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Town Planning and Development Consultants

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

16th October 2014

Our ref:
Your ref: WLLDP - MIR

Dear Sir,

WEST LOTHIAN LOCAL DEVELOPMENT PLAN – MAIN ISSUES REPORT SUBMISSION ON BEHALF OF CALA MANAGEMENT LTD

Please find enclosed representations made on behalf of CALA Management Ltd (CALA) in response to the Main Issues Report consultation.

The representations relate to land at Whitburn South (EOI-0123) and seek the site's allocation for housing development within the Proposed Local Development Plan. The following documents have been provided:

- Housing Land & Supply Assessment (HolderPlanning – October 2014)
- Site Specific Response (HolderPlanning – October 2014)
- Indicative Development Framework (OPEN – January 2011)

Our submission on Housing Land & Supply indicates that there do not appear to be a sufficient number of 'Preferred Sites' for housing identified within the Main Issues Report to meet the Housing Supply Target in the two periods identified by SESplan i.e. 2009 – 2019 and 2019 – 2024. Furthermore, the plan will fail to maintain a five years' effective land supply at any time.

Accordingly, a substantial number of additional effective housing sites need to be allocated to reflect the terms and requirements of SESplan and Scottish Planning Policy.

The accompanying Indicative Development Framework and Site Specific Response demonstrate the site's suitability for housing development.

CALA notes the terms of the questions posed by the Main Issues Report. Of particular relevance to this submission are the following:

Question 15 Do you agree with the Preferred Strategy for Housing Growth in West Lothian?

Question 18 Do you have another alternative strategy?

Question 19 How can the council maintain an effective five year housing land supply given the current economic climate?

The combined terms of our submission effectively provide CALA's responses to the above questions, however these can be summarised as follows;

Question 15

CALA does not agree with the Preferred Strategy for Housing Growth in West Lothian. Whilst the broad intention of providing circa 15% additional houses over and above the base supply is noted, for the reasons presented within our Housing Land and Supply Paper the Preferred Strategy fails to address the requirements of SESplan and Scottish Planning Policy both in terms of meeting the partitioned Housing Supply Target and ensuring the maintenance of an effective five years' housing land supply.

As a result, there is a pressing need to revisit and increase the number of 'new' housing sites for which allocations are required.

Question 18

CALA does not propose an alternative strategy to that proposed by the Main Issues Report. Rather, the existing preferred strategy needs to be reconsidered and amended to include a substantial number of additional effective housing sites to ensure the requirements of SESplan and Scottish Planning Policy are appropriately addressed.

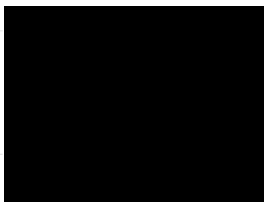
Question 19

In order to maintain an effective five year housing land supply, the Council needs to review its current over-reliance on the delivery of housing from known 'constrained' sites. Additional, effective, housing sites will be required if an effective five year housing land supply is to be maintained.

In light of the above, CALA considers there to be a clear justification and context for the identification of Whitburn South as a 'Preferred New' housing sites within the Proposed Local Development Plan.

We trust that the terms of this representation are clear and would be happy to discuss any aspect in greater detail with West Lothian Council.

Yours sincerely,



Senior Planner

HolderPlanning

West Lothian Local Development Plan Main Issues Report

On behalf of

**CALA Management Ltd
Whitburn South**

16th October 2014

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1. Introduction

- 1.1 The following submission has been prepared on behalf of CALA Management Ltd (CALA) in response to the West Lothian Local Development Plan Main Issues Report (MIR).
- 1.2 CALA is a leading provider of quality homes and places in Scotland and the UK. The company is involved in a number of community master-planning projects, and has been commended by the Scottish Government and Councils for its approach to stakeholder consultation and sustainable development.
- 1.3 This submission supports the allocation of land at Blaeberryhill Farm, or South Whitburn for housing. The site is approximately 82.91 hectares and has capacity for around 1000 new homes.
- 1.4 It should be noted that a representation was submitted on behalf of CALA, to the Council's 'Expression of Interest' exercise undertaken in 2011 (EOI-0123). Therefore, its development potential has previously been brought to the attention of West Lothian Council.
- 1.5 This representation should be read in conjunction with the previously submitted Development Framework (2011), and our representation on housing supply and demand issues, which considers the context set by SESplan and its Supplementary Guidance in terms of the housing requirements for West Lothian and the housing supply position set out in the MIR. This concludes that there do not appear to be enough Preferred Sites for housing identified in the MIR to meet the Housing Supply Target in the two periods identified by SESplan i.e. 2009 – 2019 and 2019 – 2024.
- 1.6 In our view, the development of land at Whitburn South is well placed to assist in meeting this apparent shortfall in identified housing sites. It would round off the development extent of Whitburn and could be progressed alongside proposals to the west at Heartlands, improving the housing mix in the town and providing wider planning gain and regeneration benefits.
- 1.7 The accompanying Development Framework, prepared by OPEN has been produced to illustrate the proposals and the justification that supports this location as a logical expansion area for Whitburn.

2. SESplan

- 2.1 Scottish Ministers approved SESplan with modifications on the 23rd June 2013. As a result, SESplan (as modified) constitutes the strategic development plan for the South East Scotland Strategic Development Plan Area and sets the context for the emerging West Lothian Local Development Plan.
- 2.2 SESplan identifies the whole of West Lothian as a Strategic Development Area (SDA). As indicated in paragraphs 26 and 113 of SESplan, priority will be given to housing development on brownfield sites and land within SDAs.
- 2.3 SESplan Policy 5 (Housing Land) explains that for the period from 2009 up to 2024, there is a requirement for sufficient housing land to be allocated so as to enable 107,545 houses to be built across the SESplan area. Of that total, the requirement for the period 2009 to 2019 is for 74,835 houses. It then goes on to stipulate:

“Supplementary Guidance will be prepared to provide detailed further information for Local Development Plans as to how much of that requirement should be met in each of those six areas, both in the period 2009-2019 and in the period 2019-2024”

- 2.4 The SG preparation process is now complete. Following public consultation in late 2013, the SESplan Joint Committee approved the SG for submission to Scottish Ministers on 10 March 2014. Scottish Ministers subsequently directed SESplan to modify the document.
- 2.5 In this regard it was notable that the SESplan Authority’s Proposed SG contained the following sentence in paragraph 3.13:

"Member authorities will base their calculation of the five year land supply on the period 2009 - 2024, taking into consideration housing completions."

- 2.6 On the 18th June, the Scottish Ministers issued a direction requiring this sentence to be deleted.
- 2.7 The SESplan Joint Committee considered the matter at its meeting on 30 June 2014 and recommend to the member authorities that the guidance be adopted with this modification.
- 2.8 Table 3.1 of the SG identifies West Lothian Housing Requirement as 11,420 for 2009 – 2019 and 6,590 for 2019 – 2024. In accordance with the SG, sufficient land needs to be allocated within the West Lothian LDP to enable these numbers of houses to be built in each period.
- 2.9 SESplan Policy 6 (Housing Land Flexibility) requires West Lothian Council to maintain a five year effective housing land supply at all times, and that the scale of this supply shall derive from the housing requirement identified through the SG.

2.10 SESplan Policy 7 (Maintaining a Five Year Housing Land Supply) indicates that sites for greenfield housing development proposals either within or outwith the identified SDAs may be allocated in Local Development Plans to maintain a five years' effective housing land supply subject to satisfying the following criteria:

- a) The development will be in keeping with the character of the settlement and local area
- b) The development will not undermine green belt objective
- c) Any additional infrastructure required as a result of the development is either committed or to be funded by the developer

2.11 The combination of SESplan policies referred to above requires land to be allocated in the West Lothian Local Development Plan, sufficient to allow enough houses to be built to meet the housing requirements identified in Table 3.1 of the Supplementary Guidance and to maintain a five years effective housing land supply at all times.

3. The West Lothian Main Issues Report

3.1 The MIR identifies 'Preferred Sites' and 'Reasonable Alternative' Sites for housing. Our understanding is that this consideration has been based largely upon the Council's 2011 request for 'Expressions of Interest' from landowners and developers to indicate the availability of specific sites for development. As indicated above, CALA responded to this request and made West Lothian Council aware of the development potential of Whitburn South.

3.2 Paragraphs 3.37 – 3.47 of the Main Issues Report (MIR) identified the SESplan policies and their terms, before presenting the housing requirements of the SESplan Supplementary Guidance within Figure 11. Figure 11 correctly identifies West Lothian's partitioned housing requirements i.e. 11,420 homes in the period 2009-2019 and 6,590 homes in the period 2019-2024. Paragraph 3.48 then states:

"The housing land requirement set out in Figure 11 will require to be translated into site allocations in the LDP"

3.3 Contrary to this, our analysis of the MIR and supporting background paper on Housing indicates that West Lothian Council has effectively brought together the requirements for 2009-2019 and 2019 – 2024 into a single requirement of 18,010 for 2009 – 2024. There is no basis to combine the two periods in this manner and, on this basis alone, the MIR is not consistent with SESplan Policy 5.

3.4 The MIR's strategy for meeting housing land requirements relies primarily on existing land allocations made in the West Lothian Local Plan being augmented by a number of new sites.

3.5 In this respect, the MIR's preferred Housing Land Option for the LDP is to *"plan for a total of 26,347 houses which represents 3,500 houses above the base supply"*. However, it is notable that the Council's 'base supply' figure of 22,847 units contains 8,566 units which are identified as being 'constrained' – equating to 37% of base supply.

3.6 Our detailed submission on Housing Land and Supply matters has demonstrated that the MIR's preferred strategy will result in significant shortfalls in the number of houses that are required to be delivered both in the periods 2009-19 and 2019-2024, and that the plan will fail to maintain a five years' effective land supply at any time.

3.7 Accordingly, the MIR is not consistent with SESplan and its Supplementary Guidance, or Scottish Planning Policy in respect to meeting housing land requirements. Therefore, a substantial number of additional effective housing sites need to be allocated to reflect the terms and requirements of SESplan and SPP.

3.8 The MIR recognises the regional importance of Whitburn as one of the main service and employment centres within West Lothian. Due to the strategic location and role of the town as a key economic hub, there are increasing and changing pressures on the town. A high demand for new housing, aspirations to enhance and improve the town centre and the local

environment along with the Heartlands proposals, need to be understood and balanced to help provide sustainable and appropriate solutions of a growing community.

- 3.9 Given the need for the emerging LDP to allocate a substantial number of additional effective sites to meet housing land requirement and ensure the maintenance of a five years' effective land supply, viewed alongside Whitburn's acknowledged attractiveness as a location for development, we consider it appropriate to review the town's existing settlement boundary and additional opportunities for housing development.

4. Site Assessment

- 4.1 This section presents the case in favour of the allocation of land at South Whitburn (EOI-0123). Further information is provided within the accompanying Indicative Development Framework.
- 4.2 Following assessment at the 'Expression of Interest' stage Whitburn South was not identified as a 'Preferred' Development Proposal within the Main Issues Report. The Council's assessment of the site is contained within Appendix 2b of the Environmental Report where the following conclusions were made;

"The development of the site would have the effect of extending Whitburn to the south outwith the current settlement boundary. New development of this scale would have an impact on the existing infrastructure and would have to be considered as part of any masterplan for the area. The proposed site extends beyond the eastern boundary of Whitburn towards East Whitburn and borders onto existing housing at Bickerton Crofts. There is concern that development on the full site would result in the coalescence of Whitburn and East Whitburn."

Site Description & Suitability for Housing

- 4.3 The site extends to approximately 82.91 ha and contains agricultural land. It lies to the immediate south of Blaeberryhill Road, which forms the northern boundary along with housing at Glenisla Court. To the south and east lies agricultural land, with the western boundary formed by the A706 road south to Longridge.
- 4.4 A masterplan has been developed for the site which illustrates a possible capacity of 1,000 houses and there would be a primary school within the site. Access to the site would be taken from two points on Blaeberryhill Road. The development would complete the physical extent of Whitburn to the south of the town, and could be progressed alongside the proposals at Heartlands, providing impetus to the regeneration of the town through housing development, with an associated increase in employment, population and local spending.
- 4.5 The strategic location of Whitburn South is a key benefit to the proposed new community. The site is approximately halfway between Glasgow and Edinburgh with good road and public transport links via the M8 to both cities. This central location and good transport links make Whitburn a popular place to live, recognised by the housing allocation at Heartlands. The new proposals can provide an opportunity for the further sustainable growth of the town.
- 4.6 There are committed infrastructure proposals in the local area, including the recent M8 junction at West Whitburn, which is now operational and the associated Park and Ride at the Cowhill Business Park. The site is well connected to Whitburn Town Centre by a network of footpaths and routes that run through the existing built up area.
- 4.7 We can confirm that the site meets the criteria contained within PAN 2/2010 for determining the 'effectiveness' of a site, as follows:

- Ownership:** The majority of the site is within the control of the CALA and with willing sellers, with the remainder owned by West Lothian Council
- Physical:** There are no physical constraints to the development of the site for housing.
- Contamination:** On the basis of desk based research, it is considered unlikely that the site constitutes contaminated land.
- Deficit Funding:** No public funding is required to develop housing on the site.
- Marketability:** Whitburn's highly accessible location dictates that it is a sought after location for house-buyers.
- Infrastructure:** The required infrastructure for housing development is available or can be made available by the developer.
- Land Use:** Housing is the sole preferred use in the context of this proposal..

4.8 As reference at Section 2.10, SESplan Policy 7 (Maintaining a Five Year Housing Land Supply) indicates that sites for greenfield housing development proposals either within or outwith the identified SDAs may be allocated in Local Development Plans to maintain a five years' effective housing land supply subject to satisfying the following criteria:

- a) The development will be in keeping with the character of the settlement and local area
- b) The development will not undermine Green Belt objectives
- c) Any additional infrastructure required as a result of the development is either committed or to be funded by the developer

4.9 In our view the allocation of Whitburn South for housing conforms to the requirements of SESplan Policy 7, as described below:

The development will be in keeping with the character of the settlement and local area

4.10 The proposed development provides a logical extension to Whitburn and would reflect the housing to the north of Blaeberryhill Road. It will be designed to demonstrate clear integration and linkages with the existing settlement and to reflect the emerging character of Whitburn and Heartlands.

4.11 The landscape setting of Whitburn has been a key consideration in establishing the extent and form of development at Whitburn South. Whitburn generally lies on a shallow north facing slope with the M8 passing along a natural valley, with the Bathgate Hills rising to the north. The landscape to the south of Whitburn is of a rolling character, defined by a series of low ridges. Some of the ridges act to enclose the town which lies on the north facing slopes. Further, despite being a generally open landscape, the visual horizon is dominated by modern architectural or infrastructural features, where Bathgate and Livingston are clearly visible to the east.

4.12 The character of Whitburn is changing. As the development at Heartlands progresses, the town is becoming more diverse with different styles of architecture and building materials reflecting its growth over time. Whitburn South can complement Heartlands by rounding off the development extent of Whitburn, ensuring the edges of the town are all within 2,000m of the existing town centre. Development at Whitburn South could be progressed alongside proposals at Heartlands, improving the housing mix in the town and providing wider planning gain and regeneration benefits. Development in this location is easily accessible to the town centre on foot and both the recently developed M8 junction and also the existing M8 junction 4.

The development will not undermine Green Belt Objectives

4.13 The site is not located within the Green Belt, rather it is a greenfield site. Furthermore, there are no environmental constraints to development taking place.

Any additional infrastructure required as a result of the development is either committed or to be funded by the developer

4.14 We are not aware of any infrastructure constraints that cannot be provided in accordance with this policy requirement. Furthermore, there are committed infrastructure proposals in the local area, including the recent M8 junction at West Whitburn and the associated Park and Ride at the Cowhill Business Park.

4.15 In short, therefore, we consider that the allocation of the site for housing complies with SESplan Policy 7 which is the key determining policy.

Summary

4.16 The site's development would represent a sustainable expansion to the settlement of Whitburn and be of a scale and form in keeping with the character of the settlement and local area. It is envisaged that it would be developed in tandem with development at Heartlands, however, it is important to note that it could progress in isolation of the identified development to provide an alternative development opportunity to the south of the town.

4.17 It is considered that the site at Whitburn South is ideally placed to contribute to the regeneration of the town. Furthermore, it would play an important role in helping to address the significant shortfall in effective housing land supply which has emerged upon analysis of the Main Issues Report.

5. Conclusion

- 5.1 For the reasons presented, both within this submission, the accompanying Development Framework and the associated representation on Housing Supply and Demand, CALA considers there to be a clear and justifiable case for an additional housing development allocation at Whitburn South.

- 5.2 Given the need for the emerging LDP to allocate a substantial number of additional effective sites to meet housing land requirements and ensure the maintenance of a five years' effective land supply, Whitburn's acknowledged attractiveness as a location for development dictates that it is appropriate to review the village's existing settlement boundary and consider any additional opportunities for housing development.

- 5.3 The site is capable of making an important contribution towards addressing the major shortfall in the MIR's housing land supply. Therefore, we consider that Whitburn South should be allocated in the Proposed Plan as a '*Preferred New Site*' with an indicative capacity for 1000 new homes and a primary school.

West Lothian Local Development Plan Main Issues Report

On behalf of

**CALA Management Ltd
Whitburn South**

HOUSING SUPPLY AND DEMAND

16th October 2014

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1. Introduction

- 1.1 This report considers issues relating to housing supply and demand and the adequacy of the West Lothian LDP Main Issues Report in addressing the requirements of SESplan, its related Supplementary Guidance and Scottish Planning Policy.
- 1.2 As described below, the content of the MIR is not consistent with any of these, and therefore should not be progressed in its current form.

2. SESplan and Supplementary Guidance (SG)

- 2.1 SESplan is the Strategic Development Plan (SDP), which was approved in 2013. Policy 5 (Housing Land) explains that for the period from 2009 up to 2024, there is a requirement for sufficient housing land to be allocated so as to enable 107,545 houses to be built in the SESplan area. Moreover, it indicates that the requirement for the period 2009 to 2019 is for 74,835 houses. It then goes on to say that:

“Supplementary Guidance will be prepared to provide detailed further information for Local Development Plans as to how much of that requirement should be met in each of those six areas, both in the period 2009 – 2019 and in the period 2019 to 2024”

- 2.2 In contradiction of this, analysis of MIR and supporting background paper on Housing indicates that West Lothian Council has effectively brought together the requirements for 2009 – 2019 and 2019 – 2024 into a single requirement of 18,010 for 2009 – 2024. A similar approach has recently also been adopted by City of Edinburgh Council within Proposed LDP2.
- 2.3 There is no basis to combine the two periods in this manner and, on this basis alone, the MIR is not consistent with SESplan Policy 5, the text of which was introduced by way of a modification by the Scottish Ministers to ensure that housing need and demand was met within the appropriate timescales.
- 2.4 The MIR and Housing Background Paper misinterpret SESplan Policy 5. The two partitions identified in SESplan Policy 5 relate to meeting the housing requirement in those two periods, as identified in the Housing Need and Demand Assessment.
- 2.5 Moreover, as explained below, the bringing together of these requirements has the effect of constraining the delivery of housing by not providing enough land in the first period to allow the housing requirement to be met.
- 2.6 Table 3.1 of the Supplementary Guidance identifies West Lothian’s housing requirement as 11,420 for 2009 – 2019 and 6,590 for 2019 – 2024. In accordance with SESplan Policy 5, sufficient housing land needs to be allocated within the West Lothian LDP to enable these numbers of houses to be built in each period. As explained in detail below, the MIR is deficient in this regard.
- 2.7 It is notable that the Scottish Government and an Appeal Reporter have recently addressed this matter of interpretation.

2.8 Firstly, the Scottish Government involved themselves in the context of the Supplementary Guidance. In this regard it was notable that the SESplan Authority's Proposed SG contained the following sentence in paragraph 3.13.

“Member authorities will base their calculation of the five year land supply on the period 2009 – 2024, taking into consideration housing completions”

2.9 On the 18 June, the Scottish Ministers issued a direction requiring this sentence to be deleted the final sentence of their letter stating:

“While it may be considered to provide useful further information or detail, the inclusion of this also gives rise to a potential inconsistency between SESplan itself and the supplementary guidance. Ministers therefore consider that to avoid such inconsistency, to ensure compliance with the legislation and to avoid potential further delays in the process, that the relevant sentence be removed.”

2.10 The SG has now been approved with this modification.

2.11 Secondly, a recent appeal decision (PPA-230-2124) on a proposal for housing in Ratho reached the following conclusion in respect to interpretation of SESplan Policy 5:

“Paragraph 24 -I agree with the appellant about the basis for calculating the annual average and thus the 5 year requirement. Policy 5 of SESplan clearly states in the last sentence of the first paragraph that the requirement for each council area should be met for each of the two periods. To roll them together, resulting in a much lower average requirement for the first period, would be contrary to this intention.”

2.12 SESplan Policy 6 (Housing Land Flexibility) requires West Lothian Council to maintain a five year land supply at all times and that the scale of this supply shall derive from the housing requirement identified through the SG.

2.13 SESplan Policy 7 (Maintaining a Five Year Land Supply) indicates that sites for greenfield housing development proposals either within or outwith the identified SDAs may be allocated in LDPs to maintain a 5-year housing land supply. The SDAs are identified in Policy 1A of SESplan and development principles are identified in Policy 1B. West Lothian is identified as a single SDA.

2.14 Thus, the combination SESplan policies referred to above requires land to be allocated in the West Lothian LDP sufficient to allow enough houses to be built to meet the housing requirements identified in Table 3.1 of the Supplementary Guidance. Below we explain why the MIR does not comply with this requirement.

3. West Lothian Local Development Plan: Main Issues Report (August 2014)

3.1 Paragraphs 3.37 – 3.47 of the MIR identify the above noted SESplan policies and their terms, before presenting the housing requirements of the SESplan Supplementary Guidance within Figure 11. Figure 11 correctly identifies West Lothian’s partitioned housing requirements i.e. 11,420 homes in the period 2009 – 2019 and 6,590 homes in the period 2019 – 2024. Paragraph 3.48 then states

“The housing land requirement set out in Figure 11 will require to be translated into site allocations in the LDP”

3.2 If this were the case, then we would have no objection. However, the information contained within the MIR and associated Appendices is not sufficient to verify this statement and, based upon our own analysis, we conclude that the List of Preferred Housing Site (Appendix 3) would fail to meet this objective.

3.3 The remainder of paragraph 3.48 – 3.50 provides brief commentary on West Lothian’s established housing supply, concluding that *“much of the housing requirements over the LDP plan period will therefore already be met through land allocations made in the West Lothian Local Plan”*. Paragraph 3.51 sets out the intention to allocate a number of new sites to *“augment the supply”* and *“ensure that a wider choice of housing is available, that a generous supply of housing land is provided and an effective five years housing land supply can be made available at all times”*. Appendices 1-4 set out the preferred housing allocations and suggested alternative sites, together with proposed phasing.

3.4 Paragraph 3.52 identifies the requirements of Scottish Planning Policy (SPP) that local authorities provide a generous housing land supply to meet housing needs across all tenures and to maintain at all times a five year effective supply of housing. Also the need to allocate land on a range of sites which are effective or capable of becoming effective to meet the housing land requirement up to year 10 from the predicted year of plan adoption, ensuring a minimum of 5 years effective land supply at all times.

3.5 The MIR notes at paragraph 3.53 that *“to achieve a five year effective supply at all times may result in more sites being required to be identified in the LDP for development”*. Further, at paragraph 3.54 the MIR acknowledges that there may be a need to exceed the allocations currently set out in the SDP in order to achieve a sufficiently generous housing land supply and provide an effective five year supply at all times across the plan period.

3.6 Paragraphs 3.55 – 3.62 set out three scenarios to provide for housing requirements. ‘Scenario 3’ is recommended as the preferred option. Scenario 3 states:

Provide for a total of 26,347 houses which represents 3,500 houses above the base supply

3.7 It is notable that the Council’s base supply figure of 22,847 units contains 8,566 units which are identified as being ‘constrained’ – equating to 37% of base supply.

3.8 As noted, neither the MIR or the Housing Background Paper contain sufficient information to determine how the LDP will allocate sufficient land capable of becoming effective and delivering

the scale of housing requirements for the periods 2009-2019 and 2019-2024 as identified by SESplan Supplementary Guidance.

3.9 Whilst Appendix 3 does contain a List of Preferred Housing Sites and Proposed Phasing this fails to take realistic account of delivery timescales, notably with respect to the 'new' housing sites. Given that the LDP is not scheduled for adoption until 2016, we can reasonably assume that little or no development will take place on these sites until 2017 at the earliest.

3.10 Neither does Appendix 3 appear to take appropriate account of the 'constrained' nature of many of the sites – 70 of which have been included within Appendix 3 and identified as producing outputs during the periods 2009-2019 and 2019-2024. It is crucial that this source of housing supply is underpinned by a robust explanation, supported by those that control the delivery of those sites. Otherwise they should not be counted. At present, therefore, there is significant uncertainty as to what assumption, if any, should be made for housing delivery from constrained sites.

3.11 In an attempt to address these key matters, we have undertaken our own assessment of Housing Land Needed to be provided for by the LDP. This is presented in Table 1 on page 5.

Table 1 – Housing Land Needed

Setting the LDP Housing Land Supply Target	2009 – 2019	2019 - 2024	2009 - 2024
(1) Housing Land Requirement	11,420	6,590	18,010
(2) + 15% to ensure a generous supply	1,713	989	2,702
(3) LDP Housing Land Supply Target	13,133	7,579	20,712
Meeting the LDP Housing Land Supply Target			
(4) Effective Supply 2013-2019	4,336	3,227	7,563
(5) Constrained Sites coming forward	0	0	0
(6) Housing Completions 2009-2013	1,825	0	1,825
(7) Windfall	480	400	880
(8) Demolitions	-568	-100	-668
(9) Total Supply from Existing Sources	6,073	3,527	9,600
(10) LDP Housing Land Supply Target	13,133	7,579	20,712
(11) Total Supply from Existing Sources	6,073	3,527	9,600
(12) House building Target to be met through new LDP allocations	7,060	4,052	11,112
New LDP Allocations			
(13) Estimate of Total Houses Built on New LDP Allocations	912	2281	3,193
(14) Shortfall/Surplus	6,148 Shortfall	1,771 Shortfall	7,919 Shortfall

3.12 Table 1 disaggregates the Housing Requirement into the two periods specified in SESplan Policy 5 and the Supplementary Guidance i.e. 2009 – 2019 and 2019 – 2024.

3.13 Working down the table, it is straight forward to identify the starting point which is the housing requirement +15% for each of the periods (Line 3). Paragraph 116 of Scottish Planning Policy, states:

“Within the overall housing target, plans should indicate the number of new homes to be built over the plan period. This figure should be increased by a margin of 10 to 20% to establish the housing land requirement, in order to ensure that a generous supply of housing is provided. The exact extent of the margin will depend on local circumstances, but a robust explanation for it should be provided in the plan”.

3.14 We have therefore adopted a generosity margin figure of 15% for current purposes.

3.15 The second part of the table deals with the existing potential sources of housing supply. The first component of this is the effective supply. The figure for 2009-2019 has been calculated from Housing Land Audit 2013 and excludes the ‘new’ sites within the MIR. The figure for 2019-2024 reflects the information contained with the SESplan SG Technical Note and MIR Housing Background Paper (Line 4). Clearly, this figure requires to be updated but unfortunately the Council MIR documentation does not do this.

3.16 Line 5 contains an estimate for the delivery of constrained sites. Given that the MIR and Housing Background Paper, upon our analysis, does not provide a robust explanation, supported by those that control the delivery of those sites, regarding likely development output we have concluded that constrained sites should not be counted on within Table 1.

3.17 Line 6 identifies total completions for the period 2009-2013 sourced directly from the Housing Background Paper which takes account of Housing Land Audit 2013.

3.18 Line 7 contains an assumption for the delivery of Windfall sites, but this is not justified by any evidence as required SESplan Policy 5. Notwithstanding this position we have utilised the Council’s figure of 880 homes from windfall sources during the period 2009 to 2024, which is the amount that was identified within the SESplan SG Technical Note)

3.19 Line 8 contains details of demolitions. We have taken these figures from the SESplan SG Technical Note and MIR Housing Background Paper.

3.20 Line 9 calculates the Total Supply from Existing Sources i.e. Effective Supply + Constrained + Windfall + Completions – Demolitions.

3.21 The second part of the table concludes by subtracting the existing housing supply sources from the LDP Housing Supply Targets (Line 12).

3.22 The third part of the table addresses the new LDP allocations. As noted, MIR Appendix 3 contains a List of Preferred Housing Sites and Proposed Phasing however this fails to take realistic account of delivery timescales with respect to the ‘new’ housing sites. Appendix 3 appears to be, very optimistically, assuming that new sites will deliver significant housing numbers in the period 2014-2019.

3.23 Given that the LDP is not scheduled for adoption until 2016, we can reasonably assume that little development will take place on these ‘new’ sites until 2017 at the earliest given the associated timescale to secure planning permission, and this assumes that planning applications relating to new sites are granted permission before the LDP is adopted.

- 3.24 Appendix 3 estimates that 3,193 units will be delivered by these new sites by 2024 – which is a 7 year period from 2017. Specifically, Appendix 3 assumes delivery of 2010 units (2014-19) and 1183 units (2019-2024). As an estimate it might therefore be reasonable to assume that 2/7 of 3,193 will be built in the period to 2019 (i.e. 912) which is the figure we have used at Line 13 in the 2009 – 2019 column. The remaining 2,281 units have been programmed across the 2019 – 2024 period. This is a rough calculation, and it is essential that the Council, in preparing the Proposed LDP, make as accurate an assessment as possible of the delivery programme of new sites.
- 3.25 Line 14 subtracts the estimate of total houses built on new LDP allocation (Line 13) from the House Building Target to be met through new LDP allocations (Line 12) to determine whether an overall shortfall or surplus exists.
- 3.26 This demonstrates that within the period 2009 – 2024 there is a significant shortfall in the number of houses that are likely to be delivered as an outcome of the MIR strategy. In the first period there is a shortfall of 6,148 homes to be precise (Line 14). Within the period 2019 – 2024, there is a shortfall of 1,771 houses. It should be noted that this shortfall in the second period is in addition to the shortfall in the first period. Therefore, overall, by the end of 2024 there will be a total deficit of 7,919 houses.

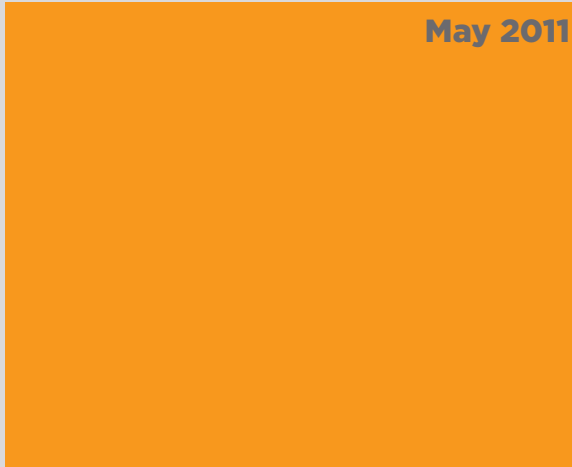
4. Conclusion

- 4.1 The MIR is not consistent with SESplan and its Supplementary Guidance, or Scottish Planning Policy in respect to meeting housing land requirements. A substantial number of additional effective housing sites need to be allocated, and various sections of the MIR need to be rewritten to properly reflect the terms and requirements of SESplan and SPP. Additional analysis is also required to substantiate the basis for assumptions on supply flexibility and housing delivery from constrained sites.

WHITBURN, CALA Management Ltd

PROPOSAL FOR DEVELOPMENT

May 2011



Development at Whitburn South

Development at Whitburn South is promoted by CALA Management Ltd (CALA) to the emerging review of the Edinburgh City Region Plan and West Lothian Local Development Plan review thereafter as a residential development site for up to 1,000 units, including a new primary school within the site. Initial proposals for the site, which lies to the south of the town and Blaeberryhill Road are illustrated on the aerial photo.

The development of the site would take place in the context of the emerging Edinburgh City Region Plan, and committed transport infrastructure proposals including a new M8 junction at west Whitburn, the associated express bus park and ride facility at the Cowhill Business Park, and park and ride facilities associated with the reopening of the Airdrie to Bathgate rail link.

The development of the site would round off the development extent of Whitburn to the south of the town, and could be progressed alongside the proposals at Heartlands, providing impetus to the regeneration of the town through housing development, with an associated increase in employment, population and local spending.

Purpose of Document

In 2010, in response to the SESplan Main Issues Report, CALA indicated the potential of land at Whitburn South to accommodate sustainable development that could contribute to the achievement of some of the main objectives of SESplan. The purpose of this document is to explain in more detail what can be achieved on the site, describe the relationship of the proposed development to its surroundings and the benefits that development in this location might offer.

CALA welcomes the opportunity to engage with West Lothian Council to demonstrate how an appropriately designed sustainable extension to Whitburn in this location could help to achieve the aims of the emerging Local Development Plan. The document is structured as follows;

- 1. Introduction** - Introducing the study area.
- 2. Planning Context** - A Summary of the planning context.
- 3. Site Context** - Establishes why development is appropriate in the Whitburn South area and the relationship with the existing town.
- 4. Development Proposals** - Presents an outline development proposal that illustrates the potential at Whitburn South to deliver a sustainable urban expansion.
- 5. Benefits** - Describes some of the key benefits development in this location will offer the existing community.
- 6. Summary**



Fig. 01: Proposed Whitburn South development location..

1. Introduction

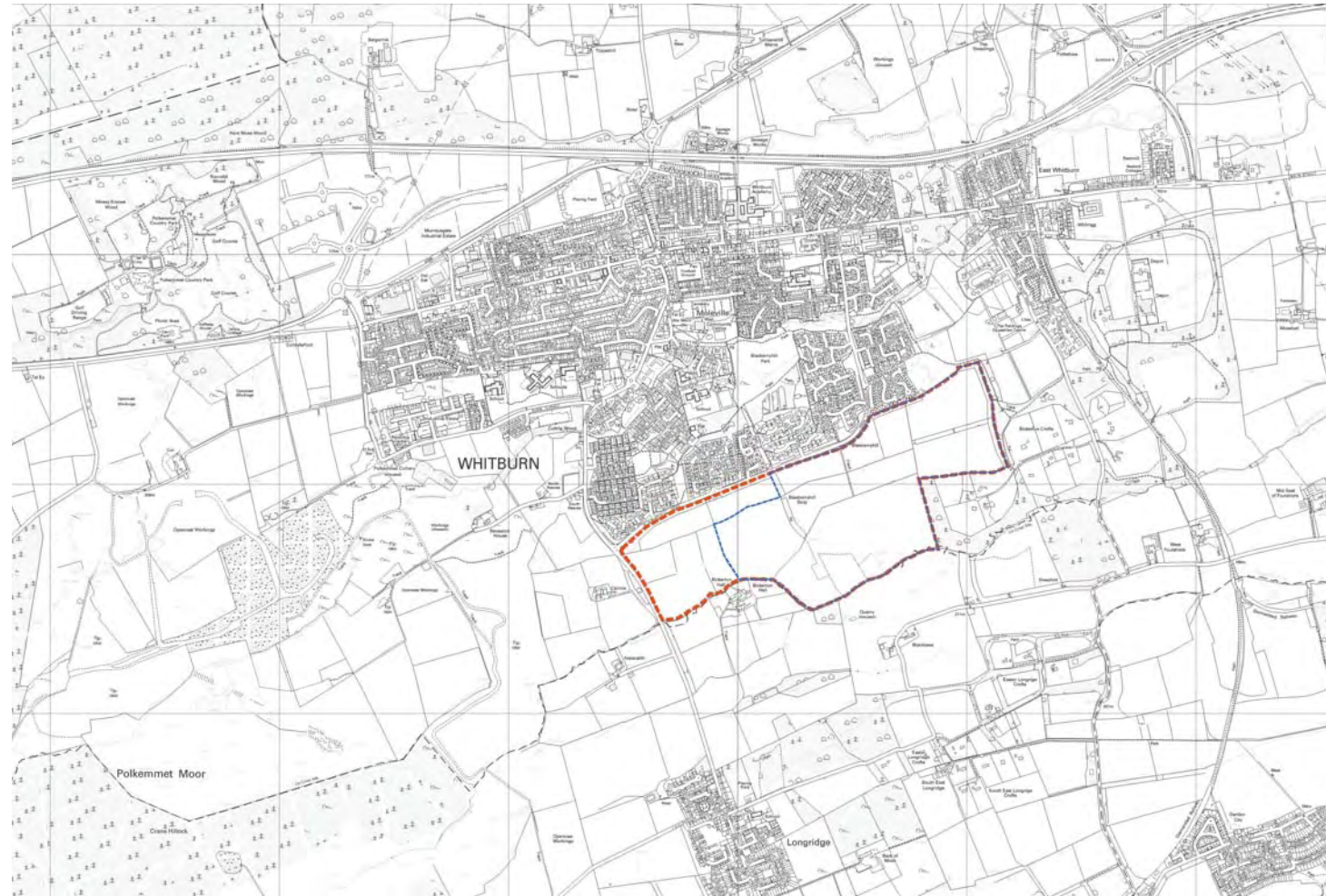


fig. 02: Site Location and land under control of CALA indicated by blue line.

Scale: nts

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1.1 Site Location

The site area at Whitburn south, illustrated above, is approximately 82.91 hectares (204 acres). The extent of land controlled by CALA is 63.54 hectares (157 acres), which does not include West Lothian Council land and Bickerton Farm to the west of the site.

The site lies to the immediate south of Blaeberryhill Road, which forms the northern boundary along with housing at Glenisla Court. To the south and east lies agricultural land, with the western boundary formed by the A706 road south to Longridge. The landform within the site rises up gently from Blaeberryhill Road, to a natural escarpment above the Bickerton Burn, which runs on a south westerly-north easterly course at a much lower level. This escarpment lends some enclosure to the site, when viewed from Blaeberryhill Road and offers a sensible and practical location edge to the visual envelope of the settlement. The site is generally open in character although there are some existing tree belts and individual trees and hedges that provide localised enclosure. The Burn marks the southern boundary of the site and the south facing slopes leading down it offer an opportunity for environmental and recreational enhancement, connected with the network of footpaths that exist in the local area.

The site is well connected to Whitburn Town Centre by a network of footpaths and routes that run through the existing built up area. These paths are also interconnected with the White Burn corridor, and Blaeberryhill Park, which provides a local amenity to residents.

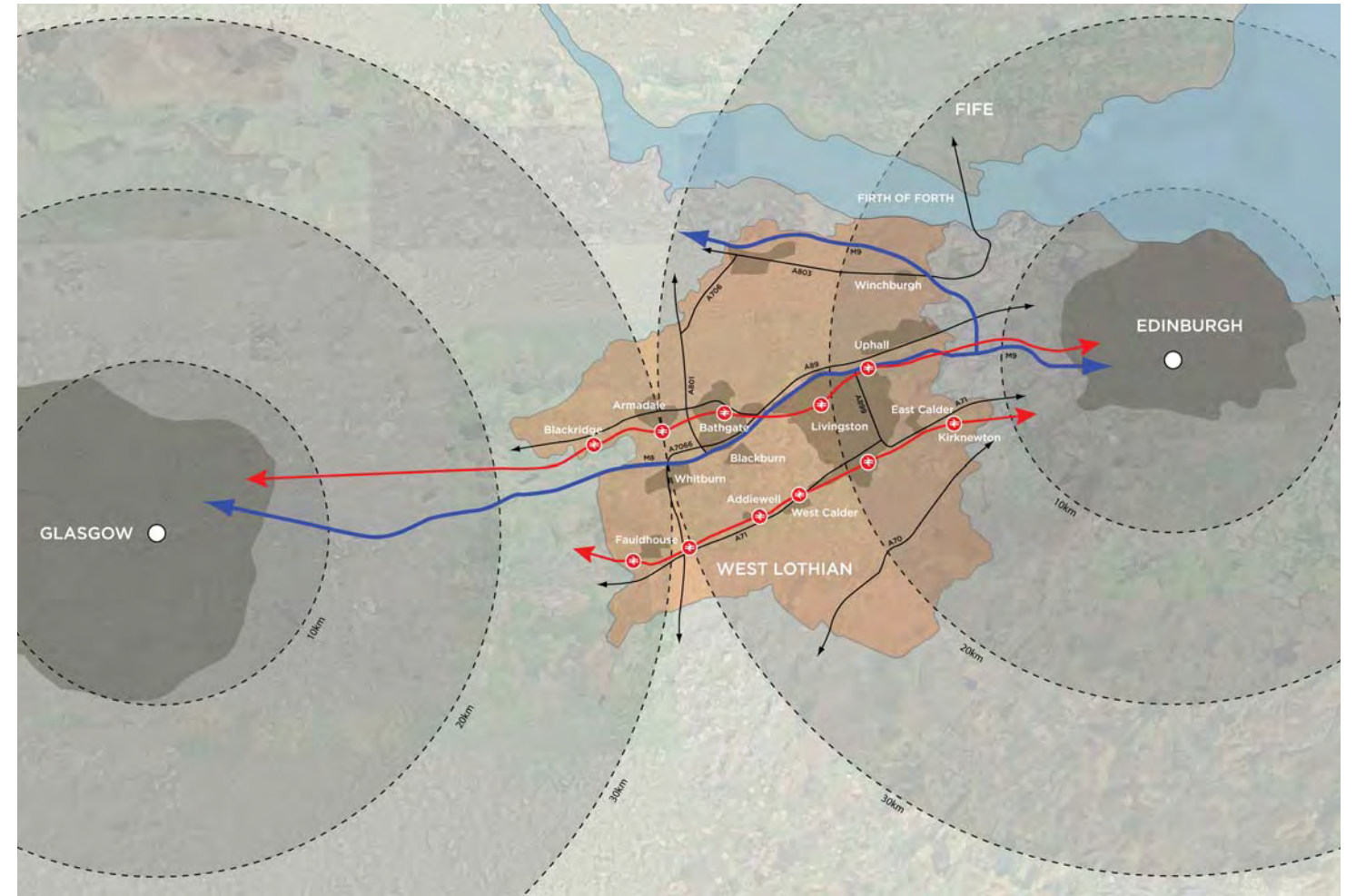


fig. 03: Strategic site location.

Scale: 1:400,000

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1.2 Strategic Context

The strategic location of Whitburn South is a key benefit to the proposed new community. Located within West Lothian the site is approximately half way between Glasgow and Edinburgh with good road and public transport links via the M8 to both cities. A new junction on the M8 will further improve these road links both within West Lothian and central Scotland. Whitburn is also within close proximity to a number of rail stations including Bathgate and Armadale.

This central location and good transport links make Whitburn a popular place to live, recognised in the Finalised West Lothian local Plan 2005 by the housing allocation at Heartlands and proposed new Motorway junction. The new proposals described in this document can provide an opportunity for the further sustainable growth of the town.

The Local Development Plan recognises the regional importance of Whitburn as one of the main service and employment centres within West Lothian. Due to the strategic location and role of the town there are increasing and changing pressures on the town. A high demand for new housing, aspirations to enhance and improve the town centre and the local environment along with the Heartlands proposals, need to be understood and balanced to help provide sustainable and appropriate solutions of a growing community. All these aspects have been considered in the proposals, opportunities and potential benefits described in this document.

2. Planning

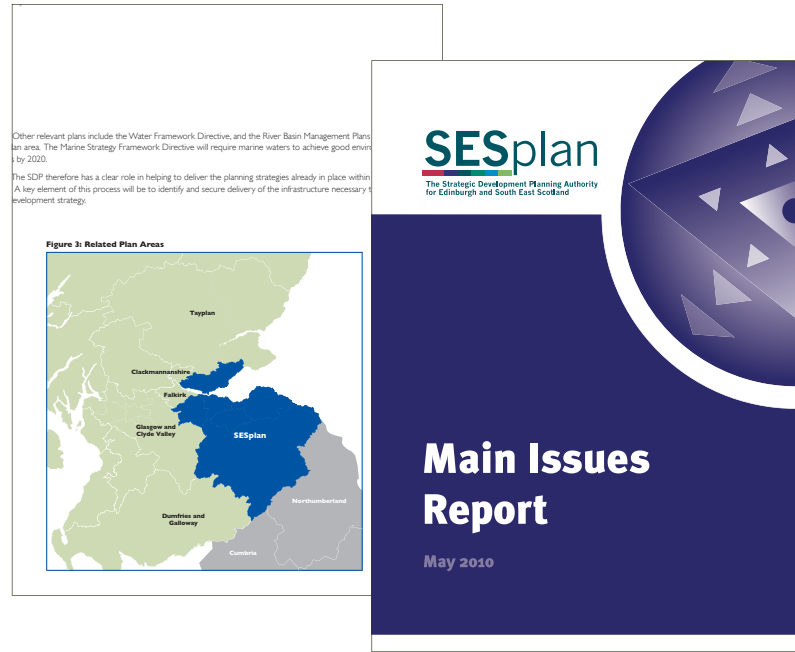


fig. 04: SESplan Main Issues Report.

2.1 Planning

The South East Scotland Development Plan Authority (SESplan) which includes the City of Edinburgh, East Lothian, Fife (south), Midlothian, Scottish Borders and West Lothian Councils is preparing a new Strategic Development Plan for South East Scotland. This is a strategic planning document, the first stage of which was the publication, in May 2010, of a Main Issues Report (MIR) for public consultation. The consultation period on the MIR ended in late August. The SESplan Councils are currently considering responses received during the consultation period before issuing a Proposed Plan, expected in November 2011.

In parallel with this process, West Lothian Council is beginning to prepare the West Lothian Local Development Plan (WLLDP), which will contain planning policies and site specific land use proposals to meet the requirements identified in SESplan. Indeed, our proposal for development responds to the Council's "Call for Sites" intended to inform the preparation of the WLLDP.

The SESplan Main Issues Report is the most recent expression of the emerging planning policies for West Lothian. In respect to housing, the preferred approach identified in the MIR is that an 5,750 houses are provided in addition to the current housing allocations contained in the West Lothian Local Plan. It indicates that these homes should be provided in the latter half of the SESplan i.e. post 2019. Moreover, it is stated that the smaller settlements in west West Lothian (e.g. Whitburn) may accommodate growth, reliant on being linked to community regeneration, taking advantage of enhanced transport infrastructure arising from the Airdrie to Bathgate rail line and improvements to the Shotts line. We support this strategy and we believe CALA can assist in achieving it.

As we explain in our submission, it is considered that the site at Whitburn South is ideally placed to contribute to the regeneration of the town, whilst contributing to meeting the wider housing requirements in the region.

3. Context



fig. 05: Landscape Setting.

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3.1 Landscape Setting

The landscape setting of Whitburn has been a key consideration in establishing the extent and form of development at Whitburn South. Whitburn generally lies on a shallow north facing slope with the M8 passing along a natural valley, with the Bathgate Hills rising to the north. The landscape to the south of Whitburn is of a rolling character, defined by a series of low ridges. Some of the ridges act to enclose the town which lies on the north facing slopes.

View 1 from Longridge towards Whitburn shows how the rolling landscape acts to conceal the southern edge of Whitburn. The secondary ridgeline highlighted on figure 5 is an important feature in enclosing development and should form a robust edge to the Whitburn South development.

Despite being an open landscape, the visual horizon is dominated by modern architectural or infrastructural features; this can be seen in view 1 opposite where Bathgate and Livingston are clearly visible to the east.

Further north view 2 towards Whitburn beyond the smaller ridge, which acts to enclose the town, illustrates how woodland planting has further acted to enclose the southern edge of the town.

View 3 towards the town highlights the secondary ridge with the southern edge of the town just visible on the horizon.

The observations on the landscape setting to the south of Whitburn have been carefully considered and used to direct the extents, the location and form of development and the proposed landscape structure of development at Whitburn South.



fig. 06: View 1, north east to Whitburn from west of B7010.



fig. 07: View 2, north to Whitburn south of junction to Blaeberryhill Road.



fig. 08: View 3, north west towards Whitburn.

3.2 Urban Context

Through considering the structure of the existing town, along with all the proposed and potential development areas, the overall development pattern of the town can be considered in the context of future growth and potential benefits and issues to be understood.

Historical Growth

The historic plans opposite are intended to illustrate how Whitburn has grown over the years, as a result of a series of ever changing influences. The historic plans assist in understanding the structure of the existing settlement, and in establishing the context for future growth.

Until 1898 it was a small rural village in a typical linear form centred on the main road.

The 20th Century and the development of Polkemmet Colliery saw considerable growth to the town, both to the north and the south of the main road. The development of the A8 further influenced the growth of the town to the north.

As the town has continued to grow through the period between 1960 to 1980 the development of the M8 motorway has further influenced continued growth with improved links to central Scotland via junction 4. The alignment of the M8 has also acted to restrict future growth of the town to the north beyond the current Development Plan period.

The historical analysis of the town illustrates how it has continued to change and evolve in response to ever changing social, environmental and economic pressures. These pressures have varied through the years and have shaped and will continue to shape the town in a number of ways.

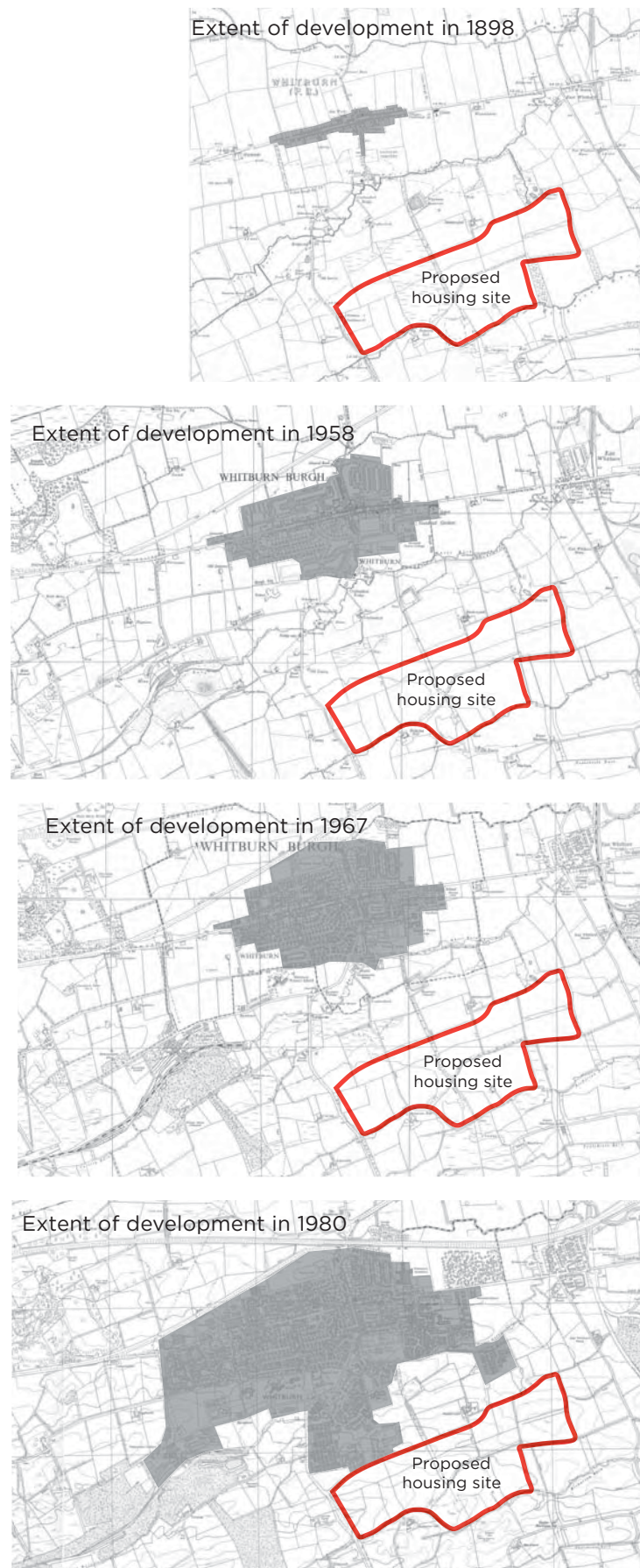


fig. 09: Analysis of historical growth of Whitburn.

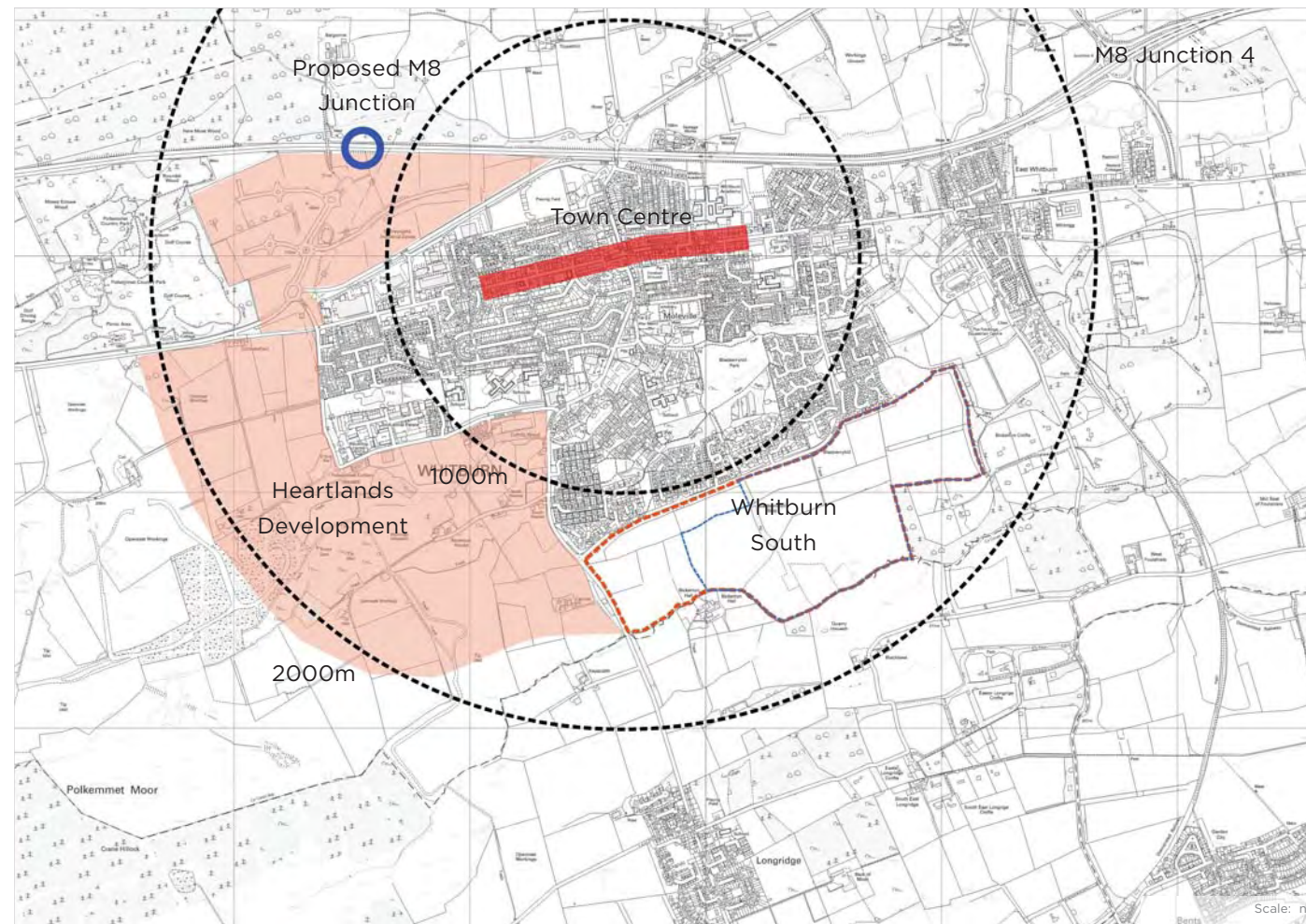


fig. 10: Whitburn South in urban context.

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Future Growth

The immediate future growth of Whitburn is identified in the major housing allocation proposed to the west and south of Whitburn at Heartlands. The site was granted outline planning consent for 2,000 residential units, 1.5m sq ft of business and industry, 2 championship golf courses and neighbourhood shopping and community facilities in November 2003. The Heartlands proposals include the construction of a new M8 motorway junction to the west of junction 4. The new junction will link with a public transport interchange within the Heartlands development and the safeguarding of a 350 space express bus park and ride facility and also a new Business Park.

To complement the proposed development at Heartlands, Whitburn South could act to round off the development extent of Whitburn, ensuring the edges of the town are all within 2,000m of the existing town centre. Development at Whitburn South could be progressed alongside proposals at Heartlands, improving the housing mix in the town and providing wider planning gain and regeneration benefits. Development in this location is easily accessible to the town centre on foot and both the new M8 junction and also the existing M8 junction 4.

3.3 Relationship to town

The location of the potential development site on the southern edge of the town is an important aspect to consider. Development should be designed in such a way as to ensure good integration with the existing town, whilst respecting the privacy and setting of the existing properties, providing good links between the neighbouring communities and the town centre. The northern boundary of the site meets the town along the single sided Blaeberryhill Road. A number of paths, streets and areas of open space allow good opportunities for integration of the Whitburn South development area with the existing town and good access to the town centre.



fig. 11: View west along Blaeberryhill Road, illustrating the site boundary and relationship with existing housing.



fig. 12: Path network on Blaeberryhill Road with clear links to town centre.



fig. 13: View into the eastern part of the site from Bickerton.



fig. 14: View of existing path from Blaeberryhill Road to Blaeberryhill Park.



fig. 15: View east along Blaeberryhill Road.

3.4 Urban Integration

The Whitburn South proposals should carefully consider integration with the existing town and how best the new urban expansion can be developed to feel like part of the town. A study of the existing amenities and paths was completed to take account of the opportunities for integration, some of these are highlighted on the plan below with some shown in the photos opposite. These opportunities for integration with the existing town are recognised and included within any development proposals for the site. Further opportunities should be made to ensure integration between the communities' connecting streets and spaces.

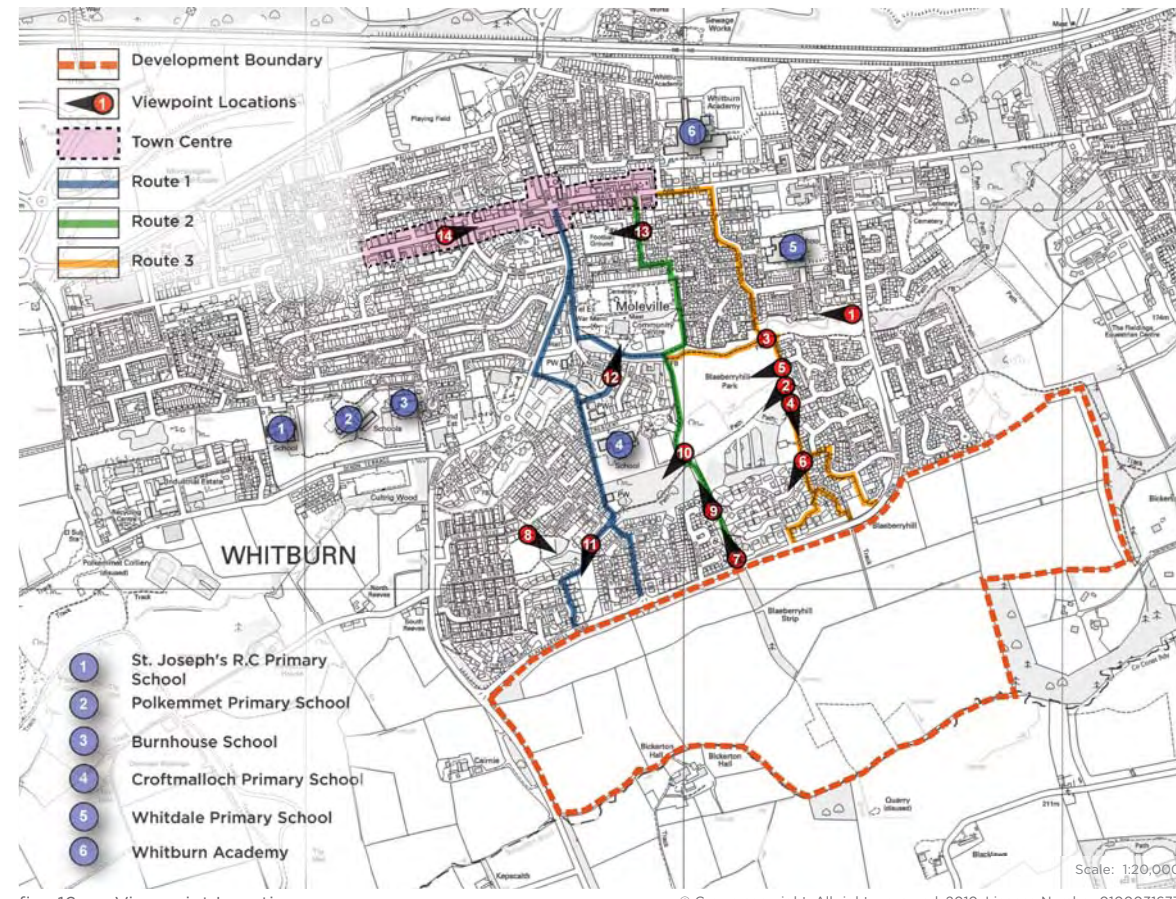


fig. 16: Viewpoint Locations © Crown copyright, All rights reserved, 2010, Licence Number 0100031673



Viewpoint 01



Viewpoint 02



Viewpoint 03



Viewpoint 04



Viewpoint 05



Viewpoint 06



Viewpoint 07



Viewpoint 08



Viewpoint 09



Viewpoint 10



Viewpoint 11



Viewpoint 12



Viewpoint 13



Viewpoint 14

4. The Development Proposals

4.1 Development opportunity

This part of the document provides information on the evolving proposals for residential development on land at Whitburn South. The outline Development Framework has been produced to illustrate the proposals developed following the site analysis and consideration and to provide further justification to supports this location as a logical expansion area for Whitburn.

4.1.1 Strategic Concept

With the location and extent of development at Whitburn South directed by the landscape setting and proximity to the town centre, a key aim of the layout has been to ensure the development fits with the urban pattern - 'rounding off' the southern extents of the town. Figure 17, the strategic concept, illustrates how along with development at Heartlands the Whitburn South proposals can offer potential opportunities for improved recreational networks and transport links as part of a wider urban structure.

A strong landscape structure along the southern edge of the development will ensure it fits well within the wider landscape minimising the visual impact on views from the south. This strategic landscape edge also offers recreational opportunities with links to Blaeberryhill Park, the proposed Golf courses at Heartlands and further to Polkemmet Country Park as part of a open space network.

4.1.2 Development Concept

The key aim of the development is to ensure good integration with the neighbouring residential areas to the north and new development to the west at Heartlands. Good integration could be achieved through strong and improved pedestrian links and landscape corridors connecting the key areas of public open space. Importantly, the development allows opportunity for transport improvements, with potential future links and connections explored as part of the development proposals.

4.1.3 Whitburn South

Following a process of site analysis and evaluation an Illustrative Development Framework has been drawn up and is indicated in Figure 21. The framework illustrates a gross development area of 67 hectares, with the extent of land controlled by CALA being 63.54 hectares (i.e. not including WLC land, and Bickerton Farm to west of site).

The development proposals recognise the landscape form of the site and in particular the prominence of the southern portion which lies below a pronounced ridge line running east west on the approach to Whitburn from the south. Limiting development to this area reflects the approach taken on land to the west as part of the Heartlands proposals.

In terms of the southern and easternmost parts of the site, south of the 'escarpment', this area is considered to breach the natural capacity of the site and has been integrated as a part of a network of connected open space, while the topography of the prominent hill to the east also serves to provide a separation between the site and existing development at Bickerton Crofts/ East Whitburn.

Part of the land within the proposed housing site is owned by West Lothian Council, and it is suggested that this should form part of the overall vision for the area. In addition to land for housing, CALA is also proposing that land should be provided for a new Primary School, subject to WLC Education Department requirements.

The proposals therefore illustrates a net development area of some 39.56 hectares (97.75 acres). At an assumed overall housing density of 10 units per acre, this would allow for in the region of 1,000 units at a variable density, and of a variety of types including family and affordable housing and depending on requirements for open space or other land uses.

CALA is committed to the delivery of a high quality environment for its developments and will promote the design of a strong landscape and connected open space structure as part of a future Master Plan. It is CALA's intention that a Master Plan will be developed in an integrated and involved way with officers of the Council and the local community. CALA's approach at the Winchburgh Core Development Area is testament to its commitment to inclusive design and it welcomes the Council's engagement in the Master Plan process.



fig. 17: Strategic Concept © Crown copyright, All rights reserved, 2010, Google Pro

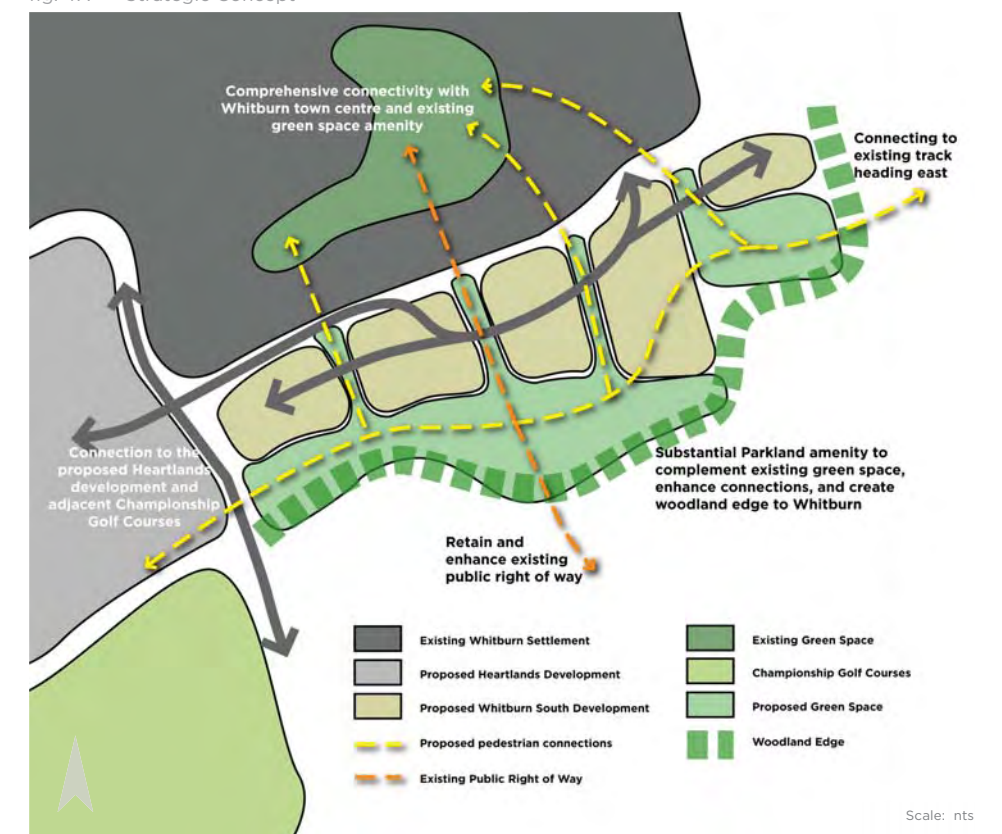
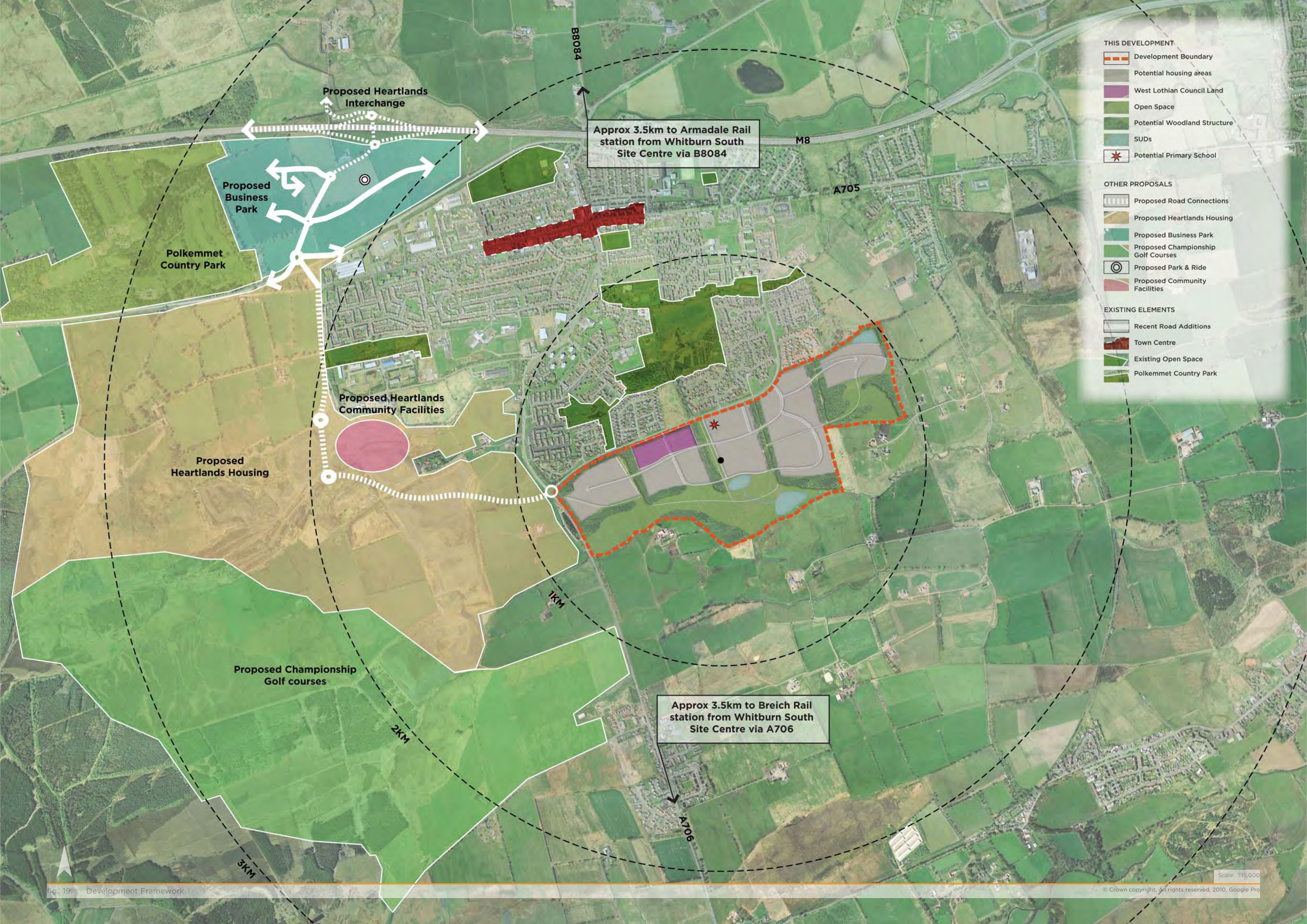


fig. 18: Development Concept © Crown copyright, All rights reserved, 2010, Google Pro



- THIS DEVELOPMENT**
- Development Boundary
 - Potential housing areas
 - West Lothian Council Land
 - Open Space
 - Potential Woodland Structure
 - SUDs
 - ★ Potential Primary School

- OTHER PROPOSALS**
- Proposed Road Connections
 - Proposed Heartlands Housing
 - Proposed Business Park
 - Proposed Championship Golf Courses
 - Proposed Park & Ride
 - Proposed Community Facilities

- EXISTING ELEMENTS**
- Recent Road Additions
 - Town Centre
 - Existing Open Space
 - Polkemmet Country Park

Fig. 19: Development Framework.

Scale: 1:15,000

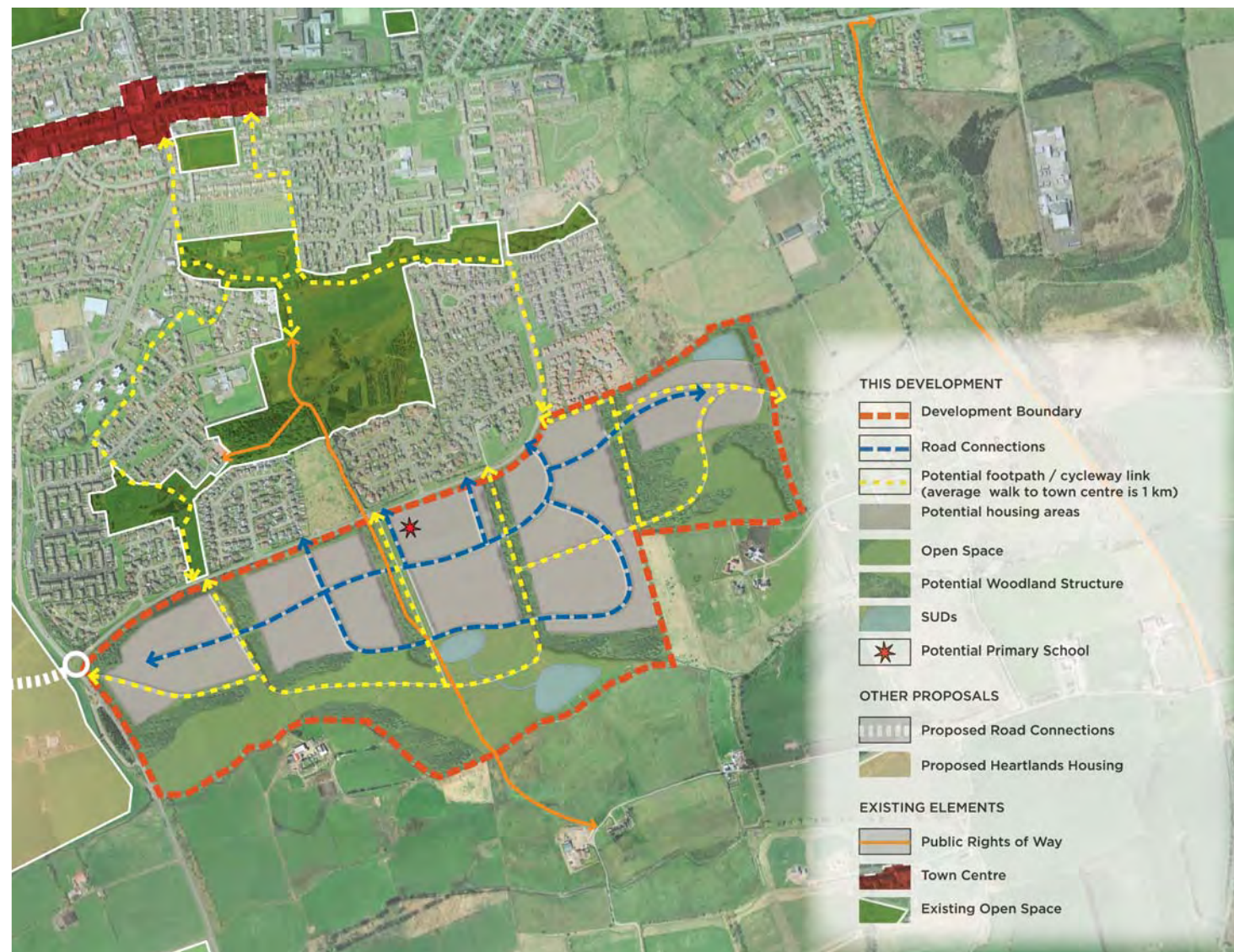


fig. 20: Access and connections.

4.2 Connections and Access

A key aim of the development concept at Whitburn South has been to ensure it is well integrated and connected to the existing town. The plan above illustrated how through proposed and enhanced footpaths, connections can be made to the existing town and importantly areas of interest such as the town centre, schools and public areas of open space. It is important to note that existing footpaths including public rights of way have been incorporated into the path network illustrated.

Planning Advice Note 75 – Planning for Transport (PAN75) (Scottish Executive, August 2005) sets out typical walking thresholds to local facilities. For access to local facilities, a maximum walking threshold of 1,600m (approx. 20 minutes) is broadly in line with observed behaviour. Figures 19 and 20 illustrate the area covered by the walking catchment and shows the principal destinations within this catchment to be served by the pedestrian network including the town centre.

The proposed internal street layout shown in the framework is illustrative only and all streets will follow the principles set out in the Scottish Governments document ‘Designing Streets’. Following the principles set out in this document will further act to ensure the development is better integrated into the existing town.

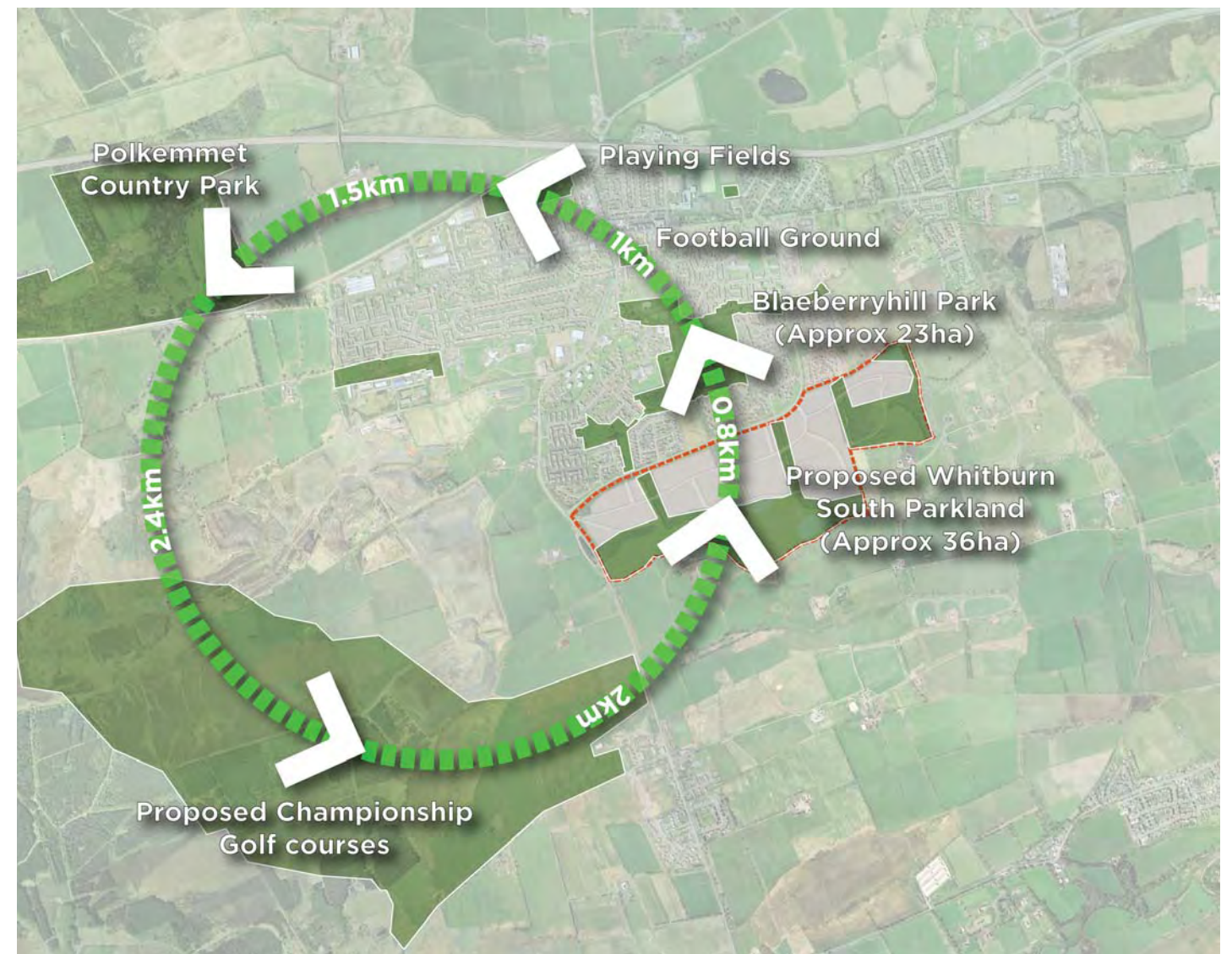


fig. 21: Open space network.

4.3 Green Links

The strategic landscape framework is proposed to provide a sensitive setting for the development maintaining a green edge to the southern edge of the town in line with the Heartland proposals and provide valuable and attractive public open space for the community. The strategic landscape should include areas of structure planting, SUDs and appropriate footpath links (including existing rights of way) and should be publicly accessible. It is envisaged that the proposed Whitburn South park fits as part of a wider open space network connecting key public spaces such as Blaeberryhill Park, Polkemmet Country Park and open spaces within Heartlands. Green links should follow the alignment of the existing field boundaries providing structure to the development whilst integrating the parkland through the development.

A sustainable urban drainage system (SUDs) will be incorporated in the landscape framework at Whitburn South -Sustainable urban drainage features will form an integral part of the landscape framework and represent how the development will aim to maximise the site’s ecological and habitat value.

5. Benefits

Development Benefits

Development at Whitburn South would offer a number of opportunities and benefits for both the existing and proposed communities. These could include new public spaces, potential for a new primary school, improvements to the existing Whitburn town centre and opportunities for improved transport connections. It will be developed in a manner that promotes good integration with the existing town, including the Heartlands development, ensuring that the neighbouring communities all benefit from the proximity to local facilities and importantly are located within walking distance to the town centre and new business park, helping to promote and sustain the town as an attractive place to live and work.

This section outlines some of the key benefits that development at Whitburn South could offer the town and how these could integrate with the existing community.

Education

Requirements for educational provision in the long term planning of Whitburn South were informed by West Lothian Council in June 2007 and an update on the schools position is intended.

In terms of Primary Education, there are 4 existing Primary schools in the town, the nearest to the site being Croftmalloch, along with Polkemmet, St. Joseph's and Whitdale. All of these schools are currently operating below capacity.

Much of this spare primary capacity will be taken up by the committed Heartlands development. Using West Lothian Council pupil generation figures, it is estimated that the 2,000 units at Heartlands will generate some 560 non denominational primary pupils, against a capacity of 414. It is therefore a requirement of the Heartlands scheme that funding is provided for extensions to the non denominational primary schools to cover the shortfall of 146 pupil places (as agreed in the Section 75 legal agreement). A small extension will also be required for the denominational St Joseph's primary.

For 1,000 units at Blaeberryhill Farm, an additional 280 non denominational primary pupils would be generated. Therefore, a new single stream primary is proposed to serve the development. A new primary school within the development will create a centre for the community with safe routes to school, a considerable benefit for the proposals.

In terms of Secondary Education provision, the site lies within the catchment area for the Whitburn and St Kentigern's Secondary Schools.

Again, proposals at Heartlands will take up any spare school capacity at Whitburn Academy. Already the subject of PPP proposals for redevelopment, a further extension is likely to require funding via changes to the PPP contract. Further work will be required to see how the new Roman Catholic secondary provision will be able to cope with the new development, without changes being required to school catchment areas.

Transport

The Whitburn South proposals illustrate vehicular access to the site from Blaeberryhill Road at least two principal points, a requirement for a development of this size. The configuration of Blaeberryhill road is considered to be acceptable in terms of being able to form these junctions at adequate distances and being able to accommodate the additional traffic. While the new motorway junction to the west at Heartlands will greatly help access to the town,, it is considered that the additional traffic generated by the Whitburn South development will require improvements to off site junctions on the local network.

SPG issued by West Lothian Council in June 2006 requires developments in the wider East Whitburn area to contribute financially to proposals to upgrade (by dualling) the A801 between the M8 Junction 4 and the Pottishaw roundabout to the north. This site lies within the area designated as likely to have an impact on this junction, and a contribution commensurate with the level of traffic generated and impact on the junction will be considered.

In more local terms, the Blaeberryhill Rd/East Main Street junction might require to be improved, involving road widening on the junction approaches to accommodate space for additional queuing.

Additional improvements to the pedestrian links to the network of paths leading to the town centre via Blaeberryhill Park as indicated in Figures 16 and 17 will be considered. These are important to provide safe routes to school, the town centre and for wider recreation. CALA is willing to make a contribution to the enhancement of these routes and spaces, working closely with West Lothian Council, to achieve a positive environmental enhancement.

While Whitburn will have benefited from the reopening of the Bathgate to Airdrie rail link and the proposed express bus park and ride, its proximity to Breich (approximately 2 miles to south of site), on the Edinburgh to Glasgow line via Shotts line also offers benefits for increased sustainable transport use with the proposed upgrade of the Shotts line, as noted in the Structure Plan. Services at Breich are currently limited due to demand, however additional development at Whitburn South (and Heartlands) could provide additional passenger demand.

Whitburn Town Centre

In cooperation with the Town Centre Management Group, local business and community groups, CALA would be prepared to offer real improvements to the public spaces and environment of the town centre.

In accordance with the Council's SPG on Developer Contributions to Town and Village Centre Improvements (May 2006), a standard charge of £250 per dwelling (plus indexation) would apply to new houses constructed in the CDAs. Notwithstanding the site being outwith a CDA, for a development of 1,000 dwellings at Whitburn South this would equate to a contribution of £250,000 for the town centre fund which CALA would be prepared to offer as a contribution towards improvements.. The types of improvements envisaged are landscape works and maintenance; street furniture and lighting; litter management and recycling; crime prevention measures; improved public

transport facilities; signage and information; marketing and promotion; car park improvements; town centre studies; site assembly and servicing; traffic calming; and CPO.

A Town Centre health check was undertaken on behalf of CALA Homes by Turley Associates in March 2007, to establish the current vitality and viability of Whitburn town centre and opportunities for improvements. It concluded that the town centre has an above average level of vacant units, poor physical environment and poor standard of public realm. Possible improvements identified include; paving of public footpaths in the town centre, planting schemes, improved street furniture, public art, conservation signage and façade improvement treatments. These improvements are in line with those supported by the town centre financial contribution option outlined above.

Economic Impact of Whitburn South

In addition to financial contributions required or offered as set out above, the development of Whitburn South would increase the local population and expenditure, directly benefitting the vitality and viability of the town centre through additional income to the authority.

An impact appraisal assessed the investment and market economic impacts generated by the proposed 1,000 unit development at Whitburn South. This concluded:

Capital investment in construction, flowing from house, development and infrastructure costs = £172.9m

Employment flowing from this capital investment - annual 'employment effect' of £17m p.a (i.e. with investment of £173m spread over a 10 year period) = 357 full time equivalent jobs

The impact of the residential development on retail expenditure - Whitburn South's population will provide a major source of retail expenditure with an estimated eventual population of 2,500 people. This is estimated to equate to an expenditure in retail terms of £6.2m.

The impact of the residential development on council tax receipts - Council tax revenues for West Lothian Council would be increased by the proposed Whitburn South development due to existing residents trading up to higher value properties; and new residents moving in to the Council area. It is estimated that the annual increase in income would be £700,000.

It is concluded that there would be real benefits to Whitburn through investment by the developers and income generated by the residents. These figures are abbreviated from the report commissioned to inform the SESplan submission and the full information can be provided if required.

6. Summary

Development at Whitburn South as described in this document offers an excellent opportunity for the long term sustainable expansion of the town in line with the aims of the Development Plan. It is envisaged that it would be developed in tandem with development at Heartlands, however, it is important to note that it could progress in isolation of the identified development to provide an alternative development opportunity to the south of the town.

The Edinburgh and the Lothians Structure Plan 2015 notes that 'further expansion of Bathgate/Blackburn and Whitburn may be considered when existing large development sites are well progressed' The Whitburn South site, with up to 1,000 units proposed, could develop alongside the long term proposals at Heartlands for upto 2000 units. This would allow Heartlands to be established and provide impetus to the regeneration of the town and increasing its attractiveness and choice in terms of housing demand. A total allocation of around 3,000 units would be similar in scale to that directed to Armadale and Bathgate by the existing Development Plan.

Considering the above, the Whitburn South site as shown in Figures 19 is commended as a residential development site for up to 1,000 units and including a primary school within the site to serve the development.

The development of the site would take place in the context of the emerging Development Plan, and committed transport infrastructure proposals including the new M8 junction at west Whitburn, the associated express bus park and ride facility, and park and ride facilities associated with the reopened Airdrie to Bathgate rail link.

The development of the site would round off the development extent of Whitburn to the south of the town, and could be progressed alongside proposals at Heartlands, providing impetus to the regeneration of the town through housing development, with the associated increase in population and local spending. It is considered that the site at Whitburn South is ideally placed to contribute to the regeneration of the town, whilst contributing to meeting the wider housing requirements in the region.

7. Appendix A - Engineering Overview

7.1 INTRODUCTION

Quattro Consult Limited have been requested to undertake an engineering overview of the proposed development site at Blaeberryhill Road Whitburn. The following overview deals with the primary development considerations.

7.1.1 FLOOD OVERVIEW

A review of the SEPA Flood Mapping has been undertaken for the proposed development site at Whitburn. This review has indicated that there is no record of flooding within the area identified as a potential future development site.

A full surface water drainage strategy will be undertaken at the appropriate planning stage to identify the available points of discharge for future SUDs facilities.

7.1.2 WHITBURN - GEO ENVIRONMENTAL OVERVIEW

Geoenvironmental Considerations

A review has been undertaken to consider the Blaeberryhill Road site, Whitburn site with respect to Part IIa of the Environmental Protection Act 1990 in order to assess its potential to constitute contaminated land.

This review has confirmed that there is limited potential pollutant linkages identified at the site.

OS historical maps indicate that the site has had an agricultural use from the first edition map to present day. There is evidence of a small infilled pond in the southern area. There is the potential for made ground and ground gas however the overall risk to future site users is considered to be low.

The surrounding land use has a limited industrial land use limited to small quarries and collieries to the east and west.

On the basis of desk based research conducted to date it is considered unlikely that the site in its current state would constitute Contaminated Land, as is defined in Part IIa of the Environmental Protection Act 1990.

Geotechnical and Mining Considerations

The site is underlain principally by Glacial Till (Boulder Clay). Local areas of Disturbed Ground and Alluvium are present. The latter is associated with watercourses and (infilled) ponds. Rock is at or near surface in local areas, generally in association with watercourses or the area of Disturbed Ground in and adjacent to the site. The drift thickness is generally of the order of 5m.

The carboniferous sedimentary rocks of the Passage Group underlie the site. These are mainly sandstones and fireclays with thin mudstones, limestones and coal seams.

Mineshafts, quarries, and an area of opencast fireclay workings are known to have existed outside the site. One small area of quarrying is indicated to be an area of Disturbed Ground with rockhead at shallow depth.

The Coal Authority Report indicates that underground workings in six coal seams took place at depths in excess of 270m below the site on or before 1972, and that any ground movement associated with these should have stopped by now. They also indicate that a fireclay seam was worked at a depth of 90m on or before 1969. The Authority has no record of mine entries within the site. There remains the possibility that unrecorded mine entries or mineworkings may exist within the area of interest.

The site may therefore generally be summarised as one where Glacial Till is underlain by sedimentary rocks of the Passage group, with recorded workings at depths and of such vintage that they do not affect the site.

A comprehensive investigation including cable percussion (soils) boreholes, trial pits, gas and groundwater wells, in situ testing, and geotechnical and chemical contamination testing will be undertaken in order to facilitate future development. Rotary (rock) boreholes may be required to investigate the potential for unrecorded mineworkings.

7.1.3 KEY UTILITY SERVICES

FOUL WATER

The existing Whitburn settlement is served by a Waste Water Treatment Works to the north of the M8. There is a network of existing foul and surface water drainage pipes to the north of the proposed site that will be the connection for future drainage services. A full DIA will be carried out in conjunction with Scottish Water.

SURFACE WATER

There are a number of potential locations surrounding the proposed development site where surface water drainage could be connected. An appropriate SUDs scheme will be developed to ensure the appropriate treatment and attenuation of future surface water flows.

POWER

There are a number of high voltage power supplies in close proximity to the proposed development site. These supplies are served by a series of sub stations. Any future demand for power will be sourced from the existing network with the appropriate reinforcement as required.

GAS

A network of existing gas services is local to the proposed development site. There are intermediate and medium pressure supplies. The existing surrounding development has necessitated a good provision of gas service infrastructure in the area.

Any future demand for gas will be sourced from the existing network with the appropriate reinforcement as required.

POTABLE WATER

A review of the available potable water supply has identified an existing network of relatively new potable water infrastructure in the built development abutting the development site to the north. A full DIA will be carried out in conjunction with Scottish Water in order to identify the need for any local network upgrades.

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