

Our Ref: JS/LEC LP/S/615/PL

17 October 2014

Development Planning  
West Lothian Council  
County Buildings  
High Street  
Linlithgow  
West Lothian  
EH49 7EZ

Dear Sir/Madam

## **WEST LOTHIAN LOCAL DEVELOPMENT PLAN - MAIN ISSUES REPORT**

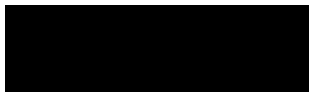
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Banks Property support the more flexible approach to the range of uses that can be provided on existing employment land, as outlined in Main Issue 1: Economic Development and Growth. Banks Property consider the Pond site in Bathgate to provide a suitable opportunity for alternative uses and a site that can contribute to housing land supply targets, specifically providing a quality living environment for the elderly. This provides support for Main Issue 3: Housing Growth, Delivery and Sustainable Housing Locations.

A supporting statement has been provided along with a number of appendices. An indicative masterplan has been prepared to demonstrate the retirement village concept and is appended to this representation. This approach has been endorsed and supported by an established provider of housing targeted for elderly people, Bield Housing and Care.

Please can you acknowledge receipt of this representation. We would welcome the opportunity to discuss our proposals for the Pond site in more detail and would appreciate being kept informed on progress of the Local Development Plan.

Yours faithfully



**James Seabury**  
Senior Development Planner

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## WEST LOTHIAN LOCAL DEVELOPMENT PLAN

### MAIN ISSUES REPORT: BANKS PROPERTY RESPONSE

#### **Pond Industrial Estate, Bathgate**

This representation to the Main Issues Report seeks to obtain an allocation in the West Lothian Local Development Plan for a sustainable retirement village covering approximately 16 hectares of existing industrial land at the Pond Industrial Estate, Bathgate.

#### **Site Setting**

The proposed development site is located to the south west of Bathgate within the settlement boundary, at the gateway to the town from the M8. The site is bounded to the west by the B7002 Whitburn Road, which leads directly into Bathgate town centre.

The south of the site is bounded by the A7066 which leads to the eastern side of Bathgate and provides access to the strategic Whitehill Industrial Estate Area and the Wester Inch masterplan area.

The B7002 sweeps round to define the northern edge of the site. To the north of the road is a preferred new allocation in the LDP covering 6.5 hectares for a mixed used site on the former Abbatoir.

To the east of the site is a further area of industrial land with an area of new housing to the south east and larger areas of new housing allocated further east at Wester Inch.

#### **Site Location**

The site itself covers approximately 16 hectares of land. A location plan has been provided in appendix a). The site is currently occupied by a waste recycling operation, Scotwaste who collect, treat and recycle waste material.

There is a substantial amount of woodland planting on the southern and eastern boundaries of the site. There are water courses present on the site including Boghead Burn which runs along the northern edge of the site.

#### **Current Development Plan**

##### Strategic Development Plan for South East Scotland (SESplan) (2013)

The Strategic Development Plan identifies 13 Strategic Development Areas (SDAs) acting as primary locations for growth and investment. The whole of the West Lothian Council area is identified as a strategic development area, demonstrating that there are no strategic constraints on the location of new development.

Paragraph 113 of the SDP outlines the approach that should be taken for allocating additional housing land. It states that priority in allocating new sites for housing development should be given to brownfield sites within existing built up areas. Where additional land is required, sites should first be sought within the 13 SDAs to assist in implementing the plans locational strategy.

The Pond site is brownfield and located within the West Lothian SDA. Subject to consideration of the loss of employment land, the retirement village concept which will provide additional housing land on a brownfield site within an SDA is supported by policy 1A (Spatial Strategy: Development Locations) and policy 5 (Housing Land) and will help to deliver the SDP's spatial strategy.

### West Lothian Local Plan

The site lies within an employment area boundary in the adopted West Lothian Local Plan (2009) with a presumption against uses other than classes 4, 5 and 6 unless there is a clear demonstration of their direct benefit to those working in the employment area.

The most southerly part of the site is safeguarded for open space. Proposals resulting in the loss of open space will be resisted and assessed against the locational justification for the development, the importance of the open space for recreation or amenity, the disturbance and loss of trees, woodlands and wildlife habitats or green corridors and the availability and accessibility of alternative suitable open space.

It is acknowledged that the proposal is contrary to the employment policies contained within the existing West Lothian Local Plan.

## **Loss of Employment Land**

### Strategic Development Plan

SDP Policy 2 requires Local Development Plans to support the delivery of the quantity of the strategic employment land supply specified. A range and choice of marketable sites equating to 123 hectares are required to be provided in West Lothian.

The Economy Technical Note provides a breakdown of the strategic employment sites that meet the figures provided within SDP Policy 2. The Pond Industrial Park is not included within the sites identified in the technical note.

Paragraph 95 of the Strategic Development Plan states that whilst housing and retail development on strategic employment sites would normally be resisted, the development of mixed use communities on strategic employment sites may be appropriate provided this is justified through an LDP and does not result in a net loss to the overall strategic employment land supply.

### Local Development Plan

Table 10 in the Economy background paper that supports the Main Issues Report reaffirms the allocated strategic employment sites within West Lothian, as set out in the SDP Economy Technical Note. Table 11 includes further Core Development Area employment land allocations

equating to an additional 150 hectares of employment land. The Pond Industrial Park is not one of the sites included in table 10 or 11 of the background paper.

The preferred approach set out within the Main Issues Report for Main Issue 1: Economic Development and Growth represents a significant change from existing employment policies included within the adopted West Lothian Local Plan (2009).

The preferred option outlines a more flexible approach to employment land including;

- Review the range of uses which could be accommodated on employment land to accommodate a more flexible approach
- Allowing a wider range of uses on currently allocated employment sites at locations to be identified in the LDP
- In a limited number of cases, existing employment land is identified as being suitable for potential residential development

The preferred approach recognises the importance of having a flexible approach to employment land where appropriate. The Pond site is not a strategic employment site that contributes to the employment land figures set out in the Strategic Development Plan.

The Main Issues Report provides a range and choice of marketable sites to meet anticipated economic development requirements. The Pond site provides a small contribution to the employment land provided in Bathgate and West Lothian and its reallocation for alternative uses will not affect strategic employment land provision.

## **Open Space Proposal**

No details relating to the open space proposal on the southern edge of the site are included within the West Lothian Local Plan (2009). The proposal covers the existing woodland on the southern boundary. The proposals for a retirement village seek to maintain the established woodland and will not affect the open space proposal.

## **Need for this type of development**

### National Planning Framework 3

Paragraph 2.4 in the National Planning Framework 3 refers to an ageing Scottish population as well as an increasing population. This supports the delivery of sites aimed at providing a range of housing for elderly people.

### Scottish Planning Policy (2014)

Paragraph 40 of the Scottish Planning Policy provides a series of principles aimed at ensuring that planning directs development to the right place. One of the principles is for development plans to consider the re-use or redevelopment of brownfield land before new development takes place on greenfield sites.

The proposal would deliver a retirement village on an existing brownfield site which has access to existing infrastructure. As such, the proposal is supported by paragraph 40 of SPP.

Paragraph 132 in SPP requires local authorities and housing needs and demand assessments to consider the need for specialist housing provision to support independent living for elderly people and those with a disability. Paragraph 132 continues to state that where a need is identified, planning authorities should prepare policies to support the delivery of appropriate housing and consider allocating specific sites. As demonstrated below, the housing need and demand assessment for SESplan demonstrates a need to provide housing for the elderly due to the 65 years and over age groups having the highest increase in population over the past ten years and for future projections up to 2035.

#### Housing Needs and Demand Assessment 2 (HNDA) - Consultative Draft

The Housing Needs and Demand Assessment 2 (HNDA 2) has been prepared to provide accurate and reliable data on housing need and demand to inform the Main Issues Report in advance of the Second Proposed Strategic Development Plan. The consultative draft includes information on past trends to highlight the key drivers influencing and shaping the current housing market.

Chapter 4 provides an overview of the current demographic profile across the SESplan area, how this has changed over the last ten years and how it is projected to change. The population of the SESplan area has increased by 7.7% (89,581) over the period 2001 to 2011.

Growth has been concentrated in the older age groups with the number of people aged 80+ increasing by 20.1% across the SESplan area. West Lothian have experienced a significant ageing population in comparison to other areas across SESplan with a 32.5% increase in people aged 65-79 compared to an average increase of 8.5% across the SESplan area and a 30.8% increase in people aged 80+.

Section 4.6 provides population projections up to 2035. The population of the SESplan area is projected to increase by 242,720 or 20% from 2010-2035. The older age groups have the most significant projected increases of 62% for those aged 65-79 and 110% for those aged 80+. Of the 65-79 age group, West Lothian is projected to increase most significantly by 80%.

This demonstrates that a significant proportion of the population increase over the past ten years and future projected population growth is in the 65+ age groups with the West Lothian Council area experiencing the highest increase in elderly population across the SESplan area.

The significant increases in the elderly population over the past ten years and the projected 80% increase in 65-79 year olds in West Lothian up to 2035 highlights a pressing need to provide specific housing aimed at this age group. This proposal would contribute to West Lothians housing land supply and be targeted specifically at the age group where there is most pressure to provide housing for.

#### **Suitability of the Site for the Type of Development Proposed**

The Main Issues Report provides a changing context regarding planning policy and recent developments and allocations within the vicinity of the site. The existing housing proposals at Wester Inch are delivering housing completions and the new mixed use proposal to the north of the site demonstrate the changing context of this part of Bathgate.

The Pond site is not defined as a strategic employment site and the introduction of alternative uses nearby including residential uses provides support for allowing alternative uses on the site.

The flexible approach to employment land set out with main issue 1 in the Main Issues Report should be extended to identify the Pond site as a suitable site for alternative uses.

Banks Property have sought the views of key providers of housing targeted for elderly people in Scotland. Bield Housing and Care have been providing quality housing and services for older people in Scotland for over 40 years. They provide a wide range of housing and services for around 15,000 people across 22 local authority areas. Bield offer different types of housing to suit varying needs including amenity and retirement housing for more active elderly people that do not have specific care requirements.

As an established provider of elderly housing, Bield have reviewed the concept and the Pond site and fully support Banks in progressing the concept of a development for older people in this location. They recognise the importance of the private sector in helping to deliver this type of housing due to a reduction in public investment and support Bathgate as a good location with the potential to use existing infrastructure and connections to support a retirement village concept. A letter of support is provide in appendix c) of this submission.

## **The Proposal**

This proposal is for a sustainable retirement village proposal covering approximately 16 hectares of existing industrial land at the Pond Industrial Estate, Bathgate. An indicative masterplan has been prepared and is included in appendix b) of this representation. The indicative masterplan illustrates a site layout including approximately 350 residential units comprising a mix of townhouses, houses and flats. A number of additional facilities are proposed to be provided within the retirement village including;

- Care home
- Community hub including health, retail, commercial and cafe
- Health studio
- Allotments
- Open space

The intention is to provide a hub of services to support the residential units set within a quality and environment with strong pedestrian links.

The indicative masterplan demonstrates the intention of creating a series of different but interconnected neighbourhoods within the site layout. Connections within the site, shared spaces and close proximity of units will encourage interaction and create a sense of community without compromising independence.

The development is aimed specifically at the 55 years of age and older retirement market. In addition to legal conditions restricting the age of residents, Banks Property are confident that occupancy can be controlled through the design and masterplanning of the site and the design principles of the site will deter families.

Detailed care and attention has been giving in the masterplanning to ensure that the specific needs of the target market are recognised and dealt with in the layout, reflecting the needs of the target demographic.

There are a variety of legal restrictions that Banks Property would be welcome to enter into to ensure that the restrictions placed on the site in terms of the age of the occupiers are enforced:

- Would be willing to enter into a section 75 agreement on the site containing the age restriction.
- A condition could be inserted into the planning consent placing an age limit on the development.

Furthermore, any future planning applications would include reference to a “retirement village” in the description of development and that would be the use that would be consented.

### Detailed matters

The indicative masterplan included in appendix b) has considered and addressed a number of constraints within the site. A SUDs pond and park area are located under the pylons that run across the site. The inclusion of allotments and further parkland provides sufficient opportunity to provide the necessary offsets for the pylons and potential ground stability issues. A site investigation will be progressed to demonstrate any parts of the site that require remediation and are potentially not suitable for built development.

The substantial woodland planting on the southern and eastern boundaries will be utilised to provide a secure and pleasant setting for the retirement village. The location of the main community hub and flatted properties on the south west and western boundaries will provide attractive buildings on a key gateway site that leads into Bathgate town centre.

### **Summary**

This representation seeks an allocation for an existing site within an employment area on a site to the south west of Bathgate. The site is brownfield and located within an SDA, where new development should be directed to.

There has been a substantial increase in the elderly population in the SESplan area over the past ten years with the highest increase experienced within the West Lothian Council area. Future projections up to 2035 illustrate that such increases will be even higher in West Lothian.

There is a pressing need to provide housing targeted at the elderly population. This site can deliver a significant amount of such housing as part of a village concept with a community hub, health, retail, commercial and café facilities as well as range of open spaces and allotments.

The indicative masterplan has been designed to demonstrate the retirement village concept and the principles relating to social interaction and building a sense of community that will underpin the development. This approach has been endorsed and supported by an established provider of housing targeted for elderly people, Bield Housing and Care.

Banks Property request that the Pond site is allocated as a retirement village in the West Lothian Local Development Plan and would welcome the opportunity to discuss the proposals in more detail with the Council.

## **Appendices**

- Appendix a) Site location plan
- Appendix b) Indicative Masterplan
- Appendix c) Letter of support, Bield Housing and Care



8<sup>th</sup> October 2014

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2nd Floor, Block C, Brandon Gate  
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ML3 6AU



Craighall Business Park  
7 Eagle Street  
Glasgow  
G4 9XA

Dear Colin,

**Potential Retirement Village, Pond Site, Bathgate**

Having reviewed the concept, viewed the site and spoken to my chief executive, I'm happy to support Banks in progressing the concept of a development for older people in this location.

Demand for older people's services, and particularly housing and care solutions are under significant pressure due to a reduction in public investment and Bield along with many other organisations are looking to the private sector, and specifically existing owners to support their housing and care needs going forward.

We are at an early stage in our new approach and have developed a small number of new build developments offering shared ownership flats for sale in strong market areas. It is hoped the success of these will allow us to grow in confidence and in time move towards further reliance on cross subsidy from outright sale properties (for older people) to help deliver affordable properties for rent, which is our key aim.

Bathgate is a good location with the potential to use the existing infrastructure and connections to support a village concept that should be developed further and Bield, whilst not committing to purchasing or developing any specific parcel, would be happy to assist in progressing this.

I look forward to working with you and your design team in support of the above project.

Yours sincerely



Stuart Dow  
**Director of Asset Management**

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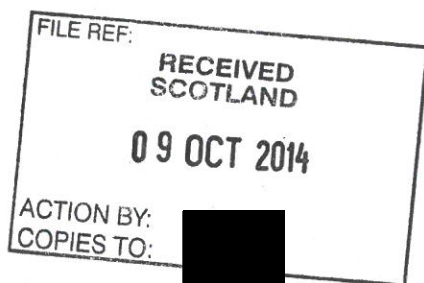


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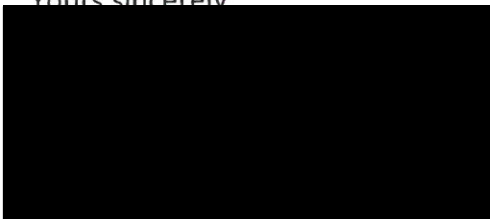
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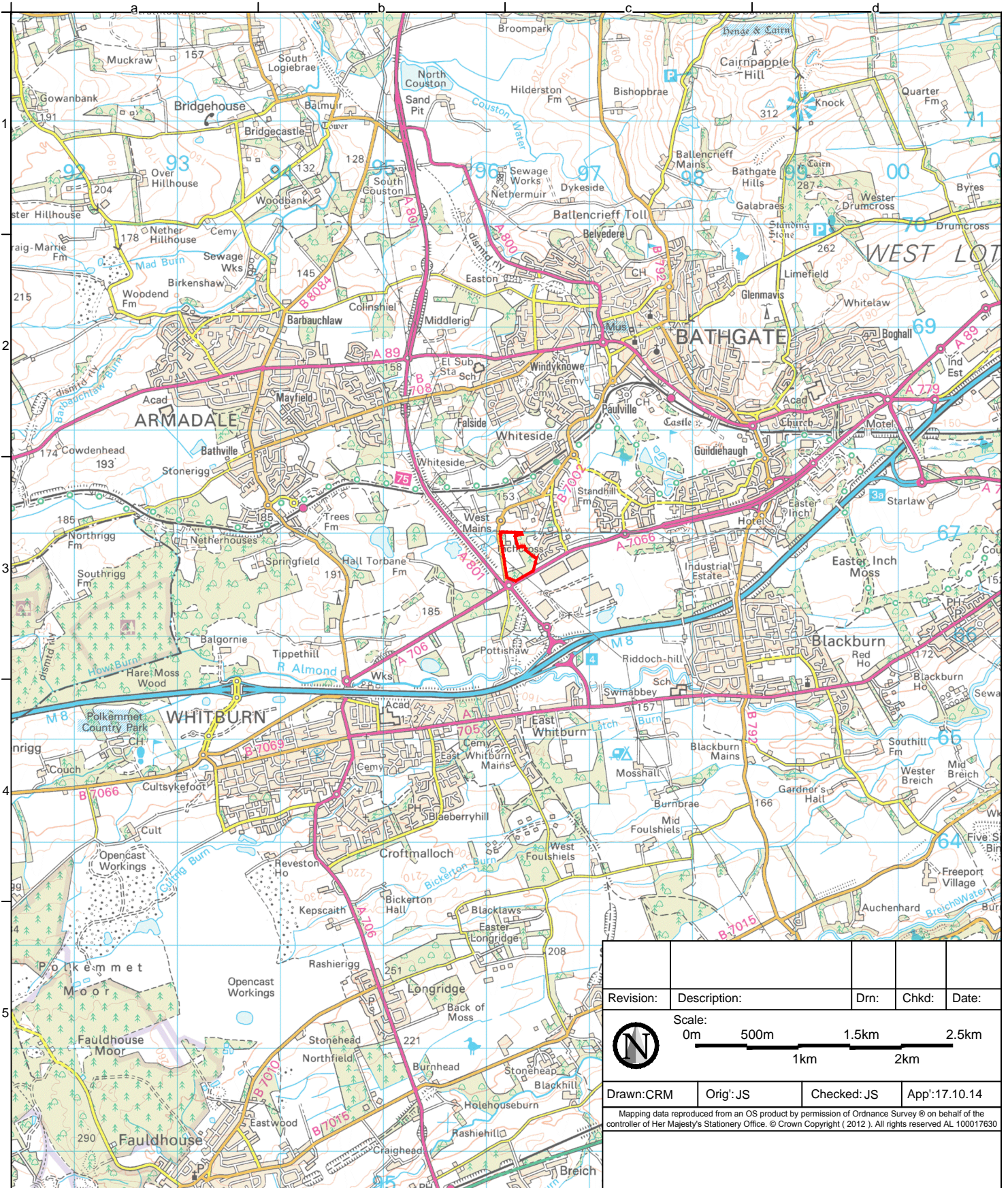
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Revision:	Description:	Drn:	Chkd:	Date:
Scale:		0m 500m 1.5km 2.5km		
		1km 2km		
Drawn: CRM	Orig': JS	Checked: JS	App': 17.10.14	
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**Key**

 Site Boundary

Project: **Pond Industrial Estate**

Title: **Location Plan**

Scale: 1:50000@A4    Ref: HJB / SC615 / 122    Sheet: 1/1

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