

BY EMAIL AND POST

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

25402/A1/CL/Im
20 November 2015

Dear Sir

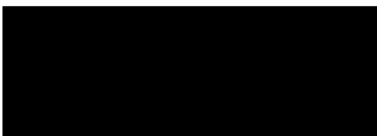
**WEST LOTHIAN LOCAL DEVELOPMENT PLAN
PROPOSED PLAN, OCTOBER 2015
REPRESENTATION – ARMADALE EAST**

We are instructed by Hallam Land Management Ltd to submit representations on the Proposed West Lothian Local Development Plan in respect of their site at Armadale East.

Accordingly, on behalf of our client, we enclose with this letter our Proposal Statement in respect of the site. We have also submitted our representations via the online Consultation Response Portal.

We would be pleased to discuss our submissions with the Council in more detail and should you require clarification of any matter, please do not hesitate to contact the undersigned. In the meantime, we would be grateful if you could confirm safe receipt of this letter and enclosures.

Yours faithfully



COLIN LAVETY
Planning Director

Enc



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Proposed West Lothian
Local Development Plan
Statement of Representations
Proposed Residential Development
at Armadale East

Prepared By

Barton Willmore

On Behalf of

Hallam Land Management Ltd

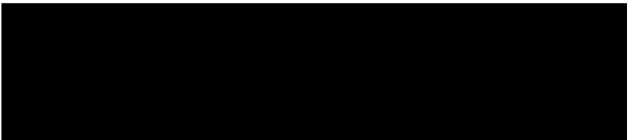
PROPOSED WEST LOTHIAN LOCAL DEVELOPMENT PLAN
STATEMENT OF REPRESENTATIONS
PROPOSED RESIDENTIAL DEVELOPMENT AT ARMADALE EAST

PREPARED BY
BARTON WILLMORE

ON BEHALF OF
HALLAM LAND MANAGEMENT LTD

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68/70 George Street
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Date: November 2015

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1.0 INTRODUCTION

- 1.1 Barton Willmore is instructed by Hallam Land Management Ltd. Hallam to submit this statement of representation to the Proposed West Lothian Local Development Plan.
- 1.2 Hallam own an area of land (14 ha) on the eastern side of Armadale (Please refer to red line boundary plan attached). Hallam consider the site to offer the opportunity to provide a logical residential extension to the existing settlement boundary, effectively rounding off development on the eastern side of Armadale.
- 1.3 Whilst Hallam also own land on the west side of Bathgate, the site at Armadale is being promoted as a single entity and entirely separate to the proposals for the Sibbalds Brae site at Bathgate.
- 1.4 There is potential to include a strong landscape framework as part of proposals which would ensure appropriate separation (visual and physical) between the eastern edge of Armadale and western edge of Bathgate, west of the A801 road.
- 1.5 Importantly, the site could assist West Lothian Council with the provision of much needed new housing in the short term.
- 1.6 A Concept Masterplan will be prepared for the site which will provide an indication as to the potential shape and form of development within the site and also how this will integrate with the existing settlement and surrounding countryside. This Masterplan will be progressed in conjunction with West Lothian Council and the local community.
- 1.7 Hallam seek the allocation of the site within the emerging LDP for residential development and for it's inclusion within the Armadale settlement boundary. There is strong housebuilder interest in the site and Hallam are confident that the site can deliver new homes relatively quickly in order to meet housing land requirements pre 2019.
- 1.8 Barton Willmore would welcome an opportunity to discuss these submissions with the Council and would wish to be informed of the Council's consideration of this and all other comments received in respect of the Proposed West Lothian Local Development Plan (LDP).

2.0 THE SITE AND ITS SURROUNDINGS

- 2.1 The site is located on the eastern side of Armadale. The site comprises fields and scrubland with some trees sporadically located across the site. There is an overhead electricity pylon on the eastern section of the site and further transmissions lines on wooden poles along the eastern boundary.
- 2.2 There is residential development and informal recreational land to the north of the site and residential allocations immediately to the west and south, currently being built out, which form part of the Armadale Core Development Area.
- 2.3 The Airdrie – Bathgate railway line forms the southern boundary to the site. The A801 Road forms the eastern site boundary. There are a number of Core Paths which skirt the site to the south, west and to the north, providing links with the wider area including Armadale train station.
- 2.4 Also, on the southern site boundary there is an employment allocation for business, storage and distribution uses.

3.0 PLANNING CONTEXT

Development Plan Context

- 3.1 The current development plan for the West Lothian Council area comprises the SESplan Strategic Development Plan (2013) (SDP) and the West Lothian Local Plan (2009). The Local Plan was prepared in the context of the previous Edinburgh and the Lothians Structure Plan and is increasingly out of date. Preparation of a new replacement Local Development Plan (LDP) is underway and sets out a spatial strategy for a ten year period from 2014 with a longer term framework for development beyond 2024. The LDP Main Issues Report was published in August 2014 and the Proposed LDP was published for consultation purposes in October 2015.
- 3.2 At a national level, planning policy and guidance is provided by Scottish Planning Policy (SPP) and a series of Planning Advice Notes (PANs).

Scottish Planning Policy

- 3.3 Scottish Planning Policy (SPP) (Paragraphs 27-29, Page 9-10) states in respect of sustainable development:

“This SPP introduces a presumption in favour of development that contributes to sustainable development.

- 3.4 This means that policies and decisions should be guided by the following principles:

- giving due weight to net economic benefit;
- responding to economic issues, challenges and opportunities, as outlined in local economic strategies;
- supporting good design and the six qualities of successful places;
- making efficient use of existing capacities of land, buildings and infrastructure including supporting town centre and regeneration priorities;
- supporting delivery of accessible housing, business, retailing and leisure development;
- supporting delivery of infrastructure, for example transport, education, energy, digital and water;

- supporting climate change mitigation and adaptation including taking account of flood risk;
- improving health and well-being by offering opportunities for social interaction and physical activity, including sport and recreation;
- having regard to the principles for sustainable land use set out in the Land Use Strategy;
- protecting, enhancing and promoting access to cultural heritage, including the historic environment;
- protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment;
- reducing waste, facilitating its management and promoting resource recovery; and
- avoiding over-development, protecting the amenity of new and existing development and considering the implications of development for water, air and soil quality.”

3.5 SPP (Paragraph 30, Pages 10-11) outlines the role that development plans should play in the process of supporting new development in their area:

“Development plans should:

- be consistent with the policies set out in this SPP, including the presumption in favour of development that contributes to sustainable development;
- 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;
- support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area;
- be up-to-date, place-based and enabling with a spatial strategy that is implemented through policies and proposals; and
- set out a spatial strategy which is both sustainable and deliverable, providing confidence to stakeholders that the outcomes can be achieved.”

3.6 SPP (Paragraph 110, Page 27) outlines how housing need should be met in Scotland through the planning system:

- “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;
- 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.”

3.7 SPP (Paragraph 122, Page 29) states 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.”

3.8 SPP (Paragraph 125, Page 31) states that:

“Planning authorities, developers, service providers and other partners in housing provision should work together to ensure a continuing supply of effective land and to deliver housing, taking a flexible and realistic approach. Where a shortfall in the 5-year effective housing land supply emerges, development plan policies for the supply of housing land will not be considered up-to-date.”

4.0 VISION STATEMENT AND AIMS

- 4.1 We note that the LDP Vision is in the first instance informed by that of the Strategic Development Plan (SDP) for Edinburgh and South East Scotland (emphasis added).
- 4.2 In relation to sustainable housing locations, we also note that the Vision seeks to provide a generous supply of housing land and an effective five year housing land supply at all times (emphasis added).
- 4.3 We maintain that it will be crucial in progressing the LDP, to ensure it is compliant with the approved SDP and that in accommodating the growing West Lothian population and anticipated improved employment position, sufficient housing is delivered, timeously and in accordance with SDP requirements.**

5.0 SPATIAL STRATEGY

Housing Land Requirements for LDP

- 5.1 We note that West Lothian's population is predicted to increase by nearly 4% by 2020 to 183,000 compared with the projected increase in population for Scotland as a whole of around 3% during the same period. We also note that the number of households in West Lothian is also projected to increase with a 17% increase anticipated between 2012 and 2037.
- 5.2 The LDP has been prepared in the context of the SESplan SDP, approved by Scottish Ministers in June 2013, and SPP 2014. We note that West Lothian Council acknowledges that to meet the SDP requirements, the level of house completions across the plan area will need to go well above recent rates of housing completions.
- 5.3 The LDP spatial strategy continues to support the previously established CDA allocations although it acknowledges that further land allocations for development are also required in order to meet SESplan requirements in full.
- 5.4 Despite the above acknowledgements, we have concerns about the Council's continued reliance on sites from the previous Local Plan (2009) which have failed to come forward and deliver new housing and which are simply continued into the new LDP with no guarantee of delivery during the lifetime of the plan. This, despite the Council's acknowledgement that the LDP is running a shortfall of 3,623 units to 2019 which is contrary to Scottish Government policy and SESplan.
- 5.5 There is a case for revisiting the merits of continuing to include sites which have been identified in the previous Local Plan (2009), if these sites are still not likely to assist in meeting requirements by 2019. Importantly, the recently published Report of Examination into objections to the Scottish Borders LDP made it clear that sites not likely to come forward, where constraints indicate that development is unlikely to come forward, should be deleted from that plan.
- 5.6 It is critical that, in order to ensure compliance with SPP and the maintenance of an effective housing land supply at all times, West Lothian Council identifies additional housing sites that can contribute effectively to the housing land supply and that have a realistic opportunity of coming forward within the necessary timescale. i.e. upto 2019.**

- 5.7 We maintain that there is a need to revisit the proposed allocation of sites in the LDP, carried forward from the Local Plan, and to replace or augment these with further sites that will be capable of delivering units to meet requirements in the first five year period of the plan. We refer West Lothian Council to the site on the eastern side of Armadale, promoted by Hallam and respectfully request that this site is identified as a housing site that can contribute to the Housing Land requirement up to 2019 and also to 2024.**
- 5.8 (Please see Table below which demonstrate the effectiveness of this site in accordance with PAN 2/2010: 'Affordable Housing and Housing Land Audits).
- 5.9 SESplan Policy 6 Housing Land Flexibility requires each planning authority to maintain a five year effective housing land supply at all times. Even with the reliance on sites in the second period of the LDP, this results in a surplus of only 33 units to 2024 according to West Lothian Council. This marginal figure does not provide stakeholders and interested parties with the confidence needed to ensure that the plan will ultimately deliver the necessary housing or provide the necessary supply of effective sites at all times.
- 5.10 The Proposed LDP fails to comply with SESplan by not providing sufficient effective housing land in the first period of the plan. It is not appropriate to simply allocate 'sufficient' land up to year 10 rather than the SESplan requirements for 2019 and 2024.
- 5.11 We therefore object to the Council's approach to housing land supply applied in the LDP and to the Supply target that the Council sets out in Figure 5: West Lothian Housing Land Supply Target.**
- 5.12 The Proposed LDP identifies that a new SDP (SDP2) is currently being prepared and is at Main Issues Report stage. A new Housing Needs and Demand Assessment (HNDA2) has recently been published and is to inform the housing land requirement for SDP2. This, according to WLC includes more up to date housing projections and that it shows that housing need is expected to be around 40% less. Additionally, WLC reports that HNDA2 identifies that a much higher percentage of housing demand in West Lothian will be for rented housing rather than owner occupied housing.
- 5.13 The Proposed Plan (paragraph 5.41) states that the LDP must start to recognise the changing demand for housing both in terms of tenure and scale flagged up by HNDA2. It goes on to state that '...the most up to date demand figures will be used to calculate the five year housing land requirement in the context of a revised housing land audit process

which will compare supply and demand in each sector than as a single figure as has been the case until now.'

- 5.14 We would wish to draw the Council's attention the recently published Report of Examination in to objections to the Scottish Borders Council LDP.
- 5.15 In this Report of Examination, The Reporter states (Paragraph 24, page 386): 'I note also the Council's reference to the likely reduction in future housing land requirement which appears to be emerging from HNDA2. I am in no doubt, however, that the plan ought to be consistent with the currently approved version of SESplan and its supplementary guidance.' (emphasis added)
- 5.16 We have strong reservations about the approach being pursued by WLC which we consider is not in accordance with the approved SDP. We therefore object to West Lothian Council relying upon HNDA2 to calculate the five year land supply figures for the LDP. As referenced in the recent Scottish Borders LDP Examination report, the LDP must be consistent with SESplan (including its supplementary guidance).**

Policy Hou1 Allocated Housing Sites

- 5.17 To accord with Scottish Government Policy, the second paragraph in Policy Hou1 should be rephrased by inserting the words 'at all times' after 'supply of housing land'. The sentence should read as follows:
- '...to ensure that an effective 5 year supply of housing land at all times is maintained over the plan period, proposals for uses other than housing....'

6.0 LDP APPENDIX 2: SCHEDULE OF HOUSING SITES – ARMADALE EAST

- 6.1 The Hallam site at Armadale East has an indicative capacity of 145 units based on 25 dph. This site would deliver a sustainable new neighbourhood including for a range of house types and tenures as well as open space and green networks linking with the wider area including footpath/ cycleways linking with Armadale train station to the south west.
- 6.2 The allocation of the site for residential development would assist West Lothian Council in meeting housing requirements and maintaining the necessary continuous, minimum five year supply of effective housing land, without comprising areas important for their qualities in respect of landscape, the natural and built environment.
- 6.3 The proposals can assist in meeting affordable housing contributions in accordance with Policy Hou5 Affordable Housing. Armadale is identified as a Priority 2 area with a 15% affordable housing requirement and the allocation of the site for residential development would ensure the provision of affordable housing as an integral part of any future new neighbourhood.
- 6.4 The site has distinct advantages for the provision of new residential development. These can be summarised as follows:
- The site is well located in relation to existing residential development within Armadale;
 - Development of the site for housing would assist the council in ensuring that it meets its obligation to provide a continuous minimum 5 year effective housing land supply;
 - Existing local bus services are accessible from the site providing connections to Armadale and Bathgate town centres, Livingston and beyond;
 - The site can be easily integrated into existing and potential footpath/ cycleway networks;
 - Local community facilities are within walking distance;
 - Vehicular and pedestrian access to and from the site can be adequately provided;
 - The proposals include for the provision of range of housing types and mix of tenures including affordable housing;
 - Potential for implementation of a Landscape framework to ensure, in perpetuity, a landscape corridor to provide visual and physical separation between the eastern edge of Armadale and Bathgate;

- Development of the site for residential development effectively rounds off the Armadale settlement on its eastern side;
- 6.5 The site is surrounded by housing to the north and residential allocations immediately to the west and south, currently being built out as part of the Armadale CDA. There is also employment land to the south of the site.
- 6.6 The development of the site for housing and associated landscaping provides a natural rounding off of the settlement on the eastern edge. The provision of a robust landscape framework as part of the proposals protects the settlement edge and secures a permanent separation/ green corridor to safeguard against coalescence with Bathgate to the east.

Effectiveness of the Site

- 6.7 The Scottish Government’s first and foremost priority in relation to housing delivery, is to plan for a generous and effective land supply, ensuring flexibility within the development plan in recognition of present economic times as outlined in Scottish Planning Policy (SPP).
- 6.8 SPP promotes the provision of a range of effective housing sites (Paragraph 119, Page 29) as well as the provision of 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 at all time’ (Paragraph 110, Page 27).
- 6.9 The requirement to maintain an effective housing land supply as set out in SPP is complemented by PAN 2/2010: ‘Affordable Housing and Housing Land Audits’. This sets out criteria to identify housing sites that can be successfully brought forward through the planning system (PAN 2/2010, Paragraph 55, Page 17).
- 6.10 For the purposes of this LDP submission, the seven specified criteria, outlined in PAN 2/2010, have been used to assess the effectiveness of the site for housing, as detailed below:

Effectiveness Criteria	Land at Armadale East
Ownership- the site is in the ownership or control of a party which can be expected to develop it or release it for development.	The Site is within the ownership of Hallam Land Management Ltd and is being promoted as suitable for development. There is keen interest from housebuilders in the site and the proposals.

Physical- the market is strong enough to fund the remedial work required.	The Site is not physically constrained and is capable of accommodating the proposed development.
Contamination- previous use has not resulted in contamination of the site or, if it has, commitments have been made which would allow it to be developed to provide marketable housing.	The site comprises fields and scrubland with some trees sporadically located across the site. The site has not been previously developed and is not expected to be subject to ground source contamination on site. Intrusive investigations will be undertaken to confirm that there is no contamination present or if there is that this can be appropriately addressed in order to allow development to take place.
Deficit funding- any public funding required to make residential development economically viable is committed by the public bodies concerned.	No requirement for public funding for the Proposed Development. Hallam is committed to providing the 'affordable housing' contribution in accordance with adopted policy.
Marketability- the site or a relevant part of it can be developed in the period under consideration.	The Site can be developed in a phased manner as appropriate. The site can contribute to maintaining the Council's five year effective housing land supply at all times.
Infrastructure- any required infrastructure can be provided realistically by the developer or another party.	The Site does not suffer from any insurmountable infrastructural constraints. Required infrastructure can be provided by the developer to allow development to proceed.
Land use- housing is the sole preferred use of land in planning terms, or if housing is one of a range of possible uses other factors such as ownership and marketability to housing being a realistic option.	The Site is appropriate for housing. Importantly, housing would be deliverable within the effective five year period, to meet an established need in terms of housing delivery. There is keen interest from housebuilders in the site and the proposals. Hallam seek to promote development which includes for a wide range of house types and tenures ensuring a socially inclusive development.

6.11 Using the seven criteria of effectiveness defined in PAN 2/2010, it is clear that the Site is, effective and, thus, capable of delivering housing units on-site in the short term.

6.12 We respectfully request that the site as identified in the attached site plan is identified as a housing allocation in the LDP and included as a Housing site in the Schedule of Housing Sites in Appendix Two of the LDP.

7.0 COUNTRYSIDE BELT DESIGNATION

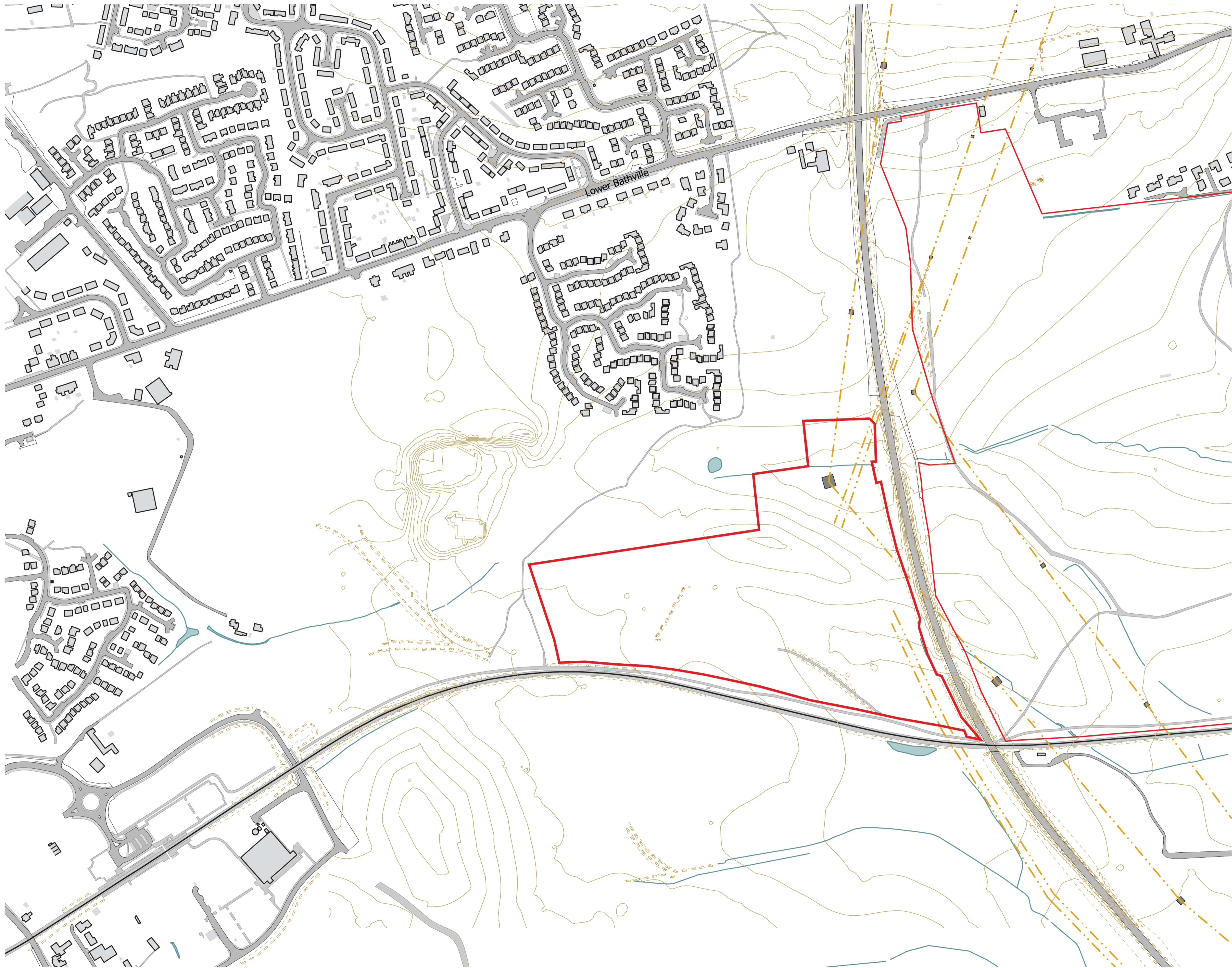
- 7.1 The site is shown as part of the Countryside Belt in the Proposed LDP. According to the Proposed LDP, Countryside Belts are spatial designations for the purposes of controlling urban spread into the countryside. A key purpose is to maintain the identity of towns by avoiding coalescence. Protecting the setting of settlements is another important purpose of Countryside Belts and they are to provide access to informal green space.
- 7.2 There would be no coalescence between Armadale and Bathgate (physical or visual) as a result of the proposals and a robust landscape corridor, to the east of the proposed built development on land owned by Hallam, can be delivered in perpetuity to the benefit of existing and new residents with existing and proposed landscape features brought under positive ongoing management.
- 7.3 **We maintain that the site on the eastern edge of the existing Armadale settlement should be excluded from the Countryside Belt and included as part of the settlement boundary. Future Masterplan proposals would ensure there would be no coalescence between Armadale and Bathgate and that a robust landscape corridor could be provided and maintained in perpetuity on the eastern side of the site, between Armadale and Bathgate.**
- 7.4 **We therefore object to the identification of Countryside Belt covering the site and request that the site is included within the Armadale settlement boundary and excluded from the Countryside Belt.**

8.0 PROPOSALS MAP 1 – WEST LOTHIAN AND MAP 4 – BATHGATE AREA

- 8.1 We respectfully request that the settlement boundary for Armadale is amended on Proposals Maps 1 and 4 of the Proposed Local Development Plan to include the Armadale East site, owned by Hallam Land Management Ltd, as part of the settlement. (Please refer to redline boundary for recommended site boundary)

APPENDIX ONE

RED LINE BOUNDARY PLAN



Project
Armadale East

Drawing Title
Red Line Boundary

Date
20.11.15
Project No
25402

Scale
1:2500
Drawing No
Acad 01

Drawn by
BB

Check by
MW

Revision
-

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