by the Scottish Government and Councils for its approach to stakeholder consultation and sustainable development.
- 1.3 This submission supports the allocation of land at Blaeberryhill Farm (Whitburn South) for housing. The site is approximately 82.91 hectares and has capacity for around 1000 new homes
- 1.4 A representation was submitted to the Council's Main Issues Report consultation in October 2014 (MIRQ0148) and to the 'Expression of Interest' exercise undertaken in 2011 (EOI-0123). However, the site has not been identified for development in the Proposed LDP.
- 1.5 In our view, the development of land at Whitburn South is well placed to assist in meeting the significant shortfall in identified housing sites. It would round off the development extent of Whitburn and could be progressed alongside proposals to the west at Heartlands, improving the housing mix in the town and providing wider planning gain and regeneration benefits.
- 1.6 Therefore, we consider that the Proposed Plan should be modified to extend the Whitburn settlement boundary and allocate Whitburn South for housing development, with an indicative capacity for 1000 new homes. This submission should be read in conjunction with our associated representation on Housing Supply and Demand, which demonstrates that the LDP needs to allocate a substantial number of additional housing sites to be consistent with SESplan and Scottish Planning Policy.
- 1.7 The accompanying Development Framework, prepared by OPEN has been produced to illustrate the proposals and the justification that supports this location as a logical expansion area for Whitburn.

## 2. Site Assessment

- 2.1 The site extends to approximately 82.91ha and comprises permanent grassland, including field boundary hedgerows and shelterbelts. It lies to the immediate south of Blaeberryhill Road, which forms the northern boundary along with housing at Glenisla Court. To the south and east lies agricultural land, with the western boundary formed by the A706 road south to Longridge.
- 2.2 A masterplan has been developed for the site which illustrates a possible capacity of 1,000 houses and there would be a primary school within the site. Access to the site would be taken from two points on Blaeberryhill Road. The development would complete the physical extent of Whitburn to the south of the town, and could be progressed alongside the proposals at Heartlands, providing impetus to the regeneration of the town through housing development, with an associated increase in employment, population and local spending.
- 2.3 The strategic location of Whitburn South is a key benefit to the proposed new community. The site is approximately halfway between Glasgow and Edinburgh with good road and public transport links via the M8 to both cities. This central location and good transport links make Whitburn a popular place to live, recognised by the housing allocation at Heartlands. The new proposals can provide an opportunity for the further sustainable growth of the town.
- 2.4 There are committed infrastructure proposals in the local area, including the recent M8 junction at West Whitburn, which is now operational and the associated Park and Ride at the Cowhill Business Park. The site is well connected to Whitburn Town Centre by a network of footpaths and routes that run through the existing built up area.
- 2.5 We can confirm that the site meets the criteria contained within PAN 2/2010 for determining the 'effectiveness' of a site, as follows:

Ownership: The majority of the site is within the control of CALA and with willing sellers, with the remainder owned by West Lothian Council.

Physical: There are no physical constraints to the development of the site for housing.

Contamination: On the basis of desk based research, it is considered unlikely that the site constitutes contaminated land.

Deficit Funding: No public funding is required to develop housing on the site.

Marketability: Whitburn's highly accessible location dictates that it is a sought after location for house-buyers.

Infrastructure: The required infrastructure for housing development is available or can be made available by the developer.

Land Use: Housing is the sole preferred use in the context of this proposal.
- 2.6 SESplan Policy 7 (Maintaining a Five Year Housing Land Supply) indicates that sites for greenfield housing development proposals either within or outwith the identified SDAs may be allocated in

Local Development Plans to maintain a five years' effective housing land supply subject to satisfying the following criteria:

- a) The development will be in keeping with the character of the settlement and local area;
- b) The development will not undermine Green Belt objectives;
- c) Any additional infrastructure required as a result of the development is either committed or to be funded by the developer.

2.7 In our view, the allocation of Whitburn South for housing development conforms to the requirements of SESplan Policy 7, as described below;

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

2.8 The proposed development provides a logical extension to Whitburn and would reflect the housing to the north of Blaeberryhill Road. It will be designed to demonstrate clear integration and linkages with the existing settlement and to reflect the emerging character of Whitburn and Heartlands.

2.9 The landscape setting of Whitburn has been a key consideration in establishing the extent and form of development at Whitburn South. Whitburn generally lies on a shallow north facing slope with the M8 passing along a natural valley, with the Bathgate Hills rising to the north. The landscape to the south of Whitburn is of a rolling character, defined by a series of low ridges. Some of the ridges act to enclose the town which lies on the north facing slopes. Further, despite being a generally open landscape, the visual horizon is dominated by modern architectural or infrastructural features, where Bathgate and Livingston are clearly visible to the east.

2.10 The character of Whitburn is changing. As the development at Heartlands progresses, the town is becoming more diverse with different styles of architecture and building materials reflecting its growth over time. Whitburn South can complement Heartlands by rounding off the development extent of Whitburn, ensuring the edges of the town are all within 2,000m of the existing town centre. Development at Whitburn South could be progressed alongside proposals at Heartlands, improving the housing mix in the town and providing wider planning gain and regeneration benefits. Development in this location is easily accessible to the town centre on foot and both the recently developed M8 junction and also the existing M8 junction 4.

*The development will not undermine Green Belt Objective*

2.11 The site is not located within the Green Belt, rather it is a greenfield site. Furthermore, there are no environmental constraints to development taking place.

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

2.12 We are not aware of any infrastructure constraints that cannot be provided in accordance with this policy requirement. Furthermore, there are committed infrastructure proposals in the local

area, including the recent M8 junction at West Whitburn and the associated Park and Ride at the Cowhill Business Park.

2.13 In short, therefore, we consider that the allocation of the site for housing complies with SESplan Policy 7 which is the key determining policy.

***Summary***

2.14 The site's development would represent a sustainable expansion to the settlement of Whitburn and be of a scale and form in keeping with the character of the settlement and local area. It is envisaged that it would be developed in tandem with development at Heartlands, however, it is important to note that it could progress in isolation of the identified development to provide an alternative development opportunity to the south of the town.

2.15 It is considered that the site at Whitburn South is ideally placed to contribute to the regeneration of the town. Furthermore, it would play an important role in helping to address the significant shortfall in effective housing land supply, which has emerged upon analysis of the Proposed Plan.

### **3. Conclusion**

- 3.1 For the reasons presented, both within this submission, the accompanying Development Framework and the associated representation on Housing Supply and Demand, CALA considers there to be a clear and justifiable case for an additional housing development allocation at Whitburn South.
  
- 3.2 Given the need for the emerging LDP to allocate a substantial number of additional effective sites to meet housing land requirements and ensure the maintenance of a five years' effective land supply, Whitburn's acknowledged attractiveness as a location for development dictates that it is appropriate to review the village's existing settlement boundary and consider any additional opportunities for housing development.
  
- 5.3 The site is capable of making an important contribution towards addressing the major shortfall in the Proposed Plan's housing land supply. It is our conclusion therefore, that the Proposed Plan should be modified to extend the Whitburn settlement boundary and allocate Whitburn South for housing development, with an indicative capacity for 1000 new homes and a primary school.