

ema

architects + masterplanners



SOUTHDALE, ARMADALE

REPRESENTATION TO THE PROPOSED WEST LOTHIAN LOCAL DEVELOPMENT PLAN

ON BEHALF OF EWP INVESTMENTS LTD

NOVEMBER 2015



CONTENTS

1. SUSTAINABLE SOUTHDALE - THE STORY SO FAR

1. Sustainable Southdale – The Story So Far
2. The Site
3. The Representations
4. Approved Masterplan - Why does Southdale need to change?
5. Proposed New Masterplan - The Vision
6. Housing
7. Education
8. Proposals Map 4 and associated issues
9. Employment Land
10. Access Issues
11. Sustainable Southdale
12. Countryside Belt & Coalescence
13. Ground conditions and Site Servicing
14. Conclusion

Southdale, Armadale stands as the single outstanding success of the Armadale Core Development Area (CDA) since the adoption of the 2009 West Lothian Local Plan.

Since planning permission was granted for 1,000 new homes in 2011, the landowner (EWP) has worked closely with West Lothian Council to deliver a sustainable new neighbourhood. Southdale now has a remarkable range of housing and employment opportunities, including 360 new homes and more than 200 jobs.

New employers and community facilities include a new ASDA store, an Arnold Clark Citroen car dealership, a pre-school nursery, and a Marston's Inn restaurant. A new primary school is now under construction and is anticipated to open in 2016.

It is widely accepted that Southdale has contributed to the rejuvenation of Armadale, both physically and demographically.

This document details EWP's consultation response to the Proposed West Lothian Local Development Plan (WLLDP).




The consultation response is placed in the context of a vision for a new masterplan.

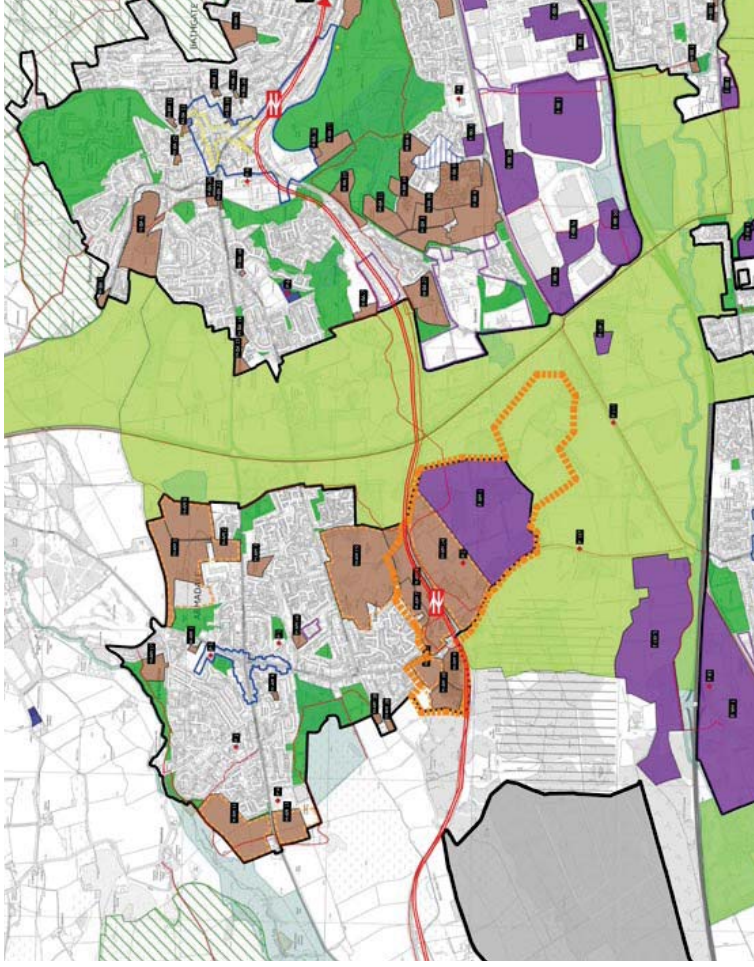


2. THE SITE



Site Location

-  Settlement Boundary from Proposals Map 4
-  Submission area
-  North Clyde Railway Line - Edinburg to Glasgow



Map 4: Bathgate Area - West Lothian Local Plan Proposed Plan Oct 2015

 Submission Area

West Lothian Local Development Plan: Key

- | | | | |
|------------------------------------------------------|--------------------------------------|-------------------------------|----------------------------|
| Countryside | Heritage | Employment | Housing |
| ▲ Nature Reserve | ★ Scheduled Monument | ▲ Employment Sites | ■ Housing Allocation |
| — Protected Right of Way/Core Path | ■ Conservation Area | — Employment Area Boundary | ■ Lowland Croft Area |
| — Proposed Strategic Route | ■ Area of Special Control | — Search area for opencasting | ■ Local Biodiversity Sites |
| — Land to West Suitable for Very Low Density Housing | ■ Royal Park & Peel | — Waste Management Site | ■ Geodiversity (BGS) |
| ■ SSSI | ■ Development Restriction (The Rigs) | — Local Biodiversity Sites | |
| ■ Special Area of Conservation | ■ Designed Gardens & Landscapes | — Geodiversity (BGS) | |
| ■ Special Protection Area | ■ Battlefields | | |
| ■ SLA | | | |
| ■ Countryside Belt | | | |
| ■ Land Safeguarded for Open Space | | | |

3. THE REPRESENTATIONS



So why do we need to object to the Proposed Local Development Plan?

The Proposed Local Development Plan contains various policies which, when taken together with the nature of this particular site, impact on the viability of the Southdale project. Without amendment, future phases of the Southdale project are not economically viable.

Objections to the relevant policies are contained within this document, but the primary purpose is to present a positive vision for a redesigned masterplan that is economically viable and which fulfils the core objectives of the Council and the community; namely **new homes, jobs and education facilities in a sustainable location**.

This document contains objections and representations to a number of policies in the Proposed Local Development Plan. The objections are detailed on the following pages and are summarised below.

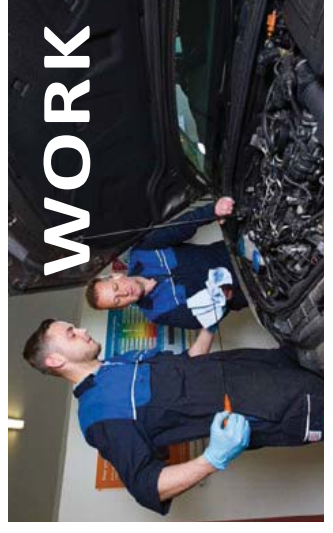
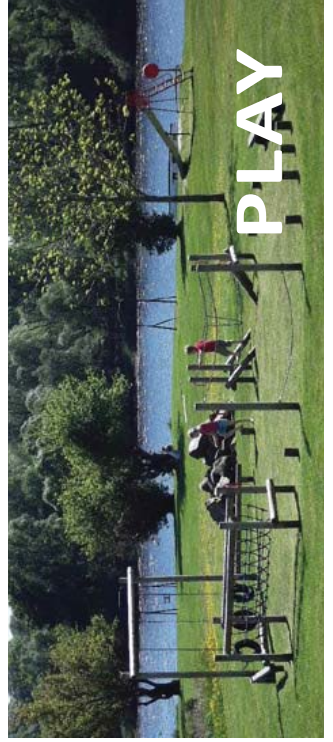
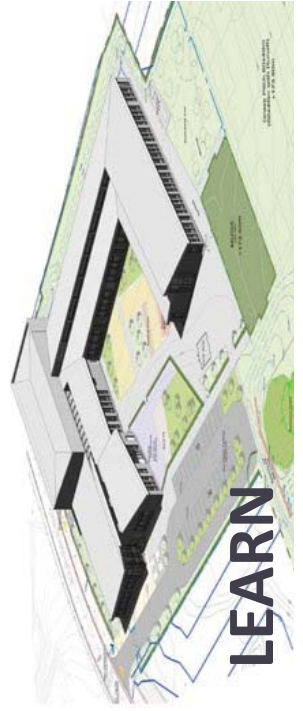
This document should also be read in conjunction with representations made by Holder Planning on behalf of EWP in respect of the Countryside Belt and Housing Land Supply.

Main Issues Report

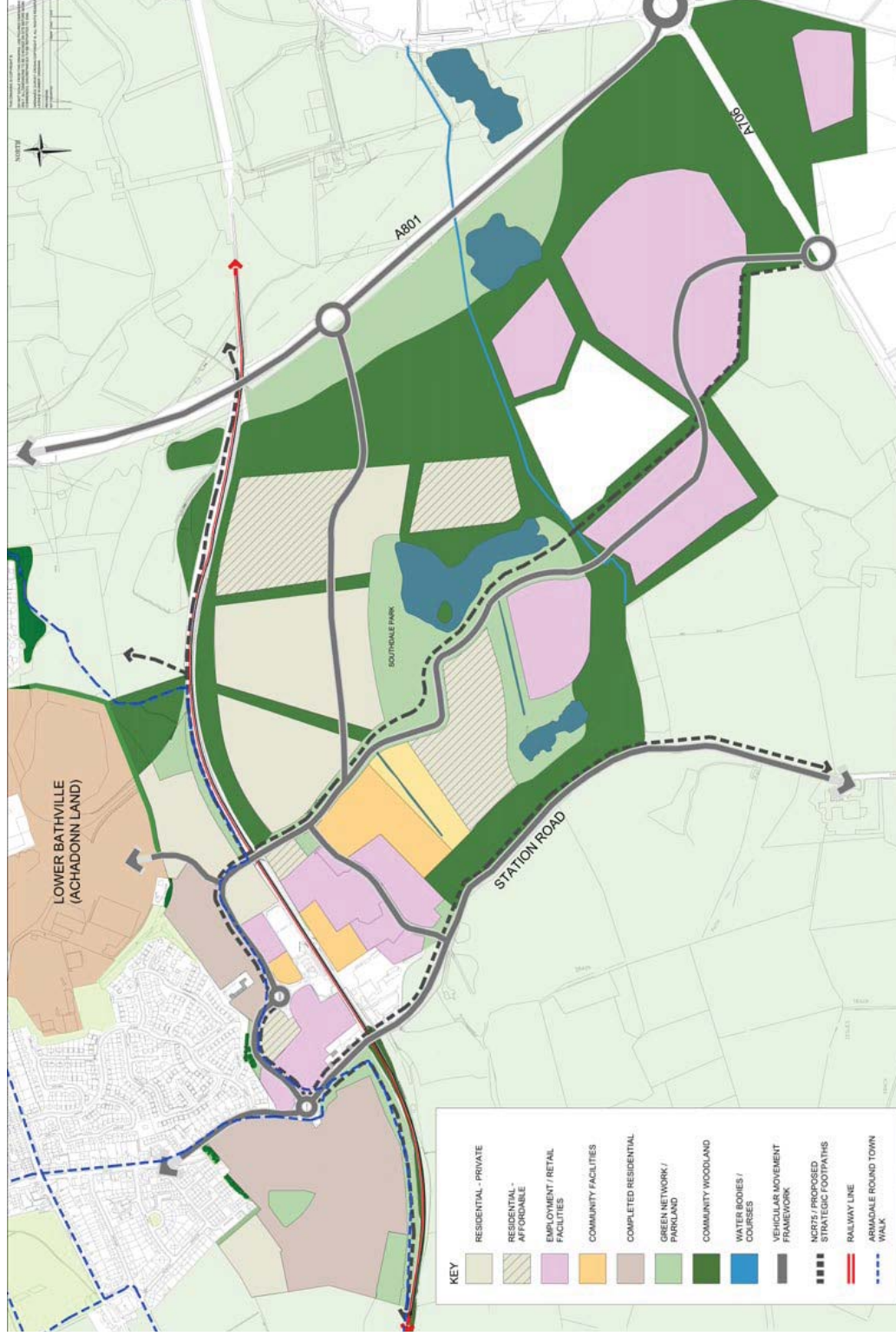
A submission was made to the Main Issues Report stage of the LDP process, proposing an extension into unallocated land to the south of the existing allocation. The Council declined to accept the proposal on the following basis:

1. The site was not a sustainable location for development
2. The proposal would result in coalescence

The proposal contained within this document differs from the proposal submitted to the MIR, in that the housing area has been refocused around the new primary school and station, and the developable area in the unallocated land has been reduced significantly. These modifications fully address the reasons given in the MIR for not allocating the site.



5. PROPOSED NEW MASTERPLAN



The Vision

The redesigned masterplan proposes an additional 600 new homes to result in an economically viable sustainable development of 1,600 new homes and a significant area of employment land, set around a railway station and a new primary school.

The proposal for the increased allocation has been costed and offers the following:

- Land for an increased provision of affordable housing from 25% to 37.5% (600 units out of a total of 1,600 units)
- Sufficient new education facilities for the increased number of homes, including the gifting of additional land to West Lothian Council
- Transportation improvements, including delivery of the strategic east-west road connection from the A801 to Station Road
- Deliverable employment land in a location attractive to employers

In order to achieve this, the following amendments are proposed to the masterplan:

1. Employment land relocated to south of existing allocation (quantum of employment land unchanged) closer to the A706 and M8 strategic road network.
2. Residential land focussed in north of site next to the school and local centre.
3. Number of residential units increased from 1,000 to 1,600.





POLICY HOU5 - Affordable Housing

Policy HOU5 requires 15% provision for developments in the Armadale & Blackridge area, but requires 25% provision for developments in the Core Development Area.

The cost of providing the infrastructure for the Core Development Areas is exponentially more expensive than the cost of developing small allocated sites or windfall sites. The pie chart shown earlier in this document illustrates that the cost of remediating and servicing the land at Southdale amounts to 42% of the market value of the land.

The Proposed LDP requires that land for affordable housing should be remediated and serviced. West Lothian Council also requires the landowner to pay developer contributions for the affordable housing sites.

The combination of the abnormal costs of remediating and servicing affordable land and paying developer contributions for an affordable housing provision of 25% makes not only the affordable housing but the entire project unviable.

There is a further effect of the policy, which is that it unfairly burdens CDAs in secondary market locations in the west of the local authority area where land values are almost half of land values in the east. CDAs in the east of West Lothian may be able to sustain development and comply with HOU5, but CDAs in the west cannot. This inequity is an unfair constraint on the towns and communities in these secondary market locations, including Armadale.

From these reasons HOU5 should be amended to require 15% affordable housing on the CDA land in Armadale, in parity with the requirement for non-CDA sites in the Armadale & Blackridge area.

Why do we need more houses?

Other parts of the Armadale CDA will not deliver houses in the period of the Strategic Development Plan.

It is widely acknowledged that the 400 units allocated at Lower Bathville (Achadonn land) (H-AM 15) are unviable for the foreseeable future due to the cost of extensive contamination and poor ground conditions. It is also emerging that 270 units at Colinsiel are also unviable because of ground conditions.

As a result, it is becoming clear that there are 680 units that will not be built in Armadale in the period of the Strategic Development Plan. There are also other potential shortfalls in the wider West Lothian area.

Some of the shortfall can be met at Southdale without detriment to the Council's LDP objectives, in a location focused around a railway station, a new primary school and employment opportunities. Southdale is in a location which is exemplary in terms of its sustainability.

Allocating an additional 600 units to Southdale would not in any way prejudice the delivery of sites which are currently ineffective (Lower Bathville and Colinsiel) and these sites can still come forward as and when they become viable to develop. Arguably the development of Southdale will increase developer interest and property values in Armadale as a whole, thereby increasing the potential for the currently ineffective sites to be developed.

There is a further significant benefit of this offer in that West Lothian Council would be able to deliver the affordable provision for the entire Armadale South CDA, including the Achadonn land, within the period of the Strategic Development Plan. The 600 units offered equates to 30% of the 2,000 units allocated in the current West Lothian Local Plan. The Council would then benefit from an additional 100 affordable units from the Achadonn land when that land came forward for development. This outcome may allow the Council the flexibility to agree a phasing plan with Achadonn which could improve the viability of the Achadonn land within the current SDP period. This is a significant benefit not only to the Council, but also to the owners of the Achadonn land and the surrounding community that will benefit from its remediation. In summary, the offer has the potential to unlock the entire Armadale South CDA, which is unlikely to happen otherwise.

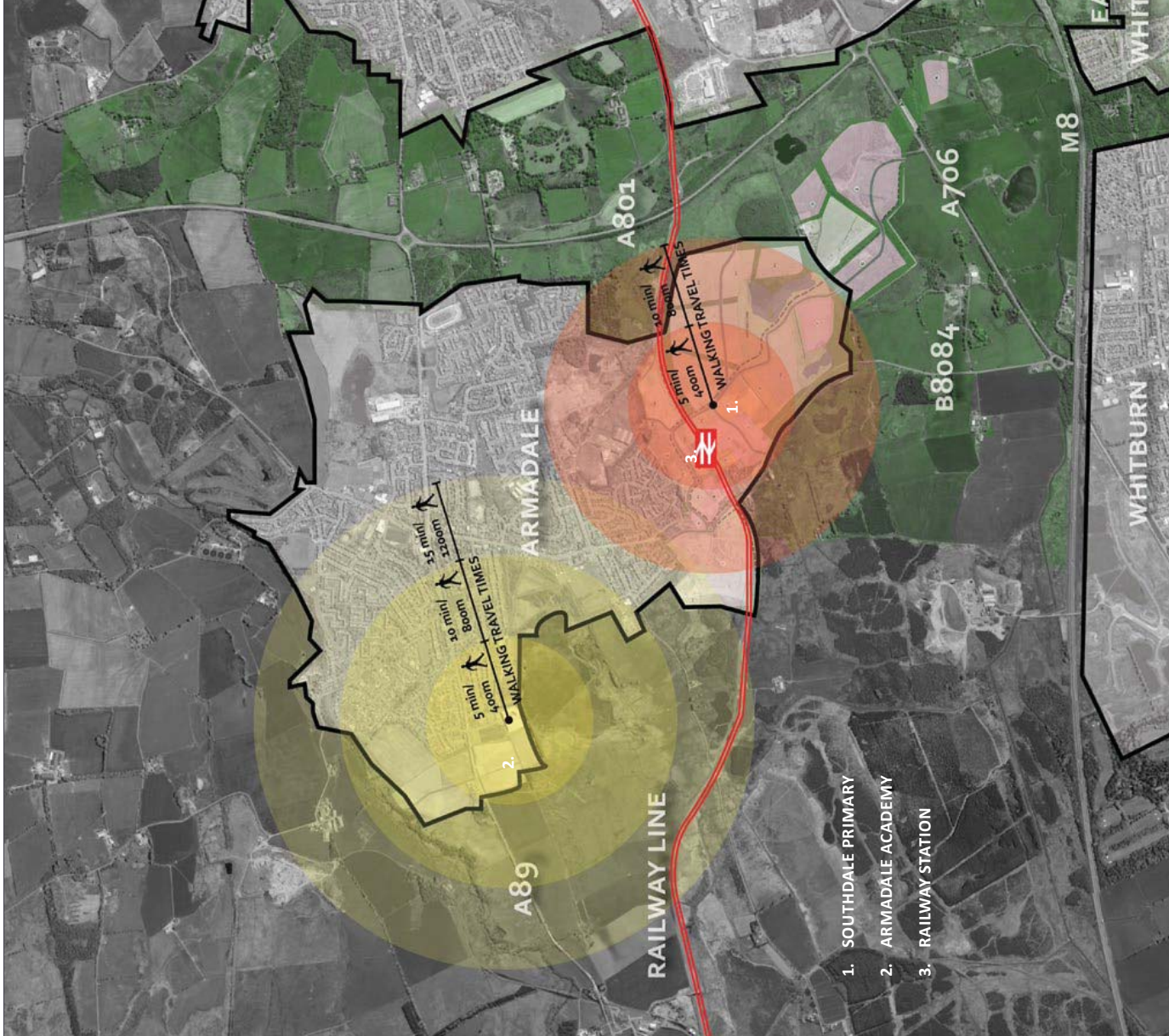
However, Southdale is offering an alternative solution to the problem presented by HOU5.

The new proposed masterplan offers an increased affordable housing provision of 37.5%, which amounts to 600 units of a total of 1,600 units.

The proposal is made on the basis that the over-provision would be provided in the form of a land transfer to West Lothian Council. The over-provision is offered on the basis that the increased value of the additional land would offset the cost of remediating and servicing the land, which would be carried out by the Council or RSL developing the affordable housing land.

The new proposed masterplan illustrates that the affordable housing land can be spread throughout the masterplan area, with more than half of it being immediately adjacent to the new primary school and local centre.

7. EDUCATION



1. SOUTHDALE PRIMARY
2. ARMADALE ACADEMY
3. RAILWAY STATION

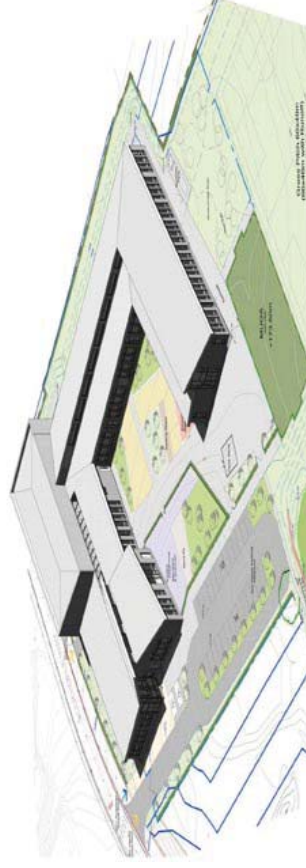
Education

The existing planning permission allows for 1,000 houses to be built. 1,000 houses would normally require a single stream school to be provided. West Lothian Council have chosen to build a two stream school in order to resolve a shortfall in the capacity of its existing primary schools in Armadale.

Southdale has paid almost £4 million towards the cost of the new primary school (approximately £10,000 per house built).

Southdale is committed to paying its fair share of the cost of the new primary school and in fact has gone further in allowing the Council to take ownership of the land for a two stream school for the benefit of the Council and other developers in Armadale at no cost. There is no equalisation agreement in place.

The two stream school currently under construction has capacity for around 1,600 houses (using a pupil product factor of 0.25). It is accepted that the Council has used the opportunity of the new Southdale primary school to relieve pre-existing capacity issues in the existing settlement of Armadale. This situation is unlikely to change. However, the landowner is prepared to gift additional land to the Council at no cost and make further financial contributions to facilitate the extension of the school, if necessary. This additional land is indicated on the new proposed masterplan immediately to the south of the existing school site. The phasing of the Southdale development in conjunction with future school rolls will determine if and when an extension becomes necessary. A phasing plan would form a key part of any future Section 75 agreement.

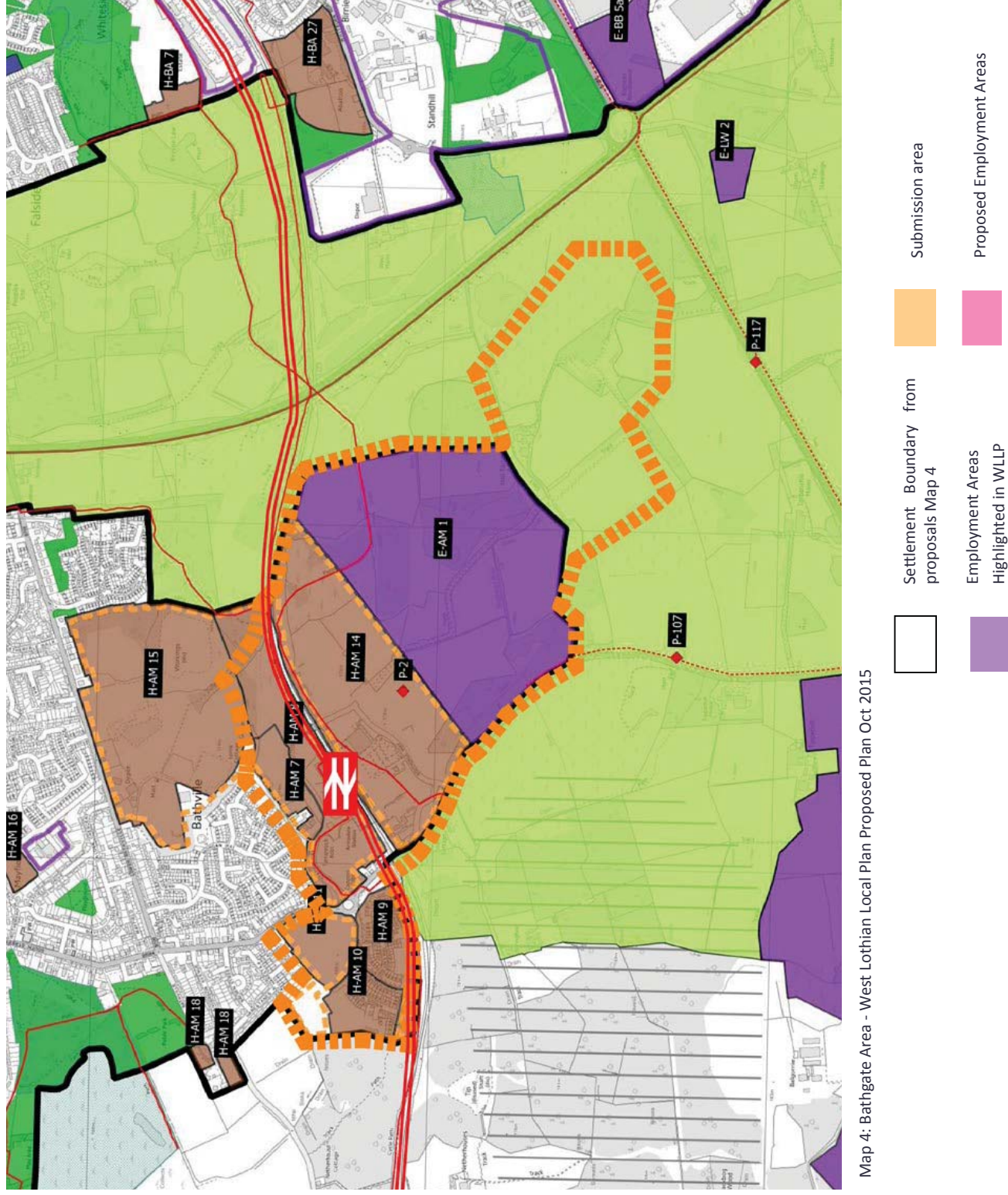


Proposed Southdale School by West Lothian Council



Armadale Academy

8. PROPOSALS MAP



Map 4: Bathgate Area - West Lothian Local Plan Proposed Plan Oct 2015

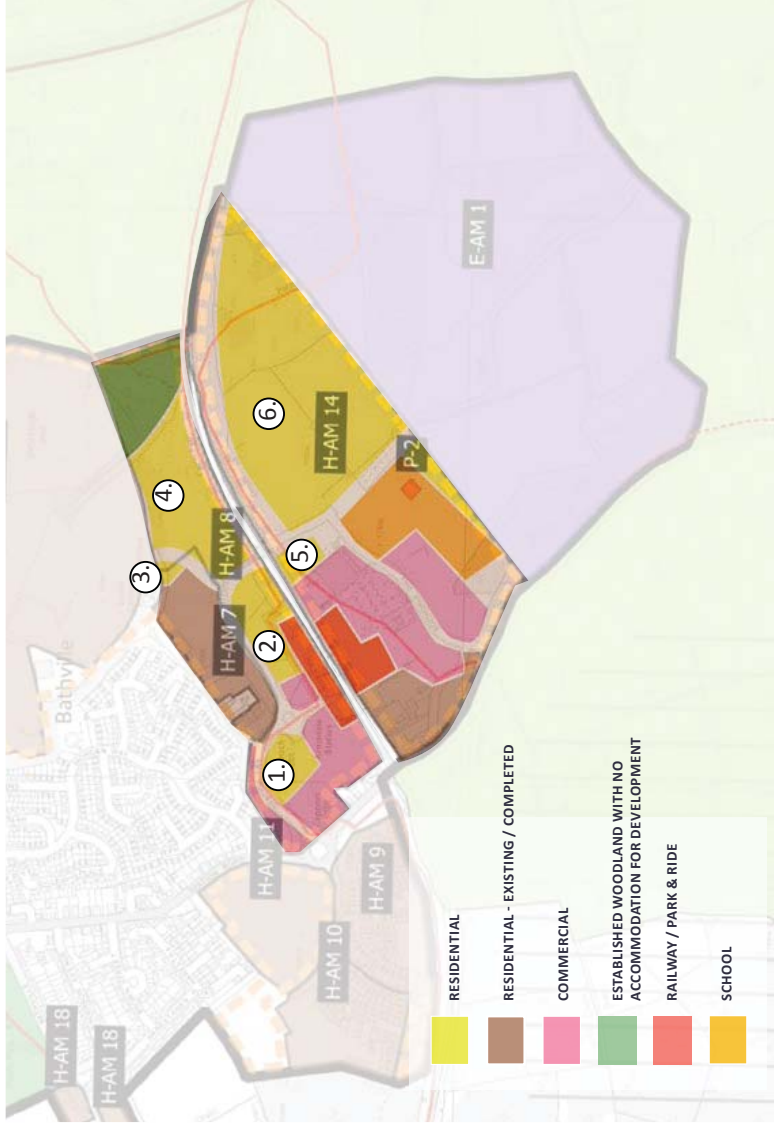
Appendix 1, Employment Land Allocations – E-AM1

The quantum of employment land is not disputed and the proposed new masterplan incorporates the requisite amount of 26.6 hectares.

However, the location of the E-AM1 should be amended for the following reasons:

1. The location of the new primary school at the heart of new homes in the Southdale community is a key principle of the proposed new masterplan. The employment area in Proposals Map 4 is immediately adjacent to the new primary school. Whilst the Proposed LDP requires that the land adjacent to the housing area should be Class 4 (App1, p101), employment uses likely to be attracted to Southdale will be Class 5 and 6 and the proximity of the employment area to the new primary school is not desirable.
2. The relocation of the employment land to the south will place it in an area where it has direct access to the A706 and is closer to established employment centres at J4M8. This would make the land more attractive to the market.
3. The split between Mixed Use and Employment land shown on Proposals Map 4: Bathgate does not reflect the location of these uses in the existing planning permission 1044/P/08 (land associated Non Material Variation dated 26 August 2011). Notwithstanding 1 and 2 above, the Proposals Map should reflect planning permissions that are in place and have been enacted.





H-AM8 / H-AM14:

1. 0.66Ha
2. 1.35Ha
3. 0.16Ha
4. 3.08Ha
5. 0.43Ha
6. 9.73Ha

Total Hectares = 15.41Ha

8.2. Chapter 6 – Development Proposals by Settlement (p80)

The Proposed LDP housing numbers for Armadale relating to Southdale are as follows:

LDP Site Ref	Location	Site Size (Ha)	Capacity
H-AM 7	Tarrareoch (Southdale Meadows)	3.0	85
H-AM 8	Tarrareoch (Remainder)	13.6	265
H-AM 9	Netherhouse Phase 1, R1A East	5.1	13 (73 built)
H-AM 10	Netherhouse Phase 1, R1B West	4.1	26 (79 built)
H-AM 11	Netherhouse (Remainder)	6.4	109
H-AM 14	Trees Farm	26.6	350
			1,000

The assumptions made in the Proposed LDP on site size and capacity of the undeveloped land are incorrect. The plan below illustrates the areas of the undeveloped land, and the capacities are as follows:

LDP Site Ref	Location	Site Size (Ha)	Capacity (at 25 units / Hectare)
H-AM 7	Tarrareoch (Southdale Meadows)	3.0	85 (under construction)
H-AM 8	Tarrareoch (Remainder)	5.25	131
H-AM 9	Netherhouse Phase 1, R1A East	5.1	13 (73 built)
H-AM 10	Netherhouse Phase 1, R1B West	4.1	26 (79 built)
H-AM 11	Netherhouse (Remainder)	6.4	85 (under construction)
H-AM 14	Trees Farm	10.16	254
Total			749

Proposals Map 4 and the table in chapter 6 need to be amended to accommodate 1,000 units, but it should be as per the existing PPP masterplan and, it is contended, the new proposed masterplan.

The following amendments should be made to the table:

H-AM8

The effective area of H-AM 8 is much less than the 13.6 hectares identified in the table on page 80. The plan opposite illustrates the effective developable area of H-AM 8, which amounts to a total of only 5.1 hectares.

H-AM11

This site already has consent for 85 units and is under construction by Taylor Wimpey

H-AM14

The effective area of H-AM 14 is much less than the 26.6 hectares identified in the table on page 80. The plan opposite illustrates the effective developable area of H-AM 14, which amounts to a total of only 10.16 hectares.



Appendix 2 – Site Delivery Requirements for CDAs (p121)

Two of the requirements relating to Armadale are challenged:

New distributor road network serving the southern expansion of the town linking Lower Bathville to the A801 and B8084.

The current approved masterplan requires a strategic road connection to be constructed between Station Road and the A801. This objective of the WLLP 2009 is not disputed. However, the land use in the approved masterplan means that the road would have to be delivered to allow the employment land to be serviced.

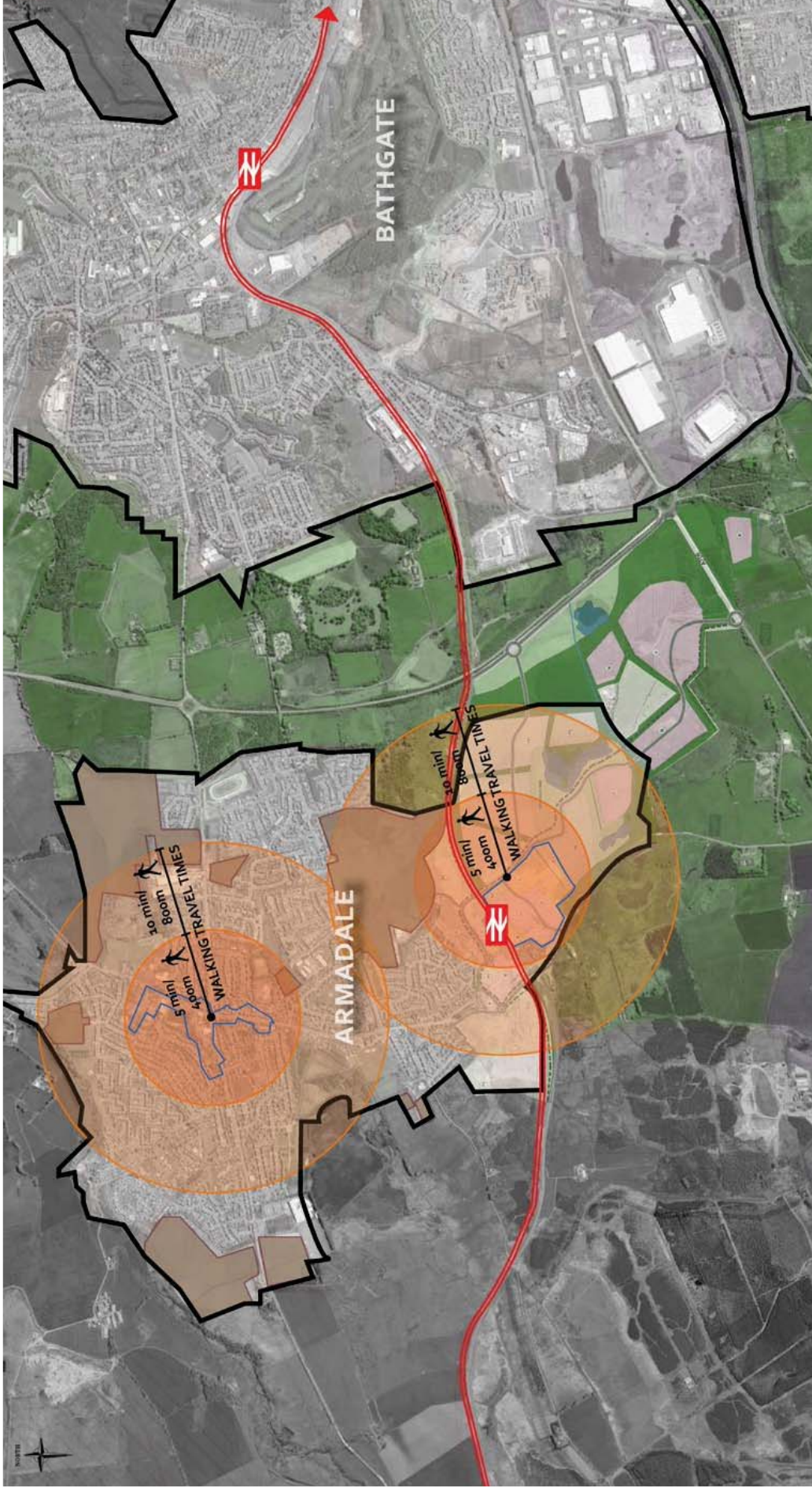
The cost of the link road and the roundabout on the A801 is approximately £3.5m. A recent bid to bring a major retail distribution centre to the site could have delivered the road, but the bid was ultimately unsuccessful. This potential employment use was highly specialised and no other end users are known to be in the market for such a site. The development of the employment land for smaller single site users will not generate sufficient value to pay for the link road.

The new proposed masterplan therefore proposes the employment land be relocated to the south of the existing allocation, thereby allowing the residential land to be focussed in the north. It is envisaged that the link road could then be delivered by the housing developments on either side of it, thereby minimising the length of unproductive road and associated abnormal cost.

Dualling the A801 between Boghead Roundabout and M8 Junction 4

Recent work by Southdale’s transportation consultant suggests that as a result of the new M8 junction at Heartlands that traffic patterns in the area have altered to the degree that the proposed Southdale development will no longer result in the dualling of the A801 being required.

10. SUSTAINABLE SOUTHDALE

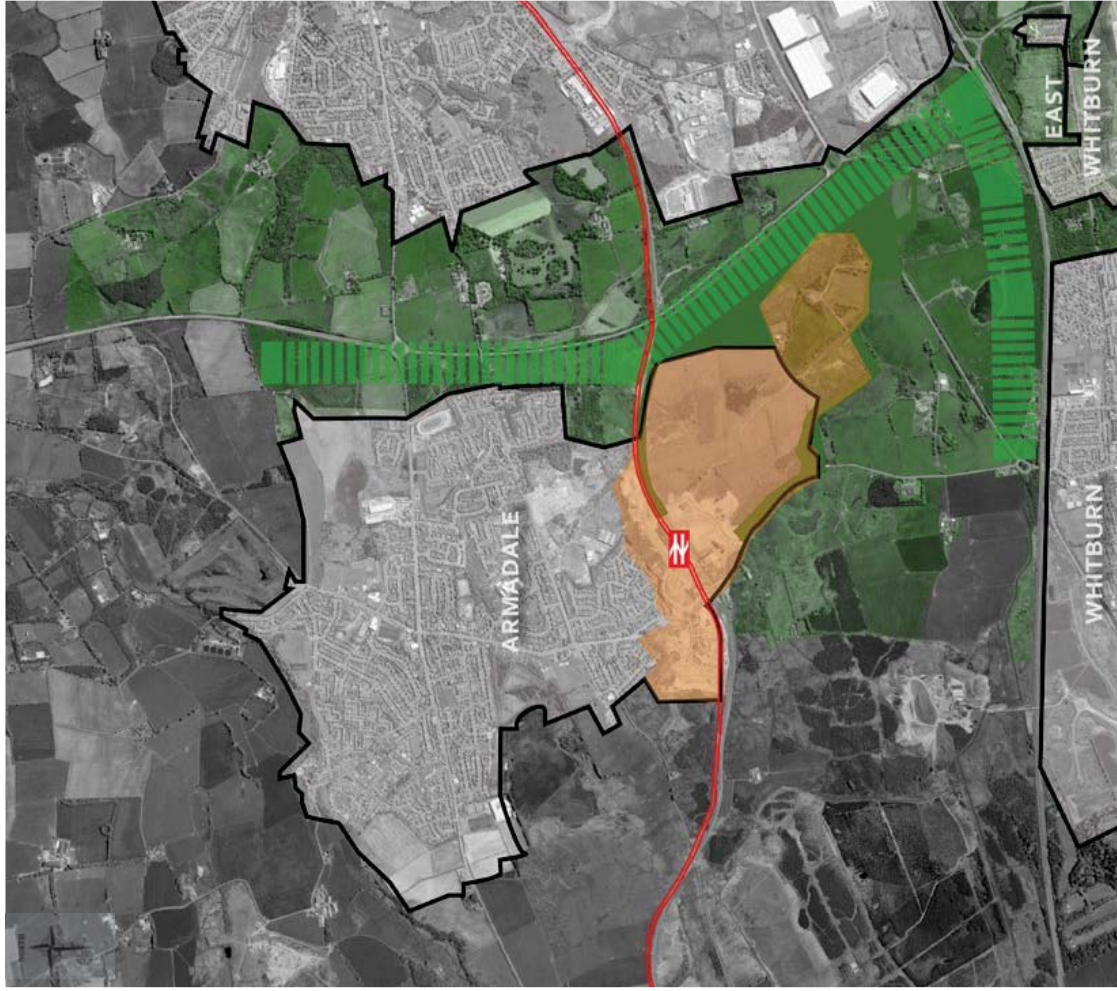




Settlement Boundary from proposals Map 4

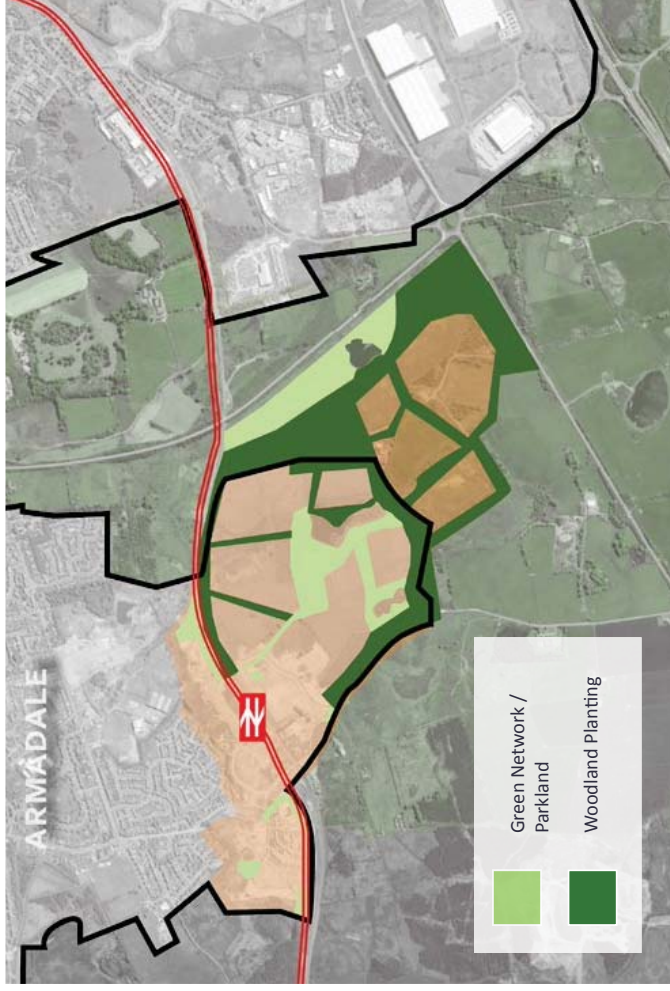
Local Centre Outline

Sustainability

The Council's response to Southdale's MIR submission advised that the site was not a sustainable location for development. Southdale has at its heart a railway station, park & ride, supermarket and emerging local centre. The Southdale development is very sustainable in locational terms. However, the masterplan illustrated in the MIR submission showed housing in the southern part of the unallocated land. In view of the Council's comments on the MIR submission, the housing has been relocated to be focussed in the northern part of the site (which is already allocated) around the new primary school, local centre, and railway station.



-  Settlement Boundary from proposals Map 4
-  Submission area
-  Countryside Belt from WLLP Map 4
-  Landscape Buffer



4. Countryside Belt & Coalescence Issue

The Council contended in its response to the Southdale MIR submission that development of the land to the south of the existing allocation would result in coalescence. The new proposed masterplan has scaled back the extent of developable land so that there is a significant distance between any development and the boundaries of the site. The distance is sufficient to allow the existing woodland to be augmented by a significant area of new community woodland.

Whilst the small scale of Proposals Map 4; Bathgate suggests that development to the south would disrupt the flow of the Countryside Belt, in reality the development would have little or no impact. Preliminary studies which will ultimately inform a Landscape and Visual Impact Assessment suggest that the topography and existing woodland is almost sufficient as it stands to ensure that the development would have little or no visual impact on the edge of Bathgate, the edge of Whitburn or views from the Countryside Belt or the M8 corridor.

It is important to note that the land to the south of the existing allocation was formerly an open-cast mine. The land has not been restored to agricultural quality in accordance with the terms of the planning permission for the open-cast mine, and there is therefore an argument that by granting consent on part of this land (approximately 50%), the remainder would be brought into beneficial use as an active community woodland. This is a circumstance that is particular to the Southdale site and it does not suggest a precedent for unrestricted development in the Countryside Belt.

A separate objection to the principle of the Countryside Belt policy has been submitted by Holder Planning.

12. GROUND CONDITIONS AND SITE SERVICING

Site History

The history of the Southdale southern expansion area has been extensively researched and the historical land uses can be summarised as agriculture and mining activity including surface opencast mining over portions of the site. Ground contamination from industrial activities and mining in particular is low to negligible and remediation is readily achievable through recognised and low intervention techniques such as clean, inert soil capping of affected areas, such as former colliery spoil mounds. The site history has not involved activity that would prevent development in accordance with the masterplan.

Ground Conditions

Ground conditions within the expansion area have been studied in detail and analysis carried out on an area by area basis. Areas of impact from former mining and opencast activity have been identified and the masterplan developed accordingly. Development activity remediation techniques in the form of grouting of shallow mineworkings, capping of mineshfts and stabilisation of areas of opencast backfill will be employed. The remediation techniques to be employed are development industry standard practice/procedures.

Earthworks and Site Preparation

Development platforming appropriate to the various use classes to provide landforms can be achieved without the need for import or export of materials from the site area and sustainable soil management techniques in order to maximise the re use of soil materials can be employed and has been employed to date on the existing development areas. Formalisation of techniques and procedures would be detailed within Construction and Environmental Management Plans (CEMPs) developed during the implementation stage.

Surface Water Drainage

Surface water drainage for the development areas will be designed and implemented in accordance with Sustainable Urban Drainage (SUDs) principles and techniques with levels of treatment and attenuation provided in accordance with the new CIRIA SUDs Manual, Sewers for Scotland 3rd Edition together with good development construction practices. Surface water attenuation to green field run off criteria agreed with West Lothian Council, Scottish Water and SEPA can be implemented with discharge to existing watercourses including the Boghead Burn. Surface water management train techniques providing source controls and treatment stages appropriate to the various development use classes can also be implemented and would included use of porous paving, filter drains, swales, detention basins and ponds as well as utilisation of existing water features within the site. SUDs techniques employed to date within the existing Southdale development areas have successfully delivered surface water management train objectives.

Flood Risk

There is no known flood risk within the expansion area which comprises a relatively self contained catchment area and for which the application of source controls and attenuation measures will not result in flood risk to areas downstream of the development area.

Foul Drainage

Foul drainage for the expansion area will be by means of a gravity system discharging to a low point within the site area and to a pumping station. The pumping station will be provided with storage provisions designed for the scale of development and with a rising main discharging to the existing Scottish Water network to the south. In keeping with normal development procedures, Drainage Impact Assessment (DIA) reporting will be completed in order to identify points of outfall and mitigation works required on the existing Scottish Water system. It is anticipated that the Whitburn Waste Water Treatment Works will be the receiving treatment works for the development.

Water Supply

Water supply will be from the Scottish Water network and it is noted that a 700 mm diameter ductile iron trunk water main terminates adjacent to Tippethill House on the B8084 on the western boundary of the site. 6 inch and 9 inch diameter distribution mains are also present in this location. Water Impact Assessment (WIA) reporting will be required in order to identify mitigation works required on the Scottish Water network in order to support the development however it is reasonable to assume that the presence of such large scale trunk water infrastructure in such close proximity to the site will limit mitigation works required.

Gas Supply

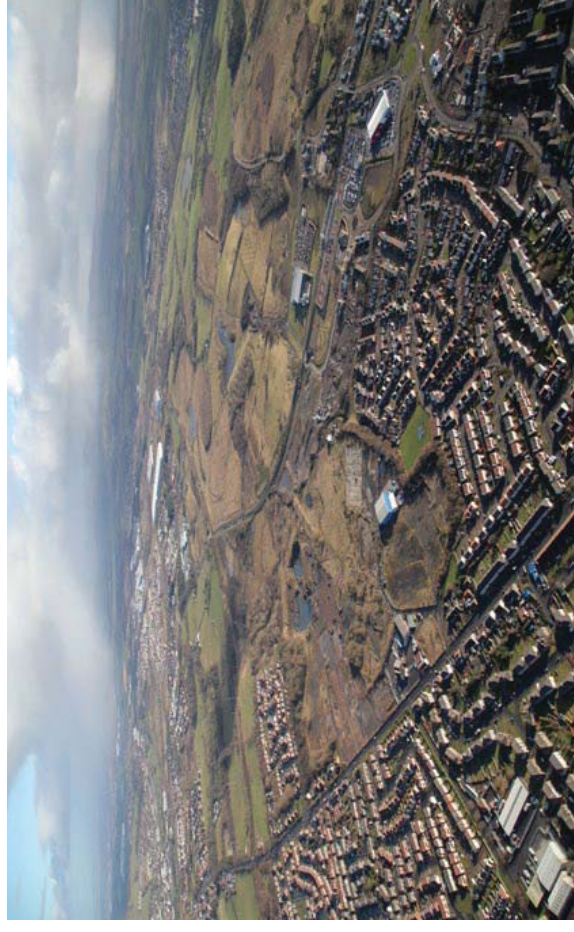
An intermediate pressure gas main is present in the east verge of the B8084 along the western boundary of the site and would provide the source for gas infrastructure to the site. Intermediate pressure is one step above medium pressure and therefore suggestive of adequacy of supply. Pressure reducing equipment will be required in order to step down to development supply pressures of medium and low pressure.

Electrical Supply

A network of 33kV and 11kV supplies exist in and around the site area and a new supply network will be feasible and extended into the development area. Development activity will include the placement below ground of overhead supply lines and a high voltage network established.

Access

Access for the expansion area will be taken from the road network consented for the current masterplan, extended and augmented as identified via the Transportation Assessment work which will support the expansion masterplan process.



13. CONCLUSION

Conclusion

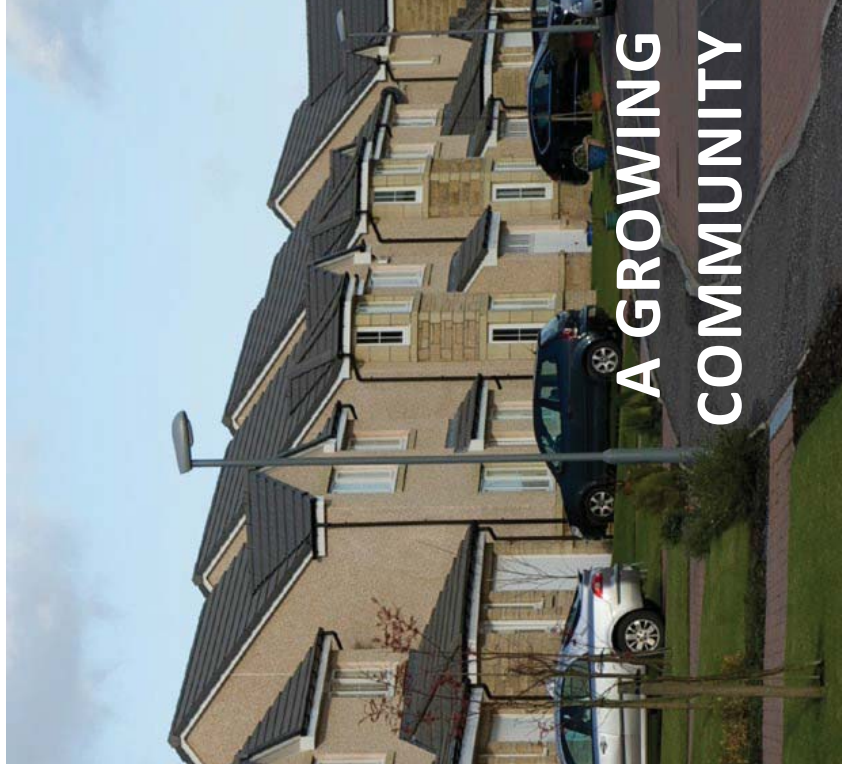
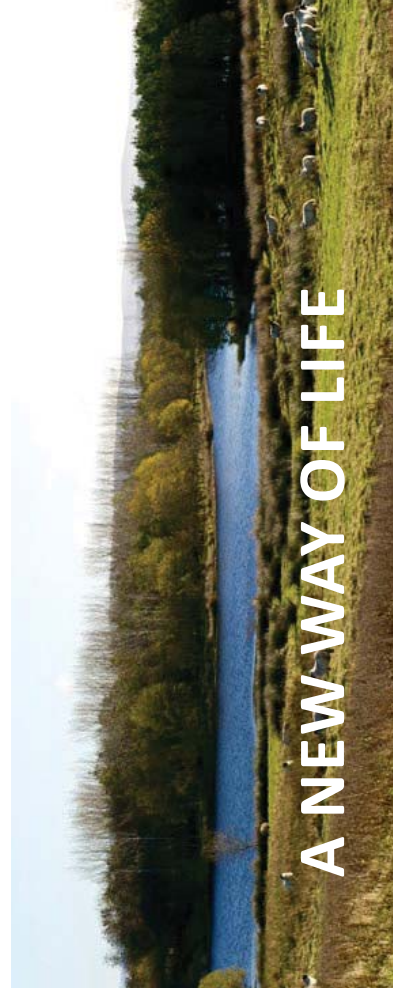
Southdale has been the most successful of West Lothian Council's Core Development Areas. This has been achieved by the landowner working closely with West Lothian Council, and by the landowner reinvesting all capital receipts from land sales into infrastructure and developer obligations.

The economic viability of the approved masterplan is no longer supportable because of various requirements of the WLLP 2009, including the requirements to remediate and service land for affordable houses, to pay an education contribution on the affordable houses, and to locate the employment land in an area which means that the necessary link road between Station Road and the A801 is unproductive and therefore a significant abnormal cost of development.

A new proposed masterplan which is economically viable has been presented in this document. The new masterplan requires that the employment land is located to the south of the current allocation and that 600 additional new homes are accommodated within the existing allocated area.

The benefits for the landowner, the Council and the community could be:

1. A deliverable masterplan which will address the key objectives of the Proposed LDP
2. Land for 600 affordable homes (37.5% of the total 1,600)
3. 1,000 homes for market sale, generating up to £20m for the local and national economy on completion (Scottish Economic Statistics 2007).
4. In addition to the 200+ jobs already created at Southdale, an additional 26.6 hectares of employment land in accordance with the Proposed LDP.





EMA Architecture + Design Limited
Chartered Architects
42 Charlotte Square
EDINBURGH EH2 4HQ
t 0131 247 1450
www.ema-architects.co.uk

