

9 Phasing and Implementation

9.1 Introduction

As one of the most prominent, long-term and comprehensive settlement planning projects in Scotland, it will require the coordination and planning of several activities. It will equally involve many different partners – developers, landowners and the Council to name only a few – that will need to be drawn together in a cohesive manner in order to deliver the best results.

Regenco's phasing strategy for development, infrastructure, landscape and community facilities will ensure the development will feel like a "natural" growth of the settlement areas. It is important that the implementation of development accounts for important issues such as changes in economic circumstances, variations in the land-use mix, its location, the rate and scale of development, improvements to the transport network, the timing of remediation and infrastructure works, the property market demand and supply, community regeneration projects, land assembly, development funding, infrastructure costs, site constraints and planning policy or windfall sites like Niddry Castle Bing. Hence the fundamental need for flexibility.

Regenco is also aware that the shape of new communities and quality of development will depend on strong long-term leadership and management to ensure that the overall vision and framework that is established in the Local Plan and Masterplan is maintained and that ad-hoc and incongruous development is avoided. Therefore, an important and parallel strand of work will be to discuss and establish the best delivery mechanism.

The development and construction of the settlement extension at Winchburgh is anticipated to take at least 15 years. The proposed phasing programme – which integrates road infrastructure, landscape and buildings – has been devised to ensure that the growth of Winchburgh is achieved in a coherent and logical fashion within a strong and well-structured landscape framework.

Given the scale and complexity of the proposals and the likely timeframe for completion, the phasing will be crucial to a successful construction process and relate to the:

- Transport Assessment;
- Environmental Assessment;
- timing and take-up rates for town centre and employment uses; and
- residential completions per annum.

9.2 Overall Phasing Strategy

Further consultation and discussion with consultees and interested parties - in relation to future expectations, information requirements and commitments on the sequence of development and associated infrastructure is fully expected as the development progresses into the detailed design and implementation phases.

The proposed strategy, presented in this chapter and illustrated in Figures 9.1 to 9.4 sets out the key principles for phasing and the broad direction of development and infrastructure construction. The direction and scale of development described in this chapter and illustrated in Figures 9.1 to 9.4 is indicative only. Development is currently envisaged to be built with an average annual residential completion-rate of approximately 200-250 units per annum up to 3,450 dwellings, subject to securing the appropriate necessary consents and permissions. The anticipated number of dwellings identified in each phase reflects the fact that the pace of development will be directly influenced by the factors described in the introduction to this chapter. The key guiding principles are to:

- begin construction where development can take advantage of existing infrastructure and where new and existing residents can benefit from any new facilities;
- ensure development takes place in a sequence that "feels" like it is planned and not as a series of disparate and isolated pockets;
- design and construct an appropriate amount of the landscape and public realm proposals simultaneously with development, to help create a new setting and identity for Winchburgh;
- ensure that the appropriate level of community, education and town centre facilities are in place to meet demand;
- provide the transport facilities – particularly the rail station and M9 motorway junction; and
- minimise the disruption caused by construction activity to local residents and road users during the development programme.

9.3 West Lothian Council Requirements

In response to West Lothian Council requirements for an implementation programme, this Masterplan:

- identifies when key infrastructure should be provided or constructed;
- provides information on the anticipated number of house completions per annum;
- identifies the indicative order in which the development of sites should take place;
- identifies when strategic open spaces should be formed and when structure planting should be planted; and
- identifies measures to be taken to minimise the impact of construction work and traffic on existing communities.

Specifically:

- The new M9 junction at Duntarvie and the new roundabout to access the future business and employment areas north of the railway at Myreside are programmed for construction to begin in the medium term phase. Despite this, the new M9 junction is a priority project and Regenco hopes that its construction could be completed sooner, bringing forward the potential economic and community benefit for West Lothian. The Masterplan proposes that up to 1,000 homes could be built prior to construction of the junction in accordance with the Section 75 and Planning Conditions Timeline and the Councils understanding that some development will be able to take place prior to the junction's completion. Regenco will continue to discuss with West Lothian Council and the Scottish Government regarding the overall transport assessment and issues surrounding the delivery of the major transport infrastructure; and
- Regenco acknowledges that the Auldcaithie Landfill Site must be restored as part of implementing the overall development and considers that it has potential for alternative uses once remediated, such as playing fields and/or golf course as well as woodland or parkland. A programme for implementing the formulated solution together with possible recreational use will be prepared.

9.4 Strategic Integration Plan

In addition, the implementation and phasing programme for the common infrastructure required by the Council to support both the development proposals at East Broxburn and Winchburgh should be identified, in accordance with the Local Plan paragraph 7.87, in a Strategic Integration Plan jointly prepared by the CDA developers. This will be prepared separately to the Masterplan for Winchburgh. The key issues and common infrastructure projects that are anticipated to be addressed in the Strategic Integration Plan are listed in the CDA Action Plan, which is contained in appendix 7.1 of the West Lothian Local Plan.

The specific requirements, phasing and funding of these issues will be discussed in more detail as part of the ongoing working relationship between **Regenco**, the East Broxburn developers and the Council.

9.5 Off-site Works

Road and Transportation

Beyond the motorway junction, which is planned for construction in the medium term phase, consideration has been given within the Transport Assessment, to the surrounding road network. The impact of the proposed development has been analysed and where applicable mitigation measures identified. **Regenco** will work closely with West Lothian Council Transportation Department to identify mitigation measures.

Utilities

Of the four primary utility services only gas is available locally to the proposed expanded settlement with the appropriate capacity. The other services - electricity, potable water and foul water - require to be appropriately reinforced from off-site sources. Due to the nature of the proposed extension it is considered that the earliest phases of development will utilise any residual capacity available in the existing treatment works for potable and foul water and any electrical load availability. It is considered that towards the end of the short term that the following key infrastructure reinforcement works will be required:

- Electricity** - From work undertaken, to support the scale of development proposed within the Masterplan, it has been identified that a 33kV/11kV primary substation is required to provide power to the development in the short to medium term. A network operator in conjunction with Scottish Power Systems will provide these works on behalf of **Regenco**. Underground cables are required to run from the Broxburn Grid located at Drumshoreland Lodge to the extended settlement. It takes approximately eighteen months from receipt of order for the provision of the new primary sub-station and six months to install the new site-wide power infrastructure.
- Potable Water** - In a similar manner to electricity the potable water supply for Winchburgh requires to be reinforced in the short to medium term. Winchburgh Potable Water is provided by Pateshill WTW which supplies water to the local Service Reservoir at Waterstone, west of Winchburgh. This structure is a buried tank with a water storage volume of 900m³. Water is conveyed between Waterstone and Winchburgh via a trunk main. Scottish Water has confirmed that there is adequate capacity at Pateshill WTW however, the service reservoir at Waterstone does not have sufficient storage to serve the entire site. A limited amount of development in the early phases can be served by the existing infrastructure. The Waterstone Service Reservoir will be increased in size in conjunction with trunk main upgrades to provide the required potable water supply for the full development.

- Foul Water** - Within Winchburgh, foul water is conveyed via a combined sewerage system to the Sewage Treatment Works adjacent to the Golf Club. This facility has a limited capacity for the early phases of development. The extended settlement at Winchburgh will require to discharge into an alternative foul water system to deal with the proposed development flows. This additional provision will be undertaken by Scottish Water on behalf of **Regenco**. Scottish Water has considered the requirement for Winchburgh and decided that a new treatment works at South Queensferry is their preferred solution. The foul water solution will be delivered in the short to medium term.

9.6 Short-term Phase (Years 1-5)

Development started this Phase:

- Residential development blocks K, M, Q(1), Q(3), Y and AA (Upto 550 units)
- Non-Denominational and Roman Catholic secondary schools
- Extension and refurbishment of existing primary schools in cooperation with West Lothian Council
- Beatlie Roman Catholic primary school (Block BB)
- Restoration of Auldathie Landfill Site
- Strategic Landscape: Auldathie Park, western woodland, Auldathie Gardens (part) and nature park
- Regeneration of existing Winchburgh centre in cooperation with the Community Council (contributions)
- Improvements to existing neighbourhood park (contributions)

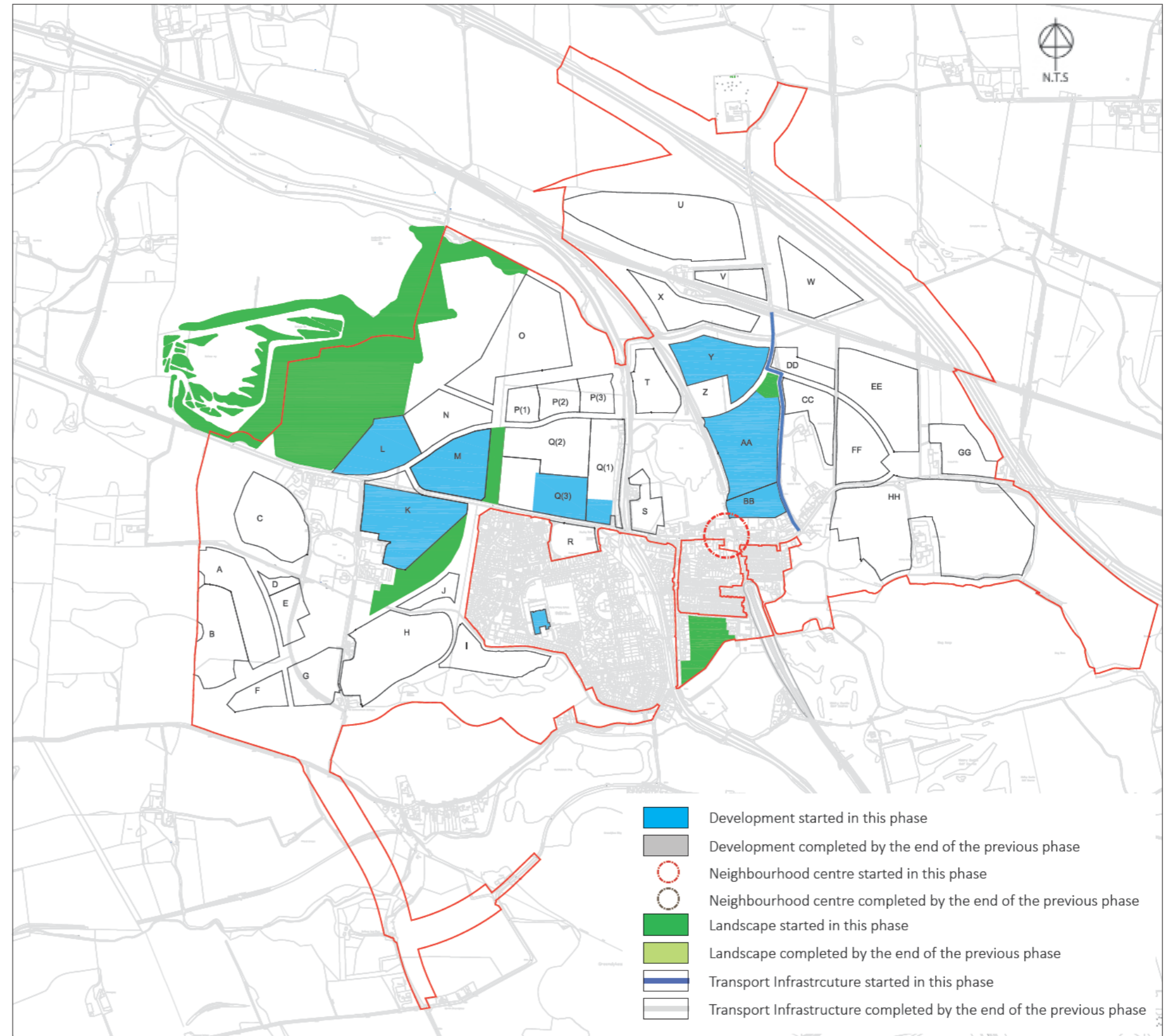


Figure 9.1: Early Development Phase: Years 1-5

9.7 Medium-term Phase (Years 6-10)

Development completed by the end of previous phase:

- Residential Development Blocks K, M, Q(1), Q(3), Y and AA
- Extension and refurbishment of existing primary schools in cooperation with West Lothian Council
- Beatlie Roman Catholic primary school (Block BB)
- Strategic Landscape: Auldathie Park, western woodland, Auldathie Gardens (part) and nature park

Development started this Phase:

- Residential development blocks C, E, G, H, J, K (part), N, P, Q (part), CC, DD, EE and FF (Approx 1,400 units)
- Commercial development (Blocks U)
- Park and Ride facilities (Block V)
- M9 junction
- Potential for existing primary schools site to become site of new non-denominational primary school following relocation of roman catholic primary
- Canal basin
- Hawkhill Neighbourhood Centre
- Strategic Landscape: Auldathie District Park, Auldathie Gardens (part), Town Park, Craigton Park, Glendevon Neighbourhood Park, northern woodland and Swine Burn Linear Park

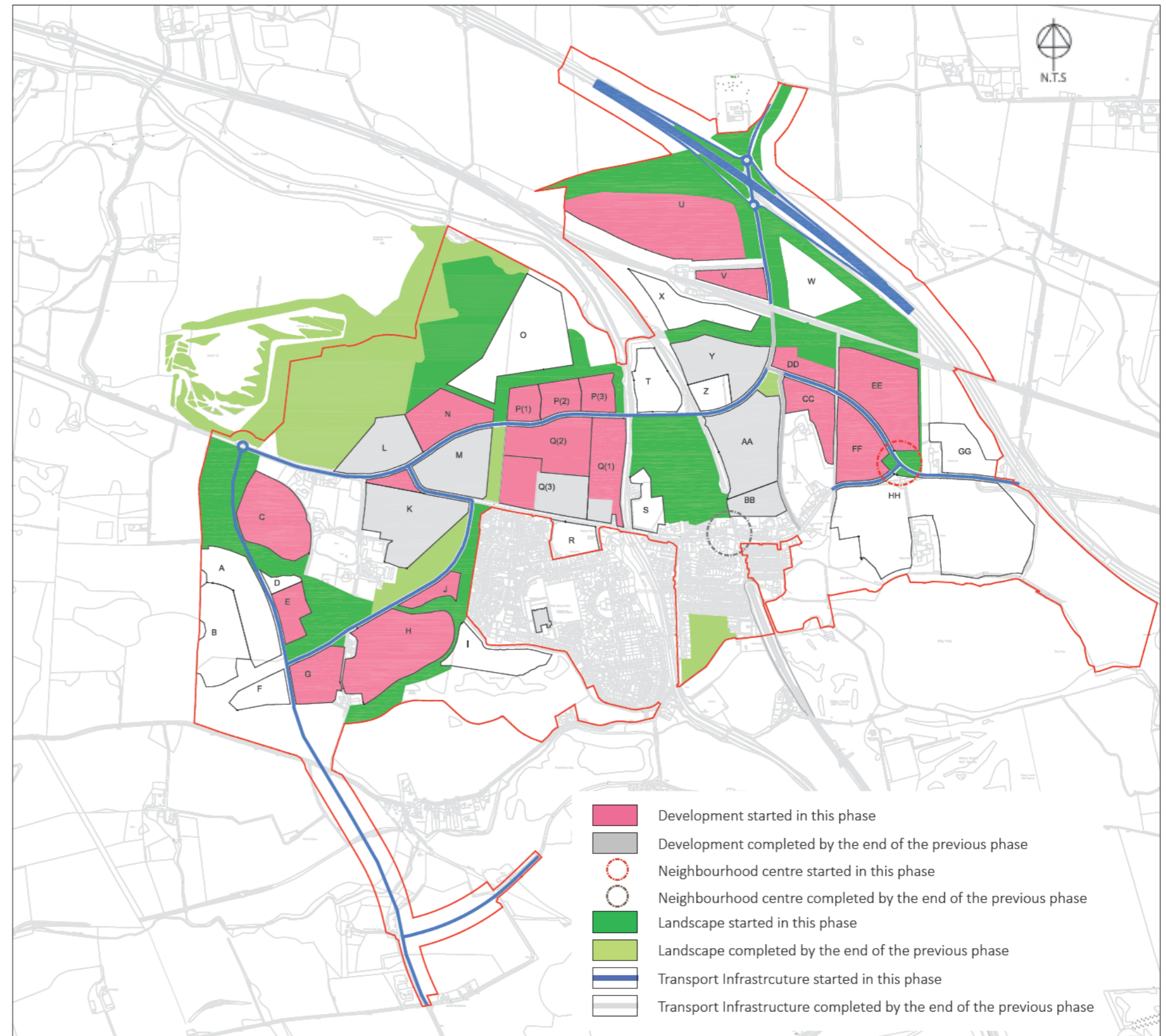


Figure 9.2: Medium Development Phase: Years 6-10

9.8 Long-term Phase (Years 11-15)

Development completed by the end of previous phase:

- Residential development blocks C, E, G, H, J, K (part), N, P, Q (part), CC, DD, EE and FF (Approx 1,400 units)
- Commercial development (Blocks U)
- Park and Ride facilities (Block V)
- M9 junction
- Restoration of Auldcathie Landfill Site
- Glendevon Primary School (Block E)
- Non-Denominational and Roman Catholic secondary schools
- Canal basin
- Hawkhill Neighbourhood Centre
- Strategic Landscape: Auldcathie Park, Auldcathie Gardens (part), Town Park, Craigton Park, Glendevon Neighbourhood Park, northern woodland, Swine Burn Linear Park and western woodland and nature park
- Strategic Landscape: Auldcathie Park, Town Park,

Development started this Phase:

- Residential development blocks A, B, D, F, I, O, S, T, X, GG and HH (Approx 1,500 units)
- Commercial development blocks U
- Railway station
- Park and Ride (Block Z)
- Glendevon Neighbourhood Centre
- Strategic Landscape: eastern woodland and Hawkhill neighbourhood park

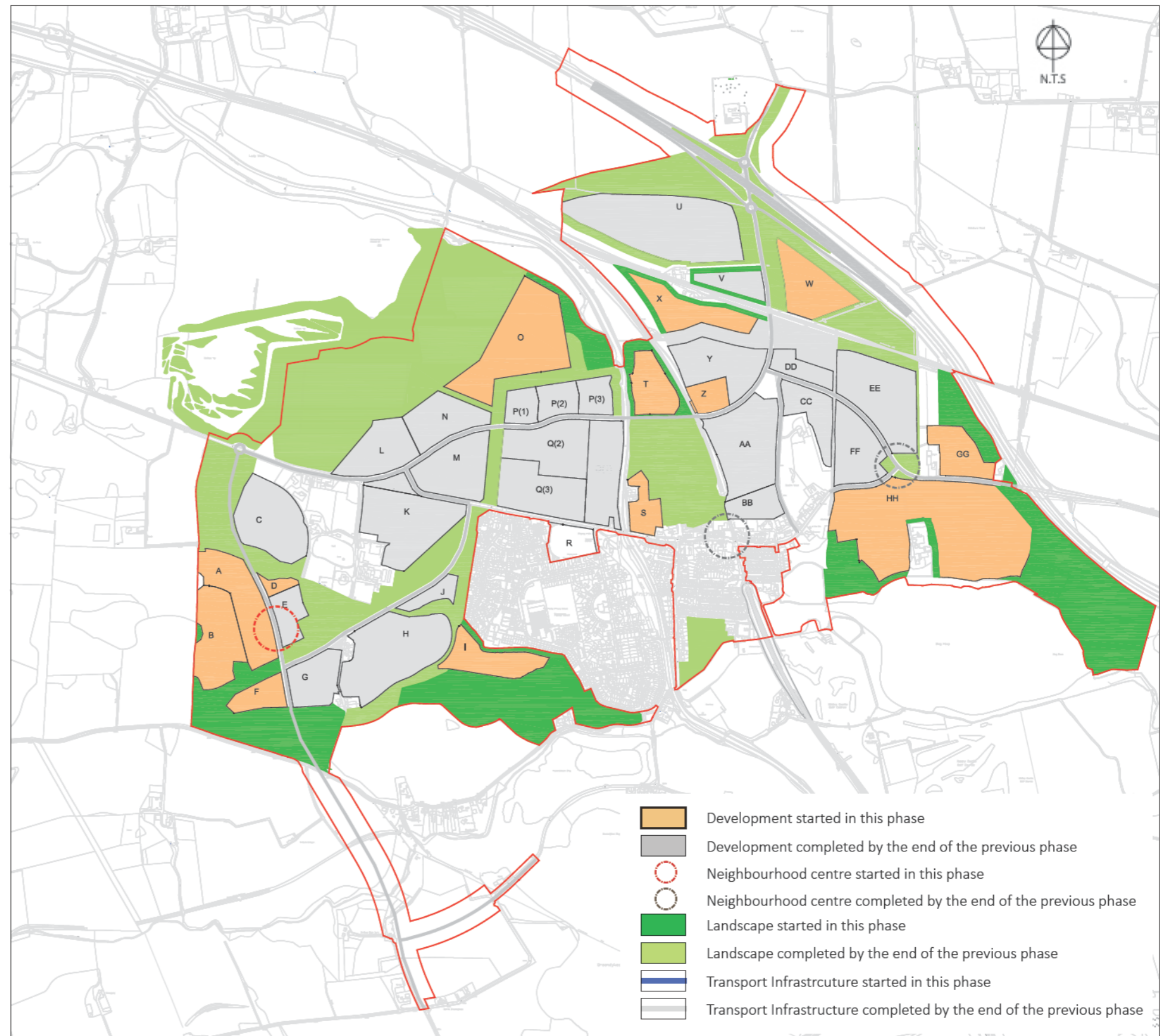


Figure 9.3: Long Development Phase: Years 11-15

9.9 Growth and Flexibility

Successful places create successful communities and a demand for future growth. Urban places are dynamic and experience continual change. As such, this Masterplan and its implementation strategy for the proposed large scale and comprehensive growth of Winchburgh allows for the eventuality that the settlement may continue to grow and intensify in a sustainable manner during and beyond the current proposals. Therefore, the development framework set out in Chapter 7 has been designed from the outset to be flexible and adaptable without the having to “tear up” or revisit the guiding principles or “redo” the ordering elements of the framework itself. This is not a rigid or static blueprint and it is of fundamental importance to retain this degree of flexibility within the Masterplan so that it is able to adapt to future changes that may arise. In order to plan for potential future growth (recognising that high quality places like this inevitably change and grow through time) it is prudent to set out “flexible development areas” that could be considered for future growth beyond the requirements of the current Development Plan. These will help ensure that:

- additional design work, information on potential constraints and changes in policy and/ or regulatory issues can be gathered at an early stage to inform the detailed layouts and implementation;
- additional land options are available for considering solutions to the betterment of the settlement should it be required;
- there is sufficient scope to avoid land significantly adversely affected by ground conditions and still achieve the requirements and aspirations of the Local Plan, land owners and developers in terms of land-use mix, quantities and character; and
- allow for the optimum and efficient use of land so affected including where necessary cost effective ground treatment, rather than eliminate land at any stage.

The “flexible development areas” are not part of the outline planning application that this Masterplan applies to. In identifying the direction of future growth, respect for local constraints and opportunities – particularly in relation to environmental, geotechnical and landscape matters – needs to be taken into account to ensure that any development, should it take place, is sensitive to the inherent qualities of the area. In addition, the development of this area, should it ever come forward would be governed by, as a minimum, the same development principles and design guidance as set out for the core settlement area established by this Masterplan. This would be updated to reflect any changes in land-use planning policy relevant at the time.

The design and pattern of the settlement extension, together with the location of community and transport facilities as set out in the Masterplan has been carefully structured to accommodate continued growth as if it were a natural extension to the settlement.

It must also be recognised that in meeting Structure Plan requirements, it is essential to ensure that sufficient effective land is allocated and safeguarded for future residential and associated development. The “flexible development areas” represent land beyond the Local Plan period and/or where flexibility in terms of land-use should be retained to allow the pattern of development to respond to the need for future growth/change and the treatment of adverse ground conditions if required. This would be based on an infrastructure-led approach i.e. building on the solid foundations established by this Masterplan. The aim is, therefore, to assist the development process by ensuring that land is identified in the most sustainable places to meet Structure Plan housing requirements without the need for significant alteration to the Masterplan development framework.

Several alternatives to the proposals for Winchburgh put forward in this Masterplan were tested through the Public Local Inquiry process held into the Finalised West Lothian Local Plan 2005. All were rejected in favour of the Winchburgh expansion proposal. Therefore, as part of sustainable strategy for future economic growth at Winchburgh, flexible development areas include:

Western Expansion

The western flank beyond the Masterplan area presents a unique opportunity for a mix of housing, economic, recreational, community and educational uses set within in a strong and well established landscape setting. It is envisaged that, should development take place on the former landfill or land beyond, it must capitalise on, and dovetail with, the facilities and uses provided within the current Masterplan area - particularly the Auldcaithie Park and secondary school campus, the strategic woodland planting and associated path network and the Glendevon neighbourhood centre, community facilities and primary school. The quality of the existing woodland, its ecological value, the natural and undulating topography and watercourses are key design drivers in this area and must be fully respected and integrated in designing and structuring the layout of future proposals.

Niddry Castle Bing

The potential development of Niddry Castle Bing should always be an aspiration. The demand for the bing blaes material is, however, unpredictable although a significant proportion is due for removal as part of the current M74 extension. Nevertheless, the Bing area has significant potential for development and may be appropriate for a number of uses, including residential and commercial. While there are no guarantees when it will become available, the principle of development should be accepted as part of the long-term regeneration and re-use of a major brownfield site. Its development can be readily “stitched” into the urban structure and landscape framework proposed within this Masterplan as a “seamless” extension of the adjacent residential neighbourhood.

South Winchburgh

Land to the south of the existing village – including that around the cemetery and the Union Canal could be considered as a potential housing location that could be integrated with the existing urban area through new links to the existing road network, along the Canal and around the existing Community Education Centre. Should it be taken forward for development, the key urban design drivers include: (1) integration with, and respect for, the Union Canal and Niddry Burn; (2) links into the existing village; (3) the undulating topography and setting of the Greendykes Bing (as a Scheduled Ancient Monument) and Niddry Castle; and (4) the relocation of the sewage treatment works.

Faucheldean

At Faucheldean, the opportunity potentially exists to create a careful expansion of the existing cluster of houses around a new community open space or “green”. Should this development occur in this location, it must be designed to integrate into its rural character.

9.10 Landscape Management and Maintenance

The decision as to how the landscape framework will be maintained and managed will be made by **Regenco** in consultation with West Lothian Council at some point in the future and is likely to be a subject of the Section 75 Agreement. The BAA is likely to require specific maintenance and management regimes in relation to bird control and the SUDs and these will be developed as part of detailed maintenance and management plans that will be developed at a later stage.

There are a number of different mechanisms that might be used to manage and implement the maintenance and management plan and there is also a wide variety of elements that could be included in any management agreement. Consideration has been given to the scope that any mechanism may have and it has become apparent that the management of all the public landscape assets within the Winchburgh community, under a “Stewardship” scheme, could bring many benefits for the town. Stewardship mechanisms could include one or a combination of the following:

- A bespoke trust for Winchburgh;
- An agreement with public bodies such as WLC, Scottish Water or the Forestry Commission;
- A specially formed management company;
- A specially formed management and implementation company;
- An extension to the existing management and maintenance carried out by Hopetoun Estate;
- An organisation working in conjunction with Oatridge College or the New Deal Task Force; and/or
- Under the auspices of an existing company, such as the Greenbelt Group.

Some aspects of the landscape framework, such as the recreational areas associated with the High School, may be more readily managed by West Lothian Council, whilst others, such as the SUDs may be adopted and cared for by Scottish Water. The regional SUDS facilities have been designed to accord with the adoption requirements of Scottish Water. It is essential that the responsibility for each area is clearly defined.

It is considered that it would be beneficial to have as much of the ongoing maintenance and management of the landscape framework carried out by one body or a limited number of organisations with specialist experience for the following reasons:

- It would provide for consistency of approach and standards;
- One point of contact for the community;
- It would also have the advantage of freeing developers from the ‘chore’ of having to organise such works themselves; and
- Economies of scale.

It may also be beneficial to have some of the landscape works implemented by this body. This would be particularly relevant where they are general requirements of the whole development or part of it rather than being directly attributable to a particular developer’s area. It should be noted that where works are implemented by contractual arrangement they are likely to have defects liability and maintenance periods as part of these contracts.

Financial contributors to the maintenance and management of the landscape may include:

- West Lothian Council
- Lead Developer – **Regenco**
- Individual developers
- Forestry Commission (through grants)
- Scottish Natural Heritage (through grants)
- Individual members of the public (e.g. users of allotments)

It may be that some of the bodies do not ‘buy in’ to the Stewardship scheme until after it has become established or at a later date.

Monies to pay for the management and maintenance could be one or all of:

- One off contribution e.g. via Developers, householders – revenue would then be used to generate investment
- Regular annual contribution, Council, householders, allotment users
- Grant aid from the Forestry Commission for woodland management

It will not be possible to accurately establish the level of payment required to carry out the maintenance and management works until the detail of the proposals, the extent of the areas to be managed and the maintenance and management works are more accurately defined. It is envisaged that this may not be the case until after submission of further information to meet the ‘reserved matters’ and detailed planning applications.



**Representation to West Lothian Council Local Development Plan
Main Issues Report**

Housing Land and other matters

**Joint submission on behalf of Regenco Trading Limited
& Hopetoun Estate Trust / Aithrie Estates**



October 2014

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1 Introduction

1. PPCA Ltd and Peter PC Allan Ltd have been jointly instructed by Regenco Trading Ltd and Hopetoun Estate Trust / Aithrie Estates (RTL / HET) to make representations to the West Lothian Council Local Development Plan Main Issues Report that has been published for consultation purposes. The following Report sets out in detail the representations lodged in relation to housing land matters as set out in the Main Issues Report and relevant Background Papers.
2. This is supplemented by separate, but linked, representations made to site-specific issues such as land at South Winchburgh and should be read in conjunction with these representations.
3. The representations below have been generally ordered sequentially and relate to paragraph numbers and questions posed in the Main Issues Report document.

2 National Planning Framework 3 (NPF3)

4. The third National Planning Framework (NPF3) provides the statutory framework for Scotland's long-term spatial development. It sets out the Scottish Government's spatial development priorities for the next 20 years. Planning authorities are required to take the Framework into account when preparing Development Plans and it is a material consideration in the determination of planning applications.
5. NPF3 notes, at paragraph 2.5, that the Scottish Government wants to see a significant increase in house building in coming years to ensure housing requirements are met across the country. It notes the need for flexibility in housing delivery and that the planning system should focus its efforts particularly on areas where the greatest levels of change are expected and where there is pressure for development. West Lothian Council is one such area.
6. NPF3 notes that throughout Scotland, there will be a need to ensure a generous supply of housing land in sustainable places where people want to live, providing enough homes and supporting economic growth. Winchburgh is such a location as demonstrated by detailed assessment set out below.
7. It notes that housing requirements will continue to be at their most acute around Edinburgh, Perth and Aberdeen, requiring targeted action to better match demand for land with

infrastructure capacity. RTL is working collaboratively with West Lothian Council and other third parties to ensure that delivery of housing and associated uses at Winchburgh is not held up by infrastructure requirements.

8. NPF3 notes that more ambitious and imaginative planning will be needed to meet requirements for a generous and effective supply of land for housing in a sustainable way. The Scottish Government specifically wishes to see a greater and more concerted effort to deliver a generous supply of housing land in the SESplan Strategic Development Plan area. A Key Action for NPF3 is to support housing development and the Scottish Government will work with housing providers and the development sector to achieve this. That approach is endorsed and promoted through this representation.
9. NPF3 confirms the Scottish Government's central purpose to create a more successful country, with opportunities for all to flourish, through increasing sustainable economic growth. To achieve this, the Government Economic Strategy aims to share the benefits of growth by encouraging economic activity and investment across all of Scotland's communities, whilst protecting natural and cultural assets.
10. In terms of the vision for Scotland, NPF3 confirms that this includes a vision where Scotland is a successful, sustainable place with a growing economy which provides opportunities that are more fairly distributed between, and within, all communities. The objective is to provide high quality, vibrant and sustainable places with enough good quality homes. This is endorsed and promoted as part of the ongoing strategic expansion of Winchburgh.
11. NPF3 explains that Scotland's seven city regions will continue to be a focus for investment, and the spatial strategy provides a growth and development agenda for each of the city regions.

3 Scottish Planning Policy

12. Scottish Planning Policy, published in 2014, set out national planning policies which reflect Scottish Ministers' priorities for operation of the planning system and for the development and use of land in Scotland. In line with NPF3 it promotes sustainable economic growth and a presumption in favour of development that contributes to sustainable development.

13. It notes that –

“By locating the right development in the right place, planning can provide opportunities for people to make sustainable choices and improve their quality of life. Well-planned places promote well-being, a sense of identity and pride, and greater opportunities for social interaction. Planning therefore has an important role in promoting strong, resilient and inclusive communities. Delivering high-quality buildings, infrastructure and spaces in the right locations helps provide choice over where to live and style of home, choice as to how to access amenities and services and choice to live more active, engaged, independent and healthy lifestyles.”

14. The strategic expansion of Winchburgh, the successful delivery of the first phases of development there and the ongoing interest and demand for more land from the development industry clearly demonstrate that this is the right type of development in the right location.

15. Scottish Planning Policy paragraph 28 states that the planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term. Development Plan policy should give due weight to net economic benefit, support good design and make efficient use of land, buildings and infrastructure. It should also support regeneration, the delivery of accessible housing, business, retailing and leisure development and infrastructure e.g. education and transport. It should improve health and well-being by offering opportunities for social interaction and physical activity and protect, enhance and promote the natural and built environment.

16. The principle of additional development land at Winchburgh complies with the above requirements in full.

17. Scottish Planning Policy paragraph 30 states that Development Plans should positively seek opportunities to meet the development needs of the plan area in a way which is flexible enough to adapt to changing circumstances over time and set out a spatial strategy which is both sustainable and deliverable, providing confidence to stakeholders that the outcomes can be achieved.
18. Allocation of additional land at Winchburgh will achieve the flexibility desired by Scottish Planning Policy and is wholly deliverable.
19. Both the NPF3 and Scottish Planning Policy endorse the need for planning to take every opportunity to create high quality places by taking a design-led approach. This is supported by RTL and put into practice at Winchburgh. Development at Winchburgh has, and would, take a holistic approach that responds to place whilst balancing cost and benefit of development over time.
20. RTL / HET endorse the Scottish Planning Policy requirement that planning should direct development to the right place. Development at Winchburgh both uses existing resources and creates new ones with the capacity to expand. It will co-ordinate housing with other forms of development, open space and infrastructure. It will use land adjacent to the existing settlement to tie that development in to the settlement itself. Additional land for development at Winchburgh will have significant and ongoing benefit for the amenity of local people and the vitality of the local economy. As an example, it will help deliver new schools, a town centre and rail station for the settlement. Feedback from existing businesses shows that the additional population growth seen from only the first phase of completed and occupied development has benefitted their individual business interests.
21. In relation to new housing development, Scottish Planning Policy notes that NPF3 aims to facilitate new housing development. House building makes an important contribution to the economy and planning can help to address the challenges facing the housing sector by providing a positive and flexible approach to development. In particular, provision for new homes should be made in areas where economic investment is planned.
22. Scottish Planning Policy paragraph 110 notes that the planning system should identify a generous supply of land for each housing market area within the plan area to support the achievement of the housing land requirement across all tenures, maintaining at least a 5-year supply of effective housing land at all times. It should enable provision of a range of attractive, well-designed, energy efficient, good quality housing, contributing to the creation

of successful and sustainable places, and have a sharp focus on the delivery of allocated sites embedded in action programmes, informed by strong engagement with stakeholders.

23. The Scottish Planning Policy makes an important distinction here between the identification of a generous (+10-20%) supply of land for development and the need to maintain at least a 5 year housing land supply at all times. Scottish Planning Policy allows for West Lothian Council to over allocate land for development. As noted below, this will be necessary, subject to certain caveats, to address the current significant failure in housing land supply.
24. Paragraph 119 notes that 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. Paragraph 122 notes that Local Development Plans should allocate appropriate sites to support the creation of sustainable mixed communities and successful places and help to ensure the continued delivery of new housing.
25. The Strategic Development Plan period runs from 2009 to 2024 and then on to 2032. As such, we are significantly through the first ten year period of that Plan. If, as anticipated the West Lothian Council Local Development Plan is adopted in 2016 that leaves only three years of the first ten year period remaining thus reinforcing the need to front load and over allocate land to ensure delivery of housing in the short term to meet Strategic Development Plan requirements.
26. Within this submission, and in line with Scottish Planning Policy above, priority is given to the identification of land capable of delivering housing product within ten years of Local Development Plan adoption. Given that the Local Development Plan will not be formally adopted until 2016, short term housing delivery would take place in the first five year period of that Plan i.e. 2016-2021. Medium term delivery will take place in the second five year period of the Plan (2021-2026) and longer term delivery will take place post 2026 beyond which the Local Development Plan requires to give an indication of future growth.
27. Winchburgh is one such location where additional land can be brought forward in the short, medium and long term to deliver housing completions that will meet requirements and address, in part, the housing land supply shortfall. The expanded Winchburgh will be a wholly sustainable settlement offering a full range and choice of facilities and community

uses. The issue of land supply and 5 year requirements is dealt with in detail by this submission below.

4 Strategic Development Plan

28. The SESplan Strategic Development Plan was approved with modifications by the Scottish Government in June 2013. Supplementary Guidance on Housing Land was approved with modifications by the Scottish Government in June 2014. Together, this sets the strategic framework for land use planning in the period to 2032.
29. The foreword of the Plan states that it sets out a spatial strategy which recognises existing development commitments and promotes a sustainable pattern of growth. The strategy is supported by a framework for delivery which will promote and secure economic growth and the delivery of housing in the most sustainable locations; and promote the development of strategic transport and infrastructure networks to support that growth and to meet the needs of communities.
30. This is supplemented by the Plan Vision which states that, by 2032, the Edinburgh City Region will be a healthier, more prosperous and sustainable place which continues to be internationally recognised as an outstanding area in which to live, work and do business and a Spatial Strategy that seeks to build on existing committed development, focusing further development along preferred corridors optimising connectivity and access to services and jobs. West Lothian Council is both a Sub-Regional Area and one of thirteen Strategic Development Areas acting as the primary locations for growth and investment and focus for further development. The Plan notes that new development proposals will complement and not undermine the delivery of existing committed development. The Plan Spatial Strategy aims to encourage key development sectors and promote a sustainable growth pattern.
31. The Plan notes that the Scottish Government has set out that its central purpose is to increase sustainable economic growth, with the Strategic Development Plan taking a more pro-active role. It notes that while the recent economic downturn has affected delivery of and demand for housing, it is particularly important in supporting economic growth and recovery to ensure that sufficient land is allocated and available for housing development in the period up to 2024.
32. It notes that there is a significant amount of land currently allocated or with planning permission across the SESplan area. The extent to which those sites remain capable of delivering house completions by 2024 will be re-assessed in LDPs. Where necessary,

alternative sites will be allocated, and a five year effective housing land supply will be maintained at all times to ensure that delivery is not unnecessarily constrained. Allocating sufficient land and maintaining a five years' effective housing land supply at all times will assist in increasing the delivery of new housing as soon as restrictions ease. In terms of infrastructure, Local Development Plans should make provision for the priority strategic interventions and identify additional local projects that will be necessary to facilitate the Strategic Development Plan. Investment in existing and new infrastructure at the right time and in the right locations is a vital component of delivering sustainable economic growth.

33. This approach is wholly supported by RTL / HET and considered necessary in light of maintenance of a five year housing land supply as set out below. Allocation of sufficient land to maintain at least a five year supply at all times is a Scottish Government requirement as noted above.

34. The Plan notes infrastructure issues associated with new development in West Lothian including transport and education. RTL is working with the Council to deliver a new rail station at Winchburgh as well as nursery, primary and secondary education to accommodate growth. It notes that new housing allocations could be directed towards existing committed developments if it can be demonstrated that they can contribute towards the housing requirement within the specified time periods. Winchburgh can accommodate and deliver short, medium and long term growth over and above that committed development that is the subject of planning permission using the model detailed below.

35. The Plan sets overall housing land requirements and, through Policy 5, uses Supplementary Guidance to establish the spatial split of that between the six constituent planning authorities. In the period to 2019, West Lothian Council is expected to identify land capable of delivering 11,420 dwellings. Policy 5 notes that Local Development Plans will allocate sufficient land which is capable of becoming effective and delivering the scale of the housing requirements for each period, which will be confirmed in the Supplementary Guidance.

36. Strategic Development Plan paragraph 115 states that –

“Scottish Planning Policy confirms that allocating a generous supply of land for housing in the Development Plan will give the flexibility necessary for the continued delivery of new housing, even if unpredictable changes to the effective land supply occur during the life of the plan. Maintaining a supply of effective land for at least 5 years at all times should ensure that there is a continuing generous

supply of land for house building. In this context, it would not be appropriate, in the absence of any other constraints, to prevent the earlier development of any sites which are allocated for construction to start after 2019. Doing that could result in the unnecessary release of less suitable sites instead.”

37. This is confirmed by Strategic Development Plan Policy 6. In that context, and based on the details set out below, it is wholly acceptable for West Lothian Council to concentrate the allocation of additional land at Winchburgh for the short, medium and long term delivery of housing completions that would assist in the maintenance of a five year housing land supply as required by Scottish Planning Policy and the Strategic Development Plan.

38. In relation to the maintenance of a five year housing land supply, Strategic Development Plan Policy 7 goes on to state that –

Sites for greenfield housing development proposals either within or outwith the identified Strategic Development Areas may be allocated in Local Development Plans or granted planning permission to maintain a five years’ effective housing land supply, subject to satisfying each of 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; and

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

39. Land identified at Winchburgh would be Development Plan led, of a scale necessary to enable short, medium and long term delivery of housing completions and in keeping with the character of the settlement. There is no Green Belt in West Lothian. Any additional infrastructure required as a result of the development would be committed or funded by the developer. This strategy, therefore, complies with Strategic Development Plan requirements set out above.

40. The Supplementary Guidance to the Strategic Development Plan on Housing Land provides further details in relation to Plan Policy 5 – Housing Land in relation to the distribution of housing land requirements by Local Authority within the Plan area.

41. It confirms that the total housing requirement 2009-2024 is 107,545 units with 74,835 units required to 2019 and that, to 2019, the West Lothian Council requirement is 11,420 units.
42. It states that most of the new housing requirement is expected to come forward on land already allocated for that purpose or with planning permission. The Plan also indicates that the new allocations required for the area could be directed towards existing committed developments if it can be demonstrated that they can contribute towards the housing requirement within the specified time periods. Winchburgh, as a committed development within a Core Development Area can deliver additional housing completions in the short – medium term over and above current delivery projections as outlined below.
43. At a 2012 base, it is expected that Local Development Plans will have to identify land to accommodate at least an additional 24,338 units. Table 3.2 of the Guidance notes that, for West Lothian as a whole, this translates into a requirement for additional land to accommodate, as a minimum, 2,130 units.
44. The Guidance refers to delivery and the need to maintain a five year housing land supply at all times. As a point of clarification, and in line with Scottish Planning Policy, this is a minimum requirement. The Council is within its rights to over allocate land that is deliverable to meet more than five years requirements. The issue of five year land supply is dealt with in detail below.

5 Local Development Plan Main Issues Report

Main Issues Report Introduction

45. RTL / HET support the need to direct development to the right locations as set out in the Main Issues Report Introduction. Winchburgh, as a strategic growth area that is demonstrably delivering housing and other community and infrastructure development, is one such location where the Council must take the opportunity to build on this success.
46. Representation is lodged to paragraph 1.28 of the Main Issues Report in relation to supporting documentation. The Proposed Plan must be updated to take account of National Planning Framework 3 and Scottish Planning Policy (published in 2014) and, particularly the need to promote sustainable economic growth and a presumption in favour of development that contributes to sustainable development.

47. RTL / HET generally support the Main Issues identified in Figure 4 and the Council Priorities set out in Figure 5 of the Main Issues Report subject to the identification of land to meet development requirements in full. There are no significant environmental or other external land use planning factors that would prevent West Lothian Council from meeting in full or exceeding its development requirements within the Local Authority area.

Main Issues Report Vision, Aims and Spatial Strategy for West Lothian

48. In response to Main Issues Report Questions 1 and 2 on the Vision for West Lothian, the following change is proposed – replace the second and third sentences with –

“It will be better connected by road and public transport and will have a full range and choice of housing, education, community, health, retail, recreation and leisure facilities and a network of green spaces to meet the needs of its growing population. Development requirements will be met in full and will take place in a sustainable way that protects and improves the area’s built and natural heritage assets, meets the challenges of climate change and renewable energy and helps regenerate deprived areas and improves the quality of life for people living in West Lothian.”

49. RTL / HET support the reference to the need for a generous supply of housing land to be identified in the Council area in paragraph 2 of the Main Issues Report. The Council must meet its housing need in full, addressing both unmet backlog and future requirements. This will require the identification of land over and above that shown as “preferred” in the Main Issues Report.

50. With regards to paragraphs 2.4-2.7 on page 12 of the Main Issues Report, to meet development requirements in full will require commitment to the delivery of new infrastructure in phase with development as is the case with the expanding Winchburgh settlement. A joined up approach involving developers, landowners, the Council and other third parties starting now will enable the delivery of land in a more efficient and timeous manner. Early, focussed engagement is essential if the Council is to meet development requirements in full.

51. RTL / HET support the need to deliver housing in sustainable locations. The ongoing strategic expansion of Winchburgh fully complies with this and will deliver strategic transport

improvements to road and rail. It is logical that Winchburgh continues to be a focus for strategic sustainable development.

52. In response to Questions 3 and 4 of the Main Issues Report in relation to the Council Main Issues, it is considered that a more proactive and positive stance should be adopted by West Lothian Council. As such the following changes are proposed –

- Main Issue 1 – replace the word “adequate” with “full”.
- Main Issue 3 – replace the first Aim with “Provide a generous supply of housing land to meet development requirements in full and provide for a minimum effective five year housing land supply at all times”
- Main Issue 4 – replace Aim with “Ensure that infrastructure and facilities are provided in phase with development to support population and economic growth and where appropriate, secure contributions from developers, landowners and other third parties, including the Council where appropriate, towards such provision”.

53. In terms of the Local Development Plan Main Issues Report Spatial Strategy, RTL / HET fully supports the Council ongoing priority to directing development towards existing Core Development Areas. Winchburgh, as one such area, has the capacity to accommodate additional growth in the short, medium and long term as set out below and should be highlighted as such. The further sustainable expansion of Winchburgh will reduce the need to travel, prioritises sustainable transport modes and will make a significant contribution to meeting Council affordable housing requirements.

54. In response to Main Issues Report Question 5, RTL / HET fully supports the flexible approach to acceptable uses on employment land and as set out in Main Issues Report paragraph 3.22. Uses listed within that paragraph that are outwith Use Classes 4, 5 and 6 are still major employment generators and should be positively encouraged to locate within the West Lothian Council area, especially within areas that have good communication and transportation links e.g. at motorway junctions.

Main Issue 3 – Housing Growth, Delivery & Sustainable Housing Locations

55. In terms of housing growth, delivery and location, the Local Development Plan must meet its housing land requirement in full, both in terms of backlog need and Strategic Development Plan additional land requirements. Support is given to the continuing prioritisation of Core Development Areas within the Main Issues Report and Winchburgh, as one such area, is

clearly delivering upon its housing and wider strategic development requirements. Additional development allocations at Winchburgh are fully compliant with housing requirements set out in National Planning Framework 3, Scottish Planning Policy and the Strategic Development Plan.

56. Additional infrastructure directly associated with such development on land in the control of RTL would, in line with national policy and the Strategic Development Plan be provided in phase with such development.
57. With respect to Main Issues Report paragraph 3.43 the market demand for housing at Winchburgh, demonstrated both in the rate of development that has occurred since circa October 2012 and the interest in the acquisition of additional land by house builders shows that there is capacity within the construction industry to deliver over and above existing allocations in the settlement.
58. RTL is progressing discussions with the Council on strategic infrastructure delivery necessary for the wider settlement at this time. This includes the delivery of education facilities referred to in Main Issues Report paragraph 3.44. RTL / HET support in full the need to accelerate development delivery in Core Development Areas. The identification of appropriate further land at Winchburgh for residential development delivery in the short term, a set out below, will encourage and, in part fund, the early delivery of such infrastructure.
59. To clarify the position in paragraph 3.46, the new Housing Need & Demand Analysis under preparation will inform SESplan 2 as the replacement for the current Strategic Development Plan. This emerging Local Development Plan must be consistent with current Strategic Development Plan housing land requirements.
60. With regard to paragraphs 3.52 – 3.54, the Local Development Plan must maintain a minimum five year housing land supply at all times. From the details below, West Lothian Council is failing to do so at this time. The only viable solution, as set out below, is for the Council to significantly over allocate land capable of delivering housing development within the short term to remedy its housing land supply failure. Only by introducing this level of generosity in the supply will the land supply failure be resolved.
61. In response to Main Issues Report Question 15, RTL / HET proposes that the Council adopts Scenario 3 to meet its housing land requirements plus additional deliverable development sites that will meet a significant proportion of the 4,371 housing land supply shortfall detailed below. This proactive approach will demonstrate a commitment from the

Council to deal with its significant five year housing land supply problem in the short-medium term and would deliver Scottish Planning Policy and Development Plan compliant sites to meet housing requirements for a range and choice of housing types and tenures. The significant benefits to the Council in this approach would be the delivery of housing to meet requirements, additional contributions to infrastructure requirements and additional affordable housing delivered.

62. In response to Questions 20 and 22, a proactive approach must be taken to the prospect of delivery from existing housing allocations set out in the adopted Local Plan. This will, and should, result in housing site deletion and reprogramming. However, as set out below, this requires to go further than proposed in the Main Issues Report preferred approach to take a realistic approach to the prospect of delivery of housing development from larger sites such as Westfield and East Broxburn. Only this approach will allow sites that can deliver in the short – medium term, thereby addressing the housing land supply failure, to come forward.
63. Representation is raised to paragraph 3.74 of the Main Issues Report. RTL is working with the Council and other third parties to ensure the delivery of infrastructure necessary to enable the long term strategic expansion of Winchburgh. RTL is fully committed to this process but is also well aware that the final solution will require commitment from all parties involved including the Council.
64. Representation is raised to paragraph 3.75 of the Main Issues Report. In order to maintain a five year land supply, provide additional upfront funding for infrastructure such as schools and deliver affordable housing land release cannot be restricted to post 2024. Additional land release over and above the 400 units and preferred site identified in the Main Issues Report must take place at Winchburgh in the short and medium terms. Representation to the non-allocation of land at Winchburgh to this effect is made separately. The land in question is wholly deliverable in the short-medium term. Demand for additional land at Winchburgh from the house building industry is high and the Council stance on throttling land release there as set out in this paragraph of the Main Issues Report is frustrating delivery.
65. It is important to clarify that any additional land would be brought forward in parallel with the delivery of the strategic expansion of Winchburgh that has planning permission and not in place of it. The demand for residential development land at Winchburgh is such that there is no question over deliverability of land to the south of the settlement in conjunction with development elsewhere.

66. As such, in response to Questions 23 – 25 of the Main Issues Report, RTL / HET supports an alternative approach to development delivery at Winchburgh to that proposed that requires short term delivery of housing completions on land over and above that identified in the Main Issues Report for reasons of housing land supply and infrastructure delivery.
67. With respect to paragraph 3.88 of the Main Issues Report, the issue of spare capacity at Linlithgow Academy requires to be fully resolved to ensure that housing delivery is not unnecessarily constrained. This matter has been the subject of detailed deliberation in recent planning appeals to the Scottish Government for residential development in the Linlithgow area and beyond. It is imperative that the Council, as Education Authority, is clear on available schools capacity across the entire Local Authority area now.
68. In response to Question 29 of the Main Issues Report, RTL / HET has no objection to the principle of development at Linlithgow but this must be managed in the context of committed development at Winchburgh, the phasing and delivery of secondary school education at Winchburgh and the environmental capacity of Linlithgow to accommodate further growth.
69. In response to Question 35, RTL / HET supports a revision to the Council affordable housing policy to bring it up to date with revised Scottish Planning Policy on the subject. The delivery of affordable housing can take a variety of forms but affordable housing is, often, one of a number of considerations in site delivery. A flexible approach must be adopted to allow delivery of the 25% requirement whilst, at the same time, maintaining development viability.

Main Issue 4 – Infrastructure Requirements and Delivery

70. RTL / HET recognise the importance of infrastructure delivery in phase with development. RTL / HET support the commitment in paragraph 3.110 of the Main Issues Report to the need for joint working between the private and public sector to deliver infrastructure requirements. This is working in practice in the delivery of the Winchburgh strategic expansion. All parties must continue to explore all available funding mechanisms for infrastructure such as schools and roads to ensure the efficient delivery of housing. This must include involvement of third parties such as the Scottish Government and opportunities provided by wider European funding initiatives. RTL / HET generally support the Council preferred approach to delivery in this context in answer to Main Issues Report Questions 38 – 41.
71. RTL / HET supports the Council stance as set out in paragraph 3.135 of the Main Issues Report in relation to the preference to locate new development in close proximity to existing or proposed public transport facilities e.g. a new Winchburgh rail station. RTL / HET also

support the Council priority given to measures that help to increase transport efficiency and reduce dependency on the private car. Only where necessary should local roads capacity be expanded. RTL / HET support the priority given to directing development to areas well served or capable of being served by public transport (paragraph 3.143). RTL / HET fully support the Council ongoing commitment to the delivery of a new rail station at Winchburgh.

72. In this context, Winchburgh is on existing strategic bus routes and will, through its strategic expansion, deliver a new rail station and park and choose facilities. As such, Winchburgh should be prioritised for additional housing and other development through the emerging Local Development Plan in the short – medium term.

73. In response to Question 42, RTL / HET supports the Council preferred approach to promoting access to / within West Lothian. In response to Question 43, RTL / HET fully supports the provision of a new rail station at Winchburgh.

74. In response to Question 45 of the Main Issues Report in relation to town centres and retailing, RTL / HET fully support the Council commitment to facilitate a new town centre at Winchburgh. This, in time, should be granted town centre status through future Local Development Plans.

75. In response to Questions 48 – 53, RTL / HET wishes to make representation to the current Countryside Belt designated between Winchburgh and East Broxburn. Winchburgh has potential to expand to the south of the village without adversely affecting the landscape setting of the settlement or, following a necessary review of the East Broxburn portion of the wider Core Development Area allocations as set out in a separate Report, resulting in any form of coalescence with East Broxburn. Representation is lodged to the boundaries of the Countryside Belt between Winchburgh and East Broxburn as shown in the Main Issues Report Winchburgh map and the non allocation of land for mixed use development to the south of the village to that effect. The details of this are set out in a separate representation Report. The two settlements would remain discrete and separated by a wider Countryside Belt area as a result of the changes proposed by this representation.

76. With regard to Main Issues Report Questions 80 – 82 and paragraph 3.212, representation is lodged to the assertion made in the Main Issues Report that no further land be brought forward for development adjacent to the Union Canal between Winchburgh and East Broxburn. As noted above, and in separate representation, there is capacity for Winchburgh to expand to the south to accommodate mixed use development in the vicinity of the rail line and Canal with no significant net detrimental effect on setting of the Canal, rail line or

settlement. The Canal already has an urban / rural edge to it as it passes through Winchburgh and, will have even more so if East Broxburn Core Development Area proposals come forward. Representation is lodged to the non-allocation of this land for mixed use development capable of delivering housing completions and other uses in the short – medium term.

77. In relation to the Main Issues Report Section on emerging Supplementary Guidance, RTL / HET supports the production of Supplementary Guidance in relation to the new non-denominational secondary school required at Winchburgh.

6 Local Development Plan Main Issues Report Settlement Statements

78. Representation is lodged to the scale and programming indicated in the Local Development Plan Main Issues Report (both text and maps) of the East Broxburn portion of the wider Core Development Area. The boundary should be adjusted as per the separate representation lodged in the subject, housing numbers adjusted downwards, as indicated in the latest masterplan submitted on behalf of the landowners and housing completion rates reprogrammed to reflect issues associated with delivery of the land in question. There is little prospect of East Broxburn delivering strategic scale housing completion rates before 2021 (see later). This delivery failure pre 2021 should be redirected to Winchburgh and land allocated that is capable of short term housing completions as part of wider mixed use development.

79. Representation is lodged to the continued identification of land at Westfield for 550 residential units. There is little prospect of residential development coming forward at Westfield. There has been no development interest expressed in the site and there are significant pre-development commencement works required and outstanding as set out in planning conditions. As currently committed development this site is restricting access to Linlithgow Academy for sites such as that at Winchburgh by reserving capacity that will not be taken up in the short-medium term. This site should be fundamentally reprogrammed to only come forward post 2021 and the balance of housing development in that period transferred to Winchburgh.

80. The issue above is simply one of timing and the need to redistribute housing land to areas where short – medium term completions are deliverable in line with Scottish Planning Policy. RTL / HET recognises the strategic relationship between Winchburgh and East Broxburn and the role that the expansion of East Broxburn will play in wider regeneration initiatives e.g. the former Candleworks site in the settlement. However, delivery of housing product

here will not take place for a number of years thus creating a gap in housing supply and the funding of wider infrastructure. The reprogramming of housing completions and redistribution of short term housing to Winchburgh will address these issues whilst maintaining the strategic expansion opportunity for East Broxburn established through the last Structure Plan and adopted Local Plan and carried forward in the Strategic Development Plan and emerging Local Development Plan.

7 Housing: Local Development Plan: background paper

81. Representation is lodged to the Background Paper as currently written as it refers to the requirements of National Planning Framework 2 and Scottish Planning Policy of 2010. This must be updated to reflect NPF3 referred to above and Scottish Planning Policy of June 2014. It is noted that this may require significant rewriting of the Paper given the directions included in the updated Scottish Government documentation including the presumption in favour of sustainable development and the fact that these latest documents take account of letters written by the former Chief Planner referred to in the Background Paper.
82. In that context, representation is lodged to paragraph 2.15 of the Background Paper that refers to the Chief Planner letter of March 2011 and the “current economic climate”. This is not a consideration in the need to maintain a minimum five year land supply at all times or provide a generous housing land supply through the Development Plan process set out in Scottish Planning Policy of 2014. All references to this should be removed from both this Paper (e.g. paragraphs 2.26, 2.32 and 2.65) and the Local Development Plan itself. The figures shown for site programming should also be unaffected by economic climate whilst, at the same time, be realistic. West Lothian Council must take a positive stance on meeting development requirements in full for the Local Development Plan period under consideration and particularly at Winchburgh which has an established track record of delivery.
83. Representation is lodged to the fact that the Background Paper would appear to make no reference to the Council affordable housing building programme agreed in 2014 that will deliver affordable housing on Council sites over the next two years.
84. Representation is lodged to paragraph 2.61 of the Background Paper in relation to comments on delivery from Core Development Areas. There have been over 100 unit completions and almost 70 occupations from only two house builders at the Winchburgh strategic expansion area alone since October 2012 i.e. in less than two years. This is nearly twice that originally expected through the Housing Land Audit process. There are four house builders on site now and that will increase to six within the next six months with demand for additional land parcels ongoing.

85. It is understood that land at Armadale was the single most successful site in the UK for a period of time for one of the national house builders on site there.
86. For the Background Paper to state that “the contributions made by the Core Development Areas thus far, has been insignificant” is, therefore, simply wrong.
87. Winchburgh, as a standalone settlement undergoing strategic expansion, can be considered to have its own geographically identifiable “housing market areas”. Land is being developed to the west of the settlement, within its central core area and to the north at this time. Each area is operating independently of others in terms of marketing and housing delivery and without conflict. The same argument can be advanced for the creation of a South Winchburgh Housing Market Area, thus overcoming any concerns arising over deliverability of land to the south of the settlement. This would, as with the above, operate independently of the other Housing Market Areas whilst, at the same time, contributing to the overall strategic growth of the settlement.
88. The Housing Land Audit base for the Background Paper also requires to be update to the latest agreed Housing Land Audit (2013) and, where possible 2014, especially in relation to housing completions which should have been quantified at 1st April 2014 survey date. Representation is lodged to paragraph 4.29 of the Background Paper where it is stated that “for the five year period from 2012 to 2017, the total number of houses forecast to be built in West Lothian was 3,418 (or an average of 684 houses per annum). This figure represents the level of output that the house building industry agreed was realistic from the existing established supply”. For the sake of clarity the Audit process is an assessment of known sites and likely supply. This does not mean that there is not capacity for additional land to come forward in the short term (outwith the Housing Land Audit process) to deliver completions to address the five year housing land supply shortfall detailed below.
89. Representation is lodged to the Background Paper where it refers to an “effective post 5 year housing land supply”. The effective housing land supply is defined in Scottish Planning Policy as “The part of the established housing land supply which is free or expected to be free of development constraints in the period under consideration and will therefore be available for the construction of housing”. It is important not to confuse the effective five year housing land supply and requirement from the wider established housing land supply. In five year housing land requirement terms, the effective supply is not the 14,281 units referred to in Background Paper paragraph 4.31.

90. Representation is lodged to Figure 16 as it refers to the former Structure Plan. This is out of date and has been superseded by the SESplan Strategic Development Plan. References to the former Structure Plan housing land requirement are irrelevant. An appropriate methodology for the calculation of the five year housing land requirement using the SESplan Strategic Development Plan (base date 2009) that has been agreed through the Scottish Government planning appeal process is set out below.
91. It is essential that the Background Paper is clear on the role of windfall and urban capacity sites in the housing land supply. Such sites can only be included in forward programming for Audit purposes once planning permission has been issued for such development.
92. RTL / HET supports the statement in the Background Paper in paragraph 4.66 that a new rail station at Winchburgh could assist in the delivery of more sustainable travel patterns in West Lothian. On that basis, additional short, medium and long term housing allocations should be made, over and above that proposed in the Local Development Plan Main Issues Report in the settlement. In that context, RTL supports the comments made in discussions between the Council and Homes for Scotland that there is a market along the M9 Corridor in settlements including Linlithgow, Livingston and Winchburgh.
93. The most up to date five year housing land supply situation is set out below.

8 Housing Land Position Statement (in the context of HLA 2013)

94. The Local Development Plan Housing background paper makes reference on page 31 to a Housing Land Supply Position Statement and states that this provides an update of land supply figures with reference to the HLA 2013.
95. Representation is lodged by RTL / HET to the contents of this Statement in relation to the most up to date housing land position in the West Lothian Council area.
96. The Statement is dated February 2014 and, therefore, pre-dates and takes no account of the approved Scottish Government Supplementary Guidance on Housing Land that accompanies the SESplan Strategic Development Plan or the content of the Ministerial Approval letter of June 2014. It takes no account of the requirements set out in Scottish Planning Policy or National Planning Framework 3 of June 2014 as detailed above.
97. Representation is lodged to the opening paragraph of the Introduction of the Statement which states that that planning authorities maintain a five year effective supply of housing land at all times. Scottish Planning Policy of June 2014 requires that at least a five year

housing land supply be maintained at all times (paragraph 123). This allows the Council to over-allocate land for residential development purposes through the Local Development Plan process.

98. The scale of the housing land requirement for the West Lothian Council area has now been set out in the Strategic Development Plan Supplementary Guidance of June 2014. The Local Development Plan Main Issues Report was published for consultation in August 2014. The Statement is out of date and must be comprehensively updated as a result.
99. The Statement confirms the annual completions achieved and detailed through the Housing Land Audit process. Representation is lodged to paragraph 2 of page 3 of the Statement where it states that the incorporation of sites to meet the requirements of the Supplementary Guidance will significantly increase programmed completion figures.
100. This statement is false as the sites allocated through the emerging Local Development Plan will not be confirmed until Local Development Plan adoption with lead in times anticipated beyond that before housing completions occur.
101. Certain existing strategic housing sites, subject of separate representation, that the Local Development Plan expects to deliver housing output in the short to medium term, either have no planning permission at this time or are non-effective. The Council cannot rely on additions to such sites e.g. East Broxburn to deliver housing product in the short to medium term.
102. Lastly, in relation to this point, housing programming is dynamic with new sites coming forward replacing sites that are completed over time. For any significant increase in housing completions to occur, the Council must over-allocate land to meet requirements.
103. Representation is lodged to the text below Table 2 of the Statement. It must be made clear that the effective five year housing land supply for Housing Land Audit purposes is 3,635 units. There is no prospect of delivering 14,470 units in the same period. The issues of the differences between land supply and the Audit process, the need to maintain a minimum five year housing land supply at all times and phasing are set out in detail below.
104. Representation is lodged to the reference to the Seafield Road planning appeal as this has, again, been overtaken by subsequent appeal decisions and is, in any case, not necessarily representative of the housing land position in the West Lothian Council area at October 2014.

9 Five year housing land supply and phasing

105. The identification of land capable of accommodating development is one part of the delivery of land for housing in the West Lothian Council area and is dealt with through the Development Plan process. The need to maintain a minimum five year housing land supply at all times is another. 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.”

106. This allows West Lothian Council, as planning authority, to actively address the issue of sites that have no prospect of bringing forward housing development through the Local Development Plan review process through adjustment to allocations and / or reprogramming of completions. This allows for allocations with no prospect of delivery to be deleted.

107. Strategic Development Plan Policy 6 requires that –

“Each planning authority in the SESplan area shall maintain a five years’ effective housing land supply at all times. The scale of this supply shall derive from the housing requirements for each Local Development Plan area identified through the supplementary guidance provided for by Policy 5. For this purpose planning authorities may grant planning permission for the earlier development of sites which are allocated or phased for a later period in the Local Development Plan.”

108. The Scottish Government approval of the Strategic Development Plan Supplementary Guidance on Housing Land in June 2014 included a modification to remove the second sentence of paragraph 3.13 of that document. This, in effect, requires the Strategic Development Plan to maintain a five year housing land supply at all times in line with

Scottish Planning Policy above and, from that, the need for Local Development Plans to identify sufficient land, both in numerical and phasing terms, to meet requirements.

109. West Lothian Council is failing to comply with Scottish Planning Policy and the Strategic Development Plan at this time in relation to the maintenance of a five year housing land supply. The five year housing land supply requirement in the Council area has failed since circa 2009. This is demonstrated below for the period 2009 (the start of the Strategic Development Plan period) to 2013. This methodology has been agreed through the Scottish Government planning appeal process.

Strategic Development Plan requirement

SESPlan housing land requirement 2009-19	11,420 units
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(source: SESPlan Strategic Development Plan Supplementary Guidance 2014)

Calculating the effective housing land supply

Housing completions 2009-13	1,825
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Audit 5 year effective supply 2013-18	3,625
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Audit effective supply 2013-19	4,336
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<u>Council total supply 2009-19</u>	6,161
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(source: Housing Land Audit 2013)

Housing land requirement	11,420
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minus

Housing completions to date	1,825
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equals

Remaining requirement 2013-19	9,595
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divide by

Remaining Plan period (6 years)	1,599
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multiplied by

Five year effective supply requirement	7,996
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less

Five year forward programming	3,625
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equals

Shortfall in five year supply (2013-18)	4,371 units
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Percentage shortfall 2013-18	55%
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110. There is an ongoing failure to maintain a five year housing land supply in the West Lothian Council area. The failure to maintain a five year land supply will continue and get worse according to the projected housing completion rates set out in the latest agreed Housing Land Audit and the annual housing completion figure of only 615 units from draft Housing Land Audit 2014 for the year 2013-14.
111. This is due, in part, to the fact that there are certain large scale housing allocations identified by the current Local Plan that have not delivered housing product and, for various reasons such as marketability and land ownership are unlikely to do so in the period 2009-21. RTL / HET fully endorses the concern raised in paragraph 3.60 of the Local Development Plan that allocating additional land in itself will not guarantee additional housing delivery. Additional land that has a definite prospect of delivery in the short and medium term must be identified to meet the ongoing and worsening five year housing land supply problem. Land at Winchburgh meets this requirement.
112. There is no means of artificially accelerating housing land completions from committed sites in the West Lothian Council area at this time. The scale of the problem is so bad that even development “hotspots” such as Winchburgh cannot, alone, make up the shortfall.
113. It is neither possible nor appropriate to argue that emerging housing land supply through the preferred sites identified in the Main Issues Report will simply make up this shortfall as many such allocations are of a scale that require significant lead in, infrastructure dependent and / or time restricted. They are also too few in number. It is not likely that such sites will deliver housing completions until years 4 or 5 of the latest agreed Housing Land Audit at the time of consideration. Even should an additional 200 units be completed in that Audit year these would only replace completions that have occurred in earlier years on sites no longer in the Audit process. Housing land supply is a dynamic process that requires constant supply. There needs to be a short term over allocation of land to address immediate supply problems and further land for the subsequent five years.
114. Specifically in the context of draft Housing Land Audit 2014, representation is lodged to any inference that any part of the Winchburgh planning permission in principle area is constrained by marketability issues.
115. The only means of addressing this concern is a combined approach of reprogramming existing site delivery and identification of short term deliverable land that will produce housing completions within five years. Site reprogramming will also address the issue of education infrastructure capacity especially at Linlithgow Academy. This will free up capacity

that is reserved for housing sites with little or no prospect of coming forward in the short term but, due to new build schools infrastructure, can be accommodated in the longer term when, realistically, housing completions could be expected to start on such sites. This capacity can then be properly directed to accommodate short –medium term ongoing development and new short – medium term proposed development.

Westfield

116. There is little prospect of residential development coming forward at Westfield. This is an allocated site with full planning permission for 550 units, expiring in 2015, but noted as constrained in the West Lothian Council Housing Land Audit 2013 for marketing reasons. There has been no development interest expressed in the site and there are significant pre-development commencement works required and outstanding as set out in planning conditions. As currently committed development this site is restricting access to Linlithgow Academy for sites such as that at Winchburgh by reserving capacity that will not be taken up in the short-medium term. This site should be fundamentally reprogrammed to only come forward post 2021 and the balance of housing development transferred to Winchburgh.

East Broxburn

117. The East Broxburn portion of the wider Core Development Area, as identified by the previous Structure Plan, is the only strategic development location in West Lothian where there has been no planning permission issued or development commenced. East Broxburn has been in the public domain since 2001 when the last Structure Plan was first published for consultation. It was confirmed as an allocation on adoption by the Council of its current Local Plan in 2009 but was included in earlier draft versions of the Plan dating back to before 2004. There is little prospect of planning permission here in the short term and, from that, no prospect of residential development in the medium or, possibly long term. The East Broxburn allocation suffers from major environmental issues and requires significant infrastructure investment to allow development to come forward.

118. This point is reinforced by the Broxburn Community Council response, dated 1st July 2014, to the recent masterplan revision put forward for the allocated site at East Broxburn that actively reduces the expected housing output from the site. This letter raises serious and fundamental concerns over contamination and undermining in the vicinity of the proposed primary school, noise and ecological concerns, transport and infrastructure relating to the East Broxburn allocation. This supports the concerns raised previously by RTL / HET over the fundamental deliverability of this site at all.

119. Representation has been lodged, separately, to both the current boundary of the East Broxburn allocation and also the proposal to bring forward additional land here for development purposes when there is no prospect of development within the existing allocation and an overall reduction in housing numbers through the latest iteration of the masterplan produced for the site in early 2014.
120. The benefits of development in the East Broxburn portion of the wider Code Development Area to the wider area are recognised in terms of housing delivery, regeneration and community growth. However, it is considered essential that the Council fundamentally re-examines the delivery strategy and programming for East Broxburn in terms of infrastructure requirements and scale as part of this Local Development Plan process to avoid the continued identification of land for development that only makes up housing numbers and prevents housing delivery elsewhere.
121. A reprogrammed East Broxburn would have no net detriment for education provision either in that settlement or in Winchburgh. The only education contributions required by Winchburgh from East Broxburn relate to denominational secondary school requirements.
122. The short term loss of units at East Broxburn would be made up by an allocation at south Winchburgh. There would therefore be no loss of roof tax contribution to the new school and such contribution would be made sooner. Importantly, this would not increase housing numbers in a wider context but, instead, prevent a numerical worsening of the situation with actual housing delivery at south Winchburgh making up for a reduction in housing numbers on undeliverable land at East Broxburn.
123. It may also be possible as a result of such a move to re-prioritise certain infrastructure items at Winchburgh thus improving overall financial viability and deliverability for all involved.

Linlithgow

124. The Main Issues Report seeks to identify preferred sites for residential development in Linlithgow now that the Strategic Development Plan has removed the area of restraint restriction on the settlement. RTL / HET have no objection to the delivery of new residential development in Linlithgow in principle. However, the settlement has an environmental, community and infrastructure capacity that should not and / or cannot be breached given its historic significance. The contribution that Linlithgow may make to the overall additional housing requirement, whilst, important, is not significant in numerical terms. This is also

highly dependent on sufficient education provision being made available to accommodate development which is both complicated and time bound.

125. Outwith its own two year affordable housing programme, the Council has no reserve of land available to come forward to fill the short-medium term housing land gap that would improve the five year housing land requirement position.

Phasing

126. From the above, the proposed phasing of new housing development as set out in the Main Issues Report is unacceptable as this simply exacerbates the five year housing land supply situation.

127. An example of this is the restriction placed by the Main Issues Report on development over and above that currently consented at Winchburgh which prevents release of further land until beyond 2019. This must be removed.

128. Given the unparalleled success of Winchburgh in terms of housing completion rates with six house builders either on site, or due to commence development in the next six months, it is clearly a highly marketable and deliverable location. The delivery of major new strategic infrastructure, including new schools and a railway station, will only improve this situation.

129. Since October 2012 there have been over 100 dwellings completed by four national house builders, over 70 of which are occupied, with a further 40 under construction in any one month. There is no question of deliverability.

130. The settlement has clear environmental capacity to grow beyond the boundary that will be created by the development that currently has permission and is under construction. Housing developers that are currently onsite have enquired about further development plots and other national house builders are interested in establishing there. As such, there is no question of marketability and deliverability. There is no argument to be made against the fact that additional land identified for development at Winchburgh over and above that set out as preferred in the Main Issues Report could not come forward in the short-medium term.

131. The delivery of additional residential development in Winchburgh in the short term has significant benefits to the Council. It will slow down the annually increasing five year housing land supply deficit in the short term. It will make significant additional early contributions to

the provision of new infrastructure such as schools, thereby, reducing third party risk on delivery. It will create long term defensible boundaries for the settlement. It will cement Winchburgh as a sustainable settlement.

132. Land releases for development at Winchburgh thus far have resulted in fewer houses than either the most up to date masterplan or the Housing Land Audit projected or have programmed. As such, additional land release is required at Winchburgh just to maintain the status quo i.e. reach the 3,450 units originally envisaged by the Local Plan and necessary to meet supply requirements. If additional land is not identified at Winchburgh to meet this requirement then the housing land supply situation will only worsen.

133. Site programming is a fundamental requirement of the Local Development Plan preparation process to ensure a continuous supply of land deliverable in the short, medium and long term, as defined in paragraph 26 above, to comply with both five year housing land requirements and future housing land supply needs as set out in the Strategic Development Plan. For this purpose, land to the south of Winchburgh promoted through separate, but linked, representation should be programmed as follows –

Site EOI-0201 – short term (2016-21)

Site EOI-0202 – short term (2021-26)

Site EOI-0203 – medium term (2021-26)

Site EOI-0193 – medium term (2021-26)

Site EOI-0199 – medium – long term associated with depletion of Niddry Bing post 2025

Site EOI-0194 – long term (post 2026)

Site EOI-0200 – long term associated with depletion of Niddry Bing post 2025

10 Proposed Solution

134. The solution available to the Council, and endorsed through this representation, is for the further identification of Scottish Planning Policy / Strategic Development Plan compliant housing sites over and above allocations identified in the Main Issues Report.

135. It is suggested that the sites are identified using a Development Plan led approach. This should, as a minimum, allocate preferred and “reasonable alternative” sites identified in the Main Issues Report which, by Council admission, are generally Scottish Planning Policy and Strategic Development Plan compliant. Further land to the south of Winchburgh should also be identified for mixed use, including residential, development as part of this.

136. The scale and nature of these sites would comply with the national presumption in favour of sustainable economic development, not place significant strain on local infrastructure and deliver housing completions within the short term following Local Development Plan adoption – anticipated in 2016. This approach will “front load” housing completions in the short term thereby addressing the five year housing land supply shortfall, at least in part, identified above and remedying the wider housing supply problem in the Council area. It is the only realistic means by which housing completion rates will increase in the short term and the only way to slow down or stop the ongoing failure in five year housing land supply by the end of the first ten year period of the Strategic Development Plan. It will also provide medium-long term certainty to the Council, community, landowners and developers over future growth at Winchburgh.

137. From that, the restriction placed on the development of further land at Winchburgh until after 2019 must be removed. Furthermore, additional land of a scale that is deliverable in the short term must be identified at Winchburgh in line with the solution set out above to deliver housing completions in the short term. Additional allocations confirmed in the Local Development Plan would allow planning applications to come forward that could result in housing completions on these sites within the short, medium and longer term.

11 West Lothian place-based Green Networks: Local Development Plan: background paper

138. RTL / HET support the principle of the creation and protection of green networks throughout the West Lothian Council area. With regard to Winchburgh, it must be noted that the Union Canal is both an urban and rural man made structure. The Canal setting is a period of change at this time resultant from the strategic expansion of Winchburgh to the north with the proposed construction of a Canal basin, new bridges across it and an urban landscaped edge adjacent to it. The high quality mixed use development taking place to the north of the town as it affects the Canal could, and should, be replicated to the south as well.

139. The proposal put forward through the separate paper to this submission seeks to actively enhance the setting and function of the Canal between Winchburgh and East Broxburn. Pulling the proposed northern urban edge of the East Broxburn portion of the Core Development Area south towards the settlement and allowing for limited additional mixed use development to the south of Winchburgh has the following green network advantages –

- Creation of a wider area of open space between the two settlements than currently proposed

- A reduction in both actual and perceived coalescence between the two settlements
- The opportunity to create formal open space in the form of a Heritage Park style development recognising and celebrating the history of the two settlements that will ensure the permanency of that separation distance
- Creation of a high quality landscaped urban edge / transition zone to the Canal as it leaves Winchburgh heading south through master planned mixed use development of a scale appropriate both to the settlement as a whole and the immediate surrounding area south of it.

140. Overall, the net effect would be a positive impact on the Canal and surrounding area at this point. This must be taken into consideration in the finalisation of any green network requirements for the Union Canal as it leaves Winchburgh.

12 West Lothian Landscape Character Classification: Local Development Plan: background paper

141. This Background Paper requires to be updated to take account of the relevant requirements set out in the latest Scottish Planning Policy of 2014.

142. It is noted that there is no reference in this document to the ongoing landscape changes that are being, and will continue to be, brought about by the strategic expansion of Winchburgh that will affect Landscape Unit 22.

143. It is noted that, in relation to Landscape Unit 15, to the south of Winchburgh, there are no constraints upon the ability of that area to accommodate further appropriate scale mixed use development. The scale of surrounding Bings and the location adjacent to the urban edge of the settlement would minimise any impact of the scale proposed.

13 Conclusion

144. In conclusion, RTL / HET have made the representations outlined above to the West Lothian Council Local Development Plan Main Issues Report as published for public consultation purposes by the Council.

145. These seek to ensure the allocation and short, medium and long term delivery of land for housing to meet actual requirements and address the housing land supply shortfall in the Council area at this time. Winchburgh is prioritised for the identification of such land and sites to the south of the settlement have been identified separately to enable this to happen.

146. The Proposed Plan emerging from the Main Issues Report, as a priority must –

- Take full account of up to date Scottish Government requirements on housing land supply and maintenance of at least a five year housing land supply at all times
- Allocate sufficient land to address the ongoing current failure to maintain at least a five year housing land supply at all times.
- Re-programme the delivery of sites such as Westfield and East Broxburn to reflect accurate housing delivery expectations thus releasing infrastructure capacity in the short and medium terms for additional land to meet housing requirements at Winchburgh
- Allocate, as a minimum and in addition to the preferred site, Council site EOI-0201 for mixed use, including residential, development
- Adjust the boundary of the current East Broxburn portion of the wider Core Development Area to reflect deliverability and allocate additional land for mixed use development to the south of Winchburgh for mixed use development, including housing, which is the subject of separate representation that would deliver completions in the short, medium and long term.



Aithrie Estates and Hopetoun Estate Trust

West Lothian Local Development Plan Main Issues Report

Winchburgh

Representations - October 2014

- Sites:
- 0193
 - 0194
 - 0201
 - 0202
 - 0203



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contents

- Options
- Opportunities
- Site 0193
- Site 0194
- Site 0201
- Site 0202
- Site 0203
- Combined Sites
0201/0202/0203
- Combined situation
- Team



options

site 0193 – 22.7 hectares

- Net Development Area of 14 hectares
- Lower Rural densities – 300 homes

site 0194 – 11.5 hectares

- Net Development Area of 8.5 hectares
- Lower Rural Densities – 185 homes

site 0201 – 9.4 hectares

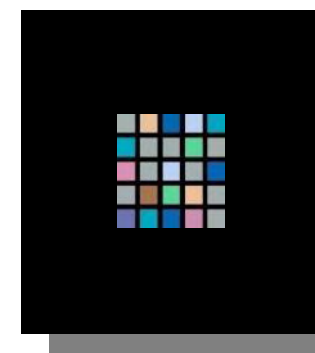
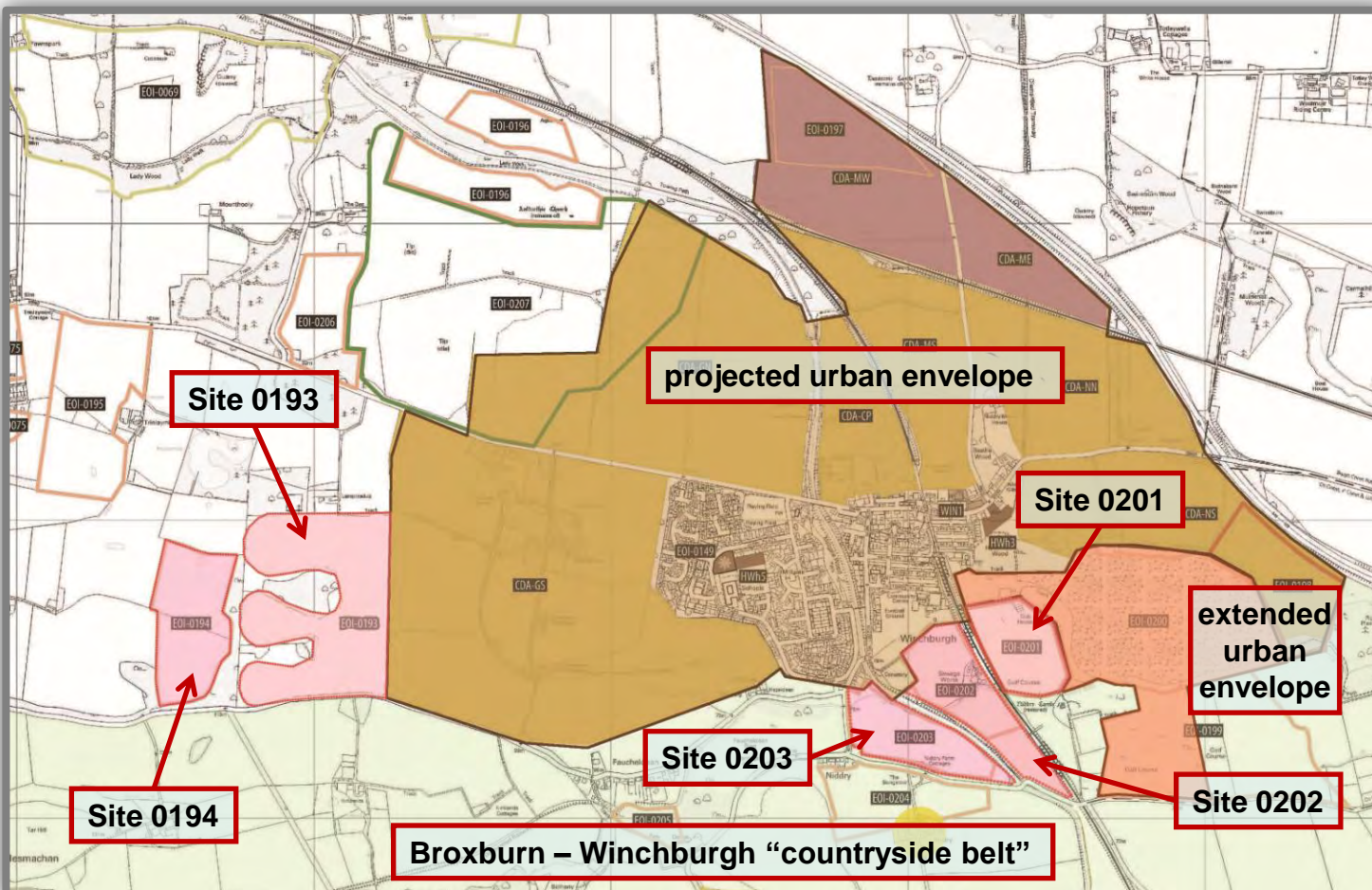
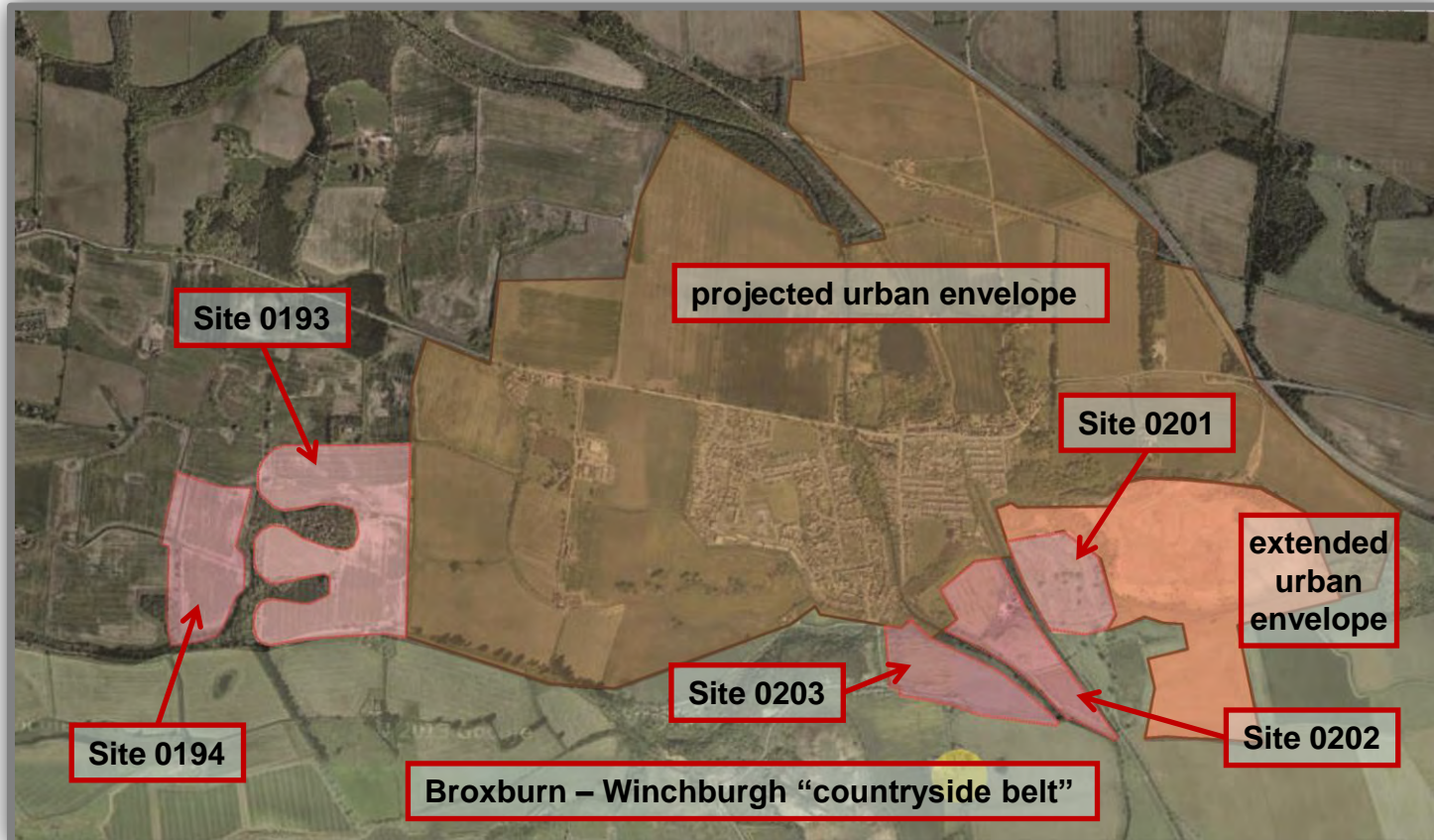
- Net Development Area of 6.6 hectares
- Medium density – 200 homes

Site 0202 – 7.2 hectares

- Net Development Area of 5 hectares
- Medium/Higher Densities – 190 homes

Site 0203 – 7.9 hectares

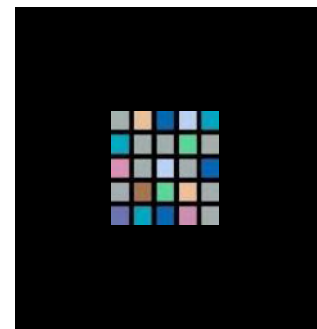
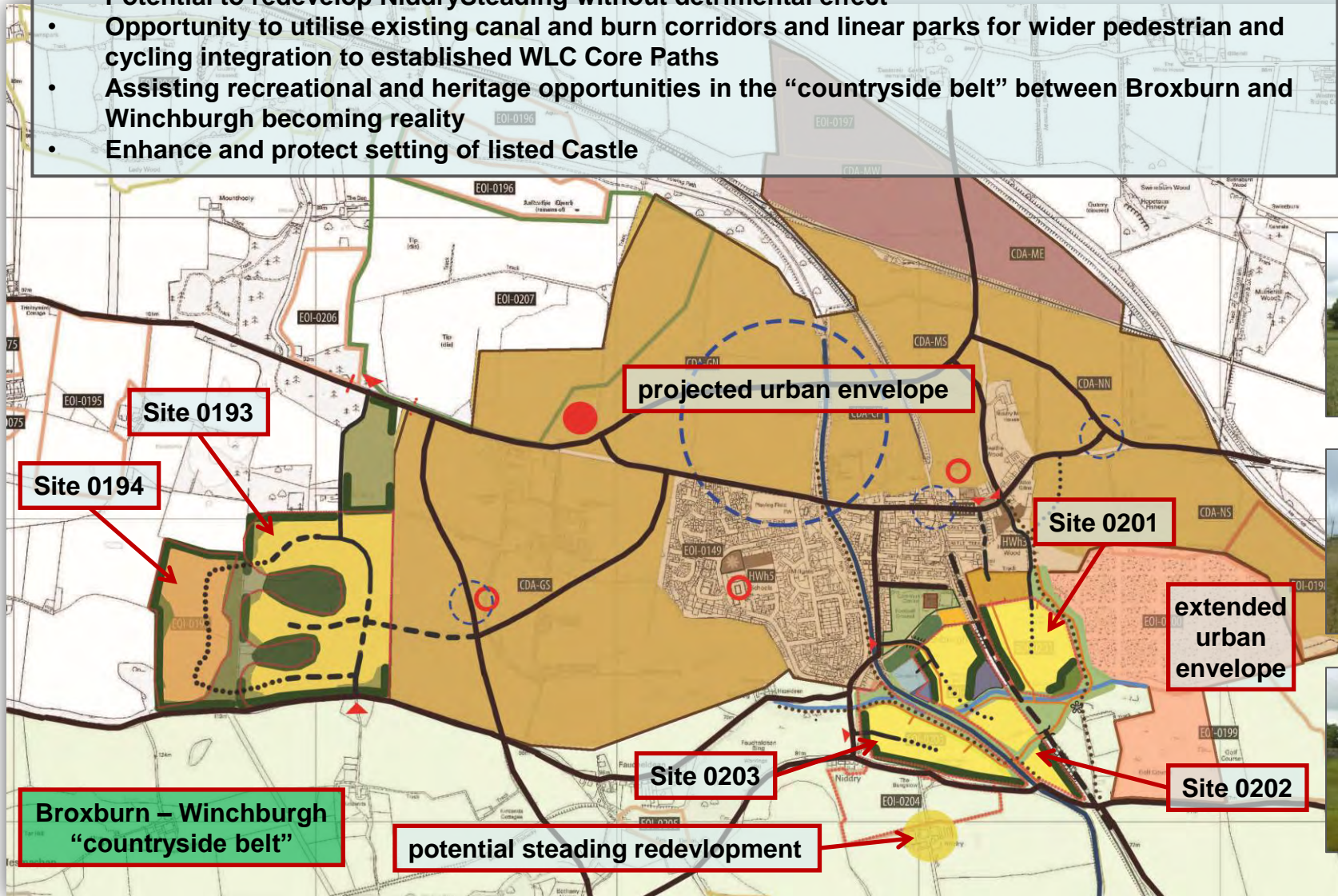
- Net Development Area of 6 hectares
- Lower Rural densities – 130 homes



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opportunities

- Natural extension west, south and east of agreed urban envelope in line with approved Winchburgh Development Masterplan
- Opportunity to integrate and concentrate higher density development closer to existing amenities, and lower density development in more peripheral rural settings
- Sustainable - convenient location to all existing and proposed services and amenities
- Sustainable – convenient location to all existing and proposed public transport routes
- Potential enhancement of existing community facilities
- Potential extension to Cemetery with new safe access
- Potential improvement and relocation of allotments
- Potential to redevelop Niddry Steading without detrimental effect
- Opportunity to utilise existing canal and burn corridors and linear parks for wider pedestrian and cycling integration to established WLC Core Paths
- Assisting recreational and heritage opportunities in the “countryside belt” between Broxburn and Winchburgh becoming reality
- Enhance and protect setting of listed Castle

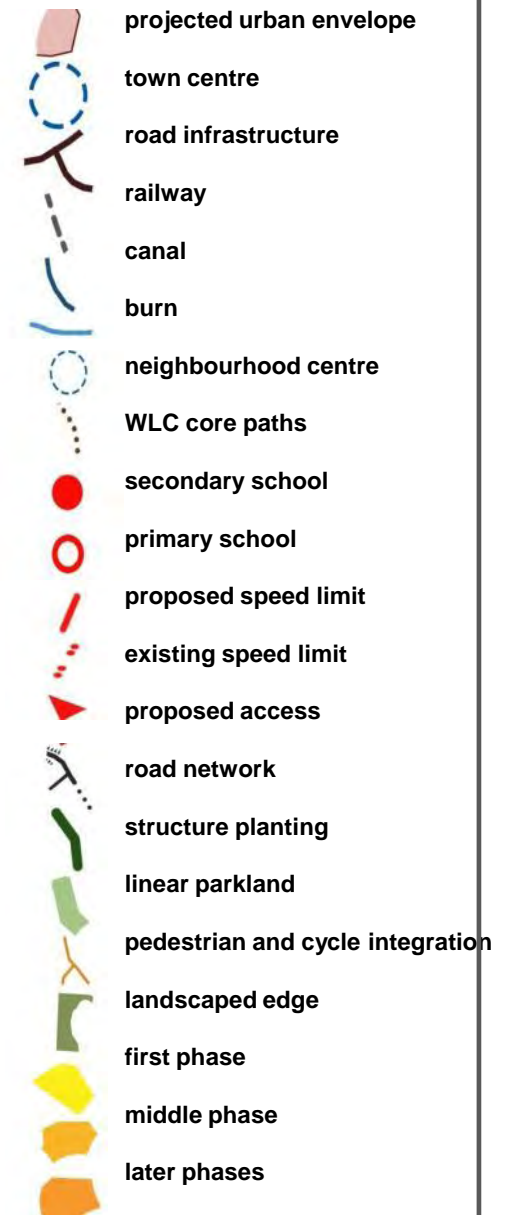
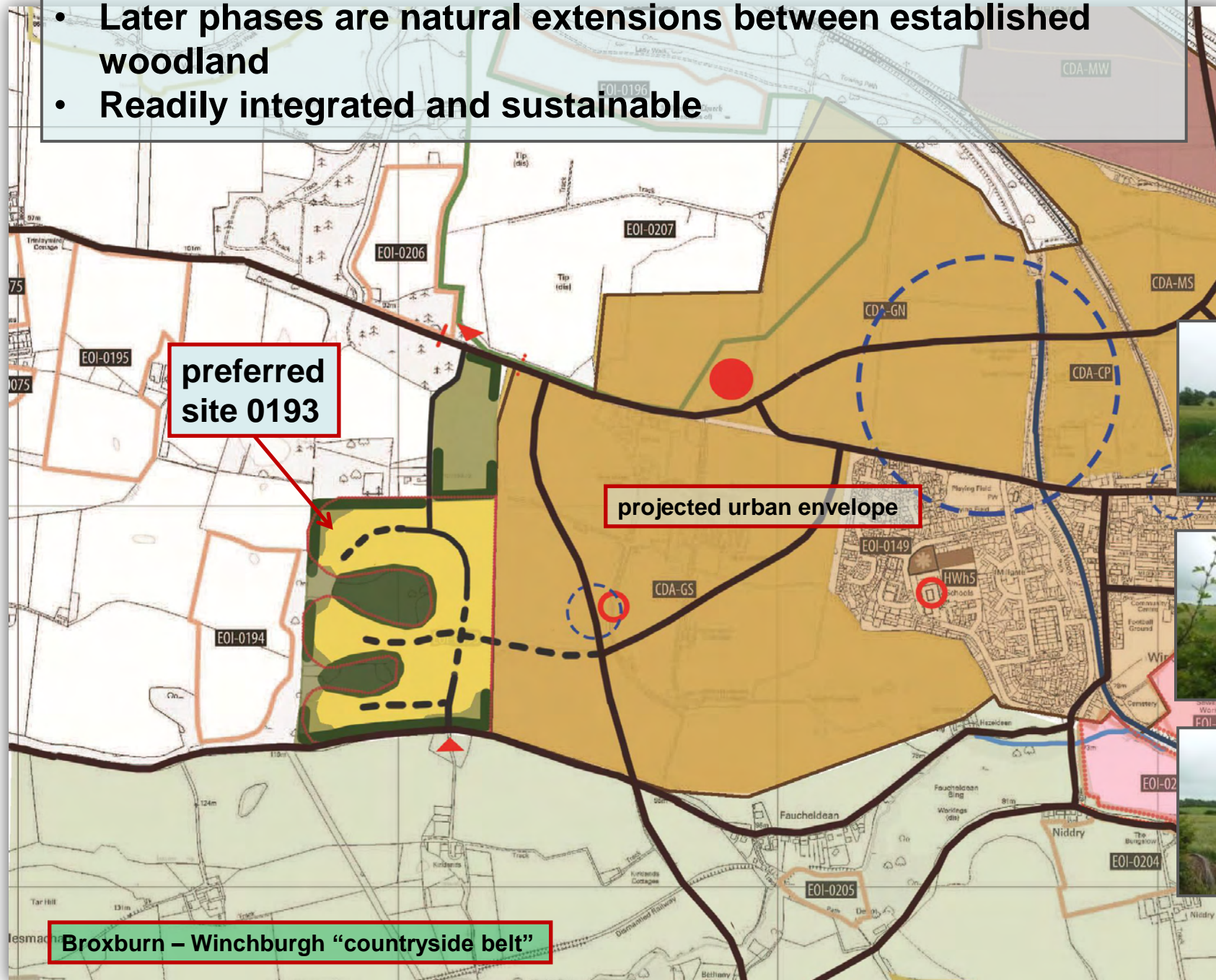


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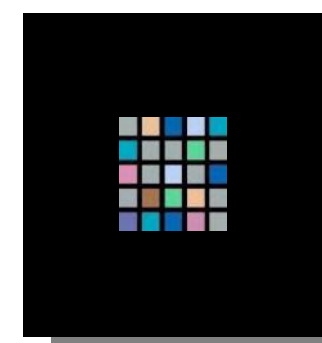
- Natural westward expansion of agreed urban envelope
- Early first phase possible
- Second phase follows after road link
- Later phases are natural extensions between established woodland
- Readily integrated and sustainable

preferred site 0193

22.7 hectares - Net Development Area of 14 hectares
Lower Rural densities – 300 homes



Transportation and Access: the sites form an extension to the western extent of Winchburgh and ground is contractually available to form access links with the main Winchburgh site to the east. However, even in the absence of this link, two further access options exist to the north and south of the site. The access to the north would tie into the B9080 Threemiletown to Winchburgh road where adequate sightlines currently exist. This road is also home to First's flagship 38 bus service offering connections with Linlithgow / Falkirk / Stirling and Edinburgh. Taking access here would afford an opportunity to create a gateway on the eastbound approach to Winchburgh which would serve to lower vehicle speeds before entering what is fast becoming the new urban limit. A further alternative access opportunity is also available onto the Faucheldean road to the south where, again, adequate visibility exists. This current road is more rural in character offering opportunities for informal recreation particularly for cyclists. The site therefore has three connection opportunities, all of differing character although the masterplanning of the area should be careful to avoid the creation of any 'rat run' opportunities via the site.

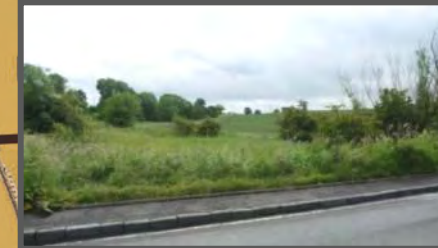
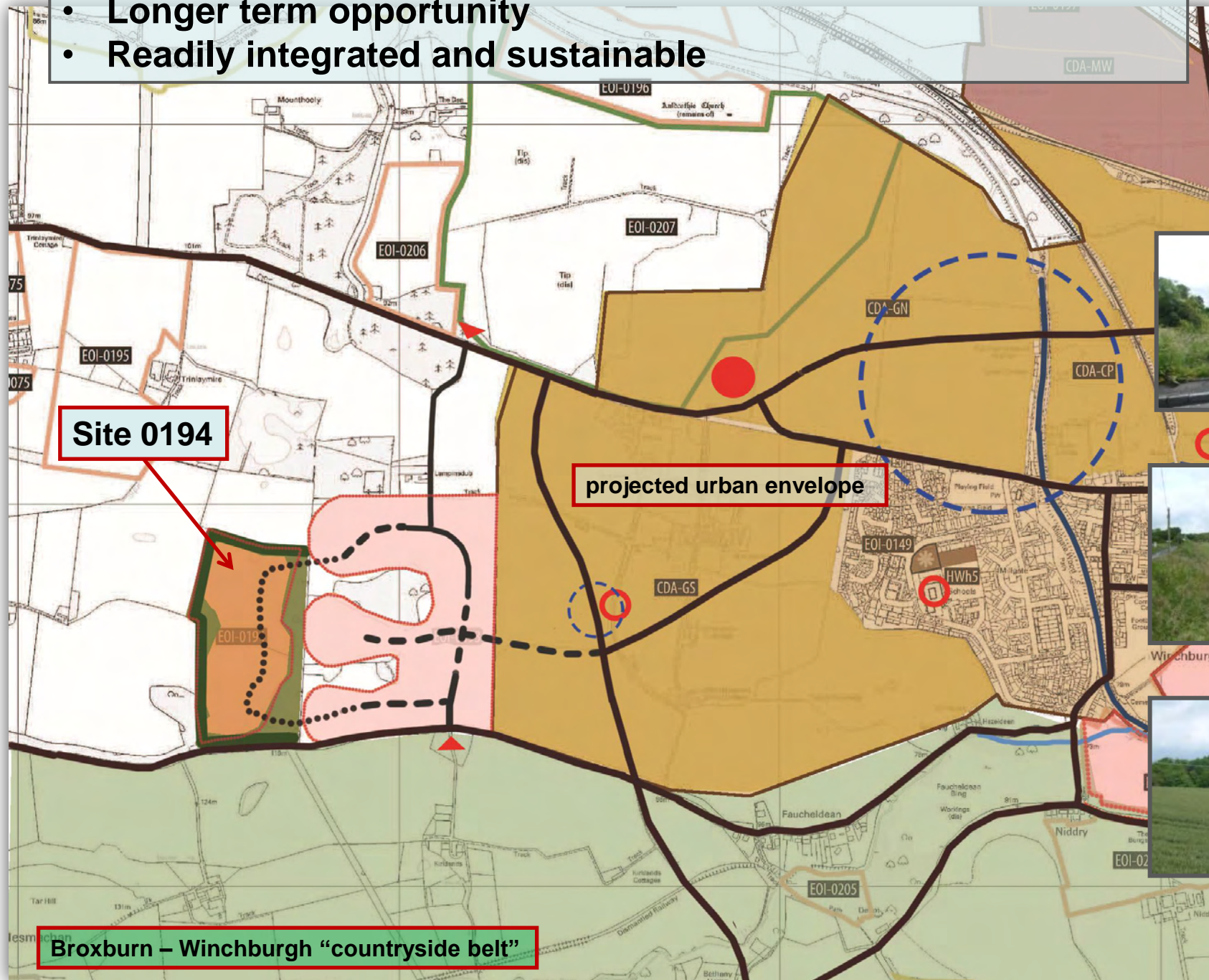


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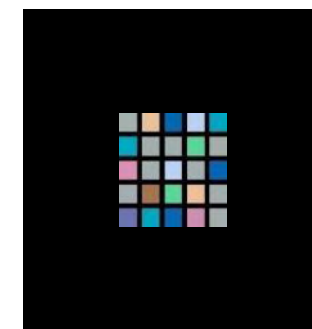
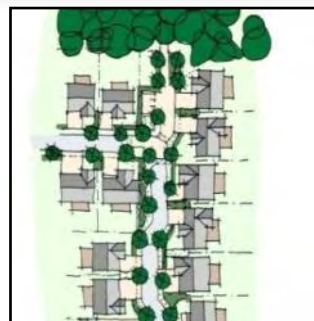
site 0194

11.5 hectares - Net Development Area of 8.5 hectares
Lower Rural densities – 185 homes

- Natural westward expansion of agreed urban envelope
- Longer term opportunity
- Readily integrated and sustainable



- projected urban envelope
- town centre
- road infrastructure
- railway
- canal
- burn
- neighbourhood centre
- WLC core paths
- secondary school
- primary school
- proposed speed limit
- existing speed limit
- proposed access
- road network
- structure planting
- linear parkland
- pedestrian and cycle integration
- landscaped edge
- first phase
- middle phase
- later phases



site 0201

9.4 hectares - Net Development Area of 6.6 hectares
 Medium Density – 200 homes

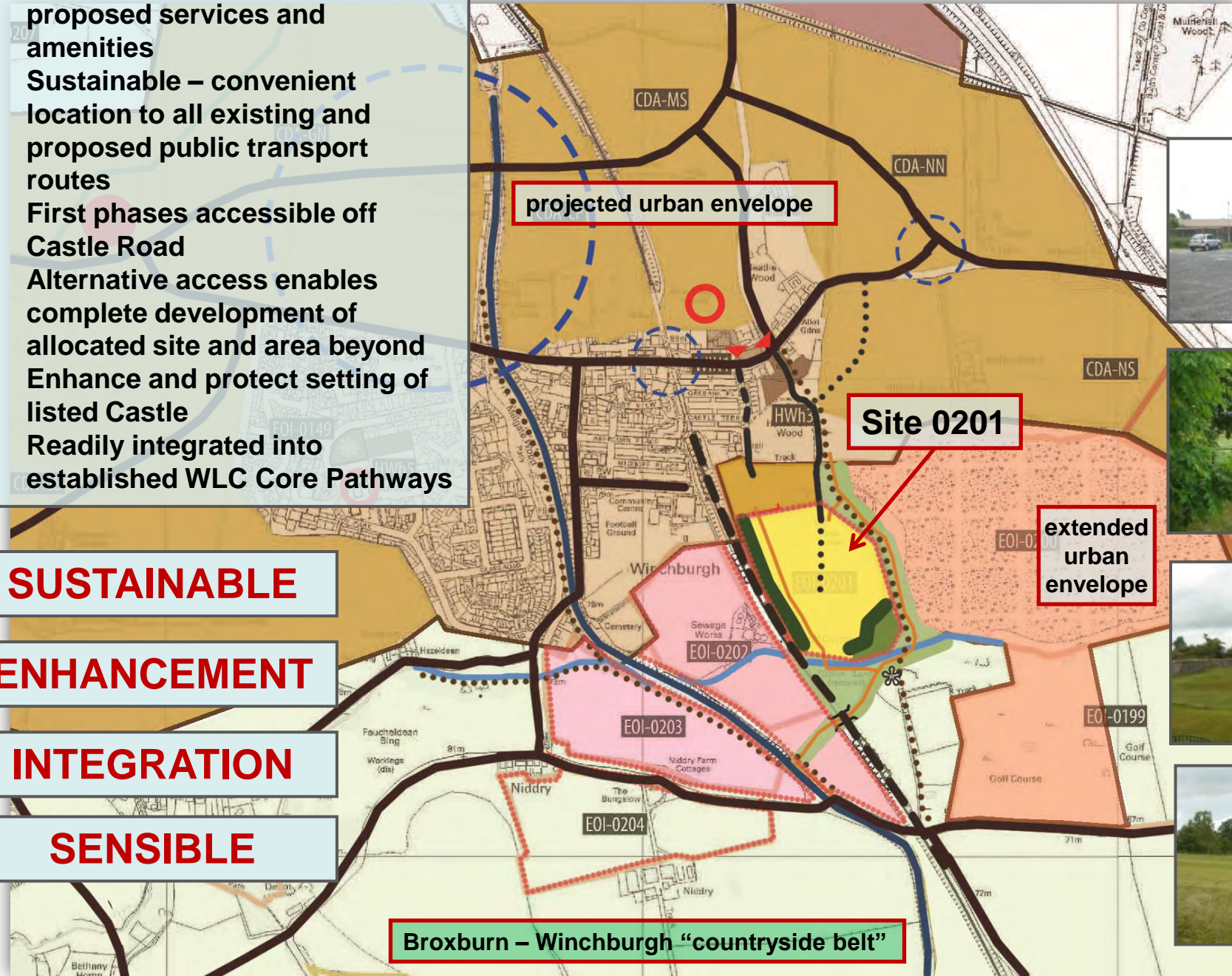
- Natural extension south and east of existing urban envelope
- Sustainable - convenient location to all existing and proposed services and amenities
- Sustainable – convenient location to all existing and proposed public transport routes
- First phases accessible off Castle Road
- Alternative access enables complete development of allocated site and area beyond
- Enhance and protect setting of listed Castle
- Readily integrated into established WLC Core Pathways

SUSTAINABLE

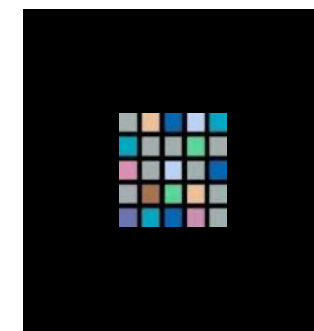
ENHANCEMENT

INTEGRATION

SENSIBLE



- projected urban envelope
- town centre
- road infrastructure
- railway
- canal
- burn
- neighbourhood centre
- WLC core paths
- secondary school
- primary school
- Grade A Listed Niddry Castle
- proposed access
- road network
- structure planting
- linear parkland
- pedestrian and cycle integration
- protective castle setting
- proposed new allocation
- existing allocation

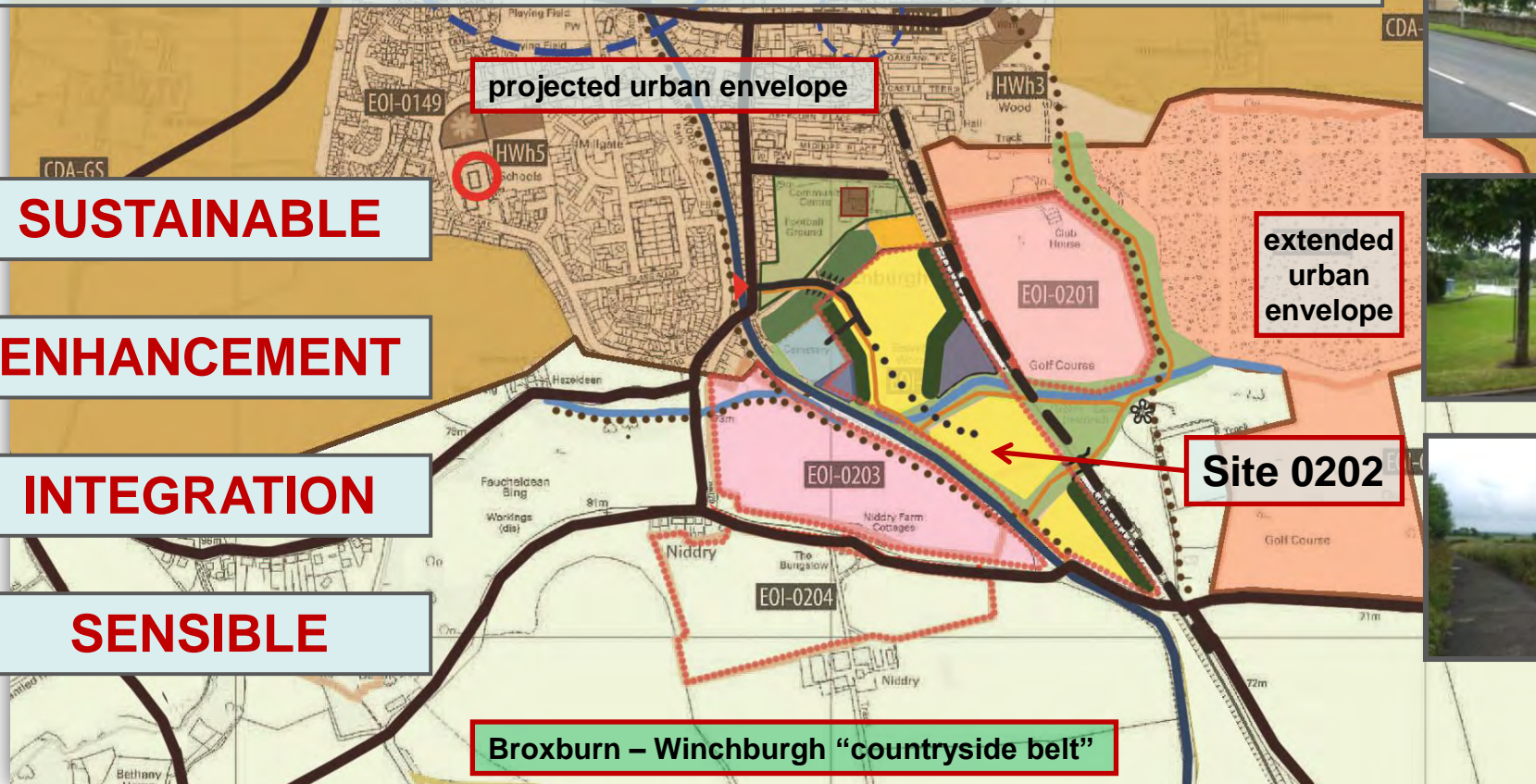


site 0202

7.2 hectares - Net Development Area of 5 hectares
Medium/Higher Densities – 190 homes

- Natural extension south and east of existing urban envelope
- Opportunity to integrate and concentrate higher density development closer to existing amenities.
- Sustainable - convenient location to all existing and proposed services and amenities
- Sustainable – convenient location to all existing and proposed public transport routes
- Potential enhancement of existing community facilities to compliment the long-term tenure of the adjacent park by West Lothian Council
- Potential extension to Cemetery and new safe access
- Potential improvement and relocation of allotments
- Opportunity to utilise existing canal and burn corridors for wider pedestrian and cycling integration to WLC Core Pathways
- Assisting recreational and heritage opportunities in the “countryside belt” between Broxburn and Winchburgh becoming reality

- projected urban envelope
- town centre
- road infrastructure
- railway
- canal
- burn
- neighbourhood centre
- WLC core paths
- secondary school
- primary school
- Grade A Listed Niddry Castle
- existing community facility
- existing cemetery and extension
- existing treatment works
- proposed access
- road network
- structure planting
- linear parkland
- pedestrian and cycle integration
- landscaped edge
- proposed new allocation
- possible allotment improvement/relocation

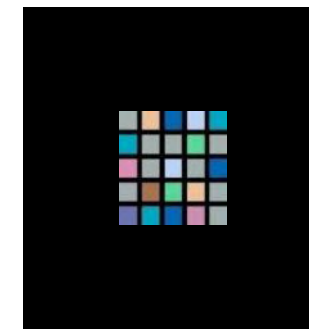


SUSTAINABLE

ENHANCEMENT

INTEGRATION

SENSIBLE

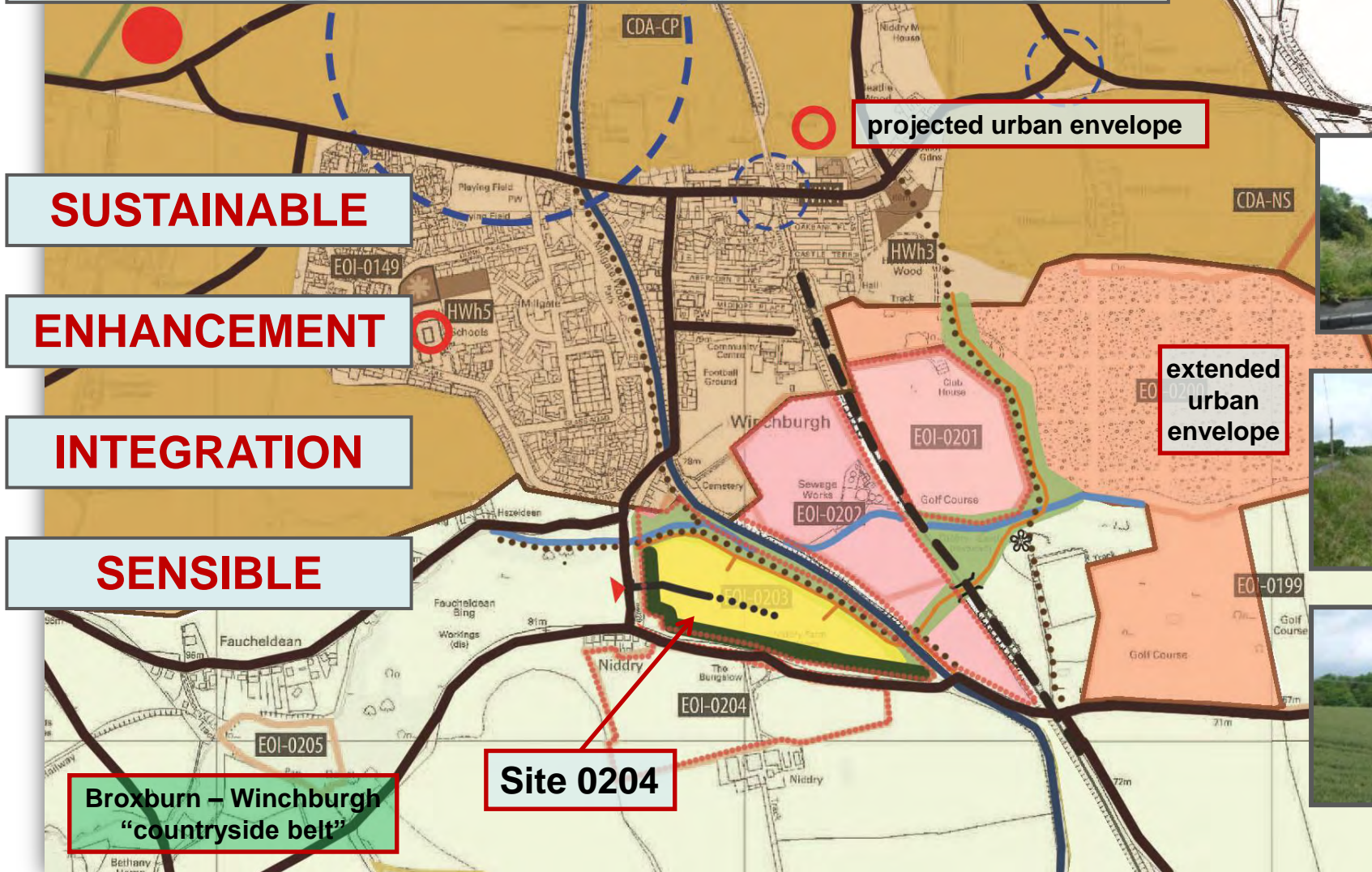


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site 0203

7.9 hectares - Net Development Area of 6 hectares
 Lower/Rural/Densities – 130 homes

- Natural extension south and east of existing urban envelope
- Opportunity to incorporate lower density executive homes
- Sustainable - convenient location to all existing and proposed services and amenities
- Sustainable – convenient location to all existing and proposed public transport routes
- Opportunity to utilise existing canal and burn corridors for wider pedestrian and cycling integration to WLC Core Pathways
- Assisting recreational and heritage opportunities in the “countryside belt” between Broxburn and Winchburgh becoming reality



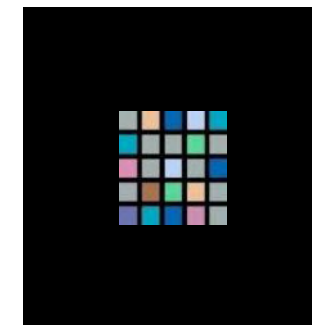
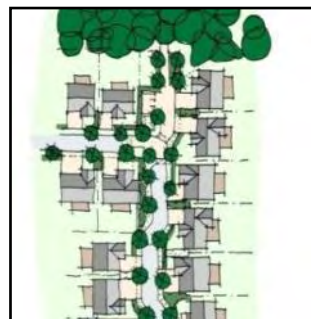
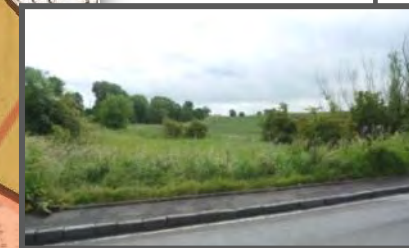
SUSTAINABLE

ENHANCEMENT

INTEGRATION

SENSIBLE

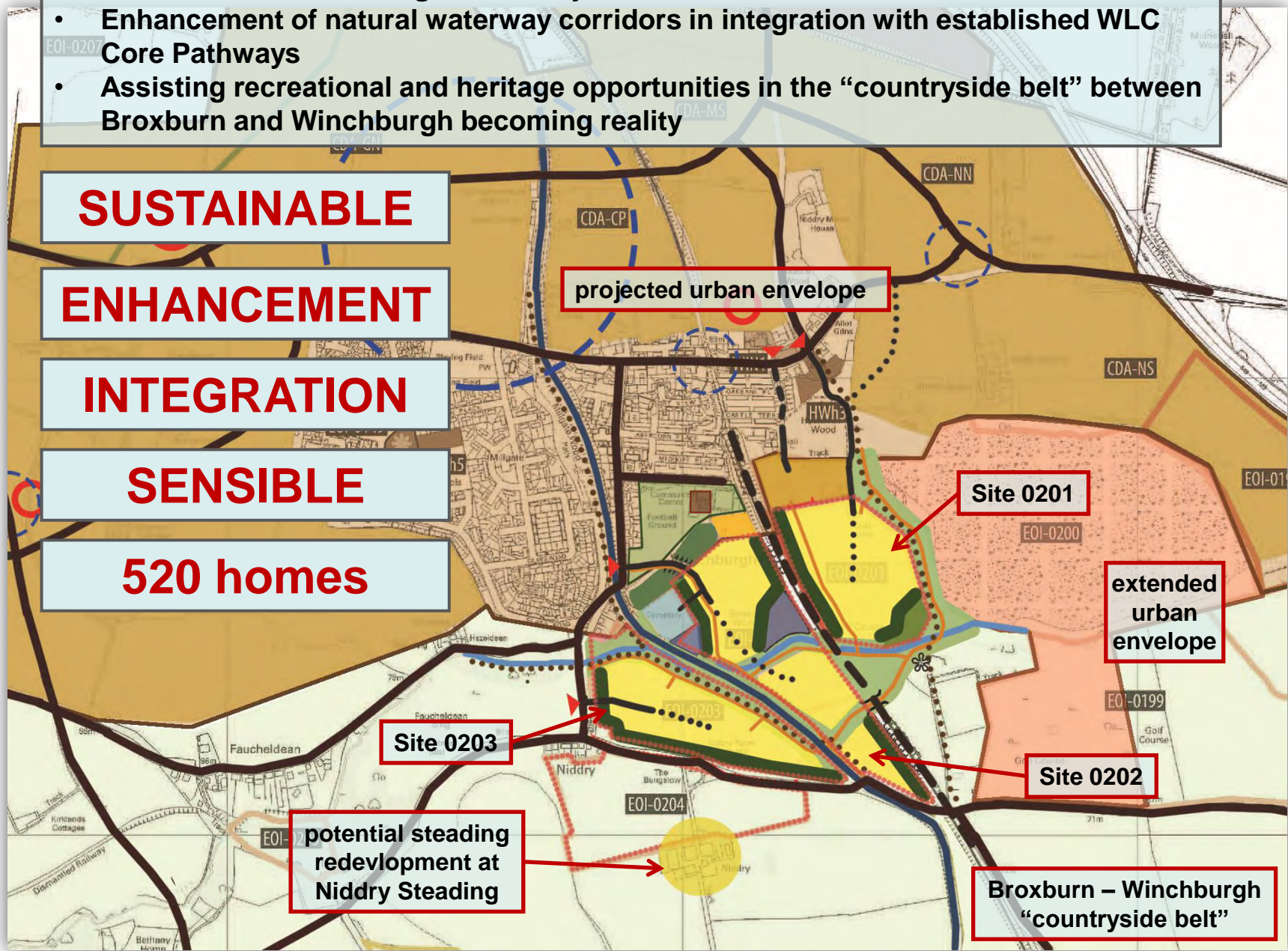
- projected urban envelope
- town centre
- road infrastructure
- railway
- canal
- burn
- neighbourhood centre
- WLC core paths
- secondary school
- primary school
- Grade A Listed Niddry Castle
- proposed access
- road network
- structure planting
- linear parkland
- pedestrian and cycle integration
- protective castle setting
- proposed new allocation



- Natural extension to existing urban envelope
- Sustainable - convenient location to all existing and proposed services and amenities
- Sustainable – convenient location to all existing and proposed public transport routes
- Enhancement of existing community facilities
- Enhancement of natural waterway corridors in integration with established WLC Core Pathways
- Assisting recreational and heritage opportunities in the “countryside belt” between Broxburn and Winchburgh becoming reality

Sites

0201/0202/0203 combined



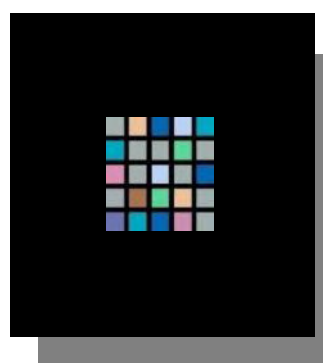
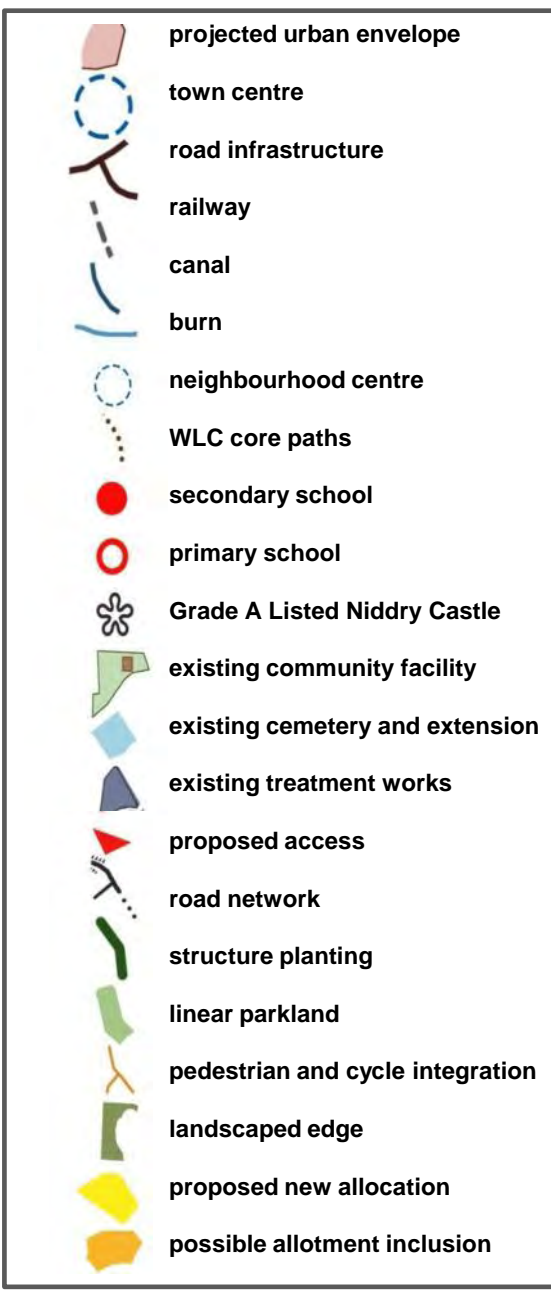
SUSTAINABLE

ENHANCEMENT

INTEGRATION

SENSIBLE

520 homes



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combined situation

SUSTAINABLE

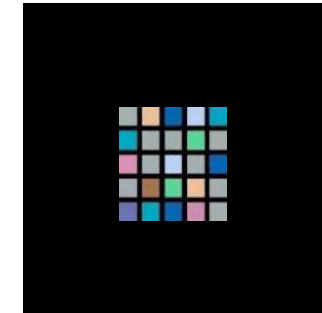
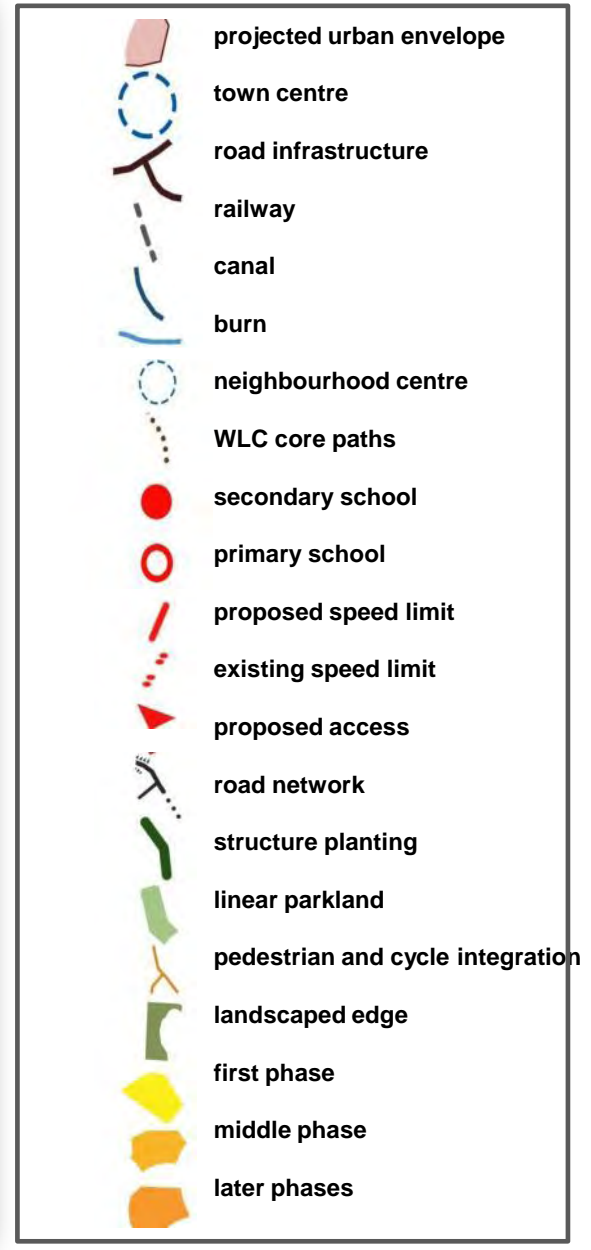
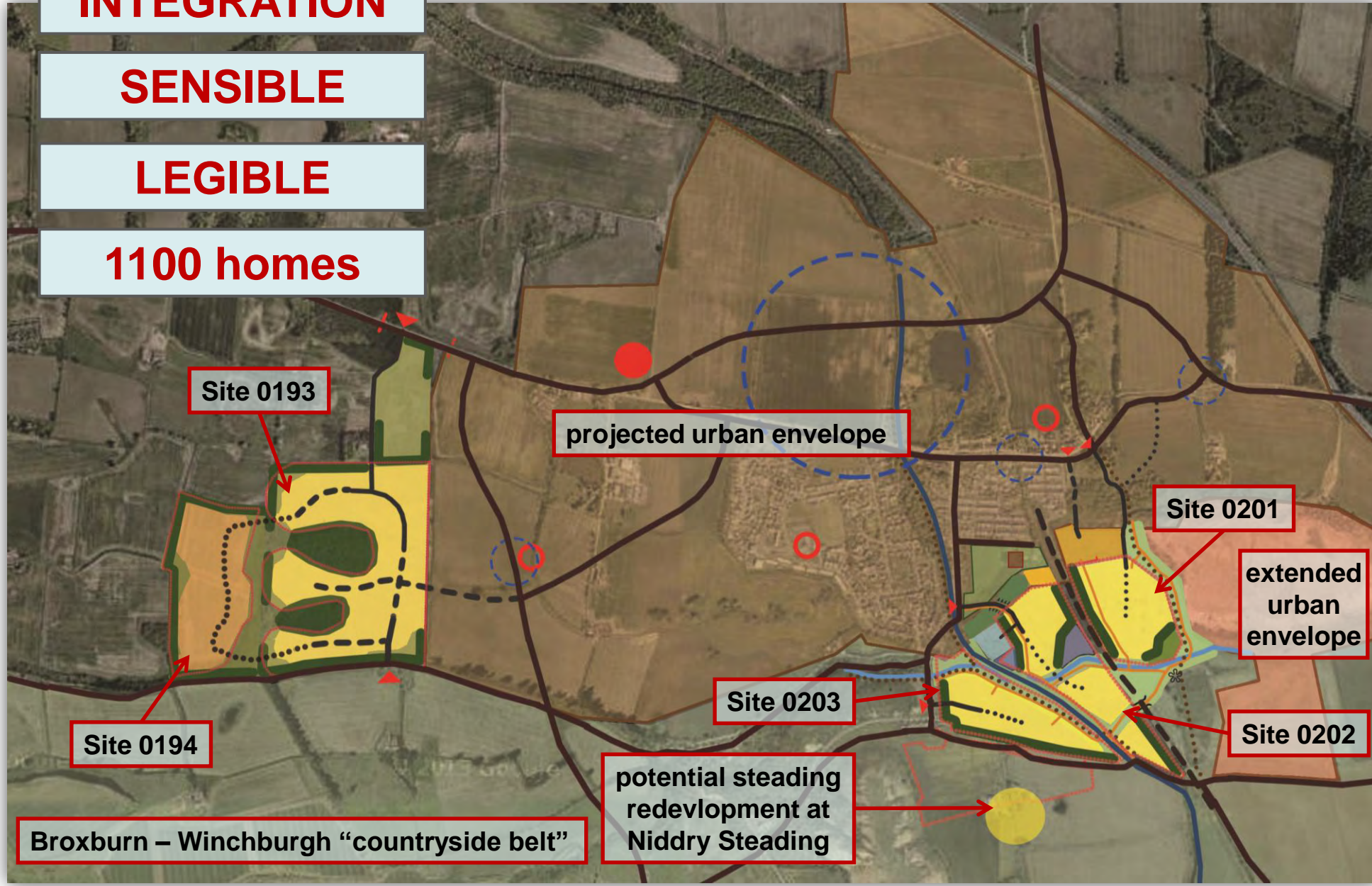
ORGANIC

INTEGRATION

SENSIBLE

LEGIBLE

1100 homes



team

Client:

**Donald Noble
Aithrie Estates and Hopetoun Estate Trust
Hopetoun Estates Office
Home Farm
Hopetoun
South Queensferry
EH30 9SL**

Planning Consultant:

**Peter Allan
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Architect:

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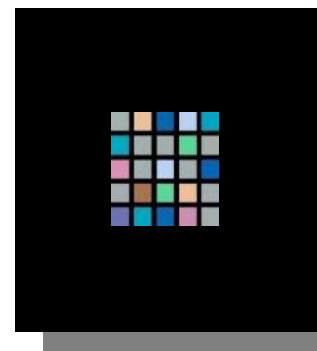


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