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**West Lothian Main Issues Report  
Assessment of the Housing Land Supply**

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On behalf of

**WALLACE LAND**   
INVESTMENT + MANAGEMENT

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## Contents

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<b>1.0</b>	<b>Introduction</b>	<b>1</b>
<b>2.0</b>	<b>Scottish Planning Policy</b>	<b>2</b>
<b>3.0</b>	<b>SESplan SDP</b>	<b>4</b>
<b>4.0</b>	<b>West Lothian Main Issues Report</b>	<b>6</b>
<b>5.0</b>	<b>Recommendations for Proposed Plan</b>	<b>11</b>
<b>Annex</b>	<b>Assessment of the Housing Land Supply</b>	<b>1</b>

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## 1.0 Introduction

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- 1.1. There are significant issues regarding the methodology adopted by West Lothian Council to define the housing land requirement and the effective housing land supply for the Main Issues Report. These issues need to be addressed by the Council before preparation begins on the Proposed Local Development Plan (LDP).
- 1.2. This Assessment of the Housing Land Supply examines the methodology and assumptions adopted in the Main Issues Report, the Monitoring Statement (August 2014) and the Housing Background Paper (August 2014) to clarify whether the Council's preferred development strategy will meet the requirements set out by Scottish Planning Policy (SPP) and the approved SESplan Strategic Development Plan (SDP), together with the guidance in PAN 2/2010: *Affordable Housing and Housing Land Audits*.
- 1.3. The analysis in this Assessment confirms the proposed development strategy:
- includes homes on sites which are constrained (and not effective) contrary to the requirements of SESplan and the agreed Housing Land Audit 2013;
  - does not present evidence about the future supply of completions from windfall sites in accord with SPP (paragraph 117);
  - assumes that all of the allocations will be built by the end of the plan period and this assumption is not supported by the programming agreed with Homes for Scotland; and
  - will not maintain a 5 year effective housing land supply at the point of adoption.
- 1.4. This Assessment confirms that there is a significant shortfall in the scale of new housing allocations required to be made in the forthcoming Proposed Plan to meet the agreed housing land requirement in full and consequently, the proposed development strategy will not maintain a 5 year effective housing land supply at all times.
- 1.5. Further effective housing land releases are urgently needed in support of the Council's preferred development strategy. This is in accord with SESplan Policy 5 *Housing Land* and Policy 6 *Housing Land Flexibility*.
- 1.6. The consequence of failing to make these additional allocations is that the Council will not be maintaining a 5 year effective housing land supply from the adoption of the new LDP. This will mean that the housing land supply policies in the new LDP will be considered out of date in accord with SPP paragraph 125. In these circumstances a presumption in favour of development that contributes to sustainable development will apply through the development management process as set out in SPP paragraphs 29 and 32-35.

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## 2.0 Scottish Planning Policy

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2.1 SPP (June 2014) sets out the policy requirements in paragraphs 109 to 125 for both development plans and development management for *Enabling the Delivery of New Homes*.

2.2 The policy principles which have a direct consequence on the Council's preferred development strategy and are summarised in SPP, paragraph 110:

**Policy Principles**

*110. 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;*
- *enable provision of a range of attractive, well-designed, energy efficient, good quality housing, contributing to the creation of successful and sustainable places; and*
- *have a sharp focus on the delivery of allocated sites embedded in action programmes, informed by strong engagement with stakeholders.*

2.3 The delivery mechanism should include partnership working with a range of partners including the delivery sector such as Homes for Scotland as set out in paragraph 111.

2.4 LDPs should be based on a robust and credible HNDA. It should adopt the housing supply target based on evidence from the HNDA for both affordable and market sector housing. As paragraph 115 explains, this housing supply target is a policy view of the number of homes to be delivered over the development plan period but must properly reflect the HNDA estimate of housing demand and be supported by compelling evidence. The choice of the housing supply target should also be reflected in the local housing strategy.

2.5 In paragraph 116, the housing supply target will be based on the number of homes to be built in the plan period together a margin of 10% to 20% to ensure a generous land supply is provided. The exact extent of the margin depends on local circumstances and requires a robust explanation. This then establishes the housing land requirement for the LDP.

2.6 The application of the 'generosity allowance' translates the housing supply target to the housing land requirement.

2.7 Sources of land supply to meet the housing land requirement are referred to in paragraph 117. These include the established land supply, proposed new allocations and a proportion of windfall development which can be justified.

2.8 This housing supply target should be set out in the Strategic Development Plan (SDP) as well as the housing land requirement up to year 12. This housing supply target should be met in full (paragraph 118). In addition beyond year 12 and up to year 20, the SDP should provide an indication of the possible scale and location of housing by local development plan area.

2.9 Local development plans in city regions should allocate sites which are effective or expected to become effective in the plan period to meet the housing land requirement up to year 10 from the date of

adoption. Planning authorities need to be confident that the allocated sites will enable the housing land requirement to be met.

- 2.10 This process is helpfully set out in Diagram 1 on page 30.
- 2.11 SPP requires planning authorities to maintain a 5 year effective land supply at all times, using the housing land audit process as a monitoring tool measure whether this requirement is being met (paragraph 123). Where a shortfall in the 5 year effective land supply emerges then according to paragraph 125, development plan policies for the supply of housing land will not be considered up to date and reference to paragraphs 32 to 35 of SPP is made. This is a reference to the development management process and how the issue of prematurity is to be addressed with a presumption in favour of sustainable development.
- 2.12 In considering the implications of these paragraphs, their interpretation needs to have regard for the existing guidance in PAN2/2010 about assessing the amount of effective housing land using the housing land audit process (paragraph 57); restricting the proportion of effective land to be included to that which can be built in the plan period (paragraph 56) and the factors which determine whether a site is effective or not (paragraph 55).

### 3.0 SESplan SDP

3.1 In approving SESplan SDP, Scottish Ministers set out a requirement for Supplementary Guidance in respect of Policy 5 *Housing Land* to identify the housing land requirement to be met by the local development plans for the periods 2009 to 2019 and 2019 to 2024.

3.2 The Supplementary Guidance has now been approved by the Scottish Ministers subject to modification. The following sentence should be deleted from 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.*

3.3 The SESplan Joint Committee considered the matter at its meeting on 30 June 2014 and recommended to the member authorities that the guidance be adopted with the modification

3.4 Policy 5 states 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 to 2019 and in the period 2019 to 2024.*

*...Subject to any justifiable allowance for anticipated house completions from 'windfall' sites, and for demolitions of existing housing stock, Local Development Plans will allocate sufficient land which is capable of becoming effective and delivering the scale of the housing requirements for each period, which will be confirmed in the supplementary guidance.*

*...Those existing housing sites which are assessed as being constrained, but also capable of delivering housing completions in the period 2024 to 2032, should be safeguarded for future housing development.*

3.5 It is clear from Policy 5 that the housing land requirement for West Lothian will be set out in the Supplementary Guidance.

3.6 The housing land requirement for the emerging West Lothian LDP as established in the Supplementary Guidance is set out in the table below:

Local Development Plan	2009-2019	2019-2024
West Lothian	11,420	6,590

Source: Supplementary Guidance, Table 3.1 Housing Land Requirement by Local Development Plan Area

3.7 According to SPP (paragraph 115), this is the housing supply target for West Lothian.

3.8 It can be concluded that the SDP has adopted the findings of the HNDA and therefore the housing supply target as set out in paragraph 115 of SPP. This housing supply target should be adopted by the Council for Local Development Plan purposes.

3.9 According to the HNDA and the Supplementary Guidance, most of the need and demand will arise in the period to 2019. It is therefore imperative that the finalised development strategy in the adopted LDP is capable of releasing the scale of effective sites needed in the short term. There needs to be no doubt about the effectiveness of the allocated sites in the LDP to deliver at least 11,420 homes by 2019.

3.10 SESplan Policy 6 *Housing Land Flexibility* requires that:

*Each planning authority in the SESplan area shall maintain a five years' effective housing land supply at all times. The scale of this supply shall derive from the housing requirements for each Local Development Plan area identified through the supplementary guidance provided for by Policy 5. For this purpose planning authorities may grant planning permission for the earlier development of sites which are allocated or phased for a later period in the Local Development Plan.*

3.11 Each planning authority in the SESplan area shall maintain a five year effective housing land supply at all times otherwise the development plan policies about the supply of housing land will not be considered up to date (SPP, paragraph 125).

3.12 As set out in paragraph 119, SPP requires that the emerging LDP should allocate a range of sites which are effective or are expected to be effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected date of adoption.

3.13 Further, the development strategy proposed in the emerging LDP should provide for a minimum of a 5 year effective land supply at all times.



## 4.0 West Lothian Main Issues Report

- 4.1 SESplan Policy 5 requires that the emerging LDP allocates *...sufficient land which is capable of becoming effective and delivering the scale of the housing requirements for each period.*
- 4.2 The established housing land supply in West Lothian, in accord with the agreed Housing Land Audit 2013, is 22,533 homes. This is slightly below the 22,847 homes recorded in the established supply in Housing Land Audit 2012. The Council has adopted Housing Land Audit 2012 as the baseline for the MIR.
- 4.3 The Council's preferred strategy, as set out in the MIR, is that most of its housing land requirement over the LDP period is already *...met through land allocations made in the WLLP principally the CDAs at Armadale, East Broxburn and Winchburgh and Livingston and the Almond Valley and other large strategic sites such as Heartlands (Whitburn), Wester Inch (Bathgate) and Drumshoreland (Pumpherstoun and Uphall Station (paragraph 3.50).*
- 4.4 In order to *...ensure that a wider choice of housing opportunity is available, that a generous supply of housing land is provided and an effective five year housing land supply can be made available at all times...* the Council's preferred strategy seeks to augment the established supply with the allocation of 3,500 new homes in the emerging LDP (paragraph 3.51).
- 4.5 Therefore, the Council's preferred strategy is to *...plan for a total of 26,347 houses which represents 3,500 houses above the base supply.*
- 4.6 The following analysis sets whether the position adopted by the Council is in accord with SESplan and SPP.
- Establishing Proposed Plan Housing Supply Target and Housing Land Requirement**
- 4.7 The housing supply target is set out in the Glossary for SPP. SPP explains that *... it is the number of homes to be built.* The housing land requirement is the housing supply target **plus** a generosity allowance of between 10% and 20%. This housing land requirement should then be adopted for the LDP.
- 4.8 The Council's preferred strategy has adopted a figure of 26,347 homes for the period 2009 to 2024. The Council explains the rationale as to why this approach approach has been adopted in the MIR, on page 30 :
- The council's preferred strategy is scenario 3 to provide for more housing than the minimum required by the supplementary guidance required to support the SDP and the LDP should allocate housing land for an additional 3,500 houses above existing committed development. This would result in a level of development beyond requirements set out in the housing supplementary guidance to support the SDP. However, this scenario is only preferred if the council can be satisfied that the infrastructure required to support this scale of development can be delivered in full and also in recognition that it is not anticipated that this increased allowance will be delivered by 2024 but is there to allow for the delivery of development into the period 2024-2032.*
- 4.9 The Council's preferred strategy does not define a housing land requirement in accord with SESplan and is contrary to the SDP.
- 4.10 In order to comply with SESplan Policy 5 and the Supplementary Guidance, the housing supply target to adopt is 11,420 homes from 2009 to 2019 and 6,590 homes from 2019 to 2024..

4.11 This is set out in the following table:

	2009-2019	2019-2024
Housing Supply Target	11,420	6,590

4.12 This housing supply target needs to be adopted in the LDP to accord with SPP, as set by the SDP in accord with the evidence presented in the HNDA.

4.13 The Council needs to adopt a generosity allowance of between 10% and 20% in order to comply with the requirements of Scottish Ministers as set out in SPP paragraph 116.

4.14 This means that the housing land requirement for West Lothian is between 12,562 homes and 13,704 homes for the period 2009-19. The housing land requirement for the period 2019-24 is between 7,249 homes and 7,908 homes.

4.15 This is set out in the table below:

	2009-2019	2019-2024	2009-2019	2019-2024
Housing Supply Target	11,420	6,590	11,420	6,590
Generosity Allowance (10%)	1,142	659		
Generosity Allowance (20%)			2,284	1,318
Housing Land Requirement	12,562	7,249	13,704	7,908

4.16 It should be noted that the development strategy in the emerging LDP needs to meet the housing land requirement in full over each of the plan periods. It cannot be averaged over the full plan period to 2024.

4.17 The next step is determining whether the proposed development strategy with its proposed allocations together with the known effective land supply over the plan period meets this housing land requirement.

#### **Completions in the Initial Plan Period**

4.18 The Council has confirmed 1,825 completions from housing sites in the period 2009 to 2013. This is agreed with Homes for Scotland.

#### **Identifying the Effective Housing Land Supply**

4.19 The MIR does not identify the scale of the effective housing land supply for the period to 2019 and the period to 2024. The Council has adopted Housing Land Audit 2012 as the baseline, despite the availability of Housing Land Audit 2013. The Council further confuses matters by referring to the draft Housing Land Audit 2014 in Appendix 3 *List of preferred housing sites and proposed phasing* of the MIR. For the avoidance of doubt, draft Housing Land Audit 2014 has not yet been agreed with the house builders through Homes for Scotland and cannot be adopted for planning purposes.

4.20 For the purpose of identifying the scale of the effective housing land supply, reference should be made to the latest agreed Housing Land Audit. In this case, this is Housing Land Audit 2013.

4.21 Analysis of the effective housing land supply for the period to 2024 has been carried out in accord with the agreed Housing Land Audit 2013 and confirms that the scale of the effective housing land supply for the period 2013-2019 is 4,336 homes.

4.22 The scale of the effective housing land supply for the period 2019-24 is 2,729 homes based on continuing the agreed program of completions from effective housing sites from 2020 to 2024.

4.23 This analysis is set out in the Annex, Table 1 *Effective Housing Land Supply*.

**Identifying the Completions from Constrained Sites**

4.24 Analysis set out in Appendix 3 of the MIR confirms that the Council’s preferred strategy assumes that 4,964 completions will be built on 70 sites identified as Constrained Sites in Housing Land Audit 2013 for the period 2013-24. The Council has not explained the rationale as to why this approach has been adopted.

4.25 The agreed Housing Land Audit 2013 confirms that both the Council and Homes for Scotland expect that there will be no completions from these 70 sites before 2020. The housing land audit period does not go beyond that date.

4.26 No evidence has been presented by the Council in the MIR or any supporting paper that would support this position. The agreed position between the Council and Homes from Scotland is that these sites are constrained and will not contribute to the housing land supply before 2020.

4.27 The Council has not confirmed the effectiveness of these Constrained Sites in accord with SPP paragraphs 118 and 123 as well as PAN 2/2010.

4.28 In accord with SESplan Policy 5 *...existing housing sites which are assessed as being constrained, but also capable of delivering housing completions in the period 2024 to 2032, should be safeguarded for future housing development.*

4.29 The programming adopted by the Council for these 70 Constrained Sites is set out in the Annex, Table 2 *Constrained Sites*. For the purposes of the emerging Proposed Plan, and in accord with SESplan Policy 5, it must be assumed that no completions from these 70 sites will be adopted before 2024 unless agreed with the house building sector through Homes for Scotland.

**Identifying the Completions from Windfall Sites**

4.30 The Main Issues Report does not identify the scale of completions likely to be delivered from windfall sites over the plan period.

4.31 SPP paragraph 117 states that *... any assessment of the expected contribution to the housing land requirement from windfall sites must be realistic and based on clear evidence of past completions and sound assumptions about likely future trends.*

4.32 The glossary of SPP identifies windfall sites as *...sites which become available for development unexpectedly during the life of the development plan and so are not identified individually in the plan.*

4.33 The glossary of SESplan identifies windfall sites as *...site which becomes available for development during the plan period which was not anticipated to be available when the plan was being prepared.*

4.34 SESplan’s Urban Capacity Study (2009) sets out the anticipated windfall output for West Lothian as 186 homes per annum for 2008-15 and 80 homes per annum for 2015-24. This is set out in the table below:

Period	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24
Windfall	186	186	80	80	80	80	80	80	80	80	80

Source: SESplan *Urban Capacity Study* (2009)

4.35 SESplan Supplementary Guidance *Technical Note* sets out the anticipated windfall output for West Lothian as 480 homes 2009-19 and 400 homes per annum for 2019-24. This is set out in the table below:

4.36 For the purposes of this Assessment, the figures from SESplan Supplementary Guidance have been adopted. The base position of SESplan is the Housing Land Audit 2012 and therefore windfall contributions begin in 2013/14. The Council will however be required to prepare a study to support any windfall assumptions adopted.

4.37 Any windfall sites for 2012/13 and 2013/14 would already be included in Housing Land Audit 2013.

4.38 This equates to 80 completions per annum from windfall sites for the period 2014 to 2024 or 800 homes over the plan period.

#### **Identifying Demolitions**

4.39 SESplan Supplementary Guidance *Technical Note* forecasts a total of 568 demolitions in West Lothian for the period 2009-19 and 100 demolitions from 2019-2024.

4.40 The Council has confirmed there were 448 demolitions from 2009/10 to 2012/13. Remaining demolitions from 2013-24 are programmed at 20 homes per annum.

#### **Identifying the Programming of Completions from Proposed Allocations**

4.41 The Council's programming of preferred new housing allocations is set out in Appendix 3 of the MIR. This programming is replicated in the Annex, Table 3 *Programming of Preferred Allocations*.

4.42 This assumes that over the period 2014 to 2024 3,245 homes will be built from the proposed new allocations of 3,745 homes.

4.43 Appendix 3 of the Main Issues Report *...provides details of the council's anticipated completions within the respective periods 2014-19, 2019-24 etc for each individual site within each named settlement.*

4.44 The Council's *...programming of 'preferred' sites has had regard, where appropriate, to their status in the draft Housing Land Audit 2014.*

4.45 Draft Housing Land Audit 2014 has not been agreed by the house building sector through Homes for Scotland. This represents only the Council's view of anticipated house completions, and does not accord with the requirements of PAN 2/2010.

4.46 This programming will need to be agreed with Homes for Scotland prior to the publication of the Proposed Plan.

#### **Re-programming of the effective housing land supply**

4.47 It is evident that the Council has re-programmed completions from the agreed effective housing land supply set out in Housing Land Audit 2013.

4.48 Appendix 3 of the MIR estimates that 4,610 completions will be delivered from 63 sites confirmed as being effective in Housing Land Audit 2013 in the period 2014-19.

4.49 The agreed Housing Land Audit 2013 programmes 3,748 completions from those 63 sites from the effective supply for 2013-19. The Council has increased future build rates by 864 completions without agreement with the house builders through Homes for Scotland.

4.50 Appendix 3 of the MIR estimates that 3,769 homes will be delivered from this effective supply from 2019-24. This is not agreed with Homes for Scotland.

- 4.51 The only available evidence is agreed Housing Land Audit 2013 programmes completions to 2020. Assuming the completions continue at the rate agreed to 2024, only 2,620 completions from this effective housing land supply are expected during 2019-24.
- 4.52 Appendix 3 of the MIR programmes a total of 8,379 homes from these 63 sites in the effective supply from 2014 to 2024. The agreed Housing Land Audit 2013 programmes 6,368 completions from these same sites over the period 2013 to 24. This is a substantial difference of 2,011 homes.
- 4.53 Appendix 3 of the MIR also assumes that 125 completions will be delivered from small sites for the period 2014-19 and 175 completions from small sites for the period 2019-24. In total, the Council has programmed 300 completions from small sites for the period 2014-24.
- 4.54 Housing Land Audit 2013 assumes an average of 26 homes per annum for small sites. This would mean 156 homes from 2013-19 and 130 homes from 2019-204. This is the agreed position and should be adopted by the Council.
- 4.55 In total, Appendix 3 of the MIR estimates that 8,679 homes will be delivered from the effective land supply from 2014 to 2024, including small sites. This has regard to the programming in Housing Land Audit 2014 together with the Council's assumptions on programming post 2018/19, beyond the period of the agreed Housing Land Audit 2012.
- 4.56 The baseline of the MIR is Housing Land Audit 2012 and this only identifies effective land from 2012 to 2019, not beyond. The draft Housing Land Audit 2014 is not agreed with Homes for Scotland and any assumptions on programming is only the Council's view.
- 4.57 The agreed Housing Land Audit 2013 presents the most up to date position on effective housing land between the Council and the house builders. This should have been adopted by the Council for assessing the MIR.
- 4.58 Further, the programming of completions arising from new preferred allocations in the MIR is not agreed with the house building sector through Homes for Scotland. The programming of the new allocations needs to allow for lead in periods and commercial rates of house building.
- 4.59 There is significant confusion also between the Council's preferred development strategy and the programming set out in Appendix 3. For example, the MIR states that in Linlithgow it is *...unlikely that land will be released before 2019*. This is because of the Council's view on education infrastructure capacity.
- 4.60 The programming of preferred allocations in Appendix 3 of the MIR confirms that the Council anticipates that there will be 251 new house completions in Linlithgow in the period 2014-19. 184 of these completions are from preferred new allocations. This does not accord with that statement that it is *...unlikely that land will be released before 2019*.
- 4.61 It can be concluded that the Council's expectation that almost all of the preferred new allocations will be built by 2024, as presented in Appendix 3 of the MIR, is unfounded and is not agreed with the house building sector. This is contrary to the requirements of SPP and PAN 2/2010.

## 5.0 Recommendations for Proposed Plan

- 5.1 The Council's preferred development strategy as set out in the Main Issues Report does not comply with the requirements of SESplan or the expectations of Scottish Ministers.
- 5.2 The emerging LDP needs to identify a housing land requirement for the periods 2009-19 and 2019-24 based on the supply target set out in SESplan Supplementary Guidance, together with a generosity allowance of between 10% and 20%. This is set out in the table below:

	Generosity Allowance (10%)		Generosity Allowance (20%)	
	2009-2019	2019-2024	2009-2019	2019-2024
Housing Supply Target	11,420	6,590	11,420	6,590
Generosity Allowance (10%)	1,142	659	2,284	1,318
<b>Housing Land Requirement</b>	<b>12,562</b>	<b>7,249</b>	<b>13,704</b>	<b>7,908</b>

- 5.3 The methodology for identifying the housing land shortfall to be met by allocations in the LDP is defined in SESplan Policy 5. Analysis of the Council's preferred development strategy has been carried out in accord with the methodology set out in SESplan Policy 5.
- 5.4 This analysis includes a generosity scenario for a generosity allowance of 10% and 20%. There is no allowance for completions from constrained sites prior to 2024 in accord with SESplan Policy 5. Windfall assumptions and demolitions allowances are as set out in SESplan *Supplementary Guidance Technical Note*. The assumptions on windfall sites will need to support by a study prior to consultation on the Proposed Plan.
- 5.5 The analysis includes the Council's programming of preferred allocations for 2014-19 and 2019-24. This analysis is set out in the table below:

	Generosity Allowance (10%)		Generosity Allowance (20%)	
	2009-2019	2019-2024	2009-2019	2019-2024
Housing Supply Target	11,420	6,590	11,420	6,590
Generosity Allowance	1,142	659	2,284	1,318
<b>Housing Land Requirement</b>	<b>12,562</b>	<b>7,249</b>	<b>13,704</b>	<b>7,908</b>
<i>minus</i> Completions	1,825		1,825	
<i>minus</i> Effective Supply	4,336	2,729	4,336	2,729
<i>minus</i> Constrained sites coming forward	0	0	0	0
<i>minus</i> Windfall	400	400	400	400
<i>plus</i> Demolitions	568	100	568	100
<b>equals</b> <b>Allocations Required</b>	<b>6,569</b>	<b>4,220</b>	<b>7,711</b>	<b>4,879</b>
<i>minus</i> Programming of Preferred Allocations	2,037	1,208	2,037	1,208
<b>equals</b> <b>Further Allocations Required</b>	<b>4,532</b>	<b>3,012</b>	<b>5,674</b>	<b>3,671</b>

- 5.6 This analysis confirms that the number of new allocations required in the Proposed Plan is between 6,569 homes and 7,711 homes for the period 2009-19. The number of allocations required in the Proposed Plan for the period 2019-24 is between 4,220 homes and 4,879 homes.
- 5.7 Taking account of the programming of preferred allocations set out in the MIR, Appendix 3, which is not agreed by Homes for Scotland, the number of additional new allocations required in the Proposed

Plan over and above the preferred allocations identified in the MIR is between 4,532 homes and 5,674 homes for the period 2009-19. The number of further new allocations required in the Proposed Plan for the period 2019-24 is between 3,012 homes and 3,671 homes.

- 5.8 These additional allocations are necessary in order to ensure that the Proposed Plan can meet the housing land requirement in full as required by SESplan.
- 5.9 It is apparent from this Assessment that there is a critical shortfall of effective housing land in the first plan period to 2019. This matter has been raised by Reporters in recent appeal decisions. The Council's development strategy for the Proposed Plan needs to focus on reconciling its methodology to that required to comply with SESplan and SPP as well as identifying sufficient effective housing land that can contribute to the effective housing land supply in the short term period to 2019.
- 5.10 The consequence of failing to do so is that the Council will not maintain a 5 year effective housing land supply from the date of adoption of the new LDP. This will mean that the housing land supply policies in the new LDP will be considered out of date in accord with SPP paragraph 125. In these circumstances a presumption in favour of development that contributes to sustainable development will apply through the development management process as set out in SPP paragraphs 29 and 32-35.

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**Annex      Assessment of the Housing Land Supply**

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**Table 1 Effective Housing Land Supply**

HLA Ref	EOI Ref	Local Plan Ref	Site Name	Brf/ Grf	14- 19	19- 24	24- 29	29- 34	34- 36	HLA 2013 programming	
										13-19	19-24
26/7(2)		HAd6	Muirhousedykes Mains (Ross Court)	G	5	0	0	0	0	5	0
NH			R1A (East) Ferrier Path	G	13	0	0	0	0	17	0
NH			R1B (West) Hanlin Park	G	26	0	0	0	0	24	0
1/37			Craigengall Farm	G	6	0	0	0	0	7	0
1/30			South Couston Farm	G	4	0	0	0	0	2	0
LT			Lower Bathville	G	144	240	16	0	0	72	120
LT			Tarrareoch	G	168	182	0	0	0	120	230
NH			Netherhouse	G	109	0	0	0	0	108	0
TF			Trees Farm	G	168	182	0	0	0	96	120
SN			Standhill (North)	G	120	180	0	0	0	36	120
SS			Standhill (South)	G	72	28	0	0	0	72	28
2/69	EOI-0163	HBg24	Napier Avenue	G	10	0	0	0	0	10	0
2/106			Former Woodthorpe Garden Centre	B	0	11	0	0	0	11	0
2/66(7)		HBg22	Standhill, Site A, (Inchcross Grange)	B	177	0	0	0	0	155	25
2/66(7)			Standhill, Site B	B	20	0	0	0	0	20	0
2/7E		HBg30	Little Boghead (6), Phase 1	G	150	0	0	0	0	150	0
2/73		HBg37	Factory Road	B	17	0	0	0	0	17	0
2/66 (15)		HBg39	Wester Inch, Areas S	B	76	0	0	0	0	70	0
2/66 (16)		HBg39	Wester Inch, Areas X,Y, Z and AA, (Wester Grove/The Lays)	B	61	0	0	0	0	105	0
2/66 (17)		HBg39	Wester Inch, Areas U & V, (Queens Gait & Reiver Grange)	B	121	0	0	0	0	121	26
2/66 (18)		HBg39	Wester Inch, Area W2, (Royal Gardens)	B	11	0	0	0	0	41	0
2/66 (19)		HBg39	Wester Inch, Phase 3	B	80	0	0	0	0	80	0
2/105a		HBg47	Windyknowe/Glasgow Road (East)	B	14	0	0	0	0	14	0
2/101a		HBg48	Bathgate Foundry South, (Former Edgar Allen Works) Whitburn	B	200	0	0	0	0	48	120
2/94		HBg51	Kaim Park Hotel Grounds	G	24	0	0	0	0	24	0
2/96		HBg54	Garden Cottage, Boghead Estate	G	1	0	0	0	0	6	0
2/110			Bloomfield Place	B	18	0	0	0	0	18	0
3/26	EOI-0095	HBb5	Redhouse West	G	74	0	0	0	0	70	0
3/36		HBb18	16 Bathgate Road	B	5	0	0	0	0	5	0
3/41			East Main Street (Former garage site)	B	7	0	0	0	0	7	0
21/3		HBc5	Woodmuir Road (West)	G	3	0	0	0	0	3	0
4/38a		HUB 20 pa	Holmes North (Site A)	G	10	5	0	0	0	10	5
4/40		HUb17	Candleworks	B	72	28	0	0	0	72	28
CDA	E01-0138	GW	Land east and west of Greendykes Road	G	96	360	124	0	0	96	240
CDA		WW	Westwood	G	72	336	282	0	0	96	240
		AD	Almondell, Phase 1, Sites MWC, MWd, MWf, MWe, LKa and LKb	G	63	0	0	0	0	0	0
		AD	Almondell, Phase 1, Sites Lka/LKc	G	107	0	0	0	0	0	0
		AD	Almondell, Phase 1, Sites MWf/LKb	G	110	0	0	0	0	0	0
		AD	Almondell (Balance)	G	264	396	450	660	250	252	360
CDA		RW	Raw Holdings West (Seven Wells)	G	80	0	0	0	0	0	0
CDA		RW	Raw Holdings West CDA (Balance)	G	72	240	98	0	0	114	120
6/15		HEc5	Camps Cottage	B	0	9	2	0	0	7	4
9/2		HKn2	Braekirk Gardens	G	9	6	0	0	0	12	3
10/79		HLi27	High Street ,Former Bus Depot	B	41	0	0	0	0	41	0
10/69 (2)		HLi29	Stockbridge North (2)	B	14	0	0	0	0	14	0
KW002		HLv104	Deerpark Heights, Eagles View, Livingston	G	28	0	0	0	0	80	0
B17		HLv136	Brucefield Industrial, (Limefields)	G	120	50	0	0	0	72	98
DI28		HLv138	Broomyknowe Drive, Deans	G	12	0	0	0	0	12	0
CDA		MO	Mossend (A)	G	173	0	0	0	0	173	0
CDA		MO	Mossend (B)	G	58	0	0	0	0	45	13
15/41			Gavieside	B	46	0	0	0	0	46	0
27/3		HLv98	Drumshoreland/Kirkforthar Brickworks (Site A)	B	264	361	0	0	0	96	120
17/22 (1)		HWb4	Polkemmet, Heartlands (1)	B	69	0	0	0	0	94	0
17/22		HWb4	Polkemmet, (Balance)	B	192	360	480	720	31	216	240
17/30		HWb11	Whitdale, East Main Street	B	49	0	0	0	0	49	0
17/32		HWb13	St. Joseph's Primary (South)	G	30	0	0	0	0	53	0
CDA		GN	Glendevon (North), Block M, (Winchburgh Village)	G	111	0	0	0	0	0	0
CDA		GN	Glendevon (North), (Balance)	G	96	360	360	36	0	214	120
CDA		GS	Glendevon (South), Block K, Site A, (Churchill Brae)	G	77	0	0	0	0	106	0
CDA		GS	Glendevon (South), Block K, Site B, (Glendevon Gait)	G	50	0	0	0	0	76	0
CDA		GS	Glendevon (South), Balance	G	96	240	360	111	0	48	120
CDA		MS	Myreside, Block AA, (Seton Park)	G	105	48	0	0	0	0	0
CDA		MS	Myreside, (Balance)	G	120	147	0	0	0	120	120
					4610	3769	2172	1527	281	3748	2620
					Total	8379				Total	6368

**Table 2 Constrained Sites**

HLA Ref	EOI Ref	Local Plan Ref	Site Name	Brf/ Grf	14- 19	19- 24	24- 29	29- 34	34- 36
26/6		HAd4c	Loganlea Crescent/Place	G	35	0	0	0	0
26/8		HAd7	Meadowhead Avenue (North)	G	20	0	0	0	0
1/25		HAm8	Muirfield (North Street)	B	10	0	0	0	0
1/29c		HAm12c	Nelson Park	G	47	0	0	0	0
1/35			50 East Main Street	B	7	0	0	0	0
CS			Colinshiel	G	144	126	0	0	0
2/98a		HBg29	Easton Road (Sibcas Site)	B	144	154	0	0	0
2/78		HBg41	Pentland Avenue	B	0	21	0	0	0
2/100		HBg45	Jarvey Street	B	25	28	0	0	0
2/105b		HBg47	Windyknowe/Glasgow Road (West)	G	46	0	0	0	0
2/36			32 Hopetoun Street	B	5	0	0	0	0
2/109			Creamery Garage, 8 Hardhill Road	B	14	0	0	0	0
3/10		HBb16	Beechwood Road	G	10	0	0	0	0
3/2(2)		HBb2	Daisyhill Road	B	9	0	0	0	0
3/27		HBb6	Riddochhill Road	G	0	15	0	0	0
3/32		HBb10	West Main Street (West)	G	0	6	0	0	0
3/33		HBb11	West Main Street (East)	G	0	6	0	0	0
31/5 (A)		HBr5	Harthill Road, (Allison Gardens) (A)	B	58	0	0	0	0
31/5 (B)		HBr6	Harthill Road, (Allison Gardens) (B)	G	6	0	0	0	0
31/12		HBr5b	Westcraigs Road (south of railway line)	G	0	10	0	0	0
31/13		HBr8	Craiginn Terrace	G	144	66	0	0	0
31/11		HBr9	Woodhill Road	G	0	30	0	0	0
21/4		HbC3	Rashiehill Crescent	G	0	5	0	0	0
21/5		HbC6	Woodmuir Road (East)	G	48	72	0	0	0
22/4	EOI-0011	HBd2	Willowdean (South)	B	20	20	0	0	0
4/37		HUB12	Greendykes Road	B	24	26	0	0	0
4/22		HUB13	Holmes North (Site B)	G	0	20	0	0	0
4/39		HUB15	Albyn	B	0	288	62	0	0
CDA	EOI-0138	GE	Greendykes Road (East)	G	24	111	0	0	0
CDA		GI	Greendykes Industrial Estate	B	10	0	0	0	0
5/5(a) (b)	EOI-0034	HBn1/ HBn	Bangour Village Hospital (including expansion site)	B	96	240	164	0	0
6/17		HEc6	Broompark Farm	B	50	0	0	0	0
7/24		HFh8	Meadow Crescent	G	7	0	0	0	0
7/26		HFh10	Park View (West)	G	0	18	12	0	0
7/25		HFh11	Shotts Road	G	0	18	12	0	0
7/30		HFh15	Breichwater Place (formerly Croftfoot Drive)	G	61	0	0	0	0
7/38		HFh19	Sheephousehill (North)	G	0	30	18	0	0
7/39		HFh20	Lanrigg Road (3)	G	30	0	0	0	0
7/40		FAU12	Eastfield Recreation Ground	G	30	0	0	0	0
9/14	EOI-0090	HKn10	Station Road (South) (extension)	G	0	30	0	0	0
9/11		HKn7	Station Road (East)	G	42	48	0	0	0
MS6A		HLv59	Murieston South 6A	G	56	0	0	0	0
MSR1	EOI-0100	HLv94	Murieston South R1	G	10	0	0	0	0
EE5B		HLv26	Ballantyne Place (South)	G	8	0	0	0	0
MS8		HLv61	Murieston South 8	B	9	0	0	0	0
B16		HLv73	Bellsquarry (16)	G	5	0	0	0	0
C35		HLv76	Craigshill (35)	G	0	10	0	0	0
C003		HLv79	Forth Drive, Craigshill	G	0	6	0	0	0
AV008 (part)	EOI-0189 8		Site west of Lidl, Almondvale Stadium	G	45	0	0	0	0
KN10B		HLv111	Kirkton North 10B	G	45	0	0	0	0
DI27		HLv122	Deans (West)/Hardie Road	G	0	5	0	0	0
AV008			Almondvale Stadium	B	96	68	0	0	0
CDA		CB	Cleugh Brae	G	0	100	0	0	0
11/1		HLr3	Curling Pond Lane	G	8	17	0	0	0
11/11		HLr6	Fauldhouse Road (North)	G	0	30	0	0	0
11/12			1 Hillside Place, Whitehart Inn	B	0	7	0	0	0
99/4		HLv100	New Calder Paper Mill (frontage site)	B	7	0	0	0	0
99/4		HLv134	New Calder Paper Mill	B	43	0	0	0	0
27/3			Drumshoreland/Kirkforthar Brickworks (Site B)	B	144	191	0	0	0
13/12		HSb6	Stoneyburn Farm (East)	G	48	12	0	0	0
13/13		HSb7	Stoneyburn Farm (West)	G	48	12	0	0	0
15/39		HWc10	Polbeth Farm	G	24	0	0	0	0
13/15			Stoneyburn Workshops North	B	0	8	0	0	0
16/3 & 16/4		HWf1	North & South Logiebrae	B	144	406	0	0	0
32/1	EOI-0076	HWk1	Wilkieston	G	50	0	0	0	0
18/13	EOI-0149	HWh5	Winchburgh Primary School, Dunn Place	G	20	0	0	0	0
18/05		HWh3	Castle Road	B	10	0	0	0	0
CDA		NN	Niddry Mains (North)	G	48	240	182	0	0
CDA		NS	Niddry Mains (South)	G	48	216	146	0	0
CDA		CP	Claypit	G	72	94	0	0	0
					2154	2810	596		
					Total	4964			

**Table 3 Programming of Preferred Allocations.**

HLA Ref	EOI Ref	Local Plan Ref	Site Name	Brf/ Grf	14- 19	19- 24	24- 29	29- 34	34- 36
	LATE-0008		Land to west of Loganlea	G	5	0	0	0	0
	EOI-0056		Mid Street/Rosemount Court	B	9	0	0	0	0
	EOI-0162		Meadowpark, 13-15 Glasgow Road	B	22	0	0	0	0
	EOI-0153		Guildiehaugh Depot	B	0	100	0	0	0
	EOI-0094		Waverley Street Depot	B	0	8	0	0	0
	LATE-0007		Blackburn Road	B	0	10	0	0	0
	LATE-0014		Former Abbatoir, Whitburn Road	B	0	100	0	0	0
	EOI-0140		Beechwood Road	G	24	21	0	0	0
	EOI-0185		Community centre and site of former petrol filling station south of Ashgrove	B	10	0	0	0	0
	EOI-0187		Trindleyknowe/Whitehill Road	B	0	10	0	0	0
	MUB1		Woodmuir Community Hall	B	5	0	0	0	0
	MUB2		Former Woodmuir Primary School	B	5	0	0	0	0
	EOI-0010		Land adjacent to Bridgend Golf Course	G	25	0	0	0	0
	EOI-0065		Bridgend Farm	G	10	20	0	0	0
	EOI-0085		Hillview Avenue	G	45	0	0	0	0
	EOI-0086		Kirkhill North Sites 1 & 2	B	230	0	0	0	0
	PJ-0008		Former Vion factory site, East Main Street	B	168	82	0	0	0
	BRO3		Old School site, West Main Street	B	18	0	0	0	0
	BRO6		Stewartfield	B	10	0	0	0	0
	EOI-0175		Carledubs	G	48	52	0	0	0
	EOI-0034		Bangour (additional units)	G	0	50	0	0	0
	EOI-0166		Land at Main Street	G	15	15	0	0	0
	PJ-0006		Burnhouse	G	48	72	0	0	0
	EOI-0124		Land on the north eastern boundary of Fauldhouse (part)	G	25	0	0	0	0
	EOI-0015		Boghall East	G	50	0	0	0	0
	EOI-0045		Land east of Manse Road	G	0	45	0	0	0
	EOI-0062		Land at Edinburgh Road	G	30	30	0	0	0
	EOI-0105		Land at BSW Timber, Falkirk Road	B	18	0	0	0	0
	EOI-0114		Wilcoxholm Farm/Pilgrimshill	G	0	200	0	0	0
	EOI-0131		Mill Road	G	30	0	0	0	0
	EOI-0168		Land at Preston Farm	G	0	50	0	0	0
	EOI-0184		Clarendon House, Manse Road	G	8	0	0	0	0
	EOI-0210		Clarendon Farm	G	48	72	0	0	0
	EOI-0002		Kirkton Business Centre	B	50	0	0	0	0
	EOI-0024		Appleton Parkway South East (Eliburn Park)	G	80	0	0	0	0
	EOI-0051		Site at Wellhead Farm (part)	G	48	52	0	0	0
	EOI-0099	ELv54	Linhouse	G	144	106	0	0	0
	EOI-0158		Almond Link Road, Civic Centre Junction	G	35	0	0	0	0
	EOI-0172		Former Lammermuir House	B	80	0	0	0	0
	EOI-0176		Glen Road, Deans	G	20	0	0	0	0
	EOI-0180		Rear of New Deans House	G	10	0	0	0	0
	EOI-0209		Buchanan House	B	120	0	0	0	0
	EOI-0221		Houston Road (North)	G	72	58	0	0	0
	PJ-0005		Eagle Brae Depot	B	30	0	0	0	0
	LIV12		Deans Road South	G	5	0	0	0	0
	TCU1		Former Trim Track, Howden South Road	G	45	0	0	0	0
	TCU8		Site north of Almondvale Way	G	30	0	0	0	0
	TCU9		Site south of Almondvale Way	G	40	0	0	0	0
	TCU10		Site north of Almondvale Road	G	40	0	0	0	0
	EOI-0120		Land at Back O Moss Farm/Main Street	G	10	10	0	0	0
	LON1		Longridge Park	G	5	0	0	0	0
	EOI-0118		Land north of the Brentswood Inn (part)	G	30	0	0	0	0
	EOI-0119		Land south of Ligton Terrace	G	30	0	0	0	0
	PJ-0002		Foulshiels Road	G	0	20	0	0	0
	BEN1		Burnlea Place & Meadow Place	G	35	0	0	0	0
	EOI-0161		Freeport Outlet Centre	B	30	0	0	0	0
	EOI-0001		Heartlands, Polkemmet	B	0	0	240	10	0
	EOI-0019		Dixon Terrace	B	61	0	0	0	0
	EOI-0108		Polkemmet Business Centre	B	10	0	0	0	0
	PJ-0004		Murraysgate, West Main Street	B	60	0	0	0	0
	EOI-0170		East Coxydene Farm	G	0	25	0	0	0
	WIN1		Former Beatlie School	B	11	0	0	0	0
	EOI-0193		Site west of Glendevon and south of Lampinsdub	G	0	0	250	0	0
					2,037	1,208	490	10	0
					Total	3245			