

**West Lothian Council – Local Development Plan**

**Main Issues Report on behalf of the Rosebery Estates Partnership**

**Main Issue 1: Economic Development and Growth**

**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?**

We support the “preferred” approach to employment land, identified in the Main Issues Report, to review the range of uses which could be accommodated on employment land, with a view to accommodating a more flexible approach involving a wider range of uses on sites identified in the LDP.

Picking up on the identified oversupply of land and lack of clarity over the location and “fitness for purpose” of much of the existing employment land supply, we have engaged the services of Ryden Property Consultants to undertake the attached “Employment Land and Property Market Review” which has informed our representations.

It can be seen from the attached study that the site (Ref: EOI-0012 & EOI-0013) is currently not identified as part of the effective employment land supply; is in a secondary location with major constraints preventing it becoming effective for its currently allocated use and in the absence of a new approach, is expected to remain undeveloped as an employment site into the longer term.

The market review suggests that the sites best prospects within the employment use classes would be for an estate targeting medium sized industrial/logistics users of around 4-6ha (approx. 20-25% of the total site). However, this development on its own is not seen as being likely to be viable due to the infrastructure and servicing costs associated with the site.

We therefore believe that Almond North (Ref: EOI-0012 & EOI-0013) is an area which would warrant a more flexible approach would therefore seek an amendment to the currently proposed designation of these areas to allow for a mixed use development comprising residential and a medium sized estate (4-6ha) targeting medium sized industrial and logistics users be permitted on these sites in the Proposed Plan.

**SEE ATTACHED EMPLOYMENT LAND AND PROPERTY MARKET REVIEW**

**Question 6) Do you agree with the ‘Alternative’ approach to employment land?**

We would not support the “alternative” approach.

**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?**

We believe that the Council has an over-supply of employment land, particularly for certain sectors as confirmed in the Ryden Report referred to in our response to Question 5 and that in particular, Almond North (Ref: EOI-0012 & EOI-0013) is too large and in the wrong location for the uses currently envisaged in the Plan. A flexible approach to this site as suggested in our response to Question 5 would be justified here.

### Main Issue 3: Housing Growth, Delivery and Sustainable Housing Locations

#### Question 15) Do you agree with the 'Preferred' strategy for housing growth in West Lothian? If not, why not?

We support the preferred option adopting Scenario 3 (high growth) and planning for 3,500 houses above the base requirement. However, we see this as being simply the "generosity allowance" (which seems to be at the upper end of the scale required by SPP) which does not appear to have been added elsewhere to the Councils numbers. We are also concerned by the calculation used in the Background Housing Paper and do not believe that the calculation is correct.

We note that the Housing Land background paper considers the SESplan Housing Land Supplementary Guidance as being an inadequate basis on which to prepare this consultation. There is only one Member Authority awaiting ratification of the SG Housing Land (East Lothian Council on 28<sup>th</sup> October) and this document has been relied upon by the DPEA Reporters Unit in recent appeal decisions and would therefore consider it to be completely adequate for this purpose.

We had responded to the SESplan SG Consultation seeking clarification that the numbers identified in Table 3.2 (headed "Additional Allowances...") were in fact in addition to the numbers in Table 3.1. We did not receive a clear response to this, and have since been told that Table 3.2 is simply an indication of where the Table 3.1 numbers might be delivered. This is clearly an area where clarification is required and we have written to SESplan Authority seeking this clarification and would suggest the Council do likewise.

As we understand it, and using the information from the Councils Housing Background Paper, we believe that a table which looks like the following should be prepared, particularly if the Council are looking to exceed the 10 year requirement in this Plan. We have not undertaken detailed analysis of the figures used, but simply lifted them from the Councils Background Paper.

<b>Setting the LDP Housing Land Supply Target</b>	<b>2009-2019</b>	<b>2019-2024</b>
West Lothian Council Housing Land Requirement	11,420	6,590
+ 20% to ensure a generous supply and achieve +3,500	2,284	1,318
<b>LDP Housing Land Supply Target</b>	<b>13,704</b>	<b>7,908</b>
<b>Meeting the LDP Housing Land Supply Target</b>		
Effective Supply	3,418	3,227
Constrained Sites Coming Forward	2,701	3,580
Housing Completions 2009-2013	1,302	-
Windfall	480	400
Demolitions	- 568	- 100
<b>Total Supply from Existing Sources</b>	<b>7,333</b>	<b>7,107</b>
<b>Target to be met through new LDP allocations</b>	<b>6,371</b>	<b>801</b>

This approach would appear to indicate a larger shortfall to be met in this plan than currently anticipated by the Council, which we felt might be helpful to highlight at this stage to avoid this becoming an Examination Issue.

If we are correct, and the shortfall is of the scale identified above, then additional housing sites will be required, and it is not considered to be appropriate to simply add more sites to the existing large scale development areas. We have suggested an approach which might help deliver some additional housing numbers in a marketable area at Livingston, and at Bridgend.

**Question 16) Do you agree with ‘Alternative Strategy 1’ for housing growth in West Lothian? If so, why?**

No we do not agree with the “Alternative Strategy 1” for housing growth in West Lothian.

**Question 17) Do you agree with ‘Alternative Strategy 2’ for housing growth in West Lothian? If so, why?**

No we do not agree with the “Alternative Strategy 2” for housing growth in West Lothian.

**Question 20) Do you agree with the ‘Preferred’ option for the removal of existing housing allocations from the development plan? If not, why not?**

We support in some cases the removal of allocations from sites which clearly will not come forward for development, but we support the continued identification of Bridgend site ref HBd2/EOI-0011 at Willowdean (South) as a 1.12ha site for a development of up to 40 houses. We are in the late stages of concluding a sale to a housebuilder who is standing by with an application ready to submit.

However, we are unable to support the identification of EOI-0010 at Land adjacent to Bridgend Golf Course as a preferred new site for a development of 25 houses. This site represents an illogical extension of the settlement in to the countryside and there are restrictions preventing development in place meaning that it is unlikely to come forward for development even if allocated. We therefore must object to this preferred allocation.

We are similarly unable to support the identification of EOI-0065 at Bridgend Farm as a preferred new site for a development of 30 houses. This site was considered at the last Local Plan Examination (as North East Bridgend) and the Councils case indicated that this site formed an *“important and valuable contribution to the landscape setting of Bridgend, which would be substantially eroded as a consequence of being developed”*, there were also concerns about site servicing and access amongst other things. The Reporter in considering the site concluded that the allocation *“could be considered as a strategic extension of Bridgend, which we find would have a significant adverse impact on the character of the village”*. We therefore must object to this preferred allocation.

We have no objection to, and support, the identification of COU3 at Auldhill as a preferred new site for a development of 5 houses.

In light of the issues identified above with the majority of the preferred new sites, and the loss of some 55 houses from the land supply and the settlement, we would propose the allocation of the attached site at Bridgend in their place, to deliver the housing numbers (and potentially slightly more) in what we consider to be a more appropriate location better related to the school, shops and bus stops than many of the current sites under consideration. Had we anticipated Bridgend being subject to such significant growth we would have put this site forward in response to the Call for Sites.

The site is not in an area identified as being at high risk of abandoned underground mines, but further investigation on this will be undertaken to establish this. There are no listed buildings, scheduled ancient monuments or other features of archaeological significance on the site or in the vicinity. The site is not identified by SEPA as being subject to flooding from rivers, the sea, or surface water. The site is not identified by SNH as being within or in close proximity to any features of environmental or ecological significance or protection.

The site is within the ownership of a person actively involved in discussions with a housebuilder regarding the development of the currently allocated site, and steps are being taken to make this land available at which stage it is hoped that it would be of interest to the housebuilder to enable them to continue the currently allocated site on to this land providing a through link from Willowdean to Auldhill Road.

The major benefit of this would be a logical rounding off of the settlement on some marginal agricultural land, and securing development in close proximity to the school, bus stops and village shop. Whilst the site is larger than those being replaced (approx. 6.4ha), we are not proposing development on the whole site. We have identified an approximate developable area of some 3.8ha, capable of accommodating approximately 90 houses, with the balance being landscaping, park and open space to enhance the landscape setting of the development and minimise any adverse impact.

### **SEE ATTACHED BRIDGEND PLAN**

#### **Question 22) Do you have any other alternative options? What are they and how would you make them work?**

As set out in responses to Questions 5, 8 and 15, we believe that there is a larger shortfall than anticipated, and that a more flexible approach is justified to the Almond North CDA (Ref: EOI-0013) and the preferred new site for employment provision (Ref: EOI-0012).

We note, in the “Infrastructure Considerations” part of the Livingston Settlement Statement, that there are significant levels of employment land available but that these *“require to be reviewed to ensure they are in the right location and remain fit for purpose”*. Picking up on this, and as highlighted in our response to Question 5, we have commissioned Ryden to undertake a “Employment Land and Property Market Review” of the land supply in West Lothian generally, and Livingston specifically.

We note that whilst, on the proposals map, EOI-0012 is identified as “Preferred New Site” for employment, however it is not identified in the Settlement Statement as such. We would request that this preferred site be reflected on the Settlement Statement as such, but that consideration be given to the change outlined in our response to Question 5.

It would appear as though the Council may have a shortfall of housing land that needs to be met, and that the employment development considered for this site is, on its own, unlikely to come forward in the short to medium term. We would therefore request that consideration be given to amending the proposed allocation of these sites as outlined in our response to Question 5 for a mixed use development comprising residential and a medium sized estate (4-6ha) targeting medium sized industrial and logistics. The precise mix will require further investigation.

We have also requested that consideration be given to extending the Almond North CDA (Ref: EOI-0013) down to the river (as per the adjacent Council owned site Ref: EOI-0173) to allow for landscaping, open space and SUDs to be located in this area and for a comprehensive masterplan to be Prepared.

### **SEE ATTACHED LIVINGSTON PLAN & EMPLOYMENT LAND AND PROPERTY MARKET REVIEW**

## **Main Issue 6: The Natural and Historic Environment**

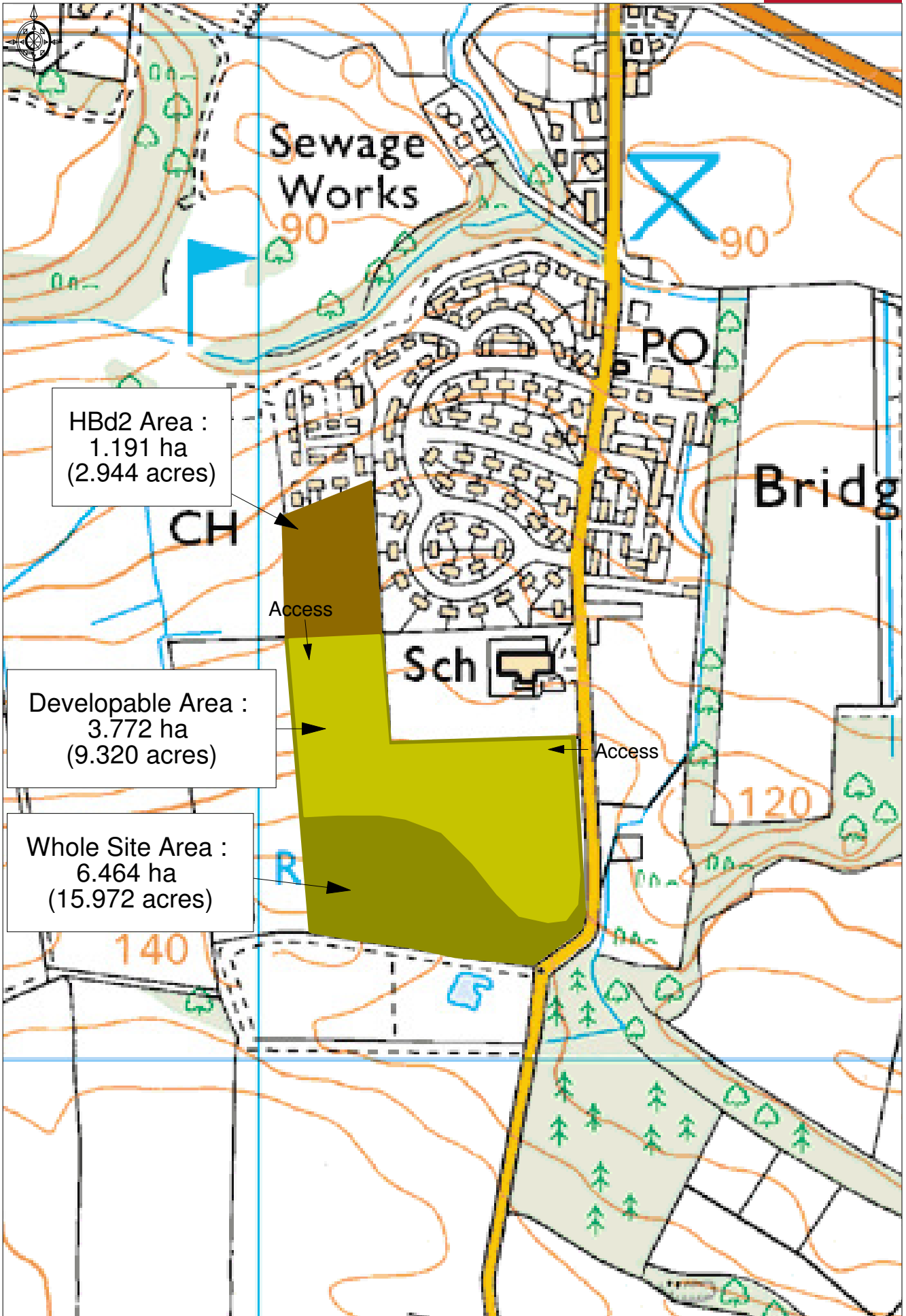
**Question 54) Is the 'Preferred' approach to housing development in the countryside appropriate? If not, why not?**

We support the "Preferred Approach" to housing development in the countryside.

We nevertheless believe that some general updating and relaxation of this in some cases might be appropriate to maintain the windfall assumptions.

**Question 55) Do you agree with any of the 'Alternative' approaches to housing development in the countryside?**

We would also support the "Alternative Approach 1" allowing more redevelopment of rural brownfield land for housing which we believe would allow for the windfall numbers to be maintained. As the Lowland Crofting Policy has been in place and delivered 12 sites since the early 1990's it has to be assumed that the most attractive areas have been developed and a question mark over how many more might be delivered. This has to be offset somewhere



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