

West Lothian Local Development Plan Main Issues Questionnaire

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West Lothian
Council

The council has commenced preparation of its first *Local Development Plan* (LDP). The LDP will replace the *West Lothian Local Plan* and will set out a local interpretation of the requirements of the *Strategic Development Plan* (SESplan) and national guidance. The LDP is a land use plan that identifies site specific development opportunities, sets out the council's key development priorities and provides the policy context for the consideration of applications for planning permission.

The current *West Lothian Local Plan* was adopted by the council in January 2009 is available to view on the council's website at <http://www.westlothian.gov.uk/WLLP>

The *Main Issues Report* (MIR) for the West Lothian LDP is the first key stage in the preparation of the LDP and we are seeking your views on this. All documentation for the MIR can be viewed at <http://www.westlothian.gov.uk/MIR>

Full details on the timetable and stages for preparing the LDP are set out in the Development Plan Scheme 6 which is also available online: <http://www.westlothian.gov.uk/article/2725/Development-Plan-Scheme>

A questionnaire to accompany the MIR is set out below and we would be happy if you would complete and return to us.

There are 98 questions that accompany the *Main Issues Report*. You do not have to respond to all of the questions set out only those which you feel are of particular relevance to you. Completed questionnaires should be returned to us by e-mail to wlldp@westlothian.gov.uk by no later than **5pm on Friday, 17 October 2014**.

Alternatively, please download a copy of the form and send it to us at: Development Planning, West Lothian Council, County Buildings, High Street, Linlithgow, EH49 7EZ (postal address only).

You can keep up to date on the LDP by subscribing to our LDP e-newsletter. If you have not already subscribed, you can do so by going to the following link and following the relevant instructions:

<https://newsletters.westlothian.gov.uk/eNewsletterPro/optin/optinealert.htm>

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Please note that any comments you make will be open to public scrutiny, but we will keep your contact details private and confidential and will only use your name or business name.

By filling in this questionnaire you are helping to shape the future of West Lothian

It would also be helpful if you would complete the *Equal Opportunities Questionnaire*, set out at the end of this document.

Local Development Plan Vision Statement

By 2024 West Lothian's population will have grown and an improved employment position within a more diversified local economy will have been established. It will be better connected by road and public transport and will have a greater choice of housing and an appropriate range of education, community, health, retail, recreation and leisure facilities and a network of green spaces to meet the needs of its growing population. Development will take place in a sustainable way that protects and improves the area's built and natural heritage assets, meets the challenges of climate change and renewable energy and helps regenerate deprived areas and improves the quality of life for people living in West Lothian.

Question 1

Do you agree with the vision for the LDP, or, are there other aspects that should be considered?

YES NO Don't know

Do you have any additional comments?

The vision statement is clear and sets out that West Lothian will have a greater choice of housing by 2024 as a result - which we support.

It may be useful to amend the statement slightly to acknowledge the need to deliver many of the stated aims during the plan period, not just by the end date. For example housing delivery targets are broken down into two distinct periods by SESplan Supplementary Guidance.

A greater choice of housing requires the release of a wide-range of sites of various scales and at various locations. In addition to the already committed CDA sites, new, smaller, effective-in-the-short-term sites should also be included.

Question 2

Do you have an alternative vision, and if so, what is it?

The aims of the *Main Issues Report* and Associated Main Issues are set out in pages 13 of the MIR.

Question 3

Do you agree with the proposed 'Aims' of the LDP? If not, why not?

We support the broad aims as stated, however in respect of Main Issue 3: Housing Growth - Gladman would query the reliance upon CDAs as a major contributor in delivering new homes due to the lack of progress with this mechanism. This has left the Council with a dramatic shortfall in the housing land supply in the short term (c. 5 years), which needs to be addressed through the proactive promotion of alternative sites.

Further under Main Issue 3 - the Council's approach to the provision of affordable housing is failing to meet the housing requirement and consequently requires an overhaul.

Question 4

Do you have an alternatives, and if so, what are they?

Main Issue 3: provision of a range and choice of housing sites in achieving the delivery of targets from 2009 to 2019 and 2019 to 2024 respectively in accordance with the wishes of the Scottish Government.

Commentary in respect of delivery of affordable housing is found later in this statement - Q 35-37.

Main Issue 1: Economic Development and Growth (paragraphs 3.1 - 3.31)

Which areas of West Lothian would be best to direct new economic development towards?

How can the LDP support the council's *Economic Strategy* and facilitate the creation of jobs?

Preferred approach

The council's *preferred approach* to employment land is to review the range of uses which could be accommodated on employment land with a view to accommodating a more flexible approach. This flexible approach will involve removing the single user status of two large sites (Linhouse and Eliburn in Livingston), and allowing a wider range of uses on currently allocated employment sites at locations to be identified in the LDP. Such an approach, for example, would apply to certain traditional employment allocations and industrial estates such as East Mains Industrial Estate, Broxburn and Deans & Houstoun Industrial Estates, Livingston and at Whitehill and Whiteside Industrial Estates, Bathgate and Murraysgate, Whitburn reflecting the broad range of uses which already exist at these locations and to allow for other employment/commercial orientated uses to be accommodated e.g. car showrooms, trade centre outlets and certain leisure uses.

The LDP will continue to support development of existing employment allocations, including sites within the core development areas, and support the servicing of employment allocations to assist in attracting inward investment. New employment land allocations will also be identified to supplement and in some cases complement the existing supply, including a new strategic employment site at Balgornie adjacent to the recently opened Junction 4a on the M8 at Whitburn.

In addition, the LDP will seek to encourage small business development by promoting small workshop developments within communities and home working in appropriate locations. In a limited number of cases, existing employment land is identified as being suitable for potential residential development.

The council's preferred use of the former Vion plant in Broxburn is to allocate the site for housing.

The preferred approach would also include meeting the requirements of the SDP in full.

Alternative approach

The council's *Alternative* approach to employment land is to restrict the range of uses which can be accommodated on employment sites, and to seek to augment the existing portfolio (including Linhouse) by identifying new strategic or local employment sites beyond existing allocations and SESplan requirements to maximise land availability and choice for potential employers. This would, however, result in an oversupply of employment land and could see large employment estates located in non-sustainable, greenfield locations that could have associated local traffic, infrastructure and environmental impacts.

In relation to the former Vion plant at Broxburn the council's alternative approach is to continue to allocate the site for employment use.

Question 5

Do you agree with the 'Preferred' approach to employment land which would introduce an opportunity for a broader range of land use to be supported within existing employment land allocations and industrial estates?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 6

Do you agree with the 'Alternative' approach to employment land?

YES NO Don't know

Do you have any additional comments?

Question 7

Do you have any other alternative approaches? What are they and how would you make them work?

Question 8

Has the council identified enough employment land in West Lothian to meet requirements and are the larger employment sites in the right locations?

YES NO Don't know

Do you have any additional comments?

Question 9

Do you agree that the single user employment site at Linhouse, Livingston (ELv54) should be sub-divided for employment and mixed uses, including residential use of up to 250 houses?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 10

Do you agree that the former strategic employment allocation at Eliburn, Livingston (ELv25) should continue to be promoted for employment uses but not as a single user site?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 11

Do you agree that a site at Balgornie Farm, north of Whitburn, should be allocated for strategic employment land purposes?

If not, why not?

What other locations would you suggest?

YES NO Don't know

Do you have any additional comments?

Main Issue 2: **Community Regeneration** (paragraphs 3.31 - 3.34)

Where should the focus for community regeneration in West Lothian be and what should this seek to deliver?
How can the LDP incentivise development to take place within regeneration areas?
How can the LDP support the council's Regeneration Plan?

Preferred approach

The council's preferred approach to community regeneration is to focus regeneration initiatives on areas identified in the Scottish Index of Multiple Deprivation 2012. This principally includes the smaller settlements in the west of West Lothian identified as Armadale, Blackburn, Blackridge, Fauldhouse, Stoneyburn and Whitburn. Other areas include Bathgate and Boghall and settlements within the Breich Valley where headline levels of disadvantage including unemployment, financial exclusion, poor health and lower education attainment have been identified.

These communities are often characterised by a range of factors which can include high levels of unemployment, low income, lower levels of education attainment, and access to services. To create more balanced communities, address issues of multiple deprivation and to attract private sector investment it is proposed to seek to identify initiatives to generate more investment in these communities.

Alternative approach

The council's alternative to community regeneration is to not pursue regeneration objectives through the development plan and to rely solely on other council led regeneration initiatives.

Question 12

Do you agree with the 'Preferred' approach to community regeneration in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Gladman support the principle of private sector investment in order to create more balanced communities. WLC must recognise that such investment comes inherently with planned settlement growth.

Question 13

Do you agree with the 'Alternative' approach to community regeneration in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 14

Do you have any other alternative approaches?

What are they and how would you make them work?

Main Issue 3: Housing Growth, Delivery and Sustainable Housing Locations (paragraphs 3.35 - 3.63)

How much new housing is required in West Lothian?

Where should new housing development take place, and where should it not be encouraged?

How can the risks associated with the existing development strategy as set out in the *West Lothian Local Plan* be reduced?

How can the rate of house building in West Lothian be increased to ensure that the required five year effective housing land supply is achieved and that the assessed housing need and demand is met in full over the plan period?

Preferred Strategy

The council's preferred strategy is scenario 3 to provide for more housing than the minimum required by the supplementary guidance required to support the SDP and the LDP should allocate housing land for an additional 3,500 houses above existing committed development. This would result in a level of development beyond requirements set out in the housing supplementary guidance to support the SDP. However, this scenario is only preferred if the council can be satisfied that the infrastructure required to support this scale of development can be delivered in full and also in recognition that it is not anticipated that this increased allowance will be delivered by 2024 but is there to allow for the delivery of development into the period 2024-2032.

This recognises that the strategy in the existing adopted local plan is reliant to some extent on a limited number of large, complex sites with high infrastructure costs being brought forward. It is now considered that a range of smaller housing sites, in various locations across West Lothian, is needed in order to provide for greater choice and effectiveness of sites, introduce local flexibility for the LDP and to ensure that a generous housing land supply is available, providing as a minimum, an effective five year housing land supply at all times, as required by SPP.

There is also a need to sustain the momentum built up in some of the existing large housing growth areas and make sure that these developments are viable going forward. Modest additional allocations in some of these areas will provide a degree of future proofing of the plan and help meet part of the need and demand for housing beyond the end of the plan period. Much of the existing housing land supply in core development areas and elsewhere will not be built out within the plan period and allocating additional housing sites in these areas through the LDP will help to maintain investor confidence and inform investment planning.

The allocation required by the draft supplementary guidance prepared by SESplan of 2,130 new houses beyond existing allocations of 22,847 units provides for a total of 24,977 units over the period 2012-2024.

By contrast, the preferred strategy proposes 26,347 houses which provides 3,500 houses above the base supply houses which is an increase of around 15% above the base supply.

This scale of housing allocation will reduce the risk of the LDP development strategy not being successful and is justified on the basis of:

- the need to maintain a five year supply of effective housing land at all times as required by Scottish Government planning policy;
- the need to ensure that there is a generous supply of housing land to accommodate the needs and demands of those seeking a house in West Lothian;
- the need to maintain West Lothian's attractiveness as an area which provides a range and choice of housing sites for those wishing to invest;
- linking the council's Economic Strategy to that of the housing market by providing a range and choice of house types suitable to indigenous and inward investors and the construction industry;
- providing for future affordable housing build programmes;
- continuing to redevelop appropriate brownfield sites;
- allowing the WLLP core development allocations and the strategic allocation at Heartlands, Whitburn to deliver over the long term whilst achieving the five year effective supply through the allocation of predominantly small to medium sized sites where requirements for infrastructure to assist delivery are less onerous on developers;
- allocating above 3,500 will generate the need for a 4th new secondary school which will be expensive to deliver in addition to existing infrastructure commitments;
- replacing allocations in the adopted *West Lothian Local Plan* which may no longer be supported by the site owners or due to reasons of development viability; and
- recognising that as the LDP progresses some housing sites may be delayed or may no longer come forward for a variety of reasons including unexpected development viability.

The preferred strategy is based around an aspiration for growth aimed at delivering sustainable economic prosperity and quality of life for communities in West Lothian and in particular building on the existing significant core development area allocations and strategic sites and will provide a broader range of housing sites.

Alternative Strategy 1

Alternative Strategy 1 reflects scenario 2 set out above and proposes that the LDP should allocate housing land for an additional 2,600 houses, above existing committed development. This would result in a level of development beyond SDP requirements set out in the draft supplementary guidance.

This proposes allocating land for 25,447 houses i.e. 2,600 houses above existing commitments to provide a housing land supply which is around 1.4% more than SDP requirements. This alternative strategy 1 is a variation on the preferred strategy but with a smaller increase in housing allocations above the minimum requirement in the SDP. Whilst Alternative Strategy 1 will provide more choice than Alternative Strategy 2 (see below) there is a risk that the housing supply will not be regarded as sufficiently generous and that an effective five year housing land supply will not be available at all times because existing large sites are taking longer to get underway and build out. This could mean that other sites not allocated for development could be promoted for development and receive planning permission contrary to the development plan. Where the five year land supply is not maintained this could leave the council open to planning by appeal.

Alternative Strategy 2

Alternative Strategy 2 reflects scenario 1 set out above and proposes that the LDP allocates housing land for an additional 2,130 houses above existing committed development. This would result in the requirement set out in the draft supplementary guidance being met but would not allow for any flexibility. A total of 24,977 houses, i.e. 2,130 houses above existing commitments, as required by the supplementary guidance for the SDP but with no flexibility allowance for additional development. This strategy represents a view that West Lothian should grow more slowly.

Whilst this alternative strategy may have certain attractions in terms of minimising impact on the environment and the need for additional infrastructure, it may mean that an effective five year housing land supply is not maintained at all times and could lead to relative economic decline whereby neighbouring authorities supporting higher growth scenarios, are better placed to take advantage of a potential economic upturn and recovery. Where the five year land supply is not maintained this could leave the council open to planning by appeal.

All of these reasons require to be balanced against the need to secure sustainable well located development, protect important environmental assets and landscapes of West Lothian and to have regard to impacts on existing communities and existing and future infrastructure requirements which are likely to arise. This will allow the LDP to focus on improving the quality of our existing established communities, facilities and environment as opposed to being negative in terms of other authorities benefitting from an upturn and the issue of planning by appeal and review a potential increase in housing numbers in the next LDP if economic recovery has indeed taken place in the first plan period.

Question 15

Do you agree with the 'Preferred' strategy for housing growth in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Whilst the preferred strategy goes some way to addressing the housing land requirement set out in the SDP, it does not do enough. We have concerns over the way in which the housing land requirement has been flattened to the whole SDP period of 09-24, rather than specific requirements for the 09-19 and 19-24 periods. The preferred strategy (Scenario 3) does not include a generosity allowance only a 5% increase. This generosity factor is arbitrary and not reasoned (as per para 116 of SPP). Other concerns relate to a severe over-reliance on larger ineffective/ constrained sites- a clear strategy should be set out to deal with established and effective supply. Education provision continues to restrict growth at odds with the statutory obligation for education provision/planned growth. The LDP process appears to be planning to fail, identifying where WLC cannot comply with the SDP (para 3.44) rather than exploring how it can. Positive to see acknowledgement of requirement for flexibility.

Question 16

Do you agree with 'Alternative Strategy 1' for housing growth in West Lothian?

If so, why?

YES NO Don't know

Do you have any additional comments?

This strategy does not provide a sufficient level of housing land supply, being only 2% above the base requirement. This is not consistent with the SPP para 116 requirement for a robustly justified generosity allowance of between 10 and 20%.

Question 17

Do you agree with 'Alternative Strategy 2' for housing growth in West Lothian? If so, why?

No. This strategy does not provide a sufficient level of housing land supply, being only the base requirement. This is not consistent with the SPP para 116 requirement for a robustly justified generosity allowance of between 10 and 20%.

Question 18

Do you have another alternative strategy?

What is it and how would you make it work?

As per q. 15

Allocate sufficient housing land to provide a generous supply of effective housing land. This generous supply should include a robustly evidenced buffer of between 10 and 20% in line with national policy.

Question 19

How can the council maintain an effective five year housing land supply given the current economic climate?

*- ensure a range and choice of large, medium and smaller sites in a range of locations, the majority of West Lothian is an SDP SDA.
- release suitable sites under SESPlan 7 in the interim period (now) in order to address the immediate shortfall and assist LDP process and adopt a flexible and pragmatic approach to resolving education capacity constraints.
- revisit settlement strategies - highlight towns most suitable for growth and identify actions that the Council can take to remove constraints
- use LDP process to fully address the education constraints - otherwise this will continue to be a sticking point in delivery moving forward.
options include considering larger scale development, that may be able to offer stand alone solutions.*

We would urge the Council to consider effective options, such as the live planning application at Brotherton Farm, currently in their consideration, as a means to deliver housing units in the short term.

Preferred and alternative options for housing sites, including potential de-allocations from the *West Lothian Local Plan* (paragraphs 3.64 – 3.73)

Preferred Option

The council's preferred option is that some housing sites allocated in the adopted *West Lothian Local Plan* and identified in Housing Land Audit 2012 are not included in the LDP. Details of sites are set out in the Settlement Statements accompanying the MIR.

Alternative Option

The council's alternative option is that all housing sites allocated in the adopted *West Lothian Local Plan* and identified in Housing Land Audit 2012 be included in the LDP.

Question 20

Do you agree with the 'Preferred' option for the removal of existing housing allocations from the development plan?
If not, why not?

YES NO Don't know

Do you have any additional comments?

The question is unclear as it suggests removal of 'existing allocations', but is unclear whether this means all existing allocations, only undeliverable sites, or those which are highly unlikely to become effective during the life of the plan should be removed. Whilst a 'tidying-up' of the site allocations is welcomed, this should not be at the expense of a choice and range of sites. The selection of new sites in the MIR is a positive step however there needs to be rigorous assessment of the housing land supply, resulting in removal of constrained and non-effective sites and replacement with effective sites in order that the new plan can deliver.

We remain concerned however at the delayed phasing of some of the sites listed in the MIR, particularly where they are delayed in order to allow education constraints to be resolved. This mechanism is troubling, as elsewhere the MIR suggest that these constraints will only be addressed through developer contribution

Question 21

Do you agree with the 'Alternative' option' for the removal of existing housing allocations from the development plan?
If not, why not?

YES NO Don't know

Do you have any additional comments?

This option is potentially preferable to removal of all existing sites, as it could allow for a greater degree of flexibility within the housing land supply. However, we would only be able to support such an option if it were also to allow for the addition of new sites, in order to ensure that a generous and effective five-year supply of housing-land is maintained at all times, in accordance with the split-phasing of the SDP.

Question 22

Do you have any other alternative options?
What are they and how would you make them work?

YES NO Don't know

Do you have any additional comments?

Preferred Approach to the Core Development Areas

The council's 'Preferred' approach to the core development areas is to continue to support their delivery and allow for further longer term allocations at Winchburgh.

Alternative Approach to the Core Development Areas

The council's 'Alternative' approach is not to allow for any further development beyond that set out in approved master plans and the *West Lothian Local Plan*.

Question 23

Do you agree with the 'Preferred' approach to the core development areas?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Whilst we support the principle of the CDAs, their promotion should not be at the expense of non-CDA sites which have a valuable role to play in delivering and maintaining an effective housing land supply.

Winchburgh in particular has been slow to deliver, whilst some CDAs have failed to produce any numbers whatsoever - thus a range of options need to be included in the LDP to ensure that an effective five-year supply of housing land is maintained at all times. A mixture of different type and size of sites can contribute to the success of the LDP.

Question 24

Do you agree with the 'Alternative' approach to the core development areas?

If not, why not?

YES NO Don't know

Do you have any additional comments?

The alternative approach is unnecessarily limiting and does not allow for changes in circumstances or context. WLC should work towards a flexible and responsive housing land supply, within which both large and small scale sites have a role to play.

Question 25

Do you have any other alternative options?

What are they and how would you make them work?

YES NO Don't know

Do you have any additional comments?

Preferred Approach to Heartlands, Whitburn

The council's 'Preferred' approach to Heartlands, Whitburn is to look favourably on proposals for additional housing within the existing housing allocation, subject to infrastructure constraints being resolved.

Alternative Approach

The council's 'Alternative' approach is that the number of houses at "Heartlands" be restricted to 2,000.

Question 26

Do you agree with the 'Preferred' approach to Heartlands, Whitburn?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 27

Do you agree with the 'Alternative' approach to Heartlands?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 28

Do you have any other alternative options?

What are they and how would you make them work?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach to Linlithgow is that the "area of restraint" be re-considered to allow for greenfield release of housing, employment and potential tourist related development. Should the area of restraint be removed, any development would be dependent upon the delivery of a new secondary school at Winchburgh and therefore would be focussed principally in latter plan period. Any land release would follow a sequential approach as set out in paragraph 3.93

Alternative approach

The council's 'Alternative' approach to Linlithgow is that the "area of restraint" approach be maintained and that development be directed to brownfield opportunities within the existing settlement boundary in the first instance and thereafter greenfield release within the town.

Question 29

Should the definition of Linlithgow as an 'area of restraint' be removed, and if so, how should the town be developed in the future?

YES NO Don't know

Do you have any additional comments?

Should a sequential approach be applied to the release of land in and around Linlithgow to accommodate any new development?

YES NO Don't know

Do you have any additional comments?

Question 30

What alternatives are available in order to meet demand for housing (including affordable housing) and employment land opportunities in Linlithgow?

Question 31

Should land continue to be safeguarded for west facing slip roads on the M9 at Junction 3, Linlithgow? If so, should new development be promoted in Linlithgow to ensure that funding for these can be secured?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach to the Deans South estate, Livingston, is that the area be identified for comprehensive redevelopment for approximately 300 new houses.

Alternative approach

The council's 'Alternative' approach to the Deans South estate, Livingston, is that the LDP should not identify the area for comprehensive redevelopment for approximately 300 new houses.

Question 32

Do you agree with the 'Preferred' approach for addressing the Deans South estate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 33

Do you agree with the 'Alternative' approach for addressing the Deans South estate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 34

Do you have any other alternative approaches?

What are these and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach to affordable housing is to review the terms of the current affordable housing policy and set this out in supplementary guidance.

Alternative approach

The council's 'Alternative' approach to affordable housing is to continue to implement existing policy.

Question 35

Do you agree with the 'Preferred' approach to affordable housing? If not, why not?

YES NO Don't know

Do you have any additional comments?

It is clear from problems in delivering affordable housing in the area, that West Lothian Council urgently need to review their existing Affordable Housing Policy.

Production of Supplementary Guidance to reflect the terms of SPP and SDP would be helpful.

There must be allowance for flexibility in delivery methods - not just Council led provision. This is critical in any case however more so should the proposed increase in the percentage of affordable provision occur - in order to ensure development viability and site effectiveness.

Question 36

Do you agree with the 'Alternative' approach to affordable housing? If not, why not?

YES NO Don't know

Do you have any additional comments?

In our experience, the council's existing approach to affordable housing is inflexible at present and somewhat insensitive to commercial realities and practicalities. The Policy, or at least its implementation is overly focused on delivering the Council's 1000 houses than delivering affordable housing as a wider aim. Policy should be updated to reflect more deliverable outcomes, through flexibility.

Question 37

Do you have any other alternative approaches? What are they and how would you make them work?

YES NO Don't know

Do you have any additional comments?

Affordable housing provision should be in line with the options set out in SPP, paragraph 126:

- Social rented
- Mid market rented
- Shared ownership
- Shared equity
- Housing sold at a discount (including plots for self-build), and
- Low cost housing without subsidy.

Main Issue 4: Infrastructure Requirements and Delivery

How can we ensure that new development in West Lothian makes best use of existing infrastructure?

How can we make sure that the cost of providing new infrastructure needed to support new development does not fall unduly on the tax payer?

How can we ensure that developer contribution costs are affordable and do not make the development of sites unviable?

Infrastructure requirements and delivery – providing for community needs: education, healthcare and sports facilities

Preferred approach

The council's 'Preferred' approach to infrastructure provision, in particular education provision, is to promote additional growth which can for the most part utilise existing infrastructure capacity, and minimise additional significant new infrastructure requirements over and above existing planned upgrades and requirements. Developer contributions will continue to be sought, the basis for which will be set out in a combination of generic and specific supplementary guidance. The council's preferred approach to infrastructure delivery is supported by Policy 9 of the SDP. The preferred approach is also to further develop funding mechanisms and supplementary guidance to assist in delivery.

Alternative approach

The council's 'Alternative' approach to infrastructure provision is not to promote growth particularly that which would require substantial investment in new infrastructure given the current limited ability of the development industry to deliver up-front funding for infrastructure projects. Such an approach, however, is unrealistic and contrary to national planning policy.

Question 38

Do you agree with the 'Preferred' approach to infrastructure provision? If not, why not?

YES NO Don't know

Do you have any additional comments?

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We do not support the preferred approach as this largely reflects the Council's current strategy - which is unsuccessful. West Lothian Council's development strategy for growth is based around education and infrastructure constraints, and there needs to be a clear strategy for dealing with this moving forward, or the same issues will continue to arise. Provision of a range of specific and generic supplementary planning guidance only serves to draw out this process.

Taking on board SDP policy 9 - recognising the priorities for investment, cannot all be met via developer contributions. Developer contributions are acceptable when related in scale and kind and under the terms of the Circular, however, Local Authorities have a statutory obligation to provide for education.

Question 39

Do you agree with the 'Alternative' approach to infrastructure provision?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 40

Do you have any other alternative approaches?

What are they and how would you make them work?

YES NO Don't know

Do you have any additional comments?

Based along similar principles - however we could advocate a simple structure of developer contributions, such as set out by Falkirk Council, relating to education - on a per unit basis.

We would re-iterate that the LDP presents an opportunity to address infrastructure constraints to development.

Further transparency and use of the Local Infrastructure Fund may also be useful.

Question 41

How can the level of infrastructure required to support the scale of development proposed be delivered?

Do you have any additional comments?

Careful management - in many cases infrastructure provision (e.g. education) can be delivered with careful management without causing undue harm to education provision of undue expense to the public purse.

Spreading delivery across a range of sites in a range of locations.

Following the tests of Circular 1/2010.

Infrastructure – transport and access in and around West Lothian (*paragraphs 3.132 – 3.159*)

Preferred approach

The council's 'Preferred' approach to promoting access to/from/within West Lothian is to address outstanding constraints in the strategic and local road network which are essential to accommodate community growth and in particular economic and housing growth and tackle existing traffic issues whilst promoting sustainable transport measures on an incremental basis in conjunction with new development, and as resources allow. Within this, the preferred approach is to promote development on or very near to existing public transport facilities or where there is potential for new facilities. This approach will help to sustain and improve services which in turn will become more attractive alternatives to the private car.

Alternative approach

The council's 'Alternative' approach to promoting access to/from/within West Lothian is to shift emphasis away from addressing road network issues to focus exclusively on sustainable transport measures, however, this is not considered a reasonable alternative given the commitment to strategic road improvements through NPF2, the SDP and the need to accommodate existing committed development across West Lothian.

Given physical, policy and resource constraints, it is not considered that there are any other reasonable alternatives to the preferred approach.

Question 42

Do you agree with the 'Preferred' approach to promoting access to/from/within West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

This is a sensible approach, and should work in tandem with the allocation of a range of sites for residential development

Question 43

Do you agree that the council should continue to work towards the provision of a new rail station at Winchburgh?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 44

Do you have any other alternative approaches?
What are they and how would you make them work?

YES NO Don't know

Do you have any additional comments?

Main Issue 5: **Town Centres and Retailing** (paragraphs 3.160 – 3.171)

What do we need to do to promote and sustain our traditional town centres in West Lothian and consolidate the sub-regional centre at Almondvale, Livingston?

Preferred approach

The council's 'Preferred' approach to town centre retail provision in West Lothian is to:

- sustain and improve town centres by applying the sequential approach to proposals for retail and leisure development;
- reduce leakage from some areas in accordance with the council's Retail Capacity Study;
- facilitate the creation of a new town centre in Winchburgh;
- safeguard existing and promote new local neighbourhood centres: and
- bring about village and town centre improvements by highlighting development opportunities, supporting the development of brownfield sites, implementing improvements through the capital plan and, where appropriate, securing developer contributions.

The preferred approach includes removing retail policy restrictions currently in place in Bathgate and Linlithgow town centres to allow for a broader range of uses which will support the take up of empty units. In addition, initiatives to support and promote development above shops will be encouraged, subject to availability of infrastructure and to the operation of existing business premises not being unduly prejudiced.

Alternative approach

The 'Alternative' approach is to:

- sustain and improve town centres by applying the sequential approach to proposals for retail and leisure development;
- reduce leakage from some areas in accordance with the council's Retail Capacity Study;
- facilitate the creation of a new town centre in Winchburgh;
- safeguard existing and promote new local neighbourhood centres: and
- bring about village and town centre improvements by highlighting development opportunities, supporting the development of brownfield sites, implementing improvements through the capital plan and, where appropriate, securing developer contributions.

This approach excludes removing current retail policy restrictions in place in Bathgate and Linlithgow town centres.

Question 45

Do you agree that the 'Preferred' approach to town centres and retail provision in West Lothian is appropriate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 46

Do you agree with the 'Alternative' approach to town centres and retail provision in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 47

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Main Issue 6: The Natural and Historic Environment (paragraphs 3.172 – 3.213)

How can planning policy promote sustainable patterns of development to protect our valued landscapes, built and cultural heritage and create a green network across West Lothian?

Preferred approach

The council's 'Preferred' approach to the West Lothian natural environment is to direct development to appropriate brownfield sites within settlements in the first instance but also to bring forward the release of greenfield sites in sustainable locations where there are no alternatives in order to meet strategic requirements. When considering greenfield release the council will have regard to the LLDR and other relevant factors, particularly sustainability but also issues of townscape and settlement coalescence. This may allow for some release of new development sites on the edge of settlements, thereby maximising use of existing infrastructure, whilst protecting visual amenity and the biodiversity value of the countryside and preventing coalescence of settlements.

In some instances it may be necessary to extend countryside and landscape designations to protect the purposes for which the land was designated be it landscape value, landscape character and landscape enhancement, buffers to coalescence of settlements, protection of prime quality agricultural land and historic gardens and designed landscapes in West Lothian.

Alternative approach

The 'Alternative' approach to the West Lothian natural environment and landscapes is to focus less on brownfield land and allow parts of designated areas to be released for housing or employment development.

Question 48

Do you agree with the 'Preferred' approach to the natural environment in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 49

Do you agree with the 'Alternative' approach to the natural environment in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 50

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Landscape approach and designation (*paragraphs 3.172 - 3.170*)

Preferred approach

The council's 'Preferred' approach to landscape designations is to reduce the number of landscape designations in order to reflect the findings of the Local Landscape Designation Review and identify candidate Special Landscape Areas (cSLA). Special Landscape Areas will replace AGLVs and Areas of Special Landscape Control. This approach is in accord with best practice and guidance prepared by Scottish Natural Heritage and Scottish Government.

Alternative approach

The council's 'Alternative' approach to landscape designations is to continue with the current approach, relying on existing policies and designations. This would not achieve the goal of updating and simplifying landscape designations in accordance with current best practice and national guidance.

Question 51

Do you agree with the 'Preferred' approach to landscape designations in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

The approach focusses upon core areas of landscape quality, whereas previously the quantity of land subject to designation appeared out of kilter with the actual landscape quality.

Where the approach is less convincing is when the boundary of candidate SLA merely accords with the boundary of a character area, rather than being more closely examined and defined relative to local features, topography and character. The zone of transition between character areas is often difficult to pin down to a particular line; therefore an SLA boundary that merely follows the LCA boundary looks hard to justify at the field scale, where consideration of the SLA criteria needs to be applied in some detail to arrive at a defensible boundary to the designation.

Question 52

Do you agree with the 'Alternative' approach to landscape designations in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

The division into different designations is not rigorous, and the quantum of land covered by these designations appears excessive when criteria of relative quality AND character are considered.

Question 53

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Development in the countryside (*paragraphs 3.180 – 3.181*)

Preferred approach

The council's 'Preferred' approach to housing development in the countryside is to continue to support development in appropriate circumstances for example, sensitive redevelopment of steadings; limited enabling development to secure restoration of historic buildings or structures; and replacement of houses in a habitable condition. Existing Supplementary Guidance will be updated to clarify the circumstances in which development will be permitted, and the design standards expected. The current flexibility in policies on business and tourism development in the countryside will be maintained and it is proposed to carry forward the existing policy on 'very low density rural housing in the countryside' otherwise known as 'lowland crofting' but only in the west of West Lothian.

Alternative approach 1

The council's first 'Alternative' approach to housing development in the countryside is to allow relaxations to current policies, potentially by permitting more redevelopment of rural brownfield land for housing. However, this approach is inherently non-sustainable as it would result in development which is remote from services and could lead to a proliferation of undesirable, sporadic development in the countryside.

Alternative approach 2

The council's second 'Alternative' approach to housing development in the countryside is not to maintain the current policy approach. This would include a review of the current 'lowland crofting' policy.

Question 54

Is the 'Preferred' approach to housing development in the countryside appropriate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 55

Do you agree with any of the 'Alternative' approaches to housing development in the countryside?

YES NO Don't know

Do you have any additional comments?

Question 56

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

[Business, tourism and recreational uses in the countryside \(paragraph 3.182\)](#)

Preferred approach

The council's 'Preferred' approach to business, tourism and recreational uses in the countryside is to generally continue with the current policy approach set out in existing supplementary guidance.

Alternative approach

The council's 'Alternative' approach to business, tourism and recreational uses in the countryside is to allow relaxations to current policies. However, this approach could lead to a proliferation of undesirable development in the countryside.

Question 57

Do you agree with the 'Preferred' approach to business, tourism and recreational uses in the countryside?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 58

Do you agree with the 'Alternative' approach to business, tourism and recreational uses in the countryside?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 59

Do you have an alternative approach?
What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

[Green Networks, and extension to Pentland Hills Regional Park \(paragraphs 3.183 – 3.189\)](#)

Preferred approach

The council's 'Preferred' approach to the green network is to define the part of CSGN in West Lothian as a network of multi-functional green corridors focussing on the existing network. This would build on the existing initiatives extending the network into the rural hinterland to connect with adjacent local authorities existing and emerging networks, and penetrating into urban areas, linking with the council's Open Space Strategy and Core Paths Plan.

Alternative approach

The council's 'Alternative' approach to the green network is to maintain the existing green spaces in their present form, with a clear urban fringe focus. This would continue to prioritise resources closest to the places people live and work, but would fail to capture the wider focus of the CSGN to link existing and new green spaces into wider multi-functional green networks.

Question 60

Do you agree with the 'Preferred' approach to the green network in West Lothian?
If not, why not?

YES NO Don't know

Do you have any additional comments?

We support this objective and encourage opportunities to be explored in relation to live planning applications, such as Brotherton Farm Livingston, ref.0648/P/14. The strategy should recognise that established patterns of development within towns include green spaces, best illustrated in Livingston.

Question 61

Does the proposed West Lothian wide green network capture the best strategic opportunities or are there any missing links?

YES NO Don't know

Do you have any additional comments?

Question 62

Do you have any suggestions for a green network across West Lothian?

YES NO Don't know

Do you have any additional comments?

Question 63

Do you have any suggestions for a green network across West Lothian?

YES NO Don't know

Do you have any additional comments?

Question 64

Do you have an alternative approach? What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Question 65

What are your views on the proposed extension to the Pentland Hills Regional Park in West Lothian?

YES NO Don't know

Do you have any additional comments?

Biodiversity and Geodiversity (*paragraphs 3.190 – 3.197*)

Preferred approach

The council's 'Preferred' approach to biodiversity and geodiversity sites is to review and update the existing list of locally designated sites (Wildlife Sites and Regionally Important Geological/Geomorphological Sites RIGS) and to protect and promote improvements to them through Supplementary Guidance where appropriate. Policy protection for carbon-rich soils will be reinforced.

Alternative approach

The council's 'Alternative' approach to biodiversity and geodiversity sites would be not to promote Supplementary Guidance, but simply to map local sites within the LDP as at present. Whilst this might give the sites more prominence within the LDP, the process would be less functional.

Question 66

Do you have any general or specific issues with the proposed list of Local Biodiversity Sites and Local Geodiversity Sites?

YES NO Don't know

Do you have any additional comments?

Question 67

Do you agree with the 'Preferred' approach to Biodiversity and Geodiversity in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 68

Do you agree with the 'Alternative' approach to Biodiversity and Geodiversity in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 69

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

West Lothian Open Space Strategy 2005-2015 (paragraph 3.198)

Question 70

Do you have any views on what should be considered for the second Open Space Strategy for 2015/16?

Why should these be considered?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach to the historic environment is to review the current range of policies related to the historic environment, updating where necessary to reflect changes in legislation, and to prepare supplementary guidance to protect and promote built heritage assets and to consider designating conservation areas at Abercorn village and Hopetoun Estate. In addition, conservation area appraisals of all conservation areas will be progressed where resources allow.

Alternative approach

The council's 'Alternative' approach to the historic environment is to maintain the current approach to the historic environment and not to promote a conservation area at Abercorn village and Hopetoun Estate.

Question 71

Is the 'Preferred' approach to the historic environment in West Lothian appropriate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 72

Do you agree with the 'Alternative' approach to the Historic Environment in West Lothian?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 73

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach to Bangour Village Hospital site is to support at least 550 houses at the site, with the precise number of houses being agreed through detailed assessment of a master plan and other supporting information. Delivery of the site will be allied to the delivery of the infrastructure required to support the development whilst having regard to the built and natural environmental sensitivities of the site.

Alternative approach

The council's 'Alternative' approach is that housing development at the Bangour Village Hospital site should be restricted to 500 units.

Question 74

Is the 'Preferred' approach to Bangour Village Hospital appropriate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 75

Do you agree with the 'Alternative' approach to Bangour Village Hospital?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 76

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach to the former Bangour General Hospital site is to assess development proposals against development in the countryside policies in the LDP.

Alternative approach

The council's 'Alternative' approach to the Bangour General Hospital site is to maintain the policy presumption in favour of development as set out in the *West Lothian Local Plan*.

Question 77

Is the 'Preferred' approach to Bangour General Hospital appropriate?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 78

Do you agree with the 'Alternative' approach to Bangour General Hospital?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 79

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach to the Union Canal is to promote its tourism and recreational potential and to allow for sympathetic ancillary development at the most appropriate locations along its length, having regard as to how this best fits with the wider strategy being developed by Scottish Canals for the whole waterway and in consultation with other neighbouring local authorities.

The canal also has potential to be used as a means of sustainable transport, both for leisure and commercial purposes, and it is important that opportunities to enhance local use, access and bio-diversity are maximised.

Securing the long term maintenance of this important historic structure is also paramount and it is concluded that this is best achieved by ensuring that it is well used and has as diverse a range of functions as practicable.

The rural setting of the section of the Union Canal between Winchburgh and Broxburn should continue to be protected as countryside belt or as a candidate special Landscape Designation Area as identified in the draft Local Landscape Designation Review.

Alternative approach

The council's 'Alternative' approach to the Union Canal is that no development, on or directly abutting it, and particularly in the countryside between Broxburn and Winchburgh, should be permitted. This is considered necessary in order to maintain the established setting of the Union Canal and to conserve its historic fabric. The only concession would be for necessary maintenance or for works to improve the canal and public access to it.

Question 80

Is the 'Preferred' approach to the Union Canal appropriate?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 81

Do you agree with the 'Alternative' approach to the Union Canal?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 82

Do you have an alternative approach?
What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Public Art (paragraph 3.213)

Preferred approach

The council's 'Preferred' approach to public art is to continue to seek developer contributions appropriate to the scale and type of development and to review supplementary guidance.

Alternative approach

The council's 'Alternative' approach to public art is to cease requiring developer contributions for public art or to limit the circumstances under which contributions are required.

Question 83

Do you agree with the 'Preferred' approach to public art?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 84

Do you agree with the 'Alternative' approach to public art?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 85

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Main Issue 7: **Climate Change and Renewable Energy** (paragraphs 3.214 - 3.225)

How can future patterns of development in West Lothian increase climate resilience and contribute towards meeting Scottish Government targets for reducing greenhouse gas emissions and increasing renewable energy?

Preferred approach

The council's 'Preferred' approach for renewable energy is to retain the supportive policy framework for renewable energy developments, extending it to all low carbon energy technologies and implement the terms of supplementary guidance for wind energy developments.

Alternative approach

The council's 'Alternative' approach for renewable energy is to retain the current criteria-based wind energy policy, without the support of a spatial framework. This is not considered to provide the necessary guidance for landowners or the industry, as required by Scottish Government and would not be in accordance with current best practice, Scottish Planning Policy and guidance.

Question 86

Do you agree with the 'Preferred' approach to renewable energy?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 87

Do you agree with the 'Alternative' approach to renewable energy?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 88

Do you have an alternative approach?
What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Flood risk and management (*paragraphs 3.226 – 3.229*)

Preferred approach

The council's 'Preferred' approach to flood risk is to maintain and update existing policies and supplementary guidance on flood risk, taking account of legislative requirements and emerging Scottish Government guidance, including the RBMP as appropriate.

Alternative approach

The council's 'Alternative' approach to flood risk is to go beyond requirements and identify and protect areas of land for natural flood management as this will be a consideration in the new management plans.

Question 89

Do you agree with the 'Preferred' approach to flood risk appropriate?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 90

Do you agree with the 'Alternative' approach to flood risk?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 91

Do you have an alternative approach?
What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Air quality and noise (*paragraphs 3.230 – 3.232*)

Preferred approach

The council's 'Preferred' approach to air quality is to maintain and update existing policies on air quality, taking account of legislative requirements and any emerging Scottish Government guidance.

Alternative approach

There are no reasonable alternatives to the preferred approach.

Question 92

Do you agree with the 'Preferred' approach to air quality appropriate?
If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 93

Do you have an alternative approach?
What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Main Issue 8: Minerals and Waste (paragraphs 3.233 – 3.246)

How can planning policy promote and ensure sustainable approaches to waste management and mineral resources in West Lothian?

Minerals (paragraphs 3.233 - 3.242)

Preferred approach

The council's 'Preferred' approach towards mineral extraction is to continue to implement the policy approach set out in the SDP and the adopted WLLP. The policy approach set out in these will however, be reviewed to take account of the guidance contained within SPP. This may be pursued through supplementary planning guidance.

Alternative approach

The council's alternative approach towards mineral extraction is to take a more liberal approach to opencast coal and hard rock extraction by widening the opencast coal "broad areas of search" and identifying the whole of West Lothian as an area of search for other minerals to be extracted, subject to environmental and residential amenity considerations and constraints, by identifying these areas and appropriate buffers beyond which the search for minerals could take place.

Question 94

Do you agree with the 'Preferred' approach to mineral extraction?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 95

Do you agree with the 'Alternative' approach to mineral extraction?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 96

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Preferred approach

The council's 'Preferred' approach towards waste management is to support the objectives of the Zero Waste Plan, to accommodate new provision through extensions to existing recycling facilities, or in other suitable areas and to provide a policy framework which supports the development of these facilities.

Alternative approach

The council has not identified a reasonable alternative approach to the preferred approach.

Question 97

Do you agree with the 'Preferred' approach to waste management?

If not, why not?

YES NO Don't know

Do you have any additional comments?

Question 98

Do you have an alternative approach?

What is it and how would you make it work?

YES NO Don't know

Do you have any additional comments?

Additional information

Extra page for additional information you want to give on question(s). Please state the question number text refers to.

Comments on Housing Land Background Paper:

WLC is suggesting that despite having ratified the Supplementary Guidance on Housing Land, which sets the housing land requirement for the Council and allocates the requirement between two periods of the plan (2009-2019 and 2019 to 2024), there is "no definitive housing requirement against which the effectiveness of the five-year housing land supply can be measured" and that "it is necessary to appreciate that the land supply scenario has now been superseded and the calculations do not include any of the new allocations that are intended to be brought forward through the new LDP to meet the terms of the SDP Supplementary Guidance".

This approach by the Council ignores the duty in paragraph 110 of SPP which sets a requirement for a five-year supply of effective housing-land "at all times". Whilst we do not dispute that the Council is committed to supporting and encouraging growth in the housing sector, we are concerned that it appears to be using the LDP process to stall development, by suggesting that housing-land requirements cannot be calculated, nor actions (explicitly allowed for in the SDP) taken to address any shortfall until such time as the LDP has been adopted. This approach is directly contrary to the intention of Scottish Ministers expressed through SPP (taken as a whole, but with particular reference to paragraphs 110, 116, 123-125 and 32-35) and the adoption process relating to the SDP.

The attached Housing Land Supply tables set out how the housing land requirement is not currently being met on the basis of the data provided by the Council (the HLA) and the methodology preferred by the Council and the development industry (combining or splitting the housing land requirement, and including or excluding the minimum generosity figures).

The Council argues that there is no agreed methodology for calculating supply for the five year periods bridging the 09-19 and the 19-24 housing requirement periods in the strategic plan. However, it is a simple calculation which can be expressed as;

"Housing Land Requirement = (Period A yearly requirement multiplied by years in Period A) + (Period B yearly requirement multiplied by years in Period B) + any shortfall which has arisen"

When the housing requirement and completions figures published by the Council are put into this calculation, it gives the following results;

$$\begin{array}{l} 13-18 \text{ HLR} = (1142 \times 5) + (1318 \times 0) + \text{shortfall} \\ \quad \quad \quad 5710 \quad \quad \quad \quad \quad \quad \quad + \text{shortfall} \end{array}$$

$$\begin{array}{l} 14-19 \text{ HLR} = (1142 \times 5) + (1318 \times 0) + \text{shortfall} \\ \quad \quad \quad 5710 \quad \quad \quad \quad \quad \quad \quad + \text{shortfall} \end{array}$$

$$\begin{array}{l} 15-20 \text{ HLR} = (1142 \times 4) + (1318 \times 1) + \text{shortfall} \\ \quad \quad \quad 5886 \quad \quad \quad \quad \quad \quad \quad + \text{shortfall} \end{array}$$

$$\begin{array}{l} 16-21 \text{ HLR} = (1142 \times 3) + (1318 \times 2) + \text{shortfall} \\ \quad \quad \quad 6062 \quad \quad \quad \quad \quad \quad \quad + \text{shortfall} \end{array}$$

$$\begin{array}{l} 17-22 \text{ HLR} = (1142 \times 2) + (1318 \times 3) + \text{shortfall} \\ \quad \quad \quad 6238 \quad \quad \quad \quad \quad \quad \quad + \text{shortfall} \end{array}$$

$$\begin{array}{l} 18-23 \text{ HLR} = (1142 \times 1) + (1318 \times 4) + \text{shortfall} \\ \quad \quad \quad 6414 \quad \quad \quad \quad \quad \quad \quad + \text{shortfall} \end{array}$$

$$\begin{array}{l} 19-24 \text{ HLR} = (1142 \times 0) + (1318 \times 5) + \text{shortfall} \\ \quad \quad \quad 6590 \quad \quad \quad \quad \quad \quad \quad + \text{shortfall} \end{array}$$

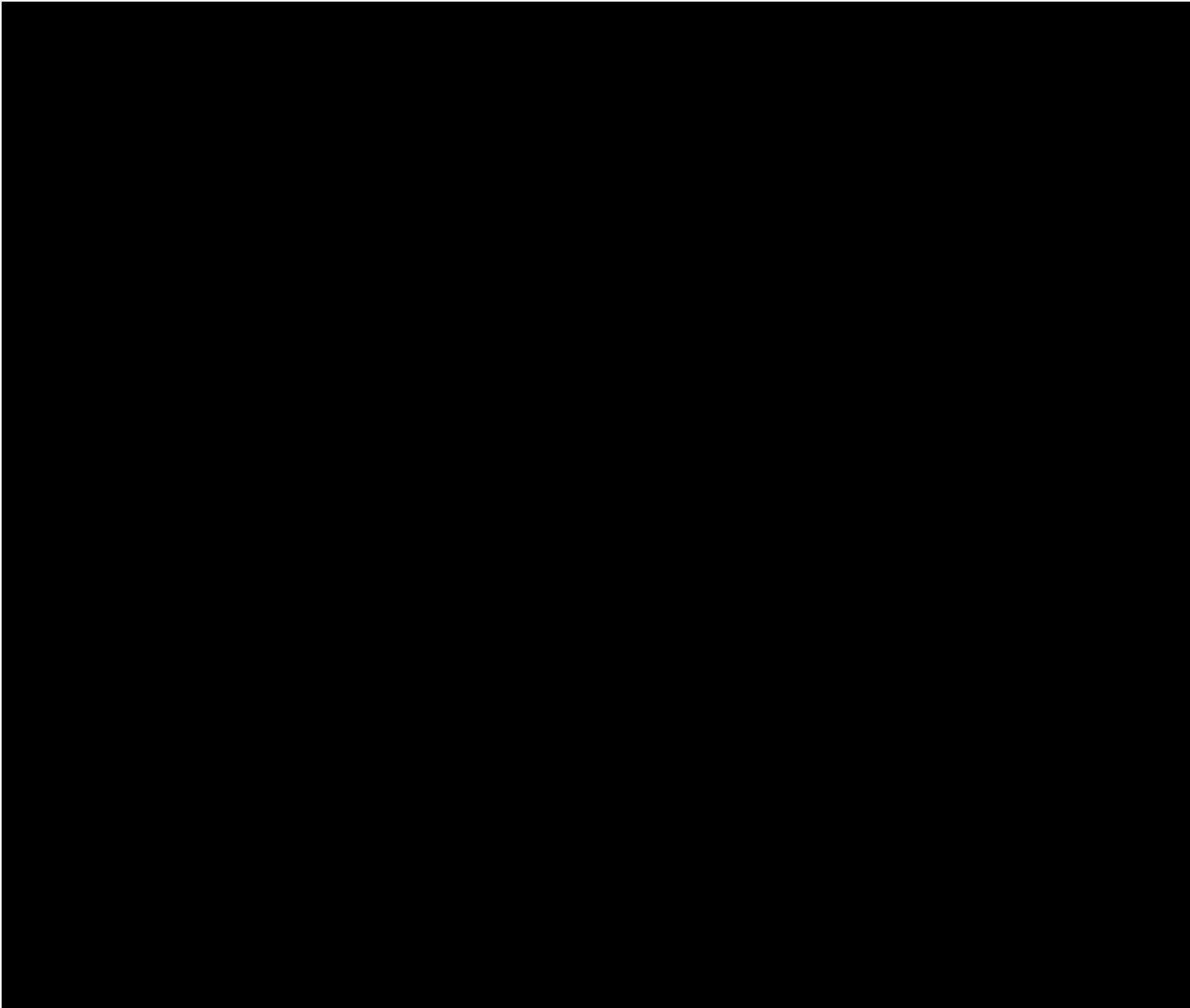
It can therefore be clearly demonstrated that West Lothian is currently failing to provide a five-year supply of effective housing-land, and that the LDP is not necessarily directed towards delivering upon the targets set by the SDP and ratified by the Council through their membership of the SDP body.

The Housing Land Background Paper appears to be justifying the position the Council has taken in not meeting its duty to provide a five-year supply of effective housing land at all times, rather than by highlighting the issues with the supply and suggesting robust action to address the shortfall. Whilst accepting that there is a shortfall (paragraph 5.8) is an important first step, it is not appropriate for the Council to fail to address the shortfall especially as housing growth is a significant driver for the wider economic growth which the Council wishes to see in the main plan Vision.

Land at Brotherton Farm provides an attractive, accessible and effective option for the planned growth of Livingston, helping to meet specific housing land requirements in the critical 2009-2019 period, for which there is a significant and recognised shortfall.

WEST LoTHIAN LOCAL DEVELOPMENT PLAN MAIN ISSUES REPORT – Equalities opportunities questionnaire

We ask that you complete the following Equal Opportunities Questionnaire in order that we can build an accurate picture of the make-up and diversity of the people and groups that our policies impact on, and to ensure that the way in which we carry out our consultation is inclusive and not unwittingly discriminatory. If you are responding to this consultation, it would be helpful if you could complete the following questions.



Thank you for taking time to complete this questionnaire