

Your details (mandatory)

Please indicate in what capacity you are making this submission:

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

Please complete the following contact information:

Name

Email

Telephone

Address

Organisation name

Client's name

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

- Yes No

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

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

Enter EOI (Expression of Interest) reference here

Enter MIRQ (*Main Issues Report*) reference here

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

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

Signature Date

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Proposed Plan reference

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

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

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

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

Settlement	<input type="text"/>		
Site address / location	<input type="text"/>		
Site Ref	<input type="text"/>	Page nos.	<input type="text"/>

Please see attached submission.

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Please see attached submission.

Additional comments

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

Please see attached submission.

West Lothian Local Development Plan Main Issues Report

On behalf of

Manse LLP

Gregory Road, Livingston

17th October 2014

HolderPlanning

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1. Introduction

- 1.1 The following submission has been prepared on behalf of Manse LLP and Royal London Asset Management (RLAM) in response to the West Lothian Local Development Plan Main Issues Report (MIR).
- 1.2 Manse is a privately owned property investment and development company, based in Edinburgh. Over recent years, Manse has established a strong track record in the delivery of residential and mixed use development projects within Scotland and in the north of England.
- 1.3 This submission supports the allocation for housing of two adjacent sites on either side of Gregory Road, Livingston in the Proposed Local Development Plan (LDP). The two sites are identified on MIR Map 6 South Livingston with references ELv48 (Gregory Road West) and ELv46 (Gregory Road East). Gregory Road West is approximately 8.4 hectares in size and Gregory Road East measures 3.69 hectares. The sites are identified on Map 6 as committed employment sites.
- 1.4 The sites are owned by RLAM as part of their wider portfolio of ownerships in the area. Having owned the land for some time with little prospect emerging of viable development for their allocated use, RLAM have agreed to work in partnership with Manse LLP in seeking to promote the use of the sites for residential development.
- 1.5 It should be noted that the owners of the site were not aware of the Council's 'Expression of Interest' exercise undertaken in 2011, and so the subject sites have not previously been brought to the attention of the Council.
- 1.6 This representation should be read in conjunction with our representation on housing supply and demand issues, which considers the context set by SESplan and its Supplementary Guidance in terms of the housing requirements for West Lothian and the housing supply position set out in the MIR. This concludes that there do not appear to be enough Preferred Sites for housing identified in the MIR to meet the Housing Supply Target in the two periods identified by SESplan i.e. 2009 – 2019 and 2019 – 2024.
- 1.7 In our view, the sites at Gregory Road, within the existing urban area of Livingston, are well placed to assist in meeting this apparent shortfall in identified housing sites.

2. SESplan

- 2.1 Scottish Ministers approved SESplan with modifications on the 23rd June 2013. As a result, SESplan as modified constitutes the strategic development plan for the South East Scotland Strategic Development Plan and sets the context for the emerging West Lothian Local Development Plan.
- 2.2 SESplan identifies the whole of West Lothian as a Strategic Development Area (SDA). As indicated in paragraphs 26 and 113 of SESplan, priority will be given to housing development on brownfield sites and land within SDAs.
- 2.3 The subject sites are both brownfield and lie within the West Lothian SDA. The sites have been serviced by the Livingston Development Corporation and currently comprise and have the appearance of wasteland.

3. The West Lothian Main Issues Report

3.1 The MIR, as it should, identifies Preferred Sites and Reasonable Alternative Sites for housing. Our understanding is that this consideration has been based largely upon the Council's request in 2011 to landowners and developers to indicate the availability of specific sites for development. As indicated above, the owners of the Gregory Road sites were not aware of this request and hence the sites were not brought to the Council's attention then.

3.2 A meeting to discuss the sites' availability for housing was discussed with the Council in March 2014, at which they were advised by the planning officer that it was then too late to refer to the sites within the MIR. However, Manse LLP was encouraged to respond to the MIR in support of the sites' allocation for housing in the Proposed LDP.

3.3 We are aware that a great deal of work has been undertaken by the Council in assessing the suitability of many sites for development, and understand that to date the subject sites have not been considered in this context. The purpose of this submission, therefore, is to provide information that will assist the Council in assessing its merits. We would very much welcome further discussion with the Council on the potential for allocating the sites for housing development and Manse LLP will be happy to provide any further information that might be required.

3.4 On page 153 of the MIR, there is a description of Livingston and its characteristics. It is noted that the town is the West Lothian's administrative centre and performs a key role as a retail and employment centre. The town is served by 2 railway stations and has excellent communications in a very strategic location.

3.5 There is a lengthy commentary on infrastructure considerations, which suggests that there are no major constraints to further development, albeit the pressures on local schools are described.

3.6 Under the heading of 'Employment Land', the following is stated:

"There are significant levels of employment land available for development in Livingston, which require to be reviewed to ensure they are the right location and remain fit for purpose".

3.7 Under the heading of 'Housing Land', it goes on to say:

"The amount of available housing site allocations has reduced in recent years as the town matures and develops. However, in addition to the allocations at the West Livingston CDA there are opportunities now arising that could potentially contribute to the housing land supply from the existing employment land supply as additional employment land in the CDA in particular comes forward."

3.8 The section concludes by stating that:

“The availability of infrastructure, strategic location, and existing facilities make the town an attractive option for development”

4. Site Assessment

- 4.1 As described above, the sites can currently be characterised as wasteland, and can be defined as brownfield by virtue of having been serviced for development.
- 4.2 The sites are allocated for employment in the adopted West Lothian Local Plan 2009:
- Elv46 Gregory Road east; and
 - Elv48 Gregory Road west
- 4.3 The sites form part of the extension to Kirkton Campus and are located to the east of the West Livingston/Mossend CDA. The Plan explains that the Campus is characterised by low density, high quality buildings, set within extensive landscaping. Appendix 5.1 categorises the sites as 'Class C' high amenity use classes 4 and 5.
- 4.4 We agree with the statement in the MIR that there is an opportunity to utilise existing employment sites for housing development. In this particular case, the sites have been allocated for employment use for a number of years. Realistically, there is no prospect of them coming forward for such use in the foreseeable future. This is also in the context that there is currently an over-supply of employment land in Livingston, and the fact that additional land for such use is identified in the existing Core Development Areas, which are likely to be more attractive to potential occupiers.

Suitability for Housing

- 4.5 Livingston is West Lothian's principal town and is located within one of SESplan's Strategic Development Areas. The subject sites are located within the urban area and are within walking distance of local services and facilities. Whilst other proposed housing sites in West Lothian are constrained by education capacity, the sites are located within a local catchment where capacity is available.
- 4.6 The sites are extremely well connected by public transport and there are bus stops at both ends of Gregory Road, which have a choice of regular buses (First Group and Horsburgh Coaches), connecting the area with Livingston Town Centre, Edinburgh and Glasgow. Moreover, the sites are within walking distance of employment opportunities in Kirkton Campus.
- 4.7 The proposed development offers an opportunity to create a new, distinctive residential development in a sustainable location. Allocating the sites for housing will enhance the character of the area, by bringing unused sites back into use and will create a genuinely mixed use environment.

5. Description of Proposals

5.1 Both sites present an opportunity for development in a sustainable location in terms of proximity to:

- 5.1.1 Strategic foot and cycle path networks
- 5.1.2 Easy access via the strategic foot and cycle path networks to the major employment centres of Kirkton Campus to the north and Brucefield Industrial Estate to the south
- 5.1.3 Easy access to local amenities in Livingston Village to the north
- 5.1.4 Easy access via the strategic foot and cycle paths to the town centre a short walk to the east, including the major shopping centre and West Lothian College
- 5.1.5 The James Young High School is 1.4 miles away by foot to the east, using in part the strategic foot and cycle path network and in part the residential neighbourhoods of Dedridge. West Calder High School is 1.6 miles away by foot to the west.
- 5.1.6 Livingston Village Primary School is 1 mile to the north, while other primary schools in Livingston are readily accessible further afield.

5.2 The capacity for new housing is significant, amounting to almost 300 units between both sites, assuming a broad mix of accommodation from 2 bed terraced houses to 5 bedroom detached houses. Site A (to the east) has a capacity for approximately 90 new homes, including affordable housing. Site B (to the west) has a capacity for approximately 195 new homes, including affordable housing.

5.3 Indicative layouts have been prepared for both sites to illustrate how they could be designed to:

- 5.3.1 Create new neighbourhoods with a sense of place and an identity specific to this part of Livingston, creating frontage and enclosure where appropriate.
- 5.3.2 Retain and reinforce the existing landscape structure. In the case of the western site, trees that predate the development of this part of Livingston would be retained in a central park area, connected to perimeter woodland planting by a new Green Network. In the case of the eastern site, block woodland that provides a defensible boundary and containment to the west would be retained, with new block woodland planted to the north and east.
- 5.3.3 Integrate fully with adjacent strategic footpath links which connect the sites to the extensive community facilities and employment and retail opportunities in Livingston.

6. Site Effectiveness

6.1 In line with Scottish Planning Policy, the Local Development Plan should only allocate land for housing which is effective or capable of becoming effective. We can confirm that the subject sites meet the necessary criteria in this respect, as follows:

Ownership: the site is controlled by parties who will actively promote the site for the development of housing, which can be delivered in the early part of the plan period. Manse LLP is highly experienced in bringing forward residential development, with various recent project undertaken at locations from the north east of Scotland down to Teesside in England. This has given Manse a strong understanding of the residential development market and excellent relationships with housing and mixed use developers.

Physical: there are no known physical constraints that would prevent the site's development.

Public Funding: no public funding would be required to make residential development viable. This is a private housing site controlled by a developer.

Marketability: there are no delivery constraints affecting the site. Livingston has a strong housing market and there is no doubt that housing in this location would be in demand.

Infrastructure: there are no infrastructure constraints. Water supply, foul drainage, educational capacity, electricity and telecoms are all either available or can be provided by the developer.

Land Use: Housing (private and affordable) will be the primary use of the land.



**AREA B
(APPROX 195)**

**AREA A
(APPROX 90)**



ema
ARCHITECTURE + DESIGN

MANSE LLP
GREGORY ROAD
LIVINGSTON

MIR SUBMISSION
INDICATIVE LAYOUT

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