

WLC REF: MIRQ0183

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**RESPONSE TO CONSULTATION ON
WEST LOTHIAN LDP MAIN ISSUES REPORT – AUGUST 2014**

17 October 2014

Please find below the Homes for Scotland representations on the West Lothian LDP Main Issues Report. Questions most relevant to Homes for Scotland's role and members have been extracted from the Main Issues Report Questionnaire. The sections of the Main Issues Report on which Homes for Scotland has made representations are:

- The Vision, Aims and Spatial Strategy for West Lothian
- Main Issue 3 (housing)
- Main Issue 4 (infrastructure)

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Vision, Aims and Spatial Strategy for West Lothian

Question 1

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

No (or only in part)

Homes for Scotland supports the reference to providing a greater range of housing, but the Vision Statement should be strengthened by emphasising the Council's commitment to increasing the supply of housing and meeting the area's needs.

Question 2

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

Yes

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

Question 3

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

Not fully

Homes for Scotland can support the first two aims relating to Main Issue 3:

- Provide a generous supply of housing land and provide for an effective five year housing land supply at all times
- Continue to promote development within core development areas

Homes for Scotland does not support the third aim, that being:

- Support the council's new build housing programme and the council's approach to the provision of affordable.

This aim emphasises a means of delivering affordable housing, rather than the outcome of increasing the supply of affordable housing. This aim should be reframed using wording which does not imply the exclusion of other providers from the affordable housing supply chain.

Homes for Scotland supports the aim relating to Main Issue 4:

- Ensure that infrastructure and facilities are provided to support population and economic growth and where appropriate, secure developer contributions towards such provision.

Question 4

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

Yes

Amend Main Issue 3 Aims as follows:

- Provide a generous supply of housing land and provide for an effective five year housing land supply at all times
- Continue to promote development within core development areas (CDAs)
- **Increase the supply of affordable housing from all available sources, including through the Council's** new build housing programme. ~~and the council's approach to the provision of affordable housing.~~

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?

No

Homes for Scotland supports the spirit in which the preferred strategy has been crafted. However, because **the strategy is based on housing supply calculations which have not been tested or agreed with the home building industry, we cannot endorse the strategy in full, as currently written. In particular we cannot at this stage endorse the figure of 3,500 as the number of new homes for which new site allocations are needed.**

It is essential that the calculations used to inform the forthcoming proposed plan are tested with the industry before being finalised. The Housing Land Audit 2014, which is currently the subject of consultation with Homes for Scotland, will provide a beneficial starting point for the Council's calculations. But it is imperative the Council does not at this stage tie itself to un-agreed draft figures which could result in a significant undersupply of housing.

The proposed plan must present distinct housing supply targets for the period to 2019 from 2019 to 2024 – reflecting the two distinct housing requirement figures set out in SESplan. If the proposed plan is based only on an averaged target for the entire period to 2024 it will not be consistent with the Strategic Development Plan or with Scottish Planning Policy, and will create an acute housing land shortage for the first of the two periods.

Homes for Scotland does though support the following detailed aspects of the preferred strategy. These should all be carried forward into the draft plan:

- The intention to provide for more housing than the minimum required by the Supplementary Guidance to the SPD
- Recognition of the benefits of allocating a range of smaller housing sites in various locations across West Lothian

- Recognition of the need to maintain investor confidence and make sure that developments in existing large housing growth areas remain viable going forward (and of the benefits of making additional allocations in these areas).
- The underpinning aspiration for growth aimed at delivering sustainable economic prosperity and quality of life for communities in West Lothian...and [providing] a broader range of houses.

Question 16

Do you agree with 'Alternative Strategy 1' for housing growth in West Lothian?
If so, why?

No

The Council should pursue its preferred strategy for housing growth, but should revisit its calculation of housing supply, in consultation with the home building industry.

Question 17

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

No

The Council should pursue its preferred strategy for housing growth, but should revisit its calculation of housing supply, in consultation with the home building industry.

Question 18

Do you have another alternative strategy? What is it and how would you make it work?

No

The Council should pursue its preferred strategy for housing growth, but should revisit its calculation of housing supply, in consultation with the home building industry.

Question 19

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

Maintain open and honest dialogue with the home building industry to ensure programming assumptions are up to date and realistic. Ensure the proposed plan has sufficient policy flexibility to enable the Council to respond quickly to unexpected issues both positive (e.g. unexpected windfall sites coming forward which can deliver homes when they are needed) or negative (e.g. delays to or cancellation of essential infrastructure projects).

Take a coordinating, project-management approach to ensuring all relevant agencies are actively involved in planning infrastructure investment.

Question 20

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

Yes, in principle

It is appropriate for sites which are constrained to be excluded from any calculation of the effective supply of housing land, and to be deallocated if there is no realistic prospect of them contributing to housing supply during the lifetime of the plan. The criteria used for selecting sites to be de-allocated should be more clearly explained, to enable interested landowners or developers to provide their comments.

Question 21

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

No

The alternative option does not appear to be based on any active approach to spatial planning or to a clear evidence base.

Question 22

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

No**Question 23**

Do you agree with the 'preferred' approach to the core development areas? If not, why not?

The wording of the preferred approach is acceptable within itself, but the supporting narrative does provide a clear description as to how the Council will work with the development industry and others to enable sites in the CDAs to deliver. The Council rightly acknowledges that there is a significant infrastructure burden on large developments in the large scale housing growth areas, and the consequential risk that these large developments may not progress beyond a certain stage. Winchburgh is highlighted as an example of an area where development is restricted pending the provision of a new non-denominational secondary school, as well as a new motorway junction. Disappointingly, at the end of paragraph 3.74, the Council simply states that the onus will be on the development industry to develop a solution to address and remove these infrastructure constraints.

Question 24

Do you agree with the 'alternative' approach to the core development areas? If not, why not?

No.

The alternative approach is very defeatist.

Question 25

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

N/a

Question 29

- (a) Should the definition of Linlithgow as an 'area of restraint' be removed and, if so, how should the town be developed in the future?
- (b) Should a sequential approach be applied to the release of land in and around Linlithgow to accommodate any new development?

(a) Yes

The council should be careful to ensure its cumulative expectations on developer funded infrastructure do not render development in Linlithgow unviable before new sites have even been allocated. The narrative refers to the need for a new secondary school at Winchburgh, new primary school places, west facing slip roads onto the M9 at Junction3, higher rates of affordable housing contributions and community facilities including enhanced health facilities. Additional education provision in Linlithgow will need to be actively programmed by the Council if the removal of the 'area of restraint' policy is to be successful.

(b) Yes, but be flexible

Considering the re-use or re-development of brownfield land before new development takes place on greenfield sites is a reasonable starting point, and is in line with SPP advice. It is important though that this is undertaken at the development planning stage and not left to consideration of individual greenfield sites. Allocation of a generous supply of land across a number of sites is the approach most likely to result in timely delivery. Greenfield allocations should not be unduly withheld from release if brownfield sites cannot, at the time of allocation, be demonstrated to be effective. The council should liaise closely with developers and landowners on this. The proposed plan should provide a clear guide on the level of contribution developers can expect to be asked for. This is vital information that will affect the heart of the spatial strategy. It should not be left to supplementary guidance, as seems to be the implication of paragraph 3.97.

Question 35

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

In part

Homes for Scotland does not support the current policy (which is unjustifiably biased towards council house building to the exclusion of other willing and able providers), and strongly supports the proposed policy review. Affordable housing provision is, though, too fundamental an issue to be wholly set aside for supplementary guidance. It is vital that the proposed plan includes clear policies on affordable housing. The narrative text in this section of the Main Issues Report makes various references to SPP, but does not mention or fully address the requirements of SPP paragraphs 115, 120, 128, 129 or 130 (which relate to addressing the supply of land for affordable housing, scale and distribution of affordable housing, role that planning

will taking in addressing needs, developer contribution expectations, nature of affordable housing needed and meeting needs over the plan period.

As advised by SPP paragraph 131, detailed policies can be set out in supplementary guidance. But the plan itself cannot be silent on the approach that will be taken to the provision of affordable housing and to developer contributions.

Question 36

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

No

The council's current approach to affordable housing does not strike the right balance between sound planning and political ambition. The Council's commitment to delivering affordable housing is to be commended, as is the leadership it shows in directly delivering some of that housing through its programme of council house building. However, there is no merit or glory to be found in excluding supply from other willing and able providers, including commercial home builders. The council must turn its focus to providing the maximum possible number of affordable homes, from the most efficient and appropriate sources. Decisions should always be based on how a particular development can best contribute to increasing the stock of affordable homes in West Lothian, not how many houses it can add to the Council's tally of new council houses built. The two are not the same.

Question 37

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

Whatever the overall approach, the council should seek the most appropriate (in planning terms) means of securing affordable housing in each case. This will mean allowing home builders working with RSLs to deliver affordable units, in many cases.

Main Issue 4: Infrastructure Requirements and Delivery

Education, Community, Healthcare, Sports

Question 38

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

No, in so far as it will result in a proposed or adopted plan which does not provide enough certainty on how development on allocated and windfall sites across the plan area are expected to create planning impacts which will need to be addressed through developer contributions. Homes for Scotland could not support a proposed approach which fully consigned the approach to developer contributions to supplementary guidance. The proposed plan must clearly indicate how education provision will be made in a timely way which supports and does not hinder development.

Question 39

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

No.

As the alternative approach very candidly states, it is unrealistic and contrary to national planning policy. It is not, therefore, a valid or credible alternative.

Question 40

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

The council could consider front-funding education to unlock development, and back-filling the expenditure through reasonable developer contributions.

Reference is made in paragraph 3.122 to reviewing and reducing contributions to help stimulate recovery in the house building sector. This flexibility is essential and should be retained as the proposed plan and supplementary guidance is drafted, as well as when considering individual schemes.

Question 41

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

The scale of social infrastructure of all types that the Main Issues Report suggests is needed to support the required level of housing development merits a systematic and partnership approach being taken to master-planning and project-managing the future development of the area. This could follow the type of model used by urban development corporations and in relation to other major regeneration projects. Greater certainty is needed by all parties: developers need to know what is to be expected of them and how the delivery of infrastructure to which they make contributions will affect their programming. The education and health authorities, for example, need to know when they need to be planning for the extension or creation of facilities. Where facilities are to be combined, for example where healthcare facilities are to form part of a new community centre, the healthcare provider will need to be geared up well in advance of all key stages, including specifying the detailed requirements for a facility and preparing to occupy and run services from it. Processing agreements should be used, and consideration should be given to coordinating these across a range of development sites in order to provide a synchronized and clear framework for project management across the public and private sectors. Public service bodies should be prepared to play a fully engaged role to better support developments which will be providing them with new, extended and improved facilities. Leaving negotiations until the application stage is too late.

Travel, Access

Question 42

Do you agree with the 'preferred approach to promoting access to/from/within West Lothian? If not, why not?

Yes

Question 43

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

Yes

Question 44

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

No