

Peter P C Allan Ltd



Email: 

Development Planning and Environment Manager,
West Lothian Civic Centre,
Howden South Road,
Livingston,
West Lothian,
EH54 6FF

19th November 2015

Dear Sir,

West Lothian draft Local Development Plan

I have been asked by my clients, Aithrie Estates and Hopetoun Estate Trust, to lodge representations on the proposed draft Plan.

These have been submitted today via the council's on-line portal; but in view of difficulties experienced with that service and the fact that documents cannot be lodged that way, the attached CD has been prepared. It contains both the documents numbers 1 - 13 referred to in the submission and a Word version duplicate of the representations (laid out as far as was possible in the same way as the on-line version).

Yours sincerely,

Peter Allan

Peter P C Allan Ltd
Directors: 





1. GENERAL INFORMATION

Your Details

Please indicate in what capacity you are making this submission: *
Please note that this is a mandatory field.

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: *

Please note that this is a mandatory field.

Title Mr

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

Please note that this is a mandatory field.

First Name Peter

Surname Allan

Email Address

Telephone

Postal Address

Organization Name -

Client's Name

* 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 MIRQ0249

Please enter your survey reference number in the text box below. *

Survey Reference Number (CODE) can be found in the top right corner of this screen.

Survey Reference Number (CODE) will allow you to save your responses and return to finish the survey later.

Please keep a note of your Survey Reference Number (CODE) for future reference.

Please note that this is a mandatory field.

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2. FOREWORD (page 4)

This introduction by the Leader of the Council establishes the role of the LDP and how it will help deliver the council's core objectives.

Do you wish to make a comment?

Please use the text box below for comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

3. BACKGROUND (page 6, paragraphs 1.1-1.5)

Provides a brief historical context to the economic development of West Lothian which helps explain how settlements established and have developed.

Do you wish to make a comment?

yes

* no

Please use the text box below for comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

4. CONTEXT (page 7, paragraphs 2.1-2.2)

Provides wider context for the LDP in geographic terms and explains how the LDP fits with the Strategic Development Plan (SDP1).

Do you wish to make a comment?

Yes *

No

Please use the text box below for comments.

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Paragraph 2.2

Objections:

- Failure to address the continuous five year effective land requirement
- Failure to adopt the timescales set out in SPP and to provide the estimated date of adoption of the LDP
- Incorrect to refer to SDP2 MIR spatial strategy and to conflate this with the strategy in the approved SDP1

Argument:

- a) The proposed time periods do not correspond to the advice in SPP as follows (para. 119):

“Local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. In allocating sites, planning authorities should be confident that land can be brought forward for development within the plan period and that the range of sites allocated will enable the housing supply target to be met.”

- b) It is incorrect in to refer to SDP2 MIR as a source of guidance for the preferred strategy. The Proposed Plan must conform to the approved strategic plan SDP1.

5. ROLE AND PURPOSE OF PLAN (page 7, paragraphs 3.1-3.5)

Establishes the role and purpose of the LDP in terms of its being a material consideration in the determination of any planning applications for development in West Lothian and, when adopted by the Council, will replace the West Lothian Local Plan. It also sets out what documents the plan must comply with i.e. the Planning etc (Scotland) Act 2006 and what documents will accompany the plan i.e. the Action Programme etc.

Do you wish to make a comment?

Yes *

No

Please use the text box below for comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Objection:

- Inclusion of a misleading non-statutory housing land supply target apparently as a substitute for the five year effective housing land supply calculation

Argument:

Para 3.1 suggests that the draft Plan has been informed by the representations received to the MIR; but one of the key examples raised by this objector was the failure to achieve a minimum 5 year effective land supply at that stage. The council argued at the recent Linlithgow appeals that it had achieved this key planning objective, but this was rejected by Scottish Ministers in their decisions. This new draft plan fails to address the representations made at the MIR stage and manifestly fails to demonstrate now that it has or will achieve a continuous 5 year effective land supply at all times. It puts forward a non-conforming housing land supply target in Figure 5 on page 22, but nowhere does it provide the effective supply computation that is required by SPP and SDP. The plan should be fundamentally changed to ensure that there are clear policies and proposals, including new sites, designed to eliminate the effective housing land shortfall and provide a basis for ensuring that shortfalls do not re-emerge. Paragraph 3.12 of the strategic Supplementary Guidance states:

“Maintaining a supply of effective land for at least 5 years at all times, in accord with

approved SDP Policy 6 and Policy 7, should ensure that there is a continuing generous supply of land for house building. Member authorities will base their calculation of the five year land supply on the period 2009 – 2024, taking into consideration housing completions” .

6. VISION STATEMENT AND AIMS (page 8, paragraphs 4.1-4.3)

Establishes the vision for the LDP in terms of outcomes desired over the plan period and identifies the key aims of the plan by individual subject areas i.e. Economic Development & Growth, Community Regeneration, Sustainable Housing Locations, Infrastructure Requirements and Delivery, Town Centres and Retailing, the Natural and Historic Environment, Climate Change and Renewable Energy and Waste and Minerals.

Do you wish to make a comment?

Yes

No

If you wish to make comments please begin by selecting the relevant sub-section(s) of Vision Statement and Aims from the list below.

Please use the text box below for comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Economic Development and Growth (page 8) *

Community Regeneration (page 8)

Sustainable Housing Locations (page 9)

Infrastructure Requirements and Delivery (page 9)

Town Centres and Retailing (page 9)

The Natural and Historic Environment (page 9)

Climate Change and Renewable Energy (page 9)

Waste and Minerals (page 9)

Economic Development and growth (page 8)

Objection:

- Failure to make specific reference to the qualitative aspects of housing demand, including location, and to recent government announcements regarding boosting new housing opportunities

Argument:

There is no mention of housing and the role it plays in facilitating economic development and growth. In particular, the draft Plan should refer to the evidence in the recent publication “Understanding the housing aspirations of the people of Scotland”, September 2015 Scottish Government Social Research (Doc 1), that meeting housing aspirations is a clear planning objective and fundamental to ensuring that West Lothian is a place which will attract people who wish a home but may not be able to find one of their choice, for example, in Edinburgh. Similarly, the letter from the Chief Planner of 07.10.15 (Doc 2) explains how the government is proposing to boost the private rented sector as one of its priorities for expanding housing supply and the press release of 05.11.15 (Doc 3) explains that further funding for homebuyers has been achieved. Doc 8 is a letter from John Brown, a well-known authority on the subject, underlining the qualitative case when considering housing locations. Doc. 12 is an article prepared by Homes for Scotland calling for a significant increase in housing. Given the correct emphasis on population and economic growth, it is surprising that the draft Plan fails to recognise these important points.

The council has an important role to play in facilitating the provision of infrastructure, for example as the supplier of education. This should be acknowledged.

Infrastructure Requirements and Delivery (page 9)

Objection:

- Failure to clarify those items of infrastructure which should be determined in the proposed Plan rather than in supplementary guidance.
- Failure to clarify in the second sentence under ‘Infrastructure Requirements and Delivery’ that the council has a role to play in meeting the gap between proportionate developer contributions and the council’s statutory duties

Argument:

- a) It is correct that developer contributions should be proportional. Unfortunately, in West Lothian, developers are expected to pay the full cost of infrastructure, a proposition never expressly stated in policy but achieved in practice through supplementary guidance and s.75 agreements. The plan should be changed here and in later sections to ensure that policy and practice coincide and that SG remains subordinate to the Plan and its policies. Reference is made to paragraph 139 of Circular 6/2013 and the table section 'matters that should not be included in supplementary guidance but be within the plan, include:
Items for which financial or other contributions, including affordable housing, will be sought and the circumstances (locations, types of development) where they will be sought".
- b) Reference is made to Appendix 4 'Supplementary Guidance', Affordable Housing and the express statement which includes reference to financial contributions.

7. THE SPATIAL STRATEGY (INCLUDING POLICY FRAMEWORK) (page 10, paragraphs 5.1-5.10)

In the context of the Strategic Development Plan (SDP), the LDP identifies West Lothian as being one of thirteen Strategic Development Areas where development will be focused in sustainable locations where infrastructure is either available or can be provided and in locations where there are no environmental constraints.

Do you wish to make a comment?

* yes

no

Please use the text box below for your comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Economic Development and Growth (page 12, paragraphs 5.11-5.22)

Flexibility within traditional industrial estates (page 14, paragraphs 5.24-5.25)

Enterprise Areas (page 17, paragraphs 5.24-5.25)

Local business opportunities, small business start-ups and working from home (page 17, paragraph 5.26)

Tourism (page 17, paragraphs 5.27-5.28)

Promoting community regeneration (page 19, paragraphs 5.29-5.35)

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Housing land requirements for the LDP (page 20, paragraphs 5.36-5.49)

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Effective Housing Land and Generous Supply (page 23, paragraphs 5.50-5.53)

*

New Housing Sites and Design (page 24, paragraphs 5.4-5.56)

Strategic Allocations (including previously identified Core Development Area Allocations) (page 25, paragraphs 5.57-5.61)

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Whitburn/Charette (page 26, paragraph 5.62)

Linlithgow and Linlithgow Bridge (page 26-27)

Deans South, Livingston; Area for Comprehensive Re-development (page 27, paragraph 5.68)

Affordable Housing (page 27, paragraphs 5.69-5.74) *

Accommodation for Gypsies, Travellers and Travelling Show People (page 29, paragraph 5.75)

Residential Care and Supported Accommodation (page 29, paragraphs 5.76-5.77)

Infrastructure Requirements and Delivery (page 30, paragraphs 5.78-5.84)

Providing for Community Needs (page 32, paragraphs 5.85-5.88)

Education (page 32, paragraphs 5.89-5.92) *

Healthcare Provision (page 33, paragraphs 5.93-5.96)

Sports Facilities (page 33, paragraphs 5.97-5.101)

Green Infrastructure and Green Networks (page 34, paragraphs 5.102-5.105)

Water and Drainage (page 34, paragraphs 5.106-5.107)

Travel in and around West Lothian (page 34, paragraphs 5.108-5.112)

Roads (page 35, paragraph 5.113)

A71 Corridor (page 35, paragraphs 5.114-5.115)

A801 Corridor (page 35, paragraphs 5.116-5.117)

A89/A8 (page 35, paragraphs 5.118-5.126)

Rail (page 37, paragraphs 5.127-5.130)

Walking and Cycling (page 37, paragraphs 5.131-5.132)

Town Centres and Retailing (page 39, paragraphs 5.133-5.138)

Landscape Character and Local Landscape Designations (page 41, paragraphs 5.139-5.143)

Countryside Belts (page 42, paragraph 5.144) *

Development in the Countryside (page 42, paragraphs 5.145-5.147)

Lowland Crofting (page 44, paragraphs 5.148-5.152)

Green Networks, Local Biodiversity Sites and Geodiversity Sites (page 45, paragraphs 5.153-5.155)

Forestry (page 46, paragraphs 5.156-5.163)

Union Canal (p.49 paragraphs 5.164-5.165)

Pentland Hills Regional Park (page 49, paragraphs 5.164-5.165)

Country Parks (page 50, paragraph 5.169)

Allotments/Community Growing (page 51, paragraphs 5.170-5.171) *

Temporary/Advance Greening (page 51, paragraphs 5.172-5.174)

Biodiversity (page 52, paragraphs 5.175-5.180)

Geodiversity (page 53, paragraph 5.181)

West Lothian Open Space Strategy (page 53, paragraphs 5.182-5.184)

Historic and Cultural Environment (page 54, paragraphs 5.185-5.187)

Conservation Areas (page 55, paragraphs 5.185-5.188)

Former Bangour Village Hospital, Dechmont (page 56, paragraph 5.189)

Conservation Area at Abercorn/Hopetoun Estate (page 56, paragraph 5.190)

Other Areas of Built Heritage and Townscape Value (page 57, paragraphs 5.191-5.199)

Listed Buildings (page 58, paragraphs 5.185-5.187)

Historic Gardens and Designed Landscapes (page 59, paragraphs 5.200-5.201) *

Historic Battlefields (page 60, paragraph 5.202)

Archaeology (page 60, paragraph 5.203)

Scheduled Monuments (page 60, paragraphs 5.204-5.206)

Public Art (page 61, paragraphs 5.207-5.208)

Climate Change Measures (page 62, paragraphs 5.209-5.214)

Low Carbon Development and Renewable Energy (page 63, paragraphs 5.215-5.221)

Wind Farms and Wind Turbines (page 65, paragraphs 5.222-5.225)

Energy and Heat Networks (page 66, paragraphs 5.226-5.229)

Off-gas Grid Areas and Renewable Heat Requirement for New-build Housing (page 67, paragraphs 5.230-5.232)

The Water Environment and Flood Risk Management (page 67, paragraphs 5.233-5.239)

Air Quality and Noise (page 70, paragraphs 5.240-5.242)

Edinburgh Airport (page 71, paragraph 5.243)

Noise (page 71, paragraph 5.244)

Contaminated Land (page 71, paragraphs 5.245-5.246)

Vacant and Derelict Land (page 72, paragraphs 5.249-5.250)

Minerals and Waste (page 73, paragraphs 5.251-5.256)

Site Restoration (page 75, paragraphs 5.257-5.238)

Unconventional Gas Extraction including Hydraulic Fracking (page 75, paragraph 5.259)

Waste (page 76, paragraph 5.260)

Promoting community regeneration (Page 19, paras 5.29 – 5.35)

Objection:

- Clarify that the imbalance referred to and the resultant requirement for market housing should mean that market housing in such locations is free from any requirement to provide affordable housing either on or off site or make any payments in lieu

Argument:

- a) Para. 5.34. Broxburn also displays some characteristics arising from deprivation. Broxburn Academy was the subject of an HIE inspection in 2011 with annual visits thereafter to check on progress. The school has now been released from this process; but the proposals in this paragraph suggest that more private housing in Broxburn and the CDA would be beneficial and taking account of the aspirations of local families
- b) In the circumstances described in the paragraph, market housing should be free of any requirements to provide or fund further affordable housing.

Housing land requirements for the LDP (page 20, paras 5.36 – 5.49)

Objections:

- Housing need and demand should be separately identified in meeting the 5 year effective housing land requirement as required by both national and strategic policy
- Remove all reference to HoNAD2 as a basis for calculating a housing land requirement for this draft LDP
- Add references to evidence of greater demand for housing of various tenures and to Scottish Government's support for the supply of housing to be increased
- Insert clarification in paragraph 5.46 that the approach to be adopted will be based on evidence of a shortfall in meeting the 5 year effective housing land supply and other factors such as support for infrastructure and for the identification of affordable and other forms of housing land requirements
- Delete Fig 5 on page 22. Housing land supply targets are not a function of LDPs within City Regions. Produce the required information instead in accordance with SPP and the SDP
- Remove the words 'endeavour to' in the first line of Policy HOU2 as they are inconsistent with the requirement to maintain a 5 year supply of effective housing land at all times

Argument:

Generally, this section fails to comply with national policy in the following ways:

- a) No evidence that HoNAD1 findings have been utilised in identifying effective housing land for all tenures, contrary to the fourth bullet point in paragraph 5.37

- b) No evidence that need and demand have been separately identified in Figures 3, 4 and 5
- c) Paragraphs 5.38 and 5.39 advance the case for adopting the later HoNAD2 in calculating the requirement. However, until SDP2 is approved such a case cannot be accepted as the outcome of the process is unknown, including the requirement. These paragraphs proceed on the assumption that the balance between need (affordable) and demand (market) housing will significantly change. That cannot be a relevant consideration for the draft LDP since it is required to conform to SDP and therefore HoNAD1. There is clear evidence from the housebuilders which refutes such claims and rising house and rental prices too point in a different direction. Furthermore, the Scottish Government's report Doc 1, introduces an important element into the process of determining the correct balance to be made when considering how much demand housing should be planned for. The implication to be drawn is that there is hidden demand for housing of the kind that people want. Similarly, the letter from the Chief Planner of 05.11.15 (Doc 3) indicates that government intends to prioritise its efforts to increase the private housing land supply, no doubt on evidence of need.
- d) Paragraph 5.41 of the LDP declares that the Plan should also take account of material circumstances which update elements of the SDP strategy. This is not always correct. For example, it would not be lawful for this LDP to use the later housing need and demand figures as an input into calculating the 5 year housing land requirement. That is a function that can only be performed by the strategic authority and only given effect to following the approval of Scottish Ministers.
- e) Paragraph 5.46 is welcome and in particular the final sentence which states: "Within the areas embraced by the original CDA allocations, the LDP will adopt a flexible approach to residential development and where it is appropriate to do so will allow additional development which may exceed the original capacities set in the ELSP". It is however understood that WLC interpret this paragraph as referring to post-2024 requirements based upon the flawed Figure 5 that there is no need to identify further effective housing land prior to this date.
- f) The draft Plan, Figure 5, housing target proposals, are not a function of LDPs that lie within City Regions for the simple reason that this is a strategic requirement (SPP paragraphs 118, 119 and 120). Figure 5 should therefore be disregarded and removed from the draft Plan. In any event, targets are just that and are no substitute for the first essential step which is to ensure there is an effective 5 year supply of housing land at all times for both need and demand. The council is in serious breach of this national requirement. The evidence is overwhelming that there is a significant shortfall – see Aithrie Estates and Regenco Trading joint input into the MIR Doc.4, to the outcome of the recent appeals in Linlithgow where Scottish Ministers agreed with the Reporter that there was a shortfall in meeting the effective 5 year housing land policy requirement amongst other things and to the attached re-calculation of the effective 5 year housing land supply Doc.5. The arguments now advanced in this draft LDP conflate gross and net housing land supply.
- g) Calculations in Figure 5 of effective supply are disputed in relation to constrained sites, windfall and the lack of evidence that new LDP allocations will perform as proposed.
- h) The recognition that the CDA land forms a key component of the strategy is welcome. However, the list of sites in Appendix 2 referred to in Policy HOU1, which is headed 'maintaining an effective housing land supply', includes locations and sites where there appears to be little hope of early development, for example East Broxburn where the principal sites are noted in Appendix 2 under 'status' as 'carried forward from WLLP' ie., they do not have consent and no significant action has been taken to promote them for many years. None of these CDA sites is shown on the current audit as producing houses before 2016/17 and even then in penny numbers (this part of the CDA is supposed to provide 2,000 homes). Given the sites' status

and their complex interrelationship arising from local plan requirements for shared new roads, schools, bing restoration, access to Winchburgh, including contributions to costs there, etc., that sort of programming must be highly optimistic.

- i) Remove the words 'endeavour to' in the first line of Policy HOU2 as they are inconsistent with the requirement to maintain a 5 year supply of effective housing land at all times.
- j) The draft Plan should refer to the opportunities that the City Deal might offer to West Lothian in order to assist in meeting key infrastructure for CDAs. In particular, the proposed motorway junction on the M9 at Duntarvie in Winchburgh is an item of infrastructure which has wide benefit to the CDA as a whole and beyond. Not only will it lead to improved travel opportunities, including by sustainable transport modes arising from the park and ride opportunity and access to the rail station, but will release investment for other key infrastructure, particularly the new secondary schools without which development in the entire county will be prejudiced.

It is suggested that the council should vigorously support such opportunities.

Effective Housing Land and Generous Supply (page 23, paragraphs 5.50-5.53)

Objections:

- There is insufficient input in the Plan to justify the conclusion in Fig 5 that the land supply is adequate. There is no information supplied in order to judge whether there is sufficient land allocated to meet both need and demand and no information on the separate requirements for each
- On the basis of paragraph 5.48 and other evidence of growing need and demand, set the generosity figure at 20% additional to the requirement

Argument:

- a) No separate audit figures of need to include programming of sites is included and no consequential adjustments to the current Land Audit 14 to show need housing, is provided, notwithstanding the advice in PAN 2/2010 (the evidence that the Audit is almost exclusively for demand housing, at least for Winchburgh, can be found in the Audit 14 where the total number of houses is almost exactly in line with expectations at 3,450. While there is a separate column for affordable housing, it is not programmed and is not deducted from the 3,450). Appendix 2 to the Plan, which lists the sites included in the draft, includes two new local development plan sites within Winchburgh amounting to 500 gross, neither of which attempts to consider separately what proportion represents need housing.
- b) Despite the heading of this section including the word 'generous', no information is provided here as to what that means in practical terms. If as claimed in paragraph 5.48, housebuilders will produce more completions than predicted in Audit 14, then the proper response is that the generosity allowance should be increased above 10%. It is incorrect to refer to the 2019-2024 figures as 'effective supply'.
- c) The matter of a generous supply of housing land is included in Figure 5 but without explanation of the 10% figure. The subsequent section of the draft on page 23 states it includes this issue but it does not. The evidence is that a) demand for housing is very much on the increase; b) the evidence is that many households aspire to own or rent their own home; and c) the council itself in paragraph 5.48 offers the evidence

that the industry will increase output on existing sites. Setting the generous supply at the minimum recommended by government in SPP para 116 is not a satisfactory response to these indicators and the council's own predictions. In view of the evidence the figure should be raised to 20% in Fig.5 (although Fig.5 as proposed should be deleted and replaced with a calculation of the five year effective housing land supply. A suggested calculation is contained in Doc 5).

- d) Paragraph 5.52 correctly states that inclusion in the Audit as an effective site does not guarantee the delivery of homes. What the paragraph fails to do is to include the word 'continuous' as in national policy. Each year the Audit must be reviewed and if there is a shortfall in effective housing supply for the 5 year period, action must be taken to identify further effective housing sites (although of course the need for such action should be anticipated in advance). Adding in estimates of future windfall development as proposed in Fig 5 is to duplicate the contribution from that source in the calculation since it is already contained in the Audit.
- e) Policy HOU2 fails to comply with requirements for an effective land supply at all times in that it uses the word 'endeavour' in the policy wording.
- f) The MIR submissions by Regenco, Aithrie Estates and the Hopetoun Estate Trust Doc 4 calculated the scale of the deficit in meeting the housing land requirement. The recent Burghmuir appeal decision showed that the deficit had not been tackled. The current local plan took many years to prepare and to be adopted and is now long overdue for replacement. This proposed plan is already very late according to the processes contained in Circular 6/2013. The proposed plan does not display any sense of urgency in setting things to rights and has not and does not propose a sufficiently augmented land supply to lead to the deficit being removed.
- g) Contrary to the wording of the policy, no annual audit prepared on a 'sectoral basis' has been provided or analysed in relation to its findings for both need and demand. This is despite the fact that paragraph 115 of SPP "requires that plans should address the supply of land for all housing. They should set out the housing supply target (separated into affordable and market sector) for each functional housing market area, based on evidence from the HoNDA1".
- h) The HoNAD1 report is however to be considered alongside other evidence. The same SPP states in relation to the target that it "should be reasonable, should properly reflect the HoNDA estimate of housing demand in the market sector, and should be supported by compelling evidence". The recent report commissioned by government in Scotland (Doc.1) makes it clear that 'number crunching' alone is not sufficient when considering what people want. The economic statistics may point in one direction, but aspiration in another. The recent announcement in both Scotland and England regarding supporting those with insufficient funds to get onto the housing ownership ladder could make a considerable difference to the relative proportions of the need and demand equation and the assumptions made in the HoNAD analysis. The announcement in England referred to a figure of 200,000 new homes for sale at subsidised prices. In Scotland a similar initiatives have been proposed including for private rented homes.

Strategic Allocations (including previously identified Core Development Area Allocations) (page 25, paragraphs 5.57-5.61)

Objection:

- Not all of the strategic allocations can be assumed to be effective or capable of becoming effective

- The sites in paragraph 5.61 should be identified in Appendix 2 and representations allowed as to their location and suitability to perform the envisaged task.
- Reference to withdrawal of support for CDA housing land which has consent and is subject to s.75 agreements should be deleted

Argument:

- a) The reference to the strategic HoNAD2 in para. 5.58 is not understood as this is not part of the strategic development plan to which this LDP must conform. West Lothian Council has no strategic planning function. References to HoNAD 2 as the basis for calculating a requirement for need and demand housing should therefore be deleted.
- b) Particular mention is made in para. 5.59 of the part of the CDA allocation known as East Broxburn and joint working with Winchburgh being important. There is serious doubt that East Broxburn owners taken as a whole will both work together and jointly work with the Winchburgh developer as assumed in current policy. While some land at East Broxburn could be developed separately, possibly associated with Winchburgh, looked at as a whole the allocation is constrained by the most serious difficulties which are recorded in the audit. There is serious doubt that even the modest completions predicted in Land Audit 14 will occur. The advice from government is that such sites should be considered for removal from the Audit (see PAN 2/2010, paragraph 59). They should be replaced with land which is effective or likely to become effective within the period of the Plan. Unless this is done, the assumption of shared costs with the Winchburgh project will be rendered worthless unless a replacement for the lost funds is found. This problem is a contributory factor which should lead to support for the further land allocations in or adjacent to Winchburgh advanced in these representations (see also submitted copy of representations on behalf of Regenco, Aithrie Estates and the Hopetoun Estate Trust which raised this issue as part of their joint MIR submissions, Doc.4).
- c) It is not understood why support for these allocations is subject to infrastructure provision (para. 5.60 and policy CDA1) when that provision largely lies in the hands of WLC, for example as education authority. The land at Winchburgh within the Winchburgh/East Broxburn/Uphall CDA already has planning permission. Financial contributions towards infrastructure requirements are part of the accompanying planning conditions and s.75 agreement. The council has already supported the developments. There can be no qualification of this position in the proposed Plan.
- d) Paragraph 5.61 is not understood. Is the allocation of a number of smaller new sites to complement the spatial strategy specifically for the purpose of mitigating infrastructure costs? If so, this would be a welcome addition to the land supply. These sites and the specific infrastructure referred to should be identified. It is suggested that the proposed new allocations at Winchburgh made in these representations, outwith the present consented area, should be so identified as complementing this purpose. It follows that such sites should be relieved of most developer contributions that the council would otherwise seek to impose.

Affordable Housing (page 27, paragraphs 5.69-5.74)

Objection:

- Given the erroneous wording in paragraph 5.74 that there is Supplementary Guidance available, together with the confusion over what rates and

qualifications will apply, it is essential that the public is informed as to the precise proposals that the council has in mind. Reference is made to paragraph 139 of Circular 6/2013 and the table section 'matters that should not be included in supplementary guidance but be within the plan'. For this reason, the basis of the policy including financial aspects should be included in the final Plan when appropriate representations can be made.

- a) Paragraphs 5.70 and 5.74 refer to the HoNAD2 as the basis for assessment. This is not part of the strategic plan with which the LDP must conform and is therefore incorrect. It appears that the council's proposals will therefore be based on erroneous information.
- b) Paragraph 5.73 refers to the SDP affordable housing policy that there is to be a benchmark figure of 25% affordable housing per market housing site. The draft LDP as presented to committee stated that in priority 1 areas, the requirement is for 25% of the total number of housing units to be all affordable housing in the social rented sector. Winchburgh is such an area. In the previously identified CDAs the requirement was maintained at 25% but 15% was to be for social rent and the 10% balance by any other form. It should be noted that the final sentence of this paragraph contained in the Committee papers version (former paragraph 5.74) has been changed and now omits the qualification for CDA sites. Assuming this is a deliberate omission it represents a potentially serious and fundamental change from the current arrangements and begs the question of how it could be implemented and afforded.
- c) There is no updated SG on the council's website which languishes at the 2003 version updated in 2006, notwithstanding statements to the contrary in the proposed Plan and to the MIR response to representations on behalf of Regenco and Aithrie Estates, page 236, penultimate response (see committee papers Appendix 2). Given the importance of this matter it is essential that these and related issues are brought into the Plan proper and be subjected to appropriate scrutiny as a consequence. There will be scope for a complementary SG no doubt; but given the importance of this subject, it is essential that it is provided during this consultation phase.
- d) It is already a requirement that demand and need housing should be separately identified in the land audit, but this task remains to be carried out as noted in paragraph 5.53, final sentence. The capacity of sites in the current Land Audit 14 is not separated into allocations for both need and demand. The requirement for each derived from the strategic plan has not been identified, contrary to SPP. It follows that implementation of Policy HOU 5 will require revised audits of which the demand audit will show both new sites, and undeveloped sites without consent, reduced by 25% of their capacity. The new figures will then require to be tested against the LDP's ability to demonstrate that the requirement derived from SDP has been met and if not, say for market housing, that appropriate new allocations are added to replace the 25% loss. It follows that any such replacement sites cannot be subject to the affordable housing policy as proposed.
- e) There are currently attempts to require land for affordable housing to be exempt from off-site infrastructure costs. It is noted that there is no policy proposal that areas deducted from market housing sites to satisfy the policy should have their off-site infrastructure needs met by the donor site. This is a key issue for developers as, should such a policy emerge, it would fundamentally alter the scale of developer 'contributions' to the point that the donor site could become no longer viable. As explained, such a fiscal policy cannot be confined to the SG but must appear in the Plan.

Education (page 32, paragraphs 5.89-5.92)

- a) Education as described in paragraph 5.91 requires clarification. The principal school issue affecting the whole of West Lothian is the proposed new denominational secondary school to be sited at Winchburgh. But it should be clarified that this is to be provided by the council, not as stated, by the developers, as it is the council which is receiving and managing developer contributions from the entire council area as development takes place.
- b) This would also be the preferred policy for the ND secondary school at Winchburgh too without which no development in Winchburgh or Linlithgow can proceed further. The geographical area for contribution collection requires to be defined.

Countryside Belts (page 42, paragraph 5.144)

Objection:

Representations on this subject were made to the LDP MIR with particular reference to four potential development sites and an objection to the inclusion of the northern extremity of East Broxburn site H-BU10 which intrudes into the Countryside Belt (See Doc.6, the 'Open' report prepared as part of the Regenco/Aithrie MIR submissions). These MIR representations are maintained and should be considered alongside proposed housing allocations made in this representation.

8. DEVELOPMENT PROPOSAL BY SETTLEMENT (page 79)

Provides details of development proposals which are supported by the LDP in each town and village across West Lothian and assigns each one a unique reference for ease of identification.

Do you wish to make a comment?

* yes

no

If you wish to make comments please begin by selecting the relevant Settlement(s) from the list below.

Addiewell & Loganlea (page 79)

Armadale (page 80)

Bathgate (page 81)

Blackburn (page 82)

Blackridge (page 83)

Breich (page 83)

Bridgehouse & Bridgecastle (page 83)

Bridgend (page 83)

* Broxburn (page 84)

Burnside (page 84)

Dechmont & Bangour (page 85)

East Calder (page 85)

East Whitburn (page 86)

Ecclesmachan (page 86)

Fauldhouse (page 86)

Greenrigg (page 86)

Kirknewton (page 87)

Landward area (page 87)

Linlithgow & Linlithgow Bridge (page 89)

Livingston (page 90)

Longridge (page 93)

Mid Calder (page 93)

Newton and Woodend (page 93)

Philpstoun/East & West Philpstoun/Old Philpstoun (page 93)

Polbeth (page 93)

Pumpherston (page 93)

Seafield (page 93)

Stoneyburn/Bents (page 94)

Threemiletown (page 94)

Torphichen (page 94)

Uphall (page 94)

Uphall Station (page 94)

West Calder & Harburn (page 95)

Westfield (page 95)

Whitburn (page 96)

Wilkieston (page 97)

* Winchburgh (page 97)

Development Proposals by Settlement

East Broxburn

Objection:

- It is clear that the phrase 'development proposals by settlement' Chapter 2 heading is a misnomer in that the sites are listed as notional capacities. They are not lists of a likely product in the relevant periods. In order to be a useful tool, they might include the information upon which Fig 5 was created, particularly for the 2019-2024 period which is not included in Land Audit 14 beyond 2020/21. Those making representations would then be able to comment upon the assumptions being made.
- It is proposed that the constrained sites within Appendix 2, Audit 14 references 4/37, 39, 48, 22 and 49, should not be included in the calculation of the land supply for the proposed Plan.

Argument:

- a) It is considered that a number of sites in East Broxburn are unlikely to be capable of development within 5 years or to be developed within the Plan period as discussed in the representations above on housing land requirements, effective housing land, a generous supply and strategic allocations. Paragraph 123 of Scottish Planning Policy (June 2014) states –

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

- b) Reference is made to the attached LDP MIR representations on behalf of Regenco and Aithrie Estates in 2014 and in particular paragraphs 117 – 123 which deal with the issue of the land supply in East Broxburn (Doc.4):
- c) These paragraphs accurately reflect the position today. Regrettably, the council appear to have ignored this MIR submission.

Winchburgh

Objection:

- Compare the Winchburgh/East Broxburn/Uphall CDA figures in Appendix 2 with the agreed Housing Land Audit 14. Adjust the capacity of new sites H-WB 16 and H-WB 17 to 185 and 200 respectively to account for their net developable capacity.
- Reduce the total number of units shown in Appendix 2 for Winchburgh from 4,243 to 3,903 (se Aithrie/HET Doc.4 and calculation on Doc.7)
- Add in new sites with MIR references EO1-0202, EO1- 0203, EO1-024 and EO1-0193 required to augment the land supply in Winchburgh to make up the difference and as a contribution to finding further effective land in the Plan area

Argument:

1. Target for Winchburgh draft LDP page 255

- a) Page 79 of the draft, is headed ‘Development Proposals by Settlement’. The first bullet point explains that the settlement statements have been informed by the West Lothian housing land audits 2012-14 and reflect the capacity of development sites and the completion figures achieved at 31 March 2014. The third bullet point explains that the figures for housing on mixed use sites are an indicative capacity.
- b) A summary of housing land and other developments for Winchburgh is shown on pages 97 and 98. The figures for the two proposed new sites references H-WB 16 and 17 on page 97 are 250 each, a total of 500 new sites. However, these are gross figures. The net developable figure for site H-WB 16 as given in the MIR submissions on behalf of Aithrie Estates and the Hopetoun Estate Trust is 185 (see Doc 9) and for site 17, 200 (see Doc 10), a net loss of 115 units.
- c) The CDA sites in yellow on page 98 are not totalled but amount to 3,395. The completion figures for Winchburgh CDA in Housing Land Audit 14 for 2013

were 0 and for 2014 were 55 which results in a total of 3,450, which is the original figure for the Winchburgh development

- d) Appendix 2 on page 255 shows in the settlement table a figure of 4,243 as the total number of units for Winchburgh which may be a target. In order to compare this with the 3,450, the following deductions should be made:

New housing sites	68
New CDA sites	500
Unrecorded additions	225

On the basis that the council support the figure of 4,243, the shortfall of 225 should be added to the over-capacity figures of 115 for the two new CDA sites, a total of 340.

2. Proposed new sites in Winchburgh (new sites references H-WB 16(6) and 17(9) together with sites MIR references EO1-0193(1), EO1-0202(10), EO1-0203(11) and EO1-0204(12) [refer to Doc 9 locations with their reference numbers in parenthesis])

(Note: all the sites referred to as being part of the MIR submissions were party to a follow-up call from WLC for information on deliverability. It is not understood that any issues arose from this material. In addition, sites references 9, 10, 11 and 12 were the subject of a landscape assessment and site 1 by a separate landscape and mineral assessment, both of which are submitted as documents).

- a) The justification for proposing further land allocations is summarised as follows:
- i. Failure of the East Broxburn allocation
 - ii. Failure to achieve a 5 year effective housing land supply
 - iii. Paragraph 5.34 of the draft Plan
 - iv. Paragraph 5.46 of the draft Plan
 - v. Paragraph 5.61 of the draft Plan, and
 - vi. Doc. 7 accompanying these representations
- b) It should also be recalled that development in the longer term is discussed in the Winchburgh Future master plan. All of the development sites put forward in this representation, except site H-WB16, were suggested in Fig. 9.4 of the approved Master Plan for the longer term (the Figure itself has subsequently been deleted by amendment, but the text carries substantially the same proposals and is repeated here as Doc.13. Attention is drawn particularly to page 162, "Western Expansion" and "South Winchburgh").
- c) Aithrie Estate and the Hopetoun Estate Trust would be happy to discuss whether specific contributions to meeting need for affordable housing or other forms of demand housing such as PRS might be identified for some or parts of the proposed additional land

Site H-WB16 (6)

- This land forms part of the Winchburgh masterplan. It is allocated not for housing but for open space, tree planting, a woodland/wetland and a regional SUDS pond. Its location can be seen on Doc 13 phasing plan.
- The site is well-contained as follows: to the north/north-east by the M9 motorway; to the west by the haul road used to extract blaes from the Niddry Castle Bing and by the bing itself; and to the south-east by Ross's Plantation, this area being out with the masterplan and ownership. The land to the west of the haul road is allocated for housing development

- Consideration will require to be given to any landscape issues when development of the site is proposed.
- While it would be possible to effect access across the haul road, this feature will create noise, dust and amenity issues for as long as the bing depletion and the use of this haul road continues. This feature and noise issues associated with the M9 will require mitigation and probably loss of some land. The Master Plan for Winchburgh states that: *“A key objective that has influenced the direction and phasing of development, has been the desire to keep the haul routes used by the HGVs to remove material from Niddry Castle Bing, and new development, separate for as long as possible”* (para 9.8).
- The net developable area will be restricted hence the indication of the net site product of houses of 189. It is assumed that the site is unlikely to be developed within the next 5 years and possibly not within the period of the proposed LDP, dependent on the rate of depletion of the bing.

Site H-WB17(9)

- There appear to be few constraints that would affect development of this site. Detailed mining records available to the Estate show no evidence of mine workings or indeed the presence of minerals. Although to the north of the site is where the oil works stood and where waste blaes was deposited on what is now the Niddry Castle Bing, contamination of the northern edge is considered to be remote from any sources of contamination arising from the oil works.
- Access will initially be via Castle Road, but as shown on Doc. 9, a new road will be constructed to the east in due course possibly associated with adjacent development.
- The site was included in a landscape assessment as shown in Doc.6 and information supplied to the council at the MIR stage on deliverability.
- In view of the proximity of the rail line to the west it is assumed there will be some site loss in order to mitigate such impacts, hence the suggested net site product of 185 rather than the 250 shown in the draft LDP

Site EO1-0193(1)

- This land was proposed at the MIR stage and supported by the council as an alternative site to H-WB17. The comment given by the council on the submission included the statement: “MIR as it was associated with the development already under way at Glendevon”. On this basis, it is clear the MIR submissions found favour with the council on their merits. The site is pleasant and would provide an excellent environment for a range of housing opportunities. It has easy access to the B9080 and is close to the site of the proposed new schools and other amenities associated with the development of Winchburgh. It would make a natural westward extension to the developing Winchburgh as implied in the responses to the MIR submissions.
- For the sake of completeness, the document dealing with landscape and minerals is attached to these representations (Doc. 11).
- The net developable capacity of the site, taking account of the findings of Doc 10, is estimate to be 300 houses to be built in phases.

Site EO1-0203(10)

- This site would be without question a natural extension to the village southwards. It lies immediately to the south of the community hub of the village. While the northern portion is currently a park, it requires upgrading. The park is owned by Hopetoun. It is envisaged it would be upgraded as a requirement in any development. The cemetery is required to be extended and land would be made available for that purpose if required. Part of the site is occupied by the current sew-

age treatment works for the village; but the proposal is to redirect effluent, possibly to S Queensferry when the present works will become redundant (although a pumping station may remain). Existing footpath links to the wider countryside will be maintained and enhanced.

- There appear to be few constraints that would affect development of this site. Detailed mining records available to the Estate show no evidence of mine workings or indeed the presence of minerals. The site was included in a landscape assessment as shown in Doc.6 and similar information supplied to the council at the MIR stage on deliverability. No adverse comments were made. However, the council sees the site as unacceptable.
- The exact boundary of development to the south will have to be determined in more detail. But one issue is the intrusion into the country side belt from the proposed East Broxburn development site H-BU10 to the immediate south, to which objection has been made. It is somewhat disingenuous of the council to object to this site when approving the adjacent site in East Broxburn.
- The net developable capacity of the site is estimate to be 130 houses with present restrictions.

Site EO1-0202(11)

- The site would be a natural extension south and east of the existing urban envelope. There is an opportunity to incorporate lower density executive homes here which will add to the range and choice of homes to be expected in a growing community
- The site represents a sustainable location being convenient to all existing and proposed services, to village amenities and to all existing and proposed public transport routes
- There is an opportunity to utilise existing canal and burn corridors for wider pedestrian and cycling integration to WLC Core Pathways. As a result, development would assist the recreational and heritage opportunities in the “countryside belt” between Broxburn and Winchburgh.
- There appear to be few constraints that would affect development of this site. Detailed mining records available to the Estate show no evidence of mine workings or indeed the presence of minerals. The site was included in a landscape assessment as shown in Doc.6 and information supplied to the council at the MIR stage on deliverability. It is accepted that landscape represents an issue where care will be required in defining the southern boundary. Such considerations and the lower density envisaged result in a net developable capacity of 130 homes

Site EO1-0203(12)

- This area is recognised as being sensitive but was nevertheless included as part of potential development to the south and west of Winchburgh in the submitted Master Plan for the longer term. The view is taken, possibly in association with the steadings here, that there is scope for limited lower density enabling development to the north of the site. This would not only contribute towards providing a range and choice of housing opportunities very close to the existing village but would also produce funds to help achieve one of the Winchburgh Master Plan objectives which is to provide a heritage park and interpretation facilities concerning the shale mining in the area.
- There are no known site constraints which would prevent some limited development from taking place.

If you wish to make comments please begin by selecting the relevant Appendix(es) of the Proposed Plan from the list below.

Appendix 1 – Employment Land Allocations (page 99)

Appendix 2 – Schedule of Housing Sites / Site Delivery Requirements (page 119)

Appendix 3 – Schedule of Land Ownership (page 259)

Appendix 4 – LDP Supplementary Guidance (SG) and Planning Guidance (PG) (page 265)

Appendix 5 – List of Policies (page 273)

Appendix 6 – List of Proposals (page 275)

Please use the text box below for your comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Appendix 1 – Employment Land Allocations (page 99)

Appendix 2 – Schedule of Housing Sites / Site Delivery Requirements (page 119)

Appendix 3 – Schedule of Land Ownership (page 259)

Appendix 4 – LDP Supplementary Guidance (SG) and Planning Guidance (PG) (page 265)

Appendix 5 – List of Policies (page 273)

Appendix 6 – List of Proposals (page 275)

11. PROPOSALS MAPS

The LDP comprises a series of five maps which define settlement boundaries and illustrate land use zonings.

Do you wish to make a comment?

Yes*

no

If you wish to make comments please begin by selecting the relevant Proposals Maps from the list below.

Proposals Map 1 - West Lothian

Proposals Map 2 - Linlithgow & Broxburn Area *

Proposals Map 3 - Livingston Area

Proposals Map 4 - Bathgate Area

Proposals Map 5 - Villages

Please use the text box below for your comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Proposals Map 1 - West Lothian

Proposals Map 2 - Linlithgow & Broxburn Area

The map should be altered to show the new sites proposed in the attached representations, to delete the sites referred to in Broxburn and to delete the northern portion of site H-BU 10 as proposed

Proposals Map 3 - Livingston Area

Proposals Map 4 - Bathgate Area

Proposals Map 5 - Villages

12. ACCOMPANYING DOCUMENTS

Alongside the LDP is a suite of documents which are required by statute as part of the preparation and supporting evidence for the LDP.

Do you wish to make a comment?

If you wish to make comments please begin by selecting the relevant Accompanying Documents from the list below.

Strategic Environmental Assessment (SEA) Environmental Report.

Equalities & Human Rights Impact Assessment (EQHRIA).

Strategic Flood Risk Assessment (SFRA).

Habitats Regulations Appraisal.

Transport Appraisal (TA).

Action Programme.

If you wish to make comments please begin by selecting the relevant Accompanying Documents from the list below.

Strategic Environmental Assessment (SEA) Environmental Report.

Equalities & Human Rights Impact Assessment (EQHRIA).

Strategic Flood Risk Assessment (SFRA).

Habitats Regulations Appraisal.

Transport Appraisal (TA).

Action Programme.

Please use the text box below for your comments.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Strategic Environmental Assessment (SEA) Environmental Report.

Equalities & Human Rights Impact Assessment (EQHRIA).

Strategic Flood Risk Assessment (SFRA).

Habitats Regulations Appraisal.

Transport Appraisal (TA).

Action Programme.

13. ADDITIONAL COMMENTS

Do you wish to submit any additional comments on the LDP?

* yes

no

Please use the text box below for your additional comments on the LDP.

Your comments should be concise and limited to no more than 2,000 words. You should fully explain the issues you wish to be considered when the Proposed Plan is presented to Scottish Ministers for Examination. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written.

Several documents accompany these representations and are referred to in various sections. They have been forwarded separately to the council with a covering letter. In view of difficulties in using the portal – no drafts can be stored and circulated, documents cannot be added, text is altered and text boxes are too small - a Word version of the representations is added to the list

Before pressing the submit button please review your submission and make any changes. Once you have pressed SUBMIT you will be unable to go back to the survey.

Once we have received your submission we will send you a copy for your records. This could take up to 5 working days. If you do not receive a copy in that time please contact the Customer Service Centre.

Politicians urged to "get housing sorted" so Scotland has enough homes

05 NOVEMBER 2015

3



Scotland's home building industry is today highlighting the need for at least 100,000 homes of all tenures by the end of the next Scottish Parliament in order to tackle Scotland's housing crisis.

Referring to the 50,000 and 60,000 affordable housing targets recently announced by the SNP and Labour respectively, Homes for Scotland Chief Executive [REDACTED] (*right*) called on politicians of all parties to paint a complete picture of Scotland's housing requirements.

Preparing to speak to an audience of more than 120 senior industry representatives and other stakeholders in Edinburgh, he said:

"In order to make our country a better place in which to live, work and invest, it's essential that we have enough homes of the right types in the right locations to meet the diverse housing needs and aspirations of our growing population. This is fundamental to achieving the fairer society we all want to see.

"But a continuing focus on publicly subsidised affordable housing targets tells just one part of the story. What about the majority of Scots who still want to own their own home or those who want the flexibility of renting in the private sector?

"The fact is that the total number of new homes being built remains 40 per cent down on 2007 levels, exacerbating the housing pressures which particularly affect our young people and growing families.

"Providing more affordable housing is obviously a key part of addressing the overall chronic undersupply of homes. However, this can only be achieved through an all-tenure approach, particularly given the major direct contribution the private sector makes to affordable housing.

"Quite simply, we need our politicians to get housing sorted so the people of Scotland have the homes that they need, whatever the tenure type.

"This is why we are calling on the next Scottish Government to manage a return to at least pre-recession levels of building which would mean at least 100,000 new homes by the end of the next parliamentary term based on an annual average growth rate of ten per cent. We believe this is an ambitious but achievable target and have set out in our manifesto the action which needs to be taken to make it happen."

The wide-ranging benefits of significantly increasing the number of new homes being built are reinforced in a new research report also being published today.

As well as highlighting positive social impacts, including improving health and education outcomes and fighting fuel poverty, the report also shows that the 15,562 homes built last year supported over 63,000 jobs (equating to over four jobs per home) and generated some £3.2 billion in Gross Value Added. It also projects the potential annual uplift if build rates are increased to c25,000 pre-recession levels.

██████████ of Nathaniel Lichfield & Partners, the consultants undertaking the research, said:

“The need to increase the supply of housing is rising up the Scottish political agenda and our analysis shows that if home building can return to pre-recession delivery rates it will produce some major economic benefits, including an additional £443m of capital expenditure, £1.9 billion extra economic output and almost 38,400 extra jobs.

“These positives are on top of the structural economic benefits that will arise from Scotland having a housing market that meets the needs of its population, improves macro-economic stability, supports the labour market and facilitates the development of sustainable communities that are vital to economic prosperity.

“Scotland must deliver more new homes in order to help secure a prosperous economic future and given the scale of the economic benefits at stake, it is critical that the issues currently constraining supply are resolved.”

HOUSING
MARKETS
WEST
LOTHIAN

JOHN BROWN

John Brown and Company Ltd.

STATEMENT BY

JOHN BROWN FRICS MRTPI FRSA DLE

The Significance of West Lothian as a Housing market

1 .Additional housing allocations

The submission to the Council on behalf of Aithrie and Hopetoun estates, the owners of land in Winchburgh, West Lothian recognises the significant contribution West Lothian has made and continues to make to the Lothian regional Housing stock particularly for new home delivery in the last 5-10 years.

Edinburgh has chosen to ignore the shortfall in its required Housing Numbers shown by recent Audit numbers. Edinburgh has placed emphasis on delivery of housing numbers through rezoning of former industrial areas such as the Edinburgh Waterfront. Reliance on the economics of delivery is based on capability of the developer and the land owner to achieve a receipt and acceptable level of return from development usually through higher density. Should markets not accept such a mix through lack of demand, market alteration or essentially wrong product, the land may not be developed. Edinburgh has underperformed in achieving its housing targets.

Reliance on unit numbers coming from such densities set to a planning delivery time table is flawed. The Edinburgh Waterfront is further reduced by withdrawal of part of the land supply by Landowners {Forth Ports} and remix of density to lower numbers by others {National Grid}. The numbers once proposed and allocated are no longer tenable or reliable. Edinburgh's LDP2 wrongly interprets land supply and likely densities. West Lothian has been the recipient of much of the resultant latent demand for housing particularly family homes over the last 20 years. The latest Planning thinking indicates demand in West Lothian will increase because of the shortfall housing in Edinburgh and the infrastructure and community benefits West Lothian offers.

Winchburgh land allocations in the last 4 years have been well contested by house builders seeking to provide 2 storey speculative housing at around 1000-1800 sq. feet per unit, densities per net developable acre are around 15000 sq. feet. Homes at lower density are a priority to allow growth of continued need for family living space and garden requirements. Price points for housing are a priority. The Edinburgh Housing market with its reduced supply of existing family homes coming to the market and little "greenfield development " land availability has not resolved demand through lack of supply of land for family homes. Winchburgh as a CDA has proven to be an effective land supply for developers seeking to provide family housing. *Effective land* for development in the immediate future is a Planning essential.

Two land owners agreed at Winchburgh to create a development which could allow land release. This has proven to be a success delivering new homes. The next stages of development opportunity should be acknowledged within the emerging Local Plan and continue the *availability of sites* to meet the market demand. The infrastructure established the critical mass and tenures for Housing.

Planning does not recognise market pricing points and density/house type changes which markets may require. Winchburgh is providing well priced Housing through developers competing. Flexibility in interpretation to allow market change in layouts is a recommendation. Apparent planning merit in site selection but with untested understanding of a site's delivery can led to delay.

Under supply of land can create circumstances where demand for housing is such that values rise then allowing sites which did not have the same economic development prospects to be reconsidered. Edinburgh house prices reflect the development restraint policy and that is why they are amongst the highest in Scotland. Reliance on improved house prices and fixed land costs are often the reason it has taken so long to create some well- known approved development. Land hoarding or ownership disagreements awaiting market forces to alter values or control of supply applies to some sites allocated within West Lothian which are not yet started.

The supply of mortgage money is a vital factor, alongside job security and employment and general economic / social well -being. People enjoy living in a community with a balance of facilities. Adding future land supply to an already established housing location offers a new influx of housing suited to the market and people. *Confident markets should be stimulated* not inhibited. Winchburgh is a confident market. The *balance of housing type* is a fundamental for future housing requirements. The Winchburgh community is at the Core while new developments are supporting this with a sustainable level for services and facilities.

Allowing the suggested additional numbers at Winchburgh within the emerging LDP, for example the area known as the "Fingers " SITE EO1-0193, there is opportunity to add to the Housing land supply a valuable effective contribution of land capable and available for development. Here could be family housing but with a lesser density while within the town higher density can be created closer to the proposed rail station. Winchburgh is well suited to provide a range of choice of housing opportunities.

2. WEST LOTHIAN, existing HOUSING Markets

Recent statistics produced by ESPC on the Local housing markets demonstrate the price point which West Lothian offers in East Central Scotland. With development land availability and housing type choices it should continue to offer excellent value delivery and a sustainable housing market over the future years. Supporting mainstream delivery of family style Homes in a popular choice of location such as Winchburgh is vital. Given additional facilities to the community and the real prospect of growth of housing demand the town will emerge as a primary Housing area within West Lothian, a *preferred choice location*.

Recent ESPC statistics,

ALL PROPERTY October 2015

West Lothian - £169,651 average property price

East central Scotland- £209,506 average property price

Edinburgh- £223,489 average property price.

The West Lothian average house price is a significant factor in Housing Choices. Affordable in the real use of the word to the average family in the Lothians or a bigger house likely if that is the choice.

Reference: <https://espc.com/media/797739/hrp201510.png>

Reputation is the key to an area brought about through circumstances and information now available through internet research [crime rates, school exam results etc. house prices}. The real reasons why people want to live and work is value in lifestyle and affordability. Housing choice, Schools, health centre, transport, shopping, and sense of place are all factors which apply to Winchburgh - a town once lost in decline now found again through a good range of new homes being available and the choice of developer models. *An exemplar of Planning decisions*, land availability and product choice.

To create attraction and deal with demand having 5 House Builders working demonstrates the *cumulative effects of development* - land take has been quicker than any other local area.

Adding opportunity by *additional land for housing* at Winchburgh in the LDP allows continued re-engagement of Winchburgh with a differential of housing models in a place people want to live and housebuilders seek to build.

JOHN BROWN Chartered Surveyor & Development Consultant

[REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

Winchburgh

Representations on behalf of Aithrie Estates and Hopetoun Estate Trust

Calculation of shortfall in supply in meeting Appendix 2 figure of 4,243 for Winchburgh

Original capacity of Winchburgh proposals	3,450
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Development Proposals by Settlement pp 97 and 98 CDA total (sum) 3,395 plus Audit 14 completions 55 =	3,450
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Add proposed new sites:

H-WB14	11
H-WB15	27
H-WB16	250
H-WB17	250
H-WB18	30

Total additions	568
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Total land	4,018
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Shortfall	225
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Further shortfall arising from net capacity of sites 16 and 17	115
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New Total shortfall	340
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New Total Appendix 2	3,903
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The 5 year effective housing land supply 2014 – 2019

At March 2014 snap-shot

Sources: SDP1 requirement and land Audit 14
(Compare Fig 5 in draft LDP)

(A) West Lothian LDP Housing Land Requirement 2009 - 2019	11,420
(B) Generosity allowance @ 20%	2,284
(C) Effective supply 2014 - 2019	4,422
(D) Housing completions 2009 - 2014	2,440
(E) Demolitions	-568
(I) Total Supply (C+D-E)	6,294
Shortfall (A+B) – I	7,410

Fresh help for home buyers

Downloads

04/11/2015 11:00

Scotland

Housing

More funding to help home seekers get foot on property ladder.

Funding for a Scottish Government scheme which helps people get on the housing ladder is being increased by £10 million, Social Justice Secretary [REDACTED] confirmed today.

Investment in the Open Market Shared Equity Scheme (OMSE), which helps eligible first-time buyers on low to moderate incomes buy a home on the open market, will top £80 million in 2015/16.

Assistance is in the form of an interest-free loan with eligible buyers required to purchase between 60 and 90 per cent of the value of a home, for sale on the open market, within certain price thresholds.

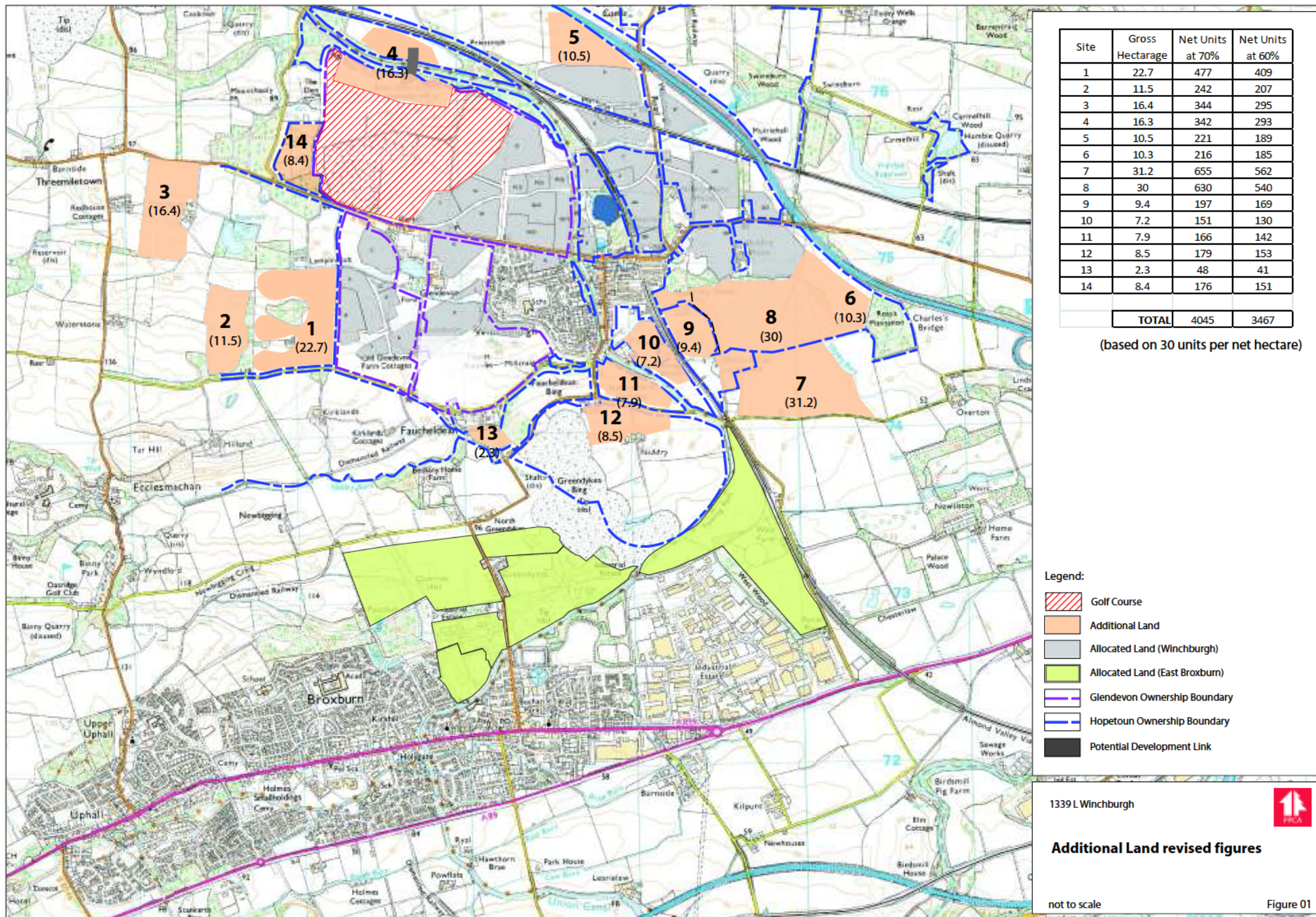
In Livingston, Social Justice Secretary [REDACTED] visited the home of [REDACTED] and [REDACTED] [REDACTED] who purchased a home with assistance from the scheme.

[REDACTED] said: "We want to help young people on low to moderate incomes to access home ownership where this is sensible and sustainable for them.

"Our popular OMSE scheme helps first time buyers, like [REDACTED], who would not otherwise be able to afford to buy their first home to get a foot on the housing ladder.

"OMSE provides priority access to social renters, disabled people, and members of the armed forces although it is open to all first time buyers. It also helps 'second-steppers' to be able to sell their home and to move to a new property.

"Since 2007, our Low Cost Initiative for First Time Buyers (LIFT) shared equity schemes have helped over 10,000 people get a foot on the property ladder."



Site	Gross Hectareage	Net Units at 70%	Net Units at 60%
1	22.7	477	409
2	11.5	242	207
3	16.4	344	295
4	16.3	342	293
5	10.5	221	189
6	10.3	216	185
7	31.2	655	562
8	30	630	540
9	9.4	197	169
10	7.2	151	130
11	7.9	166	142
12	8.5	179	153
13	2.3	48	41
14	8.4	176	151
TOTAL		4045	3467

(based on 30 units per net hectare)

Legend:

- Golf Course
- Additional Land
- Allocated Land (Winchburgh)
- Allocated Land (East Broxburn)
- Glendevon Ownership Boundary
- Hopetoun Ownership Boundary
- Potential Development Link

1339 L Winchburgh



Additional Land revised figures

not to scale

Figure 01