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14 October 2014

Dear Sir,

WEST Lothian Local Development Plan: Land at Wilcoxholm Farm, Edinburgh Road, Linlithgow (EOI 0114)

On behalf of Davidson and Robertson Rural, RFA wishes to make a representation to the West Lothian Local Development Plan (LDP) in respect of land in the ownership of Mr John Kerr at Wilcoxholm Farm, Edinburgh Road, Linlithgow, EH49 6QT.

The subject site is identified within the MIR as a preferred site (part). It has been subject to previous representations to the LDP as part of a plan led approach. A formal letter of support has been submitted to Proposed LDP identifying planning reasons for inclusion of the land as a good and effective residential development opportunity.

The landowner endorses and agrees with the approach being taken by WLC in respect of the LDP. However my client wishes to see the designation of preferred (in part) converted to a housing allocation within the Proposed LDP. We believe that the site is the most sustainable option for the expansion of Linlithgow and is best placed to accommodate strategic housing land. It is considered that this site is a most sustainable location within this area and has the potential to meet key planning objectives within both SESPlan and the LDP.

The Land has been brought forward at this stage in response to mounting development pressures in Linlithgow and a perceived shortage of housing throughout the SDA. As such the MIR is exploring

whether a policy of restraint should be maintained or whether a more flexible liberal approach can be taken. We have reviewed the MIR the Housing Background Paper, Site Schedules and Environmental Report in this regard, and strongly recommend that the Council allocate Wilcoxholm for reasons given below.

Site Description and Characteristics

The site comprises of approximately 20 ha of arable and agricultural land located to the south east of Linlithgow. It lies to the north of Edinburgh Road (B9080). There is capacity and development potential for 400-450 houses and the site has been subject to a feasibility study.

The land is elongated in nature and forms a finger of countryside immediately adjacent to the built up area of the town. It is dissected by the Union Canal. There is housing along the southern and western boundary of the site. Further housing lies to the north of the site beyond the rail line, which connects the area to Edinburgh and Glasgow.

The site is well located for transport and is in close proximity to Linlithgow Railway Station. It has no specific constraints that would preclude development and can be serviced.

Development Plan

The subject land is located outwith the Settlement Boundary of Linlithgow as identified within the *West Lothian Local Plan 2009* and is identified as Countryside Belt. Policy ENV32 and Countryside Policy ENV2-7 ENV 9 and ENV 19-20 apply. However, the Local Plan is significantly out of date and does not comply with SESplan or Scottish Planning Policy.

The development proposal for housing is a logical, natural extension of Linlithgow to the south – east. It is a proposal that will minimise environmental and visual impact on the historic burgh and make best use of the Union Canal corridor

The Proposed Local Development Plan must be prepared in accordance with the approved SESplan (as modified by Supplementary Planning Guidance on Housing and the requirements of new Scottish Planning Policy (June 2014). Guidance within SPP and PAN 2/2010 advises a range of house types and sizes must be provided in both market and affordable tenures. Planning Authorities need to be ambitious in their targets in order to satisfy local requirements working in collaboration with landowners and developers to meet housing requirements for established and effective land in marketable locations such as Linlithgow.

It is a key SPP requirement that a 5 year supply of housing is maintained to facilitate growth through the planning process. SESPlan provides the parameters for the spatial strategy and scale of housing and employment growth required to secure economic recovery in the West Lothian Corridor. Housing provision is based on a Housing Need and Demand Assessment (HDNA), and Supplementary Planning Guidance (SPG) approved by Scottish Ministers in June 2014.

SESPlan also recognises the importance of the West Lothian Corridor as an important area for employment and economic growth. As of 31 March 2013 the effective land supply in West Lothian was 14,470 units out of an established Land Supply of 22,533. The SPG identifies an overall requirement of 11,420 houses for the period 2009-19 and 6,590 houses for the period 2019-24. Based on the information within the 2013 Housing Land Audit it is estimated that there is a shortfall in the 5 year land supply of approximately 45% or 4,371 units.

The preferred strategy appears to focus on increasing numbers within the Core Development Areas and much of this earmarked for phased development beyond 2019 and indeed beyond 2024. This approach is considered to be flawed in so far that it is over reliant on large allocations, constrained sites and windfalls which will not deliver effective sites and could constrain the level of house building.

Scottish Government advises that 'the planning system should contribute to raising the rate of new house building by identifying land for the provision of a range of housing in the right places' Paragraph 110 of SPP states that 'The planning system should: identify a generous supply of land for each housing market area within the plan area to support the achievement of the housing land requirement across all tenures, maintaining at least a 5-year supply of effective housing land at all times'. This clearly is not the case and there is a possibility that the LDP will result in under supply without additional allocations.

Notwithstanding the housing figures, there is a need to take a more realistic and pragmatic view in formulating a more ambitious vision for West Lothian that is more in line with SPP and SESplan. Greater emphasis is required in identifying alternatives to CDA provision which can support the delivery of new market and affordable housing in parallel with economic growth Housing supply in Linlithgow should therefore be given the status commensurate with a key strategic location which is accessible and marketable.

In relation to sites that have not been developed or are constrained, there is a need to consider how the feasibility and viability of such allocations can be improved through the planning system in

order to attract development. Wilcoxholm is a prime marketable site situated in a sustainable location and meets the tests for housing allocations being unconstrained.

The land at Linlithgow is effective, capable of being delivered in the short to medium term and will help to meet housing need in West Lothian. The landowner therefore believes that it should be allocated for housing development in the emerging Proposed Local Development Plan.

An allocation at Wilcoxholm Farm for housing development will accord with the housing and economic development priorities of West Lothian Council. It will increase the provision of new market and affordable housing and will create a range of choice of housing type and tenure.

Development will be subject to a masterplan in accordance with SPP policy principles; PAN 44; PAN 67; PAN 83 and in line with best practice set out in Designing Places, Designing Streets. Adherence to these principles will allow a successful integration with the urban area. Proposals will be of an exceptionally high design standard and will comply with best practice design guidance. It will integrate sympathetically into the surrounding landscape and will be of a design and density that is sympathetic to the urban fringe location.

Development Potential

The MIR recognises that land at Wilcoxholm Farm can assist the Council in meeting the strategic housing land requirements within the Housing Market Area (HMA), and provide an enhanced range and mix of housing including affordable housing for Linlithgow.

The objective in proposing this allocation is to promote a sustainable and high quality development which responds to strategic housing requirements. The site is well located and can be fully integrated into the urban structure. It is free from constraints and is capable of being effectively developed. Wilcoxholm provides an outstanding development opportunity that should be promoted through the emerging West Lothian LDP.

In particular land allocation of Wilcoxholm would:

- Assist in addressing the supply of land within an established growth corridor in order to meet established demand within the housing market area;
- Address issues regarding land supply, choice and range of housing tenures and type and affordable provision to be addressed;
- Allow a high growth market recovery strategy to be pursued in conjunction with other key allocations and infrastructure decisions;

- Address development pressures within the SESplan region by allocating an effective, sustainable housing use;
- Use available infrastructure and allow development close proximity to the transport network, jobs services and commercial facilities;

Development potential at Wilcoxholm Farm has also been recognised in terms of development planning objectives and key feasibility and viability criteria. It can be accessed and serviced and any environmental impacts are able to be adequately mitigated and managed. Also Development would allow consolidation of the settlement boundary and an improved gateway and landscape setting for the town. Therefore, there is potential for the development of this site to be viewed as a 'rounding off' of Linlithgow's settlement boundary adjacent to Wilcoxholm Farm Road.

The site would predominantly be used for residential purposes and a mix of housing, approximately 200 units and open space. Existing business uses could be retained and operate in conjunction with adjoining housing development. There may also be potential for leisure use in association with the Canal and small scale commercial development serving adjoining housing if necessary.

In particular:

- There are strong transport linkages for all modes of transport currently benefiting the site, with proximity to the A9 and A89. The site is in close proximity to the town centre and Linlithgow Railway Station.
- Landscape and visual impacts can be contained and would be mitigated maintaining the character of the area as a blue link along the Union Canal
- Environmental considerations adjacent to the Canal can be managed and increase access and recreational potential
- A high quality urban design solution is possible at Wilcoxholm in accordance with SPP Successful Places and Designing Streets.

Response to the MIR

The land at Wilcoxholm Linlithgow can assist the Council in meeting the strategic housing land requirements within the Housing Market Area (HMA), and provide an enhanced range and mix of housing including affordable housing for the West Lothian SDA in accordance with SESplan and Scottish Planning Policy objectives.

In summary the MIR sets out a key policy challenge in terms of growth or restraint for the town. It bases this analysis on the following comments:

- Priority is given to brownfield plan being developed in the Strategic Development Plan and this is a greenfield site.
- However, not all housing requirements can be accommodated on brownfield sites and therefore some greenfield housing release will be necessary and this site is to be supported as an allocation, in part.
- Development of the site, whilst not strictly speaking in full accordance with the council's preferred development strategy which supports development within the core development areas and other strategic locations, nevertheless will represent a potential longer term logical expansion to the town.
- There are education capacity constraints within the area which prevent development of this site in the short to medium term.
- Appropriate flood risk mitigation and off site drainage to Linlithgow Loch would be required if the site were to be developed.

It is acknowledged that in accordance with SPP and SESplan not all housing requirements can be found on brown-field land. It is a clear and logical extension to Linlithgow that will allow housing and ancillary development to take place as part of a high quality development.

The Councils preferred strategy for West Lothian is largely dependent on the performance of Core Development Areas and key strategic locations which includes Livingston. It is clear that the performance these and in other strategic locations has been variable and not in accordance with strategic targets.

In this regard we consider the potential allocation to be fully in accordance with SPP, SESplan (Policies 1A/ 1B and Policy 7). West Lothian clearly needs to build these considerations into their development strategy.

If the LDP is to be consistent with SSP and SESplan this clearly implies a growth scenario rather than a continuation of constraint. Material considerations in this regard include cognisance of Linlithgow in terms of:

- Designation of West Lothian as an SDA
- Existing housing requirement and backlog (HNDA based figures)
- Population and household growth projections

- The level of housing need identified within the LHS
- Continued in migration to the town
- Housing market development pressures and prices
- Potential for education and transport infrastructure contributions
- Environmental betterment

Some of the existing allocations within West Lothian are not performing in accordance with PAN 2/2010 and are precluding more effective and marketable sites such as this one from being progressed. There is an over reliance on these areas at the expense of equally sustainable and more marketable locations such as Linlithgow which should be a major focus for housing and economic development.

Education capacity constraints are cited as a reason for exclusion in the short – medium term but not over the plan period. However it is not clear that there is an educational constraint and the landowner would wish to challenge this assertion in the absence of detailed figures. We will continue to monitor the school roll figures in relation to school catchment areas.

At this stage we are unaware of any infrastructure constraints that would technically inhibit the development being proposed. Preliminary pre development drainage information has been assessed and will be subject to a full Drainage Impact Assessment. The site will be subject to a full Flood Risk Assessment. We are confident that mitigation measures would assist in facilitating development.

The West Lothian Local Plan was produced in response to the ELSP and focussed on making West Lothian a prosperous place to live and work whilst minimising environmental impacts economic growth. Linlithgow was identified within the Structure Plan as an area of restraint and Wilcoxholm is identified on the Proposals Map as an unallocated site outwith the settlement boundary.

There is a presumption against development in the Local Plan and an acknowledgement that Linlithgow is an area of restraint which is now being questioned in relation to strategic housing land requirements and the flexibility of educational catchments. Indeed the SDP SESplan now identifies the whole of West Lothian as a SDA where growth housing and economic development is to be encouraged.

Despite this there is still caution about allowing growth outwith existing proposals in Linlithgow due to concerns regarding cumulative development pressures on infrastructure and education. These

matters are unsubstantiated in terms of this allocation which can comply on matters of transportation accessibility and education provision.

The physical expansion of Linlithgow has not been fully tested but there is no evidence that an alteration to the urban boundary envelope would constitute an intrusive physical expansion. Landscape, topographical and visual assessment of the prevailing site conditions indicate that there is the environmental capacity to accommodate development.

Furthermore the proposed allocation will bring associated socio-economic and community benefits that this development could deliver including affordable housing.

Effectiveness and Delivery

In terms of PAN 2/2010 we are not aware of any ownership, physical, financial or marketing constraints that would preclude this site from coming forward in the short-medium term and form part of the 5 year land supply. Infrastructure and services are available to support the development of this land during the plan period.

Developer contributions will be negotiated with the Council for Education, Transport, Affordable Housing and Community Contributions in accordance with Supplementary Guidance and through Section 75 Agreements and Planning Obligations.

In accordance with the Town and Country Planning Scotland Act any application coming forward for the site will need to be determined in accordance with the development plan unless material considerations indicated otherwise. Nonetheless we consider there to be very strong material arguments which would give significant weight to any application coming forward in the future.

In particular SPP seeks to increase the supply of housing and maintain a 5 year supply of effective housing land at all times as part of a generous supply for house builders. However it also acknowledges that some development will need to take place on green field land adjacent to existing settlements.

Conclusions

The site at Wilcoxholm Farm has been partially allocated for residential development and given the issue above we see no reason that the full site would not be allocated within the Local Development Plan. It is ideally suited for the provision of family housing for Linlithgow incorporating urban fringe land within a residential area as part of a logical extension to the town.

Linlithgow has a major role to play in the West Lothian housing market and hence the future economic prosperity of the town. The issue of growth would appear to be an absolute necessity for a range of demographic, development, infrastructure and delivery reasons. Wilcoxholm provides the best opportunity in environmental capacity terms to accommodate this growth within Linlithgow.

In addition to providing a feasible and effective proposal, it can be justified in housing supply terms in order to meet the strategic land requirement in West Lothian. It can be accessed and has no overarching constraints that would preclude development. There are significant socio-economic and environmental benefits in allocating this land not least in the supply of affordable housing.

The site does not make significant contribution to the Countryside Belt objectives. In terms of urban design the site provides a good opportunity for quality place-making integrated into the existing community infrastructure.

It is the landowners intention to take this site forward with a development partner and formally submit a planning application for the land. A Masterplan will be brought to the Council in due course for discussion in relation to the planning issues raised in this paper.

It is therefore respectfully requested that WLC fully considers the potential of this land against the SESplan requirements and makes an allocation for housing within the emerging LDP.

Yours,

Rick Finc, MRTPI, MIED, Principal

RFA | Edinburgh | 14 October 2014